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Verification of Controlled Wood Supply

Due diligence system according to FSC-STD-40-005 (V3.1) REQUIREMENTS FOR SOURCING FSC® CONTROLLED WOOD.

REV.	DATE	DESCRIPTION	APPROVED SIGNED
One	24/12/14	Reformatted to Wespine standard	ABB
Two	20/10/2015	Updated for 2015/16	ABB
B	1/2/2017	Updated for 2017/18	<i>ABB</i>
C	22/5/2018	Updated for 208/19	ABB
D	30/5/2018	Completed Annual Supplier Review	ABB
E	13/12/2018	Updated and simplified Control Measures	ABB
F	8/11/2019	Updated reference to FSC-NRA-AU V1-1	ABB

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Executive Summary

Wespine Industries Pty Ltd (Wespine) produces Softwood woodchips for export.

Supply for Wespine 's products comes from a variety of plantation sources. Some are local FSC certified and some are local controlled material source. All wood sourced is plantation grown species mainly *Pinus radiata* from Western Australia including all sub districts within these state boundaries.

Suppliers are all private wood lots supplying Controlled material included in Wespine's own FSC Controlled Wood Due Diligence System.

For all suppliers including third party private growers, detailed records are kept of supplying blocks and these are made available to FSC auditors as part of the Wespine FSC/PEFC Chain of custody system.

This document outlines the Due Diligence Systems (DDS) system under FSC-STD-40-005 (V3.1) REQUIREMENTS FOR SOURCING FSC® CONTROLLED WOOD - PART I DUE DILIGENCE SYSTEM.

The basis of the Wespine Due diligence system is three elements: obtaining information, risk assessment, risk mitigation.

Wespine concludes that there is a strong system of control for wood that it procures.

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Table 1 - Suppliers to Wespine Industries can be found at [FSC CoC-01-01 - List of FMUs and Suppliers.xlsx](#)

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1. Introduction

Wespine has controlled wood supply for their products from local controlled material sources. Local supply is from the following suppliers listed in Table 1 - Suppliers to Wespine Industries.

Wespine has conducted a risk assessment on supply as part of their verification program for controlled wood sources under FSC-STD-40-005. The risk assessment is confined to an Annex 3 verification focused on High Conservations values (HCV) only.

The risk assessment found an unspecified risk for HCV.

2. Due Diligence System

This document outlines the Due Diligence (DD) system under FSC-STD-40-005 (V3.1) REQUIREMENTS FOR SOURCING FSC® CONTROLLED WOOD - PART I DUE DILIGENCE SYSTEM.

The basis of the Wespine Due Diligence System is three elements: *obtaining information*, *risk assessment*, and *risk mitigation*.

The objective of the control measures is to ensure that there is a strong system of protection (effective protected areas and legislation) in place that ensures survival of the HCVs in the ecoregion.

2.1. Obtaining information.

Wespine uses a risk assessment on their supply chain as part of their program for controlled wood sources under FSC-STD-40-005 (V3.1). REQUIREMENTS FOR SOURCING FSC® CONTROLLED WOOD. The risk assessment used is the National Risk Assessment for Australia “(FSC-NRA-AU V1-1)” which are can be accessed at <https://fsc.org/en/document-center/documents/395> .

This National Risk Assessment has already obtained information and formulated a risk assessment and has determined a low risk for four of the five controlled wood criteria in Western Australia;

1) Illegally harvested wood, 2) wood harvested in violation of traditional and civil rights, 3) wood harvested from forests being converted to plantations or non-forest uses, and 4) wood from forests in which genetically modified trees are planted are therefore LOW RISK for the purposes of the national Risk assessment and this Due Diligence System.

The last criteria, wood harvested from forests in which high conservation values (HCV) are threatened by management activities, was found to have varied levels of risk under the current National Risk Assessment.

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The objective of the control measures is to ensure that there is a strong system of protection (effective protected areas and legislation) in place that ensures survival of the HCVs in the ecoregion.

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

Wespine also documents the risk of mixing material with non-eligible inputs in its supply chains during transport, processing, or storage. Refer to 3. Mixing Risk Assessment

Category	Summarized risk determination
1. Legality	Low
2. Civil rights	Low
3. HCV	
3.0	
3.1 – Species Diversity	Low risk – hardwood plantations in WA and all softwood plantations.
3.2 – Landscape level ecosystems and mosaics	Low risk – all plantations.
3.3 – Ecosystems and Habitats	Low risk – all plantations.
3.4 – Critical Ecosystem Services	Specified risk
3.5 – Basic needs	Low risk.
3.6 – Cultural Values	Specified risk.
4. Conversion	Low
5. GMOs	Low
Risk of Mixing	Negligible

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3. Risk Assessment

Version 4.0, Reviewed November 2019

Certificate holder:	Wespine Industries Pty Ltd	Certification Body (CB):	SCS Global Services
FSC CW Certificate Code:	SCS-CW-005153	Date of CB Approval:	Pending approval – subject to audit.
Date of risk assessment:	FSC Australia Controlled Wood Risk Assessment MATRIX <i>FSC-CWRA-001-AUS</i> Version 1-0, July 8, 2009	Address of CB:	2000 Powell Street, Suite 600 Emeryville, CA 94608 Tel: +1.510.452.8000 www.SCSglobalServices.com
Certificate holder address:	241 MOORE ROAD DARDANUP 6236 WA AUSTRALIA	Scope:	Wood in Chips or particles from WA Bioregion: SWA02, JAF01, JAF02, WAR01 IBRA See also Appendix 1 for locations of these Bioregions Equivalent WWF Bioregions Deserts and Xeric Scrublands Mediterranean Forests.

SUMMARY:

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Suppliers to Wespine Industries Pty. Ltd.

