

Fiji Pine Ltd Controlled Wood Risk Assessment and Due Diligence system stakeholder engagement report.

Public copy.

Executive summary

A 60-day consultation period for its FSC Controlled wood Due diligence system and related Extended company risk assessment.

Comments were received and analysed. Comments were received and considered. At a general meeting comments were received about the wording of the ECRA 1.1. For 1.1 the amendment was accepted as follows:

“This is because most land in Fiji (87%) is indigenous owned and government land”

For 1.14 relating to FPIC there was a comment:

“feedback from stakeholders indicated that in some circumstances the iTLB (Indigenous land management Boards) can make decisions on behalf of landowners without consultation so FPIC may not be considered as automatically given”

This was followed up by consultation with the iTLB . They responded with a Letter from the iTAUKEI LAND TRUST BOARD Dated 9 September 2021. In this letter they pointed out the Legal and Constitutional situation which demonstrated that the amendments iTaukei Land Trust Act does not in any way remove from the iTaukei landowners’ ownership over iTaukei land and the Board is still required to consult with the iTaukei landowners.

As a result of this letter the designation of 1.14 remained as Low risk for FPIC.

As the Landowner meetings at the Village level required Fiji Pine also sought Free Prior and Informed consent and undertook to give more information about the concept of FSC Mixed and controlled wood.

Introduction

Fiji Pine Ltd are certified to FSC sustainable plantation forests for its estate. They are now seeking to take noncertified wood to do this Fiji Pine group are seeking certification the standards “Requirements for Sourcing FSC® Controlled Wood FSC-STD-40-005 V3-1 EN”.

Because there is no National Risk Assessment or Centralised National Risk assessment in Fiji. Fiji Pine used FSC-PRO-60-002A V1-0 EN FSC NATIONAL RISK ASSESSMENT FRAMEWORK to develop an Extended company risk assessment (ECRA) This approach may only be conducted for unassessed risk areas where there is no FSC risk assessment available.

A key requirement of FSC-STD-40-005 is that the ECRA, including its justifications for designations of low risk and specified risk is widely consulted. In addition, a key requirement of FSC-STD-40-005 is that the Due diligence system developed to define control measures to address specific risk is widely consulted.

This report outlines the process and outcomes of these consultation.

How are stakeholders identified?

Fiji Pine Ltd have developed a stakeholder database. In the database stakeholders are defined as interested and affected parties¹.

¹ Affected Stakeholders include direct neighbours and local communities and any others whom your operations may affect.

Interested stakeholders.

These are people or groups not directly affected operations but with a relevant interest. National or regional NGO groups with a general focus on rural industry are likely to be interested parties.

,

Given the nature of land ownership in Fiji where most of the land is in the hands of indigenous Landowners these are considered the main affected stakeholders.

How is the consultation recorded?

The following are required:

- a) Names and contact details of individuals and organizations consulted
- b) Notes on all information received orally, e.g., minutes of community meetings, E mails or other contributions.
- c) Copies of all correspondence and/or written comments received.

The stakeholder engagement protocol.

Fiji Pine Ltd

- Identified the stakeholders to be contacted from the Stakeholders database.
- Identified the best methods(s) to contact the identified stakeholders.
- Prepared the consultation material according to the certification standards. This included plan language versions of the Extended company risk assessment and a version of this document in iTaukei, the main Fijian Dialects.
- Reached out to identified stakeholders with materials and gave a 60 day deadline for responses. Including posting on the Company web site and FSC Australia web site. <https://au.fsc.org/en-au/standards/seeking-comment-01>
- Responded to the stakeholder showing how the feedback was handled.
- Prepared the final report/record of the consultation and published a public summary version of the report.

Stakeholders contacted

The stakeholder list contains stakeholder personal information and is not publicly disclosed. The full list of stakeholders is made available to the Certification body at the time of the FSC Audit.

Stakeholder engagements contact letter.

1. General call for public participation.

Stakeholder Engagement Contact Letter

To: Interested parties

From: Fiji Pine Group Ltd

Date: Tuesday, 27 July 2021

Re: Seeking stakeholder comments on Fiji Pine Group Ltd Forest Controlled Wood Risk Assessment and Due Diligence system.

