

Opal.	Title: OAP CW Public Summary Report Template
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Opal Maryvale Mill – Due Diligence System Public Summary Report

FSC® Controlled Wood Standard (FSC-STD-40-005 v3-1 EN)

Organization Name	Opal Australian Paper, Maryvale Mill
FSC Chain of Custody Certificate Number	SCS-COC-005450 (FSC-C127957) ¹
FSC Controlled Wood Certificate Number	SCS-CW-005450

1. Description of the Supply Area(s) and Respective Risk Designation(s)

Description of Supply Area	CW Category	Risk Designation	Type of Risk Assessment	Reference of Risk Assessment
Softwood plantations in Gippsland and Western Victoria, Victoria, Australia	Category 1	Negligible	☑ FSC risk assessment	FSC-NRA-AU V2-0 for Australia
	Category 2	Negligible		
	Category 3.1, 3.2, 3.3, 3.5	Negligible		
Hardwood plantations in Gippsland, Victoria, Australia	Category 3.4 and 3.6	Non-negligible		
	Category 4	Non-negligible		
	Category 5	Negligible		

¹ OAP has recently changed its certification arrangements. The previous FSC certificate code SCS-COC-105551 and licence code FSC-C002059 has been replaced with SCS-COC-005450 and licence code FSC-C127957.

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2. Description of the Supply Chain Risk Assessment and Respective Risk Designation(s)

Supply chain sourcing area / Supply chain actor	Description of Risk Assessment (risk of mixing material with non-eligible inputs in the supply chain/s during transport, processing, and storage)	Residual risk
Harvest , all supply units	<p>Risk of taking wood from blocks that are not covered under the Due Diligence System. Wood from outside the risk assessed area. Addressed by mitigation measures:</p> <ul style="list-style-type: none"> - Supplier questionnaire and risk assessment - Supplier agreements - Woodflow planning and liaison with suppliers - Almost all logs originate from FSC certified plantations or plantations managed by FSC certified entities. - Suppliers of non-FSC certified inputs plan and manage harvesting or conduct audits of sub-suppliers. - Supplier controls including timber harvest plans, inductions and operational harvest monitoring - Linking authorised operations to site using coupe identifier - THP Review by OAP - Verification audits 	Negligible
Log transport from forest to mill / Maryvale , all supply units	<p>Risk of mixing of non-eligible logs during transport from the forest to the mill (Maryvale or sawmill). Addressed by mitigation measures:</p> <ul style="list-style-type: none"> - Woodflow planning and liaison with suppliers regarding authorised operations - Delivery documentation (electronic or paper based) linking delivery to authorised operation and supplier - Log delivery direct from forest (except reject logs from sawmill supplier) - Sawmill receiving procedures verify delivery from authorised operation - Sawmill conducts daily delivery reconciliation - Verification audit at sawmill 	Negligible
Processing and storage , sawmill chip co-product only	<p>Risk of mixing of non-eligible inputs during storage and processing at sawmill. Addressed by mitigation measures:</p> <ul style="list-style-type: none"> - Input segregation in log yard - Single plantation species processed 	Negligible

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Supply chain sourcing area / Supply chain actor	Description of Risk Assessment (risk of mixing material with non-eligible inputs in the supply chain/s during transport, processing, and storage)	Residual risk
	<ul style="list-style-type: none"> - Chp production from green mill offcuts only - Segregated chip storage - Verification audits 	
Chip transport from mill to Maryvale, sawmill chip co-product only	<p>Risk of mixing of non-eligible chip during transport from the sawmill to the Maryvale mill. Addressed by mitigation measures:</p> <ul style="list-style-type: none"> - Delivery direct from sawmill to Maryvale - Delivery documentation linking delivery to supplier - Monthly delivery reconcillation 	Negligible
Receival at Maryvale, all products	<p>Risk of mixing of non-eligible logs or chip during receival at the Maryvale mill. Addressed by mitigation measures:</p> <ul style="list-style-type: none"> - Security and weighbridge system controls truck entry to site - Receiving procedures verify delivery from authorised operation - Daily log delivery reconcillation and monthly chip delivery reconcillation. - Internal CoC audit 	Negligible

3. Mitigation Measures Implemented by the Organization

Sourcing Area/Supply chain area	Indicator with non-negligible risk	Description of mitigation measure	Residual risk
Victoria, Gippsland and Western regions, softwood plantations Victoria, Gippsland for hardwood plantations	3.4, 3.6 and 4.1	<p>Supplier controls for operations they manage directly include:</p> <ul style="list-style-type: none"> - Site assessments to identify HCV using best available information, site inspection, stakeholder (including Indigenous Peoples connected to the management unit) and expert consultation - Timber harvest plan and associated procedures prepared in accordance with the Victorian Code of Practices for Timber Production that includes mapping and 	Negligible