Suppliers are listed in the document:

[..\Forest Certification Systems - FSC CW, FSC CoC, PEFC CoC\FSC CoC-01-01 - List of FMUs and Suppliers.xlsx](#)

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4. Risk Mitigation - Basis of the Control Measures and Monitoring of the Control Measures

The basis of the control measures are:

1. Review of controls in place for HCV. The suppliers are all contracted for supply of softwood logs and/or chips. Harvest contractors are contracted for harvesting of trees. As part of an annual supplier approval process Wespine will review suppliers for compliance to certain contract requirements. This includes things like OHS, business insurance but now also includes a review of their control of HCV measured against the FSC Australia HCV evaluation framework.
2. For private suppliers Wespine will carry out some of the control measures themselves to assist with preparing harvest plans, or will utilise forest managers to assist.
3. Ongoing monitoring of the control measures. Wespine will monitor and verify that the control measures are undertaken in harvest planning and harvest operations. Wespine will regularly visit harvest operations and will monitor the control measures during those visits e.g. checking harvest records, harvest QA records, and CoC & FSC CoC-07-01 Forest Operation Inspection

[..\Forest Certification Systems - FSC CW, FSC CoC, PEFC CoC\CoC & FSC CoC-07-01 Forest Operation Inspection.docx](#).

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

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Entity	Risk	Risk Control Measures	Desired Outcomes of Control Measures	Ongoing Monitoring of Control Measures	Residual Risk
Wespine	Our DDS System is deficient	- Annual auditing externally and internally	- Ensure that our system is up to date and reflects good practices.	- Membership of HCV user group in WA.	Very Low.
		- Invitation to stakeholders to review and make comment upon the DDS	- identification by external agents of deficient practices	- periodic updating of stakeholder list to check relevant entities are consulted.	Very Low.
		- Engagement of external experts in the process of internal auditing and pre-external audit gap analysis to provide advice on failings	- Ensure that our system is up to date and reflects good practices.	- Membership of HCV user group in WA.	Very Low.
	Mixing of Product	-Wespine maintains rigorous stock control methods, using Log Row Inventory systems in both sawlog and chiplog yards.	- that Wespine knows exactly the source of logs and which row in our inventory system they are in.	- monthly reconciliation of supplier invoices with chipping invoices.	Very Low.
Forest Products Commission	Failure to identify HCVs prior to harvesting.	- Significant investment in RFA process. - WA has Comprehensive, adequate and representative reserves system. - Detailed DBCA 019 process identifies tenure, biological diversity, productive capacity, soil conservation, water and socio-economic aspects to be managed. - Detailed map overlays are prepared and transferred via FPC377 process.	- Identify HCVs if they exist.	- DBCA-019s and FPC-377s are provided to Wespine upon request and filed with FPC709s.	Very Low.

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	Damage to HCVs while harvesting operations take place	<ul style="list-style-type: none"> - DBCA 019 Process. - Operational Maps. - Biodiversity overlays. - FPC377 Handover process to contractors. - FIFWA Code of Practice. - 3rd party AFS certification - Supplier monitoring (FPC 106) and escalation (FPC 080) for transgressions. 	- HCVs protected.	<ul style="list-style-type: none"> - Sites sampled and physically visited. - Supplier provides evidence of site audits and FPC106 forms. 	Very Low.
	Taking wood from blocks that are not covered under DDS.	<ul style="list-style-type: none"> - FPC 709 System. - Operation ID recorded on all delivery notes. - Supplier checks and does its own audits. - Operational Maps. - FPC377 Handover process to contractors. 	- Supply chain consists only of DDS endorsed material.	Check of dnotes and other delivery documents.	Very Low.
Australian Forestry Services	Failure to identify HCVs prior to harvesting.	<ul style="list-style-type: none"> - Significant investment in RFA process. - AFS harvest on private property - WA has Comprehensive, adequate and representative reserves system. - HCVs contained within Public Lands. - Surveys of Naturemap. - Property Records purchased from Landgate, which records publically available data and overlays which affect the title (e.g. aboriginal heritage, threatened species, water catchments, salinity risk). 	- Identify HCVs if they exist.	- AFS provide evidence of property searches	Low
	Damage to HCVs while harvesting operations take place	<ul style="list-style-type: none"> - Operational Maps. - FIFWA Code of Practice. 	- HCVs identified.	<ul style="list-style-type: none"> - Sites sampled and physically visited. - Supplier provides operational maps upon request. 	Low
	Taking wood from blocks that are not covered under DDS.	<ul style="list-style-type: none"> - Harvesting Operation Notification System. - Operation ID recorded on all delivery notes. - Operational Maps. - Pine plantation 	- Supply chain consists only of DDS endorsed material.	Check of dnotes and other delivery documents.	Very Low.

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Saddleback Tree Farms	Failure to identify HCVs prior to harvesting.	<ul style="list-style-type: none"> -SBTF harvest on private property. - WA has Comprehensive, adequate and representative reserves system. - HCVs contained within Public Lands. - Property Records purchased from Landgate, which records publically available data and overlays which affect the title (e.g. aboriginal heritage, threatened species, water catchments, salinity risk). 	<ul style="list-style-type: none"> - Identify HCVs if they exist. 	<ul style="list-style-type: none"> - Wespine conducted the searches. - Only one location, so operationally very stable. 	Low
	Damage to HCVs while harvesting operations take place	<ul style="list-style-type: none"> - Handover process to contractors. - FIFWA Code of Practice. - Monitoring compliance (SBTF 663). - Reporting to Newmont. 	<ul style="list-style-type: none"> - HCVs protected. 	<ul style="list-style-type: none"> - Sites sampled and physically visited. - Supplier provides operational maps upon request. 	Low
	Taking wood from blocks that are not covered under DDS.	<ul style="list-style-type: none"> - Harvesting Operation Notification System. - Operation ID recorded on all delivery notes. - Operational Maps. 	<ul style="list-style-type: none"> - Supply chain consists only of DDS endorsed material. 	<ul style="list-style-type: none"> Check of dnotes and other delivery documents. 	Very Low.
Other Private Suppliers	Failure to identify HCVs prior to harvesting.	<ul style="list-style-type: none"> -Private property. - WA has Comprehensive, adequate and representative reserves system. - HCVs contained within Public Lands. - Property Records purchased from Landgate, which records publically available data and overlays which affect the title (e.g. aboriginal heritage, threatened species, water catchments, salinity risk). 	<ul style="list-style-type: none"> - Identify HCVs if they exist. 	<ul style="list-style-type: none"> - Wespine conducted the searches. - Only one location, so operationally very stable. 	Low
	Damage to HCVs while harvesting operations take place	<ul style="list-style-type: none"> - Handover process to contractors. - FIFWA Code of Practice. 	<ul style="list-style-type: none"> - HCVs identified. 	<ul style="list-style-type: none"> - Sites sampled and physically visited. - Supplier provides operational maps upon request. 	Low

