



FIJI PINE GROUP: Due Diligence System according to FSC-STD-40-005 (V3.1) EN. REQUIREMENTS FOR SOURCING FSC® CONTROLLED WOOD.

Introduction

Fiji Pine Group produces soft wood sawn timber products and wood chips. Supply for FIJI PINE GROUP LTD's products comes from a variety of plantation sources. Some are local FSC™ certified, and some are local controlled material source. All wood sourced is plantation grown species mainly Caribbean Pine - Pinus caribaea and Slash Pine- Pinus elliottii, in the Viti Levu and Vanua Levu Islands of Republic of Fiji.

Suppliers are all private wood lots supplying Controlled material and are covered by this FSC™ Controlled Wood Due Diligence System.

For all suppliers including third party private growers, detailed records are kept of supplying blocks, and these are made available to FSC™ auditors.

Due Diligence system

This document outlines the Due Diligence (DD) system under FSC-STD-40-005 (V3.1) EN REQUIREMENTS FOR SOURCING FSC® CONTROLLED WOOD - PART I DUE DILIGENCE SYSTEM.

The basis of the FIJI PINE GROUP Due diligence system is three elements: obtaining information, risk assessment, risk mitigation.

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FIJI PINE GROUP uses a risk assessment on this supply chain as part of their program for controlled wood sources under FSC-STD-40-005 (V3.1) EN. REQUIREMENTS FOR SOURCING FSC® CONTROLLED WOOD.

Since there is no approved National Risk assessment¹ or Centralized National Risk² assessment for Fiji –Fiji Pine Group use an Extended company risk assessment (ECRA): An organization’s assessment of the risk of sourcing from unacceptable sources in unassessed areas, developed according to FSC-PRO-60-002a FSC National Risk Assessment Framework and the standard FSC-STD-40-005 V3-1 Requirements for Sourcing FSC Controlled Wood.

The ECRA assess risks in the following areas:

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 or non-forest use; and
5. Wood from forests in which genetically modified trees are planted.

If Low risk cannot be determines a category called specified risk: defined as:

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

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

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

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

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

¹ National risk assessment (NRA): An assessment of the risk of sourcing from unacceptable sources in a given country/region, developed according to FSC-PRO-60-002 The Development and Approval of FSC National Risk Assessments. (Source: FSC-PRO-60-002 The Development and Approval of FSC National Risk Assessments)

² Centralized national risk assessment (CNRA): National risk assessment or part thereof developed by FSC International Center.

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Therefore risk mitigation is achieved by applying the guidance as control measures and monitoring the effectiveness of their implementation.

FIJI PINE GROUP also documents the risk of mixing material with non-eligible inputs in its supply chains during transport, processing, or storage.

Contents

- 1 FSC-PRO-60-002a Extended Company Risk Assessment Framework including for each supply source:
 - Supply location. Description of the nature of the supplying forestry operations, the supply area(s) and respective risk designation(s), List of suppliers.
- 2 Basis of the control measures and monitoring of the control measures.
 - 2.1 Control measures and
- 3 Mixing Risk Assessment.
- 4 Procedures for comments and complaints from stakeholders relating to the DDS.
6. Internal audit of the DDS

Appendix 1. Expert input and review

FIJI PINE GROUP EXTENDED COMPANY RISK ASSESSMENT OF WOOD SUPPLY

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

SUMMARY:

Risk designations in finalized Extended Company Risk Assessment Fiji Pine Groupi.

Indicator	Risk designation (including functional scale when relevant)
<u>Controlled wood category 1: Illegally harvested wood</u>	
1.1	Low risk
1.2	Low risk
1.3	Low risk
1.4	Low risk
1.5	Low risk
1.6	Low risk
1.7	Specified Risk. Low risk for Plantation.
1.8	Low risk
1.9	Specified risk (related to protection of environment)
1.10	Low risk
1.11	Low risk
1.12	Specified risk (relates to labour rights and discrimination)
1.13	Low risk

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1.14	Low risk
1.15	Low risk
1.16	Specified risk low risk for softwood plantation under license. (Relates to tax payments)
1.17	Specified Risk. (Relates to a Valid License to harvest).
1.18	Low risk
1.19	Low risk
1.20	Specified risk, Low risk for plantations
1.21	Low risk
<u>Controlled wood category 2: Wood harvested in violation of traditional and human rights</u>	
2.1	Low risk
2.2	Specified Risk
2.3	Low risk
<u>Controlled wood category 3: Wood from forests where high conservation values are threatened by management activities</u>	
3.0	Specified risk. Adequate information is not available to establish the risk for all HCV categories. This means that all section 3 is specified risk.
3.1	Specified risk
3.2	Specified risk
3.3	Specified risk
3.4	Specified risk
3.5	Specified risk
3.6	Specified risk
<u>Controlled wood category 4: Wood from forests being converted to plantations or non-forest use</u>	
4.1	Specified to Low Risk
<u>Controlled wood category 5: Wood from forests in which genetically modified trees are planted</u>	
5.1	Low Risk

