

| COMPANY NAME | AUDIT DATE/S | ASSESSMENT TYPE | |
|-----------------------------|--------------|-----------------|--|
| Sustainable Timber Tasmania | 30-05-24 | Surveillance | |

| Client Details | | | | | |
|--------------------------|--|------------------------------|--------------------|--|--|
| Scope of Certification | Procurement and sale of plantation and native forest woodchips for export. Physical separation method. | | | | |
| Certificate Number | PEFC 693186 | Expiry date | 27 June 2028 | | |
| SMO/s | 3780244 | ABN/ACN | 91 628 769 359 | | |
| Applicable Standard/s | PEFC ST 2002:2013 and PEFC ST | Г 2002:2020 | | | |
| Site Name/s | Head Office and Burnie Chip Export Facility | Assessment method: | On-site Assessment | | |
| Location Reference | FOREST-0047483115-001 | No of employees (FTE) | 3 | | |
| Site Address | Level 1, 99 Bathurst Street HOBA | ART Tasmania 7000 | | | |
| Client Representative | | | | | |
| Product group/s | Woodchips, roundwood and saw | n timber products | | | |
| Annual Turnover (\$) | | Notification Fee Category | Large | | |
| RW Logo Identifier | RW/1-31-324 | PEFC Logo Identifier | PEFC/21-31-324 | | |
| Assessor Details | | | | | |
| Assessor | | Role | Team Leader | | |
| Witness/Observer | N/A | | | | |

| Objective and Scope of Audit | | |
|------------------------------|--|--|
| Objective: | Verify conformance with the nominated Standard/s. | |
| Scope of audit: | Procurement and sale of plantation and native forest woodchips for export. Physical separation method. | |
| Criteria: | PEFC ST 2002:2020 | |
| Recommendation: | Certification continued | |

Executive Summary

This report presents the findings of a surveillance assessment of Sustainable Timber Tasmania's chain of custody processes, with respect to conformance with PEFC ST 2002:2013 and PEFC ST 2002:2020.

The audit included interviews with key personnel from and an and inspection at the Burnie Chip Export Terminal site to assess implementation of the Chain of Custody system.

STT continues to operate a very simple chain of custody system with 100% certified input. Key system processes such as internal audit and management review are effective. Non-conformances identified as part of a recent internal audit are being managed.

There were no non-conformances to close from the previous assessment and no new non-conformances were identified in this assessment. Opportunities for improvement are included in this report.

This assessment has confirmed that the management system continues to meet the requirements of the nominated Standards and supports a recommendation for continued certification to PEFC ST 2002-2020.



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| Audit Particip | ants | | | |
|-----------------------|----------|---------------|-----------------|-------------|
| Name | Position | Entry Meeting | Exit Meeting | Int. |
| | | | | \boxtimes |
| | | | | |
| | | | | \boxtimes |

Summary of Findings and Actions

| Major and Minor non-conformances identified during the previous assessment | | | |
|--|--|-----------------|--|
| Reference | Verification of actions taken. | Status | |
| | (Delete table or rows if not applicable) | Choose an item. | |
| | | Choose an item. | |
| | | Choose an item. | |

| Observations | Observations identified during this assessment | | |
|----------------|---|--|--|
| Reference | It was stated that sawmill residues from are no longer supplied and can be removed from the product category descriptions as a supplied product in the Woodchip Operation Chain of Custody Procedure. Similarly, the chipping activity at not within the boundaries of the Chain of Custody System being the point of transfer and claim input at the TasPort weighbridge and output as the claim on the STT Invoice to the customer FOB the Ship. | | |
| Observation #1 | | | |
| Observation #2 | The SOP Woodchip Unloading V3 does not include training for drivers delivery to South Stockpile (nor other drivers delivering material to North and East Stockpiles) of which stockpile to select when tipping Chips. | | |
| Observation #3 | It could not be confirmed that non-conformities arising from the most recent internal audit conducted on the 8 May 2024 and which related to procedural updates since the auditor had not yet been provided with the most recent version of the procedure. | | |
| Observation #4 | the superseded AS4707:2014 standard. may be deemed to be an outsourced process under the new standard. | | |
| Observation #5 | The Chain of Custody Procedure states that if wrong supplier material i.e. from stockpile North of East is placed on South Stockpile then a equal weight will be removed from the South Stockpile. Whilst this has apparently not happened in recent years this may require that the entire stockpile is reduce to 0% certified or required recognition (and due diligence processes to be applied) of certification claim of contaminant supplier and their percentage of claim to be applied to the entire stockpile. | | |

| Minor non-conformances identified during this assessment | | |
|--|------------------------------|--------|
| Reference | Statement of non-conformance | Status |



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| (Delete table or rows if not applicable) | Choose an item. |
|--|-----------------|
| | Choose an item. |

| Major non-conformances identified during this assessment | | | |
|--|--|-----------------|--|
| Reference | Statement of non-conformance | Status | |
| | (Delete table or rows if not applicable) | Choose an item. | |
| | o | Choose an item. | |

Next Visit Plan

| Next Visit Pla | in | | | | |
|----------------|--------------|----------|-------|------|----------|
| Audit type | Surveillance | Duration | 8 hrs | Date | 1-May-25 |



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Audit Findings.

