

Australian Bluegum Plantations Pty Ltd (ABP)
 Due diligence system according to FSC-STD-40-005
 (V3.1) EN. REQUIREMENTS FOR SOURCING FSC® CONTROLLED
 WOOD

Introduction

Supply of hardwood for Australian Bluegum Plantation’s products may come from a variety of plantation sources. Some are local FSC certified and some are local controlled material source. All wood sourced is plantation grown from the Australian states of Victoria, South Australia, and Western Australia including all sub districts within these state boundaries. This manual is a Due Diligence System (DDS) for sourcing material that does not have an associated FSC claim (referred to as controlled material). Material delivered with a FSC claim is managed in accordance with ABP’s Chain of Custody Procedure.

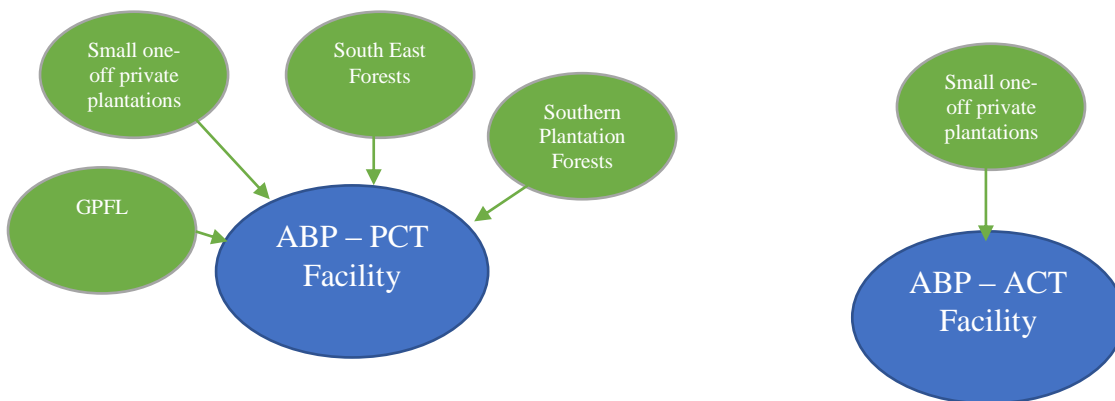
The basis of the ABP DDS is three elements: obtaining information, risk assessment and risk mitigation.

Obtaining information

Currently, hardwood controlled material supply is from:

- Green Triangle Plantation Forests (GPFL) – Green Triangle
- South East Forests Pty Ltd – Green Triangle
- Southern Plantation Forests Pty Ltd – Green Triangle
- Various small private one-off woodlots under the harvesting management of ABP – Green Triangle and Western Australia.

Figure 1 below is an overview of ABP’s hardwood non-certified supply chain to the Portland Chip Terminal and the Albany Chip Terminal



Details on suppliers are maintained in ABP's *Approved Supplier List*. Required information for direct suppliers includes:

- name and address details
- description of the material (roundwood log or woodchip)
- quantity of material purchased or contracted volume to be supplied
- species – (Scientific name: *Pinus radiata* Common name: Radiata Pine)
- purchase documentation (this includes Purchase Agreements and Invoices maintained by the Regional manager)
- information on supply chain of suppliers (i.e. sub-suppliers to ABP)

ABP will send suppliers with a *Supplier Information Letter* which requires suppliers to declare all their suppliers to the supply unit of origin and to inform ABP as soon as possible of any changes to suppliers, species, or origin. **This is only applicable to suppliers where ABP is not planning or managing the harvesting operations.**

The applicable risk assessment is described in the section below.

The country of harvest will always be in Australia and the states of Victoria, South Australia, and Western Australia.

Risk Assessment

ABP uses a risk assessment on this supply chain as part of their program for controlled wood sources under FSC-STD-40-005 (V3.1) EN. REQUIREMENTS FOR SOURCING FSC® CONTROLLED WOOD. The risk assessment used is the FSC Australia Controlled Wood Risk Assessment Matrix (FSC-CWRA-001-AUS (V1-0)) which has already obtained information and formulated a risk assessment and determined a low risk for four of the five controlled wood criteria in the states of Western Australia, Victoria and South Australia.