Call for public participation.

Fiji Pine group are seeking certification the standards “Requirements for Sourcing FSC® Controlled Wood FSC-STD-40-005 V3-1 EN”

Controlled wood standards apply to wood that is not grown by Fiji Pine group Ltd is:

1. Not be illegally harvested
2. Does not come from forestry areas where wood has been harvested in a way that violates traditional and human rights.
3. Does not come from forest where high conservation values are threatened by management activities.
4. Does not come from native forests that are being cleared for plantations or non-forest use
5. Does not come from genetically modified trees

There are also strict rules for using controlled wood with FSC-certified wood. A risk assessment must be carried out and from this a due diligence system must be developed. This will be audited.

We are now seeking your comments.

All of the documents can be accessed here.

A summary of the risk assessment and due diligence in English. ([link](#))

A summary of the risk assessment and due diligence in i-Taukei. ([link](#))

The full Risk assessment. ([link](#))

The full Due diligence system. ([link](#))

Please provide your
comments within 60 days

to: Ashiana Hassan
Manager Operations/ FSC
Administrator
Fiji Pine Limited
ashiana.hassan@tropik.com.fj
/ 9993114

2. Invitation to a general roundtable consultation on Wednesday the 08th of September 2021.

Time: 9am to 10am FJT

From: **Ashiana Hassan** <ashiana.hassan@tropik.com.fj>

Date: Wed, Sep 1, 2021 at 11:57 AM

Yadra Vinaka Dear Stakeholders

Fiji Pine Group has leases for 83545.71Ha of Pine trees. Fiji Pine Group also holds Forest Stewardship Council

(FSC) certification.

Fiji Pine Group now wants to use wood from landowners but it is not able to include this in its FSC certified system. This is because it did not plant the trees and does not own them. FSC allows companies to buy trees from other landowners. It can then harvest them as what is called “controlled wood”.

Fiji Pine Group is expanding its Forest Stewardship Council certification scope for our TWIL mill from FSC 100% to FSC Mixed.

We had started our initial consultations in 2020 for this certification purposes, we are now in the phase of consultation.

These 60 days began on the 27th of July 2021 and will come to an end on 27th September 2021 as per our FB posts and website updates. Our LOU consultations will be wrapped up by this weekend and so we would like to do a round table discussion on this with you stakeholders with expert reviews and feedbacks.

We are calling in this consultation for us to finalize the documents. The documents attached are as follows:

1. Extended company risk assessment
2. Due diligence system
3. Summary of ECRA & DDS English
4. Summary of ECRA & DDS iTaukei

This is to get the woodlot pine coming under controlled wood certifications and our COC certificates will not be harmed.

Controlled wood can then be used under a company's FSC certificate BUT it is not FSC certified. A company can mix it with FSC-certified wood – but no more than 30 percent of the mix can be controlled wood.

There are also strict rules for using controlled wood with FSC-certified wood. A risk assessment must be carried out. Here is what the risk assessment will check.

1. The controlled wood must not be illegally harvested
2. It must not come from forestry areas where wood has been harvested in a way that violates traditional and human rights.
3. It must not come from forest where high conservation values are threatened by management activities.
4. It must not come from native forests that are being cleared for plantations or non-forest use
5. It must not come from genetically modified trees

How it will be done?

1. Once we get consents from LOUs that they are willing to give their pine forest for us to log.
2. Once we get the written consent then we will do the same operations replication for our forest to these woodlot areas.
3. In this document this has been highlighted along with the risk factor.

Why are we doing this?

1. FPL wants other LO's get the same benefits as what the FPL LOUs are getting - for eg when this Fiji Pine Scheme was set up it was done in remote areas including maritime areas. So while our LOUs are benefiting the

others are left out - so FPL is extending this returns to other LOs for their benefits

2. For the sustainability of Pine Plantations - because private sawmillers are robbing the pine owners they invest in fully matured plantation and leave. No one is there to replant - once FPL gets on hand we ensure we plant these areas with Land owners and Forestry Department.

