

Bracell

Total score:

55%

Latest update: July 2020

Next scheduled: July 2021

About this company:	A subsidiary of RGE Group, and sister company to APRIL Group and Asian Agri Group , Bracell is headquartered in Hong Kong. With plantations in Brazil, the company is engaged in pulpwood and dissolving pulpwood production.
Parent company:	RGE Group
Landbank	100,829 hectares
Thomson Reuters ticker:	Private company
Bloomberg ticker:	Private company
Activities:	Timber production; Pulpwood production
Locations:	Brazil (São Paulo and Bahia)
Headquarters:	Hong Kong
Related companies:	Sister company of APRIL and Asian Agri (SPOTT palm oil company)
Parent website:	http://www.rgei.com/
Website:	https://www.bracell.com Latest annual report (2018) Sustainability report (2018)



> Sustainability policy and leadership

7.5 / 10 75%

2 media reports

1. Sustainable forestry policy or commitment for all its operations?

✓ 1 / 1 [Source](#)

2. Sustainable forestry policy or commitment applies to all suppliers?

The company's 2019 Sustainability Policy requires service providers to comply with local laws and regulations, and its 2018 policy requires suppliers to comply with human rights commitments among other expectations. However, there is no requirement for suppliers to comply with the whole policy and/or set of commitments covering a comprehensive range of both environmental and social issues.

P 0.5 / 1 [Source](#)

3. High-level position of responsibility for sustainability?

The company has Corporate Affairs and Sustainability managers.

✓ 1 / 1 [Source](#)

4. One or more members within the board of the company have responsibility for sustainability?

This indicator is disabled as the company is private.

5. Percentage or number of women in senior management team?

Company's operations in Bahia has 24% and 16% of women in leadership positions in forestry and industrial activities respectively whereas in São Paulo there are 17% of women in leadership positions, each in the forestry and industrial activities.

✓ 1 / 1 [Source](#)

6. Percentage or number of women board members?

This indicator is disabled as the company is private.

	✓ 1 / 1 Source
<p>7. Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with timber and pulp production? UNGC, FSC (Copener Florestal, Subsidiary of Bracell), IBA.</p>	
	✓ 1 / 1 Source
<p>8. Collaboration with stakeholders to reduce negative environmental or social outcomes associated with timber and pulp production? The company is involved in various activities with academic institutions (e.g. biodiversity monitoring, education on environmental protection), NGOs (e.g. environmental education programme) and local government (e.g. riparian forests restoration).</p>	
	✓ 1 / 1 Source
<p>9. Sustainability report published within last two years? Published in 2018.</p>	
	✓ 1 / 1 Source
<p>10. Reports through standardised reporting systems?</p>	
	✗ 0 / 1
<p>11. Climate risks assessment available?</p>	
	✗ 0 / 1
<p>12. Natural capital assessment available?</p>	



> Landbank, maps and traceability

10.5 / 17 61.8%

1 media report

	✓ 1 / 1 Source
<p>13. Lists countries and operations? Brazil (Bahia and Sao Paulo).</p>	
<p>14. Lists countries sourcing from? This indicator is disabled as the company reports that it does not trade wood/wood fibre.</p>	
<p>15. Total area of natural forest designated for wood/wood fibre production (ha)? This indicator is disabled as the company reports that it only produces wood/wood fibre from plantation forests.</p>	
	✓ 1 / 1 Source
<p>16. Total area of forest plantation (ha)? 100,829 - 100,829 ha is designated for production out of a total landbank of 215,561.</p>	
	✓ 1 / 1 Source
<p>17. Area of plantation/natural forest within outgrower schemes (ha)? 12,746 - Outgrower schemes cover an area of 39,854 ha, including 12,746 of eucalyptus plantation.</p>	
	✗ 0 / 1
<p>18. Unplanted (areas designated for future development as plantation forest) (ha)?</p>	

✓ 1 / 1 [Source](#)

■ **19. Conservation set-aside area, including HCV area (ha)?**

117,701 - The company in its Sustainability Report 2018 states it has 83,841 ha of preserved areas and contributes to the conservation of another 33,860 ha through a partnership with farmer members of the Forestry Partnership Program.

