



# Controlled Wood Risk Assessment and Mitigation Plan

2023



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Visy is a global leader in packaging and resource recovery. Our innovation, manufacturing and logistic capabilities are organised around an integrated closed loop and include paper, primary packaging, fibre packaging, packaging supplies and consumables, point of sale displays, automation, materials handling, logistics and recycling. Together, they give life to tailored solutions that deliver enduring value for our customers.

# About this report

## Intent

To assess the risk of procuring softwood fibre used at Visy Pulp and Paper Tumut for the manufacture of paper products from unacceptable sources. The geographical origin and the complexity of the supply chain will both be assessed.

The Due Diligence, Risk and Mitigation is documented and aligned with *FSC-STD-40-005 Requirements for Sourcing FSC Controlled Wood version 3-1*, *FSC HCV Evaluation Framework* and application of a Due Diligence System for compliance with the *Illegal Logging Prohibition Act 2012* (Cth).

## VISY'S RESPONSIBLE SOURCING COMMITMENT

Visy is committed to conducting a comprehensive ongoing assessment of its raw material supplies to the source

## Why?

To avoid sourcing from unacceptable sources ("FSC Controlled Wood Categories") which may include illegally harvested wood, wood harvested in violation of traditional and human rights, wood harvested in forests where high conservation values are threatened by management activities, wood harvested in forests being converted to plantations or non-forest use, or wood from forests in which genetically modified trees are planted.

To implement a system of recognition for verification of the origin of wood or other forest products procured directly from forestry operations or supplied by primary processors in the form of wood residues.

### Social

**"Ensuring employees and communities are not negatively affected throughout the entire supply chain"**

### Environment

**"Maintaining or enhancing the natural environment from where the material is sourced"**

### Business

**"Ensuring appropriate agreements are established and maintained with suppliers throughout Visy's supply chain"**

## How?

1. Visy's Fibre & Forestry Manager and Program Manager – Fibre Stewardship will complete a review of every current and new fibre supplier and new supply area.
2. Control measures will be implemented by Visy for suppliers or supply areas classified as 'specified risk' for supply of wood and wood products from unacceptable sources. The definition of unacceptable source is as described by FSC Controlled Wood standard FSC-STD-40-005.
3. Control measures will be implemented by Visy for suppliers or supply areas classified as 'specified' for risk of mixing in the supply chain.
4. The risk assessment and established control measures will be communicated to Visy's stakeholders and feedback sought.
5. Outcomes of controlled measures and stakeholder communications will be shared publicly where permission is given.



## Risk assessment scope

Table 1 - Visy Pulp and Paper FSC Controlled Wood certification details

Company Name	Visy Pulp and Paper Pty Ltd - Tumut Mill		
Company Address	1302 Snowy Mountains Hwy, Tumut NSW 2720		
Chain of Custody No	SCS-COC-002636	Controlled Wood Code	SCS-CW-002636
Certification Body	SCS Global Services		
Scope of the Assessment	Pulp logs and Sawmill chip procured from Ecoregion: Temperate Broadleaf and Mixed Forest for the purposes of Kraft paper manufacturing at Visy Pulp and Paper – Tumut Mill.		

### Ecoregion and category

Plantation sources to Visy Pulp and Paper are originating from:

Ecoregion Category:

1. Temperate Grasslands, Savannas and Shrublands
2. Temperate Broadleaf and Mixed Forest
3. Montane Grasslands and Shrublands
4. Mediterranean Forests, Woodlands and Scrub

### Abbreviations

HCV – High Conservation Values

SIR – Scale Intensity and Risk

FSC – Forest Stewardship Council

NRA – National Risk Assessment

THP – Timber Harvest Plan

Visy – refers to Visy Pulp and Paper Pty Ltd;  
1302 Snowy Mountains Hwy, Tumut, NSW

LALC – Local Aboriginal Land Council(s)

SSP – Site Safety Plan

### FSC Controlled Wood categories

1. Illegally harvested wood
2. Wood harvested in violation of traditional or human rights
3. Wood harvested from forest in which high conservation values are threatened by management activities
4. Wood harvested from forests being converted to plantations or non-forests uses
5. Wood from forests in which genetically modified trees are planted



# Wood supply summary

NOTE: All wood supply is softwood from plantation origin. No native timbers are used.

The origin of supply for softwood pulplogs and sawmill chip is categorised below using local council boundaries as the geographic reference.

During 2023-2024, Visy plans to source plantation-grown softwood logs and sawmill chips from plantation-grown timber from various suppliers throughout the ACT, NSW (including from the local government areas of Snowy Valleys, Great Hume, Snowy Monaro, Gundagai, Bathurst, Queanbeyan-Palerang, Oberon, Lithgow, Carbone, Wingecarribee, Goulburn Mulwaree, Trowong), Victoria (including from the local government areas of East Gippsland, Indigo, Colac Otway, Moyne, Glenelg, West Wimmera, Moorabool, Golden Plains and Pyrenees) and South Australia (from Wattle Range local government area).

Visy obtains fibre from two different types of suppliers:

1. Pulplog Suppliers (both standard scale, intensity and risk (SIR) and low SIR)
2. Sawmill (chip) Suppliers (or "Sawmills")

Pulplog suppliers to Visy generally have multiple plantations across a large area and are supplying Visy with significant volumes of wood fibre annually. These suppliers have sophisticated systems and specialised resources in place to ensure that all wood fibre supplied from their harvest operations is assessed for a number of risk indicators and managed responsibly.

Large suppliers have documented policies and procedures for gathering data on all High Conservation Values (HCV) risks relevant to the plantations they manage and/or own and generate their own harvest plans with required prescriptions for the protection of identified HCVs. Visy's pulplog suppliers have a long history of compliance with legislative frameworks for each state of operation, as well as compliance with forestry management codes of practice above beyond the requirements of such legislation.

These suppliers are classified as standard Scale Intensity and Risk (SIR) operations or Standard SIR for the purposes of this risk assessment.

Visy also procures pulplogs from operators who are classified as low Scale Intensity and Risk (SIR) operations or Low SIR for the purposes of this document. They generally supply small volumes of pulplogs, which may form a regular supply, be intermittent, or fulfil a 'one off' supply agreement.

Visy has dedicated, qualified foresters, either directly employed or contracted to Visy, to oversee the assessment and responsible management of these smaller suppliers. This includes identifying any HCVs that may be present in the plantation and formalising the harvest plan, including prescriptions for identified HCVs.

Additionally, regular on-site monitoring is conducted by Visy's qualified foresters to ensure compliance with the THP. Records of all on-site inspections are retained and assessed by Visy's third-party certification body (if required).

Sawmill (chip) Suppliers supply softwood chips to Visy that are produced from sawlogs from the above-mentioned supply sources. Visy conducts supplier audits on the Sawmills annually to confirm the suppliers of wood fibre to the Sawmills are the same as those listed in Visy's supplier register for the direct provision of pulplogs. During the audit, a Visy representative will review delivery dockets, haulage slips and invoices. In addition to the on-site audit, Visy reconciles the supplier list from all Sawmills regularly.

Additionally, the site is assessed for their ability to maintain records and operate an effective management system for qualifying wood suppliers. Where Visy is notified of a new supplier to the sawmill, a due diligence process, involving an in-field audit, will be conducted prior to wood arriving at Visy.