Illegally harvested wood, wood harvested in violation of traditional and civil rights, wood harvested from forests being converted to plantations or non-forest uses, and wood from forests in which genetically modified trees are planted are therefore LOW RISK for the purposes of the national risk assessment and this Due Diligence System.

The fifth criteria, wood harvested from forests in which high conservation values (HCV) are threatened by management activities, was found to have an unspecified risk under the current National Risk Assessment.

Under the new standard there is a category called 'specified risk' defined as:

"A conclusion, following a risk assessment conducted according to FSC-PRO-60-002a FSC National Risk Assessment Framework, that there is risk which cannot be determined as low that forest products from unacceptable sources may be sourced or enter the supply chain from a specific geographic area. The nature and extent of this risk is specified for the purpose of defining efficient control measures."

(Source: FSC-PRO-60-002a FSC National Risk Assessment Framework)

Under FSC-STD-40-005 (V3.1) EN. REQUIREMENTS FOR SOURCING FSC® CONTROLLED WOOD. When specified or unspecified risk for the source of the material or mixing in the supply chain is identified, **control measures** shall be implemented by the organisation to mitigate the risk.

FSC-STD-40-005 (V3.1) EN 4.5 says:

"Indicators and verifiers in an approved Forest Stewardship National Standard, certification body standard, or International Generic Indicators may be used for control measures where relevant."

For the purposes of FSC Australia the [FSC Australia's HCV framework](#), which is normative for both controlled wood and the purposes of full FSC forest certification in Australia, specifies the risks and points towards appropriate control measures. Under this approach there is verification appropriate 'tools' used to satisfy the 6 classes of HCV. Therefore risk mitigation is achieved by applying the guidance as control measures and monitoring the effectiveness of their implementation.

ABP also documents the risk of mixing material with non-eligible inputs in its supply chains. Refer *Mixing Risk Assessment*.

FSC-PRO-60-002a FSC National Risk Assessment Framework for each supply source

ABP RISK ASSESSMENT OF WOOD SUPPLY

ABP shall adapt its DDS to use FSC risk assessments within six (6) months of the date of FSC risk assessment approval by FSC, unless an extension is justified and approved by the certification body.

Whenever specified or unspecified risk related to origin and/or risk related to mixing with non-eligible inputs in the supply chain is determined, ABP shall implement the requirements of Section 4 of the Standard before material can be used as controlled material or sold with the FSC Controlled Wood claim.

Version 4.0, Reviewed July 2016 (no change to the FSC Australia Controlled Wood Risk Assessment Matrix v1)

Certificate holder:	Australian Bluegum Plantations	Certification Body (CB):	Rainforest Alliance
FSC CW Certificate Code:	RA-CW-005606	Date of CB Approval:	Pending approval – subject to audit.
Date of risk assessment:	FSC Australia Controlled Wood Risk Assessment MATRIX <i>FSC-CWRA-001-AUS</i> Version 1-0, July 8, 2009	Address of CB:	65 Millet Street, Suite 201, Richmond Vermont USA
Certificate holder address:	60 Portland Road, PO Box 425, HAMILTON, VIC, 3300	Scope:	National, State and Bioregions. WA Bioregions: Jarrah Forest (JF), Esperance Plains (ESP) and Warren (WAR) Vic/SA Bioregions: South East Coastal Plain (SCP), Southern Volcanic Plain (SVP), Victorian Midlands (VIM),

			<p>Naracoorte Coastal Plain (NCP) and Murray Darling Depression (MDD).</p> <p><u>WWF Bioregions</u> Deserts and Xeric Shrublands Mediterranean Forests, Woodlands and Scrub Temperate Broadleaf and Mixed Forest Temperate Grasslands, Savannas and Shrublands</p>
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SUMMARY:

Category	Summarized risk determination
1. Legality	LOW
2. Civil rights	LOW
3. HCV	UNSPECIFIED
4. Conversion	LOW for Vic, NSW, QLD, WA, SA, UNSPECIFIED for NT, Tas
5. GMOs	LOW