4.1 General Requirements

| Ref: | Assessment criteria | Yes | No | N/A |
|------------------------------------|--|-------------------|---------------------|-------|
| 4.1.1 (5.1.3, 8.1) | Is the organisation operating a management system in accordance with the requirements of this Standard, to ensure correct implementation and maintenance of the PEFC chain of custody processes? | × | | |
| 0.1) | Is the management system appropriate to the type, range and volume of work performed, and cover outsourced activities relevant for the organisation's chain of custody (and all sites in the case of multi-site organisations)? | × | | 0 |
| 4.1.2 | Scope Has the organisation defined the scope of its PEFC chain of custody by specifying the PEFC product groups for which the requirements of the PEFC chain of custody are implemented? | | | |
| 4.1.3 | Can the organisation demonstrate that it only makes PEFC claims and PEFC related statements that are correct to the best of its knowledge and covered by its PEFC chain of custody? | ⊠ | | |
| The sco | ppe of the STT Chain of Custody system does not clearly describe the point at whits and claims are made from to the standard at BCET weighbridge. The peed as part if the site visit was E0 which was a mix of native forest and plantations | roduct | group | of |
| It was | demonstrated that only PEFC Claims are made as part for product categories that ody system. | | | chain |
| Observer remove Custod point of | vation #1 - It was stated that sawmill residues from the product in the Woodchip of Procedure. Similarly, the chipping activity at transfer and claim input at the Port weighbridge and output as the claim on the er FOB the Ship. | Operation undarie | on Chain s being | of |
| point or custom | f transfer and claim input at the Port weighbridge and output as the claim on the | Invoice | to t | the |

4.2 Documented procedures

opportunity for improvement is noted. Refer to comments for details.

| Ref: | Assessment criteria | Yes | No | N/A |
|----------------|--|-----|----|-----|
| 4.2.1 (8.3, | Has the organisation established documented procedures for its PEFC chain of custody? | ⊠ ⊠ | | |
| (8.3, 8.4) | Do the documented procedures include at least the following elements: a) a description of responsibilities and authorities relating to the PEFC chain of custody? | | | |



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| b) a description of the raw material flow/s within the production/trading process(es), including definition of product groups? | ′ ⊠ | |
|--|-------------|--|
| c) procedures for PEFC chain of custody process(es) covering all requirements of this standard, including: | s 🗵 | |
| i. identification of material categories | | |
| ii. physical separation of PEFC certified material, PEFC controlled sources material and other material | al 🖂 | |
| iii. definition of product groups, calculation of certified content, management of credit accounts, transfer to outputs (for organisations applying percentage or credit method) | | |
| iv. sale/transfer of products and PEFC claims, including documentation in which PEFC claims are made, and other on- and off-product trademark use | × | |
| v. record keeping | | |
| vi. internal audits and non-conformity control | | |
| vii. the Due Diligence System | | |
| viii. complaints resolution processes | | |
| ix. outsourcing | \boxtimes | |

Comments:

The Chain of Custody Procedure describes the chain of custody management system and its scheme-specific processes.

| Records required under the Chain of Custody system are maintained by | and | |
|--|----------|--|
| $x \in C_{\infty}(M_{\infty}) \cap C_{\infty}(M_{\infty})$ and $C_{\infty}(M_{\infty}) \cap C_{\infty}(M_{\infty})$ and $C_{\infty}(M_{\infty}) \cap C_{\infty}(M_{\infty})$ | 797 7797 | |

Assessment conclusion:

Compliant: The company is fully compliant with the requirements of the Standard.

4.3 Responsibilities and authorities

| Ref: | Assessment criteria | Yes | No | N/A |
|----------------------|---|-----|----|-----|
| 4.3.1.1 (8.2.1.1) | Policy Has the organisation's management defined and documented its commitment to implement and maintain the chain of custody requirements in accordance with this standard? | ⊠ | | 0 |
| | Is the organisation's commitment available to the organisation's personnel, suppliers, customers, and other interested parties? | | | |
| 4.3.1.2 (8.2.2) | Authorised representative Has the organisation's management appointed a member of the management who, irrespective of other responsibilities, has overall responsibility and authority for the organisation's PEFC chain of custody? | | | 0 |



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| implemen | ganisation identified the personnel performing activities for the ation and maintenance of its PEFC chain of custody and established responsibilities and authorities for the implementation of the procedures (iii.? | × | | |
|----------|---|---|--|--|
|----------|---|---|--|--|

Objective evidence:

- STT Chain of Custody Policy July 2020
- STT website

Comments:

The Chain of Custody Policy is unchanged and is communicated on the STT website. Roles and responsibilities are clearly defined. The Business Development Manager has overall responsibility for the implementation and maintenance of the Chain of Custody system.

Assessment conclusion:

Compliant: The company is fully compliant with the requirements of the Standard.

4.4 Record keeping

| Ref: | Assessment criteria | Yes | No | N/A |
|----------------|--|-----|----|-----|
| 4.4.1 (8.4) | In order to provide evidence of conformity with the requirements of this standard, has the organisation established and maintained at least the following records relating to the product groups covered by its PEFC chain of custody? a) Records of all suppliers of input material delivered with a PEFC claim, including evidence of the suppliers' PEFC certified status. | ⊠ | | |
| | b) Records of all input material, including PEFC claims and documents associated to the delivery of the input material, and for recycled input material, information demonstrating that the definition of recycled material is met. | × | | |
| | c) Records of calculation of the certified content, transfer of the percentage to output products and management of the credit account, as applicable. | | | |
| | d) Records of all products sold/transferred, including PEFC claims and documents associated to the delivery of the output products. | | | |
| | e) Records of the Due Diligence System, including records of risk assessments and significant risk supplies management, as applicable. | | | |
| | f) Records of internal audits, periodic chain of custody review, non-conformities and corrective actions. | × | | |
| | g) Records on complaints and their resolution. | | | |
| 4.4.2 | Are records maintained for a minimum period of five years? | | | |



