

Controlled Wood Risk Assessment and Mitigation Plan

2026-2027

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Visy is a global leader in packaging and resource recovery. Our innovation, manufacturing and logistic capabilities are organised around an integrated closed loop and include paper, primary packaging, fibre packaging, packaging supplies and consumables, point of sale displays, automation, materials handling, logistics and recycling. Together, they give life to tailored solutions that deliver enduring value for our customers.

About this report

Intent

To assess the risk of procuring softwood fibre used at Visy Pulp and Paper Tumut for the manufacture of paper products from unacceptable sources.

The geographical origin and the complexity of the supply chain will both be assessed.

The Due Diligence, Risk and Mitigation is documented and aligned with *FSC-STD-40-005 V3-1 Requirements for Sourcing FSC Controlled Wood, FSC HCV Evaluation Framework* and application of a Due Diligence System for compliance with the *Illegal Logging Prohibition Act 2012* (Cth).

Why?

To avoid sourcing from unacceptable sources ("FSC Controlled Wood Categories") which may include illegally harvested wood, wood harvested in violation of traditional and human rights, wood harvested in forests where high conservation values are threatened by management activities, wood harvested in forests being converted to plantations or non-forest use, or wood from forests in which genetically modified trees are planted.

To implement a system of recognition for verification of the origin of wood or other forest products procured directly from forestry operations or supplied by primary processors in the form of wood residues.

How?

1. Visy's Fibre & Forestry Manager and Program Manager – Fibre Stewardship will complete a review of every current and new fibre supplier and new supply area.
2. Mitigation measures will be implemented by Visy for suppliers or supply areas classified as 'non-negligible risk' for supply of wood and wood products from unacceptable sources. The definition of unacceptable sources is as described by FSC Controlled Wood standard FSC-STD-40-005.
3. Visy will undertake a threat assessment* of management activities on identified HCVs
4. Mitigation measures will be implemented by Visy for suppliers or supply areas classified as 'non-negligible' for risk of mixing in the supply chain.
5. The risk assessment and established mitigation measures will be communicated to Visy's stakeholders and feedback sought.
6. Outcomes of mitigation measures and stakeholder communications will be shared publicly where permission is given.
7. The due diligence system, risk assessment and mitigation plans will be reviewed and updated at least annually and whenever changes have occurred that may affect the relevance, effectiveness or adequacy of the DDS.
8. Visy's due diligence system is verified annually by its certifying body. The certification body, and Accreditation Services International are granted access to evidence of conformity with applicable requirements of the FSC Controlled Wood standard (FSC-STD-40-005) including access to documents, sites, premises of suppliers and sub-suppliers, and supply units, where relevant.

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 natural environment from where the material is sourced."

Business

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



Risk assessment scope

Table 1 - Visy Pulp and Paper FSC Controlled Wood certification details

Company Name	Visy Pulp and Paper Pty Ltd - Tumut Mill		
Company Address	1302 Snowy Mountains Hwy, Tumut NSW 2720		
Chain of Custody No	SCS-COC-002636	Controlled Wood Code	SCS-CW-002636
Certification Body	SCS Global Services		
Scope of the Assessment	Pulp logs and Sawmill chip procured from Ecoregion: Temperate grasslands, Temperate Broadleaf and Mixed Forest, Montane Grasslands and Shrublands & Mediterranean Forests for the purposes of Kraft paper manufacturing at Visy Pulp and Paper – Tumut Mill.		

Abbreviations

HCV – High Conservation Values

SIR – Scale Intensity and Risk

FSC – Forest Stewardship Council

NRA – National Risk Assessment

THP – Timber Harvest Plan

Visy – refers to Visy Pulp and Paper Pty Ltd
1302 Snowy Mountains Hwy, Tumut, NSW

LALC – Local Aboriginal Land Council(s)

SSP – Site Safety Plan

BAI – Best Available information

FSC Controlled Wood categories

1. Illegally harvested wood
2. Wood harvested in violation of traditional or human rights
3. Wood harvested from forest in which high conservation values are threatened by management activities
4. Wood harvested from forests being converted to plantations or non-forests uses
5. Wood from forests in which genetically modified trees are planted

Wood supply summary

The origin of supply for softwood pulplogs and sawmill chip is categorised below using local council boundaries as the geographic reference.

During 2026-2027, Visy plans to source plantation-grown softwood logs and sawmill chips from plantation- grown timber from various suppliers throughout the ACT, NSW (including from the local government areas of Bathurst, Bathurst Regional, Cabonne, Goulburn Mulwaree, Greater Hume, Gundagai, Lithgow, Lithgow City, Oberon, Queanbeyan-Palerang, Snowy Monaro, Snowy Valleys, Tamworth Regional, Upper Lachlan, Wagga Wagga, Walcha, Wingecarribee and Yass Valley), Victoria (including from the local government areas of Alpine, Ararat, Benalla, Colac Otway, East Gippsland, Glenelg, Golden Plains, Indigo, Mansfield, Mitchell, Moorabool, Moyne, Murrindindi, Pyrenees, Southern Grampians, Strathbogie, Towong, Wangaratta and West Wimmera) and South Australia (Grant and Wattle Range local government areas).

NOTES:

- *All wood supply is softwood from plantation origin.*
- *No native timbers are used.*
- *Visy does not source from any forest resources that are owned or managed by Visy or its associates.*

Ecoregion and category



Plantation sources to Visy Pulp and Paper originate from:

Ecoregion Category[1]:

1. Temperate Grasslands, Savannas and Shrublands
2. Temperate Broadleaf and Mixed Forest
3. Montane Grasslands and Shrublands
4. Mediterranean Forests, Woodlands and Scrub

Visy obtains fibre from two different types of suppliers:

1. Pulplog Suppliers; both standard scale, intensity and risk (SIR) and low SIR
2. Sawmill (chip) Suppliers (or “Sawmills”)

Pulplog suppliers to Visy may have multiple plantations across a large area and supply Visy with wood fibre in the form of pulp wood (whole logs and/or chip). These suppliers have systems and resources in place to ensure that all wood fibre supplied from their harvest operations is assessed for a number of risk indicators and managed responsibly.

Large suppliers have documented policies and procedures for gathering data on all High Conservation Values (HCV) risks relevant to the plantations they manage and/or own and generate their own harvest plans with required prescriptions for the protection of identified HCVs. Visy’s pulplog suppliers have a long history of compliance with legislative frameworks for each state of operation, as well as compliance with forestry management codes of practice above beyond the requirements of such legislation. These suppliers are classified as standard Scale Intensity and Risk (SIR) operations or low SIR for the purposes of this risk assessment. To qualify as low SIR, the wood source must be plantation only and be sourced from a supply area smaller than 1000ha or a where annual harvest is less than 5000 m3/per annum [2]. They generally supply small volumes of pulplogs, which may form a regular supply, be intermittent, or fulfil a ‘one off’ supply agreement.

Visy has dedicated, qualified foresters, either directly employed or contracted to Visy, to oversee the assessment and responsible management of these smaller suppliers. This includes reviewing the harvest plan, including prescriptions for identified HCVs. On-site monitoring may be conducted by Visy’s qualified foresters to ensure compliance with the THP. A formal in-field verification is conducted for each low SIR supplier annually, with additional in-field verification audits triggered by the presence of HCV’s in the supply area or by a complaint concerning forest management activities in the supply area. Records of all on-site inspections are retained and assessed by Visy’s third-party certification body (if required).

Sawmill (chip) Suppliers supply softwood chips to Visy. These sawmills are supplied with sawlogs by generally the same suppliers that supply pulplogs to Visy. To ensure the accuracy of this claim, Visy will undertake periodic review of the sawmill supplier list and conduct an annual on-site audit of the sawmills. In order to identify the origin of the sawlogs and determine the area with a homogeneous risk designation for each controlled wood category in this risk assessment, Visy receives, in addition to the information collected during the audit, an annual declaration from each sawmill chip supplier which includes details of each sawlog supplying the sawmill, the origin and tree species of the sawlogs and information regarding the risk of mixing in the supply chain.