FSC category	FSC indicator	Sources used	Justification	Scale of assessment	Risk level
1. Illegally harvested wood. The district of origin may be considered low risk in relation to illegal harvesting when all the following indicators related to forest governance are present:	1.1 Evidence of enforcement of logging related laws in the district	<p><u>Minimum List of Applicable Legislation in accordance with ADV-40-005-19</u></p> <p><u>1.0 Legal rights to harvest</u> <i>Planning and Environment Act 1987 (Vic)</i> <i>Code of Practice for Timber Production 2014 (Vic)</i> <i>The Australian Illegal Logging Prohibition Act (Cwth) (2012).</i></p> <p><u>2.0 Taxes and Fees</u> <i>Corporations Act 2001 (Cwth)</i> <i>Income Tax Assessment Act 1997 (Cwth)</i> <i>Good and Service Tax Act 1999 (Cwth)</i></p> <p><u>3.0 Timber Harvesting Activities</u> <u>Victoria</u> <i>Code of Practice for Timber Production 2014</i> <i>Catchment and Land Protection Act 1994</i> <i>Water Act 1989</i></p>	<p>Each State has various regulators responsible for implementing and enforcing State legislation.</p> <p>All Australian jurisdictions have in place strong legislative, regulatory and practice (generally in the form of Forest Practices Codes) instruments which are used both to guide and enforce the application of legal requirements for forest operations and timber harvesting (for public and private forests and plantations). Code violations are relatively rare and not normally on a scale envisaged to encompass illegal logging. However, serious, knowing or continuing breaches of the code can constitute contravention of the law.</p> <p>ABP undertakes harvesting for</p>	State	Low

		<p><i>Wildlife Act 1975</i> <i>Country Fire Act 1958</i> <i>Extractive Industries Development Act 1995</i> <i>Electrical Safety (Network Assets) Regulations 1999</i> <i>Aboriginal Heritage Act 2006 and Regulations 2007</i> <i>Occupational Health Safety Act 2004 and Regulations</i> <i>Flora and Fauna Guarantee Act</i> <u><i>Planning and Environment Act 1987</i></u> <u>South Australia</u> <i>Natural Resources Management Act 2004 and Regulations 2006</i> <i>Environment Protection (Water quality) 2003</i> <i>Environment Protection Act 1993</i> <i>National Parks and Wildlife Act 1972</i> <i>Plant Health Act 2009 (SA)</i> <i>Prevention of Cruelty to Animals Act 1985</i> <i>Work Health and Safety Act and Regulations</i> <u>Western Australia</u> <i>Animal Welfare Act 2002</i> <i>Biosecurity and Agriculture Management Act 2007</i> <i>Conservation and Land Management Act 1989</i> <i>EP Act 1986 and Regs 1987</i> <i>Environment Protection (clearing of Native Vegetation) Regulations 2004</i> <i>Soil and Land Conservation Act 1945</i> <i>Wildlife Conservation Act 1950</i> <i>Bush Fires Act 1954</i></p>	<p>private supply of wood and does so in accordance with ABP's internal procedures. In addition, regular harvesting inspections are carried out which examine many of the legislative requirements. Contractors are also audited by ABP and independent auditors against relevant legal requirements.</p> <p>Suppliers that undertake their own harvesting are assessed for their management system.</p> <p>Continued breaches of legal requirements as detected through inspections or compliance and verification audits (under category 3) shall require review of the low risk designation for category 1.</p>		
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	<p>1.2 There is evidence in the district demonstrating the legality of harvests and wood purchases that includes robust and effective systems for granting licenses and harvest permits.</p>	<p>State authority's records of forest audits</p>	<p>All forest codes of practice are audited by the relevant state or territory</p>	<p>State</p>	<p>Low</p>