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FOR THE FULL EXTENDED COMPANY RISK ASSESSMENT ([HTTPS://FIJIPINE.COM.FJ/WP-CONTENT/UPLOADS/2021/07/FIJI-PINE-GROUP- -FSC™-CONTROLLED-WOOD-EXTENDED-COMPANY-RISK-ASSESSMENT.PDF](https://fijipine.com.fj/wp-content/uploads/2021/07/fiji-pine-group--fsc™-controlled-wood-extended-company-risk-assessment.pdf))

1 Suppliers to Fiji Pine Group

Refer to updated database at Fiji Pine Limited GIS Database “FIJI PINE CONTROLLED WOOD MASTERSHEET”

2 Basis of the control measures and monitoring of the control measures

The basis of the control measures.

The third party wood suppliers are all contracted to for supply of soft wood trees according to an annual wood flow plan. Fiji Pine Group prepares the harvest plan and uses its own Harvest crews and does not use harvest contractors. Therefore Fiji Pine Group will manage the control measures themselves.

Control measures should specify outcomes or levels (i.e. thresholds) of performance that are measurable during an evaluation.

Since Fiji Pine Group own operation is certified to FSC™ for forest management the procedures and practices use to meet the control measures will be the same as are used in Fiji Pine Group own FSC™ certified estate. This is consistent with FSC-STD-40-005 (V3.1) EN 4.5 which says:

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

The measurable outcomes are therefore compliance to the relevant Indicators and verifiers in the approved certification body Forest Stewardship Standard for Fiji.

Ongoing monitoring of the control measures.

Since Fiji Pine Group use its own harvest crew for third party as it does for its own FSC™ certified forest management system FIJI PINE GROUP will monitor and verify that the control measures are undertaken in it harvest planning and harvest operations according to the requirements of the FSC™ Principles and Criteria.

FIJI PINE GROUP will regularly visit harvest coups and will monitor the control measures during those visits e.g. checking harvest records, harvest QA records, Harvest Diaries.

A record of these visits and the checks made will be kept by FIJI PINE GROUP as evidence of these control measures.

2.1 Control measures for non-certified suppliers and harvest contractors.

Fiji Pine Group prepares the harvest plan and uses its own harvest crews and does not use independent harvest contractors. Therefore Fiji Pine Group will manage the control measures themselves.

2.2 Control Measures

For areas where Specified risk has been determined the following Control Measures will apply.

<u>Indicators/ Verifiers</u>	<u>Functional Scale</u>	<u>Control Measures</u>	<u>Desired Outcomes</u>
<p>1.7 Income and Profit taxes</p> <p><i>What is the Legislation covering income and profit taxes related to profit derived from the sale of forest products and harvesting activities?</i></p> <p><i>NOTE: does not include other taxes generally applicable for companies and is not related to salary payments.</i></p>	<p>Geographical scale: Viti Levu & Vanua Levu,</p> <p>Functional Scale: Pine Plantation Forestry</p>	<p>Nil, Low risk.</p> <p>Fiji Revenue and Customs Authority looks after the compliance.</p> <p>Their Role is to:</p> <ul style="list-style-type: none"> • Collect taxes and duties on behalf of government; • Provide quality advice on tax and customs matter to all our stakeholders; • Facilitate trade and travel; 	<p>To have a conformed and complied system for the income and taxes within all aspects of operations.</p>

