

PEFC
Fibre Supplier Risk Assessment

October 2026
Version 16

VISY
FOR A BETTER WORLD

Intent

To assess the risk of procuring fibre from controversial sources for use by Visy Pulp and Paper Pty Ltd Tumut for the manufacture of paper products and for the trade in fibre-based products without physical possession. Both the geographical origin and complexity of the supply chain shall be assessed.

Risk and mitigation is documented and aligned with the Programme for the Endorsement of Forest Certification (PEFC) Due Diligence System (DDS) for the avoidance of material from controversial sources in Appendix 1 of *Chain of Custody for Forest Based Products PEFC ST 2002:2020* and the sale of PEFC Controlled Sources.

VISY'S RESPONSIBLE SOURCING COMMITMENT

Visy is committed to conducting a comprehensive ongoing assessment of its raw material supplies to the source.

Social:

"Ensuring employees and communities are not negatively affected throughout the entire supply chain"

Environment:

"Maintaining or enhancing the environment from where the material is sourced to ensure long-term access to resources"

Business and Integrity:

"Ensuring appropriate agreements are established and maintained with suppliers throughout Visy's supply chain"

Why

To avoid sourcing and trading wood and fibre from controversial sources as defined by the PEFC standards.

PEFC defines *Controversial sources* as follows:

Forest and tree-based material sourced from:

a. Activities not complying with applicable local, national or international legislation on forest management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; anticorruption and the payment of applicable royalties and taxes.

b. Activities where the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis is not maintained or harvesting levels exceed a rate that can be sustained in the long term.

c. Activities where forest management does not contribute to the maintenance, conservation or enhancement of biodiversity on landscape, ecosystem, species or genetic levels.

d. Activities where ecologically important forest areas are not identified, protected, conserved or set aside.

e. Activities where forest conversions occur, in other than justified circumstances where the conversion:

   i. is in compliance with national and regional policy and legislation applicable for land use and forest management, and
   ii. does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas, and
   iii. does not destroy areas of significantly high carbon stock, and
   iv. makes a contribution to long-term conservation, economic, and/or social benefits.

f. Activities where the spirit of the ILO Declaration on Fundamental Principles and Rights at Work (1998) is not met.

g. Activities where the spirit of the United Nations Declaration on the Rights of Indigenous Peoples (2007) is not met.

h. Conflict timber.

i. Genetically modified trees

This assessment ensures there is a credible recognition system for verification of the origin and supply chain of the wood or forest products used in subsequent processes. The recognition system distinguishes between Certified Material and Other Material[1] including specification of the percentage of Certified Material in each delivery (i.e. Material inventory).

All products produced at the Visy's Pulp & Paper site in Tumut NSW, are assessed under this PEFC material risk assessment and due diligence system. Details of Visy's fibre sourcing activities are available on the Visy website.

How

Due Diligence will be completed by either the Fibre and Forestry Manager or the Program Manager – Fibre Stewardship following the process contained in the *Visy Pulp and Paper DDS Process Summary* and this document.

Visy collects information regarding fibre supplied including tree species (scientific and common name) and country and region of harvest for use in determining risk of the fibre originating from controversial sources via this risk assessment. This information is provided to customers on request for use in their own due diligence systems.

[1] *As defined in Chain of Custody for Forest Based Products PEFC ST 2002:2020*

The Fibre and Forestry Manager will complete the review matrix below (under heading “Risk Assessment Summary”) for every current and new fibre supplier. This will be completed prior to the acceptance of material from that supplier. The references for determining risk acceptability will be updated annually.

PEFC risk assessment categories are determined by criteria in the standards, and these will be updated by the Program Manager – Fibre Stewardship as PEFC announce changes.

The risk assessment has been divided into two distinct groups:

a. Certified Suppliers: certified (AFS/RW) suppliers who meet the criteria under section 3, Appendix 1 of the standard (PEFC ST 2002:2020) Table 1, for negligible risk. These suppliers are considered low risk at the origin and supply chain level as determined by the standard.
b. Uncertified Suppliers: non-certified suppliers of wood and chip supplied direct to Visy or traded by Visy without Physical Possession.