	1.3 There is little or no evidence or reporting of illegal harvesting in the district of origin.	State authority's records of forest audits	All forest codes of practice are audited by the relevant state or territory	State	Low
	1.4 There is a low perception of corruption related to the granting or issuing of harvesting permits and other areas of law enforcement related to harvesting and wood trade.	Transparency International maintains regularly updated information on perceptions of corruption at the national level (http://www.transparency.org)	According to Transparency International CPI for this country is 8,6 (CPI is higher or equal to 5)	National	Low
2. Wood harvested in violation of traditional or civil rights. The district of origin may be considered low risk in relation to the violation of traditional, civil and collective rights when all the following indicators are present:	2.1 There is no UN Security Council ban on timber exports from the country concerned	Global Witness http://www.globalwitness.org/pages/en/forests.html	There is no UN Security Council export ban in the country. According to Global Witness there is currently export ban on Liberia.	National	Low
	2.2 The country or district is not designated a source of conflict timber (e.g. USAID Type 1 conflict timber)	Conflict timber: Dimensions of the Problem in Asia and Africa Volume I Synthesis Report (available at www.usaid.gov)	The country is not associated with or designated as source of conflict timber according to latest available research.	National	Low
	2.3 There is no evidence of child labour or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the district concerned.	Global Child labour trends 2000 to 2004. ILO (International Labour Office). (available at: http://www.ilo.org/ipecinfo/product/viProduct.do?productId=2299)	No evidence of child labour or violation of ILO fundamental principles on a remarkable scale is known to occur.	National	Low
	2.4 There are recognized and equitable processes in place to resolve conflicts of substantial magnitude pertaining	Indigenous cultural heritage is managed through state based agencies and state based regulations and legislation	No evidence that current legislation and related practices are not recognised or equitable. Note that FSC Australia has set up an Indigenous Steering Committee that may result in	State	Low

	to traditional rights including use rights, cultural interests or traditional cultural identity in the district concerned.		receiving information that could result in a review of the risk level.		
	2.5 There is no evidence of violation of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in the forest areas in the district concerned.	No evidence is known	There is no evidence of violation of the ILO convention taking place in forest areas of district concerned. Note that FSC Australia has set up an Indigenous Steering Committee that may result in receiving information that could result in a review of the risk level.	State	Low
3. Wood harvested from forest in which high conservation values are threatened by management activities The district of origin may be considered low risk in relation to threat to high conservation values if: a) indicator 3.1 is met; or b) indicator 3.2 eliminates (or greatly mitigates) the threat posed to the district of origin by non-compliance with 3.1.	3.1 Forest management activities in the relevant level (eco-region, sub-eco-region, local) do not threaten eco-regionally significant high conservation values.	Those regions identified by Conservation International as a Biodiversity Hotspot http://www.biodiversityhotspots.org/xp/hotspots/Pages/default.aspx . Those forest, woodland, or mangrove ecoregions identified by World Wildlife Fund as a Global 200 Ecoregion and assessed by WWF as having a conservation status of endangered or critical. If the Global 200 Ecoregion comprises more than a single terrestrial ecoregion, an ecoregion within the Global 200 Ecoregion can be considered low risk if the sub-ecoregion is assessed with a Conservation Status other than "critical/endangered" http://www.nationalgeographic.com/wildworld/profiles/g200_index.html Those regions identified by the World Resources Institute as a Frontier	HCV exists in all bioregions, hence 3.1 applies	Bioregion (IBRA) (see map in Appendix 1)	Unspecified

		<p>Forest Intact Forests Landscapes, as identified by Greenpeace (www.intactforests.org) Info on IBRA bioregions found at http://www.environment.gov.au/parks/nrs/science/bioregion-framework/ibra/index.html.</p>			
	<p>3.2 A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the ecoregion.</p>	<p>FSC International advice is that national or state legislative controls can be accepted if:</p> <p>a) A (national) legal system of protection is in place (and this is widely accepted by stakeholders as providing adequate protection)</p> <p>b) The effectiveness of law enforcement in the country can be demonstrated through a high rating ($\geq 75\%$) in the World Bank "rule of law" index (www.govindicators.org)</p>	<p>Current legislation, programs and tools such as the Comprehensive, Adequate and Representative (CAR) reserve system based on the JANIS criteria and the Regional Forest Agreements (RFAs) have not passed the test of wide stakeholder acceptance as 'strong system of protection'. Evidence exists that HCV are still being impacted across Australia. Therefore, risk remains unspecified at the Annex 2 level.</p> <p>ABP's examination of the HCV control system for small private suppliers shows:</p> <p>For Small Private Suppliers For all private wood sources where the owner has not completed their own harvest plan and assessment of high conservation values, ABP will conduct these on behalf of the grower. An assessment of all plantations for harvest is done against the HCV criteria at the sale and purchase agreement stage. An owner's declaration is used to identify any known</p>	<p>Bioregion (IBRA) (see map in Appendix 1)</p>	<p>Unspecified</p>