# FSC Australia risk assessment

The *National Risk Assessment (NRA) for Australia (FSC-NRA-AU V1-1)* has been used to assist Visy to determine risk of sourcing virgin fibre from unacceptable sources. It is comprised of 5 controlled wood categories:

1. Illegally harvested wood;
2. Wood harvested in violation of traditional and human rights;
3. Wood from forests in which high conservation values are threatened by management activities;
4. Wood from forests being converted to plantations and non-forest use; and
5. Wood from forests in which genetically modified trees are planted.

The FSC Australia Controlled Wood Risk Assessment has adopted a number of assessment scales to ensure that the 'low' or 'specified' risk can be applied at a national, state, bioregional or forestry type level.

The assessment indicates a nominated risk designation for softwood plantations within NSW, ACT and Victoria as 'Low' for controlled wood categories 1, 2, and 5 for the relevant supply areas to Visy (Australia – NSW, Victoria, ACT, Sth Australia). A risk designation of 'Specified Risk' applies for controlled wood category 3 (HCVs 4 and 6) and controlled wood category 4.

As HCVs 4 and 6 exist in Softwood Plantations in all sourcing areas, Visy must assess and mitigate the risk by ensuring Visy's suppliers have a strong system in place at that supply level for the preservation of these HCVs.

Visy has used the *FSC Australia High Conservation Values Evaluation Framework* as well as *Annex E* of the *FSC-STD-40-005 Requirements for Sourcing FSC Controlled Wood v3-1*, in the development of control measures to ensure Visy's suppliers use the appropriate tools to assess the presence of HCVs and manage these appropriately.

Visy has conducted a risk assessment and mitigation process based on the Origin and Supply Chain risk of accepting unacceptable sources against the relevant, specified HCVs.

A summary of potential risks associated with the conversion of forest to plantation or non-forest use, within the geographical origin of supply, is stated below. See *table 4*.

The FSC Australia Risk assessment summarises the risk assessment sets out the risks in the supply regions used by Visy, this involves only 2 categories of controlled wood.

# Relevant Controlled Wood categories

Table 2 – FSC Australia assessment controlled wood categories relevant to Visy supply

Controlled Wood Category	Findings and Resources	Risk Level
3.4 Basic ecosystem services* in critical situations*, including protection* of water catchments and control of erosion of vulnerable soils and slopes.	<p>Info on IBRA bioregions found at: <a href="http://www.environment.gov.au/land/nrs/science/ibra">www.environment.gov.au/land/nrs/science/ibra</a> along with the specified areas protected under the National Reserve System. Evidence of areas of protection exist in the Eco-regions and Bioregions of relevance.</p> <p>89 Bioregions now exist throughout Australia as per Interim Biogeographic Regionalisation for Australia, Version 7.</p> <p>The Controlled Wood National Risk Assessment for Australia identifies that there may still be a threat of management activities within all Bioregions on HCV 4. The scale of assess for HCV 4 is plantations in All States and Territories.</p>	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk
3.6 Sites, resources, habitats* and landscapes* of global or national cultural, archaeological or historical significance, and/ or of critical* cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities* or Indigenous Peoples*, identified through engagement* with these local communities* or Indigenous Peoples*.	<p>The Controlled Wood National Risk Assessment for Australia documents the unlikelihood that all areas of significance have been identified across all plantations in all states and territories. As a result, information on the location of sites of significance may not be accurate mapped.</p> <p>Additionally, areas of significance are noted to be present within plantation boundaries within all states and prescriptions must be established.</p> <p><a href="https://www.environment.nsw.gov.au/topics/heritage/about-heritage/aboriginal-cultural-heritage">https://www.environment.nsw.gov.au/topics/heritage/about-heritage/aboriginal-cultural-heritage</a></p> <p><a href="http://www.aboriginalvictoria.vic.gov.au/victorian-aboriginal-heritage-register">www.aboriginalvictoria.vic.gov.au/victorian-aboriginal-heritage-register</a></p> <p><a href="https://www.agd.sa.gov.au/aboriginal-affairs-and-reconciliation/aboriginal-heritage/aboriginal-heritage-registers-and-the-central-archive/register-of-aboriginal-sites-and-objects">https://www.agd.sa.gov.au/aboriginal-affairs-and-reconciliation/aboriginal-heritage/aboriginal-heritage-registers-and-the-central-archive/register-of-aboriginal-sites-and-objects</a></p>	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk
4. Wood from forests being converted to plantations or non-forest use.	<p>Existing legislative frameworks exist within NSW, ACT, Victoria and South Australia which aims to discourage through legislative vehicle, the clearing of native land for other use.</p> <p>These include the <i>Environmental Protection and Assessment Act (1979)</i>, <i>Plantations and Reafforestation Act 1999 (NSW)</i>, <i>Planning and Environment Act (1987)</i> and the <i>Native Vegetation Act 1991 (SA)</i> and the <i>ACT Nature Conservation Act 2014 (ACT)</i></p>	<input type="checkbox"/> Low Risk <input checked="" type="checkbox"/> Specified Risk

The risk mitigation processes adopted for the various supplier categories are set out in the sections that follow.

# Pulplog supplier – control measures

Table 3 – Risk mitigation process (origin) for standard and low SIR pulplog operations

Controlled Wood Category	Existing Control Measures	Risk Score	Visy's Existing Control Measures	Revised Risk Score
CW Category 3.4 HCV 4 - Critical ecosystem services. Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.	<p>The FSC Australia HCV Evaluation Framework (v2-0) states that suppliers are required to:</p> <ol style="list-style-type: none"> <li>1. Consult the Best Available Information to identify relevant datasets and prepare lists and maps of potential HCV accordingly.</li> <li>2. Consult experts and other knowledgeable stakeholders to identify HCVs.</li> <li>3. Undertake a threat assessment of management activities on identified HCVs.</li> <li>4. Identify Control Measures required to maintain identified HCVs</li> <li>5. Consult stakeholders on assessment and Control Measures.</li> <li>6. Implement Control Measures.</li> </ol> <p><b>Mandatory Control Measures</b> include the adherence of relevant harvesting codes of practice (both voluntary and mandatory). In circumstances where there is high risk of erosion or history of issues related to erosion then additional management measures may be required.</p> <p><b>Recommended Management Strategies</b> to maintain areas identified under HCV 4 may include protection zones, harvest prescriptions, chemical use restrictions, and/or prescriptions for road construction and maintenance.</p> <p>Existing legislative frameworks exist within NSW, Victoria, ACT and South Australia which aim to discourage through legislative vehicle, activities that impact on critical ecosystem services.</p> <p>These include the <i>Plantations and Reafforestation Act 1999 (NSW)</i> and the <i>Forest Practices Code (NSW)</i>, the <i>Sustainable Forests (Timber) Act 2004 (Vic)</i> and the <i>Code of Practice for Timber Production 2014 (Vic)</i>, the <i>Native Vegetation Act 1991 (SA)</i> and the <i>ACT Nature Conservation Act 2014 (ACT)</i>.</p>	Specified	<p>Visy will complete the control measures as stated in the High Conservation Evaluation Framework (v2-0). In addition, Visy has implemented the control measures listed below.</p> <p>Visy conducts a supplier approval process for all pulplog suppliers.</p> <p>Visy's Standard SIR pulplog suppliers who are not FSC Certified shall participate in an annual audit of their HCV identification and management systems, including confirmation that 'best available information' is used in the assessment process.</p> <p>This audit shall review the results of any third party audits regarding HCV 4. This audit is typically conducted at both planning and management levels.</p> <p>Additionally, in-field audits will be conducted to review application at an operational level.</p> <p>For Low SIR suppliers, Visy will conduct annual in-field audits based on a sampling regime, geographic location and risk.</p> <p>Visy will engage with interested and affected stakeholders annually on the effectiveness of control measures unless a significant change to the risk arises between scheduled annual engagements arise, in which case the engagement will occur as soon as possible after such change occurs.</p> <p>Pulplog suppliers conduct regular operational monitoring. Management prescriptions as stated in the harvest plan are reviewed for compliance and adequacy by the supplier. This process will be reviewed during the annual audit.</p> <p>Thinning operations managed by Visy contracted harvest crews will be reviewed by Visy's dedicated forester for compliance to harvest and haulage codes of practice and adherence to any specified prescriptions detailed in the THP.</p> <p>HCV training is provided to Visy personnel and key suppliers to Visy including contract harvest crew operators, foresters and planners.</p>	Low