■ **20. Area of Intact Forest Landscape (ha)?**

This indicator is disabled as the company has informed ZSL that it doesn't have any intact forest landscapes within its landbank.

P 0.5 / 1 [Source](#)

■ **21. Number of Forest Management Units (FMUs)?**

380 - The company's FSC and PEFC-certification documents list 154 FMUs (farms/fazendas) in Bahia and 226 FMUs (farms/fazendas) in Sao Paulo. However, this only covers a total area of 226,229 ha which does not represent the company's total landbank of 239,546 ha.

P 0.5 / 1 [Source](#)

■ **22. Maps of forest management units (FMUs)?**

The company's PEFC (Cerflor) certification lists 154 FMUs with geo-referenced coordinates but for Sao Paulo region, only a static map is available representing the company's own, partnership and promoted landbanks.

✓ 1 / 1 [Source](#)

■ **23. Forest management plans available for all FMUs?**

A forest management plan is available only for the company's Sao Paulo operations.

P 0.5 / 1 [Source](#)

■ **24. Monitoring of forest management plan implementation available?**

Some monitoring information of the company's Forest Management Plans are available in FSC and PEFC audit reports, however, the scope of these reports does not cover all the company's FMUs.

■ **25. Company has provided valid legal documents to Open Timber Portal on use right (at the time of SPOTT assessments)?**

This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.

■ **26. Company has provided valid legal documents to Open Timber Portal on forest management (at the time of SPOTT assessments)?**

This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.

■ **27. Company has provided valid legal documents to Open Timber Portal on timber harvesting (at the time of SPOTT assessments)?**

This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.

P 0.5 / 1 [Source](#)

■ **28. Names and locations of all third-party supplying FMUs?**

The company has disclosed only a static map representing the company's own, partnership and promoted landbanks in Sao Paulo region.

■ **29. Number of company owned sawmills?**

This indicator is disabled as the company reports that it doesn't own sawmills.

■ **30. Names and locations of company owned sawmills?**

This indicator is disabled as the company reports that it doesn't own sawmills.

✓ 1 / 1 [Source](#)

31. Number of company-owned pulp and paper mills?

2 - The company is building a third mill in the inner state of São Paulo the construction of which should be completed by the end of 2021.

✓ 1 / 1 [Source](#)

32. Names and locations of company-owned pulp and paper mills?

33. Reports total volumes (or percentages) sourced by company-owned sawmills that come from company's own operations and/or third-parties?

This indicator is disabled as the company reports that it doesn't own sawmills.

P 0.5 / 1 [Source](#)

34. Reports total volumes (or percentages) sourced by company-owned pulp and paper mills that come from company's own operations and/or third-parties?

Pulp production reached 707,619 tons in 2018 but the company does not specify volumes or percentages which come from its own or third-party operations.

35. Number of third party supplying mills?

This indicator is disabled as the company reports that it doesn't source from supplying mills.

36. Names and locations of all third party supplying mills?

This indicator is disabled as the company reports that it doesn't source from supplying mills.

37. Reports total volume (or percentages) sourced from third-party supplying mills that come from the supplying mills' own operations and/or third parties?

This indicator is disabled as the company reports that it doesn't source from supplying mills.

P 0.5 / 1 [Source](#)

38. Procedures to trace raw materials to country of harvest?

The company has CoC certificates but it isn't clear if it covers all of the company's supply.

✗ 0 / 1 [Source](#)

39. Percentage of supply traceable to country of harvest?

The company has CoC certificates that cover some of its supply. However, the percentage of supply covered by certification cannot be calculated.