			values. For other supply from uncertified private growers at either the stump or the mill gate, ABP will inspect 100% of all supplying compartments.		
4. Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses The district of origin may be considered low risk in relation to conversion of forest to plantations or non-forest uses when the following indicator is present:	4.1 There is no net loss AND no significant rate of loss (> 0.5% per year) of natural forests and other naturally wooded ecosystems such as savannahs taking place in the eco-region in question.	State of the World's Forests 2009. FAO (Food and Agriculture Organization of the United Nations). 2009. This is the most latest available data (dated 2005) about annual change rate of forest cover. (Available at http://www.fao.org/docrep/009/a0773e/a0773e00.htm). HOWEVER THIS INFORMATION DOES NOT ADDRESS PLANTATION ISSUE. For guidance to sourcing in Tasmania, see http://www.fscaustralia.org/files/100/controlled%20wood%20guidance%20note%20nov%202008.pdf	According to last FAO report (State of World's Forests 2007) forest area annual net loss is - 0,1% (= < 0,5% per year). Evidence exists that conversion of native forest is still taking place in NT (eg Tiwi Islands) and areas of Tasmania (with existing licences still valid after new legislation stopping conversion on public land only was introduced in 2006).	State	Low Risk - Victoria, NSW, QLD, WA, SA. Unspecified - TAS & NT
5. Wood from forests in which genetically modified trees are planted The district of origin may be considered low risk in relation to wood from genetically modified trees when one of the following indicators is complied with:	a) There is no commercial use of genetically modified trees of the species concerned taking place in the country or district concerned	The Gene Technology Act 2000	According to the latest available FAO study ("Preliminary review of biotechnology in forestry, including genetic modification", 2004. (available at http://www.fao.org/docrep/008/ae574e/ae574e00.htm), there is no commercial usage of any GM trees in the country. In Australia, GMO's are regulated by the Gene Technology Act which is administered by the Office of the Gene Technology Regulator	National	Low

			(OGTR). Current search (March 09) for licences shows no licenses given for tree species.		
	b) Licenses are required for commercial use of genetically modified trees and there are no licenses for commercial use	The Gene Technology Act 2000	Licenses are required under the Gene Technology Act, which is regulated by the Office of the Gene Technology Regulator (OGTR). Current search (March 09) for licences shows no licenses given for tree species. http://www.maps.ogtr.gov.au/jsp/index.jsp	National	Low
	c) It is forbidden to use genetically modified trees commercially in the country concerned	The Gene Technology Act 2000	Currently illegal to use genetically modified trees for commercial purposes	National	Low

Mixing risk assessment for FSC controlled wood		Project / Work Description:
Risk Assessment Team (Name/s): Carl Richardson, Mark Diedrichs, Charlie Saykao, Barry Pledger and Leanne Tomlinson		Approved By Supervisor / Reporting Officer: (Name, Date & Signature)
Date Conducted: 22/3/2017	Next Review Date: 22/3/2018	

Step	Hazard Identification	Risk Evaluation and justification	Control Measure
Harvest	Taking wood from blocks that are not covered under the Due Diligence system (DDS).	Very low	No wood is accepted outside of the DDS. Wood accepted is either FSC certified or controlled wood. This is evidenced by delivery dockets.
Ports	Wood from unacceptable sources being mixed with certified wood at Albany Chip Terminal or Portland Chip Terminal	Very low	No wood is accepted outside of the DDS. Wood accepted is either FSC certified or controlled wood. This is evidenced by delivery dockets and chipper notes.

Risk Mitigation

The basis of the control measures

The suppliers are all contracted to supply trees. Harvest contractors are contracted for harvesting of trees.

The supplier approval process is undertaken at the wood supply contract stage.

ABP will review contractors for compliance to certain contract requirements which will include various OHS items and a review of the control measures used to protect HCV.

Ongoing monitoring of the control measures

ABP stipulate control measures for HCV in the Timber Harvest Plan. Control measures are then checked through visits to sites during harvest operations and documented using the Harvesting QA. A record of these visits and the checks made will be kept by ABP.

Control measures for private (non-certified suppliers) and harvest contractors

Private suppliers

For all private wood sources where the owner has not completed their own harvest plan and assessment of HCV, ABP will conduct these on behalf of the grower. An assessment of all plantations for harvest is done against the HCV Evaluation Framework at the sale and purchase agreement stage. An owner's declaration is also used to identify any known values.

