

Opal Maryvale Mill’s Due Diligence System

According to FSC-STD-40-005 (V3.1). REQUIREMENTS FOR SOURCING FSC® CONTROLLED WOOD.

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1. Introduction

1.1. Purpose

To establish, maintain and implement Maryvale mill's non-FSC certified fibre supplier evaluation and approval procedures to achieve compliance with Forest Stewardship Council® (FSC®) Controlled Wood (CW) requirements. This is to ensure that only controlled materials are procured and used for the manufacture and/or sale of certified products, and that due diligence is conducted prior to the sale of non-certified products.

Opal has documented procedures covering all applicable requirements of this standard either in this document or in the relevant part of the company's Quality Management System (QMS) as referenced throughout the document.

1.2. Scope

Supply for Opal Australian Paper (OAP)'s trades in paper products comes from a variety of plantation sources in Victoria, Australia. Some are local FSC certified, and some are local controlled material from private woodlot sources. All wood sourced is plantation grown species from plantation sources in Australia.

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.

The verification of origin of materials, including:

- Maryvale Mill's procurement of wood and chips, from non-FSC certified suppliers
- Collection of fibre supplier information
- Evaluation of suppliers and their raw material supply
- Approval and listing on a centralised Fibre Suppliers Register
- FSC-STD-40-004_V3-1 Chain of Custody Standard
- FSC-STD-40-005 V3-1 Requirements for Sourcing FSC Controlled Wood
- FSC-NRA-AU_V2-0 FSC National Risk Assessment for Australia
- FSC_NRA-AU_HCV_AF_V2-0 High Conservation Values Evaluation Framework

1.3. Responsibility

Opal's CoC Management Representative is the management representative responsible for the organization's conformity with all applicable requirements of this standard.

The following positions have specific responsibilities for elements of the Controlled Wood Procedure and due diligence system.

Table 1: Responsibilities

System element	Responsible position
Overall maintenance of system	Head office: Sustainability Manager Maryvale: Business Systems Manager
Training and competency development	Head office: Sustainability Manager Maryvale: Business Systems Manager
Maintenance of documents and procedures	Head office: Sustainability Manager Maryvale: Business Systems Manager
Maintenance of supply chain information	Maryvale: Category Manager

Risk assessment	Maryvale: Category Manager
Risk mitigation	Maryvale: Category Manager
Maintenance of records	Head office: Sustainability Manager Maryvale: Business Systems Manager and Category Manager

2. Due Diligence System

This document outlines the Due Diligence System (DDS) under FSC-STD-40-005 (V3.1) Requirements for Sourcing FSC Controlled Wood – Part 1 Due Diligence System. The processes below should be followed to assess all non-FSC certified fibre suppliers and supplies that are to be used for FSC-certified output products.

The Due Diligence System is utilised for purpose of evaluation, analysis and recording of decisions, which must be completed BEFORE the supplier is approved and BEFORE any purchases are initiated.

The basis of the Opal Australian Paper’s Maryvale mill due diligence system is three elements:

1. obtaining information,
2. risk assessment,
3. risk mitigation.

Maryvale mill uses a risk assessment on its supply chain as part of its program for controlled wood sources under FSC-STD-40-005 (V3.1) Requirements for Sourcing FSC Controlled Wood.

National Risk Assessment for AUSTRALIA FSC-NRA-AU V2-0 is the National Risk¹ assessment for Australia. They 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.

There are two aspects of the risk assessment:

1. Risk at Origin level (3.1-3.3)
2. Risk at Supply Chain level (3.4)

If low risk is established through risk assessments on the supply area and the supply chain, then the material can be used as controlled material and/or FSC Controlled Wood.

If Low risk cannot be determined 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)

2.1.1. Summary of Risk Indicators

Controlled wood categories 1, 2 and 5 are low risk in the supply areas of Victoria:

- Controlled wood category 1 - illegally harvested wood;
- Controlled wood category 2 - wood harvested in violation of traditional and civil rights; and
- Controlled wood category 5 - wood from forests in which genetically modified trees are planted.

Controlled wood categories 3 and 4 are specified risk in the supply areas of Victoria:

- Controlled wood Category 3 - wood harvested from forests in which high conservation values are threatened by management activities (3.4 – Critical ecosystem services & 3.6 – Cultural values); and
- Controlled wood category 4 - wood from forests being converted to plantations or non-forest use.