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<p>Taking wood from blocks that are not covered under DDS.</p>	<ul style="list-style-type: none"> - Self Declaration by owners. - Operation ID recorded on all delivery notes. 	<ul style="list-style-type: none"> - Supply chain consists only of DDS endorsed material. 	<p>Check of dnotes and other delivery documents.</p>	<p>Very Low.</p>
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5. Assessment of the HCV Control System

5.1. Forest Products Commission

General

The controlled materials are sourced predominantly from public land vested in the Department of Biodiversity, Conservation and Attractions (DBCA) and some privately owned land (Sharefarms). The common thread is that the harvest is managed by the Forestry Products Commission (FPC).

The overall strategy for harvesting the WA State Government owned plantation estate is set within the Forest Management Plan. The forest management plan covers lands vested in the Conservation and Parks Commission within the State's south-west forests. The focus of forest management plans is on managing State forest and timber reserves because it is primarily on these land categories that disturbance activities are permitted.

The forest management plan is a 10-year plan developed in consultation with the community. It is the key policy framework for managing forests as these plans identify goals and performance targets and propose management activities to achieve these goals.

The Forest management plan 2004-2013 was the first plan prepared since the management of forests was separated from commercial timber operations in 2000.

Under this plan old-growth forest was excluded from timber harvesting and the conservation reserve system was extended creating 29 national parks, conservation parks and nature reserves. Approximately 500,000 hectares was added to the conservation reserve system.

The Forest management plan 2014-2023 provides the policy framework for managing south-west native forests until 2023. The Minister released the Forest management plan 2014-2023 on 6 December 2013.

Covering 2.5 million hectares from Lancelin, north of Perth, to Denmark on the south coast, nearly 62 per cent of this total land area is in existing or proposed conservation reserves or otherwise protected areas. The plan aims to strike a balance between conservation and other activities. It incorporates a number of management activities to help conserve biological diversity, provide for recreation and a sustainable native forest products industry, and to protect water catchments.

Protected areas in Western Australia well exceed those minimum levels recommended in the Forest Management Plans. This level for most areas is 15% of the pre-1750 area. The chart **Figure 1** below gives a breakdown by forest ecosystems.

This target was set during the negotiations towards the Western Australian Regional Forest Agreement (RFA)¹. The WA RFA is a 20-year agreement between the State and Commonwealth governments on the use and management of the forests of Western Australia's south-west. The WA RFA was signed on 4 May 1999 and expires in 2019.

¹ <https://www.dpaw.wa.gov.au/management/forests/managing-our-forests/74-wa-regional-forest-agreement-progress-report>

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It meets the three main objectives of the RFA process:

- to protect environmental values in a world class system of national parks and other reserves, based on nationally agreed criteria;
- to encourage job creation and growth in forest-based industries, including wood products, tourism and minerals; and
- to manage all native forests in a sustainable way.

For the environment, it established a world class reserve system which is Comprehensive, Adequate and Representative (CAR) of the forests' biodiversity, old-growth forest, and other natural and cultural values. The Parties to the RFA agreed that CAR Reserve System would adequately provide for the protection of rare or threatened flora and fauna species. The Parties went on to acknowledge the CAR reserve system met the 'JANIS' Reserve Criteria.