P 0.5 / 1 [Source](#)

40. Procedures to trace raw materials to FMU level?

The company has CoC certificates but it isn't clear if it covers all of the company's supply.

✗ 0 / 1 [Source](#)

41. Percentage of supply traceable to FMU level?

The company has CoC certificates that cover some of its supply. However, the percentage of supply covered by certification cannot be calculated.



> Certification standards

2 / 8 25.3%

✓ 1 / 1 [Source](#)

42. Time-bound plan for achieving 100% third-party legality verification of FMUs or achieved?

The company's operations are 100% PEFC-certified.

■ 43. Percentage area (ha) verified as being in legal compliance by a third party?	P	0.64 / 1	Source
■ 44. Time-bound plan to source only wood/wood fibre that is in legal compliance verified by a third party?	X	0 / 1	
■ 45. Percentage of all wood/wood fibre supply traded/processed verified as being in legal compliance by a third party?	X	0 / 1	
■ 46. Percentage area (ha) FSC FM certified?	X	0 / 1	Source
■ 47. Time-bound plan for achieving 100% FSC FM certification of FMUs or achieved 100% FSC-certification of FMUs?	X	0 / 1	
■ 48. Percentage of wood/wood fibre supply (tonnes) from all suppliers that comes from FSC FM certified areas?	X	0 / 1	
■ 49. Commitment to source only wood/wood fibre that meets FSC Controlled Wood and/or PEFC Controversial Sources requirements?	X	0 / 1	Source
■ 50. Percentage area (ha) PEFC certified (excluding FSC certified area)? 63.6% - 137,070.57 is PEFC-certified out of a total 215,561 ha.	P	0.64 / 1	Source



> Deforestation and biodiversity

12 78 / 22 58.1%

⚠️ 2 media reports

■ 51. Commitment to zero deforestation or zero conversion of natural ecosystems? The company has a commitment to no deforestation and a zero-burn policy.	✓	1 / 1	Source
■ 52. Commitment to zero deforestation or zero conversion of natural ecosystems applies to all suppliers?	✓	1 / 1	Source
■ 53. Criteria for defining deforestation? The company commits to keep the remnants of native forest by using the Mosaic Landscape Approach, in which native vegetation is preserved and physically protected from illegal hunting and logging. No cut-off date is specified.	P	0.5 / 1	Source
■ 54. Evidence of monitoring deforestation? The company provides limited details on monitoring the damage to the Permanent Preservation Areas (APP) and Legal Reserves (RL) for São Paulo region which doesn't cover the company's entire operations.	P	0.5 / 1	Source
■ 55. Amount of illegal/non-compliant deforestation recorded?	X	0 / 1	

