### SEEF (Société équatoriale d'exploitation forestière)

**Timber and pulp assessment**

**Total score:** 0.8%

**Latest update:** July 2019  
**Next scheduled:** July 2020

<table>
<thead>
<tr>
<th>Landbank</th>
<th>470,000 hectares</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thomson Reuters ticker:</td>
<td>Private company</td>
</tr>
<tr>
<td>Bloomberg ticker:</td>
<td>Private company</td>
</tr>
<tr>
<td>Activities:</td>
<td>Timber production, timber processing</td>
</tr>
<tr>
<td>Locations:</td>
<td>Gabon</td>
</tr>
<tr>
<td>Headquarters:</td>
<td>Gabon</td>
</tr>
</tbody>
</table>

| Total:            | 1 / 127          | 0.8% |

#### Sustainability policy and leadership

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Score</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Sustainable forestry policy or commitment for all its operations?</td>
<td>✗ 0 / 1 No source</td>
<td></td>
</tr>
<tr>
<td>2. Sustainability policy or commitment applies to all sourcing?</td>
<td>✗ 0 / 1 No source</td>
<td></td>
</tr>
<tr>
<td>3. High-level position of responsibility for sustainability?</td>
<td>✗ 0 / 1 No source</td>
<td></td>
</tr>
<tr>
<td>4. One or more board members have responsibility for sustainability?</td>
<td>✗ 0 / 1 No source</td>
<td></td>
</tr>
<tr>
<td>5. Percentage or number of women board members?</td>
<td>✗ 0 / 1 No source</td>
<td></td>
</tr>
<tr>
<td>6. Percentage or number of women in senior management team?</td>
<td>✗ 0 / 1 No source</td>
<td></td>
</tr>
<tr>
<td>7. Sustainability report published within last two years?</td>
<td>✗ 0 / 1 No source</td>
<td></td>
</tr>
<tr>
<td>8. Member of multiple industry schemes or other external initiatives to improve forest management or transparency?</td>
<td>✗ 0 / 1 No source</td>
<td></td>
</tr>
<tr>
<td>9. Activities with government, NGOs or academic institutions to improve the sustainability of forest products?</td>
<td>✗ 0 / 1 No source</td>
<td></td>
</tr>
<tr>
<td>10. Climate risks assessment available?</td>
<td>✗ 0 / 1 No source</td>
<td></td>
</tr>
</tbody>
</table>
## 11. Natural capital assessment available?

- **Available?** No

## Landbank, mills and traceability

<table>
<thead>
<tr>
<th>Question</th>
<th>Available?</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>12. Lists countries and operations?</strong></td>
<td>No</td>
<td>Source</td>
</tr>
<tr>
<td>The company does not have a website, but external sources suggest the company has forestry operations in Gabon.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>13. Total area of natural forest designated for wood/wood fibre production (ha)?</strong></td>
<td>No</td>
<td>Source</td>
</tr>
<tr>
<td>The company does not have a website, but external sources suggest that the company has approximately 470,000 ha of concessions.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>14. Total area of forest plantation (ha)?</strong></td>
<td>No</td>
<td></td>
</tr>
<tr>
<td><strong>15. Area of plantation/natural forest within outgrower schemes (ha)?</strong></td>
<td>No</td>
<td></td>
</tr>
<tr>
<td><strong>16. Unplanted (areas designated for future development as plantation forest) (ha)?</strong></td>
<td>No</td>
<td></td>
</tr>
<tr>
<td><strong>17. Conservation set-aside and/or HCV area (ha)?</strong></td>
<td>No</td>
<td></td>
</tr>
<tr>
<td><strong>18. Area of Intact Forest Landscape (ha)?</strong></td>
<td>No</td>
<td></td>
</tr>
<tr>
<td><strong>19. Number of Forest Management Units (FMUs)?</strong></td>
<td>P 0.5</td>
<td>Source</td>
</tr>
<tr>
<td>Two concessions belonging to the company are listed in WRI Forest Atlas datasets, however it is unclear whether this accounts for all operations.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>20. Maps of forest management units (FMUs)?</strong></td>
<td>P 0.5</td>
<td>Source</td>
</tr>
<tr>
<td>Two concessions belonging to the company are listed in WRI Forest Atlas datasets, however it is unclear whether this accounts for all operations.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>21. Forest management plans available for all FMUs?</strong></td>
<td>No</td>
<td></td>
</tr>
<tr>
<td><strong>22. Monitoring of forest management plan implementation?</strong></td>
<td>No</td>
<td></td>
</tr>
<tr>
<td><strong>23. Company has provided valid legal documents to Open Timber Portal on use rights (at the time of SPOTT assessments)?</strong></td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>This indicator is disabled as external sources suggest that the company doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>24. Company has provided valid legal documents to Open Timber Portal on forest management (at the time</strong></td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