Under FSC-STD-40-005 (V3.1) 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.*"

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

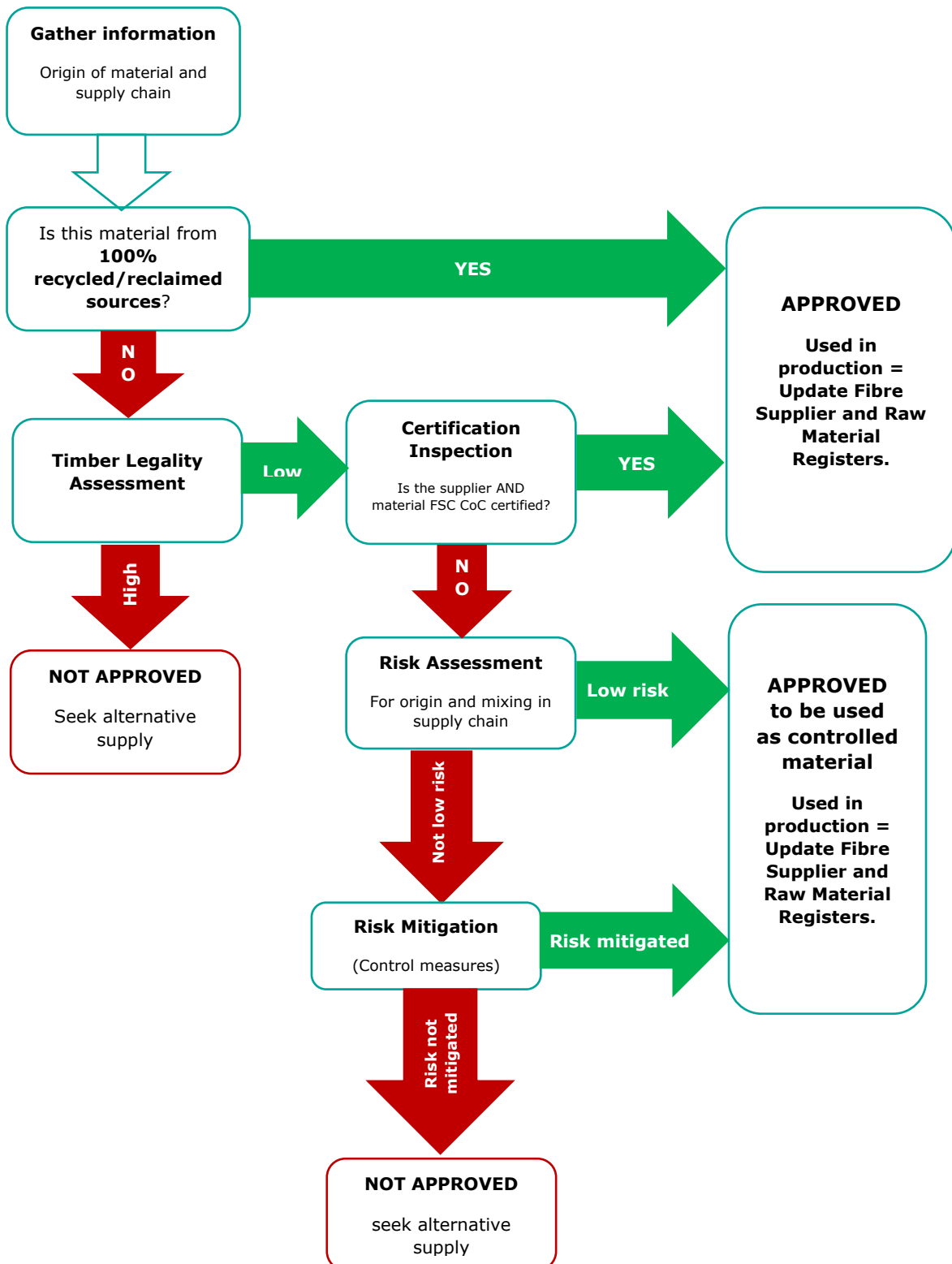
OAP Maryvale also documents the risk of mixing material with non-eligible inputs in its supply chains during transport, processing, or storage.

Suppliers are reviewed at least annually if Opal determines that a significant change in risk indicators or a change in the initial information gathered has occurred. Significant changes to risk indicators would include, but not be limited to, the following:

- Change of ownership;
- Change in operations;
- Change in the fibre supplies;
- Media publications identifying issues with fibre suppliers and supplies used by Opal.