<p><input type="checkbox"/> 56. Amount of illegal//non-compliant deforestation recorded in supplier operations?</p>	<p>✘</p>	<p>0 / 1</p>
<p><input type="checkbox"/> 57. Commitment to restoration of non-compliant deforestation/conversion?</p>	<p>✘</p>	<p>0 / 1</p>
<p><input type="checkbox"/> 58. Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers?</p>	<p>✘</p>	<p>0 / 1</p>
<p><input type="checkbox"/> 59. Implementing a landscape or jurisdictional level approach? [Externally verified] Points for external verification have been awarded on the basis of the company's PEFC-certification. As the International Standard's requirements do not fully meet the SPOTT indicator criteria limited, externally verified points have therefore been awarded for this indicator.</p>	<p>P</p>	<p>0.75 / 1 Source</p>
<p><input type="checkbox"/> 60. Commitment to biodiversity conservation?</p>	<p>✓</p>	<p>1 / 1 Source</p>
<p><input type="checkbox"/> 61. Commitment to biodiversity conservation applies to all suppliers?</p>	<p>✘</p>	<p>0 / 1</p>
<p><input type="checkbox"/> 62. Identified species of conservation concern, referencing international or national system of species classification? The company has identified species of conservation concern referencing the IUCN Red list and ICMBio.</p>	<p>P</p>	<p>0.75 / 1 Source</p>
<p><input type="checkbox"/> 63. Examples of species and/or habitat conservation management? The company preserves native vegetation using the Mosaic Landscape Approach, has a wildlife sighting program to maintain species database and identify potential threats from illegal encroachers and poachers in the environmental conservation areas. Points for external verification have also been awarded on the basis of the company's PEFC-certified landbank.</p>	<p>✓ +</p>	<p>1 / 1 Source 0.64 / 1</p>
<p><input type="checkbox"/> 64. Commitment to no hunting or only sustainable hunting of species?</p>	<p>✓</p>	<p>1 / 1 Source</p>
<p><input type="checkbox"/> 65. Commitment to no hunting or only sustainable hunting of species applies to all suppliers?</p>	<p>✘</p>	<p>0 / 1</p>
<p><input type="checkbox"/> 66. Commitment to protect forest areas from illegal activities?</p>	<p>✓</p>	<p>1 / 1 Source</p>
<p><input type="checkbox"/> 67. Commitment to protect forest areas from illegal activities applies to all suppliers?</p>	<p>✘</p>	<p>0 / 1</p>
<p><input type="checkbox"/> 68. Evidence of protecting forest areas from illegal activities? The company uses the Mosaic Landscape Approach to preserve and protect native vegetation from illegal hunting and logging, uses electronic surveillance, tactical ground patrol groups, awareness campaigns through the Friends of the Forest Program, and participates in the Community Committee for Forest Security, where security solutions with community representatives and local authorities are thoroughly explored. Points for external verification have been awarded on the basis of the company's PEFC-certified landbank.</p>	<p>✓ +</p>	<p>1 / 1 Source 0.64 / 1</p>
<p><input type="checkbox"/> 69. Commitment to no use of genetically modified organisms? The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore</p>	<p>✓</p>	<p>1 / 1 Source</p>

been awarded on the basis of the company's FSC-certification/FSC membership.

✓ 1 / 1 [Source](#)

■ **70. Commitment to no use of genetically modified organisms applies to all suppliers?**

The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.



> **HCV, HCS and impact assessments**

475 / 10 47.5%

✓ 1 / 1 [Source](#)

■ **71. Commitment to conduct High Conservation Value (HCV) assessments?**

✓ 1 / 1 [Source](#)

■ **72. Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers?**

The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.

P 0.5 / 1 [Source](#)

■ **73. High Conservation Value (HCV) assessments available?**

The company summarises HCV assessments in its FMPs, partial points have been awarded as full assessments aren't available or externally verified.

P 0.75 / 1 [Source](#)

■ **74. High Conservation Value (HCV) management and monitoring plans available?**

The company summarises HCV assessments and management plans in its FMPs, partial points have been awarded as plans are not externally verified.

✗ 0 / 1

■ **75. Commitment to the High Carbon Stock (HCS) Approach?**

✗ 0 / 1

■ **76. Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers?**

✗ 0 / 1

■ **77. High Carbon Stock (HCS) assessments available?**

✓ 1 / 1 [Source](#)

■ **78. Commitment to conduct social and environmental impact assessments (SEIAs)?**

✗ 0 / 1

■ **79. Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers?**

P 0.5 / 1 [Source](#)

■ **80. Social and environmental impact assessments (SEIAs) available, and associated management and monitoring plans?**

The company includes social impact monitoring in one of its FMPs as well as environmental monitoring in the form of HCV monitoring.

■ **81. Company has provided valid legal documents to Open Timber Portal on impact assessments (at the time of SPOTT assessments)?**

This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.





