Bureau Veritas Certification Holding 67/71 Boulevard du Château 92200 Neuilly sur Seine – France www.certification.bureauveritas.com

Company name:

Adress:



# RISK ASSESSMENT FOR FSC CONTROLLED WOOD

(According to FSC-STD-40-005 V3-1)

Beloostrovskaya str., 6A, 19342, St. Petersburg, Russia

LLC Street

Certificates Code:		FSC CoC: BV-COC-119290		
		FSC CW: BV-CW-119290		
Certification Body:		Bureau Veritas Certif	ication	
Date of initial Risk Assessment		01/9/2017		
(to be completed by the Compa	ny)	01/9/2017		
Date of the annuel review		40/00/0047	After this review, was the Risk Assessment amended?	
(to be completed by the Company)		16/09/2017	□ Yes ▼ No	
Date of approval <sup>[1]</sup> by Bureau Veritas Certification		17/04/2017		
Purchased product type:	W1.1 Round	wood		
(According to FSC-STD-40-				
004a)				
Species:	Pinus sylvest	ris, picea abies, betula	pendula, populus spp.	
Type of source:	Wood supplie	ers		
Country:	Russia			
Districts:	Karelia, Volo	gda, Leningrad, Novgo	rod, Arkhangelsk, Tver, Pskov	
[1]NOTE: The latest version of Pick A	seesement (Duhl	ic Summary version) sha	Il he available on the ESC database within seven (7) business days of approving a new	

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or updated risk assessment or the issuing of FSC Controlled Wood certification code. The risk assessment shall be approved by HUB FSC COC Technical Reviewer.

#### Scope

This standard is for use by FSC certified companies aiming to avoid sourcing illegally harvested wood, wood harvested in violation of traditional and civil 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, wood from forests in which genetically modified tress are planted. The standard shall be applied to the uncertified material of FSC product group (herein referred to as wood) in the manufacturing, processing, transformation and trade of forest products carrying the FSC label. It shall also be applied by FSC chain of custody certified traders who wish to supply FSC Controlled Wood to FSC chain of custody certified operations for the purpose of mixing with FSC certified materials.

**NOTE:** This document details all the elements that are required to do the risk assessment. However, the document is divided into a "Restricted Information" section and a "Public Information" section. Only the information recorded in the "Public" section will be available on the FSC website. The information in the "Restricted" section will be covered by the Bureau Veritas Certification rules of confidentiality and will not be disclosed. The Risk Assessment requires a precautionary approach. Any area worldwide is therefore considered "unspecified risk" until "low risk" can be determined in line with the risk assessment set out here under (refer Section 1.1 of FSC-STD-40-005)

#### The following is important:

- 1. The Risk Assessment shall begin at the broadest relevant scale. If conditions at a given scale are not sufficiently homogeneous to establish low risk, the scale shall be further decreased. The Risk Assessment shall be continued at decreasing scales until conditions are sufficiently homogeneous.
- 2. Risk designation may be possible at a national level under certain homogenous conditions, whereas under more heterogeneous conditions, risk designation may only be possible at a district or local level and/or at the level of subsets of eco-regions.
- 3. District is an area of particular biogeographic region within a country of concern. Risk assessment is prepared for each Country of Wood Origin and is based on FSC global risk assessment and on approved risk assessment made for the same Country, Districts and Pulp producer and/or supplier.
- 4. If more than one supplier is from the same low risk country only one risk assessment need to be completed for the specific country.
- 5. The document shall be completed in one of the two official language of FSC (English or Spanish).

**Restricted Information: The following data will not be published:** 

The list of suppliers in the country and district assessed.

## Public Information: The following data shall be published:

This risk assessment shall contain consistent information compared to FSC Global Risk Registry (http://www.globalforestregistry.org/) related to the five FSC Controlled Wood categories. In cases where Company classifies sourcing areas differently from the risk category indicated in the FSC Global Risk Registry, the company shall give clear justifications and evidences.

### 1. ILLEGALLY HARVESTED WOOD

The supply area may be considered low risk in relation to illegal harvesting when all of the following indicators related to forest governance are met.