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| Object | tive evidence: | | | |
|------------------------|--|-----|----|-----|
| Veri | ification record for on Responsible Wood Website | | | |
| Comm | ents: | | | |
| All relev | vant records are maintained electronically either in hard copy or electronically. | | | |
| | s of the due diligence process were available for review where a verification of ce sible Wood Website was undertaken. Inputs from a certified supplier are deemed | | | |
| Assess | sment conclusion: | | | |
| | | | | |
| Complia | nt. The company is fully compliant with the requirements of the Standard | | | |
| Complia | ant: The company is fully compliant with the requirements of the Standard. | | | |
| | ant: The company is fully compliant with the requirements of the Standard. Accourage management | | | |
| | | Yes | No | N/A |
| .5 R | esource management | Yes | No | N/A |
| .5 R Ref: | Assessment criteria | Yes | No | N/A |
| .5 R Ref: | Assessment criteria Human resources / personnel Has the organisation ensured and demonstrated that all personnel performing activities affecting the implementation and maintenance of its PEFC chain of custody | | | |

- SOP for Weighbridge V1
- SOP Woodchip Unloading V3
 Woodchip Unloading Truck Platform 2020

Comments:

provide induction training to all personnel who access the facility to tip chips and are trained in both the SOP for Weighbridge and SOP Woodchip Unloading V3 Woodchip Unloading Truck Platform 2020

Observation #2: The SOP Woodchip Unloading V3 Woodchip Unloading Truck Platform 2020 does not include training for drivers delivery to South Stockpile (nor other drivers delivering material to North and East Stockpiles) of which stockpile to select when tipping Chips.

Assessment conclusion:

Compliant: The company is generally compliant with the requirements of the Standard, however an opportunity for improvement is noted. Refer to comments for details.



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4.6 Inspection and control

| Ref: | Assessment criteria | Yes | No | N/A |
|---------------------|---|-----|----|-----|
| 4.6.1 | Internal audit | | | |
| (8.6) | Has the organisation conducted internal audits at least annually, and prior to the initial certification audit, covering its compliance with all requirements of this standard applicable to the organisation, including activities covered by outsourcing, and established corrective and preventive measures if required? | | | |
| 4.6.2 | Management review | | | |
| (8.2.1.3, 8.6.2) | Has the organisation's top management reviewed the results of the internal audits and the organisation's PEFC chain of custody at least annually? | | | |

Objective evidence:

- Stewardship and Environment Review Aug 23
- Forest Management System Management Review Day Minutes
- Internal Audit Schedule 2023/24
- Internal Audit Woodchip Management 8 May 2024

Comments:

A review of the results of the internal audit of the Woodchip procedure as part of the Stewardship and Environment Review Aug 23 indicated no issues. The management review meeting held on the 29 August included Chain of Custody.

Records required under the Chain of Custody system are maintained by

There are planned audits against the Chain of Custody processes for Bell Bay Operations under 4707. The corrective actions included updating the procedure to reflect the due diligence process, revise the procedure to reflect actual product categories, substantiated claim process, and product definition for claims.

Assessment conclusion:

Compliant: The company is fully compliant with the requirements of the Standard.

4.7 Complaints

| Ref: | Assessment criteria | Yes | No | N/A |
|------------------|---|-----|----|-----|
| 4.7.1 (8.3.1) | Has the organisation established procedures for dealing with complaints from suppliers, customers and other parties relating to its chain of custody, reflecting the requirements of 4.7.2 (below)? | | | |
| 4.7.2 (8.7) | For any complaints received in writing, can the organisation demonstrate that it has: a) formally acknowledged the complaint to the complainant within ten workdays | | | |
| | b) gathered and verified all necessary information to evaluate and validate the complaint and make a decision on the complaint; | | | |



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| | c) formally communicated the decision on the complaint and of the complaint handling | | |
|--------|--|--|--|
| | process to the complainant; and | | |
| | d) ensured that appropriate corrective and preventive actions are taken, if necessary? | | |
| N/A | nents: | | |
| W 100 | sessed as part of this assessment | | |
| Asses | sment conclusion: | | |
| Compli | ant: The company is fully compliant with the requirements of the Standard. | | |

4.8 Nonconformity and corrective action

| Ref: | Assessment criteria | Yes | No | N/A |
|----------------|---|-----|----|-----|
| 4.8.1 (8.4) | When a nonconformity with the requirements of this standard is identified through internal or external auditing (or any other process), has the organisation established procedures to: | | | |
| | a) react to the nonconformity and, as applicable: | | | |
| | i. take action to control and correct it | | | |
| | ii. address the consequences | | | |
| | b) evaluate the need for action to eliminate the causes of the nonconformity, in order that it does not recur or occur elsewhere, by: | | | |
| | i reviewing the nonconformity | | | |
| | ii determining the causes of the nonconformity | | | |
| | iii determining if similar nonconformities exist, or could potentially occur | | | |
| | c) implement any action needed | | | |
| | d) review the effectiveness of any corrective action taken | | | |
| | e) make changes to the management system, if necessary? | | | |
| 4.8.2 | Are corrective actions appropriate to the effects of the nonconformities encountered? | | | |
| 4.8.3 | Has the organisation retained documented information as evidence of: | П | П | × |
| | a) the nature of the nonconformities and any subsequent actions taken | | | |
| | b) the results of any corrective action | | | |

Objective evidence:

STT Woodchip Operation Chain of Custody Procedure - V.8 May 2024

Comments:

Observation #3: It could not be confirmed that non-conformities arising from the most recent internal audit conducted on the 8 May 2024 have been actioned and which related to procedural updates since the auditor had not yet been provided with the most recent version of the procedure.



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Assessment conclusion:

Compliant: The company is generally compliant with the requirements of the Standard, however an opportunity for improvement is noted. Refer to comments for details.