> Soils, fire and GHG emissions

8 14 / 19 42.8%

⚠️ 1 media report

<p>■ 82. Commitment to no planting on peat of any depth?</p>	✗	0 / 1
<p>■ 83. Commitment to no planting on peat of any depth applies to all suppliers?</p>	✗	0 / 1
<p>■ 84. Landbank or planted area on peat (ha)?</p>	✗	0 / 1
<p>■ 85. Implementation of commitment to no planting on peat of any depth?</p>	✗	0 / 1
<p>■ 86. Commitment to best management practices for soils and peat? The company only states commitment to best management practices for soils.</p>	P	0.5 / 1 Source
<p>■ 87. Commitment to best management practices for soils and peat applies to all suppliers?</p>	✗	0 / 1
<p>■ 88. Evidence of best management practices for soils and peat? The company has only provided evidence of best management practices for soils and it is unclear if the company has any landbank on peat.</p>	P	0.5 / 2 Source
<p>■ 89. Commitment to reduced impact logging? This indicator is disabled as the company reports that it only produces wood/wood fibre from plantation forests.</p>		
<p>■ 90. Commitment to reduced impact logging applies to all suppliers? This indicator is disabled as the company reports that it only sources wood/wood fibre from plantation forests.</p>		
<p>■ 91. Evidence of implementing reduced impact logging practices? This indicator is disabled as the company reports that it only produces wood/wood fibre from plantation forests.</p>		
<p>■ 92. Commitment to zero burning?</p>	✓	1 / 1 Source
<p>■ 93. Commitment to zero burning applies to all suppliers?</p>	✓	1 / 1 Source
<p>■ 94. Evidence of fire monitoring and management? The company uses a multi-pronged approach for monitoring fires which includes electronic surveillance, tactical ground patrol groups, awareness campaigns through the Friends of the Forest Program, regular training and upskilling of firefighting teams, and the company's participation in the Community Committee for Forest Security, where security solutions with community representatives and local authorities are thoroughly explored.</p>	✓ +	1 / 1 Source 0.64 / 1

<p>✓ 1 / 1 Source</p> <p>■ 95. Details/number of hotspots/fires in company FMUs? 130 - in 2019, 49 fires were recorded for Bracell Sao Paulo operations and 81 for Bracell Bahia operations.</p>
<p>✗ 0 / 1</p> <p>■ 96. Details/number of hotspots/fires in suppliers operations?</p>
<p>P 0.5 / 1 Source</p> <p>■ 97. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity? The company only states its commitment to reduce GHGs in all its operations.</p>
<p>P 0.5 / 1 Source</p> <p>■ 98. GHG emissions intensity? The company reports a carbon footprint of 0.842 kg CO₂ e per kilogram of dissolving pulp for Bahia operations and absorption of 4.9 million tCO₂ per year of carbon sequestration for Bahia and São Paulo operations together.</p>
<p>✗ 0 / 1</p> <p>■ 99. GHG emissions from land use change?</p>
<p>P 0.5 / 1 Source</p> <p>■ 100. Progress towards commitment to reduce GHG emissions intensity? The company reports an increase in the carbon footprint of 1.9% from 2017 to 2018 in Bahia. For São Paulo operations, no calculation is made by the company.</p>
<p>✓ 1 / 1 Source</p> <p>■ 101. Methodology used to calculate GHG emissions? GHG Protocol methodology.</p>