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		<ul style="list-style-type: none"> and • Protect the borders. <p>An FAO report notes:</p> <p>A REVIEW OF THE FOREST REVENUE SYSTEM AND TAXATION OF THE FORESTRY SECTOR IN FIJI Adrian Whiteman 2005.</p> <p>“On the whole, the procedures currently in place for monitoring production and collecting forest charges are excellent. However, it is debatable whether the Government recovers all of their administrative costs of implementing the system”</p> <p>There are concerns about non-payment of taxes, this is mainly focused on the native Logging sector.</p> <p>The threshold for low risk has not been met at the Geographical scale: Viti Levu & Vanua Levu, but is met at the Pine Plantation functional scale</p>	
<p>1.9 Protected sites and species.</p> <p><i>International, national, and sub-national treaties, laws, and regulations related to</i></p>	<p>Geographical scale: Republic of Fiji,</p> <p>Functional Scale: Pine Plantation Forestry</p>	<p>For Controlled wood from other landowners Fiji Pine Group must do the harvest planning and use their own harvest crew.</p> <p>Private Wood is purchased on a spot</p>	<p>To have a system and prior informed knowledge that outlines and protects the HCVF areas.</p> <p>There are no fragmentation and</p>

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<p><i>protected areas, allowable forest uses and activities, and/or rare, threatened, or endangered species, including their habitats and potential habitats. (3.2)</i></p>		<p>market basis. As part of this verification process 100% of private wood sales from all regions the owner or their agent completes a grower declaration to give a history of the plantation and any impacts on the environment that they are aware of.</p> <p>Fiji Pine Group must use the same HCV management system for controlled wood that they use for its own FSC™ certified plantations. This system must be independently audited as meeting FSC™ Forest management standards for Principle 9 HCV.</p> <p>Refer: The HCVF Management Plan for Fiji Pine Limited 2021</p> <p>Process Steps :</p> <p>Step 1 – Identifying HCVF sites When an unidentified high conservation v site is found in the Fiji Pine Forest Management Unit, there is an immediate sign-in of site captured as well as a new identification tag/label is prescribed to the site(Example: VI 62 –whereby VI signifies the Viti Levu Island on</p>	<p>exploration of the flora and fauna In the area of projects.</p>
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		<p>which it is found , or VA – is the reference label for Vanua Levu,the number is the numerical sequence given to the site).(WL – Signifies the woodlot stand)</p> <p>There is an immediate call to notify Wood Supply coordinators and Environment Unit Staff to carry out on-site assessment. A field demarcation is immediately carried out to quadrant off the site for protection purposes. GPS equipment is used to mark these sites with the GIS Department.</p> <p>Step 2 – Verification and Documentation of HCVF Sites A detailed site inspection report is carried out to compliment the identification of the new hcvf site. This is further completed in the creation of a seamless GIS layer of HCVF sites and updated accordingly with existing ones. A local expatriate/ consultant in ecology are independently hired for this assessment and verifications.</p> <p>Step 3 - Utilisation of Demarcated Areas The seamless GIS layer of the HCVF sites is further overlaid with operation maps(that is Wood Supply</p>	
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		<p>Harvesting Maps) on a daily basis by Planning Officers to use as precaution before and after operation to enable minimum/no exposure of disturbance to be done on and around the established site.</p> <p>Step 4 –Community Consultation After preparation of HCVF documents are done, an intensive community consultation is carried out to all resource stakeholders to inform and to educate about the existence of these sites in and around their locality, as well as collaboration in protective actions.</p> <p>Step 5 - Record Completed documentation of consultation is filed and kept for safe-keeping and given as and when required or requested.</p> <p>Review of the existing established sites and new sites are done on annually with updating of the map layers and records.</p> <p>Responsibility: All FPL staffs are to take on full responsibility of protection of these sites however, recording and establishment is done</p>	
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		by Environment and Research Department of FPL.	
<p>1.12 Legal employment</p> <p>Legal requirements for employment of personnel involved in harvesting activities including requirements for contracts and working permits, requirements for obligatory insurance, requirements for competence certificates and other training requirements, and payment of social and income taxes withheld by the employer. Also covered are the observance of minimum working age and minimum age for personnel involved in hazardous work, legislation against forced and compulsory labor, and discrimination and freedom of association. (3.5)</p>	<p>Geographical scale: Republic of Fiji,</p> <p>Functional Scale: Pine Plantation Forestry</p>	<p>Fiji Pine Group will use the same management system for controlled wood that they use for its own FSC™ certified plantations. This system must be independently audited as meeting FSC™ Forest management standards for Principle 2.</p> <p>Please refer to the companies “Equal Employment Opportunities Statement” endorsed by the company CEO mitigating this risk factor.</p> <p>Also attached in as Annex 2.</p>	<p>To be the employer of choice to provide the best working environment and conditions.</p>
<p>1.17 Trade and transport.</p> <p>All required trading and transport permits shall exist as well as legally required transport documents which</p>	<p>Geographical scale: Republic of Fiji,</p> <p>Functional Scale: Pine Plantation Forestry</p>	<p>Fiji Pine Group must use the same management system for controlled wood that they use for its own FSC™ certified plantations. This system must be independently audited as meeting FSC™ Forest management</p>	<p>To comply and conform with the laws of Land Transport Authority and be able to get legality of the logs.</p> <p>No mixing of certified and non-</p>