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Sourcing Area/Supply chain area	Indicator with non-negligible risk	Description of mitigation measure	Residual risk
		<p>effective management actions to maintain HCV, prevent conversion and comply with relevant law.</p> <ul style="list-style-type: none"> - Contractor inductions to ensure all aspects of the timber harvesting plan are communicated to all workers on site - Operational monitoring conducted to ensure the timber harvesting plan is being implemented correctly and emerging issues appropriately managed. <p>Supplier controls for operations managed by sub-suppliers include:</p> <ul style="list-style-type: none"> - Validation of certification status (certified sub-suppliers only) - Verification audits to confirm non-negligible risks are being mitigated appropriately. <p>OAP mitigation measures are applied to ensure risk is assessed accurately and to monitor and enforce implementation of appropriate mitigation measures by suppliers. These include:</p> <ul style="list-style-type: none"> - Information gathering and risk assessment - Supplier contracts - Physical segregation in the wood yard - Woodflow planning - THP review - Verification Audit Program 	

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4. Stakeholder Consultation Summary

The areas for which the stakeholder consultation has been conducted (e.g. geo-reference data, state, province, supply unit)	Geographical location – Gippsland and Western Regions of Victoria
Stakeholder engagement date(s):	<p>18 June – 29 July 2024 General stakeholder email consultation in accordance with Appendix B of FSC-STD-40-005 V3-1 for softwood inputs from Gippsland and Western Region of Victoria, Australia.</p> <p>Maryvale Community Consultative Committee (CCC) Meeting 19 March 2024 and 11 June 2024 at Morwell Innovation Centre. The next CCC meeting is scheduled on Tuesday, 24 September 2024 at Morwell Innovation Centre.</p> <p>18 March – 5 May 2024 general stakeholder email consultation for softwood and eucalypt inputs from Gippsland, Victoria Australia.</p>
Means of Contact, please check all that apply	
<input checked="" type="checkbox"/> Face to face meetings <input type="checkbox"/> Personal contacts by phone <input checked="" type="checkbox"/> Email, or letter <input type="checkbox"/> Notice published in the national and/or local press	<input checked="" type="checkbox"/> Notice published on relevant websites <input type="checkbox"/> Local radio announcements <input type="checkbox"/> Local customary notice boards <input type="checkbox"/> Social media broadcast
List of the stakeholder groups invited by the organization to participate in the consultation, please check all that apply	
<input checked="" type="checkbox"/> Economic interests <input checked="" type="checkbox"/> Social interests <input checked="" type="checkbox"/> Environmental interests <input checked="" type="checkbox"/> FSC-accredited certification bodies active in the country <input checked="" type="checkbox"/> National and state forest agencies	<input checked="" type="checkbox"/> Experts with expertise in controlled wood categories <input checked="" type="checkbox"/> Research institutions and universities <input checked="" type="checkbox"/> FSC regional offices, FSC network partners, registered standard development groups and NRA working groups in the region
Summary of the stakeholder comments received and considerations	
Stakeholder comments (email and notice responses)	Several stakeholders made contact during the March 2024 OAP Due Diligence System consultation process to ask for clarification about the scope of the consultation and what feedback is requested.

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Consideration	OAP has sought stakeholder input in accordance with Annex B of FSC-STD-40-005 v3-1 regarding its proposed FSC Controlled Wood Due Diligence System (DDS) for softwood fibre supply inputs to the Maryvale site and the management of High Conservation Values (HCVs) such as forests providing critical ecosystem services or containing significant cultural values. FSC Australia, through their national risk assessment process has determined there are non-negligible risks to these values requiring mitigation. OAPs DDS mitigation measures are described in sections 2 and 3 above. They apply to all uncertified softwood inputs to production at Maryvale mill, regardless of the scale of operations.
Stakeholder comments (Maryvale Community Consultative Committee meeting)	A meeting was held with the Maryvale Community Consultative Committee on 11 June 2024 where progress towards FSC Controlled Wood certification was discussed. Questions were fielded regarding the implications of Maryvale’s FSC Controlled Wood certification for small private growers.
Consideration	OAP has included in its DDS supply chain map the option for inputs from small private growers either as direct supplies to Maryvale or as inputs to AKD Yarram. During the procurement activities, OAP conducts a risk assessment for new suppliers where the suppliers’ mitigation of FSC Controlled Wood risks is reviewed and used to determine the eligibility of the materials. The supplier may seek assistance from a specialist consultant to prepare appropriate harvesting plans to ensure the eligibility of the proposed materials.
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	
Note: Comments shall only be published with prior consent from the consulted stakeholder and not associated with stakeholder’s personal identifiable information.	
Stakeholder consultation was conducted in Gippsland during March/April 2024 in relation to the Maryvale DDS and maintenance of High Conservation Values. A pre-evaluation audit conducted in May 2024 identified that the DDS and consultation were insufficient to mitigate risk of unacceptable sources entering the supply chain as they did not fully meet the requirements of the FSC Controlled Wood standard. Further modifications have been made to the DDS to address these findings. A second round of consultation in accordance with Annex B of FSC-STD-40-005 V3-1 commenced mid June 2024. This involved a meeting with the Maryvale Community Consultative Committee and distribution of the DDS public notice and stakeholder feedback to Gippsland and Western Regions and some additional stakeholder groups on 18 June 2024. Some feedback was received at the meeting, but none on the second broadcast distribution of the DDS public notice. The consultation summary presented above reflects the results of this work.	