Landbank, mills and traceability.
<table>
<thead>
<tr>
<th>Indicator</th>
<th>Score</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>25. Company has provided valid legal documents to Open Timber Portal on timber harvesting (at the time of SPOTT assessments)?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>26. Number of company owned pulp and paper mills?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>27. Maps or addresses of company owned pulp and paper mills?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>28. Number of company owned sawmills?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>29. Maps or addresses of company owned sawmills?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>30. Number of supplier mills?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>31. Maps or addresses of supplier mills?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>32. Procedures to trace raw materials to country of harvest?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>33. Procedures to trace raw materials to FMU level?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>34. Percentage of supply traceable to country level (above 80%)?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>35. Percentage of supply traceable to FMU level (above 75%)?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>36. Commitment to zero conversion of natural forest?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>37. Zero conversion commitment applies to all sourcing?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>38. Commitment to minimise the impact of logging roads?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>39. Commitment to protect forest areas from illegal activities?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>Indicator</td>
<td>Score</td>
<td>Source</td>
</tr>
<tr>
<td>-----------</td>
<td>-------</td>
<td>--------</td>
</tr>
<tr>
<td>40. Evidence of monitoring deforestation?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>41. Amount of deforestation recorded?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>42. Commitment to biodiversity conservation?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>43. Examples of species and/or habitat conservation management?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>44. Implementing a landscape-level approach to biodiversity conservation?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>45. Identified species of conservation concern referencing international or national system of species classification?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>46. Commitment to sustainably manage the use of non-timber forest products (NTFPs)?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>47. Commitment not to use genetically modified organisms?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>48. Commitment to conduct High Conservation Value (HCV) assessments?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>49. HCV commitment applies to all sourcing?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>50. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network’s Assessor Licensing Scheme (ALS)?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>51. High Conservation Value (HCV) assessments available?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>52. High Conservation Value (HCV) management and monitoring plans available?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>53. Commitment to the High Carbon Stock (HCS) Approach?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>54. High Carbon Stock (HCS) assessments available?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td>55. Commitment to conduct social and environmental impact assessments (SEIAs)?</td>
<td>X</td>
<td>0 / 1</td>
</tr>
<tr>
<td></td>
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<tr>
<td>---</td>
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<td>---</td>
</tr>
<tr>
<td>56. Social and environmental impact assessments (SEIAs) available?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>57. Company has provided valid legal documents to Open Timber Portal on impact assessments (at the time of SPOTT assessments)?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>58. Commitment to best management practices for soils and/or peat?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>59. Commitment to reduced impact logging?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>60. Commitment to no planting on peat of any depth?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>61. Commitment on peatland planting applies to all sourcing?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>62. Landbank or planted area on peat (ha)?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>63. Evidence of best management practices for soils and/or peat?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>64. Commitment to zero burning?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>65. Commitment to zero burning applies to all sourcing?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>66. Evidence of management and monitoring fires?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>67. Details/number of hotspots/fires in FMUs controlled by the company?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>68. Time-bound commitment to reduce GHG emissions intensity?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>69. Progress towards reducing GHG emission intensity?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>70. Report GHG emissions from land use change?</td>
<td>×</td>
<td>0 / 1</td>
</tr>
<tr>
<td>71. Methodology used to calculate GHG emissions?</td>
<td>×</td>
<td>0 / 1</td>
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</table>
### Water, chemical and waste management