4.9 Outsourcing

| Ref: | Assessment criteria | Yes | No | N/A |
|----------------|---|-----|----|-----|
| 4.9.1 (8.8) | Has the organisation outsourced activities covered by its PEFC chain of custody to another entity? | × | | |
| 4.9.2 (8.8) | Through all stages of outsourcing the organisation is responsible for ensuring that all outsourced activities meet the requirements of this standard, including management system requirements. | | | |
| | Does the organisation have a written agreement with all entities to whom activities have been outsourced, ensuring that: | | | |
| | a) The material/products covered by the organisation's PEFC chain of custody are physically separated from other material or products; and | | | |
| | b) The organisation has access to the entity's site(s) for internal and external auditing of outsourced activities for conformity with the requirements of this standard? | | | |

STT Woodchip Operation Chain of Custody Procedure - V.8 May 2024

Comments:

Observation #4: are a contracted service provider, however the reference to the definition refers to the superseded AS4707:2014 standard. may be deemed to be an outsourced process under the new standard.

Assessment conclusion:

Compliant: The company is generally compliant with the requirements of the Standard, however an opportunity for improvement is noted. Refer to comments for details.

4.10 Social, health and safety requirements in chain of custody

| Ref: | Assessment criteria | Yes | No | N/A |
|-------------------|---|-----|----|-----|
| 4.10.1 (9.2.1) | Can the organisation demonstrate its commitment to comply with the social, health and safety requirements defined in this standard? | | | |
| 4.10.2 (9.2.2) | Can the organisation demonstrate that: a) workers are not prevented from associating freely, choosing their representatives and bargaining collectively with their employer: | | | |
| | b) forced labour is not used: | | | |
| | c) workers, who are under the minimum legal age, the age of 15, or the compulsory school attendance age, whichever is higher, are not used: | | | |
| | d) workers are not denied equal employment opportunities and treatment; and | | | |



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| | e) working conditions do not endanger safety or health? | | | |
|--|---|--|--|--|
|--|---|--|--|--|

Objective evidence:

Site visit identified LOTO Board to isolate heavy plant.

Comments:

Onsite visit to BCET indicated safety systems were in place to support the management of major shut. Isolation and work permit processes were in place for heavy plant whilst crane lifting activities and other works were being undertaken.

PPE is required to be worn as part of site visit. A major maintenance shut was underway at the site the site manager explained traffic management and communications as part of site visit.

Assessment conclusion:

Compliant: The company is fully compliant with the requirements of the Standard.

5 Identification of inputs and declaration of outputs

5.1 Identification of input material

| Ref: | Assessment criteria | Yes | No | N/A |
|----------------------------|--|-----|----|-----|
| 5.1.1 (4.1.1, 4.1.2) | For each delivery of material used as input for a PEFC product group, has the organisation obtained documentation with the following information from the supplier: a) supplier identification b) product identification c) quantity of products d) delivery identification based on date of delivery, delivery period, or accounting period? | | | |
| | For inputs with a PEFC claim, does the associated documentation also include: e) the organisation's name as the PEFC customer of the delivery; f) the applicable PEFC claim specifically for each claimed product covered by the documentation; and g) the certificate number of the supplier's PEFC recognised certificate? | × | | |
| 5.1.2 | Identification at supplier level: | | | |
| 5.1.2.1 (4.2.1) | For all inputs delivered with a PEFC claim, has the organisation verified that the supplier is covered by a PEFC recognised certificate on the PEFC website? | × | | |
| 5.1.2.2 (4.2.2) | For each delivery of material used as input for a PEFC product group, has the organisation classified the material category of the procured material? | | | |



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| _ | | | | |
|----|---|-----------------|-----------------------------|--------------|
| O | bjective evidence: | | | |
| • | BCET Daily Run | | | |
| • | CO_PLOG_BNCM-4090250524 | <u> </u> | | |
| • | Weighbridge calibration Certificate | QA No. | dated 26 Sept 2023 | |
| • | Burnie Nitens CoMngling Woodchip Vessel - | - Production Sc | hedule - Weekly Perspective | |
| C | comments: | | | |
| | ll inputs are 100% PEFC Certified and sourced om STT BNCM-100% RW / PEFC Certified #66 | | | The claim is |
| As | ssessment conclusion: | | | |
| Co | ompliant: The company is fully compliant with | the requireme | ents of the Standard. | |

5.2 Declaration of outputs

| Ref: | Assessment criteria | Yes | No | N/A |
|------------------|--|-------------|----|-----|
| 5.2.1 (7.1.3) | For outputs from a PEFC product group for which the organisation makes a PEFC claim to a PEFC customer, has the organisation supplied the customer with documentation that includes the following information for each delivery: | | | |
| | a) PEFC customer identification | | | |
| | b) the organisation's name as the supplier of the material | | | |
| | c) product identification | \boxtimes | | |
| | d) quantity of product(s) | | 1 | |
| | e) date of delivery / delivery period / accounting period | 1 | | |
| | f) the applicable PEFC claim specifically for each claimed product covered by the documentation | | | |
| | g) the certificate number of the organisation's PEFC recognised certificate? | | | |
| 5.2.2 | Has the organisation specified the type of documentation in which PEFC claims on outputs are made? | | | |

Objective evidence:

- Invoice for V2404
- Email dated 1/04/24
- Mates Receipt V2404
- Cargo Manifest of MV
- Certificate of Moisture and Chip Size Analysis

Comments:

Review of process for determining outputs from tonnes over weighbridge to management of stockpile using physical segregation method and shiploading to conversion as part of sales process to Bone Dry Metric Tonnes as part of laboratory report which stated that 53.6% was Dry Fibre Content and therefore quantity was 15,827 BDMT for where weight loaded was 29,528MT.