Table 3 – Risk mitigation process (origin) for standard and low SIR pulplog operations – *Continued*

Controlled Wood Category	Existing Control Measures	Risk Score	Visy's Existing Control Measures	Revised Risk Score
CW Category 3.4 HCV 4.1 – Areas that provide protection* from flooding (Not required for Low SIR)	<p>See mandatory and recommended actions above from the HCV Evaluation Framework (v1-1).</p> <p>Existing legislative frameworks exist within NSW, Victoria and South Australia which aim to discourage harvest activities through legislative vehicles, conducted at times that would be detrimental to rainfall run-off. These include <i>South Eastern Water Conservation and Drainage Act 1992 (SA)</i>, <i>Plantations and Reafforestation (Code) Regulations 2001 (NSW)</i>. Other widely used voluntary frameworks include the <i>Forest Practices Code 2005 (NSW)</i> and the <i>Code of Practice for Timber Production 2014 (Vic)</i>.</p> <p>The plantation planning process takes into account the minimisation of issues such as slope, erosion control and water catchment management. Exclusion and buffer zones, seasonal harvest arrangements along with modified roading plans are also additional methods currently used by the suppliers.</p> <p>Visy's largest supplier is Forestry Corporation of NSW (FCNSW). Currently, FCNSW softwood plantations occupy only 1% – 6% of land in any given water catchment area. This area is not considered to cause any measurable impact to water quality within a catchment area (Forest and Wood Products Research and Development Corporation, 2004).</p>	Specified	<p>Visy undertakes the supplier assessments and monitoring as mentioned above (HVC 4), with specific review of the following best available information for HCV 4.1*:</p> <ol style="list-style-type: none"> <li>1. Appropriate classification of soil types.</li> <li>2. Evidence of landscape level planning processes and applicable mapping.</li> <li>3. Evidence that correct and effective exclusion zones are included during the planning process especially in relation to drainage lines and other waterway classifications.</li> <li>4. Appropriate roading plans suited to soil, weather and operational requirements.</li> </ol> <p>* reviewed during the audit process</p>	Low

Controlled Wood Category	Existing Control Measures	Risk Score	Visy's Existing Control Measures	Revised Risk Score
CW Category 3.4 HCV 4.2 – Areas that provide protection* from erosion	<p>See mandatory and recommended actions above from the HCV Evaluation Framework (v1-1).</p> <p>Management of soil and water values involves site specific actions undertaken in each harvest unit to mitigate the impact to the soil and water environments. These requirements are formally audited by the NSW EPA and the NSW DPI in the case of authorised plantations. HVP Plantations are audited by local Victorian Shire Councils, as divulged by EPA (and as stated in the Planning and Environment Act 1987), internally, and by certifying bodies for compliance with FSC and Responsible Wood standards.</p> <p>Legislation governing the protection from activities causing erosion include the <i>Plantations and Reafforestation Act 1999 (NSW)</i> and the <i>Forest Practices Code 2005 (NSW)</i>, the <i>Code of Practice for Timber Production 2014 (Vic)</i>, the <i>Native Vegetation Act 1991 (SA)</i>, The Code of forest practice in South Australia (Guidelines for Plantation Forestry in South Australia, 2009) and the <i>ACT Nature Conservation Act 2014 (ACT)</i>.</p>	Specified	<p>Visy undertakes the HCV supplier assessments and monitoring as mentioned above (HVC 4), with specific review of the following best available information for HVC 4.2*:</p> <ol style="list-style-type: none"> <li>1. Appropriate classification of soil types.</li> <li>2. Evidence that correct and effective exclusion zones are included during the planning process especially in relation to drainage lines and other waterway classifications.</li> <li>3. Appropriate use of remnant vegetation areas to prevent areas at risk of erosion.</li> <li>4. Appropriate roading plans suited to soil, weather and operational requirements.</li> </ol> <p>* reviewed during the audit process</p>	Low

Table 3 – Risk mitigation process (origin) for standard and low SIR pulplow operations – *Continued*

Controlled Wood Category	Existing Control Measures	Risk Score	Visy's Existing Control Measures	Revised Risk Score
CW Category 3.4 HCV 4.3 – Areas that provide barriers to the spread of destructive fires (Not required for Low SIR)	<p>See mandatory and recommended actions above from the HCV Evaluation Framework (v1-1).</p> <p>Fire is addressed in legislative frameworks which govern the requirements of the land manager to take specific steps to ensure effective fire management.</p> <p>NSW – <i>Plantations and Reafforestation (Code) Regulations 2001, Forest Practices Code 2005 (NSW)</i></p> <p>South Australia - <i>Fire and Emergency Services Act 2005, The Code of forest practice in South Australia (Guidelines for Plantation Forestry in South Australia, 2009)</i></p> <p>Victoria – <i>The Forests Act 1958, Code of Practice for Timber Production 2014 (Vic)</i></p> <p>The recent Royal Commission into National Natural Disaster Arrangements will also guide activities impacting on HCVs as a result of destructive fires.</p> <p><a href="#">The report can be accessed here.</a></p>	Specified	<p>Visy undertakes the HCV supplier assessments and monitoring as mentioned above (HVC 4), with specific review of the following best available information for HCV 4.3*:</p> <ol style="list-style-type: none"> <li>1. Review of fire management plan annually and the evaluation of its effectiveness with a specific focus on preventative measures.</li> <li>2. Identified HCV areas and relevant fire management plans specific to the protection of these HCVs.</li> <li>3. Consideration of the landscape level approach to fire management.</li> </ol> <p>* reviewed during the audit process</p>	Low