2.2. Process Flow

The process flow below is specifically for Maryvale mill's FSC inputs only.



2.3. Risk assessment at origin

2.3.1. Information gathering

Information gathering is used as the first step of the Due Diligence System. Information gathering methods as determined by the OAP representative responsible for the management of the supplier may include (but not limited to):

- **Fibre Supplier – Raw Material Questionnaire (Doc ID: 109)** sent to potential fibre suppliers (certified or otherwise), completed and returned with any supporting documentation to the Opal representative responsible for the management of the supplier.
- Email, websites, quotations or certifications.

OAP representatives are responsible for managing the questionnaire and/or information collected, risk assessment and records.

Information collected in the **Fibre Supplier – Raw Material Questionnaire (Doc ID: 109)** will determine if:

- a) The material is from 100% recycled or reclaimed sources (more information below), and approved for use in production/trade; **or**
- b) The material has virgin content, and more information is required to proceed to the **Fibre Supplier Inspection and Risk Assessment (Doc ID: 83)**.

At a minimum, Maryvale mill will request its supplier to provide information regarding the origin of material, such as:

- i. Name and addresses of suppliers.
- ii. Evidence of origin according to clause 2.2
- iii. Information supply chains according to clause 2.3
- iv. Description, quantity (in weight or volume), species of material (scientific and common name)
- v. Purchase documents – proof of purchase, transport documents from the supply unit.
- vi. Country of harvest, where legally required,
- vii. Hectares of area harvested.

2.3.2. Risk assessment of wood supply

Opal has used Australia's FSC [National Risk Assessment](#) (NRA)² to assess the risk of a material at its origin. According to FSC-PRO-60-002a FSC National Risk Assessment Framework for each supply source:

Note: all suppliers and their materials are applicable to table 2.

² Current NRA is valid till August 2026

Table 2: Risk Assessment at Origin as per NRA

Summary of Risks Indicator	Risk designation (including functional scale when relevant)
Controlled wood category 1: Illegally harvested wood	
1.1	Low risk
1.2	Low risk
1.3	Specified Risk: Northern Territory Low risk: all other States and Australian Capital Territory
1.4	Specified Risk: Australian Sandalwood (<i>Santalum spicatum</i>) Low risk: All other species
1.5	Low Risk
1.6	Low risk
1.7	Low risk
1.8	Low risk
1.9	Low risk
1.10	Low risk
1.11	Low risk
1.12	Low risk
1.13	Low risk
1.14	Low risk
1.15	Low risk
1.16	Low risk
1.17	Low risk
1.18	Low risk
1.19	Specified risk: Australian Sandalwood (<i>Santalum spicatum</i>) Low risk: All other species
1.20	Low risk
1.21	Low risk
Controlled wood category 2: Wood harvested in violation of traditional and human rights	
2.1	Low risk
2.2	Low risk
2.3	Low risk
Controlled wood category 3: Wood from forests where high conservation values are threatened by management activities	
3.0	Low risk
3.1	Specified risk – native forests in NSW, QLD, WA, Vic, Tas Specified risk – hardwood plantations in NSW & QLD Low risk – native forests in SA, NT, and ACT Low risk – hardwood plantations in SA, NT, WA, Vic, Tas, ACT Low risk – all softwood plantations
3.2	Specified risk – native forests in NSW, QLD, NT, WA, Vic, Tas Low risk – native forest in SA and ACT Low risk – all plantations
3.3	3.3 Specified risk – native forests in NSW, QLD, NT, WA, Vic, Tas
3.4	Specified risk

3.5	Low risk
3.6	Specified risk
Controlled wood category 4: Wood from forests being converted to plantations or non-forest use	Specified risk: New South Wales, Victoria, Queensland, South Australia, Western Australia, Tasmania, Northern Territory Low risk: Australian Capital Territory
Controlled wood category 5: Wood from forests in which genetically modified trees are planted	Low risk

2.4. Basis of control measures and monitoring

The basis of the control measures

The wood suppliers are all contracted to supply wood/logs according to an annual wood flow plan. HVP prepares the harvest plan and uses its own harvest crews or contractors under HVP control³. Therefore, HVP will manage the control measures themselves as part of their FSC certified system.