> Water, chemical and waste management

10.25 / 22 46.6%

<p>✓ 1 / 1 Source</p> <p>■ 102. Time-bound commitment to improve water use intensity? The company has a yearly target for water consumption for its mill operation of 30 m³/ton at Bahia and 23 m³/ton at São Paulo.</p>
<p>✓ 1 / 1 Source</p> <p>■ 103. Water use intensity? The company reports its water use intensity figure of 31.2 m³ per ton of air-dried pulp produced at Bahia and 23.5 m³ per ton of bleached eucalyptus kraft pulp produced at São Paulo.</p>
<p>P 0.75 / 1 Source</p> <p>■ 104. Progress towards commitment on water use intensity? The company reports a reduction in its water use intensity from 33 m³/ton in 2016 to 31.2 m³ per ton in 2018.</p>
<p>✓ 1 / 1 Source</p> <p>■ 105. Time-bound commitment to improve water quality (BOD and COD)? The company has disclosed a target to keep its organic effluent below 25.5 m³/admt per month for Bahia and <20 m³/admt for São Paulo for 2019.</p>
<p>P 0.75 / 1 Source</p> <p>■ 106. Progress towards commitment on water quality (BOD and COD)? The company reports a reduction in the organic effluent generated from 25.8 m³/admt in 2017 to 25.4 m³/admt in 2018 and from 19.7 m³/admt in 2017 to 19.8 m³/admt in 2018 in Bahia and São Paulo respectively. BOD level has increased since 2017.</p>
<p>■ 107. Treatment of pulp and paper mill effluent?</p>

	P	0.75 / 1	Source
The company has provided detailed information and figures on wastewater effluent treatment.			
■ 108. Evidence of sawmill run-off containment and wastewater treatment?			
This indicator is disabled as the company reports that it doesn't own sawmills.			
	✗	0 / 1	
■ 109. Proportion of processing facilities with closed-loop water treatment system?			
	✓	1 / 1	Source
■ 110. Commitment to protect natural waterways through buffer zones?			
	P	0.5 / 1	Source
■ 111. Implementation of commitment to protect natural waterways through buffer zones?			
The company only provides limited details about its social investment activity in Bahia to restore riparian forests and degraded springs.			
	P	0.5 / 1	Source
■ 112. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?			
The company commits to reduce both pesticide and fertiliser use in its Sao Paulo operations, however it only commits to reduce pesticide use in its Bahia operations.			
	✗	0 / 1	
■ 113. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers?			
	✗	0 / 1	
■ 114. Evidence of eliminating chlorine and chlorine compounds for bleaching?			
	✓	1 / 1	Source
■ 115. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?			
	✗	0 / 1	
■ 116. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all suppliers?			
	✗	0 / 1	
■ 117. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?			
	✗	0 / 1	
■ 118. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers?			
	P	0.5 / 1	Source
■ 119. Chemical usage per ha or list of chemicals used?			
Chemical usage for Bahia operations are included in a PEFC audit. However, these do not cover the full scope of operations.			
	✗	0 / 2	Source
■ 120. Implementation of commitment to reduce chemical usage?			
	P	0.75 / 2	Source
■ 121. Integrated Pest Management (IPM) approach?			
The company clearly mentions that it integrates IPM to increase forestry productivity and provides details on its implementation. Partial points awarded as the information is not externally verified.			

■ 122. Waste management system in place to avoid negative impacts?

The company states its commitment to effective waste management, eco-efficiency and favours the reuse and recycling of materials whenever possible.



> Community, land and labour rights

22 / 34 65.4%

✓ 1 / 1 [Source](#)

■ 123. Commitment to human rights?

The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.

✓ 1 / 1 [Source](#)

■ 124. Commitment to human rights applies to all suppliers?

The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.

P 0.75 / 1 [Source](#)

■ 125. Progress on human rights commitment ?

The company provides human rights training to its new employees and has an internal audit team which addresses the complaints pertaining to the violation of its code of conduct including protection of human rights.

✓ 1 / 1 [Source](#)

■ 126. Commitment to respect Indigenous and local communities' rights?

The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.

✓ 1 / 1 [Source](#)

■ 127. Commitment to Indigenous and local communities' rights applies to all suppliers?

The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.

✓ 1 / 1 [Source](#)

■ 128. Commitment to respect legal and customary land tenure rights?

P 0.5 / 1 [Source](#)

■ 129. Commitment to legal and customary land rights applies to all suppliers?

The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). As the Policy for Association's requirements do not fully meet the SPOTT indicator criteria partial points have been awarded on the basis of the company's FSC-certification/FSC membership.