Most of Visy’s wood supply comes from the distinct eco-region: ***eastern Australia temperate forests*** in New South Wales, Australian Capital Territory, Victoria and South Australia. All wood is sourced from the same families of softwood pine.

Visy is not procuring any raw material originating from species listed in Appendix I to III of CITES.

Additional wood fibre is purchased as ‘Bleached Pulp’. These sources are all from forests and pulp mills that are either FSC or PEFC Chain of Custody certified.. See Table 1 below for details of Bleached pulp suppliers.

This risk assessment will remain valid for 12 months from the date of completion unless any significant changes to the supply chain or origin exist.

Table 1 – Bleached Pulp Supply

Supplier	Product name/description	Original supplier information	Country of origin	PEFC/FSC certificate details	Species details
Mondi South Africa (Pty) Ltd	Bleached pulp Eucalyptus	Richards Bay Mill	South Africa	SGSCH-PEFC-COC-600005 SGSCH-COC-000359	Eucalyptus grandis (Flooded gum) Eucalyptus smithil (Gully gum) Eucalyptus camaldulensis (River Red gum) Eucalyptus saligna (Sydney blue gum)
Oji Fibre Solutions	Bleached softwood pulp	Oji Fibre Solutions	New Zealand	ITKUS-PEFC-COC-1712698 SAI-COC-002173	Pinus radiata (radiata pine, Monterey pine)
Ekman Group	Arauco EKP/ECF bleached Eucalyptus Kraft pulp	Celulosa Arauco Y Constitucion S.A (Arauco)	Chile	PBN-PEFC-COC-007304 PBN-COC-007304	Eucalyptus globulus (blue gum) Eucalyptus Nitens (shining gum)
Metsa Fibre Oy	Botnia Nordic Pine AKI	Metsa Fibre Oy	Finland	INS-PEFC-COC-202343 INS-COC-100010	Betula pendula (white birch) Betula pubescens (downy birch) Picea abies (Norway spruce) Pinus sylvestris (Scotch pine) Populus tremula (quaking aspen)
CMPC Santa Fe	Bleached pulp Eucalyptus	CMPC Santa Fe	Chile	SGSCH-PEFC-COC-820002 PBN-COC-006571	Eucalyptus globulus Labill. (southern blue gum) Eucalyptus nitens (shining gum);
Marubeni	Pulp bleach Eucalyptus	Klabin S.A. Unidade de Celulose – Ortigueira	Brazil	IMA-PEFC-COC-0011 IMA-COC-007391	Acacia mangium (Hickory wattle, silver wattle) Eucalyptus pellita (red mahogany)

PEFC indicators for negligible risk



1. Wood based fibre supplied as PEFC certified.

2. Sustainable Forest Management (AS/NZ 4708-2021) certified wood raw material or certified wood raw material from other national certification schemes recognised as substantively equivalent. Supplies declared as certified against a forest certification system (other than PEFC endorsed), addressing the activities covered by the term controversial sources, supported by a forest management, chain of custody or fibre sourcing certificate issued by a third party certification body.

3. Material not certified to any of the above but supported by verifiable documentation that clearly identifies:

    a. Country of harvest and/or sub-national region where the timber was harvested, where the latest Transparency International (TI) Corruption Perception Index (CPI) score is higher than 50, or where the latest World Justice Project (WJP) Rule of Law Index is higher than 0,5, and

    b. trade name and type of product as well as the common name of tree species and, where applicable, its full scientific name, and

    c. all suppliers within the supply chain, and

    d. the forest area of the supply origin, and

    e. documents, including contractual agreements and self-declarations, or other reliable information indicating that products do not originate from controversial sources.

Tables 4 and 5 have PEFC Risk Assessments for Pulplogs and Woodchips supplied to Visy Pulp & Paper in Tumut NSW. All supplies are from softwood plantations in Australia (NSW, Vic, SA and ACT) assessed against the requirements of the standard *PEFC ST 2002:2020*, Appendix 1 section 3. This may be traded as PEFC Controlled Sources.