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| The em | st report states that for V2404 was 51,969 tonnes and sailing 13 April 2024 nail from to communicated that there was 38,175.71 available chips 29,528 tonnes (as per Mates Receipt) with a remaining stock being 8,647.71 with esidual stock after write down of 2,647 t. | | | |
|--------------|---|-----|------|------|
| | sment conclusion: | | | |
| Complia | ant: The company is fully compliant with the requirements of the Standard. | | | |
| | | | | |
| | rademark use | | | Teac |
| .3 T Ref: | Trademark use Assessment criteria | Yes | No | N/A |
| | | Yes | No 🗆 | N/A |

Objective evidence:

Invoice for V2404

Comments:

The chain of custody claim is made on the customer invoice however no logos are used on product

Assessment conclusion:

Compliant: The company is fully compliant with the requirements of the Standard.

5.4 Content of recycled material

| Ref: | Assessment criteria | Yes | No | N/A |
|----------------|---|-----|----|-----|
| 5.4.1 (1.4) | For products covered by the organisation's PEFC chain of custody that include recycled material, has the organisation calculated the content of recycled material based on ISO 14021 and is the organisation able to provide information about it upon request? | | | |

Objective evidence:

Not required

Comments:

does not use or handle recycled material.

Assessment conclusion:

Compliant: The company is fully compliant with the requirements of the Standard.



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6 Chain of custody methods

6.1 General

| Ref: | Ass | sessment criteria | Yes | No | N/A |
|----------|--------|---|-------------|----|-----|
| 6.1.1 | The | Chain of custody method/s chosen include: | 7.7 | | |
| | | Physical separation method | | | |
| | | Percentage method | \boxtimes | | |
| | | Credit method | | | |
| | Has | the organisation chosen the appropriate method/s? | | | |
| 6.1.2 | | the organisation implemented the chosen chain of custody method(s) of this dard for the specific PEFC product groups? | | | |
| 6.1.3 | | PEFC product groups established for products with equivalent input material, with same measurement unit or units that can be converted into a single measurement? | | | |
| 6.1.4 | | s the organisation only use PEFC certified material and PEFC controlled sources erial as input for PEFC product groups? | | | |
| Objec | tive e | evidence: | | | |
| CO_PL | OG-BI | NCM-4090250524 | | | |
| Comn | nents | | | | |
| All inpu | t mate | erial is 100% PEFC certified as per weighbridge claims. | | | |

6.2 Physical separation method

Compliant: The company is fully compliant with the requirements of the Standard.

Assessment conclusion:

| Ref: | Assessment criteria | Yes | No | N/A |
|---------|---|-------------|----|-----|
| 6.2.1 | Where the organisation is applying the physical separation method, is material with different material categories and different certified content kept separate or clearly identifiable at all stages of the production or trading process? | \boxtimes | | |
| 6.2.2 | Where material with different certified content is used as input in the same PEFC product group, has the organisation used the lowest certified content of the input as certified content of the output? | | | × |
| 6.2.2.1 | Where PEFC certified material and PEFC controlled sources material is used as input in the same PEFC product group under the physical separation method, has the organisation claimed the output as PEFC controlled sources? | | | × |



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Objective evidence:

STT Woodchip Operations – Chain of Custody Procedure V.8 May 2024

Comments:

There is only one material category entering the BCET. There are however other woodchips from other suppliers, namely that are not within the scope of STT Chain of Custody system. Segregated stockpiles are maintained namely the 'South Stockpile' for STT equipment. Once south stockpile is selected all chip is automatically run out of the conveyer if a change is required before the chip is tipped.

Observation #5: The Chain of Custody Procedure states that if wrong supplier material i.e. from stockpile North or East is placed on South Stockpile, then chips of an equal weight will be removed from the South Stockpile. Whilst this has apparently not happened in recent years this may require that the entire stockpile is reduce to 0% if chip is not certified or require recognition (and due diligence processes to be applied) of certification claim of contaminant chip supplier and their percentage of claim to be applied to the entire stockpile since it may be a lower percentage than 100%.

Assessment conclusion:

Compliant: The company is generally compliant with the requirements of the Standard, however an opportunity for improvement is noted. Refer to comments for details.

6.3 Percentage method

| Refi | Assessment criteria | Yes | No | N/A |
|---------|---|--------------|--------------|----------|
| 6.3.1 | Are PEFC certified material and PEFC controlled sources material used as input material for the purpose of calculation of certified content? | - | - | - |
| 6.3.2 | Calculation of certified content | | | |
| 6.3.2.1 | Has the organisation calculated the certified content separately for each PEFC product group and for a specific claim period according to the correct formula? | ₽ | — | ₽ |
| 6.3.2.2 | Has the organisation calculated the certified content based on a single measurement unit used for all material covered by the calculation. | ₽ | ₽ | ₽ |
| | In case of conversion to a single measurement unit for calculation purposes, has the organisation used generally recognised conversion ratios and methods? | ₽ | # | ₽ |
| | If a suitable, generally recognised conversion ratio does not exist, has the organisation defined and used a reasonable and credible conversion ratio? | — | - | = |
| 6.3.2.3 | Has the organisation ensured that, if input material/products include only a proportion of PEFC certified material, then only the quantity corresponding to the certified content can enter the calculation formula as PEFC certified material? | - | = | - |
| | Has the organisation ensured that the rest of the material enters the calculation as PEFC controlled sources material? | ₽ | = | ₽ |
| 6.3.3 | Is the certified content calculated for a PEFC product group used as that percentage in the PEFC claim "X% PEFC certified"? | | | = |
| 6.3.4 | Has the organisation applied the percentage method as rolling percentage? | — | ₽ | ₽ |