Risk Mitigation for Category 4 - Conversion

Organisations must not accept material into their supply chain that has originated from areas where the area is being converted to plantations or other non-forest use. It does not include plantation material from areas being reverted back to agriculture. Organisations must demonstrate that no conversion wood is entering their supply chain through field inspections and/or document verification.

Ongoing monitoring of the control measures

Since HVP use contracted harvest crew for third party wood as it does for its own FSC certified forest management system, HVP 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.

OAP Maryvale will review 100% of harvest planning documentation for Private coupes in the wood flow plan. Verification visits will be undertaken based on risks identified in the harvest management plan. The verification process is recorded in OAP FSC Controlled Wood verification audit report. (Doc ID: 501)

A record of these visits and the checks made will be kept by OAP Maryvale as evidence of these control measures.

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

AKD – Yarram site currently supplies softwood chips as a mixture of Certified wood from HVP Estate and non-certified wood from HVP Private and AKD Private.

AKD is progressing towards including Yarram site in their Multi-site Controlled Wood certification. This is expected to be completed by October 2024.

AKD only accepts plantation grown material that was established on cleared agricultural land. The Timber Harvest Plan (THP) identifies the plantation type and if conversion of native trees is taking place. AKD can demonstrate through document verification and a clearly identifiable species (*Pinus radiata*) that no conversion material is entering the facility.

HVP Harvest contractors are controlled by HVP and will be included in the monitoring program by OAP Maryvale.

³ HVP Procedure High Conservation Values Management System

2.4.2. Control measures for certified suppliers

For areas where specified risks have been determined, the following control measures will apply:

Controlled wood category 3: Wood from forests where high conservation values are threatened by management activities control measures by HVP are based on Mandatory - Use of the Australia HCV Assessment Framework for all sub categories <https://anz.fsc.org/controlled-wood/australian-national-risk-assessment>

Table 3: HVP Management of High Conservation Values, Source HVP HIGH CONSERVATION VALUES MANAGEMENT SYSTEM V1 June 2022

FSC HCV Category HVP FSS BMPs, Procedures, Operating Standards	FSC HCV sub-elements	Value identified within FMU
<u>HCV 1 Species diversity</u> RATSAC register. Procedure for Management of Rare and Threatened Species and Communities Species level Operating Standards and Management field guides Koala management plan Gippsland Giant Earthworm management plan Rainforest management procedure	1.1 Rare or threatened species	Yes
	1.2 Centres of endemism	Yes
	1.3 Poorly reserved rare species	Yes
	1.4 Seasonal concentrations of species	Yes
	1.5 High species/community diversity	Likely
	1.6 Refugia	Yes
<u>HCV 2 Landscape level ecosystems and mosaics</u> Cores and Links Native Vegetation Management procedure Mapped Ecological Vegetation Classes	2.1 Landscape level native forests	No
	2.2 Regionally significant forests	Yes
	2.3 Regionally significant habitat connectivity	Yes
	2.4 Intact Forest landscapes	No
<u>HCV 3 Ecosystems and habitats. Rare, threatened, or endangered ecosystems, habitats or refugia</u>	3.1 Threatened or depleted ecosystem habitats	Yes

Native Vegetation Management procedure Rainforest management procedure Koala management plan	3.2 Conservation of genetically distinct populations	Yes
	3.3 Old growth forest	Yes
	3.4 Remnant vegetation in heavily cleared landscapes and mature forest in degraded landscapes	Yes
<u>HCV 4 Critical ecosystem services</u> Code of Practice – streamside buffers, stream ID Procedure for Management of Sensitive Waterways Soil assessment procedure	4.1 Protection from flooding	No
	4.2 Protection from erosion	Yes
	4.3 Barriers to the spread of destructive fires.	Yes
	4.4 Clean water catchments	Yes
<u>HCV 5 Forest areas fundamental to meeting basic needs of local communities</u> Not Applicable	5.1 Water for daily uses	No
	5.2 Water for the irrigation of subsistence food crops	No
	5.3 Food and medicines fundamental for local traditional Indigenous uses	No
<u>HCV 6 Cultural values</u> First Peoples Cultural Heritage Protection procedure Natural and Non-indigenous Heritage Management procedure Code of Practice	6.1 Aesthetic values	No
	6.2 Historic values of global or national cultural or archaeological significance	Yes
	6.3 Long term research sites	No
	6.4 Social (including economic) values	No
	6.5 Spiritual and cultural values	Yes

2.5. Risk assessment of mixing in supply chain

2.5.1. Obtaining information

The required information for supply chain is:

- i. Map of supply chain to identify each stage involved in transferring the material between companies (e.g., transport, storage) and within a company (e.g., production process)
- ii. Transport documents, proof of purchase from supply unit origin. Documents needs to be provided for every link in the chain.