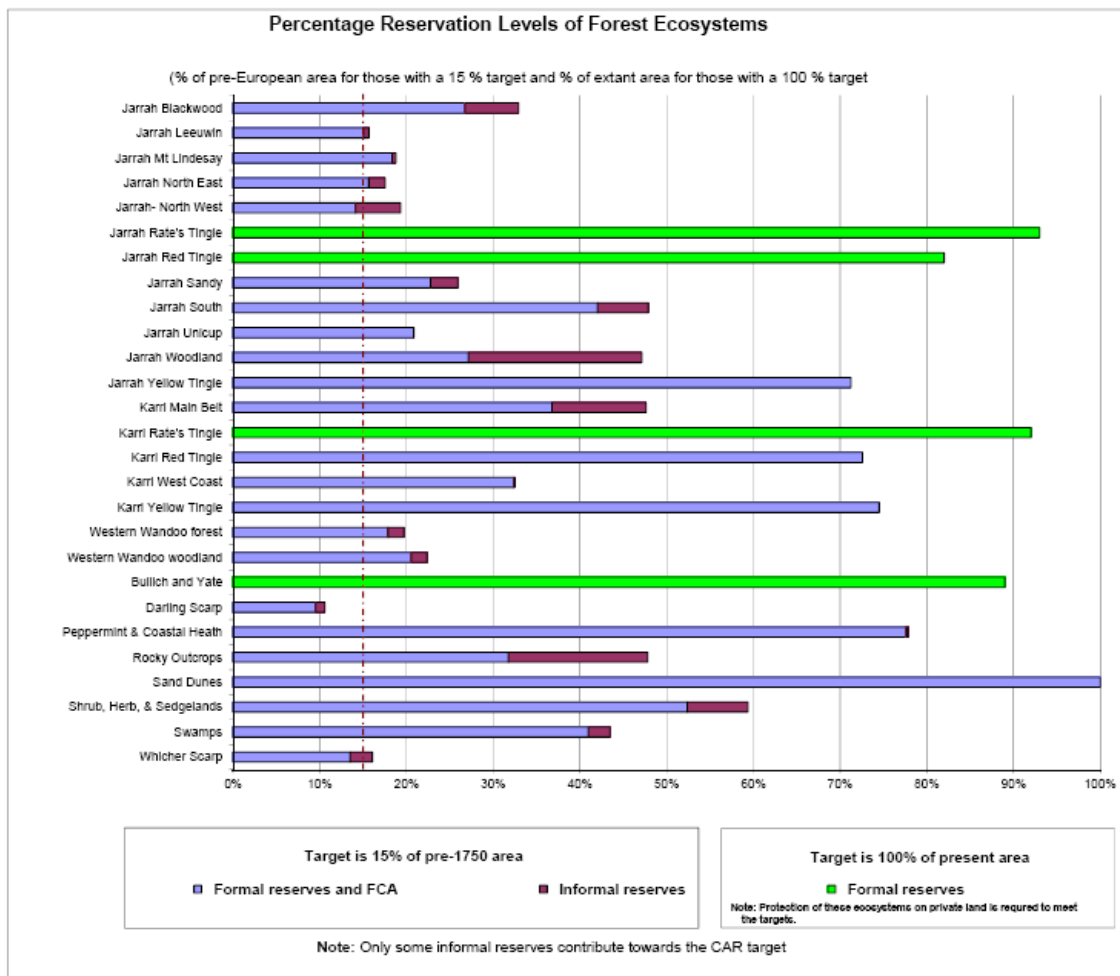


Figure 1 - Reservation against CAR Target for Forest Ecosystems, Conservation Commission, Draft FMP 2014-2023, pg 33.

For harvesting (a "disturbance activity", which also includes roading, silviculture work) on DBCA vested land, DBCA prepare a Form DBCA 019 that covers:

- Tenure

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- Biological Diversity
- Productive Capacity
- Health and Vitality
- Soil Conservation
- Water
- Socio economic

Operations on private land go through a similar process and produce an FPC47.

There is a 5 year strategic harvest plan for wood flows over those 5 years and Annually produced detailed harvest plans for coupes to be harvested in that year. The harvest plans must be submitted for approval by DBCA for compliance to the Forest Management Plan.

The key aspects of the DBCA377/FPC47 that are within the control or influence of the FPC area officer in charge and the contractors reporting to the FPC are communicated at the commencement of an operation via an FPC377.

The 377 distills key operational controls, and includes maps showing rare threatened and endangered species in the locality, areas of significance for First Nations and water values that could be negatively affected by poor performance. It also includes details of stakeholders within the local area, and details what communication has been made to local residents (for example).

Once an operation has commenced, the day to day supervision of the performance against the 377 is monitored using a FPC106. This is now an electronic document, and automatically backs up to a central collector server, allowing full visibility that operational checks are being performed.

Further, it tracks escalations that occur when a transgression has been detected or observed. This escalated activity is known as an FPC080, and includes specific, time bound, follow up actions and inspections that must be closed out. Again, this is a visible process.

HCV 1. Forest areas containing habitat for national or state-listed threatened species or species of high significance.

DBCA biodiversity overlays are used to identify and RTE species, If any are identified they are noted in the harvest plan, maps and the document that is given to contractors to operationalizes the plan (form 377) and DBCA provides a prescription as to their management and this is noted in the harvest plan. The presence of RTE values is also noted on maps that are contained in the harvest plans.

HCV 2. Forest areas containing large landscape level forests, contained within, or containing the management unit, where viable populations of most, if not all, naturally occurring species exist in natural patterns of distribution and abundance.

Not many areas under harvest are in large landscape level forests. Others however do have areas of significance²

² The forest is significant in the region due to its size, condition, and/or importance to biodiversity conservation. Factors to consider include:
Rarity of forests of this size and quality within the region. (FSC Australia)

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Those areas with landscapes intact are known and have assessments done on them³ Harvest plans will consider impacts on these values on a coupe by coupe basis and mitigate them. Plans are approved by DBCA.

HCV 3 Forest areas that are in or contain rare, threatened or endangered ecosystems.

DBCA biodiversity overlays are used to identify and RTE ecosystems e.g. Informal reserves, Conservation reserves, Informal habitat zones, Threatened communities, RAMSAR sites. If any are identified they are noted in the harvest plan and DBCA provides a prescription as to their management and this is noted in the harvest plan. The presence of RTE ecosystem values is also noted on maps that are continued in the harvest plans. There is a mechanism to feed back to DBCA in the event that new values are noted that are not on the overlays and maps managed by DBCA.

HCV 4. Forest areas that provide basic services of nature in critical situations such as slope, erosion control, water catchment.

Although the Code of Practice is not compulsory for general forestry FPC required it to be followed <http://www.forestindustries.com.au/upload/Code%20of%20Practice%20for%20Timber%20Plantations%20in%20WA%202006.pdf>

The Code of Practice meets the requirements of HVC 4⁴

The FPC Timber Harvest Manual is based on the CoP and is followed.

Values are identified before harvest and incorporated into the harvest plan. In particular, where the coup is in an irrigation or drinking water catchment specific requirements are followed. For country or metro water supply catchments approvals by the water authorities is required under legislation.

Pre operations planning (FPC47 and DBCA019) and checklists used during harvest include elements contained in the Code of Practice. These are collated and signed off as part of the documentation recording compliance in a harvesting coup.