	Requirements	Sources of information	Finding&Evidence	Result
1.1	Evidence of enforcement of logging related laws in the supply area.  a) The organization shall use the 'Minimum list of applicable laws, regulations and nationally- ratified international treaties, conventions and agreements' (Table A, below) for the identification of logging related laws in the supply area under evaluation.  b) The organization may use existing national lists from approved FSC National Forest Stewardship Standards and other reputable sources in order to compile the list.  Where the FSC Global Forest Registry contains an FSC approved list of applicable laws for a country, it is mandatory to use this list.	<ul> <li>FSC network partners and regional offices (contacts: ic.fsc.org)</li> <li>The Royal Institute of International Affairs (www.illegal-logging.info)</li> <li>Environmental Investigation Agency (www.eia-international.org)</li> <li>Global Witness (www.globalwitness.org)</li> <li>Telapak (for Indonesiawww.telapak.org)</li> <li>UK Government's Department for International Development (DFID)</li> <li>EU FLEGT process (http://www.euflegt.efi.int/home)</li> <li>Transparency International Corruption Perception Index (www.transparency.org)</li> <li>WWF (wwf.panda.org)</li> <li>ELDIS regional and country profiles (www.eldis.org)</li> <li>CITES (www.cites.org)</li> <li>NGOs and involved stakeholders</li> <li>NOTE!</li> <li>Company conducting risk assessments shall use the "Minimum list of applicable laws, regulations and nationally ratified international treaties, conventions and agreements" (Table A FSC-STD-40-005, page 27).</li> </ul>	See National Risk Assessment As a result of onsite audit to the region of wood supply and after consultation with authorities and visiting the harvest sites in field, Bureau Veritas confirms that the wood coming through the stated channels and from the specified area in scope of risk assessment, can be considered Low Risk.	Low Risk

		2. Where the Global Forest Registry (http://www.globalforestregistry.org) contains an FSC approved list of applicable laws for a country, it is mandatory to use this list.		
1.2	There is evidence in the supply area demonstrating the legality of harvests and wood purchases including, for example, robust and effective systems for granting licenses and harvest permits.	www.panda.org www.eldis.org www.cites.org	See National Risk Assessment As a result of on-site audit to the region of wood supply and after consultation with authorities and visiting the harvest sites in field, Bureau Veritas confirms that the wood coming through the stated channels and from the specified area in scope of risk assessment, can be	Low Risk
1.3	There is little or no evidence or reporting of illegal harvesting in the supply area.	www.illegal-logging.org	considered Low Risk.  See National Risk Assessment As a result of on-site audit to the region of wood supply and after consultation with authorities and visiting the harvest sites in field, Bureau Veritas confirms that the wood coming through the stated channels and from the specified area in scope of risk assessment, can be considered Low Risk.	Low Risk
1.4	There is a low perception of corruption related to the granting or issuing of harvesting permits and other areas of law enforcement related to harvesting and wood trade.  The annually published Transparency International Corruption Perception Index (CPI) shall be used. Countries with a score of less than 50 shall be considered unspecified risk, unless there is specific independent and credible information at a lower scale	www.transparency.org	See National Risk Assessment As a result of on-site audit to the region of wood supply and after consultation with authorities and visiting the harvest sites in field, Bureau Veritas confirms that the wood coming through the stated channels and from the specified area in scope of risk assessment, can be considered Low Risk	Low Risk

(e.g. implemented independent tim tracking systems) that demonstrathe contrary.		

General requirements for risk assessment:

- a) An area shall be considered unspecified risk when illegal harvesting is a threat to the forest, people, or communities. Minor infractions and issues such as minor geographical deviations from the allotted area of harvesting, late filing of paperwork, or small infractions related to transport should not result in a designation of unspecified risk.
- b) The evaluation of risk for illegal harvesting shall include consideration of at least the following:
- The perceived level of corruption related to forest activities;
- -The degree of transparency about information that is likely to reveal or reduce illegal harvesting if made public;
- -The degree to which key data and documents relevant to illegal harvesting exist and are of satisfactory quality; and
- -Independent reports about illegal harvesting.