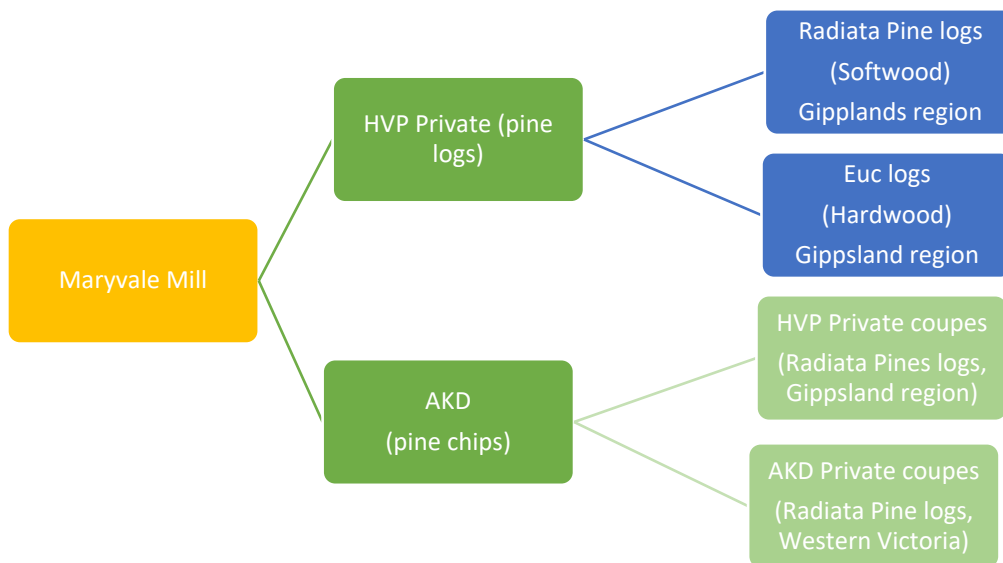


Figure 3: Supply chain map of non-FSC certified materials at Maryvale mill

2.5.2. Risk Assessment and Evaluation

Based on the information gathered, Opal will assess the risk and assign risk rating for each step in the supply chain. The risk conclusions must be objective, credible, realistic, and backed by appropriate documentation.

Please check **Doc ID: 83 Fibre Supplier Inspection and Risk Assessment**.

Table 4: Supply Chain Risk Assessment for HVP Logs

Step	Hazard Identification	Risk Evaluation and justification	Risk rating
Harvest	Taking wood from blocks that are not covered under the Due Diligence system.	All logs are covered under the HVP electronic delivery note system that can trace all log deliveries to the coup of origin.	Low risk
	Wood from outside the risk assessed area	All logs are covered under the HVP electronic delivery note system that can trace all log deliveries to the coup of origin.	Low risk
Transport	Mixing of non-controlled wood in transit	All logs are covered under the HVP electronic delivery note system that can trace all log deliveries to the coup of origin.	Low risk

Table 5: Supply Chain Risk Assessment for AKD Chips

Process	Current Measures	Risk	Additional Controls	Evidence
Harvest	Every harvest operation is authorised by AKD through the weekly planned deliveries spreadsheet and/or the expected deliveries email which includes operations numbers.	Risk with current measures: LOW/NO Risk	None required	Delivery dockets/e-dockets with required information.
	This identifies the contractors, the plantation, and the certification status.	Risk with Additional Controls: N/A		Weekly Planned Deliveries Spreadsheet. Expected deliveries.
Transport	All roundwood loads delivered to AKD - Yarram are transported directly from the forest.	Risk with current measures: LOW/NO Risk	None required	Delivery dockets/e-dockets with the required information.
	Chips delivered to OAP are under the control of AKD. All loads accompanied by transport documents	Risk with Additional Controls: N/A		Weekly Planned Deliveries Spreadsheet. Expected deliveries. Transport documentation Invoices.
Processing and storage at the AKD mills	Only processing single plantation species. Producing sawn timber-species easily identified. Site controls and weighbridge procedures.	Risk with current measures: LOW/NO Risk Risk with Additional Controls: N/A	None required	Sawlog delivery procedure

2.5.3. Risk Mitigation

Control measures will be implemented for all risk of mixing in the supply chain.