Sources used to determine compliance with risk assessment category and indicator statements will be entered into the sources column.

The justification for use of these sources will be entered in the justification column. This explains the reasoning behind the risk allocation.

Risk assessment summary

Table 2 – Visy Pulp and Paper PEFC risk assessment 2026-2027

Company name	Visy Pulp and Paper Pty Ltd - Tumut Mill	Chain of Custody No.	SCS-PEFC-COC-003987
Company address	1302 Snowy Mountains Hwy, Tumut NSW Australia 2720		
Scope of the assessment	Pulp logs and Sawmill chip procured from Ecoregion: temperate broadleaf and mixed forest for the purposes of Kraft paper manufacturing at Visy Pulp and Paper – Tumut Mill and for the trading in PEFC Controlled Sources.		

Table 3 – Bleached Pulp certified to PEFC or other forest certification scheme addressing controversial sources

PEFC indicator	Scale of assessment	Sources used	Justification	Risk level
a. **Activities not complying with applicable local, national or international legislation on forest management**	certification	PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. FSC Chain of Custody certification addresses compliance with local, national and international legislation	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**
b. **Activities where the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis is not maintained or harvesting levels exceed a rate that can be sustained in the long term.**	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**
c. **Activities where forest management does not contribute to the maintenance, conservation or enhancement of biodiversity on landscape, ecosystem, species or genetic levels.** d. **Activities where ecologically important forest areas are not identified, protected, conserved or set aside.**	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses preservation of ecologically important forest areas	Likelihood at origin level = low Likelihood at supply chain level = low **Negligible**

e. Activities where forest conversions occur, in other than justified circumstances.	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses forest conversion	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**
f. Activities where the spirit of the ILO Declaration on Fundamental Principles and Rights at Work (1998) is not met.	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses ILO Declaration on Fundamental Principles and Rights at Work	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**
g. Activities where the spirit of the United Nations Declaration on the Rights of Indigenous Peoples (2007) is not met.	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses the Rights of Indigenous Peoples.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**

h.	Conflict timber.	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses conflict timber.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**
i.	Genetically modified trees.	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses genetically modified trees.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**

Visy only purchases bleached that is certified to PEFC or other forest certification that addresses controversial sources.

Visy has determined that there is a 'negligible' risk that the bleached pulp products supplied to Visy are from controversial sources

Table 4 – Pulplog and Woodchip Suppliers certified to PEFC, AS/NZS 4708-2021 or other forest certification scheme addressing controversial sources

PEFC indicator	Scale of assessment	Sources used	Justification	Risk level
a. Activities not complying with applicable local, national or international legislation on forest management	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses compliance with local, national and international legislation	Likelihood at origin level = **low** Likelihood at supply chain level = **low** Negligible
b. Activities where the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis is not maintained or harvesting levels exceed a rate that can be sustained in the long term.	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**
c. Activities where forest management does not contribute to the maintenance, conservation or enhancement of biodiversity on landscape, ecosystem, species or genetic levels. **d. Activities where ecologically important forest areas are not identified, protected, conserved or set aside.**	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses preservation of ecologically important forest areas	Likelihood at origin level = **low** Likelihood at supply chain level = **low** Negligible

e.	**Activities where forest conversions occur, in other than justified circumstances.**	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses forest conversion	Likelihood at origin level = **low** Likelihood at supply chain level = **low** Negligible
f.	**Activities where the spirit of the ILO Declaration on Fundamental Principles and Rights at Work (1998) is not met.**	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses ILO Declaration on Fundamental Principles and Rights at Work	Likelihood at origin level = **low** Likelihood at supply chain level = **low** Negligible
g.	**Activities where the spirit of the United Nations Declaration on the Rights of Indigenous Peoples (2007) is not met.**	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses the Rights of Indigenous Peoples.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** Negligible

h.	**Conflict timber.**	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses conflict timber.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** Negligible
i.	**Genetically modified trees.**	certification	AS-NZS 4708-2021 Responsible Wood/PEFC Certificate Other forest certification certificate	Certificates from certified suppliers are verified prior to delivery. Where a contract is in effect over a period of time, certifications will be verified for each supplier at least annually. FSC FM or FSC Controlled Wood certification addresses genetically modified trees.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** Negligible