In 2013 there was the introduction of a new soils assessment procedure. Since then, an online induction tool for all forest contractors has been compulsory. This covers aspects such as soil movement, water conservation, and maintaining the productive capacity of the forest.

HCV 5. Forest areas fundamental to meeting basic needs of local communities (water, food, firewood, shelter, income) with no readily available alternative.

NOTE: These are not applicable in this situation⁵ e.g. no one relies on these forests for fire wood or shelter.

³ egRegional surveys: vegetation communities, condition assessment, wilderness assessment, concentrations of species, old growth, wilderness, growth stage, vegetation condition and remnant vegetation, logging history (FSC Australia)

⁴ Identification and mapping of HCV value areas pre harvest. Expert elicitation (documented in the code of practice) Code of practice which is followed. (FSC Australia)

⁵ Local people use the area to obtain resources on which they are critically dependent. (FSC Australia).

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HCV 6. Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities)

DBCA use publically available information to identify and heritage sites on their land, If any are identified they are noted in the harvest plan and DBCA provides a prescription as to their management and this is noted in the harvest plan. There is also consultation with the Department of Indigenous Affairs (DIA) and the South West Land and Sea council on the adequacy of these measures. The presence of Heritage values is also noted on maps that are continued in the harvest plans.

There is also cultural heritage training on observation and recognition of cultural heritage and dealing with cultural heritage issues is covered in the Timber harvesting manual.

If sites or artifacts are found during activities the appropriate authority (DIA) is alerted and their instructions followed. (Note this is mandatory in WA for Aboriginal sites). DIA are responsible for informing the South West land and Sea Council in such cases.

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5.2. Australian Forestry Services

General

The controlled materials are sourced from *Pinus spp* mainly *P radiata* from private plantations or farm forestry plantations grown in Forest management lots up to 150 Ha .

For the purposes of sampling this forest have been considered Small Low Intensity Managed Forests (SLIMF)⁶.

If plantations have been established shire approval is needed for the establishment.

In the case of wood harvest on behalf of private growers there is a grower questionnaire that establishes to the best of the private growers knowledge about the presence of HCVs on their land.

In addition publicly available information is interrogated to determine the presence or absence of HCV e.g. <http://naturemap.dec.wa.gov.au/default.aspx>

Any findings of HCV are recorded on maps and form part of the harvest plans. Harvest

HCV 1. Forest areas containing habitat for national or state-listed threatened species or species of high significance.

In general these are small plantations in and around farmed land with little or no native bush or habitat areas so the presence of Rare Threatened or Endangered (RTE) is unlikely. However there following steps are taken:

- The owner is asked if they know of any known sites with RTE species.
- Non planted areas are shown on a site map.
- Publically available maps and overlays are interrogated for the presence of RTE species.
- In the event that there are significant populations of RTE advice is sought on their management.
- The Non planted areas including native bush integral or adjacent to the FMU are not disturbed during harvest (NB the protection of bush is mandatory in WA and any clearing e.g. for safety etc. is heavily regulated).

HCV 2. Forest areas containing large landscape level forests, contained within, or containing the management unit, where viable populations of most, if not all, naturally occurring species exist in natural patterns of distribution and abundance.

In general these are small plantations in and around farmed land. There are no large landscape level forest considerations these FMU.

HCV 3 Forest areas that are in or contain rare, threatened or endangered ecosystems.

The same actions as for HCV 1:

⁶ FSC Australia Has determined that in Australia FMUs of up to 1000 ha can qualify as SLIMF

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- The owner is asked if they know of any known sites with RTE ecosystems.
- Non planted areas are shown on a site map.
- Publically available maps and overlays are interrogated for the presence of RTE ecosystems.
- In the event that there are significant RTE ecosystems advice is sought on their management.
- The Non planted areas including native bush integral or adjacent to the FMU are not disturbed during harvest (NB the protection of bush is mandatory in WA and any clearing e.g. for safety etc is heavily regulated).

HCV 4. Forest areas that provide basic services of nature in critical situations such as slope, erosion control, water catchment.

Although not mandatory in WA the state code of practice for timber production is followed.
<http://www.forestindustries.com.au/upload/Code%20of%20Practice%20for%20Timber%20Plantations%20in%20WA%202006.pdf>

There is an on-site analysis pre harvest to identify issue, this leads to control measures e.g.:

- Riparian zones are excluded from disturbance during harvest.
- Creek lines are kept free of activity or debris.
- For erosion control roading is maintained and drainage is maintained.
- Stream crossing is only at designated points.
- In wet periods there is no harvesting in heavy or steep land.

HCV 5. Forest areas fundamental to meeting basic needs of local communities (water, food, firewood, shelter, income) with no readily available alternative.

NOTE: These are not applicable in this situation ie. This is private land, no one relies on these forests for fire wood or shelter.

HCV 6. Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities)

The owner declares any known sites heritage sites.

Publically available maps and overlays are interrogated for the presence of Heritage sites eg.
<http://www.dia.wa.gov.au/AHIS/default.aspx> For Aboriginal Cultural Heritage.

<http://stateheritage.wa.gov.au/state-heritage-register/about-the-state-heritage-register/heritage-places-database>

For post Colonial heritage sites. If the land has been recently established then a record of shire approval should also show a cultural heritage check.

If sites or artifacts are found during activities the appropriate authority is alerted and their instructions followed.(Note this is mandatory in WA for Aboriginal sites).

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5.3. Barker Timber Group

General

The controlled materials are sourced predominantly from privately owned land (Sharefarms). The plantation up to the point of harvest is managed by the Forestry Products Commission (FPC). Barker Timber Group have a contract that allows them to harvest and sell products from specified share farms in the "Mid West" area.

FPC produce an FPC47 which covers:

- Tenure
- Biological Diversity
- Productive Capacity
- Health and Vitality
- Soil Conservation
- Water
- Socio economic

Operations on private land go through a similar process and produce an FPC47.