Opal will:

- Describe the risk of mixing within the supply chain.
- Provide a description of the implementation of the control measure
- Date of implementation
- Person responsible for the control measure
- Maintain records
- Final outcome of the measure

2.6. Stakeholder Consultation Process

This process is followed to conduct a formal stakeholder consultation when,

- the DDS is setup initially, and
- whenever a risk designation of control measure changes.

The procedure will also be used in instances when comments and/or complaints are received from stakeholder.

Stakeholder identification: Opal has identified affected and interested stakeholders in relation to the forest management activities of its suppliers and the identified risks, including the stakeholder group listed in Table 6.

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. Opal shall employ effective means to inform stakeholders, using culturally appropriate consultation techniques.

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.

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. Opal 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.

Stakeholder 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.

List of the stakeholder groups invited by Opal to participate in the consultation is maintained and made available for audit.

Table 6: Stakeholder groups

Interest	Stakeholders	Area of Interest	Members	Method of Engagement
Economic interests	<p>a) Forest owners and/or managers of large, medium and small forests, and high, medium, and low-intensity managed forests;</p> <p>b) Forest contractors (including loggers);</p> <p>c) Representatives of forest workers and forest industries;</p> <p>d) Certificate holders.</p>	Jobs, site sustainability, environment.	Maryvale Community Consultative Committee (MCCC): existing committee of community members, representatives from NGOs (Latrobe Valley Field Naturalists Club, Latrobe Valley Sustainability Group, Latrobe Catchment Landcare Group), forest industries, Latrobe City Council, Gippsland Water, EPA Victoria.	<p>Quarterly meetings, briefings, updates of status, project newsletters</p> <p>The next MCCC Quarterly Meeting is scheduled on 19/3/24</p>
	<p>Maryvale team members</p> <p>Unions</p>	Jobs, site sustainability, environmental, social and community impacts of transition.	<p>All personnel working at Maryvale Mill</p> <p>Gippsland Trades and Labour Council: AMWU, ETU, CFMEUMD</p>	Millwide notices, briefings, fact sheet, project newsletters
Environmental interests	<p>a) NGOs involved or with an interest in the environmental aspects of forest management. Consultation should target the following areas of interest and expertise:</p> <ul style="list-style-type: none"> - Biological diversity - Water and soil - HCV3 <p>b) Local communities and Indigenous Peoples' representatives</p> <p>3.4 FSC-accredited certification bodies active in the country</p> <p>3.5 National and state forest agencies</p>	<p>Environment, flows and quality to the Latrobe River, Environmental emissions and impacts</p> <p>Jobs, Environment, Site Sustainability.</p>	<p>Friends of Latrobe Waters (FLOW), Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC), The Wilderness Society, Environment East Gippsland.</p> <p>Neighbours: River Users -Farmer/landowner -1 onsite agistment (cows)</p>	<p>Briefings, meetings</p> <p>Direct contact</p>

	<p>3.6 Experts with expertise in controlled wood categories</p> <p>3.7 Research institutions and universities</p> <p>FSC Australia Representative in Australia</p>			
Social interests	<p>a) NGOs involved or with an interest in social aspects of forest management and other related operations;</p> <p>b) Forest workers;</p> <p>c) International, national, and local trade/labour unions.</p> <p>d) Representatives of local communities involved or with an interest in forest management, including those relevant for HCVs 5 and 6;</p> <p>e) Representatives of Indigenous Peoples and/or traditional peoples (if present and/or holding rights), including those relevant for HCVs 5 and 6;</p> <p>f) Representatives of recreational interests.</p>	Jobs, site sustainability, environment.	Maryvale Community Consultative Committee (CCC): existing committee of community members, representatives from NGOs (Latrobe Valley Field Naturalists Club, Latrobe Valley Sustainability Group, Latrobe Catchment Landcare Group), forest industries, Latrobe City Council, Gippsland Water, EPA Victoria.	<p>Quarterly meetings, briefings, updates of status, project newsletters</p> <p>The next MCCC Quarterly Meeting is scheduled on 19/3/24</p>

If there are any complaints from the stakeholders, the issues will be considered and investigated by Opal as per the Complaints Procedure (Appendix 4) and will be actioned as appropriate.