Controlled Wood Category	Existing Control Measures	Risk Score	Visy's Existing Control Measures	Revised Risk Score
CW Category 3.4 HCV 4.4 – Areas that provide clean water catchments (Not required for Low SIR)	<p>See mandatory and recommended actions above from the HCV Evaluation Framework (v1-1).</p> <p>Management of water catchment impacts requires a landscape level assessment of areas that may impact water catchments and site specific actions undertaken in each harvest unit to mitigate the impact to these catchments.</p> <p>Existing legislative vehicles apply to the management of forestry operations on water catchments.</p> <p>Within NSW: <i>Plantations and Reafforestation (Code) Regulation</i>. Adherence to this legislation is monitored by the NSW Department of Primary Industries. Additionally, the Forestry Corporation of NSW (FCNSW) <i>Forest Practices Code (2005)</i> is adhered to by FCNSW and widely used voluntarily by all Standard SIR and Low SIR suppliers to Visy.</p> <p>Within Victoria: <i>Soil Conservation and Land Utilization Act, 1958, Land Conservation Act, 1970, Code of Practice for Timber Production 2014 (Vic)</i></p> <p><a href="http://www.data.vic.gov.au/data/dataset/designated-water-supply-catchments">www.data.vic.gov.au/data/dataset/designated-water-supply-catchments</a></p>	Specified	<p>Visy undertakes the supplier assessments and monitoring as mentioned above (HVC 4), with specific review of the following best available information for HCV 4.4*:</p> <ol style="list-style-type: none"> <li>1. Appropriate timing of forestry activities including spraying and harvesting.</li> <li>2. Evidence of a well-integrated and well-implemented water monitoring system for areas within clean water catchment zones.</li> <li>3. Evidence that correct and effective exclusion zones are included during the planning process especially in relation to drainage lines and other waterway classifications.</li> <li>4. Appropriate use of remnant vegetation areas to prevent areas at risk of erosion.</li> <li>5. Appropriate roading plans suited to soil, weather and operational requirements.</li> </ol> <p>* reviewed during the audit process</p>	Low



Table 3 – Risk mitigation process (origin) for standard and low SIR pulplug operations – *Continued*

Controlled Wood Category	Existing Control Measures	Risk Score	Visy's Existing Control Measures	Revised Risk Score
<p>CW Category 3.6</p> <p><b>HCV 6 –</b> Cultural values, sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/ sacred importance for the traditional cultures of local communities or Indigenous Peoples, identified through engagement with these local communities or Indigenous Peoples.</p>	<p>Recommended control measure as stated in the HCV Evaluation Framework (v1-1) include:</p> <p>Management strategies and actions shall aim to maintain HCV Areas* identified under HCV 6 may include protection* zones; target-based protections; landscape*-scale* protections*; harvest exclusions, and/or retention in harvest areas.</p> <p>Mandatory Control Measures as stated in the HCV Evaluation Framework (v1-1) include:</p> <p>Measures for maintaining Indigenous cultural values shall be agreed to with the Indigenous Peoples* connected to* the Management unit*, and/or as directed by state and national laws*.</p> <p>State registered site identifications are used to manage areas of significance during the planning process. Additionally, local knowledge and internal inventories to identify potential values within the harvest area. Some pulplug suppliers have established agreements with local Aboriginal groups to identify and advise on local values as well as live GIS layers with recorded values.</p> <p>A public state registry is available for landowners and management to identify sites of cultural and archaeological significance.</p> <p>For Vic: <i>Aboriginal Cultural Heritage Register and Information System (ACHRIS)</i></p> <p>For NSW: <i>Aboriginal Heritage Information Management System (AHIMS)</i></p> <p>For South Australia: <i>Taa Wika Register of Aboriginal Sites and Objects, part of the Central Archive</i></p>	Specified	<p>Visy conducts a supplier approval process for all new pulplug suppliers.</p> <p>Visy's Standard SIR pulplug suppliers who are not FSC Certified shall participate in an annual audit of their HCV identification and management systems, including confirmation that 'best available information' is used in the assessment process.</p> <p>This audit shall review the results of any third-party audits regarding HCV 6. This audit is typically conducted at both a planning and management level. Additionally, in-field audits will also be conducted to review application at an operational level.</p> <p>For Low SIR suppliers, Visy will conduct annual in field audits based on a sampling regime, geographic location and risk.</p> <p>Visy will engage with interested and affected stakeholders annually on the effectiveness of control measures unless a risk to significant changes between scheduled annual engagements arise, in which case the engagement will occur as soon as possible after such change occurs.</p> <p>Standard SIR pulplug suppliers conduct regular operational monitoring. Management prescriptions as stated in the harvest plan are reviewed for compliance and adequacy by the supplier. This process will be reviewed during the annual audit.</p> <p>Thinning operations managed by Visy contracted harvest crews will be reviewed by Visy's dedicated forester for compliance to harvest and haulage codes of practice and adherence to any specified prescriptions detailed in the THP.</p> <p>HCV training is provided to Visy personnel and key suppliers to Visy including harvest crew operators, foresters and planners.</p>	Low

Controlled Wood Category	Existing Control Measures	Risk Score	Visy's Existing Control Measures	Revised Risk Score
<p>CW Category 3.6</p> <p><b>HCV 6.1 –</b> Aesthetic Values (Not required for Low SIR)</p>	<p>See mandatory and recommended actions above from the HCV Evaluation Framework (v1-1).</p> <p>Australian National Heritage List outlines existing areas of natural significance including UNESCO sites and national parks.</p> <p>See also FCNSW's sustainability plan here, which addresses cultural heritage and the aesthetic values that are managed.</p>	Specified	<p>Visy's Standard SIR pulplug suppliers who are not FSC Certified shall participate in an annual audit of their HCV identification and management systems.</p> <p>This audit shall review the results of any third party audits regarding HCV 6. This audit is typically conducted at both a planning and management level. Additionally, in-field audits will also be conducted to review application at an operational level.</p> <p>Visy will engage with interested and affected stakeholders annually on the effectiveness of control measures and identification of undocumented HCVs.</p> <p>Visy undertakes the supplier assessments and monitoring as mentioned above (HVC 6), with specific review of the following Best Available Information for HCV 6.1*:</p> <ol style="list-style-type: none"> <li>Evidence that aesthetic values are consider as part of the planning process.</li> <li>Values are included in map layers where identified and included in the THP.</li> <li>Evidence of engagement on values.</li> </ol> <p>* reviewed during the audit process</p>	Low

Table 3 – Risk mitigation process (origin) for standard and low SIR pulplug operations – *Continued*

Controlled Wood Category	Existing Control Measures	Risk Score	Visy's Existing Control Measures	Revised Risk Score
CW Category 3.6 HCV 6.2 – Historic values of global or national cultural or archaeological significance.	<p>See mandatory and recommended actions above from the HCV Evaluation Framework (v1-1).</p> <p>A public state registry is available for landowners and management to identify sites of cultural and archaeological significance.</p> <p>For Vic: <a href="#">Aboriginal Cultural Heritage Register and Information System (ACHRIS)</a></p> <p>For NSW: <a href="#">Aboriginal Heritage Information Management System (AHIMS)</a></p> <p>For South Australia: <a href="#">Taa Wika Register of Aboriginal Sites and Objects, part of the Central Archive</a></p> <p>Australian National Heritage List outlines existing areas of natural significance including UNESCO sites and national parks.</p>	Specified	<p>Visy conducts a supplier approval process for all new pulplug suppliers.</p> <p>Visy's Standard SIR pulplug suppliers who are not FSC Certified shall participate in an annual audit of their HCV identification and management systems, including confirmation that 'best available information' is used in the assessment process</p> <p>This audit shall review the results of any third party audits regarding HCV 6. This audit is typically conducted at both a planning and management level. Additionally, in-field audits will also be conducted to review application at an operational level.</p> <p>For Low SIR suppliers, Visy will conduct annual in field audits based on a sampling regime, geographic location and risk.</p> <p>Visy will engage with interested and affected stakeholders annually on the effectiveness of control measures unless a risk to significant changes between scheduled annual engagements arise, in which case the engagement will occur as soon as possible after such change occurs.</p> <p>Standard SIR pulplug suppliers conduct regular operational monitoring. Management prescriptions as stated in the harvest plan are reviewed for compliance and adequacy by the supplier. This process will be reviewed during the annual audit.</p> <p>Thinning operations managed by Visy contracted harvest crews will be reviewed by Visy's dedicated forester for compliance to harvest and haulage codes of practice and adherence to any specified prescriptions detailed in the THP.</p> <p>HCV training is provided to Visy personnel and key suppliers to Visy including harvest crew operators, foresters and planners.</p>	Low