<table>
<thead>
<tr>
<th>Question</th>
<th>Score</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>72. Time-bound commitment to improve water quality (BOD and COD)?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>73. Progress towards commitment on water quality (BOD and COD)?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>74. Commitment to protection of natural waterways through buffer zones?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>75. Evidence of treatment of pulp and paper mill effluent?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>76. Evidence of sawmill run-off containment and wastewater treatment?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>77. Time-bound commitment to improve water use intensity?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>78. Progress towards commitment on water use intensity?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>79. Commitment to eliminate chlorine and chlorine compounds for bleaching?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>80. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>81. No use of World Health Organisation (WHO) Class 1A and 1B pesticides?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>82. No use of chemicals listed under the Stockholm Convention and Rotterdam Convention?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>83. Integrated Pest Management (IPM) approach?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>84. Chemical usage per ha or list of chemicals used?</td>
<td>✗</td>
<td>No source</td>
</tr>
</tbody>
</table>

### Community, land and labour rights

<table>
<thead>
<tr>
<th>Question</th>
<th>Score</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>85. Commitment to human rights, referencing the UN Declaration on Human Rights or UN Guiding Principles on Business and Human Rights?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>86. Commitment to human rights applies to all sourcing?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>87. Commitment to respect indigenous and local communities' rights?</td>
<td>✗</td>
<td>No source</td>
</tr>
<tr>
<td>Indicator</td>
<td>Score</td>
<td>Source</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------</td>
<td>-------</td>
<td>--------</td>
</tr>
<tr>
<td>88. Commitment to respect legal and customary property rights?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>89. Commitment to free, prior and informed consent (FPIC)?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>90. FPIC commitment applies to independent suppliers?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>91. Details of free, prior and informed consent (FPIC) process available?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>92. Examples of local stakeholder engagement to prevent conflicts?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>93. Details of process for addressing land conflicts available?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>94. Commitment to support the inclusion of women across forestry operations, including addressing barriers faced?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>95. Commitment to provide essential community services and facilities?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>96. Company has provided valid legal documents to Open Timber Portal on population rights (at the time of SPOTT assessments)?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>This indicator is disabled as external sources suggest that the company doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>97. Commitment to respect all workers' rights?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>98. Reference to Fundamental ILO Conventions?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>99. Commitment to eliminate gender related discrimination with regards to employment and occupation?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>100. Company has provided valid legal documents to Open Timber Portal on labour regulations (at the time of SPOTT assessments)?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>This indicator is disabled as external sources suggest that the company doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>101. Percentage or number of temporary employees?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>102. Percentage or number of women employees?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>103. Payment of minimum wage?</td>
<td>×</td>
<td>No source</td>
</tr>
<tr>
<td>No.</td>
<td>Question</td>
<td>Status</td>
</tr>
<tr>
<td>-----</td>
<td>--------------------------------------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>104</td>
<td>Reporting of salary by gender?</td>
<td>No</td>
</tr>
<tr>
<td>105</td>
<td>Commitment to address occupational health and safety, referencing the ILO Code of Practice on Safety and Health in Forestry Work?</td>
<td>No</td>
</tr>
<tr>
<td>106</td>
<td>Time lost due to work-based injuries?</td>
<td>No</td>
</tr>
<tr>
<td>107</td>
<td>Number of fatalities as a result of work-based accidents?</td>
<td>No</td>
</tr>
<tr>
<td>108</td>
<td>Provision of personal protective equipment and related training?</td>
<td>No</td>
</tr>
<tr>
<td>109</td>
<td>Time-bound plan for achieving 100% third-party legality verification of FMUs or achieved?</td>
<td>No</td>
</tr>
<tr>
<td>110</td>
<td>Time-bound plan to source only wood/wood fibre that is in legal compliance verified by a third party?</td>
<td>No</td>
</tr>
<tr>
<td>111</td>
<td>Percentage area (ha) verified as being in legal compliance by a third party?</td>
<td>No</td>
</tr>
<tr>
<td>112</td>
<td>Percentage of all wood/wood fibre supply traded/processed verified as being in legal compliance by a third party?</td>
<td>No</td>
</tr>
<tr>
<td>113</td>
<td>Time-bound plan for achieving 100% FSC FM certification of FMUs or achieved 100% FSC-certification of FMUs?</td>
<td>No</td>
</tr>
<tr>
<td>114</td>
<td>Commitment to source only wood/wood fibre that meets FSC Controlled Wood requirements?</td>
<td>No</td>
</tr>
<tr>
<td>115</td>
<td>Percentage area (ha) FSC FM certified?</td>
<td>No</td>
</tr>
<tr>
<td>116</td>
<td>Percentage of wood/wood fibre supply from outgrower scheme and/or independent suppliers that is FSC FM certified?</td>
<td>No</td>
</tr>
<tr>
<td>117</td>
<td>Percentage of all wood/wood fibre supply traded/processed that are FSC certified (above 75%)?</td>
<td>No</td>
</tr>
<tr>
<td>118</td>
<td>Percentage area (ha) PEFC certified (excluding FSC certified area)?</td>
<td>No</td>
</tr>
</tbody>
</table>
### Smallholders and suppliers