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| | The state of the s | | N EVALUATION IN | |
|--------------------|--|---|-----------------|----------|
| 6.3.5 | For organisations applying the rolling percentage, he certified content of a PEFC product group and claim during an input period preceding the claim period? | - | - | - |
| | Does the claim period, in the case of rolling percent input period not exceed 12 months (unless justified | Ð | ₽ | ₽ |
| | ctive evidence: te required | | | |
| Washington and the | nents: | | | |
| Not ap | plicable. | | | |
| Asses | sment conclusion: | | | |
| Choose | an item. | | | |

6.4 Credit method

| Ref: | Assessment criteria | Yes | No | N/A |
|------------------|--|--------------|--------------|--------------|
| 6.4.1 | Is the credit method used to transfer credits gained from the input of PEFC certified material to PEFC controlled sources material within the same PEFC product group. | - | ₽ | — |
| 6.4.2 | Has the organisation created and managed a credit account for credits gained from input of PEFC certified material? | | Ð | B |
| | Are the credits calculated in a single measurement unit? | | - | ₽ |
| | Has the organisation defined conversion factor(s) for the conversion of the measurement unit(s) of the input components to the output products? | = | ₽ | - |
| 6.4.3 | Can the organisation demonstrate that the total quantity of credits accumulated in the credit account does not exceed the sum of credits entered into the credit account during the last 24 months? | ₽ | ₽ | 0 |
| | Has the 21-month maximum period been extended? | ₽ | ₽ | ₽ |
| | If so, can the organisation justify why the average production period of the product in question is longer than 24 months? | - | - | 4 |
| 6.4.4 | Has the organisation applied the credit method for a single claim? | | ₽ | — |
| | In situations where the organisation is receiving deliveries of material with a PEFC claim and a claim against another certification system, has the organisation either used it as a combined credit covering both claims or only used one of the received claims for calculating the volume credits? | 4 | 4 | = |
| 6.4.5 | Has the organisation calculated the credits using: | | | |
| | a) certified content and volume of output products (clause 6.4.8) or | — | - | - |
| | b) input material and input-to-output ratio (clause 6.4.7)? | ₽ | ₽ | - |
| 6.4.6 | Does the organisation applying the credit method calculate the credits by multiplying the volume of output products of the claim period with the certified content for the relevant claim period? | - | - | - |



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| 6.4.7 | Can the organisation demonstrate that a verifiable ratio between the input material | | | |
|--------|--|-------------|-------------|--------------|
| | and output products has been used to calculate the credits directly from input of PEFC certified material by multiplying the volume of PEFC certified material input with the input to output ratio? | | | |
| 6.4.8 | Has the organisation distributed the credits from the credit account to the output products covered by the credit account? | = | - | - |
| | Are the credits distributed to the output products in a way that the certified products will be considered as either having 100% certified content or as having less than 100% certified content and meeting the organisation's own threshold? | П | Ф | — |
| | Is the result of the volume of output products multiplied by the certified content of the output products equal to the distributed credits withdrawn from the credit account? | 4 | - | — |
| Objec | ctive evidence: | | | |
| • No | t required | | | |
| Comn | nents: | | | |
| Not ap | plicable. | | | |
| Asses | sment conclusion: | | | |
| Choose | an item. | | | |

7 Due Diligence System (DDS) requirements

| Ref: | Assessment criteria | Yes | No | N/A |
|--------------------------------|--|-----|----|-----|
| 7.1.1 (5.1, 5,2, 5.3) | Has the organisation exercised due diligence (in line with the PEFC Due Diligence System (DDS) for the avoidance of material from controversial sources laid down in Appendix 1 of this standard) for all material used as input for a PEFC product group, except recycled material? | | | Ø |
| | Has the organisation established that (for material used as input for PEFC product groups) there is "negligible risk" that it originates from controversial sources and that it meets the definition of PEFC controlled sources material? | | | × |
| 7.1.2 (5.4) | Has the organisation met the following requirements for PEFC product groups where only input material used was delivered with a PEFC claim by a supplier covered by a PEFC recognised certificate, in implementing its PEFC DDS? by meeting the following requirements? | П | | × |
| | a) In order to enable PEFC certified and uncertified entities further down the supply chain to implement a DDS, has the organisation, upon request, provided the information specified in Appendix 1, 2.1 for material passed on with a PEFC claim. | | | |
| | If the organisation did not possess the requested information, was the request passed on to relevant supplier(s) of the organisation (Appendix 1, 2.2)? | | | × |
| | b) Where internal or external substantiated concerns on the origin of input material from controversial sources were raised, has the organisation followed up on these concerns following Appendix 1, 4? | | | |



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| | c) Has the organisation defined, documented and implemented a commitment and a procedure, also covering forest and tree based material/products not covered by the organisation's PEFC chain of custody, ensuring that where it is known to the organisation, or where it has received substantiated concerns, that forest and tree based material/products originates in illegal sources (controversial sources, 3.7a), it will not be placed on the market until the concern has been resolved in accordance with Appendix 1, 4? | | ⊠ |
|--------|--|--|---|
| Obje | ctive evidence: | | |
| N/A | | | |
| Com | ments: | | |
| Not as | ssessed as part of this assessment | | |
| Asse | ssment conclusion: | | |
| Choos | e an îtem. | | |