Controlled Wood Category	Existing Control Measures	Risk Score	Visy's Existing Control Measures	Revised Risk Score
CW Category 3.6 HCV 6.3 – Long term research sites	<p>See mandatory and recommended actions above from the HCV Evaluation Framework (v1-1).</p> <p>FCNSW, Visy's largest pulplug supplier has, for more than 35 years, had an Aboriginal Partnerships team. The team has worked closely with local aboriginal peoples and Local Aboriginal Land Councils (LALC) to conduct extensive land investigations for inclusion as an 'Aboriginal Place' under the National Parks and Wildlife Act (1974). <a href="#">See further information here.</a></p> <p>Other suppliers have sound existing relationships with LALC's and liaise regularly.</p> <p>Section 10A of the <i>Plantations and Reafforestation (Code) Regulation</i> requires cultural sites to be identified for Authorised Plantations. Additionally, the <i>Forest Practices Code (2005)</i> section 13.2 provides guidance for operators.</p>	Specified	<p>Visy's Standard SIR pulplug suppliers shall participate in an annual audit of their HCV identification and management systems.</p> <p>This audit shall review the results of any third party audits regarding HCV 6. This audit is typically conducted at both a planning and management level. Additionally, in-field audits will also be conducted to review application at an operational level.</p> <p>Visy will engage with interested and affected stakeholders, including LALC's annually on the effectiveness of control measures and identification of undocumented HCVs.</p> <p>Visy undertakes the supplier assessments and monitoring as mentioned above (HVC 6), with specific review of the following Best Available Information for HCV 6.3*:</p> <ol style="list-style-type: none"> <li>1. Identification and management of sites where long-term research is being conducted</li> <li>2. Evidence that there is timely and meaningful engagement with local aboriginal and other relevant cultural groups</li> </ol> <p>* reviewed during the audit process</p>	Low

Table 3 – Risk mitigation process (origin) for standard and low SIR pulplog operations – *Continued*

Controlled Wood Category	Existing Control Measures	Risk Score	Visy's Existing Control Measures	Revised Risk Score	Controlled Wood Category	Existing Control Measures	Risk Score	Visy's Existing Control Measures	Revised Risk Score
CW Category 3.6 HCV 6.4 – Social, including economic values (Not required for Low SIR)	<p>See mandatory and recommended actions above from the HCV Evaluation Framework (v1-1).</p> <p>The NSW Department of Industry, Lands and Forestry Division in conjunction with Forest &amp; Wood Products Australia, and the University of Canberra completed a study in 2017 of the Socio-economic impacts of the softwood plantation industry in the South West Slopes and Bombala region, NSW.</p> <p><a href="#">This publication can be accessed here.</a></p> <p>The Forest &amp; Wood Products Australia, in conjunction with The University of Canberra completed a similar study of the Socio-economic impacts of the plantation industry in the Green Triangle (South Australia).</p> <p><a href="#">This publication can be accessed here.</a></p> <p>The Forest &amp; Wood Products Australia, in conjunction with The University of Canberra also completed a similar study of the Socio-economic impacts of the plantation industry in Victoria (exc the Green Triangle).</p> <p><a href="#">This publication can be accessed here.</a></p>	Specified	<p>Visy's Standard SIR pulplog suppliers who are not FSC Certified shall participate in an annual audit of their HCV identification and management systems.</p> <p>This audit shall review the results of any third party audits regarding HCV 6. This audit is typically conducted at both planning and management levels.</p> <p>Visy will engage with interested and affected stakeholders annually on the effectiveness of control measures and identification of undocumented HCVs.</p> <p>Visy undertakes the supplier assessments and monitoring as mentioned above (HVC 6), with specific review of the following best available information for HCV 6.4*:</p> <ol style="list-style-type: none"> <li>1. Policies and procedures related to discrimination and diversity</li> <li>2. Evidence that there is timely and meaningful engagement with local aboriginal and other relevant cultural groups</li> </ol> <p>* reviewed during the audit process</p>	Low	CW Category 3.6 HCV 6.5 – Spiritual and cultural values	<p>See mandatory and recommended actions above from the HCV Evaluation Framework (v1-1).</p> <p>FCNSW, Visy's largest pulplog supplier has, for more than 35 years, had an Aboriginal Partnerships team. The team has worked closely with local aboriginal peoples and Local Aboriginal Land Councils (LALC) to conduct extensive land investigations for inclusion as an 'Aboriginal Place' under the National Parks and Wildlife Act (1974). <a href="#">See further information here.</a></p> <p>Other suppliers have sound existing relationships with LALC's and liaise regularly.</p> <p>A public state registry is available for landowners and management to identify sites of cultural significance.</p> <p>For Vic: <a href="#">Aboriginal Cultural Heritage Register and Information System (ACHRIS)</a></p> <p>For NSW: <a href="#">Aboriginal Heritage Information Management System (AHIMS)</a></p> <p>For South Australia: <a href="#">Taa Wika Register of Aboriginal Sites and Objects, part of the Central Archive</a></p>	Specified	<p>Visy conducts a supplier approval process for all new pulplog suppliers.</p> <p>Visy's Standard SIR pulplog suppliers who are not FSC Certified shall participate in an annual audit of their HCV identification and management systems, including confirmation that 'best available information' is used in the assessment process.</p> <p>This audit shall review the results of any third-party audits regarding HCV 6. This audit is typically conducted at both a planning and management level. Additionally, in-field audits will also be conducted to review application at an operational level.</p> <p>For Low SIR suppliers, Visy will conduct annual in field audits based on a sampling regime, geographic location and risk.</p> <p>Visy will engage with interested and affected stakeholders annually on the effectiveness of control measures unless a risk to significant changes between scheduled annual engagements arise, in which case the engagement will occur as soon as possible after such change occurs.</p> <p>Standard SIR pulplog suppliers conduct regular operational monitoring. Management prescriptions as stated in the harvest plan are reviewed for compliance and adequacy by the supplier.</p> <p>This process will be reviewed during the annual audit.</p> <p>Thinning operations managed by Visy contracted harvest crews will be reviewed by Visy's dedicated forester for compliance to harvest and haulage codes of practice and adherence to any specified prescriptions detailed in the THP.</p> <p>HCV training is provided to Visy personnel and key suppliers to Visy including harvest crew operators, foresters and planners.</p>	Low