Table 5 – Pulplog and Woodchip Suppliers **not certified** to PEFC, AS/NZS 4708-2021 or other forest certification scheme addressing controversial sources

PEFC indicator	Scale of assessment	Sources used	Justification	Risk level
a. Activities not complying with applicable local, national or international legislation on forest management, including but not limited to forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous peoples, local communities or other affected stakeholders; health, labour and safety issues; anticorruption and the payment of applicable royalties and taxes **i.** The latest Transparency International (TI) Corruption Perception Index (CPI) score of the country is lower than 50 or the latest World Justice Project (WJP) Rule of Law Index of the country score > 0.5. **ii.** The country/region is known as a country with low level of forest governance and law enforcement **iii.** Tree species included in the material/product is known as species with prevalence of activities covered by the term controversial	Supplier, state, country	*https://sourcinghub.preferredbynature.org/* **State based Legislation and Codes of Practice for Forestry** **NSW & ACT:** *Plantation and Reafforestation Act 1999* *Plantation and Reafforestation (Code) Regulation 2001*. *Forestry Act 2012* *Forest Practices Code (NSW)* *ACT Code of Forest Practice 2005* **VIC:** *Code of Practice for Timber Production 2014 (as amended 2022)* *Planning and Environment Act 1987* **South Australia:** *Forestry Act 1950* *Forestry Regulations 2013* **National:** *Illegal Logging and Prohibition Act (2012)* *Australia's State of the Forests Report 2023* *1.1a.i Forest area by forest type (2023) - DAFF (agriculture.gov.au)*	Considered 'Low Risk' – Nepcon Timber Legality Risk Assessment – Australia (2017) for all wood sourcing within Australia except Sandalwood. According to Transparency International Australia's 2025 CPI was 76/100. According to Australia's "State of the forests" report for 2023, published by The Department of Agriculture, more than half (58%) of Australia's plantation forests are exotic softwood species (predominantly radiata pine) and is commercially and environmentally managed in the area of supply. Documents, including contractual agreements and self-declarations. Harvest Plans are provided by Visy's **uncertified** pulplog suppliers. These are reviewed for compliance prior to accepting supply.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**

sources (a) or (b) in the country/region. **iv.** The country is covered by UN, EU or national government sanctions restricting the export/import of such forest and tree based products		**Transparency International:** *CPI Index for Australia*	Annual Sub-supplier audits of Sawmill Chip suppliers **Visy does not accept supply where compliance cannot be demonstrated**.	
b. Activities where the capability of forests to produce a range of wood and non-wood forest products and services on a sustainable basis is not maintained or harvesting levels exceed a rate that can be sustained in the long term. i. According to publicly available data, such as FAO Forest Resource Assessments, the amount of annual harvest of industrial roundwood exceeds the amount of annual increment of growing stock of the country/region of origin.	Supplier, state, country	*Australia's State of the Forests Report 2023* *1.1a.i Forest area by forest type (2023) - DAFF (agriculture.gov.au)* *FAO Global Forest Resources Assessment 2025*	According to Australia's "State of the forests" report for 2023, published by The Department of Agriculture, more than half (58%) of Australia's plantation forests are exotic softwood species (predominantly radiata pine) and is commercially and environmentally managed in the area of supply. FAO Global Forest Resources Assessment 2025 reports for Australia "annual net forest losses of 167 000 ha in 1990–2000 and 26 700 ha in 2000–2015 but an annual net gain of 105 000 ha in 2015–2025" Documents, including contractual agreements and self-declarations.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** Negligible