The key aspects of the FPC47 that are within the control or influence of the FPC area officer in charge and the contractors reporting to the FPC are communicated at the commencement of an operation via an FPC377.

The 377 distils key operational controls, and includes maps showing rare threatened and endangered species in the locality, areas of significance for First Nations and water values that could be negatively affected by poor performance. It also includes details of stakeholders within the local area, and details what communication has been made to local residents (for example).

Once an operation has commenced, the day to day supervision of the performance against the 377 is monitored using a FPC106. This is now an electronic document, and automatically backs up to a central collector server, allowing full visibility that operational checks are being performed.

Further, it tracks escalations that occur when a transgression has been detected or observed. This escalated activity is known as an FPC080, and includes specific, time bound, follow up actions and inspections that must be closed out. Again, this is a visible process.

HCV 1. Forest areas containing habitat for national or state-listed threatened species or species of high significance.

See "FPC" above.

HCV 2. Forest areas containing large landscape level forests, contained within, or containing the management unit, where viable populations of most, if not all, naturally occurring species exist in natural patterns of distribution and abundance.

See "FPC" above.

HCV 3 Forest areas that are in or contain rare, threatened or endangered ecosystems.

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See "FPC" above.

HCV 4. Forest areas that provide basic services of nature in critical situations such as slope, erosion control, water catchment.

See "FPC" above.

HCV 5. Forest areas fundamental to meeting basic needs of local communities (water, food, firewood, shelter, income) with no readily available alternative.

See "FPC" above.

HCV 6. Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities)

See "FPC" above.

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5.4. Saddleback Tree Farms

General

The controlled materials are sourced from *Pinus spp* mainly *P radiata* from private plantations.

If plantations have been established shire approval is needed for the establishment.

Publicly available information is interrogated to determine the presence or absence of HCV e.g. <http://naturemap.dec.wa.gov.au/default.aspx>

A property interest report is also interrogated periodically <https://www0.landgate.wa.gov.au/property-reports/single-address-report/property-interest-reports>

Any findings of HCV are recorded on maps and form part of the harvest plans. Harvest

HCV 1. Forest areas containing habitat for national or state-listed threatened species or species of high significance.

There are several controls in place to determine species of high significance, and to protect habitat.

- Non planted areas are shown on a site map.
- Publically available maps and overlays are interrogated for the presence of RTE species.
- The Non planted areas including native bush integral or adjacent to the FMU are not disturbed during harvest

HCV 2. Forest areas containing large landscape level forests, contained within, or containing the management unit, where viable populations of most, if not all, naturally occurring species exist in natural patterns of distribution and abundance.

There are no large landscape level forest considerations these FMU.

HCV 3 Forest areas that are in or contain rare, threatened or endangered ecosystems.

The same actions as for HCV 1:

HCV 4. Forest areas that provide basic services of nature in critical situations such as slope, erosion control, water catchment.

Although not mandatory in WA the state code of practice for timber production is followed. <http://www.forestindustries.com.au/upload/Code%20of%20Practice%20for%20Timber%20Plantations%20in%20WA%202006.pdf>

There is an on-site analysis pre harvest to identify issue, this leads to control measures e.g.:

- Riparian zones are excluded from disturbance during harvest.
- Creek lines are kept free of activity or debris.

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- For erosion control roading is maintained and drainage is maintained.
- Stream crossing is only at designated points.
- In wet periods there is no harvesting in heavy or steep land.

HCV 5. Forest areas fundamental to meeting basic needs of local communities (water, food, firewood, shelter, income) with no readily available alternative.

NOTE: These are not applicable in this situation i.e.. This is private land, no one relies on these forests for fire wood or shelter.

HCV 6. Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities)

The owner declares any known sites heritage sites.

Publicly available maps and overlays are interrogated for the presence of Heritage sites eg. <http://www.dia.wa.gov.au/AHIS/default.aspx> for Aboriginal Cultural Heritage.

<http://stateheritage.wa.gov.au/state-heritage-register/about-the-state-heritage-register/heritage-places-database> for post Colonial heritage sites.

If the land has been recently established then a record of shire approval should also show a cultural heritage check.

If sites or artifacts are found during activities the appropriate authority is alerted and their instructions followed.(Note this is mandatory in WA for Aboriginal sites).

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5.5. Other Private Wood Suppliers

General

The controlled materials are sourced from Pinus spp mainly *P radiata*.

For the purposes of sampling these forests have been considered Small Low Intensity Managed Forests (SLIMF)⁷.

Wespine audits include these Forest management Units (FMUs) in every annual verification audit

5.5.1. Assessment of the HCV control system

Publicly available information is interrogated to determine the presence or absence of HCV e.g. <http://naturemap.dec.wa.gov.au/default.aspx>

Any findings of HCV are recorded on maps and form part of the harvest plans.

HCV 1. Forest areas containing habitat for national or state-listed threatened species or species of high significance.

In general these are small plantations in and around farmed land with little or no native bush or habitat areas so the presence of Rare Threatened or Endangered (RTE) is unlikely. However there following steps are taken:

- The owner is asked if they know of any known sites with RTE species.
- Non planted areas are shown on a site map.
- Publically available maps and overlays are interrogated for the presence of RTE species.
- In the event that there are significant populations of RTE advice is sought on their management.
- The Non planted areas including native bush integral or adjacent to the FMU are not disturbed during harvest (NB the protection of bush is mandatory in WA and any clearing e.g. for safety etc. is heavily regulated).

HCV 2. Forest areas containing large landscape level forests, contained within, or containing the management unit, where viable populations of most, if not all, naturally occurring species exist in natural patterns of distribution and abundance.

In general these are small plantations in and around farmed land. There are no large landscape level forest considerations in these FMUs.