Table 4 – Risk mitigation for wood from conversion sources

Controlled Wood Category	Existing Control Measures	Risk Score	Visy's Existing Control Measures	Revised Risk Score
CW Category 4.1 Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses	Existing legislative frameworks exist within NSW, ACT, Victoria and South Australia which aims to discourage through legislative vehicle, the clearing of native land for other use.  These include the <i>Environmental Protection and Assessment Act (1979)</i> , <i>Plantations and Reafforestation Act 1999 (NSW)</i> , <i>Planning and Environment Act (1987)</i> and the <i>Native Vegetation Act 1991 (SA)</i> and the <i>ACT Nature Conservation Act 2014 (ACT)</i> .	Specified	All of Visy's wood fibre resources for the production of kraft liner are sourced from softwood plantations in the combined NSW, ACT, Victoria and South Australia regions. Visy's Tumut mill is configured to only pulp exotic Pinus species.  Chip quality is continuously monitored to ensure it meets Visy's softwood specifications.  Visy conducts a supplier approval process for all pulplog suppliers.	Low

Table 5 – Desired outcomes for control measures

Control Measures	Desired Outcomes
Visy conducts a supplier approval process for all pulplog suppliers.	Visy's fibre sourcing team conducts a supplier approval process to ensure that all suppliers have sufficient management systems in place. These management systems shall comprehensively meet the requirements for identification, assessment and protection of HCVs.  Organisational policies, procedures and capabilities will also be reviewed by Visy prior to acceptance of the supplier.  Visy's qualified forest team will work with suppliers who do not meet our minimum requirements to ensure HCVs are being managed effectively and provide ongoing support and assessment as required.
Visy's Standard SIR pulplog suppliers who are not FSC Certified shall participate in an annual audit of their HCV identification and management systems, including confirmation that 'best available information' is used in the assessment process	Visy will review and confirm that Standard SIR pulplog suppliers who do not have current FSC FM Certification have comprehensive management systems in place to identify and appropriately manage the presence of HCVs in all plantations, harvest, and roading areas. Procedures shall be reviewed on the effectiveness of identifying HCVs and recording this on THPs, datasets and GIS layers.  Adherence to Environmental Management plans will also be reviewed. An audit tool has been established to identify key performance indicators.
This audit shall review the results of any third party audits regarding HCVs. This audit is typically conducted at both planning and management levels.	The supplier will be required to demonstrate that designated staff are competent in searching and assessing the data related to HCVs while field staff are trained in the identification and management of HCVs. Staff will be required to demonstrate a thorough understanding of HCVs during the audit process.
Additionally, in-field audits will also be conducted to review application at an operational level.	The process for completing THPs and applying prescriptions (where applicable) will be reviewed for effectiveness. Part of this assessment will be completed in field.  The process for identifying, engaging and managing stakeholder feedback will be reviewed for effectiveness.  The audit aims to ensure HCVs are appropriately identified and managed by the Standard SIR pulplog supplier and that these processes are reflected on the ground.

Table 5 – Desired outcomes for control measures – continued

Control Measures	Desired Outcomes
For Low SIR suppliers, Visy will conduct annual in field audits based on a sampling regime, geographic location and risk.	Low SIR suppliers will be part of an annual sampling regime to test the effectiveness of planning processes, and adherence to prescriptions and contractor competency.  The review will be conducted using a thorough audit tool and will be conducted both on site and at a management level. Sources of data will be reviewed and evidence from the site will be taken.  The audit aims to ensure HCVs are appropriately managed for the Scale, Risk and Intensity of the operations and of the supply into Visy. Audits will generally be conducted shortly after the commencement of operations.
Visy will engage with interested and affected stakeholders annually on the effectiveness of control measures unless a risk to significant changes between scheduled annual engagements arise, in which case the engagement will occur as soon as possible after such change occurs.	Interested and affected stakeholders will be given the opportunity to review Visy's assessment of the risk and proposed mitigation plan. Additionally, Visy will seek to obtain additional information on the presence and management of HCVs. Stakeholders will be contacted annually unless there are changes to risk.  Feedback will be considered and where practicable, comments taken into consideration in the preparation of harvest plans and risk designation for the relevant HCV. Visy shall work with the stakeholders to implement effective control measures based on fluid communication towards a desired outcome for both parties.  In addition to Visy's stakeholder engagement, Visy will review the effectiveness of its supplier's stakeholder engagement processes during the annual desktop audit.
Pulplog suppliers conduct regular operational monitoring. Management prescriptions as stated in the THP are reviewed for compliance and adequacy by the supplier. This process will be reviewed during the annual audit.	Pulplog suppliers have a regular internal monitoring process of current operations. These visits aim to review the activities of operators including adherence to the prescriptions outlined in the THP and Site Safety Plan (SSP). In some instances these are conducted as third party audits for impartiality.  The frequency and content of these internal audits will be reviewed by Visy during the annual systems audit. This will also include the process for identifying, recording and rectifying any non-conformances.  Consistent compliance with the THP and Site Safety Plan demonstrates a strong system of conformance.
Thinning operations managed by Visy contracted harvest crews will be reviewed by Visy's dedicated forester for compliance to harvest and haulage codes of practice and adherence to any specified prescriptions detailed in the THP.	Visy dedicated and qualified foresters have access to completed THP and Site Safety Management Plans for all suppliers. Review of the prescription of these plans are conducted along with continual and documented monitoring of the operations.  This monitoring aims to ensure continual monitoring is being conducted on Visy contractors conducting thinning operations.
HCV training is provided to Visy personnel and key suppliers to Visy including operators, foresters and planners.	Training on HCVs is provided to Visy personnel and key suppliers as required. This aims to ensure knowledge is up to date and HCV identification and management is consistent among all suppliers to Visy and in line with the Controlled Wood standards and HCV Evaluation Framework.
All of Visy's wood fibre resources for the production of kraft liner are sourced from softwood plantations in the combined NSW, Victoria, South Australia and ACT regions.  Visy's Tumut mill only has the capacity to pulp exotic Pinus species. The mill is incapable of pulping timber species that are native to NSW, Victoria, South Australia and ACT.	Operationally, Visy's Tumut facility is configured to process wood fibre from only Pinus species. Chip quality is measured continuously at the mill for consistency. A change to species would cause considerable interruptions to the mill production and quality.

# Stakeholder engagement

Visy received no feedback during the 2022-2023 Stakeholder Engagement process on the presence or management of HCVs within the supply area or regarding concerns relating to management activities of Visy's suppliers.

Visy has developed an extensive stakeholder list including non-government organisations (NGOs), representatives of social and employment groups, government agencies, forest management units, recreational forest uses, local harvest operators, experts (including ecologists) and local indigenous representatives. These stakeholders are selected based on their interest and involvement in the harvesting and plantation management activities and their geographical location relevant to the sourcing areas (Refer to the areas listed on page 8).

Affected stakeholders are engaged and consulted by Visy annually on the control measures contained in this document. Where Visy does not have access to stakeholder information due to privacy reasons, a public notification process will be used and documented. Local Councils have been engaged to assist Visy to access regional stakeholders including access to council social media channels and websites.

All documents required for Visy's 2023 consultation will be made available on the FSC Australia Website (Other Consultations page) during this period. Maps outlining Visy's supply areas will be made available upon request. Stakeholders will be provided a minimum of 6 weeks' notice to provide comment prior to Visy's external assessment of the effectiveness of its risk assessment and control measures (this document).

Visy has established a Stakeholder Registration Page for interested and affected stakeholders. Stakeholders can register their interest and receive public documentation on Visy's softwood supply. This enables distribution of important information regarding Visy's fibre sourcing origin, and supply chain changes as well as create a stakeholder database for those who wish to receive any ongoing information. [To register, please select this link.](#)

In addition, Visy's suppliers will contact affected stakeholders prior to any management activity such as Harvesting, Spraying and Roding. Affected stakeholders are generally taken to include neighbouring property owners, road uses (private and council), recreational forest uses and aboriginal groups.