c. ***Activities where forest management does not contribute to the maintenance, conservation or enhancement of biodiversity on landscape, ecosystem, species or genetic levels.*** **d.** **Activities where ecologically important forest areas are not identified, protected, conserved or set aside.** **i.** The Environmental Performance Index (EPI) 5 score for "Biodiversity & Habitat" of the country is lower than 50. Where no EPI index exists for a certain country, other indicators may be utilised, such as legislation addressing controversial sources elements c and d, combined with evidence of reliable enforcement of legislation (TI CPI score > 50, or WJP Rule of Law score > 0.5).	Supplier, state, country	**State based Legislation and Codes of Practice for Forestry** **NSW & ACT:** *Plantation and Reafforestation Act 1999* *Plantation and Reafforestation (Code) Regulation 2001*. *Forestry Act 2012* *Forest Practices Code (NSW)* *ACT Code of Forest Practice 2005* **VIC:** *Code of Practice for Timber Production 2014 (as amended 2022)* *Planning and Environment Act 1987* **South Australia:** *Forestry Act 1950* *Forestry Regulations 2013* **National:** *Illegal Logging and Prohibition Act (2012)* *Australia's State of the Forests Report 2023* *1.1a.i Forest area by forest type (2023) - DAFF (agriculture.gov.au)* **EPI** *Australia 2024*	Considered 'Low Risk' – Nepcon Timber Legality Risk Assessment – Australia (2017) for all wood sourcing within Australia except Sandalwood. Australia's EPI score for 2024 for Biodiversity and Habitat was 55.2/100 and is currently ranked 23rd in the world for overall Environmental Performance. Harvest Plans are provided by Visy's **uncertified** pulplog suppliers. These are reviewed for compliance prior to accepting supply. Annual Sub-supplier audits of Sawmill Chip suppliers **Visy does not accept supply where compliance cannot be demonstrated**.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**

e. Activities where forest conversions occur, in other than justified circumstances where the conversion: **i.** is in compliance with national and regional policy and legislation applicable for land use and forest management; and **ii.** does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and **iii.** does not destroy areas of significantly high carbon stock; and **iv.** makes a contribution to long-term conservation, economic, and/or social benefits **v.** The country/region has been identified as having had a net loss of forest area > 1% over the most recent ten years of available data, according to publicly available data or information, such as provided by the FAO **vi.** In the country/region the net area with conversions from forests to forest plantations exceeds the forest area increase of the country/region, according to publicly available data or information, such as provided by the FAO.	Country, state, supplier	*https://sourcinghub.preferredbynature.org/* **State based Codes of Practice for Forestry** **NSW & ACT:** *Plantation and Reafforestation Act 1999* *Plantation and Reafforestation (Code) Regulation 2001*. *Forestry Act 2012* *Forest Practices Code (NSW)* *ACT Code of Forest Practice 2005* *Socio-economic impacts of the softwood plantation industry in the South West Slopes and Bombala Region NSW* **VIC:** *Code of Practice for Timber Production 2014 (as amended 2022)* *Planning and Environment Act 1987* *FAO Global Forest Resources Assessment 2025* **SA:** *Forestry Act 1950* *State Specific Guideline for South Australia* *Forest Property Act 2000*	The NSW Department of Industry, Lands and Forestry Division in conjunction with Forest & Wood Products Australia, and the University of Canberra completed a study in 2017 of the Socio-economic impacts of the softwood plantation industry in the South West Slopes and Bombala region, NSW. The study demonstrates that the industry has a positive direct and indirect impact on economic and social benefits. Considered 'Low Risk' – Nepcon Timber Legality Risk Assessment – Australia (2017) for all wood sourcing within Australia except Sandalwood. Existing legislative frameworks exist within NSW, ACT, Victoria and South Australia which aims to discourage through legislative vehicle, the clearing of native land for other use, including plantations. The FAO report 'Global Forests Resource Assessment 2025' reports an increase in forest area in Australia from 2015 – 2025. Documents, including contractual agreements and self-declarations.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**

