

Public Summary of Reliance Forest Fibre (RFF)

Due Diligence System – 2023

RFF is required to provide to their certification body a written summary of their due diligence system (DDS) with the following information:

Description of Supply Area: RFF has sourced and will continue to source hardwood plantation logs directly from various forest managers in Tasmania including from RFFs own estate and managed properties.

Risk Designation: LOW risk for Tasmania-controlled wood categories 1, 2, 5 and SPECIFIED risk for category 3 where high conservation values are threatened by management activities and category 4 where native forests are being converted to plantations or non-forest use.

Applicable Risk Assessment: Australia has one risk assessment referred to as National Risk Assessment FSC-NRA-AU V2-0. This is available through the FSC Australia website.

RFF Risk Assessment: – RFF are required to assess the risk of non-eligible inputs entering the supply chain during transport, processing or storage. Table 1 illustrates the risk assessment process in the supply chains, the level of risk, and the risk control measures in place.

Table 1- Mixing risk assessment

Process	Risk	Risk Mitigation Measures	Evidence
Transport of logs directly from the forest (all suppliers)	LOW	<ul style="list-style-type: none"> Plantation loads delivered to Bell Bay are transported directly from the forest and hauled to the facility. Every harvest operation is authorised by RFF through the notification or issuance of an Operation Number. This identifies the contractors, the coupe, and the certification status (if any). Each harvest operation must have an approved Forest Practices Plan (FPP). This will identify if any conversion is taking place and confirmed HCV 4 and HCV 6. Certified suppliers to AS4708 or a field audit for confirmed HCV 4 or HCV 6 minimum once per supplier. 	Delivery documentation with the required information. FPPs and supporting documentation. Compliance reports completed by a Forest Practices Officer. Valid AS4708 certificates. Field audits on properties with HCV 4/HCV 6 and supplier not certified.
Transport and storage of Logs via rail by TasRail	LOW	<ul style="list-style-type: none"> Some logs are transported by rail for a portion of the transport from the forest to Bell Bay. RFF has a services/outsourcing agreement with Tasrail for the unloading, loading and delivery of logs to the BBCT facility - Bell Bay. At all times logs destined for RFF will be kept separate from all other logs being handled in the Tasrail log yard by Tasrail. RFF will supply Tasrail with updated coupe and operation numbers details as they are authorised. The Loader Operator who unloads trucks once they enter the rail facility, 	Delivery documentation, dockets, loaderman sheets and rail manifest. Tasrail log yard management system. RFF's <i>Procedure for Receiving Deliveries by RAIL</i> FSC <i>Field Verification Audit</i>

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		<p>checks that the delivery documentation contains an active Operations Number.</p> <ul style="list-style-type: none"> RFF’s <i>Procedure for Receiving Deliveries by RAIL</i> details the material receipt and storage process, including the process to follow if the material cannot be verified. Loader operator will maintain a Loaders record of all loads unloaded at the Tasrail yard. Tasrail will supply a copy the loaders record to RFF upon request. RFF reconciles the LOGr report and Tasrail lweigh report to ensure loads details are correct. A manifest of logs loaded onto the train will be drawn by Tasrail and supplied prior or at the time of the rail deliveries into RFF Bell Bay. Additional control – annual outsourcing inspection audit 	<i>Outsourcing Premises</i> audit form
Entry to the Bell Bay facility	LOW	<ul style="list-style-type: none"> The Loader Operator who unloads trucks once they enter the facility, checks that the delivery documentation contains an active Operations Number. Dallas Tag – QR code from LOGR Docket Truck driver goes to Truck Observation box – QR code scanned at drop off point Driver then tares off with Dallas Tag RFF’s <i>Procedure for Receiving Deliveries by RAIL</i> details the material receipt and storage process, including the process to follow if the material cannot be verified. 	<p>Delivery documentation with the required information.</p> <p>Cross-checking weighbridge data with Logr and hard copies.</p>
Processing and storage at the Bell Bay facility	LOW	<ul style="list-style-type: none"> secure facility – unauthorised entry restricted. material that cannot be verified is unloaded in a segregated area until the identification of the origin can be established. 	RFF’s <i>Procedure for Receiving Deliveries by RAIL and TRUCK</i>

Procedure for Filing Complaints: complaints regarding RFF’s due diligence system can be made to Heath Blair – RFF’s Forest Operations Manager at admin@relianceff.com.au .

Stakeholders shall include as much information regarding the complaint so that RFF can assess and respond. All complaints are handled under RFF’s *Complaints Handling Procedure*, which is available upon request and provided to a Complainant.