Where complaints are received and/or issues are identified, these will be considered and investigated by Visy and actioned as appropriate. Visy will acknowledge receipt of the complaint and will work with the complainant to resolve substantiated concerns. All issues raised are documented and records kept. The stakeholder will be provided with a written explanation of the actions taken to rectify any concerns where substantiated.



# Supply chain risks and control measures

## Summary of the supply chain

Standard and Low SIR pulplog suppliers are supplying whole logs direct to Visy from the plantation source. There is no processing of the product prior to arrival on the Visy site, nor are there any identified complexities in the supply chain, such as warehousing.

All pulplog suppliers to Visy must have a current, approved supply agreement. Agreements are based on the term, area of supply, harvesting and haulage arrangements and quantity (green metric tonnes).

Each load of fibre delivered to site has a delivery docket, either electronic or paper, with specific details including the supplier name, date of delivery, harvest contractor, haulage contractor, area of supply, forest supply coupe, tonnage, species and other relevant information. Delivery docket and log supply data is maintained in Visy's Weighbridge system. *(See also VPP1206-09 Visy Pulp and Paper DDS – Process Summary for further information on this process).*

In addition to information received on suppliers through establishment of the agreement and through sighted documentation, additional on-site visits are conducted regularly by a Visy-appointed Forester.

See risk assessment details above for origin.

## Sampling approach – in-field audits

The current Controlled Wood standard FSC-STD-40-005 v3-1 does not provide guidance on sampling for field verification audits. As such, Visy will sample at least 75% of all suppliers to Visy using in-field verification techniques.

The sample frequency is based number of Low SIR pulplog suppliers in the last calendar year (4). In order to meet the requirement of *FSC STD 40-005* only active or recently active harvesting sites are audited.<sup>1</sup>

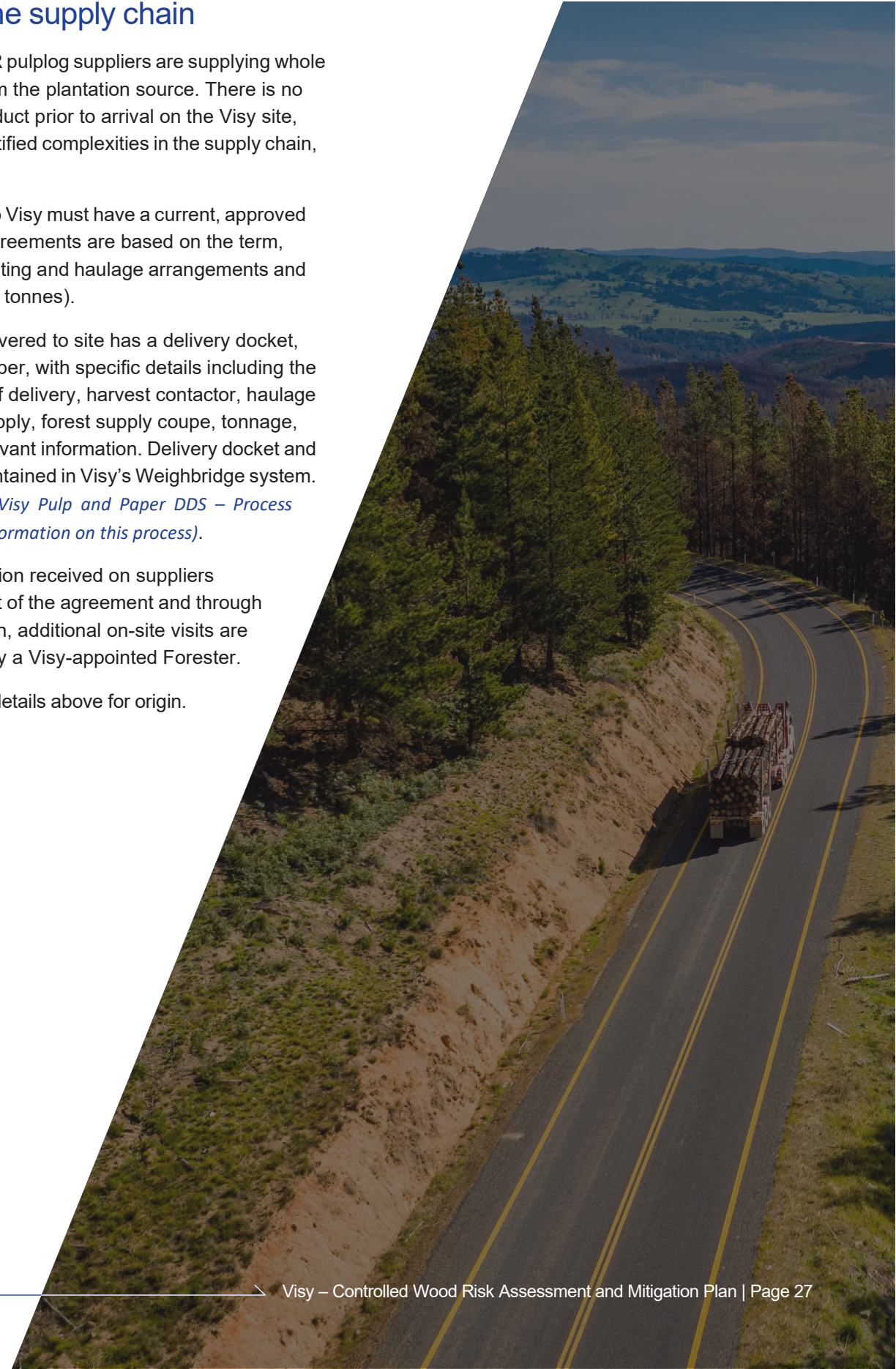
*The minimum audit sample number for 2032-2024 is 3.*

Visy's Certification Body will review the process for sample selection during the annual surveillance audit. Visy will take into consideration supplier, size of the operation, and geographic location to ensure the sample process is representative.

## Auditor competency

Visy personnel conducting field verification audits have had appropriate training, to ensure sufficient understanding of the FSC Australia HCV framework. Training records are kept for a minimum 5 years. Visy's auditor for the purposes of conducting field verification is also required to be qualified as a Lead Auditor – Quality Management Systems/Safety or Environment.

<sup>1</sup> 1.10. Verification audits should be conducted timely after receipt of the wood.