Where Visy is notified of additional suppliers of sawlog to the sawmill supplying Visy, a review of sawmill due diligence for those suppliers is performed. Additional verification may occur if required, at the discretion of Visy Fibre & Forestry Manager. During the annual audit, a Visy representative will review delivery dockets and invoices. Additionally, the site is assessed for their ability to maintain records and operate an effective management system for qualifying wood suppliers.

(1) Source: Terrestrial Ecoregions in Australia Map; Australian Government Department of Climate Change, Energy, the Environment and Water
(2) FSC_NRA-AU_HCV_AF_V2-0 HIGH CONSERVATION VALUES (HCVS) EVALUATION FRAMEWORK, FSC Australia, Version 2-0, August 2021

Risk of sourcing fibre from unacceptable sources

The *National Risk Assessment (NRA) for Australia (FSC-NRA-AU V(2-0))* has been used to assist Visy to determine risk of sourcing virgin fibre from unacceptable sources. It is comprised of 5 controlled wood categories:

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

The FSC Australia Controlled Wood Risk Assessment has adopted a number of assessment scales to ensure that the 'negligible' or 'non-negligible' risk can be applied at a national, state, bioregional or forestry type level.

The assessment indicates a nominated risk designation for softwood plantations within NSW, ACT and Victoria as 'Negligible' for controlled wood categories 1, 2, and 5 for the relevant supply areas to Visy (Australia – NSW, Victoria, ACT, South Australia). A risk designation of 'Non-negligible Risk' applies for controlled wood category 3 (HCVs 4 and 6) and controlled wood category 4.

As HCVs 4 and 6 exist in Softwood Plantations in all sourcing areas, Visy must assess and mitigate the risk by ensuring Visy's suppliers have a strong system in place at that supply level for the preservation of these HCVs.

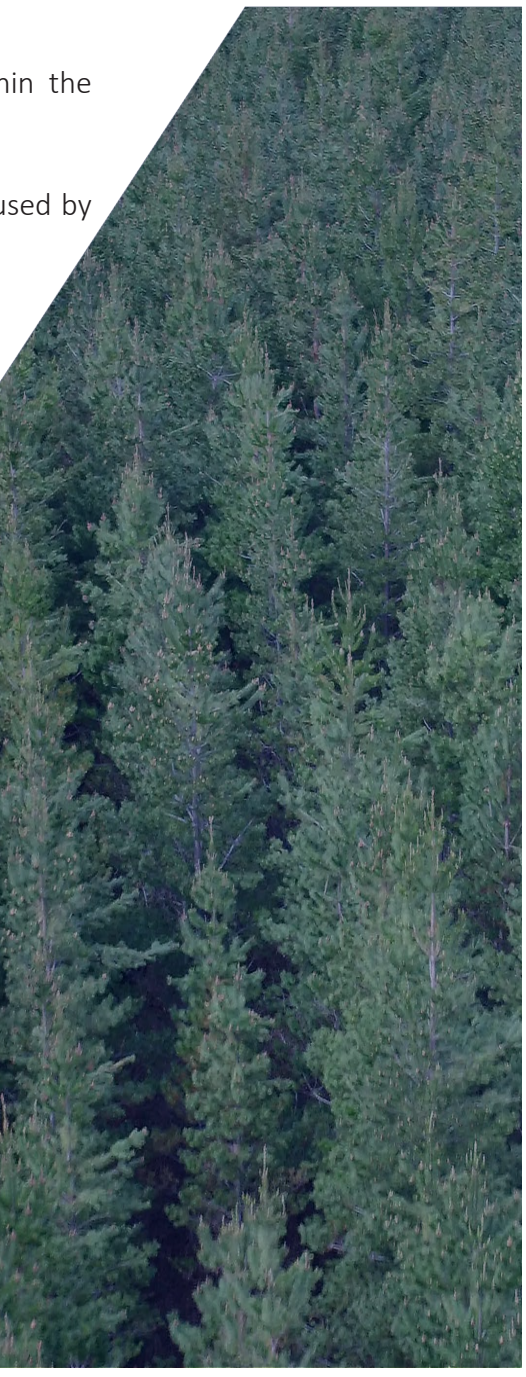
Visy has used the *FSC Australia High Conservation Values Evaluation Framework* as well as *Annex E* of the *FSC-STD-40-005 Requirements for Sourcing FSC Controlled Wood v3-1*, in the development of mitigation measures to ensure Visy's suppliers use the appropriate tools to assess the presence of HCVs and manage these appropriately.

FSC Australia risk assessment

Visy has conducted a risk assessment and mitigation process based on the Origin and Supply Chain risk of accepting unacceptable sources against the relevant, specified HCVs.

A summary of potential risks associated with the conversion of forest to plantation or non-forest use, within the geographical origin of supply, is stated below. See table 4.

The FSC Australia Risk Assessment summarises the risk assessment and sets out the risks in the supply regions used by Visy, this involves only 2 categories of controlled wood.



Threat Assessment on identified HCVs

Where a supply area is identified as including areas of forest that provide protection from flooding, provide protection from erosion, provide barriers to the spread of destructive fires or may impact clean water catchments, Visy will ensure that a threat assessment has been conducted for the forest management activities in that supply area.

This will be done by:

- Confirming that the supplier has conducted such a threat assessment considering management activities and other causes
- Reviewing the supplier threat assessment to ensure that it is adequate
- Where there is a high risk or history of issues related to the HCVs, confirming that additional management measures have been considered.

Ensuring that control measures have been identified and implemented to control the threat

Table 2 – Desired outcomes for control measures

Mitigation Measures	Desired Outcomes
Visy conducts a supplier approval process for all pulplog suppliers.	Visy's fibre sourcing team conducts a supplier approval process to ensure that all suppliers have sufficient management systems in place. These management systems shall comprehensively meet the requirements for identification, assessment and protection of HCVs. Organisational policies, procedures and capabilities will also be reviewed by Visy prior to acceptance of the supplier. Visy's qualified forest team will work with suppliers who do not meet our minimum requirements to ensure HCVs are being managed effectively and provide ongoing support and assessment as required. Suppliers who are unable to meet minimum requirements will be rejected.
Visy's Standard SIR pulplog suppliers who are not FSC FM or FSC CW certified shall participate in an annual audit of their HCV identification and management systems, including confirmation that 'best available information' (BAI) is used in the assessment process. Additionally, in-field audits may also be conducted to review application at an operational level.	Visy will review and confirm that Standard SIR pulplog suppliers who do not have current FSC FM or CW Certification have comprehensive management systems in place to identify and appropriately manage the presence of HCVs in all plantations, harvest and roading areas. Procedures shall be reviewed on the effectiveness of identifying HCVs and recording this on THPs, datasets and GIS layers. Adherence to Environmental Management plans will also be reviewed. An audit tool has been established to identify key performance indicators. The supplier will be required to demonstrate that: • designated staff creating timber harvest plans (THPs) are competent in searching and assessing the data related to HCVs • field supervisors are competent in managing HCVs as per THP prescriptions The process for completing THPs and applying prescriptions (where applicable) will be reviewed for effectiveness. Part of this assessment may be completed in field. The process for identifying, engaging and managing stakeholder feedback will be reviewed for effectiveness. The audit aims to ensure HCVs are appropriately identified and managed by the Standard SIR pulplog supplier and that these processes are reflected on the ground.
For Low SIR suppliers, Visy will review timber harvest plans (THPs) for each supply area and conduct in-field audits annually and/or when HCVs are identified in the THP.	Visy has dedicated, qualified foresters, either directly employed or contracted to Visy, to review and assess these smaller suppliers. This includes reviewing the harvest plan, to ensure that Best Available Information (BAI) has been used to identify any HCVs that may be present in the harvest are and that appropriate prescriptions for identified HCVs are included. Additionally, regular on-site monitoring may be conducted to ensure compliance with the THP. A formal in-field verification is conducted for each low SIR supplier annually and/or when a specific HCV is identified within a harvest area. Records of all on-site inspections are retained and assessed by Visy's third-party certification body (if required). The in-field audit aims to ensure HCVs are appropriately managed for the Scale, Risk and Intensity of the operations and of the supply into Visy.
Visy will engage with interested and affected stakeholders at least annually on the effectiveness of mitigation measures unless a significant change to risk occurs between scheduled annual engagements, in which case the engagement will occur as soon as possible after such change occurs.	Interested and affected stakeholders will be given the opportunity to review Visy's assessment of the risk and proposed mitigation plan and provide additional information on the presence and management of HCVs. Registered stakeholders will be contacted annually unless there are changes to risk. Feedback will be considered and where practicable, comments taken into consideration in the preparation of harvest plans and risk designation for the relevant HCV. Visy shall work with the stakeholders to implement effective control measures based on fluid communication towards a desired outcome for both parties. In addition to Visy's stakeholder engagement, Visy will review the effectiveness of supplier stakeholder engagement processes for standard SIR suppliers during the annual desktop audit and for low SIR suppliers during the review of the THP and annual in-field verification audit.