Control Measures: As Tasmania has specified risk for the origin of material in relation to controlled wood categories 3.4, 3.6 and 4, RFF must implement risk mitigation measures. Table 2 is a summary of the control measures by risk assessment indicator.

Table 2 Risk Mitigation Measures and Desired Outcome

Risk Assessment indicator	Control Measure in Place	Desired Outcome
3.4 HCV 4	<ol style="list-style-type: none"> 1. Examine the FPP for confirmed HCV4. 2. Certified suppliers to AS4807. 3. Field audits for non-certified suppliers and confirmed HCV 4. 4. Stakeholder consultation 	<ol style="list-style-type: none"> 1. HCV 4 is identified and mapped on the FPP. 2. Certified suppliers are already implanting systems to ensure HCV 4 is protected. 3. Field audits confirm that prescriptions to manage HCV 4 are implemented.
3.6 HCV 6	<ol style="list-style-type: none"> 1. Certified FFPs identify registered cultural heritage. 2. Certified suppliers to AS4807. 3. Field audits for non-certified suppliers and confirmed HCV 6. 4. Stakeholder consultation 	<ol style="list-style-type: none"> 1. HCV 6 is identified and mapped/identified on the FPP and in the field. 2. Certified suppliers are already implanting systems to ensure HCV 6 is protected. 3. Field audits confirm that prescriptions to manage HCV 6 are implemented.
4.1	<ol style="list-style-type: none"> 1. Certified FPP. 2. Note included in Suppliers Letter that remnant vegetation is not to be harvested. 	<ol style="list-style-type: none"> 1. The certified FPP confirms material is from a plantation and that no conversion is planned.

Expert Engagement:

The Controlled Wood National Risk Assessment (NRA) specified in FSC-NRA-AU V2.0 is used to develop appropriate and mandatory control measures as shown in Section 4.4 to maintain identified values threatened by forestry operations. The risk assessment was developed by experts who meet the definition and requirement of experts in FSC-STD-40-005 Annex C.

RFF are implementing the mandatory control measures as required in the HCV Evaluation Framework. The Forest Practices Code identifies appropriate management control measures for HVC 4 and HVC 6.

Should RFF use new control measures, these must be assessed by an expert who meets the requirements of Annex C.

RFF also use experts in the assessment of HCVs in the preparation of the FPP.

RFF engages and seeks the advice of relevant experts, which are as follows:

- Specialist from Forest Practice Authority (FPA) provides recommendations for managing values threatened by forestry operations.
- Forest Practices Officer (Planning) to assess the adequacy of the RFF Operation Request Form and check certified FPP for adequate control measures for threatened values of HCV 4 & HCV 6.
- Trained RFF staff to identify and appropriately manage High Conservation Values.

Verification Audits:

RFF is not required to do field verification audits as per the new NRA unless indicators 3.4 HCV 4 and 3.6 HCV 6 are assessed at the Operation Number Request process of reviewing the FPP indicates that control measure/s as specified in table 2 is/are required.

No verification audits were required during the current audit period.

Stakeholder Consultation

RFF has engaged with stakeholders on the assessment process and the control measures in place to mitigate the risk of material entering the chain of custody that come from the five Unacceptable Material Controlled Wood Elements entering the FSC system. The consultation is being carried out following Annex B of FSC-STD-40-005 V3-1. Feedback will be provided to participating stakeholders within 60 days of the end of the consultation period. A process of stakeholder mapping was undertaken as part of the 2023 engagement process with the stakeholder register being updated from this process. The Stakeholder register has been used to contact and identify stakeholders for consultation in 2024.

Stakeholder Groups in Tasmania invited to participate in the consultation process included:

Economic Interests

- Forest Owners / Managers;
- Representatives of forest workers and forest industries; and
- FSC Certificate Holders.

Social Interests

- NGOs involved or with interest in social aspects of forest management and other related operations;
- International, national and local trade / labour unions;
- Representatives of local communities involved or with an interest in forest management, including those relevant for HCVs 5 and 6;
- Representatives of Indigenous Peoples and/or traditional peoples (if present and/or holding rights), including those relevant for HCVs 5 and 6; and

Environmental Interests

- NGOs involved or with an interest in the environmental aspects of forest management:
- FSC-accredited Certification Bodies Active in the Country
- National and State Forest Agencies
- Representatives of Forest Workers and Forest Industries
- FSC Regional Offices

Input received from stakeholders in 2023 included one email from a stakeholder who had reviewed the DDS and was pleased it met all requirements. They also suggested we remain vigilant in protecting Swift Parrots, which RFF will always do, but a reminder is always welcome.

As a result of this input, RFF is confident that the material sourced from these areas can continue to be used as controlled material or sold with the FSC Controlled Wood claim.