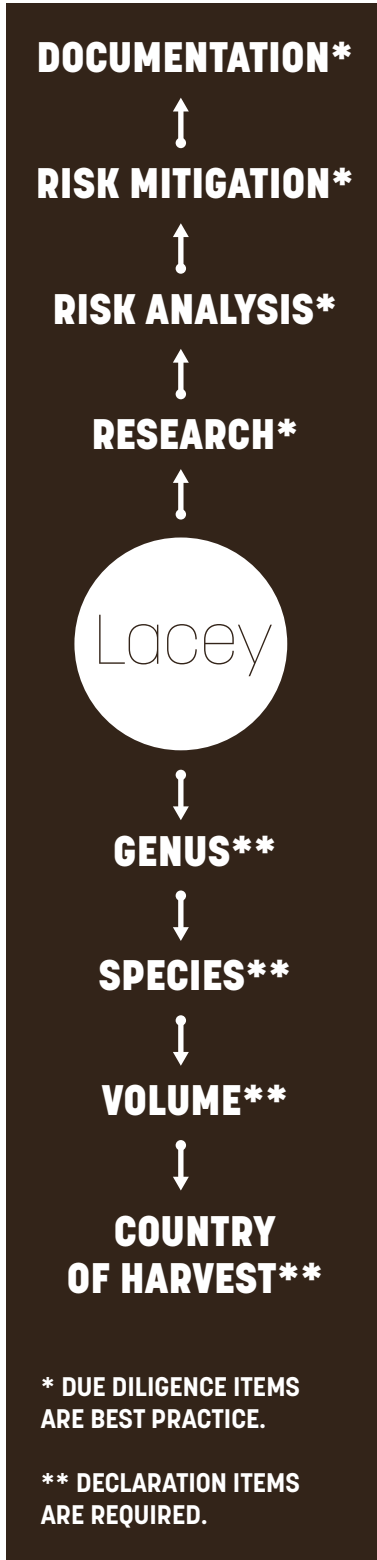


LACEY ACT

Answers



Q What is the Lacey Act?

A The Lacey Act is a US law that bans trafficking in illegal wildlife, amended in 2008 to encompass certain plant material, including wood products. The law imposes a **declaration requirement** as well as a **prohibition against trading in legally “tainted” material**.

The declaration component of the Lacey Act requires the submission of the **PPQ Form 505 APHIS Plant and Plant Product Declaration Form** (sometimes known as a “Lacey Declaration”). The PPQ Form 505 requires the importer of record to declare the genus, species, volume, and country of harvest. The importer of record is required to submit this form to USDA, via USCBP, at the time of importation into the US.

Q Who is responsible for forest product legality?

A The Lacey Act applies to every part of the supply chain, from grower to consumer. Potentially, anyone can be held legally responsible if a product is determined to be legally “tainted.” That’s why it’s important to work with suppliers who understand legality issues and source products responsibly.

With this in mind, Clarke Veneers and Plywood makes a point of cultivating ongoing relationships with suppliers. One of the most important parts of our business is building knowledge and confidence in our supply chain.

Supply Chain



GROWER



HARVESTER



PROCESSOR



IMPORTER



MANUFACTURER



DISTRIBUTOR



CONSUMER

To learn more about the Lacey Act, regulatory compliance, and our Verified Vendor Legality Assurance System, contact Clarke Veneers and Plywood.



Q What is a Lacey certificate?

A There is no such thing as a "Lacey certificate." Other than the import declaration PPQ Form 505 submitted to USDA, the Lacey Act doesn't require any documents. On the other hand, compliance with the regulation is best accomplished through a documented system of due diligence.

That's why Clarke Veneers and Plywood has developed consistent standards and procedures for sourcing our products. We explain our philosophy and protocol in our official **Clarke Responsible Sourcing Policy Overview**, and we issue Verified Vendor certificates to suppliers that satisfy our **Verified Vendor Legality Assurance System** requirements.

Q What does Clarke Veneers and Plywood do to promote legality?

A We have developed a program called our **Verified Vendor Legality Assurance System** to provide rigorous risk assessment and a consistent foundation for confidence in our products and suppliers. Our Chief Compliance Manager and executive officers personally review each supplier and maintain on-going relationships with them. Beyond a simple checklist, our goal is to foster a culture of responsibility throughout our supply chain.

For more facts about our procurement standards, reference our **Clarke Responsible Sourcing Policy Overview**, available upon request. It provides a succinct statement of our regulatory compliance philosophy and sourcing protocol.

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