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5. Expert Engagement Summary

Expert A	
Qualification	<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. 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 which developed the updated National Risk Assessment for Australia and was a consultant on the Centralized National Risk assessment developed for Australia.</p>
Scope of Service	Develop and draft the Risk assessment and Due Diligence system for Opal Australian Paper’s Maryvale mill.
Expert B	
Qualification	Tuesday Phelan holds a Bachelor of Forest Science and is a certified integrated management systems auditor. She has 30 years experience in the forest industry and 10 years experience conducting forest certification and environmental auditing on behalf of certification bodies and certificate holders. Tuesday regularly consults to organisations implementing FSC forest management and chain of custody standards.
Scope of Service	Revise and assist with implementation of Opal Australian Paper’s FSC Controlled Wood Due Diligence System.
Publicly available expertise	
	This DDS applies mitigation measures specified within the FSC National Risk Assessment for Australia and HCV Evaluation Framework. These documents list the experts consulted in their development.

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6. Verification Summary

Findings from verification	<p>HVP Systems Audit</p> <p>Confirmed the organisation is applying the mitigation measures specified in the DDS effectively. Only non-FSC certified forests used to supply softwood and hardwood (Eucalypt) inputs to OAP are sharefarms it manages. The sharefarms are subject to the management systems as HVPs certified forests and were subject to a comprehensive estate wide HCV assessment in 2020 and the HCV management system. The HCV assessment applied best available information and included field inspections, expert and stakeholder input. The HCV management system includes automated spatial checks for HCVs identified through the assessment as being present within the estate. HVP implements relevant standards and procedures addressing the mandatory risk mitigations for HCV 4 and 6. HCVs of relevance to the operation are documented in the site values checklist with mitigation measures documented in the THP. There have been no non-FSC certified inputs received from HVP during the reporting period commencing 1 November 2023. An example field audit was conducted in an active eucalypt plantation harvesting operation to assess implementation of the mitigation measures.</p> <p>Two minor findings were made that have no impact on the effectiveness of the DDS relating to the supplier questionnaire and the supplier agreement.</p> <p>HVP Boola 117, Roberts Road (21/2/2024), Geolocation: -38.151401 / 146.432188 (Plantation species: Eucalyptus globulus ssp. Globulus)</p> <p>The requirements for mitigation measures have been met. No non-compliances were identified in this audit. THP identified control measures for HCV-4 forest areas that provide basic services of nature in critical situations. There is an erosion gully on the map, control measures are slash retention, preventing water flow in the gully, water crossing points are designated and protected, water 5m set backs applied on the map (20m is used for major waterways), wet weather shutdowns, etc. No HCV6 present. Procedures are in place for pre-harvest inspections with external specialists. Conversion confirmed not to be occurring.</p>
Steps taken by the organization to address identified non-conformities	<p>Accurate information gathered through ongoing supplier liason activities.</p> <p>Formal communication to supplier confirming OAPs commitment to not accept wood from unacceptable sources and explanation of FSC Controlled Wood requirements for OAP and its suppliers.</p>

