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		Approved by:	Gerrit Marais

CONTROLLED WOOD RISK ASSESSMENT REPORT

INTRODUCTION

This document must be used with the RD 15-01 - Guideline - Approach and criteria for assessing risk when uncertified controlled wood is used in FSC certified products and FSC-ADV-40-016 V2 - Implementation of FSC Controlled Wood requirements in FSC STD-40-005 V2-1 and FSC-STD-20-011 V1-1.

This template is a guideline to do the risk assessment and must not be seen to include all information. Any other sources of information may be added to ensure that all detail was analysed.

This assessment must be done on origin of uncertified wood that will be used in FSC products as controlled wood.

If it is determined that the material is classified as being from a source that is classified as unspecified risk, the requirements of the RD16 – Guideline – Requirements for company verification program must be followed. This will be audited annually.

Note: This document details all the elements that are required to do the risk assessment. However, the document is divided into a “Restricted Information” section and a “Public Information” section. Only the information recorded in the “Public” section will be available on the FSC website. The information in the “Restricted” section will be covered by the SGS rules of confidentiality and will not be disclosed.

The Risk Assessment requires a precautionary approach. Any area worldwide is therefore considered “unspecified risk” until “low risk” can be determined in line with the risk assessment set out hereunder (refer Section 1.1 of FSC-STD-40-005)

The following is important:

1. The Risk Assessment shall begin at the broadest relevant scale. If conditions at a given scale are not sufficiently homogeneous to establish low risk, the scale shall be further decreased. The Risk Assessment shall be continued at decreasing scales until conditions are sufficiently homogeneous.
2. Risk designation may be possible at a national level under certain homogenous conditions, whereas under more heterogeneous conditions, risk designation may only be possible at a district or local level and/or at the level of subsets of eco-regions.
3. If more than one supplier is from the same low risk country only one risk assessment need to be completed for the specific country.
4. Companies are expected to review their risk assessments at least once per year to verify the continued correctness of their risk designations for each indicator of the five FSC Controlled Wood categories. This should be conducted before the annual surveillance by the certification body in which the certification body is expected to verify the revision process. When significant changes to the risk profile become evident (i.e. changes in the law, breakdown in rule of law through civil unrest, etc) the company shall review its risk assessment
5. The document must be completed in one of the two official language of FSC (English or Spanish).

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RESTRICTED INFORMATION

1. COMPANY DETAIL

Company name		York Timbers (Pty)Ltd
Project number:		12744-ZA
Certificate number:		SGS-COC-008395
Controlled wood Certificate number		SGS-CW-008395
Country:		South Africa
Company address		Physical Address: 1 Milkwood St, Sabie 1260
Contact detail:	Contact person:	Dave Malloch-Brown
	Telephone:	+27 82 805 6966
	Fax:	
	e-mail Address	dmallochbrown@york.co.za
Assessment done by:		D. Malloch-Brown
Relation to the company:		Environmental Officer
Date:		7 th October 2015
Signature		<i>Dave Malloch-Brown</i>

2. APPROVAL BY SGS

SGS auditor:	Felicity Henman-Weir
Comments:	Approved
Date:	13 November 2015

3. SUPPLIER'S DETAIL

Company Name:	Misty Mountain
Country:	South Africa
District:	Long Tom Pass, Sabie area, Mpumalanga.
Company Name:	Breytenbachskraal
Country:	South Africa
District:	Robber's Pass, Pilgrims Rest area, Mpumalanga
Company Name:	Erasmushoop plantation
Country:	South Africa

District:	Bourke's Luck, Mpumalanga
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Note: if more than one supplier is used please copy the table above for each supplier

Note: separate risk assessments must be done and a separate report prepared for different countries.

4. LIST OF DISTRICTS OF ORIGIN

List the districts of origin of timber supplied within the company's FSC Controlled Wood Program.

Product	Species	District
Pine logs	Pinus taeda - Loblolly Pine Pinus elliottii - Slash Pine Pinus patula - Mexican Pine	Mpumalanga province

5. SUPPLY CHAIN

Manufacturers or traders that wish to control their timber sources within their own verification program shall demonstrate to the satisfaction of their certification body that its supply chain is identifiable and traceable down to the district (forest) level.

Company	Process	Input and origin	Controlled system verified
Misty Mountain	Timber grower. Sale of round logs.	Round logs in the province of Mpumalanga South Africa.	Supply agreement with the timber grower to supply timber directly from the FMU to the York mill. No other handling of the timber. The supplier is a legally registered company in South Africa. York Timber employees visit the site of the trees and only approved harvesting contractors that meet York Timbers H & S standards and best operating practices are used.
Breytenbachskraal	Timber grower. Sale of round logs.	Round logs in the province of Mpumalanga South Africa.	
Erasmushoop Plantation	Timber grower. Sale of round logs.	Round logs in the province of Mpumalanga South Africa.	