Appendix 1: Due Diligence System (DDS) requirements

1. General requirements

| Ref: | Assessment criteria | Yes | No | N/A |
|------|---|-----|----|-----|
| 1.1 | Does the organisation operate a Due Diligence System (DDS), in accordance with the requirements of this standard? | | | |
| 1,2 | Does the PEFC DDS apply to all input forest and tree based material covered by the organisation's PEFC chain of custody and PEFC product groups, with the exception of recycled material? | | | × |
| 1.3 | Does the PEFC DDS incorporate three steps relating to: a) gathering information b) risk assessment c) management of significant risk supplies? | | | |
| 1.4 | If the organisation procures raw material originating from species listed in Appendix I to III of CITES, can it demonstrate that it complies with applicable legislation relating to CITES? | | | |

2. Access to information

| Ref: | Assessment criteria | Yes | No | N/A |
|------|---|-----|----|-----|
| 2.1 | In order to enable the organisation to implement the PEFC DDS, does the organisation have access to the following information from its supplier(s): | | | |
| | a) Identification of tree species included, or list of tree species potentially included, in the material/product by their common name and/or their scientific name where applicable; and | | | |
| | b) Country of harvest of the material and where applicable sub-national region and/or concession of harvest. | H. | | |



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| 2.2 | In order to enable PEFC certified and uncertified entities further down the supply chain to implement a DDS, does the organisation, upon request, provide the information specified in 2.1 of this appendix for material passed on with a PEFC claim? | | | | |
| | If the organisation does not possess the requeste on to relevant supplier(s) of the organisation? | ed information, is the request passed | | | |

3. Risk assessment

| Ref: | Assessment criteria | Yes | No | N/A |
|------|--|-----|----|-----|
| 3.1 | Does the organisation carry out a risk assessment, assessing the risk of procuring raw material from controversial sources for all input forest and tree based material covered by the organisation's PEFC chain of custody, with the exception of material/products delivered with a PEFC claim by a supplier with a PEFC recognised certificate, as this material can be considered as having "negligible risk" of originating in controversial sources? | | | × |
| 3.2 | Does the organisation's risk assessment result in the classification of material into "negligible" or "significant" risk category. | | | |
| 3.3 | Is the organisation's risk assessment based on the indicators for risk at origin and supply chain level listed in Tables 1- 3 in Appendix 1? | | | |
| 3.4 | Where the organisation's risk assessment identifies indicators specified in Table 1, does the organisation consider the material as having "negligible risk" to originate in controversial sources, and conclude the risk assessment without having to consider the indicators outlined in tables 2 and 3? | | | |
| 3.5 | Where the organisation's risk assessment does not identify indicators specified in Table 1, is the risk assessment continued against indicators outlined in Tables 2 and 3; and where any of these indicators apply, does the organisation consider the material as having "significant risk" to originate from controversial sources? | | | |
| 3.6 | Where none of the indicators outlined in tables 2 and 3 are identified, does the organisation consider the supplies as having "negligible risk" to originate from controversial sources, and conclude the risk assessment? | | | × |
| 3.7 | Is the risk assessment carried out for the first delivery of every individual supplier, or for several suppliers, with the same characteristics (as listed in 2.1 of Appendix 1), and the same applicability of indicators according to Tables 1-3? | | | |
| 3.8 | For all material that is subject to the organisation's risk assessment, does the organisation keep an updated list of characteristics (as listed in 2.1 of Appendix 1)and indicators according to Tables 1-3 for supplies of individual suppliers and suppliers that share the same characteristics? | 0 | | |
| 3.9 | Is the risk assessment reviewed and if necessary revised at least annually, and when changes regarding the characteristics (as listed in 2.1 of Appendix 1) occur? | | | |

4. Substantiated concerns

| Ref: | Assessment criteria | Yes | No | N/A |
|------|--|-----|----|-----|
| 4.1 | Does the organisation ensure that substantiated concerns about the potential origin of material covered by the organisation's DDS in controversial sources are promptly investigated, starting no later than ten workdays as of identification of the substantiated concern? | | | × |



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| 4.2 | If the concern cannot be resolved by the organisation's investigation, is the risk of the relevant material being from controversial sources determined as "significant" and | | |
|-----|--|------|---|
| | managed in accordance with clause 5 of Appendix 1? | | - |

5. Management of significant risk supplies

| Ref: | Assessment criteria | | No | N/A | |
|--|---|--|----|-----|--|
| 5.1 5.1.1 | General For supplies identified as having "significant risk", does the organisation request the supplier to provide additional information and evidence that allows the organisation to | | | | |
| | classify the supply as having "negligible risk"? Does the organisation request the supplier to: a) Provide the organisation with necessary information to identify the forest area(s) of the raw material and the whole supply chain relating to the "significant risk" supply? b) Enable the organisation to carry out a second party or a third party inspection of the supplier's operation as well as operations of the previous suppliers in the chain? | | | ⊠ | |
| 5.1.2 Has the organisation established a second or third party verification program for supplies classified as "significant risk"? Does the verification program cover: a) identification of the whole supply chain and forest area(s) of the supply's origin b) on-site inspection as appropriate; and c) corrective measures as required | | | | | |
| 5.2 5.2.1 | Identification of the supply chain | | | × | |
| 3 | Note: In cases where the supplies can be verified as "negligible risk" (according to the indicators in Table 1 in Appendix 1) at one step in the supply chain the organisation is not required to track the whole supply chain to the forest area. | | | | |
| | Otherwise, has the organisation dealt with any substantiated concerns, and were they addressed as outlined in Appendix 1, clause 4? | | | | |
| 5.2.3 | Does the organisation require the supplier of the information submitted to allow the organisation to plan and execute on-site inspections? | | | | |
| 5.3 5.3.1 | On-site inspections Does the organisation's verification program include on-site inspections of suppliers delivering "significant risk" supplies? | | | | |
| | Are the on-site inspections be carried out by the organisation itself (second party inspection) or by a third party on behalf of the organisation? Does the organisation substitute the on-site inspection with documentation review where the documentation provides sufficient confidence in the material origin in non- | | | | |
| F 2 2 | controversial sources? | | | | |
| 5.3.2 | Can the organisation demonstrate that personnel carrying out inspections has sufficient knowledge and competence in the local business, cultural and social customs, and applicable treaties, conventions legislation, governance and law enforcement, relevant to the origin of "significant risk" supplies and to the risk(s) identified? | | | | |
| 5.3.3 | Has the organisation determined the sample of "significant risk" supplies from the supplier to be verified by the verification program? | | | | |