#### 2. WOOD HARVESTED IN VIOLATION OF TRADITIONAL OR CIVIL RIGHTS

2 The supply area may be considered low risk in relation to the violation of traditional and human rights when all of the following indicators are met:

	Requirements	Sources of information	Finding&Evidence	Result
2.1	There is no UN Security Council ban on timber exports from country concerned	www.un.org/esa/africa/UNNews Africa/timb er.htm www.globalwitness.org/pages/en/forests.html	. See National Risk Assessment	Low Risk
2.2	The country or supply area is not designated a source of conflict timber (e.g. USAID Type 1 conflict timber).	www.usaid.gov/search (conflict timber) www.natural resources.org	See National Risk Assessment	Low Risk
2.3	There is no evidence of child labour or violation of ILO Fundamental Principles and Rights at Work taking place in forest areas in the assessed supply area.	FSC network partners and regional offices (contacts: ic.fsc.org)     http://www.ilo.org (Global Child labor trends)	See National Risk Assessment As a result of on-site audit to the region of wood supply and after consultation with authorities and visiting the harvest sites in field, Bureau Veritas confirms that the wood coming through the stated channels and from the specified area in scope of risk assessment, can be considered Low Risk.	Low Risk
2.4	There are recognized and equitable	- FSC network partners and regional offices (contacts: ic.fsc.org)	See National Risk Assessment As a result of on-site audit to the region of wood supply and after consultation with	Low Risk

	processes (A process in which there are functioning means of recourse and/or there are no overwhelming structural imbalances or inherent unfairness.  Examples of processes include land claims negotiations, judicial procedures and treaty negotiations) in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the assessed supply area (Indigenous Peoples, workers, communities and government within the supply area accept and endorse the structure for addressing and resolving these issues; and communities and/or Indigenous Peoples have recognized power to mitigate any threats of harvesting through legal systems or other authorities);	<ul> <li>Indigenous Peoples' organizations</li> <li>Local community associations</li> <li>National Sources (e.g. records of land claims negotiation concluded or in progress, summaries of court decisions)</li> </ul>	authorities and visiting the harvest sites in field, Bureau Veritas confirms that the wood coming through the stated channels and from the specified area in scope of risk assessment, can be considered Low Risk.	
2.5	There is no evidence of violation of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in the forest areas in the supply area concerned.  The standard does not refer to the ratification of ILO 169 and a risk assessment shall involve an assessment of evidence of violation of ILO requirements, irrespective of whether or not they have been ratified by the country in which the risk assessment is made.	<ul> <li>FSC network partners and regional offices (contacts: ic.fsc.org)</li> <li>ILO country offices</li> </ul>	See National Risk Assessment As a result of on-site audit to the region of wood supply and after consultation with authorities and visiting the harvest sites in field, Bureau Veritas confirms that the wood coming through the stated channels and from the specified area in scope of risk assessment, can be considered Low Risk.	Low Risk

**NOTE:** Traditional rights may include rights which result from a long series of habitual or customary actions, constantly repeated, which have, by such repetition and by uninterrupted acquiescence, acquired the force of a law within a geographical or sociological unit. An example of a traditional right related to forests is access for local communities to forest areas to visit sacred and ritual sites.

### 3. WOOD HARVESTED FROM FOREST IN WHICH HIGH CONSERVATION VALUES ARE THREATENED BY MANAGEMENT ACTIVITIES

3 The district of origin may be considered low risk in relation to threat to high conservation values if: a) indicator 3.1 is met; or b) indicator 3.2 eliminates (or greatly mitigates) the threat posed to the district of origin by non-compliance with 3.1.

Requirements	Sources of information	Finding&Evidence	Result
Forest management activities at the relevant level (ecoregion, sub ecoregion, local) do not threaten eco regionally significant HCVs.  The organization shall first assess whether any HCVs are threatened at the ecoregional level. If any HCVs are threatened at the ecoregional level, the organization shall assess how forest management activities relate to these HCVs at the supply area level.  For the risk assessment of this category the identification of ecoregionally significant HCVs is required, which in practical terms implies that locally relevant values are not in the focus of this step of the risk assessment.  Threatened ecoregions can bidentified through the supporting information that references, but is not limited to e.g. Biodiversity Hotspots Global 200 Ecoregion, Frontie Forest, Intact Forest Landscapes.  Regarding Intact Forest Landscapes firefighting or fire prevention for the protection of public safety is no considered to be an economic activity of minimal disturbance. Fire control in the context of forest management activities is no considered to be an economic activity of minimal disturbance.  Low risk for this indicator may be demonstrated as follows:	- Ecoregion definition and information (www.worldwildlife.org/biomes)  - Regions identified by Conservation International as a Biodiversity Hotspot, or ecosystems and communities that are explicitly identified by Conservation International as a key component of a Biodiversity Hotspot  Forest, woodland, or mangrove ecoregions identified by World Wildlife Fund as a Global 200 Ecoregion and assessed by WWF as having a conservation status of endangered or critical. If the Global 200 Ecoregion comprises more than a single terrestrial ecoregion, an ecoregion within the Global 200 Ecoregion can be considered low risk if the sub-ecoregion has a Conservation Status other than 'critical' or 'endangered' (www.worldwildlife.org/science/wildfinder)  - Regions identified by the World Conservation Union (IUCN) as a Centre of Plant Diversity  - Regions identified by Conservation International as a High Biodiversity Wilderness Area that contain contiguous forest ecosystems greater than 500 km <sup>2</sup> - Regions identified by the World Resources Institute as a Frontier Forest  Intact Forests Landscapes, as identified by Greenpeace (www.intactforests.org)	See National Risk Assessment As a result of on-site audit to the region of wood supply and after consultation with authorities and visiting the harvest sites in field, Bureau Veritas confirms that the wood coming through the stated channels and from the specified area in scope of risk assessment, can be considered Low Risk.	Low Risk