FSC CONTROLLED WOOD RISK ASSESSMENT

PUBLIC INFORMATION

A COMPANY DETAIL

Company name	York Timbers (Pty) Ltd
Project number:	12744-ZA
Certificate number:	SGS-COC-008395
Controlled wood Certificate number	SGS-CW-008395
Country:	South Africa

B APPROVAL

Approving Certification Body:	SGS South Africa (Pty) Ltd - Qualifor Programme PO Box 82582 Southdale South Africa 2135 E-mail Address: Forestry@sgs.com
Date of Risk Assessment	7 th October 2015
Comments:	Approved
Date Approved:	13 November 2015

C ORIGIN OF TIMBER

Country:	South Africa		
District	Mpumalanga		
Risk Assessment Level (indicate the risk for the different levels)	Country	District	FMU
	Unspecified Risk	Low Risk	Low Risk

D RESULT OF RISK ASSESSMENT

Type of source e.g. natural forest or plantations and general description of the supplier	The timber suppliers all have commercial exotic plantation forestry operations and all are legally registered companies.
Results (Low or Unspecified Risk and motivation:	Although the country is unspecified risk, the district of Mpumalanga and the FMU are low risk.

SPECIFIC REQUIREMENTS FOR EACH FSC CONTROLLED WOOD CATEGORY

1. ILLEGALLY HARVESTED WOOD

1.1 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:

NOTE: FSC-STD-40-005 V2-1 requires a precautionary approach by companies when assessing risk. This means that if there is lack of information on corruption for the forestry sector, a country/district shall be defined as 'unspecified' risk for the referenced indicator and therefore for the whole Controlled Wood category

Requirements	Examples of sources of information	Finding & Evidence (FSC-ADV-40-016 v2 - Sources of information used to assess the indicators must be listed)	Result	
			Unspecified risk	Low
1.1.1 Evidence of enforcement of logging related laws in the district	<p>FSC National Initiatives (contacts from www.fsc.org); http://www.Transparency.org</p> <p>The Royal Institute of International Affairs (www.illegal-logging.org);</p> <p>Environmental Investigation Agency (www.eia-international.org);</p> <p>Global Witness: (www.globalwitness.org);</p> <p>Telapak (for Indonesia - www.telapak.org);</p>	<p>No illegal logging takes place within York's supply chain. York buys the timber directly from the legal owner of the property. York undertakes the harvesting and transport of the logs on the supply FMU. The logs are transported direct from the FMU to the relevant York sawmill. Since York has good control over the harvesting and transport, there is no danger of this timber getting mixed with illegally harvested logs.</p>	Low Risk	
1.1.2 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>UK Government's Department for International Development (DFID)</p> <p>EU FLEGT process: http://ec.europa.eu/comm/development/body/the_me/forest/initiative/index_en.htm</p> <p>Transparency international index (www.transparency.org) Corruption perceptions</p> <p>WWF (www.panda.org);</p> <p>ELDIS (www.eldis.org) regional and country profiles www.cites.org</p> <p>NGOs and involved stakeholders</p>	<p>York has a robust framework is in place to control any outside purchases. Purchase agreements are in place prior for any log supply and all suppliers either have planting permits for plantations that were planted before 1972, or Water Use licences for plantations established after that. York mills follow a COC system that identifies sources of timber.</p> <p>Water licenses replaced the planting permit as a result of the National Water Act 1988. The process is delayed in that the organisations water usage is registered and invoiced by the Department even</p>	Low Risk	

		though licenses have not yet been issued. Furthermore dedicated York staff is appointed in the Logistics dept. who deal with the controlled wood sources and the logistical flow of timber from our sources.	
1.1.3	There is little or no evidence or reporting of illegal harvesting in the district of origin.	York Forestry only purchases timber from the legal landowners/growers and not from 3rd party timber traders.	Low Risk
1.1.4	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	Although the Transparency International CPI for South Africa is below 50, there is no evidence of corruption in our timber supplies. All trade in timber products into our plants and operations are conducted by company employees and not through third party timber traders. All purchases are made from private growers/landowners who trade from registered companies and have all the necessary licenses and permits. Due to the systems in place, see 1.1.2 above, we determine the risk to be low.	Low Risk

2 WOOD HARVESTED IN VIOLATION OF TRADITIONAL OR CIVIL RIGHTS

2.1 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:

Requirements	Examples of sources of information	Finding & Evidence (FSC-ADV-40-016 v2 - Sources of information used to assess the indicators must be listed)	Result	
			Unspecified risk	Low
2.1.1 There is no UN Security Council ban on timber exports from the country concerned;	E.g. This has applied to Liberia, as of July 2003 (www.un.org/esa/africa/UNNews_Africa/timber.htm) Global Witness www.globalwitness.org	No timber is imported and S.A. timber from plantations is freely traded – no UN security Council ban on south Africa.	Low Risk	