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<p>accompany the transport of wood from forest operations. (5.2)</p>		<p>standards.</p> <p>Valid License to harvest including approval of transport documents which accompany the transport of wood from forest operations – this is present on all FPL log carting trucks. This is a legal pass obtained through Forestry Department who authorizes logging operation in Fiji.</p> <p>FPL then uses its own log delivery docketts from Forest to the Mill – which can be inspected in any point in time. This is also to avoid the log theft.</p> <p>FSC 100% docketts are used for FPL plantations.</p> <p>Controlled/ Private woodlot docketts will be used for the non FSC™ certified logs.</p>	<p>certified logs.</p>
<p>Indicator 2.2 Labour rights are respected</p> <p>Including rights as specified in ILO Fundamental Principles and Rights at work. Are the social rights covered by the relevant legislation and enforced in</p>	<p>Geographical scale: Republic of Fiji,</p> <p>Functional Scale: Pine Plantation Forestry</p>	<p>Fiji Pine Group must use the same management system for controlled wood that they use for its own FSC™ certified plantations. This system must be independently audited as meeting FSC™ Forest management standards for Principle 2: Please refer to the companies “Equal Employment Opportunities</p>	<p>To be the employer of choice to provide the best working environment and conditions.</p>

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<p>the country or area concerned?</p>		<p>Statement” endorsed by the company CEO mitigating this risk factor.</p> <p>Also attached in as Annex 2.</p>	
<p>3.1 – 3.6 Specified risk for all HCV -Since in 3.0 we have determined that not enough data exists for some HCV classes (but not all) specified risk applies across the board for an HCV classes</p>	<p>Geographical scale: Republic of Fiji, Functional Scale: Pine Plantation Forestry</p>	<p>For Controlled wood from other landowners Fiji Pine Group must do the harvest planning and use their own harvest crew.</p> <p>Private Wood is purchased on a spot market basis. As part of this verification process 100% of private wood sales from all regions the owner or their agent completes a grower declaration to give a history of the plantation and any impacts on HCV that they are aware of.</p> <p>Fiji Pine Group will use the same HCV management system for controlled wood that they use for its own FSC™ certified plantations. This system must be independently audited as meeting FSC™ Forest management standards for Principle 9 HCV.</p> <p>The HCVF Management Plan for Fiji Pine Limited looks into the approach</p>	<p>To have a system and prior informed knowledge that outlines and protects the HCVF areas.</p> <p>There are no fragmentation and exploration of the flora and fauna In the area of projects.</p>