3. We would like to lease areas that are plantable - harvesting and replanting to increase our net stock areas.

What is an ECRA?

This is the first draft of you FSC Controlled Wood Extended Company Risk Assessment (ECRA) done in the format advised in the controlled wood standards FSC STD 40 005 V 3.1 EN and conforming to the requirements of the FSC® National Risk Assessment Framework FSC-PRO-60-002a V1-0 EN

What is a DDS?

This is where a company explains how they have used the national risk assessment and what control measures they have put in place to address the specified risk identified in the FSC National Risk Assessment. In the case of Fiji pine there is no National Risk Assessment so we have developed our own Extended Company risk assessment.

The time of the roundtable consultation is on Wednesday the 08th of September 2021.

Time: 9am to 10am FJT

Facilitated through Zoom: Tropik Infor

Links to the meeting will be sent through by our IT team.

You all are welcome to comment and give in your views in a written manner by 4.00pm on 10th September 2021.

Our consultant from Pinnacle Quality - Mr. Kevin is also copied on this email for his information - he shall join this consultation on Wednesday.

Please call in if clarifications are needed.

PS: These documents can be shared and we are accepting written comments.

Kind Regards

Ashiana Hassan

Appendix 1 Records of individual stakeholders consulted.

1 There were Landowner meetings in all of these areas where third party wood is sourced. These deal with commercial issues such as process but also covered the topics around Controlled wood including the ECRA and the Due Diligence system. The landowners were not experts on the process control measures e.g. HCV so comments were limited. The main aim of the process was for Fiji Pine to ensure Free Prior and Informed consent to at the landowner level.

Comments of note and responses were:

Comments	Response to comments
<p>They are willing to give their woodlot to FPL <input type="checkbox"/> They will have a Talanoa session among themselves before we hand them consent form and land demarcation from next Monday.</p>	<p>Await consent forms after Talanoa session</p>
<p>The FSC mixed discussion was for information only. No woodlots are available at this time.</p>	<p>No follow up</p>
<p>Requesting new road construction</p>	<p>Agreed</p>
<p>Consent form needs to be given to the Turaga Ni Mataqali – 60% signatures needs to be obtained.</p> <p>Area will need to be demarcated by our GISO Information obtained should be submitted to HQ for records and forestry. After verification, release letter will be given to FPL to receive the products.</p>	<p>No Follow up.</p>
<p>Brochures for this FSC Mix to be done</p>	<p>Draft prepared as part of the Minutes.</p>

so that we are able to convince the Woodlot owners not only verbally but also present a hardcopy of the purpose of this visit.	
Brochures for this FSC Mix to be done so that we are able to convince the Woodlot owners not only verbally but also present a hardcopy of the purpose of this visit.	Agreed
Brochures for this FSC Mix to be done so that we are able to convince the Woodlot owners not only verbally but also present a hardcopy of the purpose of this visit.	Agreed
LOU sign woodlot consent form when agreed (60% signature).	Agreed.
LOU sign woodlot consent form when agreed(60% signature)	Agreed
The FSC mixed discussion was for information only. No woodlots are available at this time.	

2. There was a general roundtable consultation on Wednesday the 08th of September 2021. Time: 9am to 10am FJT

Comments (summary):

Agenda – Discussion

Question Seeds sources are not genetically modified for controlled wood

FPL responses are seeds are being sourced from Australia and no possible GMOs.

HCVF – areas using WWF Toolkit

Comment No national data present

Response FPL does its own verifications and protection and has a database

Comment – fantastic job done by FPL for its HCVF areas as from past audits, including landowner benefits, standard operations

Comment - Agrees to the above by the standard used by FPL – should be replicated to controlled wood.

Comment - Traditional & Human Rights, FPL is fantastic, take care of this things and does it themselves rather than relying on any other party

Comment - Forestry graduate recruits with FPL now directly from FNU – gender equality.

Comment - Controversial Topic – Bill No.17

Indigenous rights are taken over by government, Land ownership structure has been touched

FPLs response – a statement from iTLTB that no indigenous rights are violated under this Bill by the government, FPIC – free prior and informed consents will be practiced.

3. Other responses to the call for public participation.

There were no other responses.