Mitigation Measures	Desired Outcomes
Pulplog suppliers conduct regular operational monitoring. Management prescriptions as stated in the THP are reviewed for compliance and adequacy by the supplier. This process will be reviewed during the annual audit.	Pulplog suppliers have a regular internal monitoring process of current operations. These visits aim to review the activities of operators including adherence to the prescriptions outlined in the THP and Site Safety Plan (SSP). In some instances these are conducted as third party audits for impartiality. The frequency and content of these internal audits will be reviewed by Visy during the annual systems audit. This will also include the process for identifying, recording and rectifying any non-conformances. Consistent compliance with the THP and Site Safety Plan demonstrates a strong system of conformance.
For small suppliers (Low SIR), Visy verifies that conversion has not occurred since December 1994 as part of the review of the Timber Harvest Plan (THP) prior to accepting supply. For Standard SIR suppliers, Visy verifies during the annual audit that no plantations converted from natural forest since December 1994 will be included in the Visy supply area. Standard SIR suppliers also complete an annual declaration that include consideration of conversion. For Sawmill chip, Visy conducts annual audits and verifies that the Sawmill has processes in place to ensure that none of the woodchip supplied to Visy has come from and plantation converted from natural forest since 1 December 1994. Sawmill chip suppliers also complete an annual declaration that includes consideration of conversion. Visy's Tumut mill is configured to only pulp exotic Pinus species.	Visy has controls in place to ensure that no wood fibre is source from Australian native or natural forests. Visy's Tumut pulp mill is configured to process wood fibre from only Pinus species. A change to species would cause considerable interruptions to the mill production and chip quality. Only plantations that have not been converted since 1 December 1994 are considered for supply to Visy. Low SIR suppliers must include in their harvest plan evidence that the plantation was not converted from natural forest after 1 December 1994. Standard SIR suppliers must demonstrate during their annual audit that no plantations from which they are supplying Visy were converted from natural forest after 1 December 1994. Standard SIR suppliers also make an annual declaration that they are not supplying pulplog to Visy from converted plantations. Sawmill chip suppliers must demonstrate during their annual audit that they have controls in place to ensure that none of the sawlog they are receiving is from plantations converted after 1 December 1994 OR that they have controls in place to segregate any timber from converted plantations and prevent the chips from that sawlog being sold to Visy. Sawmill suppliers also make an annual declaration that they are not supplying woodchip to Visy from converted plantations.
Supply will be rejected if a non-negligible risk is identified and appropriate control measures have not been applied.	Visy will not accept any wood fibre where there is a non-negligible risk that it has come from unacceptable sources including: • Illegally harvested wood; • Wood harvested in violation of traditional and human rights; • Wood from forests in which high conservation values are threatened by management activities; • Wood from forests being converted to plantations and non-forest use; and • Wood from forests in which genetically modified trees are planted.

Relevant Controlled Wood categories

Table 3 – FSC Australia assessment - Controlled wood categories relevant to Visy supply

Controlled Wood Category	Findings and Resources	Risk Level
3.4 Basic ecosystem services* in critical situations*, including protection* of water catchments and control of erosion of vulnerable soils and slopes.	Info on IBRA bioregions found at: www.environment.gov.au/land/nrs/science/ibra along with the specified areas protected under the National Reserve System. Evidence of areas of protection exist in the Eco-regions and Bioregions of relevance. 89 Bioregions now exist throughout Australia as per Interim Biogeographic Regionalisation for Australia, Version 7.1 (2025). The Controlled Wood National Risk Assessment for Australia identifies that there may still be a threat of management activities within all Bioregions on HCV 4. The scale of assessment for HCV 4 is plantations in All States and Territories.	☐ Negligible Risk ☑ Non-negligible Risk
3.6 Sites, resources, habitats* and landscapes* of global or national cultural, archaeological or historical significance, and/ or of critical* cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities* or Indigenous Peoples*, identified through engagement* with these local communities* or Indigenous Peoples*.	The Controlled Wood National Risk Assessment for Australia documents the unlikelihood that all areas of significance have been identified across all plantations in all states and territories. As a result, information on the location of sites of significance may not be accurately mapped. Additionally, areas of significance are noted to be present within plantation boundaries within all states and prescriptions must be established. *Environment NSW - Aboriginal cultural heritage* *Victorian Aboriginal Heritage register* *South Australian register of Aboriginal sites and objects*	☐ Negligible Risk ☑ Non-negligible Risk
4. Wood from forests being converted to plantations or non-forest use (since 2010).	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. These include: *Environmental Protection and Assessment Act (1979)* *Plantations and Reafforestation Act 1999 (NSW* *Planning and Environment Act (1987)* *Native Vegetation Act 1991 (SA)*(to be repealed by Sch 5 cl 105 of *Biodiversity Act 2025* when enacted) *ACT Nature Conservation Act 2014 (ACT)*	☐ Negligible Risk ☑ Non-negligible Risk

The risk mitigation processes adopted for the various supplier categories are set out in the sections that follow.

Pulplog supplier – control measures

Table 4 – Risk mitigation process (origin) for standard and low SIR pulplog operations

Controlled Wood Category	Existing Mitigation Measures	Risk Score	Visy's Additional Mitigation Measures	Revised Risk Score
CW Category 3.4 HCV 4 - Critical ecosystem services. Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.	The FSC Australia HCV Evaluation Framework (v2-0) states that suppliers are required to: 1. Consult the Best Available Information to identify relevant datasets and prepare lists and maps of potential HCV accordingly. 2. Consult experts and other knowledgeable stakeholders to identify HCVs. 3. Undertake a threat assessment of management activities on identified HCVs. 4. Identify Mitigation Measures required to maintain identified HCVs 5. Consult stakeholders on assessment and Mitigation Measures. 6. Implement Mitigation Measures. **Mandatory Mitigation Measures** include the adherence of relevant harvesting codes of practice (both voluntary and mandatory). In circumstances where there is high risk of erosion or history of issues related to erosion, additional management measures may be required. **Recommended Management Strategies** to maintain areas identified under HCV 4 may include protection zones, harvest prescriptions, chemical use restrictions, and/or prescriptions for road construction and maintenance.	Non-Negligible	Visy will complete both the Mandatory and Recommended control measures as stated in the High Conservation Evaluation Framework (v2-0). In addition, Visy has implemented the control measures listed below. Visy conducts a supplier approval process for all pulplog suppliers. **Standard SIR pulplog suppliers who are FSC Certified:** For Standard SIR pulplog suppliers who are FSC FM or FSC CW Certified, this risk of the pulplog being sourced from unacceptable sources is negligible. Visy periodically verifies the validity of all suppliers' certification. **Standard SIR pulplog suppliers who are not FSC Certified:** Visy shall conduct an annual audit of the supplier's HCV identification and management systems, including confirmation that 'best available information' is used in the assessment process. This audit shall include a review of the results of any third party audits regarding HCV 4 and is typically conducted at both planning and management levels. In-field audits may also be conducted to review application at an operational level. Where non-conformances have been identified in the Visy audit, in-field audits will be used to verify that there is a negligible risk of pulplog being sourced from unacceptable sources until corrective actions and system improvements have been completed. **Where the risk is not negligible, Visy will refuse to accept the product.**	Negligible