# Pulplog supply chain control measures

Table 6 – Risk mitigation process (supply chain) for large pulplog suppliers

Risk	Risk Defined	Existing Control Measures	Risk Score
Risk of mixing within the supply chain.	<p>Risk that wood may be distributed to a central location prior to arriving at the mill.</p> <p>Risk that wood may be sourced from multiple sources therefore creating a mixed load.</p>	<p>Each supply compartment is registered in the weighbridge system by the Fibre and Forestry Manager, including; supplier details, haulage company, location, compartment number and property name, species, age class and specified haulage route (if applicable).</p> <p>For electronic docketing, a load identifier code (ID) is defined by the region, haulage rates and the species type. Weighbridge queries are completed with the supplier's database and docket information is populated automatically into Visy's weighbridge system.</p> <p>Each supply arrangement as stated above will have a unique ID. Deliveries cannot be accepted without the specified ID being correctly entered and the registered haulage vehicle being nominated against the correct haulage company.</p> <p>Delivery dockets accompany all deliveries, unless via electronic docketing.</p> <p>Delivery documentation and load reviews are conducted as part of Visy's internal FSC audit process. Evidence is gathered on supply dockets and reconciliation of data.</p> <p><i>(See also VPP1206-09 Visy Pulp and Paper DDS – Process Summary for further information on this process)</i></p>	Low
Risk that wood is not from the specified area of origin.	<p>Origin has not been assessed prior to the arrival at the mill.</p> <p>Pulplog origin has not been assessed against the Controlled Wood criteria (FSC-STD-40-005).</p>	<p>Each supply compartment is registered in the weighbridge system by the Fibre and Forestry Manager, including; supplier details, haulage company, location, compartment number and property name, species, age class and specified haulage route (if applicable).</p> <p>Supply agreements specify the area of sourcing for all pulplogs. Pricing and haulage information is determined prior to any agreement being signed.</p> <p><i>(See also VPP1206-09 Visy Pulp and Paper DDS – Process Summary for further information on this process)</i></p>	Low

# Sawmill chip supply chain control measures

Table 7 – Risk mitigation process (supply chain) for sawmill chip suppliers

Risk	Existing Control Measures	Revised Risk Score
Risk of mixing within the supply chain.	<p>An annual on-site review is conducted by the Visy Representative to determine the effectiveness of systems implemented to reduce the risk of mixing at the Sawmill Chip supplying site.</p> <p>In addition, all Sawmill suppliers have a signed declaration requiring notification to Visy in the event of changes to factors that may affect Visy's current assessment of risk. Where a new supplier is sought by the Sawmills, Visy will conduct its own assessment of the supply using existing audit tools. Suppliers will be required to meet Visy's minimum requirements. Visy will work with all sub-suppliers to ensure HCVs are appropriately identified and managed before logs arrive at the Sawmill.</p> <p>Delivery dockets accompany all deliveries to the Sawmill Suppliers. All suppliers to the Sawmills generally also supply direct into Visy in the form of pulplogs.</p>	Low
Risk that Fibre is not from the specified area of origin.	<p>An annual on-site review is conducted by the Visy Representative to determine the effectiveness of systems implemented to reduce the risk of mixing at the Sawmill Chip supplying site.</p> <p>Delivery dockets accompany all deliveries to the Sawmill suppliers. All suppliers to the Sawmills generally also supply direct into Visy in the form of pulplogs.</p> <p>In addition, all Sawmill suppliers have a signed declaration requiring notification to Visy in the event of changes to factors that may affect Visy's current assessment of risk. Where a new supplier is sought by the Sawmills, Visy will conduct its own assessment of the supply using existing audit tools. Suppliers will be required to meet Visy's minimum requirements. Visy will work with all sub-suppliers to ensure HCVs are appropriately identified and managed before logs arrive at the Sawmill.</p>	Low

Visy has determined that there is a 'Low' risk of mixing throughout the supply chain for all suppliers. The prescribed control measures will be implemented by Visy.

Sawmill (chip) suppliers supply softwood chips to the Tumut site. Each load of chips delivered has an accompanying delivery docket, either electronic or paper, with specific details including the sawmill supplier, date of delivery, product delivered and quantity (net weight in green metric tonnes). Visy shall perform regular checks of the Sawmill suppliers' lists to ensure that these are consistent with those suppliers direct to Visy.

An annual on-site audit shall be conducted to review the information supplied and obtain evidence of compliance.

In addition to the above, Visy Tumut receives chip from its operational facility based in Albury, NSW. This Visy facility is receiving pulplogs from existing suppliers and supply regions as identified throughout this document.

The pulplogs are chipped on site, stored, and at an appropriate time, delivered to the Tumut site. The Visy Albury site is audited annually and the site's fibre management is overseen by the Tumut fibre team, supported by the Program Manager – Fibre Stewardship.

# Visy complaints process



Visy is committed to ensuring its supply of controlled wood meets all the requirements of the standard *FSC-STD-40-005 Requirements for Sourcing FSC Controlled Wood*. Visy has a comprehensive internal procedure for managing complaints regarding the legitimacy of its wood fibre supply.

Visy may receive complaints regarding the supply of Controlled Material to Visy from its suppliers or sub-suppliers. These may be in relation to fibre origin or aspects of the supply chain.

Visy's complaints process will operate as follows:

- Complaints must be received in writing and should be supported by evidence in order to allow Visy to substantiate the complaint.
- Once a complaint is received, in the correct format, Visy must acknowledge receipt of the complaint as soon as practicable and advise the complainant of the complaints process and the name of the Visy representative who shall be responsible for providing a response.
- Where the complaint is made in relation to a Controlled Wood category with a risk designated at 'low' (as per a NRA), the complaint shall be forwarded to the relevant FSC regional office and Certifying Body.

- Where the complaint is made against a Controlled Wood category that is classified as 'Specified Risk' or the complainant has concerns regarding the adequacy of the control measures the following shall apply:
  - The Visy Representative shall review the evidence supplied by the complainant and review whether this is applicable to the relevant CW category (as mentioned above) and whether it deems the supply 'unacceptable'.
  - Visy will discuss the complaint and suggested outcomes with the complainant to ensure a solution can be agreed.
  - Visy will notify the Certifying Body and FSC Australia of the substantiated complaint within 2 weeks of receiving the complaint.
  - Visy will initiate its Non-Conforming Wood Fibre Inputs process.
- Investigations shall be targeted to be completed within two weeks after receipt of the complaint, including an assessment of the evidence.

## Revisions

Revision	Date of Revision	Prepared By	Approved By:
Issue 1	January 2017	Carlie Porteous (FSC/PEFC Administrator)	Dean Hawkins (Fibre and Forestry Manager) Jean Nouaze (GM – Visy Pulp and Paper)
Issue 2	December 2017	Carlie Porteous (FSC/PEFC Administrator)	Dean Hawkins (Fibre and Forestry Manager) Christopher McComb (GM – Visy Pulp and Paper) Bill Hurditch (The Fifth Estate)
Issue 3	January 2019	Carlie Porteous (Manager – Forestry and Fibre Compliance)	Dean Hawkins (Fibre and Forestry Manager) Bill Hurditch (The Fifth Estate) Jean Nouaze (Executive GM – Pulp and Paper)
Issue 4	March 2020	Carlie Porteous (Manager – Forestry and Fibre Compliance)	Dean Hawkins (GM – Fibre Resources) Campbell Sanderson (Manager – Forestry and Fibre) Bill Hurditch (The Fifth Estate)
Issue 5	February 2021	Carlie Porteous (Manager – Forestry and Fibre Compliance)	Dean Hawkins (GM – Fibre Resources) Bill Hurditch (The Fifth Estate)
Issue 6	October 2022	Rebecca Jones (Program Manager – Fibre Stewardship)	Dean Hawkins (GM – Fibre Resources)
Issue 7	July 2023	Rebecca Jones (Program Manager – Fibre Stewardship)	Dean Hawkins (GM – Fibre Resources) Dallas Goldspink (Fibre & Forestry Manager)

## Contact information

If you have any concerns or questions regarding this summary of Visy's Due Diligence System, please contact Visy's Representative on the details below:

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