HCV 3 Forest areas that are in or contain rare, threatened or endangered ecosystems.

The same actions as for HCV 1:

- The owner is asked if they know of any known sites with RTE ecosystems.
- Non planted areas are shown on a site map.

⁷ FSC Australia Has determined that in Australia FMUs of up to 1000 ha can qualify as SLIMF

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- Publically available maps and overlays are interrogated for the presence of RTE ecosystems.
- In the event that there are significant RTE ecosystems advice is sought on their management.
- The Non planted areas including native bush integral or adjacent to the FMU are not disturbed during harvest (NB the protection of bush is mandatory in WA and any clearing e.g. for safety etc is heavily regulated).

HCV 4. Forest areas that provide basic services of nature in critical situations such as slope, erosion control, water catchment.

Although not mandatory in WA the state code of practice for timber production is followed.
<http://www.forestindustries.com.au/upload/Code%20of%20Practice%20for%20Timber%20Plantations%20in%20WA%202006.pdf>

Control measures include:

- Riparian zones are excluded from disturbance during harvest.
- Creek lines are kept free of activity or debris.
- For erosion control roading is maintained and drainage is maintained.
- Stream crossing is only at designated points.
- In wet periods there is no harvesting in heavy or steep land.

HCV 5. Forest areas fundamental to meeting basic needs of local communities (water, food, firewood, shelter, income) with no readily available alternative.

NOTE: These are not applicable in this situation i.e. This is private land, no one relies on these forests for fire wood or shelter.

HCV 6. Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities)

The owner declares any known sites heritage sites.

Publically available maps and overlays are interrogated for the presence of Heritage sites e.g. For Aboriginal Cultural Heritage. <http://www.dia.wa.gov.au/AHIS/default.aspx>

If the land has been recently established then a record of shire approval should also show a cultural heritage check. For post Colonial heritage sites. <http://stateheritage.wa.gov.au/state-heritage-register/about-the-state-heritage-register/heritage-places-database>

If sites or artifacts are found during activities the appropriate authority is alerted and their instructions followed.(Note this is mandatory in WA for Aboriginal sites).

There is also cultural heritage training on observation and recognition of cultural heritage and dealing with cultural heritage issues is covered in the Timber harvesting manual.

If sites or artifacts are found during activities the appropriate authority (DIA) is alerted and their instructions followed. (Note this is mandatory in WA for Aboriginal sites). DIA are responsible for informing the South West land and Sea Council in such cases.

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6. Monitoring the Control Measures

For all suppliers including private growers detailed records are kept of supplying blocks and these are made available to FSC auditors.

Wespine monitor the control measures, e.g. checking harvest records, harvest QA records, Harvest Diaries at every site visit during harvest. This will include visits to 100% of all private blocks harvested under harvest plans prepared by Wespine.

FPC and AFS harvested blocks are all harvested under the same system so audits undertaken at irregular visits of FPC and AFS harvest block are all used as audits of control measures using form [CoC & FSC CoC-07-01 Forest Operation Inspection.docx](#)

There is a specific record of these visits kept by Wespine as evidence of the monitoring of these control measures.

Wespine has reflected upon its experience with HCV monitoring over the several years that the company has been involved in the FSC Controlled Wood program. We have not yet encountered a situation where HCVs have been threatened by the normal harvesting activities that are involved in supplying Wespine with logs. Accordingly, on the basis of our internal risk assessment, we have determined that there is no need for a clearly defined mechanism, such as a sampling plan setting out intensity or frequency to review the adequacy of HCV mechanisms.

Wespine is a party to an industry wide HCV “user group”, and we use the experiences of others to inform us about the need for more in-depth or more regular assessment of HCV control measures.

We will also respond to stakeholder feedback and views. When evidence exists that HCV’s are not being adequately addressed, then we will revise our position, and consider regular and systematic reviews.

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7. Mixing Risk Assessment

Mixing Risk Assessment for FSC Controlled Wood			Project/Work Description: FSC Controlled wood Due diligence system
Risk Assessment Team (Name/s): Brad Barr			Approved by Supervisor / Reporting Officer: Brad Barr
Date Conducted: 8/11/2019		Next Review Date: 8/11/2020	
Step	Hazard Identification	Risk Evaluation and justification	Control Measure
Harvest	Taking wood from blocks that are not covered under the Due Diligence system.	Negligible risk Only contracted wood is taken. All contracted wood from all suppliers are covered under the Due diligence system	The delivery note system ensures that wood is fully traceable to a coup of origin and that these coups are covered by the DDS. Full details of the traceability system are included in the document. DOCUMENT NO: COC-01 Wespine INDUSTRIES PTY LTD Chain of Custody Procedure. Suppliers must provide "FPC 709" or Harvesting operation notification sheets prior to new operations commencing. <i>The desired outcome is that no new operations commence without Wespine's knowledge, and that full opportunity exists to inspect operations, if so desired.</i>
	Wood from outside the risk assessed area	Only supply from Central forest district due to economic truck radius.	The delivery note system ensures that wood is fully traceable to a coup of origin and that these coups are covered by the DDS. <i>The desired outcome is that all deliveries are identified back to source and the risk of mixing becomes negligible.</i>
		All of W Australia has the same risk	

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Receival, processing and storage at different chipping sites and transport of chip to the organisations chip pile/point of sale at the Port of Bunbury	Receival, processing and storage at different chipping sites and transport of chip to the organizations chip pile at the Port of Bunbury Taking of wood from blocks that are not covered under the Due Diligence system	Only contracted wood is processed, stored and transported to the Port of Bunbury. All contracted wood from all suppliers are covered under the Due diligence system. Negligible risk	The Inventory, stock control system and transport delivery note system ensures that wood is fully traceable to wood covered by the DDS at all stages . Suppliers have mechanisms in place to manage inventory. WAPRES Diamond Mill is FSC CoC and PEFC CoC certified. <i>The desired outcome is that we select outsourced suppliers with demonstrated capability and experience in materials handling and storage so that the risk of mixing becomes negligible.</i>
In the wood chip pile		Negligible risk Only supply covered by the traceability system is allowed entry to the storage areas.	The computerized receival system only allows loads of logs or chips covered by a delivery note from a coupe that is traceable and covered by this DDS. <i>The desired outcome is no loads are delivered from operations which have not been entered into the database prior.</i>

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8. Stakeholder Consultation

This procedure is used for stakeholder consultations and instances when comments or complaints from Stakeholders. Formal stakeholder consultations will take place when the DDS is first set up and after that only whenever a risk designation of control measure changes. Comments and complaints may occur at any time.