For other supply from uncertified private growers at either the stump or the mill gate, ABP will inspect 100% of all supplying compartments. The harvest plans will incorporate control measures which are consistent with the HCV Evaluation Framework.

Harvesting contractors

Control measures for HCV are checked through visits to sites during harvest operations and documented using the Harvesting QA.

The minimum frequency is once per month or per plantation.

Procedures for comments and complaints from stakeholders relating to the DDS.

This procedure is used for stakeholder consultations and instances where there are comments or complaints from stakeholders. Formal stakeholder consultations will take place when the DDS is first set up and subsequently only whenever a risk designation of control measure changes. Comments and complaints may occur at any time.

Stakeholder identification

ABP shall identify affected and interested stakeholders in relation to the forest management activities of their suppliers and the identified risk, including the stakeholder groups listed below (see section 4.8).

Stakeholder notification

Identified stakeholders will be invited to participate in the consultation at least six (6) weeks prior to the change to the DDS or related control measures that is the subject of the consultation. ABP Pty Ltd shall employ effective means to inform stakeholders, using culturally appropriate consultation techniques. FSC Australia will be involved in the consultation both as a stakeholder and as a conduit to invite stakeholder comments via the FSC Australia web page.

Stakeholder engagement techniques

Techniques to reach out to stakeholders may include face to face meetings, personal contacts by phone, email, or letter, and on relevant websites (eg. FSC Australia).

Stakeholder consultation

All identified stakeholders are provided access to information that is relevant to the consulted issue no later than six (6) weeks prior to the change to the DDS that is the subject of the consultation. ABP Pty Ltd only excludes information that is considered confidential. In such cases a justification for the confidential nature of the information is presented to the FSC certification. If there is a requirement to publish the comments stakeholders will be asked to provide their consent to the publication of their comments.

Stakeholder feedback

Within sixty (60) days after the end of the consultation period, ABP Pty Ltd will respond to all stakeholders who participated in the consultation process, to explain how their comments were taken into account.

Consultation records

ABP Pty Ltd maintains records of the consultation process, including a list of stakeholders consulted and their comments, and evidence that the consultation was carried out in line with the requirements of this standard.

Content of the report

ABP will prepare a report of the consultation process, which includes:

- a) The areas for which the stakeholder consultation has been conducted (e.g. geo-reference data, state, province, supply unit);
- b) A list of the stakeholders groups invited by ABP to participate in the consultation;
- c) A summary of the stakeholder comments received. These will not normally be published but if they are comments, these are only be published with prior consent from the consulted stakeholder and not associated with stakeholder names;
- d) A description of how ABP has taken stakeholder comments into account;

- e) The organisation's justification for concluding the material sourced from these areas can be used as controlled material or sold with the FSC Controlled Wood claim of the certification process, according to Section 6 of the controlled wood standard.

Stakeholders groups

Groups or individuals representing the interests listed below, that are relevant and according to identified risk, will be identified and added to a stakeholder database and notified during the consultation process. Each group may be represented by an unlimited number of representatives, subject to balanced consideration of the input received during the consultation. The list is not comprehensive and any other stakeholder groups relevant to the certification process may be identified, added to the stakeholder database and notified.

Economic interests

- a) Forest owners and/or managers of large, medium and small forests, and high, medium, and low-intensity managed forests;
- b) Forest contractors (including loggers);
- c) Representatives of forest workers and forest industries;
- d) Certificate holders.