		<p>of nurturing and protecting essential natural forest ecosystem; conserving areas of high traditional and cultural significance and to reduce the risk of degradation and fragmentation.</p> <p>Given how plantation forest and its management has evolved over the years, current and existing forest conditions have diverged from natural pre-settlement condition, the proposed High Conservation Value Forest Management Plan, is in principal an ecological restoration program. However, this will be needed to be implemented to fully facilitate its impact in the long-term.</p> <p>FPL uses WWF toolkit to identify its HCVF spots in their plantation forest and since the plantation is on grasslands, there is very low ecological concentration spots, however, the traditional and cultural spots are in high concentrations throughout the estate.</p> <p><u>Stakeholders</u></p>	
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		<ul style="list-style-type: none"> ▪ Land owners ▪ Haulage contractors ▪ Freight carriers ▪ Local councils and road authorities ▪ Department of Forestry ▪ Department of Environment ▪ Itaukei Land Trust Board ▪ General Public <p><u>Primary Legislations:</u></p> <ul style="list-style-type: none"> ▪ Environment Management Act 2005 ▪ Environment Regulations 2007 ▪ Forest Decree 1992 ▪ Rivers and Streams Act 1985 ▪ Fiji Forest Harvesting Code of 	
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		<p>Practice 2nd Edition 2013</p> <ul style="list-style-type: none"> ▪ Fiji's Endangered and Protected Species Act 2002 <p><u>Supporting Legal Instruments/Documents:</u></p> <ul style="list-style-type: none"> ▪ National Sustainable Development Strategy ▪ National Environment Strategy, ▪ Fiji Biodiversity Strategy and Action Plan, ▪ National Forest Policy Statement ▪ Rural Land Use Policy ▪ CITES Manual for Fiji Islands CITES Authorities and Border Control Officers <p><u>Performance Objective:</u></p> <p>To provide specific management direction to ensure the ecological sustainability and economic viability</p>	
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		<p>of present resources.</p> <ul style="list-style-type: none"> ▪ Restoring forest structure and functions ▪ Restoring diversity of plant and animal habitats and communities ▪ Protection of indigenous cultural sites as well as natural ecosystems that serve as food source to local communities ▪ <p><u>Management Strategies:</u></p> <p>Performance objective will be achieved by the following:</p> <ul style="list-style-type: none"> ▪ Fiji Pine Limited HCVF Standard Operating Procedures of identification and field demarcation ▪ Selectively felling ▪ Conduct prescribed inventory of existing and new high conservation value 	
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		<p>forest areas within Fiji Pine estate forest resources</p> <ul style="list-style-type: none"> ▪ Provide periodical community consultation with resources owners <p>Tasks:</p> <ul style="list-style-type: none"> ▪ Awareness training to be included as part of work programme ▪ Management enforcement to be maintained ▪ Public and community awareness/participation ▪ Consistent liaison with Department of Forestry, Environment and other relevant stakeholders to consolidate standing/existing resources within Fiji Pine's lease boundaries 	
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		<p><u>Responsibility:</u></p> <p>Responsibility of Fiji Pine Ltd, under the Environment - Enforcement & Research Department</p> <p><u>Performance Indicators:</u></p> <ul style="list-style-type: none"> ▪ Regular inspections for any operations(of any nature) within Fiji Pine Lease Boundaries ▪ Harvest Schedules <p><u>Monitoring and Reporting:</u></p> <ul style="list-style-type: none"> ▪ Any complaints will be directed to Manager Environment, and copied to all Section Heads, Department of Environment as soon as possible ▪ Complaints and any actions arising from a complaint will be recorded in a Complaints Register to be maintained by site management. 	
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		<ul style="list-style-type: none"> ▪ Consistent Field visits to sites that require urgent attention <p>Corrective Actions:</p> <ul style="list-style-type: none"> ▪ Immediately address any complaints from public and civil community ▪ Maintain EM action system following proper procedural performance ▪ Identify, demarcate and protect all areas of HCV within Fiji Pine forests. <p>Please refer to FPL HCVF Procedure 2021</p>	
<p>4.1 Conversion of natural forests to plantations or non- forest use in the area under assessment is less than 0.02% or 5000 hectares average net annual loss for the past 5 years (whichever is less),</p> <p>OR</p> <p>Conversion is illegal at the national or regional level on public and private land</p>	<p>Geographical scale: Viti Levu & Vanua Levu,</p> <p>Functional Scale: Pine Plantation Forestry</p>	<p>Specified Risk – Low Risk for overplanted areas for FPL .</p> <ul style="list-style-type: none"> - FPL to check with the landowners on the background information on the pine land. <p>FPL to check with iTLTB or aerial maps from past if there were conversions done on natural forests for other purposes and later the area</p>	<p>To source logs from areas knowing the originality and background of the area.</p> <p>why FPL overplant areas are dealt with differently to other woodlots because the overplant areas were planted by FPL itself and FPL knows the history and origin of the trees and that it was not planted on any converted areas hence on</p>

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		was converted to Pine.	grasslands only. Whereas the other private woodlots planted by the land owners themselves – do not know the history of the areas and the plant origins.
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3 Mixing Risk Assessment

Mixing risk assessment for FSC™ controlled wood		Project / Work Description:	
Risk Assessment Team (Name/s): COC Administrator, Senior Manager Operations, Manager Operations, Site Supervisor, Financial Controllere		Approved By Supervisor / Reporting Officer: Kavita Nair	
Date Conducted:	Next Review Date:	Date: NA	

Step	Hazard Identification	Risk Evaluation and justification	Control Measures
Harvest	Taking wood from blocks that are not covered under the Due Diligence system.	Low Risk Only contracted wood is taken. All contracted wood from all suppliers are covered under the Due diligence system.	The wood supply system ensures that wood is fully traceable to a coup of origin and that these coups are covered by the DDS.
	Wood from outside the risk assessed area	Low Risk Wood is only taken from Contracted suppliers on the	The wood supply & delivery note system ensures that wood is fully traceable to a coup of origin and that these coups are covered by the DDS.