All issues will be documented and recorded in the CoC PowerApp Complaints and NCR Register. The stakeholders will be provided with a written explanation of the action taken to rectify any substantiated concerns. Please check **Complaints and NCR System (Doc ID: 72)**.

Stakeholder feedback: Within sixty (60) days after the end of the consultation period, Opal will respond to all stakeholders who participated in the consultation process, to explain how their comments were taken into account.

Consultation records: Opal will maintain 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.

Content of the report:

Opal 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 stakeholder groups invited by Opal to participate in the consultation;
- c) A summary of the stakeholder comments received. Normally, these will not be published but if there are comments, they may only be published with prior consent from the consulted stakeholder and not associated with stakeholder names;
- d) A description of how Opal has taken stakeholder comments into account;
- e) Opal'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.

2.7. Public Summary Report

Nominated management representative will complete a summary every year as per the clause 6.1 and 6.2 of the CW Standard.

Summary will include:

- a. Supply area, identification of the area with a homogeneous risk designation in the applicable risk assessment for each controlled wood category.
- b. Applicable Risk assessment (NRA) and designations
- c. Complaints procedure
- d. Contact information
For materials sourced from area not designated as low risk of origin, the summary will include
- e. Control measures implemented by Opal for each indicator
- f. Summary of the consultation process
- g. Expert engagement
- h. Findings of field verification

Refer to: OAP Public Summary Report (Doc ID: 503)

2.8. Fibre Supplier Registers Update

Supplier's details, CoC certificate details (if applicable) and risk assessment outcomes are updated/uploaded to the following locations on Opal Australia Paper SharePoint:

- **Fibre Suppliers Register** and the **Raw Materials Register**, or
- **Traded Products Library**

All supporting documents are uploaded in the above-mentioned registers which are also saved in the **Records Library in SharePoint**.

3. Documentation & Recording

3.1. Records Retention

The following records shall be maintained by the OAP representative by adding copies

- a) to the Central Office CoC PowerApp in SharePoint, or;
- b) in the case of round wood logs and wood chip supply, to the Maryvale Paradigm Document Management System:
 - Completed Fibre Supplier – Raw Material Questionnaire (Doc ID: 109)
 - Completed Fibre Supplier Inspection and Risk Assessment (Doc ID: 83)

Any other documents including information gathered via an equivalent information gathering method shall also be maintained in the same locations or in local files accessible by the OAP representative.

The organization retains relevant records for a minimum of five (5) years.

Opal will maintain records and documentation demonstrating its conformity with this standard and ensure that they are readily available to the certification body.

3.2. Accounting Control Notification

Addition of new suppliers or changes in percentage of certified supplied materials shall be communicated to the following:

- CoC Management Representative (Sustainability Manager)
- Maryvale Business Systems Manager
- Maryvale Commercial Accountant

4. Continuous Improvements

4.1. Internal audit of DDS

Opal's Maryvale mill is internally audited at least annually to ensure that the controlled wood standard is being implemented correctly. The scope, dates, and staff involved in the internal audit are recorded.

Where the DDS is evaluated as ineffective during the internal audit:

- All non-conformances during the audit will be recorded in the CoC PowerApp's Complaints and NCR Register.
- All CARs are addressed and corrected within 12 months of their detection.

4.2. Supplier Suspension

At any time, should any supplier fail to maintain contractual performance criteria and/or certification validity then notification shall be made to CoC Management Representative (Sustainability Manager) for action and as necessary suspension of supplier from certified scope.

5. Stakeholder Complaints

Opal will ensure adherence to section 7.1 and 7.2 of the CW standard to handle comments and complaints from stakeholders related to DDS.

On the receipt of a stakeholder complaint, Opal will follow Section 3 of **Complaints and NCR System (Doc ID: 72)**.

6. Training

Training: All relevant staff are trained and demonstrate awareness of the organization’s procedures, and competence in implementing the applicable requirements of this standard.