Controlled Wood Category	Existing Mitigation Measures	Risk Score	Visy's Additional Mitigation Measures	Revised Risk Score
CW Category 3.4 HCV 4 - Critical ecosystem services. Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.	The FSC Australia HCV Evaluation Framework (v2-0) states that suppliers are required to: **7.** Consult the Best Available Information to identify relevant datasets and prepare lists and maps of potential HCV accordingly. **8.** Consult experts and other knowledgeable stakeholders to identify HCVs. **9.** Undertake a threat assessment of management activities on identified HCVs. **10.** Identify Mitigation Measures required to maintain identified HCVs **11.** Consult stakeholders on assessment and Mitigation Measures. **12.** Implement Mitigation Measures. **Mandatory Mitigation Measures** include the adherence of relevant harvesting codes of practice (both voluntary and mandatory). In circumstances where there is high risk of erosion or history of issues related to erosion then additional management measures may be required. Harvesting Codes of Practice (both voluntary and mandatory) include: *Timber Harvesting in Softwood Plantations – Forest Practices Code part 1 (NSW)* ACT Code of Forest Practice Code of Practice for Timber Production 2014 as amended 2022 (Victoria). Guidelines for plantation forestry in South Australia **Recommended Management Strategies** to maintain areas identified under HCV 4 may include protection zones, harvest prescriptions, chemical use restrictions, and/or prescriptions for road construction and maintenance. Existing legislative frameworks exist within NSW, Victoria, ACT and South Australia which aim to discourage through legislative vehicle, activities that impact on critical ecosystem services. These include the *Environmental Protection and Assessment Act (1979), Plantations and Reafforestation Act 1999 (NSW), Planning and Environment Act (1987)* and the *Native Vegetation Act 1991 (SA)* and the *ACT Nature Conservation Act 2014 (ACT)*	Non-Negligible	Visy will complete both the Mandatory and Recommended control measures as stated in the High Conservation Evaluation Framework (v2-0 In addition, Visy has implemented the control measures listed below. Visy conducts a supplier approval process for all pulplog suppliers. Pulplog suppliers conduct regular operational monitoring. Management prescriptions as stated in the harvest plan are reviewed for compliance and adequacy by the supplier. This process will be reviewed by Visy during the annual audit. **Standard SIR pulplog suppliers who are FSC Certified:** For Standard SIR pulplog suppliers who are FSC FM or FSC CW Certified, this risk of the pulplog being sourced from unacceptable sources is negligible. Visy periodically verifies the validity of all suppliers certification. **Standard SIR pulplog suppliers who are not FSC Certified:** Visy shall conduct an annual audit of the supplier's HCV identification and management systems, including confirmation that 'best available information' is used in the assessment process and that relevant Harvesting Codes of practice (both voluntary and mandatory) are being complied with. This audit shall include a review of the results of any third party audits regarding HCV 4 and is typically conducted at both planning and management levels. In-field audits may also be conducted to review application at an operational level. Where non-conformances have been identified in the Visy audit, in-field audits will be used to verify that there is a negligible risk of pulplog being sourced from unacceptable sources until corrective actions and system improvements have been completed. Where the risk is not negligible, Visy will refuse to accept supply. **Low SIR suppliers:** Visy has dedicated, qualified foresters, either directly employed or contracted to Visy, to oversee the assessment and responsible management of these smaller suppliers. This includes reviewing the harvest plan, including prescriptions for identified HCVs. Supply will be rejected if a non-neglible risk is identified and appropriate control measures have not been applied. On-site monitoring may be conducted to ensure compliance with the THP. A formal in-field verification is conducted by Visy for each low SIR supplier annually and/or when a specific HCV is	Negligible

Controlled Wood Category	Existing Mitigation Measures	Risk Score	Visy's Additional Mitigation Measures	Revised Risk Score
			identified within a harvest area. In-field verification audits will also be used by Visy to determine whether complaints are substantiated. **Stakeholder Engagement:** Visy will engage with interested and affected stakeholders annually on the effectiveness of control measures unless a significant change to the risk arises between scheduled annual engagements arise, in which case the engagement will occur as soon as possible after such change occurs. Operations managed by Visy contracted harvest crews will be reviewed by Visy's dedicated forester for compliance to harvest and haulage codes of practice and adherence to any specified prescriptions detailed in the THP.	
CW Category 3.4 HCV 4.1 – Areas that provide *protection** from flooding **(Not required for Low SIR)**	**See mandatory and recommended actions from the HCV Evaluation Framework (v2-0).** Existing legislative frameworks exist within NSW, Victoria and South Australia which aim to discourage harvest activities through legislative vehicles, conducted at times that would be detrimental to rainfall run-off. These include: *South Eastern Water Conservation and Drainage Act 1992 (SA)* *Plantations and Reafforestation (Code) Regulations 2001 (NSW)*. Harvesting Codes of Practice (both voluntary and mandatory) include: *Timber Harvesting in Softwood Plantations – Forest Practices Code part 1 (NSW)* ACT Code of Forest Practice Code of Practice for Timber Production 2014 as amended 2022 (Victoria). Guidelines for plantation forestry in South Australia The plantation planning process takes into account the minimisation of issues such as slope, erosion control and water catchment management. Exclusion and buffer zones, seasonal harvest arrangements along with modified roading plans are also additional methods currently used by the suppliers. Visy's largest supplier is Forestry Corporation of NSW (FCNSW). Currently. FCNSW softwood plantations occupy only 1% – 6% of land in any given water catchment area. This area is not considered to cause any measurable	Non-negligible	Visy undertakes the supplier assessments and monitoring as mentioned above (HVC 4), with specific review of the following best available information for HCV 4.1*: 1. Appropriate classification of soil types. 2. Evidence of landscape level planning processes and applicable mapping. 3. Evidence that correct and effective exclusion zones are included during the planning process especially in relation to drainage lines and other waterway classifications. 4. Evidence that operational plans are suited to soil, weather and operational requirements. * reviewed during the audit process	Negligible

Controlled Wood Category	Existing Mitigation Measures	Risk Score	Visy's Additional Mitigation Measures	Revised Risk Score
	impact to water quality within a catchment area (Forest and Wood Products Research and Development Corporation, 2004).			
HCV 4.2 – Areas that provide *protection** from erosion	**See mandatory and recommended actions from the HCV Evaluation Framework (v2-0).** Management of soil and water values involves site specific actions undertaken in each harvest unit to mitigate the impact to the soil and water environments. These requirements are formally audited by the NSW EPA and the NSW DPI in the case of authorised plantations. HVP Plantations are audited by local Victorian Shire Councils, as divulged by EPA (and as stated in the Planning and Environment Act 1987), internally, and by certifying bodies for compliance with FSC and Responsible Wood standards. Legislation governing the protection from activities causing erosion include the *Plantations and Reafforestation Act 1999 (NSW)* and the *Forest Practices Code 2005 (NSW),* the *Code of Practice for Timber Production 2014 (Vic),* the *Native Vegetation Act 1991 (SA)*, The Code of forest practice in South Australia (Guidelines for Plantation Forestry in South Australia, 2009) and the *ACT Nature Conservation Act 2014 (ACT)*.	Non-negligible	Visy undertakes the HCV supplier assessments and monitoring as mentioned above (HVC 4), with specific review of the following best available information for HCV 4.2*: 1. Appropriate classification of soil types. 2. Evidence that correct and effective exclusion zones are included during the planning process especially in relation to drainage lines and other waterway classifications. 3. Appropriate use of remnant vegetation areas to prevent areas at risk of erosion. 4. Evidence that operational plans are suited to soil, weather and operational requirements. * reviewed during the audit process	Negligible
CW Category 3.4 HCV 4.3 – Areas that provide barriers to the spread of destructive fires (Not required for Low SIR)	**See mandatory and recommended actions above from the HCV Evaluation Framework (v2-0).** Fire is addressed in legislative frameworks which govern the requirements of the land manager to take specific steps to ensure effective fire management. NSW – *Plantations and Reafforestation (Code) Regulations 2001, Forest Practices Code 2005 (NSW)* South Australia - *Fire and Emergency Services Act 2005, The Code of forest practice in South Australia (Guidelines for Plantation Forestry in South Australia, 2009)* Victoria – *The Forests Act 1958, Code of Practice for Timber Production 2014 (Vic)* The 2020 Royal Commission into National Natural Disaster Arrangements will also guide activities impacting on HCVs as a result of destructive fires. The report can be accessed here.	Non-negligible	Visy undertakes the HCV supplier assessments and monitoring as mentioned above (HVC 4), with specific review of the following best available information for HCV 4.3*: 1. Review of fire management plan annually and the evaluation of its effectiveness with a specific focus on preventative measures. 2. Identified HCV areas and relevant fire management plans specific to the protection of these HCVs. 3. Consideration of the landscape level approach to fire management. * reviewed during the audit process	Negligible