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		islands covered by the risk assessment.	
Transport	Mixing of non controlled wood in transit	Low risk Wood is only taken from Contracted suppliers and Fiji Pine Group manages all stages of transport to the Mill	<ol style="list-style-type: none"> 1. FSC 100% Logs are transported separately with a FSC 100% certified stamped delivery docket. 2. All wood will be under the controlled wood project for the company delivered through a private woodlot docket. 3. and Fiji Pine Group manages all stages of transport to the Mill
Transport	Mixing of non controlled wood in transit from TWPL to TWIL	Low risk Wood is only taken from contracted suppliers and Fiji Pine manages all stages of transport to the mill.	<ol style="list-style-type: none"> 1. FSC 100% logs are transported separately on the barge from TWPL to TWIL. 2. Controlled wood sawlogs are transported separately on a separate barge on controlled wood docket without FSC™ claims.
Milling and chipping	Mixing of non controlled wood at the mill	Low risk Wood at the Mill is either FSC™ wood or wood covered by the controlled wood due diligence system.	<ol style="list-style-type: none"> 1. All FSC™ certified logs will be on a separate log yard with a signboard of FSC 100%. 2. All controlled wood logs will be segregated with a signboard for controlled wood at the yard. 3. Wood at the Mill is either FSC™ wood or wood covered by the controlled wood due diligence system. The delivery record is fully traceable to the coup of Origin
Transport	Transportation from TWIL to Chip Yard	Low risk Woodchips are taken only by the TWIL owned trucks to transport chips from TWIL to the Chip Yard	Once the controlled wood certification gets through we will have FSC Mix% claims and there will not be a risk of mixing of materials.

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4 Procedures for comments and complaints from stakeholders relating to the Due Diligence System (DDS) & Extended Company Risk Assessment (ECRA)

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

4.1 Stakeholder identification: FIJI PINE GROUP has identified affected and interested stakeholders in relation to the forest management activities of their suppliers and the identified risk, including the stakeholder groups listed below (see section 4.7).

4.2 Stakeholder notification: Identified stakeholders will be invited to participate in the consultation at least six (6) weeks prior to the change to the DDS or related control measures that is the subject of the consultation. FIJI PINE GROUP Pty Ltd shall employ effective means to inform stakeholders, using culturally appropriate consultation techniques.

4.3 Stakeholder engagement techniques:

Techniques to reach out to stakeholders may include Face to face meetings, personal contacts by phone, email, or letter, notice published in the national and/or local press and on relevant websites, local radio announcements, or local customary notice boards.

4.4 Stakeholder consultation

All identified stakeholders are provided access to information that is relevant to the consulted issue no later than six (6) weeks prior to the change to the DDS that is the subject of the consultation. FIJI PINE GROUP Pty Ltd only excludes information that is considered confidential. In such cases a justification for the confidential nature of the information is presented to the FSC™ certification.

If there is a requirement to publish the comments stakeholders will be asked to provide their consent to the publication of their comments.

4.5 Stakeholder feedback

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

4.6 Consultation records:

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

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4.7 Content of the report

FIJI PINE GROUP will prepare a report of the consultation process, which includes:

- a) The areas for which the stakeholder consultation has been conducted (e.g. geo-reference data, state, province, supply unit);
- b) A list of the stakeholders groups invited by FIJI PINE GROUP Pty Ltd to participate in the consultation;
- c) A summary of the stakeholder comments received. These will not normally be published but if they are comments are only be published with prior consent from the consulted stakeholder and not associated with stakeholder names;
- d) A description of how FIJI PINE GROUP Pty Ltd has taken stakeholder comments into Account;
- e) The organization's justification for concluding that the material sourced from these areas can be used as controlled material or sold with the FSC™ Controlled Wood claim of the certification process, according to Section 6 of the controlled wood standard.

4.8 Stakeholders groups

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

- a) Forest owners and/or managers of large, medium and small forests, and high,
- b) Forest contractors (including loggers);
- c) Representatives of forest workers and forest industries;
- d) Certificate holders.
- e) NGOs involved or with an interest in social aspects of forest management and other related operations; Forest workers;
- f) International, national and local trade/labour unions;
- g) Representatives of local communities involved or with an interest in forest management, including those relevant for HCVs 5 and 6;
- h) Representatives of Indigenous Peoples and/or traditional peoples (if present and/or holding rights), including those relevant for HCVs 5 and 6;
- i) Representatives of recreational interests.
- j) NGOs involved or with an interest in the environmental aspects of forest management. Consultation should target the following areas of interest and expertise: Biological diversity, Water and soil, HCVs 1-4
- k) Local communities and Indigenous Peoples' representatives (HCVs 5 and 6)
- l) FSC™-accredited certification bodies active in the country
- m) National and state forest agencies
- n) Experts with expertise in controlled wood categories
- o) Research institutions and universities

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p) FSC Australia

1. Internal audit of the DDS

The FIJI PINE GROUP LTD DDS is internally audited at least annually to ensure that it is being implemented correctly. The scope, dates, and staff involved in internal are recorded on the records of internal audits.