<table>
<thead>
<tr>
<th>Question</th>
<th>Score</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>119. Programme to support outgrower scheme smallholders?</td>
<td>x</td>
<td>No source</td>
</tr>
<tr>
<td>120. Percentage of outgrower scheme smallholders involved in programme?</td>
<td>x</td>
<td>No source</td>
</tr>
<tr>
<td>121. Process used to prioritise, assess and/or engage suppliers on compliance with company’s policy and/or legal requirements?</td>
<td>x</td>
<td>No source</td>
</tr>
<tr>
<td>122. The company has a Due Diligence System (DDS)?</td>
<td>x</td>
<td>No source</td>
</tr>
<tr>
<td>123. Suspension or exclusion criteria for suppliers?</td>
<td>x</td>
<td>No source</td>
</tr>
<tr>
<td>124. Percentage of suppliers assessed and/or engaged on compliance with company requirements?</td>
<td>x</td>
<td>No source</td>
</tr>
</tbody>
</table>

### Governance and grievances

<table>
<thead>
<tr>
<th>Question</th>
<th>Score</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>125. Commitment to ethical conduct and prohibition of corruption?</td>
<td>x</td>
<td>No source</td>
</tr>
<tr>
<td>126. Company has provided valid legal documents to Open Timber Portal on legal registration (at the time of SPOTT assessments)?</td>
<td>x</td>
<td>No source</td>
</tr>
<tr>
<td>This indicator is disabled as external sources suggest that the company doesn’t operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this</td>
<td></td>
<td></td>
</tr>
<tr>
<td>127. Disclosure of the company’s management approach to tax and payments to governments?</td>
<td>x</td>
<td>No source</td>
</tr>
<tr>
<td>128. Company has provided valid legal documents to Open Timber Portal on taxes, fees and royalties (at the time of SPOTT assessments)?</td>
<td>x</td>
<td>No source</td>
</tr>
<tr>
<td>This indicator is disabled as external sources suggest that the company doesn’t operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this</td>
<td></td>
<td></td>
</tr>
<tr>
<td>129. Whistleblowing procedure?</td>
<td>x</td>
<td>No source</td>
</tr>
<tr>
<td>130. Own grievance or complaints system open to all stakeholders?</td>
<td>x</td>
<td>No source</td>
</tr>
<tr>
<td>131. Details of grievances disclosed?</td>
<td>x</td>
<td>No source</td>
</tr>
</tbody>
</table>