Controlled Wood Category	Existing Mitigation Measures	Risk Score	Visy's Additional Mitigation Measures	Revised Risk Score
CW Category 3.4 HCV 4.4 – Areas that provide clean water catchments (Not required for Low SIR)	**See mandatory and recommended actions above from the HCV Evaluation Framework (v2-0).** Management of water catchment impacts requires a landscape level assessment of areas that may impact water catchments and site specific actions undertaken in each harvest unit to mitigate the impact to these catchments. Existing legislative vehicles apply to the management of forestry operations on water catchments. Within NSW: *Plantations and Reafforestation (Code) Regulation*. Adherence to this legislation is monitored by the NSW Department of Primary Industries. Additionally, the Forestry Corporation of NSW (FCNSW) *Forest Practices Code (2005)* is adhered to by FCNSW and widely used voluntarily by all Standard SIR and Low SIR suppliers to Visy. Within Victoria: *Soil Conservation and Land Utilization Act, 1958, Land Conservation Act, 1970, Code of Practice for Timber Production 2014 (Vic)* *www.data.vic.gov.au/data/dataset/designated-water-supply-catchments*	Non-negligible	Visy undertakes the supplier assessments and monitoring as mentioned above (HVC 4), with specific review of the following best available information for HCV 4.4*: 1. Appropriate timing of forestry activities including spraying and harvesting. 2. Evidence of a well-integrated and well-implemented water monitoring system for areas within clean water catchment zones. 3. Evidence that correct and effective exclusion zones are included during the planning process especially in relation to drainage lines and other waterway classifications. 4. Appropriate use of remnant vegetation areas to prevent areas at risk of erosion. 5. Operational plans suited to soil, weather and operational requirements. * reviewed during the audit process	Negligible
CW Category 3.6 HCV 6 – Cultural values Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/ sacred importance for the traditional cultures of local communities or Indigenous Peoples, identified through engagement with these local communities or Indigenous Peoples.	Recommended control measure as stated in the HCV Evaluation Framework (v2-0) include: Management strategies and actions shall aim to maintain HCV Areas* identified under HCV 6 may include protection* zones; target-based protections; landscape*-scale* protections*; harvest exclusions, and/or retention in harvest areas. Mandatory Control Measures as stated in the HCV Evaluation Framework (v2-0): Measures for maintaining Indigenous cultural values shall be agreed to with the Indigenous Peoples* connected to* the Management unit*, and/or as directed by state and national laws*. State registered site identifications are used by the Forest Manager to manage areas of significance during the planning process – confirmed during annual systems audit for standard SIR suppliers and during review of harvest for low SIR supplier. Additionally, local knowledge and internal inventories may be used to identify	Non-negligible	Visy conducts a supplier approval process for all new pulplog suppliers. **Standard SIR Suppliers:** Visy's Standard SIR pulplog suppliers who are not FSC FM or FSC CW Certified shall participate in an annual audit of their HCV identification and management systems, including confirmation that 'best available information' is used in the assessment process, such as inclusion of appropriate indigenous representatives in their stakeholder engagement and/or annual consultation with relevant indigenous heritage registers. The audit shall also verify that measures for maintaining Indigenous cultural values have bene agreed to with the Indigenous Peoples connected to the Management unit and/or as directed by state and national laws. This audit shall also include a review of any third-party audits regarding HCV 6. This audit is typically conducted at both a planning and management level. Standard SIR pulplog suppliers conduct regular operational monitoring. Management prescriptions as stated in the harvest plan are reviewed for compliance and adequacy by the supplier. This process will be reviewed during the annual audit.	Negligible

Controlled Wood Category	Existing Mitigation Measures	Risk Score	Visy's Additional Mitigation Measures	Revised Risk Score
	potential values within the harvest area. Some pulplog suppliers have established agreements with local Aboriginal groups to identify and advise on local values as well as live GIS layers with recorded values. A public state registry is available for landowners and management to identify sites of cultural and archaeological significance. For Vic: Aboriginal Cultural Heritage Register and Information System (ACHRIS) For NSW: Aboriginal Heritage Information Management System (AHIMS) For South Australia: Taa Wika Register of Aboriginal Sites and Objects, part of the Central Archive For the ACT: ACT Heritage Register		In-field audits may also be conducted to review application at an operational level. Where non-conformances have been identified in the Visy audit, in-field audits will also be used to verify that there is a low risk of pulplog being sourced from unacceptable sources until corrective actions and system improvements have been completed. **Low SIR suppliers:** Visy has dedicated, qualified foresters, either directly employed or contracted to Visy, to oversee the assessment and responsible management of these smaller suppliers. This includes reviewing the harvest plan, including prescriptions for identified HCVs. Supply will be rejected if a non-neglible risk is identified and appropriate control measures have not been applied. On-site monitoring may be conducted to ensure compliance with the THP. A formal in-field verification is conducted by Visy for each low SIR supplier annually and/or when a specific HCV is identified within a harvest area. In-field verification audits will also be used by Visy to determine whether complaints are substantiated. **Stakeholder Engagement:** Visy will engage with interested and affected stakeholders annually on the effectiveness of mitigation measures unless a risk to significant changes between scheduled annual engagements arise, in which case the engagement will occur as soon as possible after such change occurs. Operations managed by Visy contracted harvest crews will be reviewed by Visy's dedicated forester for compliance to harvest and haulage codes of practice and adherence to any specified prescriptions detailed in the THP.	

Controlled Wood Category	Existing Mitigation Measures	Risk Score	Visy's Additional Mitigation Measures	Revised Risk Score
CW Category 3.6 HCV 6.1 – Aesthetic Values **(Not required for Low SIR)**	**See mandatory and recommended actions above from the HCV Evaluation Framework (v2-0).** Australian National Heritage List outlines existing areas of natural significance including UNESCO sites and national parks.	Non-negligible	**Standard SIR Suppliers:** Visy's Standard SIR pulplog suppliers who are not FSC FM or FSC CW Certified shall participate in an annual audit of their HCV identification and management systems with specific review of the following Best Available Information for HCV 6.1*: 1. Evidence that aesthetic values are consider as part of the planning process. 2. Values are included in map layers where identified and included in the THP. 3. Evidence of engagement with stakeholders on values. * reviewed during the audit process **Stakeholder Engagement:** Visy will engage with interested and affected stakeholders annually on the effectiveness of mitigation measures and identification of undocumented HCVs.	Negligible
CW Category 3.6 HCV 6.2 – Historic values of global or national cultural or archaeological significance.	See mandatory and recommended actions above from the HCV Evaluation Framework (v2-0). A public state registry is available for landowners and management to identify sites of cultural and archaeological significance. For Vic: Aboriginal Cultural Heritage Register and Information System (ACHRIS) For NSW: Aboriginal Heritage Information Management System (AHIMS) For South Australia: Taa Wika Register of Aboriginal Sites and Objects, part of the Central Archive Australian National Heritage List outlines existing areas of natural significance including UNESCO sites and national parks.	Non-negligible	Visy conducts a supplier approval process for all new pulplog suppliers. **Standard SIR Suppliers:** Visy's Standard SIR pulplog suppliers who are not FSC FM or FSC CW Certified shall participate in an annual audit of their HCV identification and management systems, including confirmation that 'best available information' is used in the assessment process. This audit shall include a review the results of any third-party audits regarding HCV 6. This audit is typically conducted at both a planning and management level. Standard SIR pulplog suppliers conduct regular operational monitoring. Management prescriptions as stated in the harvest plan are reviewed for compliance and adequacy by the supplier. This process will be reviewed during the annual audit. In-field audits may also be conducted to review application at an operational level. Where non-conformances have been identified in the Visy audit, in-field audits will also be used to verify that there is a low risk of pulplog being sourced from unacceptable sources until corrective actions and system improvements have been completed. Where the risk is found to be non-negligible Visy will refuse to accept supply. **Low SIR suppliers:** Visy has dedicated, qualified foresters, either directly employed or contracted to Visy, to oversee the assessment and responsible management of these smaller suppliers. This includes reviewing the harvest plan, including prescriptions for identified HCVs. Supply will be rejected if a non-neglible risk is identified and appropriate control measures have not been	Negligible