Where the DDS is evaluated as ineffective during the internal audit all relevant issues are Addressed and corrected within 12 months of their detection.

Scope: Annual review of the Due Diligence system for Fiji Pine Group Ltd .

Date: TBC

Staff Involved:

1. FSC™ Administrator,
2. COC Administrator,
3. Senior Manager Operations,
4. Manager Operations,
5. Site Supervisor,
6. Financial Controller,
7. Environment, Enforcement & Research Manager and
8. Manager GIS & Technical.

APPENDIX 1

Expert review and input

Expert Used and Qualifications	Expert Input
<p>Kevin OGrady – Kevin OGrady is Managing Director of Pinnacle Quality and works in a range of sustainability standards including FSC™ and the Alliance for water stewardship.</p> <p>Kevin OGrady was a member of the FSC™ International controlled wood technical committee who developed the FSC™ controlled wood standards – current version now FSC-STD-40-005 (V3.1) EN REQUIREMENTS FOR SOURCING FSC® CONTROLLED WOOD.</p> <p>Kevin OGrady was chairman of FSC Australia and initial chair of the FSC Australia Controlled Wood National Risk assessment committee who developed the world’s first FSC Controlled Wood National Risk assessment in 2014.</p> <p>Under the new framework, FSC-PRO-60-002a FSC National Risk Assessment Framework, Kevin OGrady was on the committee who developed the updated National Risk Assessment for Australia and was a consultant on the Centralized National Risk assessment developed for New Zealand</p>	<p>Develop and draft the Extended National Risk assessment and Due Diligence system for Fiji Pine Group Ltd.</p>
<p>Sean Cadman – Sean Cadman was a member of the FSC International controlled wood technical committee who developed the FSC controlled wood standards – current version now FSC-STD-40-005 (V3.1) EN REQUIREMENTS FOR SOURCING FSC® CONTROLLED WOOD.</p> <p>Sean was chairman of FSC Australia involved in developing the FSC Australia Controlled Wood National Risk assessment which was the world’s first FSC Controlled Wood National Risk assessment in 2014.</p> <p>Under the new framework, FSC-PRO-60-002a FSC National Risk Assessment Framework, Sean Cadman was on the committee who developed the updated National Risk Assessment for Australia.</p>	<p>Peer review of the draft and gap assessment against FSC-PRO-60-002a FSC National Risk Assessment.</p>

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Sean is an elected member of the FSC™ Policy and Standards Committee whose role it is to review and approve FSC National Standards around the world.	
Vaughan OGrady – Editor. Vaughan OGrady is a freelance editor based in London. UK. He has a long work history editing technical journals for general markets in Africa, South East Asia and the Middle East. He specializes in summarizing long technical documents for a non-specialist audience.	Editor and developed of the Plain Language version of the Extended Company Risk assessment as the basis for stakeholder consultation.
Ms Sanjana Lal - Conservator of Forests - Ministry of Forest	<p>Confirmed compliance with local Laws relating to forestry.</p> <p>Ms Lal confirmed compliance to local laws for HCV 1 and 3. This also covered 1.9 Protected sites and species. The confirmation was in compliance with the local laws relating to forestry.</p>
Ms. Slanaieta Matai -.Lecturer Fiji National University.	<p>Environmental and Social impact assessments. HCVF assessment and developing HCV plans including annual revision of plans or reports if needed.</p> <p>Ms Matia developed social and environmental impact assessments used as part of the HVC1 and 3 management plan for Fiji Pine. She was also part of the annual revision of plans</p>