<p>2.1.2 The country or district is not designated a source of conflict timber (E.g. USAID Type 1 conflict timber);</p>	<p>The final report of the expert panel on illegal exploitation of natural resources and other forms of wealth in Democratic Republic of Congo, 2002, Annexes I and III (S/2002/1146) www.naturalresources.org/minerals/CD/docs/other/N0262179.pdf</p> <p>Conflict Timber: Dimensions of the Problem in Asia and Africa. Volume I. Synthesis report. June 2003, available at: www.usaid.gov/hum_response/oti/pubs/vol1synth.pdf</p>	<p>All timber is sourced from South African plantations. The country is not designated a source of conflict timber.</p> <p>All land claims are handled according to the Restitution of Land Rights Act (22 of 1994) (RLRA).</p> <p>Any transaction over the land is done with the consent of the land administration committee managing the affairs of the communally held land - Communal Land Rights Act (11 of 2004</p>	<p>Low Risk</p>
<p>2.1.3 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</p>	<p>FSC National Initiatives and Regional Offices contacts www.fsc.org</p> <p>ILO country offices</p>	<p>S.A. has labour legislation in place and the Dept. of Labour carry out inspections from time to time – no evidence of child labour.</p> <p>Labour Relations Act (66 of 1995)</p> <p>The timber to be supplied by the FMU will be harvested and transported by York's own operations. All contractors must adhere to the organisation's H & S policy and BOP. No violations are known or have been reported against any of the suppliers listed in "2. Supplier Details" in the restricted information section above. Labour Law in South Africa is enforced by the Dept. of Labour. York only deals with registered legal companies throughout its business. Adherence to all applicable SA legislation forms part of the York contract agreement with contractors.</p>	<p>Low Risk</p>
<p>2.1.4 There are recognized and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the district concerned;</p>	<p>FSC National Initiatives and Regional Offices contacts www.fsc.org</p> <p>Indigenous Peoples Organizations</p> <p>Local community associations in the district</p> <p>Risk register</p> <p>National Sources (e.g. records of land claims negotiation concluded or in progress, summaries of court decisions)</p>	<p>All plantations occur on land that is owned – S.A. is going through a legal process of redistributing land and has a process and structures to deal with land claims legally.</p> <p>Restitution of Land Rights Act (22 of 1994) (RLRA).</p> <p>The suppliers are commercial timber plantations established by the owners.</p>	<p>Low Risk</p>

2.1.5 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.	FSC National Initiatives and Regional Offices contacts www.fsc.org ILO country offices	All plantations are legally owned. There are no indigenous peoples as described by the UN charter within the district concerned. There is no evidence of violation of tribal rights within the district concerned.	Low Risk
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3 WOOD HARVESTED FROM FOREST IN WHICH HIGH CONSERVATION VALUES ARE THREATENED BY MANAGEMENT ACTIVITIES

3.1 The district of origin may be considered low risk in relation to any 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

Requirements	Examples of sources of information	Finding & Evidence (FSC-ADV-40-016 v2 - Sources of information used to assess the indicators must be listed)	Result	
			Unspecified risk	Low
3.1.1 Forest management activities in the relevant level (eco-region, sub-eco-region, local) do not threaten eco-regionally significant high conservation values;	<p>FSC documentation on HCVPs: www.fsc.org</p> <p>Eco-region definition and information: http://www.worldwildlife.org/science/ecoregions.cfm</p> <p>Those regions identified by Conservation International as a Biodiversity Hotspot</p> <p>(or) Those ecosystems and communities that are explicitly identified by Conservation International as a key component of a <i>Biodiversity Hotspot</i></p> <p>Those forest, woodland, or mangrove eco-regions identified by World Wildlife Fund as a <i>Global 200 Eco-region</i> and assessed by WWF as having a conservation status of <i>endangered</i> or <i>critical</i>. If the Global 200 Eco-region comprises more than a single terrestrial eco-region, an eco-region within the Global 200 Eco-region can be considered low risk if the sub-eco-</p>	<p>All timber is sourced from plantations of exotic trees. Plantations were established through legal processes are registered and will in due course be licensed. Plantation establishment in S.A. is highly regulated and subject to strict and thorough impact assessments. There are no HCVP's in the region concerned.</p> <p>There is also strict environmental legislation in the S.A., as governed by NATIONAL ENVIRONMENTAL MANAGEMENT ACT (107 OF 1998).</p> <p>Areas of special historic, cultural or archaeological importance are protected through the NATIONAL HERITAGE AND RESOURCES ACT 25 OF 1999 (NHRA).</p>	Low Risk	