a) Material does not originate from any of the mapped areas of HCVs (as listed in 3.1), or  b) There are no ecoregionally significant HCVs in the supply area according to independent verifiable information at the supply areas/supply unit level (NGO reports, environmental information at the supply areas/supply areas/supply areas/supply unit level (NGO reports, environmental information and legislation) is in place that ensures survival of the HCVs in the ecoregion.  Low risk for this indicator shall be demonstrated as follows:  a) A strong system of protection of HCVs is in place. The definition of strong shall be based on the effectiveness of law enforcement in the country. This can be demonstrated through a high rating (≥ 75%) in the World Bank "rule of law" indicativegional stakeholders from the assessed supply area, or  c) The forest manager has agreed to an approach of HCV protection at the supply unit level with national/regional environmental stakeholders relevant for the assessed supply interval environmental stakeholders relevant for the assessed supply interval environmental stakeholders relevant for the assessed supply area, or  a) The forest manager has agreed to an approach of HCV protection at the supply unit level with national/regional environmental stakeholders relevant for the assessed supply area, or  c) The forest manager has agreed to an approach of HCV protection at the supply unit level with national/regional environmental stakeholders relevant for the assessed supply area, or  c) The forest manager has agreed to an approach of HCV protection and relevant for the assessed supply area, or  c) The forest manager has agreed to an approach of HCV protection and relevant for the assessed supply area, or  c) The forest manager has agreed to an approach of HCV protection and virial manager has agreed to an approach of HCV protection and virial manager has agreed to an approach of HCV protection and virial manager has agreed to an approach of HCV protection and virial manager has agreed to an appr					1
3.2 A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the ecoregion. Low risk for this indicator shall be demonstrated as follows:  a) A strong system of protection of HCVs is in place. The definition of strong shall be based on the effectiveness of law enforcement in the country. This can be demonstrated through a high rating (≥ 75%) in the World Bank rule of law index (www.govindicators.org), and  b) There is significant support by relevant national/regional stakeholders from the assessed supply area, or  c) The forest manager has agreed to an approach of HCV protection at the supply unit level with national/regional environmental stakeholders relevant for the assessed		from any of the mapped areas of HCVs (as listed in 3.1), or  b) There are no ecoregionally significant HCVs in the supply area according to independent verifiable information at the supply area/supply unit level (NGO reports, environmental			
d) Indicator 3.2 cannot be met if	3.2	A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the ecoregion.  Low risk for this indicator shall be demonstrated as follows:  a) A strong system of protection of HCVs is in place. The definition of strong shall be based on the effectiveness of law enforcement in the country. This can be demonstrated through a high rating (≥ 75%) in the World Bank 'rule of law' index (www.govindicators.org), and  b) There is significant support by relevant national/regional stakeholders from the assessed supply area, or  c) The forest manager has agreed to an approach of HCV protection at the supply unit level with national/regional environmental stakeholders relevant for the assessed supply area.	(contacts: ic.fsc.org)  Signatory to the Convention on Biological Diversity and demonstrable progress towards completing a network of protected areas, such as an overall positive analysis of the latest country thematic report on Forest Ecosystems (www.cbd.int)  www.fsc.org  www.greenpeace.com	result of on-site audit to the region of wood supply and after consultation with authorities and visiting the harvest sites in field, Bureau Veritas confirms that the wood coming through the stated channels and from the specified area in scope of risk assessment, can be	

there is substantial objection		
from relevant national or		
regional stakeholders against a		
low risk designation for the		
HCV category.		