			Harvest Plans are provided by Visy's **uncertified** pulplog suppliers. These are reviewed for compliance prior to accepting supply. Annual Sub-supplier audits of Sawmill Chip suppliers **Visy does not accept supply where compliance cannot be demonstrated**.	
f. Activities where the spirit of the ILO Declaration on Fundamental Principles and Rights at Work (1998) is not met. **i.** Substantiated studies demonstrate that the ILO Declaration on Fundamental Principles and Rights at Work (1998) is not respected in the country	Country	*Summary of Ratifications for Australia against ILO Conventions* **National** *Fair Work Act 2009*	Australia is a signatory of the International Labour Organizational and has all of the 10 Fundamental Conventions. Australia has current national level legislation, Fair Work Act (2009), which addresses worker's rights within Australia.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**
g. Activities where the spirit of the United Nations Declaration on the Rights of Indigenous Peoples (2007) is not met. **i.** Substantiated studies demonstrate that the spirit of the United Nations Declaration on the Rights of Indigenous Peoples (2007) is not met in the country		**Australia has applied the principles of the ILO through numerous National Standards; reference:** *ILO Summary - Australia* **Indigenous cultural heritage is managed through state based agencies and state based regulations and legislation.** *The National Indigenous Forestry Strategy 2005.*	There is no evidence of any violations of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in forest areas of district concerned in Australia. Harvest Plans are provided by Visy's uncertified pulplog suppliers. Any culturally significant sites are reviewed	Likelihood at origin level = **low** Likelihood at supply chain level = **low**

		AHIMS Register used to identify cultural sites: *Aboriginal Heritage Information Management System (AHIMS)* **New Zealand:** *The Treaty of Waitangi 1975*	and included as a prescription on the Harvest Plan. Annual Sub-supplier audits of Sawmill Chip suppliers **Visy does not accept supply where compliance cannot be demonstrated**.	**Negligible**
h. Conflict timber. **i.** The country/region has a prevalence of armed conflict according to publicly available data sources such as Fragile State List.	Country	**National** *Illegal Logging and Prohibition Act (2012)* **Transparency International** *CPI Index for Australia*	There is no evidence that Australian timber industry is subject to armed conflict. According to Transparency International Australia's 2025 CPI was 76/100.	Likelihood at origin level = **low** Likelihood at supply chain level = low **Negligible**
i. Genetically modified trees. **i.** According to publicly available data genetically modified forest and tree based organisms are produced in the country/region and placed on the commercial market.	Country	**National** *Gene Technology Act 2000*	Australia legislation requires the maintenance of a publicly available register of genetically modified organisms (GMOs). The register does not indicate that any GMO Pinus species have received approvals for release in Australia. *See here*.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**

Visy has determined that there is a 'negligible' risk that any pulplog or woodchip products supplied to Visy are from controversial sources

Controlled Sources – Risk mitigation (supply chain)

Table 6– Controlled Sources Risk mitigation

PEFC indicator	Scale of assessment	Justification	Risk level
a. **Countries/regions where the products have been traded are unknown.**	Country, state and supplier	The Australian softwood industry and state jurisdictions have in place strong legislative, regulatory (generally in the form of Forest Practices Codes) instruments which are used both to guide and enforce the application of legal requirements for forest operations and timber harvesting (for public and private forests and plantations). Code violations are relatively rare and not normally on a scale envisaged to encompass illegal logging. However, serious, knowing, or continuing breaches of the code can constitute contravention of the law. **State authority's records of forest audits -** Australian forestry is managed through national and state legislation as well as staff monitoring compliance with and to enforce forest acts and regulations. All forest codes of practice are audited by the relevant state or territory. No evidence of illegal logging in Australian softwood plantations. Department of Agriculture is conducting compliance audits against the *Illegal Logging Prohibition Act* (2012) for locally procured and imported timber products. Documents, including contractual agreements and self-declarations.	Likelihood at origin level = **low** Likelihood at supply chain level = **low** **Negligible**