✗ 0 / 1 [Source](#)

■ 130. Commitment to free, prior and informed consent (FPIC)?

The company's parent Royal Golden Eagle's Sustainability Framework commits to FPIC but this policy only guides the company's sustainability policy which does not refer to FPIC.

✗ 0 / 1

■ 131. Commitment to free, prior and informed consent (FPIC) applies to all suppliers?

✗ 0 / 1

■ 132. Details of free, prior and informed consent (FPIC) process available?

P 0.75 / 1 [Source](#)

■ 133. Examples of local stakeholder engagement to prevent conflicts?

The company uses devices such as social mapping and meetings with communities to prevent stakeholder conflict. However, efforts have not been externally verified so full points cannot be awarded.

	✘	0 / 1	Source
<p>134. Details of process for addressing land conflicts available?</p> <p>The company only has a general statement about conflict resolution through negotiation and consensus.</p>			
	P	0.75 / 1	Source
<p>135. Supports the inclusion of women across forestry operations, including addressing barriers faced?</p> <p>The company has reported many examples of its initiatives to support the inclusion of women across the forestry operations.</p>			
<p>136. Company has provided valid legal documents to Open Timber Portal on population rights (at the time of SPOTT assessments)?</p> <p>This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>			
<p>137. Commitment to enable sustainable use of non-timber forest products (NTFPs) by local communities?</p> <p>This indicator is disabled as the company reports that it only produces wood/wood fibre from plantation forests.</p>			
	✓	1 / 1	Source
<p>138. Commitment to provide essential community services and facilities ?</p>			
	P	0.75 / 2	Source
<p>139. Progress on commitment to provide essential community services and facilities?</p> <p>The company has reported several examples of providing essential community services and facilities.</p>			
	✓	1 / 1	Source
<p>140. Commitment to provide business/work opportunities for local communities?</p>			
<p>141. Company has provided valid legal documents to Open Timber Portal on labour regulations (at the time of SPOTT assessments)?</p> <p>This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>			
	✓	1 / 1	Source
<p>142. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles?</p> <p>The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.</p>			
	✓	1 / 1	Source
<p>143. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles applies to all suppliers?</p> <p>The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.</p>			
	P	0.75 / 1	Source
<p>144. Progress on commitment to respect all workers' rights?</p> <p>The company provides training to new employees on the code of conduct and has an internal audit team to address the matters in case any violations to the code are identified.</p>			
	✓	1 / 1	Source
<p>145. Commitment to eliminate gender related discrimination with regards to employment?</p>			
	✓	1 / 1	Source
<p>146. Commitment to eliminate gender related discrimination with regards to employment applies to all suppliers?</p>			

	✘	0 / 1
■ 147. Progress on commitment to eliminate gender related discrimination with regards to employment?		
	✓	1 / 1 Source
■ 148. Percentage or number of temporary employees?		
	✓	1 / 1 Source
■ 149. Percentage or number of women employees? The company reports 23% of women each in the forestry and industrial operations of Bahia region and 16% and 14% of women in the forestry and industrial operations of São Paulo region respectively.		
	✓	1 / 1 Source
■ 150. Commitment to pay at least minimum wage?		
	✘	0 / 1
■ 151. Commitment to pay at least minimum wage applies to all suppliers?		
	P	0.75 / 1 Source
■ 152. Progress on commitment to pay at least minimum wage? The company has reported figures which show that it pays more than the minimum wage to its employees.		
	✘	0 / 1
■ 153. Reporting of salary by gender?		
	P	0.5 / 1 Source
■ 154. Commitment to address occupational health and safety? The company does not refer to the ILO Code of Practice on Safety and Health in Forestry Work.		
	✘	0 / 1
■ 155. Commitment to address occupational health and safety applies to all suppliers?		
	P	0.75 / 1 Source
■ 156. Provision of personal protective equipment and related training? The company provides personal protective equipment (PPE) and conducts training to raise the safety awareness of its employees.		
	✓	1 / 1 Source
■ 157. Time lost due to work-based injuries? The company has reported several safety figures for its own and outsourced employees for both Bahia and São Paulo regions. Frequency rate = number of accidents x 1,000,000/ total man-hours worked.		
	✓	1 / 1 Source
■ 158. Number of fatalities as a result of work-based accidents?		