Controlled Wood Category	Existing Mitigation Measures	Risk Score	Visy's Additional Mitigation Measures	Revised Risk Score
			applied. On-site monitoring may be conducted to ensure compliance with the THP. A formal in-field verification is conducted by Visy for each low SIR supplier annually and/or when a specific HCV is identified within a harvest area. In-field verification audits will also be used by Visy to determine whether complaints are substantiated. **Stakeholder Engagement:** Visy will engage with interested and affected stakeholders annually on the effectiveness of control measures unless a risk to significant changes between scheduled annual engagements arise, in which case the engagement will occur as soon as possible after such change occurs. Operations managed by Visy contracted harvest crews will be reviewed by Visy's dedicated forester for compliance to harvest and haulage codes of practice and adherence to any specified prescriptions detailed in the THP.	
CW Category 3.6 HCV 6.3 – Long term research sites	See mandatory and recommended actions above from the HCV Evaluation Framework (v2-0). FCNSW, Visy's largest pulplog supplier , funds and engages in a variety of scientific research projects within the forests it manages. More details here.	Non-negligible	**Standard SIR Suppliers:** Visy's Standard SIR pulplog suppliers who are not FSC FM or FSC CW Certified shall participate in an annual audit of their HCV identification and management systems, including confirmation that 'best available information' for HCV 6.3 is used in the assessment process. 1. Identification and management of sites where long-term research is being conducted 2. Evidence that there is timely and meaningful engagement with local aboriginal and other relevant cultural groups	Negligible

Controlled Wood Category	Existing Mitigation Measures	Risk Score	Visy's Additional Mitigation Measures	Revised Risk Score
CW Category 3.6 HCV 6.4 – Social, including economic values (Not required for Low SIR)	See mandatory and recommended actions above from the HCV Evaluation Framework (v2-0). Forest & Wood Products Australia (FWPA) collaborated in 2017-2018 with Canberra Unversity and the NSW Department of Industry, Lands and Forestry Division in completing a study of the Socio-economic impacts of the softwood plantation industry in the South West Slopes and Bombala region, NSW. This publication can be accessed here. Similarly a study of the Socio-economic impacts of the plantation industry in the Green Triangle (South Australia). This publication can be accessed here. Also a study of the Socio-economic impacts of the plantation industry in Victoria (exc the Green Triangle). This publication can be accessed here. In October 2025, the Land Use Review and Comparison Report prepared for the Murray Region Forestry Hub (MRFH) and Central West Forestry Hub, examines the economic, environmental, and social implications of establishing new **environmental plantings (EPs)** and **harvestable timber plantations (TPs)** across NSW and northern Victoria. This publication can be accessed here.	Non-negligible	**Standard SIR Suppliers:** Visy's Standard SIR pulplog suppliers who are not FSC FM or FSC CW Certified shall participate in an annual audit of their HCV identification and management systems. The supplier assessments and monitoring specifically review of the following best available information for HCV 6.4*: 1. Policies and procedures related to discrimination and diversity 2. Evidence that there is timely and meaningful engagement with local cultural groups including recreational users and indigenous groups * reviewed during the audit process **Stakeholder Engagement:** Visy will engage with interested and affected stakeholders annually on the effectiveness of control measures and identification of undocumented HCVs.	Negligible

Controlled Wood Category	Existing Mitigation Measures	Risk Score	Visy's Additional Mitigation Measures	Revised Risk Score
CW Category 3.6 HCV 6.5 – Spiritual and cultural values	See mandatory and recommended actions above from the HCV Evaluation Framework (v2-0). FCNSW, Visy's largest pulplog supplier has, for more than 35 years, had an Aboriginal Partnerships team. The team has worked closely with local aboriginal peoples and Local Aboriginal Land Councils (LALC) to conduct extensive land investigations for inclusion as an 'Aboriginal Place' under the National Parks and Wildlife Act (1974). See further information here. Other suppliers have sound existing relationships with LALC's and liaise regularly. A public state registry is available for landowners and management to identify sites of cultural significance. For Vic: Aboriginal Cultural Heritage Register and Information System (ACHRIS) For NSW: Aboriginal Heritage Information Management System (AHIMS) For South Australia: Taa Wika Register of Aboriginal Sites and Objects, part of the Central Archive	Non-negligible	Visy conducts a supplier approval process for all new pulplog suppliers. **Standard SIR Suppliers:** Visy's Standard SIR pulplog suppliers who are not FSC FM or FSC CW Certified shall participate in an annual audit of their HCV identification and management systems, including confirmation that 'best available information' for HCV 6.5 is used in the assessment process, such as inclusion of appropriate indigenous representatives in their stakeholder engagement and/or annual consultation with relevant indigenous heritage registers. This audit shall include a review the results of any third-party audits regarding HCV 6 and is typically conducted at both a planning and management level. In-field audits may also be conducted to review applications at an operational level. Where non-conformances have been identified in the Visy audit, in-field audits may be used to verify that there is a negligible risk of pulplog being sourced from unacceptable sources until corrective actions and system improvements have been completed. Where the risk is found to be non-negligible, Visy will refuse to accept supply. **Low SIR suppliers:** Visy has dedicated, qualified foresters, either directly employed or contracted to Visy, to oversee the assessment and responsible management of these smaller suppliers. This includes reviewing the harvest plan, including prescriptions for identified HCVs. Supply will be rejected if a non-neglible risk is identified and appropriate control measures have not been applied. On-site monitoring may be conducted to ensure compliance with the THP. A formal in-field verification is conducted by Visy for each low SIR supplier annually and/or when a specific HCV is identified within a harvest area. In-field verification audits will also be used by Visy to determine whether complaints are substantiated. **Stakeholder Engagement:** Visy will engage with interested and affected stakeholders annually on the effectiveness of control measures unless a risk to significant changes between scheduled annual engagements arise, in which case the engagement will occur as soon as possible after such change occurs. Operations managed by Visy contracted harvest crews will be reviewed by Visy's dedicated forester for compliance to harvest and haulage codes of practice and adherence to any specified prescriptions detailed in the THP.	Negligible