7. References

The following internal documents are referenced (the latest version edition applies):

- Fibre Supply Procedure (DocID 106)
- Fibre Supplier – Raw Material Questionnaire (DocID 109)
- Fibre Supplier Inspection and Risk Assessment (DocID 83)
- FSC Manufacturing procedure (OrigID 47386)
- Delivery Handling and Storage of raw materials M4 (14467)

8. Expert Review and Input

Information on the engagement of one or more experts in the development of control measures are listed in the table below:

Table 6: Expert and qualification

Expert used and qualifications	Expert Input
<p>Kevin O’Grady – External Consultant/ Subject Matter Expert</p> <p>Kevin O’Grady is the Managing Director of Pinnacle Quality and works in a range of sustainability standards including FSC and the Alliance for water stewardship.</p> <p>He 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>He was the 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 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 Australia.</p>	<p>Develop and draft the Risk assessment and Due Diligence system for Opal Australian Paper’s Maryvale mill.</p>
<p>Ardi Sastrohartoyo – Business Systems Manager</p> <p>Bachelor of Engineering and Masters in Technology Management and Business Administration with over 20 years of experience.</p> <p>Opal Chain of Custody Internal Auditor (FSC/ PEFC) and Maryvale Chain of Custody Management Representative.</p>	<p>Oversees the management systems including FSC and PEFC certifications for OAP Maryvale.</p>

<p>Simon Gatt - Resource Manager Bachelor of Science (Forestry) and Masters in Business Administration. 25 years of experience in pine plantation management and harvesting.</p>	<p>Oversees the FSC certification for AKD.</p>
<p>Jo Foster - Harvesting Manager Graduate Diploma of Forest Science and Management 30 years of experience in pine plantation management and harvesting</p>	<p>Ensure overall compliance against the FSC standard requirements in both Chain of Custody and Controlled Wood for AKD.</p>
<p>Alan Rossouw - Estate Manager Bachelor of Science (Forestry) 25 years of experience in Pine and Blue gum plantation management and harvesting.</p>	<p>Estate management Indigenous expert</p>
<p>Belinda Gardiner - Technical Services Manager Bachelor of Science (Forestry) 5 years of experience</p>	<p>Harvest planning Mapping</p>
<p>Jason Biddle - Harvesting Forester 10 years of experience in pine sawmilling, logistics and harvesting</p>	<p>Harvest planning</p>
<p>Ralph Hossack - Harvesting supervisor 15 years of experience in pine plantation management and harvesting</p>	<p>Harvest planning</p>
<p>Sue Harris - Environmental Consultant Bachelor of Science (Forestry)</p>	<p>Pre- and post-harvest ecological surveys</p>
<p>Tim McBride – Environment and Certification Manager</p>	<p>Ensure overall compliance against the FSC standard requirements for HVP.</p>
<p>Mark Howe – Customer & Haulage Manager</p>	<p>Oversees the FSC certification for HVP.</p>
<p>HVP's HCV Experts Richard Francis, Director/Consultant Ecologist, Botanist, Zoologist David De Angelis, Abzeco Pty Ltd Kathleen Hislop, Heritage Insights Joanne Bell, Jo Bell Heritage Services</p>	<p>High Conservation Values Subject Matter Expert</p>

9. Company Contact Details

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10. Appendix: Maryvale Supplier List (non-certified)

The table below lists the current suppliers that provided non-FSC certified inputs which have been assessed through the Controlled Wood DDS process. This information is also captured in the Chain of Custody PowerApps's **Fibre Supplier Register**.

Supplier Name	Address	Geo location	Supplying Coupe List (name and ID)	Product type	Species	Size of forest	Plantation or Native	Material category	FSC, CoC certificate or CW (if applicable)	Comments
HVP Plantations		146.437960 & -38.615380	P33291, Laws Sharefarm	Softwood logs	Pinus Radiata	57 Hectares	Plantation	Controlled material	N/A	
				Harwood logs	Eucalyptus Nitens Eucalyptus Regnans Eucalyptus Globulus		Plantation			No private euc harvested and supplied in the last two years. Will be included in the risk assessment if included in the 2024/25 Timber Harvesting Plan (THP).
AKD Softwoods via HVP		146.437960 & -38.615380		Softwood wood chips	Pinus Radiata		Plantation		N/A	
AKD Softwoods via AKD		-37.800903, 143.780736	222, Dereel	Softwood wood chips	Pinus Radiata	294 Hectares	Plantation	N/A		
		-37.800903, 144.130745	207, Moreep			448 Hectares		N/A		
		-37.809280, 144.003140	208, Doyles Road			155 Hectares		N/A		