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	<p>Ms. Matai advised on specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes.</p>
<p>Mr. Ilaitia Finau Technical Consultant with Ms Salanieta Matai</p>	<p>Environmental law advice</p> <p>Mr Finau provide environmental law advice for HCV 1 and 3. This also covered 1.9 Protected sites and species.</p> <p>Mr. Finau worked for Department of Environment of Fiji and he confirmed our procedures for getting the approval from the Ministry for logging in these areas of woodlots.</p>
<p>Mr. George Vuki (former General Manager Operations for Fiji Pine) now is the Director for Forestry Department - Ministry of Forests. Part of developing SRC energy wood plantations to supply biomass to a wood fired power plant (12MW) for supply to Fiji's power grid. Part of a project to determine the area of the invasive African tulips in the Nadroumai area near Sigatoka using GIS and field reconnaissance survey.</p>	<p>Development of operation under FSC™ system for Fiji Pine</p> <p>Mr. George Vuki work contributed to management of threats to HCV 3.</p> <p>Mr Vuki is on eof the pioneers for the steering committee of the Fijis</p>

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	<p>Standard for Certificatiin and he confirms our operations and procedures in this new venture for controlled wood certification.</p>
<p>Mr Solomoni Nata (Former Deputy General Manager Operations for iTLTB) now manages his own company as a consultant for social projects relating to Indigenous people’s rights.</p>	<p>Development of the Indigenous peoples rights for the certification purposes.</p> <p>Mr. Nata contributed to the social attributes of the papers on the rights of indigenous people in regarding the new Bill No.17.</p> <p>He clarified that the new Bill does not revoke any rights to the land for the landowners – however it protects them further to get in timely payments for the lease lands.</p>

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Annex 1

Task	Complaints Procedure – Due Diligence System
Description:	Fiji Pine Group has developed and implemented this documented procedure to handle comments and complaints from stakeholders that are related to the DDS.
Process Steps : Step 1 – Acknowledging receipt of complaints <ol style="list-style-type: none">1. Complaints can be sent in through email, website feedback and or through phone call.2. Contact: ashiana.hassan@tropik.com.fj / Ph: 99931143. Acknowledge email in written form via email or letter. Step 2 – Informing Stakeholders <ol style="list-style-type: none">1. The FSC™ Administrator inform stakeholders of the complaints procedure and provide an initial response to the complaints within a time period of 2 weeks.2. Forwarding complaints related to risk designations in the Extended Company Risk Assessment and to SCS Global (certifying body) Step 3 - Feedback <p>The company to then inform the complainant, the certification body (SCS) of the results of the complaint and any action taken towards its resolution and correspondences.</p> Step 4 - Record <p>Completed documentation of complaints is filed and produced as and when required or requested.</p> Step 5 - Responsibility <p>FSC™ Administrator is responsible for complaints and records in regards to DDS and Extended Company risk Assesment (ECRA).</p>	

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Annex 2



HEAD OFFICE & DRASA SAWMILL COMPLEX
Vakabuli Village Road, Drasa, Lautoka
Private Mail Bag, Lautoka, Fiji

Phone: (679) 6661388
Email: info@tropik.com.fj

EQUAL EMPLOYMENT OPPORTUNITY (EEO) STATEMENT

(Employment Relations Act, 2007)

Fiji Pine Group (FPG) of Companies is committed to a policy of giving equal employment opportunities to all employees and other potential applicants in relation to their recruitment, promotion, transfer, remuneration and conditions of employment, training, working environment, termination and redundancy throughout the course of their employment with the Company. Decisions for all recruitment, selection and determination of promotion will be based on merit and merit alone.

In compliance to Section 75 of the ERA 2007, FPG will treat everyone equally, irrespective of gender, marital status, age, disability, race, colour, ethnic or national origin, religion, political beliefs or membership or non-membership of a Trade Union and places an obligation upon all employees to respect and act in accordance with this policy statement. FPG is committed to providing training for all its employees in applying EEO practices.


FPG is committed to ensuring that all work together collaboratively, understand and adhere to the rules required to achieve this professional standard of workplace relations. In complying with the ERA 2007, FPG values every employee, communities, landowners, customers, clients and contractors. We respect human rights. We respect all FPG employees and their different cultures. We believe that all people are entitled to be treated with compassion, respect, dignity and courtesy.

Workers have the right to fair employment practices including the right to join a trade union in accordance with ERA 2007. We practice Good Faith Collective Bargaining process as per the section 149 of ERA 2007 having long term business sustainability as one of the key considerations. A sustainable business protects jobs and the future of our generations.

Our policy is in accordance with ERA 2007 and other relevant legislations as governed by Fijian Laws.

The above policy statement confirms for the following FSC™ Core Labor Requirements:

1. abolition of child labour,
2. elimination of all forms of forced labour,
3. elimination of discrimination in employment and occupation, and,
4. respect for the freedom and right of workers to associate and the effective recognition of the right to collective bargaining.


Vimlesh Kumar
Chief Executive Officer


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