Table 5 – Risk mitigation for wood from conversion sources

Controlled Wood Category	Existing Mitigation Measures	Risk Score	Visy's Existing Mitigation Measures	Revised Risk Score
CW Category 4.1 Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses	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. These include: *Environmental Protection and Assessment Act (1979)* *Plantations and Reafforestation Act 1999 (NSW)* *Planning and Environment Act (1987)* *Native Vegetation Act 1991 (SA)* *ACT Nature Conservation Act 2014 (ACT).*	Non-negligible	All of the pulplog and woodchip sourced by Visy for the production of kraft liner are sourced from softwood plantations in NSW, ACT, Victoria and South Australia. Only plantations that have not been converted since 1 December 1994 are considered for supply to Visy. For small suppliers (Low SIR), Visy verifies that conversion has not occurred since December 1994 as part of the review of the Timber Harvest Plan (THP) prior to accepting supply. For Standard SIR suppliers, Visy verifies during the annual audit that no plantations converted from natural forest since December 1994 will be included in the Visy supply area. For Sawmill chip, Visy conducts annual audits and verifies that the Sawmill has processes in place to ensure that none of the woodchip supplied to Visy has come from and plantation converted from natural forest since 1 December 1994. Sawmill chip suppliers also complete an annual declaration that includes consideration of conversion. Visy's Tumut mill is configured to only pulp exotic Pinus species. No timber is sourced from Australian native or natural forests.	Negligible

Supply chain risks and control measures

Summary of the supply chain

- Standard and Low SIR pulplog suppliers deliver whole logs direct to Visy from the plantation source.
- Woodchip generated by in-field woodchipping are supplied directly to Visy Tumut from the plantation.
- Woodchip and reject sawlog from sawmill suppliers are delivered directly to Visy Tumut from the sawmill.
- On occasion sawlog delivered to sawmills may have passed through a transfer yard. This sawlog may subsequently be delivered to Visy from the sawmill as either woodchip or rejected sawlog.
- Pulplog may also be delivered to Visy via a transfer yard.

All pulplog and woodchip suppliers to Visy must have a current, approved supply agreement. Agreements are based on the term, area of supply, tree species, harvesting and haulage arrangements and quantity (green metric tonnes).

Each load of fibre delivered to site has a delivery docket, either electronic or paper, with relevant details such as the supplier name, date of delivery, harvest contractor, haulage contractor, area of supply, forest supply coupe/compartment tonnage and species. Delivery docket and log supply data is maintained in Visy's Weighbridge system. (see also *Visy Pulp and Paper DDS – Process Summary* for further information on this process).

Additional information is received on the supply chain through the establishment and annual review of the agreement, through sighted documentation and on-site visits by a Visy-appointed Forester.

See risk assessment details above for origin.

Pulplog supply chain control measures

Table 6 – Risk mitigation process (supply chain) for large pulplog suppliers

Risk	Risk Defined	Existing Mitigation Measures	Risk Score
Risk of mixing within the supply chain including transport, processing and storage.	Risk that wood may be distributed to a central location prior to arriving at the mill. Risk that wood may be sourced from multiple sources therefore creating a mixed load. Risk that reject sawlogs may be from unacceptable or unknown origin	For low SIR suppliers, or those delivery with paper dockets, each supply coupe/compartment is registered in the weighbridge system by the Fibre and Forestry Manager, including; supplier details, haulage company, location, coupe/compartment number and property name, species, age class and specified haulage route (if applicable). For standard SIR suppliers with electronic docketing, a load identifier code (ID) is defined by the region, haulage rates and the species type. Weighbridge queries are completed with the supplier's database and docket information is populated automatically into Visy's weighbridge system. Each supply arrangement as stated above will have a unique ID. Deliveries cannot be accepted without the specified ID being correctly entered and the registered haulage vehicle being nominated against the correct haulage company. Delivery dockets accompany all deliveries, unless via electronic docketing. Delivery documentation and load reviews are conducted as part of Visy's internal FSC audit process. Evidence is gathered on supply dockets and reconciliation of data. Reject sawlogs are only accepted from Visy's existing sawmill suppliers who have been assessed and verified to only accept controlled material. Therefore there is no risk of uncontrolled material being included in the reject sawlogs from these locations. Visy does not accept uncontrolled wood fibre inputs to be included in the manufacturing process. Where a transfer yard is being used as part of the supply chain, Visy will review suppliers' controls to ensure that there is no risk of product from unacceptable or unknown origin being included. This review is conducted as part of the annual audit or when a change occurs in the supply chain. *(See also Visy Pulp and Paper DDS – Process Summary for further information on this process)*	Negligible

Risk	Risk Defined	Existing Mitigation Measures	Risk Score
Risk that wood is not from the specified area of origin.	Risk that origin has not been assessed prior to the arrival at the mill. Risk that pulplog origin has not been assessed against the Controlled Wood criteria (FSC-STD-40-005).	For low SIR suppliers, or those delivery with paper dockets, Each supply coupe/compartment is registered in the weighbridge system by the Fibre and Forestry Manager, including; supplier details, haulage company, location, coupe/compartment number and property name, species, age class and specified haulage route (if applicable). For standard SIR suppliers with electronic docketing, a load identifier code (ID) is defined by the region, haulage rates and the species type. Weighbridge queries are completed with the supplier's database and docket information is populated automatically into Visy's weighbridge system. Standard SIR pulplog suppliers sign an annual declaration as part of the supply agreement review process declaring the area of origin from which pulplogs to Visy will be supplied and committing to notifying Visy of any changes to the origin, species or supply chain. Low SIR suppliers submit a timber harvest plan to Visy for approval prior to delivery. These timber harvest plans must include evidence of an agreement between the supplier and the landowner. Supply agreements specify the area of sourcing for all pulplogs. Pricing and haulage information is determined prior to any agreement being signed. *(See also Visy Pulp and Paper DDS – Process Summary for further information on this process)*	Negligible

Sawmill chip supply chain control measures

Table 7 – Risk mitigation process (supply chain) for sawmill chip suppliers

Risk	Existing Mitigation Measures	Revised Risk Score
Risk of mixing within the supply chain including transport, processing and storage.	An annual on-site review is conducted by the Visy Representative to determine the effectiveness of systems implemented to reduce the risk of mixing at the Sawmill Chip supplying site. Sawmills supplying chip to Visy are assessed to ensure that there are no uncontrolled wood inputs processed at the site (including reject sawlogs). In addition, all Sawmill 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. Where a new supplier is sought by the Sawmills, Visy will review the due diligence from the sawmill and may conduct its own assessment of the supply using existing audit tools, if the sawmill due diligence is insufficient. Suppliers will be required to meet Visy's minimum requirements, including management of HCV's. Delivery dockets accompany all deliveries to the Sawmill Suppliers which are reviewed during the annual audit. Suppliers to the Sawmills generally also supply pulplogs direct into Visy.	Negligible
Risk that Fibre is not from the specified area of origin.	An annual on-site review is conducted by the Visy Representative to determine the effectiveness of systems implemented to reduce the risk of mixing at the Sawmill Chip supplying site. Delivery dockets accompany all deliveries to the Sawmill suppliers. All suppliers to the Sawmills generally also supply direct into Visy in the form of pulplogs. In addition, all Sawmill 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. Where a new supplier is sought by the Sawmills, Visy will review the due diligence from the sawmill and may conduct its own assessment of the supply using existing audit tools, if the sawmill due diligence is insufficient. Suppliers will be required to meet Visy's minimum requirements, including management of HCV's.	Negligible

Sawmill (chip) suppliers supply softwood chips to the Tumut site. Each load of chips delivered has an accompanying delivery docket, either electronic or paper, with specific details including the sawmill supplier, date of delivery, product delivered and quantity (net weight in green metric tonnes).

Visy shall perform regular checks of the Sawmill suppliers' lists to ensure that these are consistent with those suppliers direct to Visy.

An annual on-site audit shall be conducted to review the information supplied and obtain evidence of compliance.

In addition to the above, Visy Tumut may receive chip from in-field chipping operations, direct from a forest managed by one of Visy's standard SIR pulplog suppliers. This is a Visy-controlled operation. Visy's qualified forester reviews all harvest plans and takes necessary actions to ensure that the operation is in compliance with the minimum standards.



Visy has determined that there is a 'Negligible' risk of mixing throughout the supply chain for all suppliers. The prescribed mitigation measures will be implemented by Visy.

Verification of suppliers using in-field audits

The current Controlled Wood standard FSC-STD-40-005 v3-1 does not provide guidance on sampling for field verification audits. As such, Visy will conduct at least one annual verification of compliance for each low SIR supplier using in-field verification techniques.

Only active or recently active harvesting sites are audited.