	<p>region is assessed with a Conservation Status other than “critical/endangered.”</p> <p>Those regions identified by the World Conservation Union (IUCN) as a <i>Centre of Plant Diversity</i></p> <p>Those regions identified by Conservation International as a <i>High Biodiversity Wilderness Area</i> that are forests and contain contiguous forest ecosystems greater than 500 km².</p> <p>Those regions identified by the World Resources Institute as a <i>Frontier Forest</i></p> <p>Intact Forests Landscapes, as identified by Greenpeace (www.intactforests.org)</p>		
3.1.2 A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the eco-region;	<p>FSC National Initiatives</p> <p>Signatory to the Convention on Biological Diversity https://www.biodiv.org/world/parties.asp and demonstrable progress towards completing a network of protected areas, such as an overall positive analysis of the latest country thematic report on Forest Ecosystems https://www.biodiv.org/reports/list.aspx?type=for</p>	<p>South Africa has a system of National, Provincial and local nature reserves. All developments including plantations are subject to full environmental impact assessments. There are no HCVF’s in the region concerned.</p> <p>There is also strict environmental legislation in South Africa, as governed by NATIONAL ENVIRONMENTAL MANAGEMENT ACT (107 OF 1998).</p>	Low Risk

4 WOOD HARVESTED FROM AREAS BEING CONVERTED FROM FORESTS AND OTHER WOODED ECOSYSTEMS TO PLANTATIONS OR NON-FOREST USES

- 4.1. 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:

[Note: the change from plantations to other land uses is not considered as conversion].

Requirements	Examples of sources of information	Finding & Evidence (FSC-ADV-40-016 v2 - Sources of information used to assess the indicators must be listed)	Result	
			Unspecified risk	Low

<p>4.1.1 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</p>	<p>FAO GOFC-GOLD Global Observation of Forest and Land Cover Dynamics</p> <p>FAO Global Forest Resources Assessment</p> <p>Conservation International Regional Analysis Program</p> <p>University of Maryland Department of Geography</p> <p>UNEP/GRID – Division of Early Warning and Assessment</p> <p>SERVIR – Regional Monitoring and Visualization System for Mesoamerica</p> <p>Congo Basin Forest Partnership and CARPE</p> <p>CEC Joint Research Centre</p> <p>INPE-PRODES – Brazil’s National Institute for Space Research</p> <p>Hansen, M., DeFries, R., Townshend, J.R., Carroll, M., Dimiceli, C., Sohlberg, R. 2003. 500 m MODIS Vegetation Continuous Fields. College Park, Maryland: The Global Land Cover Facility.</p> <p>National data sources</p> <p>FSC National Initiatives and Regional Offices contacts www.fsc.org</p>	<p>All timber is from eucalyptus and pine plantations – there is thus no impact on indigenous forests when these plantations are harvested.</p>	<p>Low Risk</p>
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5 WOOD FROM FORESTS IN WHICH GENETICALLY MODIFIED TREES ARE PLANTED

5.1 Requirements related to wood from forests in which genetically modified trees are planted

Requirements	Examples of sources of information	Finding & Evidence (FSC-ADV-40-016 v2 - Sources of information used to assess the indicators must be listed)	Result	
			Unspecified risk	Low
<p>5.1.1 The district of origin may be considered low risk in relation to wood from genetically</p>	<p>FAO, 2004. Preliminary review of biotechnology in forestry, including genetic modification. Forest</p>	<p>No G.M.O trees have been developed and or deployed in South African commercial</p>	<p>Low Risk</p>	

<p>modified trees when one of the following indicators is complied with:</p> <p>a) There is no commercial use of genetically modified trees of the species concerned taking place in the country or district concerned. OR</p> <p>b) Licenses are required for commercial use of genetically modified trees and there are no licenses for commercial use OR</p> <p>c) It is forbidden to use genetically modified trees commercially in the country concerned.</p>	<p>Genetic Resources Working Paper FGR/59E. Forest Resources Development Service, Forest Resources Division, Rome, Italy. Available online: http://www.fao.org/docrep/008/ae574e/AE574E00.HTM National and regional data sources</p>	<p>forestry. There is little or no chance any plantation will contain G.M.O.'s.</p> <p>GMOs are strictly Governed through the GENETICALLY MODIFIED ORGANISMS ACT, 1997 NO. 15 OF 1997 (GMO ACT)</p>	
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6 GENERAL

Requirements	Examples of sources of information	Finding & Evidence (FSC-ADV-40-016 v2 - Sources of information used to assess the indicators must be listed)	Result	
			Unspecified risk	Low
General search on the company	e.g. Google	Searched Google and Yahoo search engines and found no evidence of controversy related to the company or the districts from which logs are supplied.	Low Risk	

End of report