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| 5.3.4 | Do the on-site inspections cover: a) The direct supplier and all previous suppliers in the supply chain in order to assess compliance with the supplier claims on the origin of the raw material; and b) the forest owner / manager of the forest area of the supply origin, or any other party responsible for management activities on that forest area, in order to assess their compliance with legal requirements? | | ⊠ |
|-------|--|---|---|
| 5.4 | Corrective measures | | |
| 5.4.1 | Has the organisation defined written procedures for implementing corrective measures for noncompliance for suppliers identified by the organisation's verification program? | | |
| 5.4.2 | Is the range of corrective measures based on the scale and seriousness of the risk that forest and tree based product(s) may be from controversial sources and does it include at least one or more of the following: | | |
| | a) Clear communication of the risk identified with a request for addressing the risk identified within a specific timeline so as to ensure that forest and tree-based product(s) from controversial sources is not supplied to the organisation; and/or | П | × |
| | b) Requiring suppliers to define risk mitigation measures relating to compliance with legal requirements in the forest area(s) or efficiency of the information flow in the supply chain; and/or | L | М |
| | c) Cancellation or suspension of any contract or order for forest and tree-based product(s) until the supplier can demonstrate that appropriate risk mitigation measures have been implemented? | | |

6. Non placement on the market

| Ref: | Assessment criteria | Yes | No | N/A |
|-------------|--|-----|----|-----|
| 6.1 | Can the organisation demonstrate that forest and tree-based material/products from unknown sources or from controversial sources cannot be included in a PEFC product group? | | | |
| 6.2 | Can the organisation demonstrate that where it is known to the organisation that forest and tree based materials/products not covered by the organisation's PEFC chain of custody originate in illegal sources (controversial sources, 3.7a), it will not be placed on the market? | | | |
| 6.3 | Where the organisation has received substantiated concerns that forest and tree based materials/products not covered by the organisation's PEFC chain of custody originate in illegal sources (controversial sources, 3.7a), can the organisation demonstrate that any such material will not be placed on the market until the concern has been resolved in accordance with clause 4 of Appendix 1. | | | |
| N/A Comm | tive evidence: nents: sessed as part of this assessment | | | |
| Asses | sment conclusion: | | | |
| Choose | an item. | | | |



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Appendix 2: Corrective and Preventive Action Plan

(copy and paste findings from ereport)

Instructions to client

For each finding, you are required to determine the cause and describe the proposed action plan in order to address each finding. BSI will finalise this report once the action plan is accepted.

| Finding Reference | Certificate Reference | |
|-------------------------|--------------------------|--|
| Certificate Standard | Clause | |
| Category | | |
| Area/Process | | |
| Details | | |
| Cause | | |
| Correction/containment | | |
| Corrective action | | |
| Status | | |



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DEFINITIONS

Major nonconformity

The absence of, or failure to implement and maintain, one or more requirements of the chain of custody standard, that may result in a systemic risk to the function and effectiveness of the chain of custody and/or effects confidence in the client organisation's claims on certified raw material.

Note: A major nonconformity may be an individual nonconformity or a number of minor but related nonconformities, that when considered in total are judged to constitute a major nonconformity.

Minor nonconformity

A single failure to fulfil the requirements of the chain of custody standard that may result in no systemic risk to the function and effectiveness of the chain of custody and/or effects confidence in the supplier's claims on certified raw material.

Observation (Opportunity for improvement)

An evaluation finding that does not warrant nonconformity but is identified by the audit team as an opportunity for improvement.

CONFIDENTIALITY

This report is prepared by representatives of BSI in relation to the above-named client's conformance to the nominated standard(s), and is relevant only to the scope of business sites and activities defined in the 'Scope of Certification'. Audits are undertaken using a sampling process, and the report and its recommendations are reflective only of activities and records sighted during this audit.

BSI shall not be liable for loss or damage caused to, or actions taken by, third parties as a consequence of reliance on the information contained within this report or its accompanying documentation. Unless required by the Standard Owners, or BSI Accreditation Bodies during periodic audits, information concerning the organisations audit report, findings or records will not be disclosed to an external 3rd party without the organisations consent.

PROVISION FOR CUSTOMER FEEDBACK

BSI appreciates the feedback on the BSI auditor's performance and the overall experience with the certification process. The Client Feedback Policy and Procedure can be accessed on the BSI website. http://www.bsigroup.com/en-AU/Our-services/Client-Feedback/

REVISION HISTORY

| Date | Revision Number | Revised by: | Approved by | Description of changes |
|------------|--------------------|-------------|-------------|--|
| April 2020 | Version 9 | | | Complete rewrite in line with new version of Standard. |
| July 2020 | Version 10 | | | Add references to PEFC ST 2002:2013 |
| Oct 2020 | Version 11 | | | Update of DDS requirements (Appendix 1). |
| Nov 2020 | Version 12 | | | Correction to section 4.3 and 5.2.2. |
| Nov 2020 | Version 13 | | | Addition of Appendix 2 (CAPA). Next visit plan moved to front. |