In-field audits of standard SIR suppliers may also be conducted to review application at an operational level. Where non-conformances have been identified in the Visy audit, in-field audits may be used to verify that there is a negligible risk of pulplog being sourced from unacceptable sources until corrective actions and system improvements have been completed. Where the risk is non-negligible, Visy will refuse to accept the supply. Visy's Certification Body will review the process for in-field verification during the annual surveillance audit. Visy will take into consideration supplier, size of the operation, and geographic location to ensure the sample process is representative.

Auditor competency

Visy personnel conducting field verification audits have had appropriate training, to ensure sufficient understanding of the FSC Australia HCV framework. Training records are kept for a minimum 5 years.

Visy's auditor for the purposes of conducting field verification is also required to be qualified as a Lead Auditor – Quality, Safety or Environment Management Systems.



Stakeholder engagement

Feedback from Stakeholder engagement:

Visy did not receive feedback or complaints during the 2025-2026 Stakeholder Engagement process regarding management of HCVs within the supply area or the management activities of Visy's suppliers.

Stakeholder engagement 2026-2027:

Visy has developed an extensive stakeholder list including non-government organisations (NGOs), representatives of social and employment groups, government agencies, forest management units, recreational forest uses, local harvest operators, experts (including ecologists) and local indigenous representatives. These stakeholders are selected based on their interest and involvement in the harvesting and plantation management activities and their geographical location relevant to the sourcing areas (Refer to the areas listed on page 8).

Affected stakeholders are engaged and consulted by Visy annually on the mitigation measures contained in this document. Where Visy does not have access to stakeholder information due to privacy reasons, a public notification process may be used and documented.

All documents required for Visy's 2026 consultation will be made available on Visy's website here during this period. Stakeholders will be provided with a minimum of 6 weeks' notice to provide comment prior to Visy's external assessment of the effectiveness of its risk assessment and mitigation measures (this document).

Visy has established a Stakeholder Registration Page for interested and affected stakeholders. Stakeholders can register their interest and receive public documentation on Visy's softwood supply. This enables distribution of important information regarding Visy's fibre sourcing origin, and supply chain changes as well as creating a stakeholder database for those who wish to receive any ongoing information.

To register, please select this link.

In addition, Visy's suppliers will contact affected stakeholders prior to any management activity such as Harvesting, Spraying and Roading.

Affected stakeholders are generally taken to include neighbouring property owners, road users (private and council), recreational forest users and first nations groups.

Where complaints are received and/or issues are identified, these will be considered and investigated by Visy and actions taken as appropriate. Visy will acknowledge receipt of any complaints and will work with the complainant to resolve substantiated concerns. All feedback received is documented and records kept. The stakeholder will be provided with a written explanation of the actions taken to rectify any concerns where substantiated.

Visy complaints process



Visy is committed to ensuring its supply of controlled wood meets all the requirements of the standard *FSC-STD-40-005 Requirements for Sourcing FSC Controlled Wood*.

Visy has a comprehensive internal procedure for managing complaints regarding the legitimacy of its wood fibre supply.

Visy may receive complaints regarding the supply of Controlled Material to Visy from its suppliers or sub-suppliers. These may be in relation to fibre origin or aspects of the supply chain.

Visy's complaints process will operate as follows:

Complaints must be received in writing, addressed to the Program Manager – Fibre Stewardship (refer Contact Details at the end of this document) and should be supported by evidence in order to allow Visy to substantiate the complaint.

Once a complaint is received in the correct format, Visy will, as soon as practicable, formally acknowledge receipt of the complaint,advise the complainant of the complaints process and provide the name and contact details of the Visy representative who shall be responsible for leading the investigation and providing a response.

Where the complaint is made in relation to a Controlled Wood category with a risk designated as 'negligible' (as per the National Risk Assessment for Australia and FSC advice note ADVICE-40-005-27), the complaint shall be forwarded to the relevant FSC regional office and Certifying Body.

Where the complaint is made against a Controlled Wood category that is classified as 'Non-negligible' or the complainant has concerns regarding the adequacy of the mitigation measures the following shall apply:

- The Visy Representative shall review the evidence supplied by the complainant and determine whether the evidence is substantial , applicable to the relevant CW category (as mentioned above) and whether it deems the supply is at risk of being 'unacceptable'.
    - Investigations shall be targeted to be completed within two weeks after receipt of the complaint, including an assessment of the evidence. Where additional time is required, the complainant will be notified.
- Visy will discuss the complaint and suggested outcomes with the complainant with the aim of agreeing on an acceptable solution.
- Within 2 weeks of receiving the complaint, Visy will notify the Certifying Body and FSC Australia of the substantiated complaint, the agreed solution for the complaint and the precautionary measures Visy is taking to ensure that no unacceptable supply is received until the complaint has been resolved.
- Visy will initiate its Non-Conforming Wood Fibre Inputs process, which includes the following processes, using a precautionary approach:
    - Immediate exclusion of supply from the non-conforming supply area
    - Segregation of any pulplog already on site
    - Identification and segregation of any manufactured paper reels potentially impacted
    - Full investigation and Root Cause analysis incorporating field and/or desk verification of the evidence
- The outcome of the investigation, including actions taken, will be reported to Visy's Certifying Body, FSC Australia and the complainant.
- Full records of all complaints will be maintained, including outcomes of investigations and actions taken.

Table 8 – Revision

Revision	Date of Revision	Prepared By	Approved By:
Issue 1	January 2017	Carlie Porteous *(FSC/PEFC Administrator)*	Dean Hawkins *(Fibre and Forestry Manager)* Jean Nouaze *(GM – Visy Pulp and Paper)*
Issue 2	December 2017	Carlie Porteous *(FSC/PEFC Administrator)*	Dean Hawkins *(Fibre and Forestry Manager)* Christopher McComb *(GM – Visy Pulp and Paper)* Bill Hurditch *(The Fifth Estate)*
Issue 3	January 2019	Carlie Porteous *(Manager – Forestry and Fibre Compliance)*	Dean Hawkins *(Fibre and Forestry Manager)* Bill Hurditch *(The Fifth Estate)* Jean Nouaze *(Executive GM – Pulp and Paper)*
Issue 4	March 2020	Carlie Porteous *(Manager – Forestry and Fibre Compliance)*	Dean Hawkins *(GM – Fibre Resources)* Campbell Sanderson *(Manager – Forestry and Fibre)* Bill Hurditch *(The Fifth Estate)*
Issue 5	February 2021	Carlie Porteous *(Manager – Forestry and Fibre Compliance)*	Dean Hawkins *(GM – Fibre Resources)* Bill Hurditch *(The Fifth Estate)*
Issue 6	October 2022	Rebecca Jones *(Program Manager – Fibre Stewardship)*	Dean Hawkins *(GM – Fibre Resources)*
Issue 7	July 2023	Rebecca Jones *(Program Manager – Fibre Stewardship)*	Dean Hawkins *(GM – Fibre Resources)* Dallas Goldspink *(Fibre & Forestry Manager)*
Issue 8	March 2024	Rebecca Jones (Program Manager – Fibre Stewardship	Dean Hawkins *(GM – Fibre Resources)* Dallas Goldspink *(Fibre & Forestry Manager)*
Issue 9	February 2025	Rebecca Jones (Program Manager – Fibre Stewardship	Dean Hawkins (GM – Fibre Resources) Dallas Goldspink (Fibre & Forestry Manager)
Issue 10	February 2026	Rebecca Jones (Program Manager – Fibre Stewardship	Dean Hawkins (GM – Fibre Resources) Dallas Goldspink (Fibre & Forestry Manager)
Issue 11	October 2026	Rebecca Jones (Program Manager – Fibre Stewardship	Dean Hawkins (GM – Fibre Resources) Dallas Goldspink (Fibre & Forestry Manager)

Contact information

If you have any concerns or questions regarding this summary of Visy's Due Diligence System, please contact Visy's Representative on the details below:

Rebecca Jones
Program Manager – Fibre Stewardship
rebecca.jones@visy.com.au