Social interests

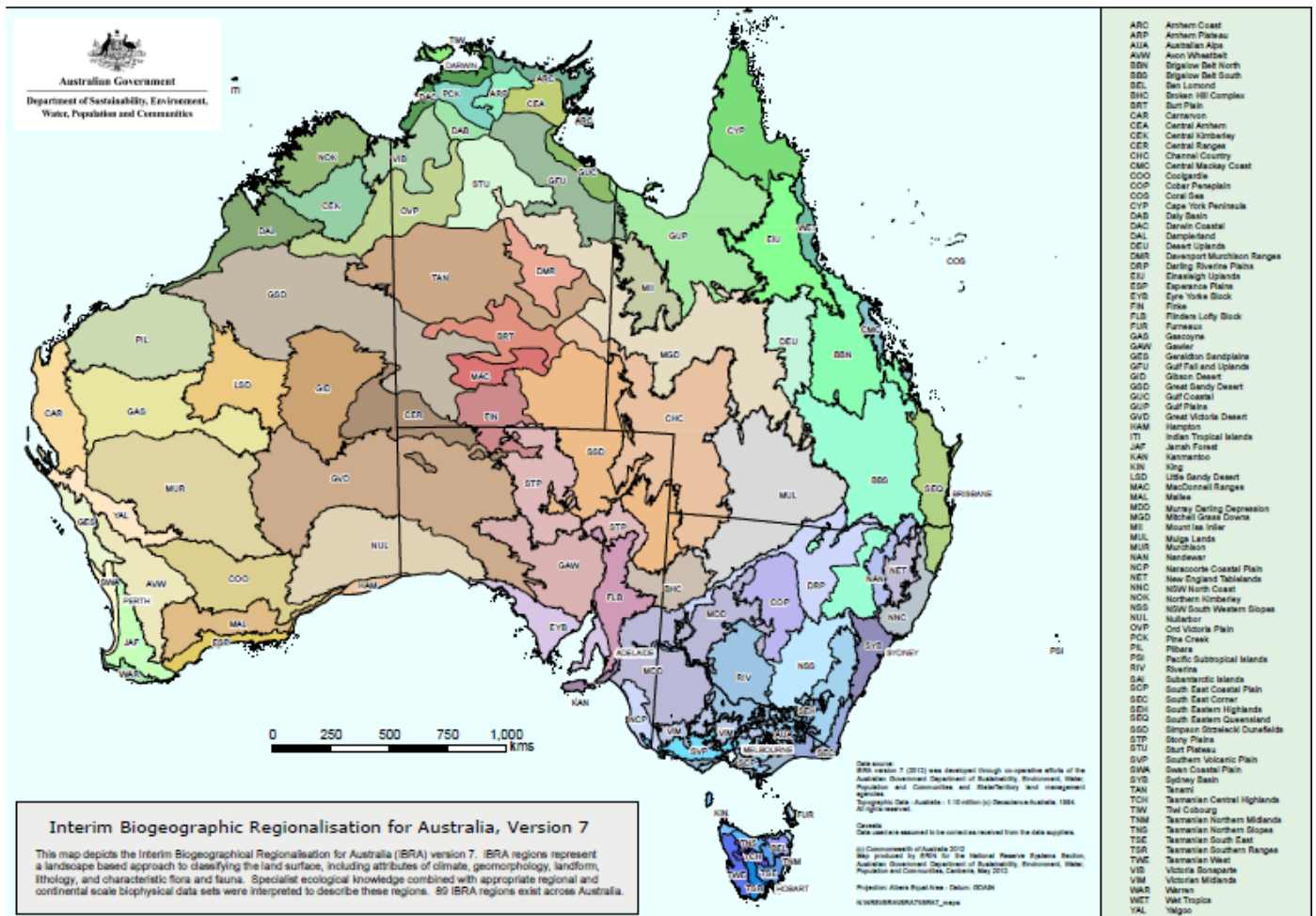
- a) NGOs involved or with an interest in social impacts of forest management and other related operations;
- b) Forest workers;
- c) International, national and local trade/labour unions;
- d) Representatives of local communities involved or with an interest in forest management, including those relevant for HCVs 5 and 6;
- e) Representatives of Indigenous Peoples and/or traditional peoples (if present and/or holding rights), including those relevant for HCVs 5 and 6;
- f) Representatives of recreational interests.

Environmental interests

- a) NGOs involved or with an interest in the environmental impacts of forest management. Consultation should target the following areas of interest and expertise - Biological diversity; water and soil; and HCVs 1-4
- b) Local communities and Indigenous Peoples' representatives (HCVs 5 and 6).
- c) FSC-accredited certification bodies active in the country
- d) National and state forest agencies
- e) Experts with expertise in controlled wood categories
- f) Research institutions and universities
- g) FSC Australia

Complaints about the DDS. Complaints about the DDS are handled through the complaint procedures documented in the Stakeholder Engagement Policy and Procedure which can be found on ABP's website at <http://www.austgum.com.au/australian-plantations-woodchips/policies.html>

Appendix 1 IBRA bioregions



Appendix 2 WWF Terrestrial ecoregions