> Smallholders and suppliers

3.75 / 8 46.9%

⚠ 1 media report

P 0.5 / 1 [Source](#)

■ **159. Commitment to support smallholders?**
The company has a forest producer program as a part of its community development initiative to help local people develop forestry businesses by sharing its forest technology and buying a part of their woods produced. Partial points have been awarded as limited detail on the programme is provided.

<p>160. Programme to support outgrower scheme and/or independent smallholders? The company has launched a forest producer program as a part of its community development initiative to help local people develop forestry businesses by sharing its forest technology and buying a part of their woods produced.</p>	<p>P 0.75 / 1 Source</p>
<p>161. Percentage of outgrower scheme and/or independent smallholders involved in programme? [Externally verified] 152 - The company has respectively 44 and 108 farmers engaged in its smallholder programs in Sao Paulo and Bahia (Tree Farming Program).</p>	<p>P 0.75 / 1 Source</p>
<p>162. Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements? The company states it has a formal verification procedure but limited detail is given on the process.</p>	<p>P 0.5 / 1 Source</p>
<p>163. Number or percentage of suppliers assessed and/or engaged on compliance with company's policy and/or legal requirements? 100% - The company states that it assesses its suppliers on their compliance with its requirements related to human rights, legality, labor practices and social commitments. It is suggested that 100% of the suppliers are assessed.</p>	<p>P 0.75 / 1 Source</p>
<p>164. Suspension or exclusion criteria for suppliers? The company's contracts require all suppliers to commit to respecting human rights, prohibit any form of discrimination, child labor, forced or slave-like labor and violations of freedom of labor unions, and support the right to collective bargaining. Supplier's contracts are revoked in case they do not abide by these requirements, however, the timeframe for action isn't stated.</p>	<p>P 0.5 / 1 Source</p>
<p>165. Timebound action plans (including Key Performance Indicators) for suppliers to be in compliance with timber and pulp sourcing commitments?</p>	<p>X 0 / 1</p>
<p>166. Proportion of direct and indirect supply that comes from FMUs which are compliant with timber and pulp sourcing policies?</p>	<p>X 0 / 1</p>



> Governance and grievances

4.75 / 7 67.9%

<p>167. Commitment to ethical conduct and prohibition of corruption?</p>	<p>✓ 1 / 1 Source</p>
<p>168. Commitment to ethical conduct and prohibition of corruption applies to all suppliers?</p>	<p>✓ 1 / 1 Source</p>
<p>169. Progress on commitment to ethical conduct and prohibition of corruption? The company provides training to its employees on anti-corruption procedures, has set up an internal audit team to address the matters concerning the violation of its code of conduct including cases of corruption.</p>	<p>P 0.75 / 1 Source</p>
<p>170. Company has provided valid legal documents to Open Timber Portal on legal registration (at the time of SPOTT assessments)? This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.</p>	

✘ 0 / 1

■ 171. Disclosure of the company's management approach to tax and payments to governments?

■ 172. Company has provided valid legal documents to Open Timber Portal on taxes, fees and royalties (at the time of SPOTT assessments)?

This indicator is disabled as the company reports that it doesn't operate in a geography currently covered by Open Timber Portal.

■ 173. Whistleblowing procedure? ✓ 1 / 1 [Source](#)

■ 174. Own grievance or complaints system open to all stakeholders? ✓ 1 / 1 [Source](#)

■ 175. Details of complaints and grievances disclosed? ✘ 0 / 1 [Source](#)