NOTE 1: Threat in the context of this annex means having an uncertain chance of continued survival or presence of HCVs at the ecoregion level. This standard requires the identification of threats to HCVs caused by forest management activities.

NOTE 2: There is no difference in the definition of HCVs and their different categories between the FSC Principles and Criteria (FSC-STD-01-001) and this standard. The difference relates to the objectives of both standards. While the FSC Principles and Criteria require the maintenance and enhancement of HCVs at the management unit level, this standard requires the organization to avoid material from forests where HCVs are being threatened at the ecoregional level.

General requirements for risk assessment:

a) HCVs that provide basic services of nature in critical situations and those that are fundamental to meeting basic needs of local communities can be considered low risk, if indicators 2.4, and 3.1 and/or 3.2 are met. That is, there are recognizable and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the supply area concerned.

# 4. WOOD HARVESTED FROM AREAS BEING CONVERTED FROM FORESTS AND OTHER WOODED ECOSYSTEMS TO PLANTATIONS OR NON-FOREST USES

4 The supply area may be considered low risk in relation to conversion of forest to plantations or non-forest uses when the following indicator is met: *NOTE: the change from plantations to other land uses is not considered forest conversion.* 

	Requirements	Sources of information	Finding&Evidence	Result
4.1	There is no net loss and no significant rate of loss (>0,5 % per year) of natural forests and other naturally wooded ecosystems such as savannah taking place in the ecoregion in question  The rate (i.e. > 0.5%) may be adjusted as additional information becomes available.  Note: FAO forest cover data and statistics may not consider forest conversion to plantation as a loss of forest cover. Therefore, in an area with extensive conversion of natural forest to plantation, the data might not show a significant rate of forest loss and could thus be misleading in the context of this standard.	<ul> <li>FAO GOFC-GOLD Global Observation of Forest and Land Cover Dynamics<sub>17</sub></li> <li>FAO Global Forest Resources Assessment</li> <li>Conservation International Regional Analysis Program</li> <li>University of Maryland Department of Geography</li> <li>UNEP/GRID – Division of Early Warning and Assessment</li> <li>SERVIR – Regional Monitoring and Visualization System for Mesoamerica</li> <li>Congo Basin Forest Partnership and CARPE</li> <li>CEC Joint Research Centre</li> <li>INPE-PRODES – Brazil's National Institute for Space Research</li> <li>Hansen, M., DeFries, R., Townshend, J.R., Carroll, M., Dimiceli, C., Sohlberg, R. 2003. 500 m MODIS Vegetation Continuous Fields. College Park, Maryland: The Global Land Cover Facility</li> <li>National data sources</li> <li>ftp://ftp.fao.org</li> <li>www.fsc.org</li> </ul>	See National Risk Assessment	Low Risk

NOTE: The intent of the risk assessment for this category is to reveal risk in regions where there is a significant occurrence of deforestation of natural forests. The organization is encouraged to seek for guidance from FSC network partners and regional offices on the interpretation of 'significant rate of loss' for forests in their countries and regions.

#### 5. WOOD FROM FORESTS IN WHICH GENETICALLY MODIFIED TREES ARE PLANTED

5 The supply area may be considered low risk in relation to wood from genetically modified trees when one of the following indicators is met:

	Requirements	Sources of information	Finding&Evidence	Result
a)	There is no commercial use of genetically modified trees of the species being sourced; or	- FAO, 2004. Preliminary review of biotechnology in forestry, including genetic modification. Forest Genetic Resources Working Paper FGR/59E. Forest Resources Development Service, Forest Resources Division, Rome, Italy ( <a href="http://www.fao.org/docrep/008/ae574e/AE574E00.HTM">http://www.fao.org/docrep/008/ae574e/AE574E00.HTM</a> ) - National and regional data sources	See National Risk Assessment	Low Risk
b)	Licenses are required for commercial use of genetically modified trees and there are no licenses for commercial use of the species being sourced; or	http://www.fao.org/docrep/008/ae574e/AE574E00.HT M http://www.wrm.org.uy http://www.fao.org/docrep/008/ae574e/AE574E00.HT M	See National Risk Assessment	Low Risk
c)	It is forbidden to use genetically modified trees commercially in the country concerned.	http://www.fao.org/docrep/008/ae574e/AE574E00.HT  M http://www.wrm.org.uy http://www.fao.org/docrep/008/ae574e/AE574E00.HT M	See National Risk Assessment	Low Risk