1. Stakeholder identification: Wespine identified affected and interested stakeholders in relation to the forest management activities of their suppliers and the identified risk, including the stakeholder groups listed below. Forest Products Commission, and Australian Forestry Services consult routinely with neighbours, on HCV protections mentioned in the DDS. Wespine will identify and consult directly for operations on small private plantations it plans.
2. Consultation with directly affected stakeholders for small private plantations will occur for each private plantation harvested. Consultation will occur by direct contact, phone or email. Private plantation owners will be asked to complete the "Wespine Industries Pty Ltd FSC Controlled Wood Owner/Agent Declaration" and supplier operation details forms.
3. Stakeholder notification: Identified stakeholders will be invited to participate in the consultation at least six (6) weeks prior to the change to the DDS or related control measures that is the subject of the consultation. Wespine shall employ effective means to inform stakeholders, using culturally appropriate consultation techniques. FSC Australia will be involved in the consultation both as a stakeholder and as a conduit to invite stakeholder comments via the FSC Australia web page.
4. Stakeholder engagement techniques. Techniques to contact stakeholders may include Face to face meetings, personal contacts by phone, email, or letter, notice published in the national and/or local press and on relevant websites (e.g. FSC Australia), local radio announcements, or local customary notice boards and bullroarers.
5. Stakeholder consultation. All identified stakeholders are provided access to information that is relevant to the consulted issue no later than six (6) weeks prior to the change to the DDS that is the subject of the consultation. Wespine only excludes information that is considered confidential. In such cases a justification for the confidential nature of the information is presented to the FSC certification.

If there is a requirement to publish the comments stakeholders will be asked to provide their consent to the publication of their comments.

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

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8.1. Consultation records

Wespine maintains records of the consultation process, including a list of stakeholders consulted and their comments, and evidence that the consultation was carried out in line with the requirements of this standard.

8.2. Content of the report

Wespine will prepare a report of the consultation process, which includes:

- a) The areas for which the stakeholder consultation has been conducted (e.g. geo-reference data, state, province, supply unit);
- b) A list of the stakeholder groups invited by Wespine to participate in the consultation;
- c) A summary of the stakeholder comments received. These will not normally be published but if they are comments are only be published with prior consent from the consulted stakeholder and not associated with stakeholder names;
- d) A description of how Wespine has taken stakeholder comments into account;
- e) The organization's justification for concluding that the material sourced from these areas can be used as controlled material or sold with the FSC Controlled Wood claim of the certification process, according to Section 6 of the controlled wood standard.

8.3. Stakeholders groups

Groups or individuals representing the interests listed below, that are relevant and according to identified risk, will be identified and added to a stakeholder database and notified during the consultation process. Each group specified may be represented by an unlimited number of representatives, subject to balanced consideration of the input received during the consultation. The list is not comprehensive and any other stakeholder groups relevant to the certification process may be identified, added to the stakeholder database and notified.

Economic interests:

- a) Forest owners and/or managers of large, medium and small forests, and high, medium, and low-intensity managed forests;
- b) Forest contractors (including loggers);
- c) Representatives of forest workers and forest industries;
- d) Certificate holders
- e) Social interests
- f) NGOs involved or with an interest in social aspects of forest management and other related operations;
- g) Forest workers;
- h) International, national and local trade/labour unions;
- i) Representatives of local communities involved or with an interest in forest management, including those relevant for HCVs 5 and 6;
- j) Representatives of Indigenous Peoples and/or traditional peoples (if present
- k) and/or holding rights), including those relevant for HCVs 5 and 6;
- l) Representatives of recreational interests
- m) FSC-accredited certification bodies active in Australia,
- n) experts,

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- o) research institutions and universities or FSC regional offices,
- p) Other directly affected local stakeholders.

Environmental interests

- a) NGOs involved or with an interest in the environmental aspects of forest management. Consultation should target the following areas of interest and expertise:
 - Biological diversity
 - Water and soil
 - HCVs 1-4
- b) Local communities and Indigenous Peoples' representatives (HCVs 5 and 6).

FSC-accredited certification bodies active in the country

- National and state forest agencies
- Experts with expertise in controlled wood categories
- Research institutions and universities
- FSC Australia

8.4. Stakeholder complaints about the DDS.

All complaints are dealt with by a common procedure which is documented in Chain of Custody and Controlled Wood Procedure APPENDIX 1 – Wespine DISPUTE AND ISSUE RESOLUTION PROCEDURE. A copy of this procedure is available on request.

Contact information of the person or position responsible for addressing Complaints:

Resource Manager
Wespine Industries Pty Ltd
0427 0800 75

9. Auditor training

Wespine personnel conducting field verification audits have had appropriate training on the concept of High Conservation Values against the requirements of the FSC Australia HCV framework.

10. Internal Audit of the DDS

The Wespine DDS is internally audited at least annually to ensure that it is being implemented correctly. The scope, dates, and staff involved in internal are recorded on the records of internal audits. Where the DDS is evaluated as ineffective during the internal audit all relevant issues are addressed and corrected within 12 months of their detection.

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