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Findings from verification	<p>AKD Yarram systems audit</p> <p>Confirmed that non-negligible risks were effectively mitigated for all inputs from non-FSC certified origins through AKD Colac’s FSC Controlled Wood DDS. There were a number of findings confirming some inaccuracies in the DDS and insufficient arrangements to implement mitigation measures.</p> <p>The audit confirmed AKD Yarram does not have effective systems for identifying and notifying OAP when it is receiving uncertified inputs from HVP and supplying the THP for review.</p> <p>THP reviews were not conducted for AKD Yarram non-FSC certified inputs.</p> <p>The DDS is inaccurate in that:</p> <ul style="list-style-type: none"> - AKD Yarram may occasionally source inputs from uncertified suppliers other than its own forests - AKD Yarram does not use operations numbers <p>AKD Dereel, Mt Mercer-Dercel Road (22/02/2024) Geolocation: - 37.800903, 143.780736</p> <p>The requirements for mitigation measures have been met. No non-compliances were identified in this audit.</p> <p>THP identified mitigation measures for HCV-4 forest areas that provide basic services of nature in critical situations. Soils mapped, contours mapped and light undulation slope, no water authority instructions. Mitigation measures identified in the map were slash retention used for erosion control, traffic management plan in place. There was also evidence of weekly harvest QA in place.</p> <p>No HCV6 present.</p> <p>Category 4 (conversion): Wood is only sourced from plantation site – pinus radiata.</p> <p>AKD Moreep, 1237 Ballan – Meredith Rd, Morrisons, 3334 Geolocation: - 37.800903, 144.130745</p> <p>The requirements for mitigation measures have been met. No non-compliances were identified in this audit.</p>
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Findings	<p>No HCV4 or HCV6 present. Routine application of the Code, water quality and sediment mitigation measures. Controls in place in event of suspected or located cultural heritage site discovery within plantation.</p> <p>Category 4 (conversion): Wood is only sourced from plantation site – pinus radiata.</p> <p>AKD Doyles, Doyles Road, Elaine, 3334 Geolocation: -37.809280, 144.003140</p> <p>The requirements for mitigation measures have been met. No non-compliances were identified in this audit.</p> <p>No HCV4 or HCV6 present. Routine application of the Code, water quality and sediment mitigation measures. Controls in place in event of suspected or located cultural heritage site discovery within plantation.</p> <p>Category 4 (conversion): Wood is only sourced from plantation site – pinus radiata.</p>
Steps taken by the organization to address identified non-conformities	<p>Mechanisms agreed in writing for monitoring upcoming non-FSC certified inputs from sub-suppliers, notifying OAP and supplying the THP for review.</p> <p>Completed THP reviews for Dereel, Moreep and Doyles Rd.</p> <p>Corrected inaccurate supplier information in the DDS.</p>

The confidential nature of the information may be determined by the legislation that the organization must comply with. Commercially sensitive information, and the names of individual landholders, shall be treated as confidential information.

Not Applicable - The organization has not excluded confidential information.


The organization's justification for the exclusion of confidential information.

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7. Procedure for Filing Complaints

Name of Authorized Representative	Lauren Wood, Environment & Sustainability Manager and CoC Management Representative
Contact Detail	Email: sustainability@opalanz.com
Procedure for filing complaints	<p>Opal ensures adherence to section 7.1 and 7.2 of the CW standard to handle comments and complaints from stakeholders related to its DDS.</p> <p>On the receipt of a stakeholder complaint, Opal will</p> <ol style="list-style-type: none"> a. Acknowledge the receipt of complaints; b. Inform stakeholders of the complaint procedure, and providing an initial response to complainants within a time period of two (2) weeks; <p>If a complaint is related to the FSC NRA, Opal will forward the complaints to FSC Australia and clauses 7.2. c) - j) will not apply.</p> <ol style="list-style-type: none"> c. Conduct a preliminary assessment to determine whether evidence provided in a complaint is or is not substantial, by assessing the evidence provided against the risk of using material from unacceptable sources; d. Initiate a dialogue with complainants that aims to solve complaints assessed as substantial before further actions are taken; e. Forward substantial complaints to the certification body and relevant FSC National Office for the supply area within two (2) weeks of receipt of the complaint. Information on the steps to be taken by the organization in order to resolve the complaint, as well as how a precautionary approach will be used, shall be included with the complaint; f. Employ a precautionary approach towards the continued sourcing of the relevant material while a complaint is pending; g. Implement a process (e.g. field verification and/or desk verification) to verify a complaint assessed as substantial by the

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	<p>organization, within two (2) months of its receipt;</p> <p>h. Determine the corrective action to be taken by suppliers and the means to enforce its implementation by a supplier if a complaint has been assessed and verified as substantial. If a corrective action cannot be determined and/or enforced, the relevant material and/or suppliers shall be excluded by the organization;</p> <p>i. Verify whether corrective action has been taken by suppliers and whether it is effective;</p> <p>j. Exclude the relevant material and suppliers from the organization’s supply chain if no corrective action is taken;</p> <p>k. Inform the complainant, the certification body, and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution, and for maintaining copies of relevant correspondence; and</p> <p>Record and file all complaints received and actions taken in Opal’s Central Complaints Registry.</p>
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