b.	**Species in the product are unknown.**	Country, state and supplier	Species information is captured on all delivery documentation to the Tumut Mill and sub-suppliers to the mill. Audits are conducted annually for the purposed of confirming species information and risk of mixing of controversial sources. All large pulplog and sawmill chip suppliers have a signed declaration requiring notification to Visy in the event of changes to factors that may affect Visy's current assessment of risk. Documents, including contractual agreements and self-declarations. Visy's Pulp Mill is designed to only process pinus species.	Likelihood at supply chain level = **low** **Negligible**
c.	**Evidence of illegal practices concerning controversial sources by any company in the supply chain.**	Country, state and supplier	Annual on-site audits are conducted by the Visy representative to determine the effectiveness of systems implemented to reduce the risk of mixing at the sawmill Chip supplying site. The audit includes a review of delivery documentation and invoices.	Likelihood at supply chain level = **low** **Negligible**

Visy has determined that there is a 'negligible' risk of mixing throughout the supply chain for all suppliers and in line with the requirement of the Visy Due Diligence Process (PROC-VPP-FSC-004). The prescribed control measures will be implemented by Visy.

Contact information

If you have any concerns or questions regarding this risk summary or Visy's Due Diligence System, please contact Visy's representative:

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Risk assessment revision table

Issue no	Date	Changes	Approved
1	September 2010	Creation of document	FSC Administrator and Fibre and Forestry Manager
2	22 November 2012	Reviewed and updated evidence of compliance, removed FSC controlled wood indicators, document include PEFC indicators only.	FSC Administrator and Fibre and Forestry Manager
3	6 November 2013	Reviewed in line with new PEFC definition for Controversial Sources from updated standard PEFC ST 2002:2013	FSC Administrator and Fibre and Forestry Manager
4	8 January 2015	Reviewed. Updated relevant references for evidential purposes.	FSC Administrator and Fibre and Forestry Manager
5	5 January 2016	Reviewed. Updated relevant references for evidential purposes. Update to include requirements of the Illegal Logging a Prohibition Act.	FSC/PEFC Administrator and Fibre and Forestry Manager
6	26 September 2016	Reviewed. Updated to include new fibre supply from New Zealand. Sources/references and links have been verified and updated where required.	Visy Certificate Manager and Tumut Fibre and Forestry Manager
7	January 2018	Reviewed Risk Scores and links. New pulp suppliers added to the final version.	Visy Certificate Manager and Tumut Fibre and Forestry Manager
8	January 2019	Reviewed Risk Scores and evidence. New legislation added; Modern Slavery Act No 30 (2018). New pulp suppliers added to the final version.	Manager – Forestry and Fibre Compliance, Tumut Fibre and Forestry Manager
9	December 2019	Reviewed Risk scores, and addition of processes for the inclusion of Controlled Sources.	Manager – Forestry and Fibre Compliance
10	May 2021	Reviewed risk scores. Risk assessment updated to meet the requirements of *Chain of Custody for Forest Based Products PEFC ST 2002:2020.*	Manager – Forestry and Fibre Compliance

11	November 2022	Reviewed risk scores. Updated Bleached Pulp Supplier details. Updated to include South Australian sources	Program Manager – Fibre Stewardship
12	June 2023	Reviewed risk score. Updated Bleached Pulp Supplier details. Updated hyperlinks to sources.	Program Manager – Fibre Stewardship
13	March 2024	Reviewed risk scores. Updated Bleached Pulp Supplier details. Updated hyperlinks to sources.	Program Manager – Fibre Stewardship
14	February 2025	Reviewed risk scores. Updated Bleached Pulp Supplier details. Updated hyperlinks to sources	Program Manager – Fibre Stewardship
15	March 2026	Reviewed risk scores. Updated Bleached Pulp Supplier details. Updated hyperlinks to sources. Minor updates to formatting	Program Manager – Fibre Stewardship
16	October 2026	Reviewed risk scores, addition of risk assessment table for Bleached Pulp. Changes to layout and formatting.	Program Manager – Fibre Stewardship