

Eldorado Brasil Celulose SA

Timber and pulp assessment

Total score:


51.3%

Latest update: July 2019

Next scheduled: July 2020

About this company:	Founded in 2005, Eldorado Brasil Celulose SA is engaged in pulpwood production, trading and distribution with operations in Brazil. It also supplies energy generated from biomass. J&F Investimentos S.A. and CA Investment (Brazil) S.A. are the company's parent entities.
Parent company:	J&F Investimentos S.A. (50.59%), CA Investment (Brazil) S.A. (49.40%)
Landbank	229,592 hectares
Thomson Reuters ticker:	Private company
Bloomberg ticker:	Private company
Activities:	Pulpwood production, trading and distribution
Locations:	Brazil (Mato Grosso do Sul, Mato Grosso, Sao Paulo)
Headquarters:	Brazil
Related companies:	Eldorado has been bought by Paper Excellence in 2017, a subsidiary of Sinar Mas who is also the parent of Asia Pulp and Paper (APP).
Parent website:	http://jfinvest.com.br/
Website:	http://www.eldoradobrasil.com.br/ Latest annual report (2018) Sustainability report (2017)

Total:	58 / 113	51.3%
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	> Sustainability policy and leadership		
	6.5 / 9	72.2%	
1. Sustainable forestry policy or commitment for all its operations?		✓	1 / 1 Source
2. Sustainability policy or commitment applies to all sourcing?		P	0.5 / 1 Source
The company has a code of conduct which applies to all its suppliers and includes social and governance policies in line with its sustainability policy. However, the policy does not cover environmental issues. Half a point has been awarded			
3. High-level position of responsibility for sustainability?		✓	1 / 1 Source
The company has a Director in charge of Human Resources, Sustainability and Communication			
4. One or more board members have responsibility for sustainability?	This indicator is disabled as the company is not publicly listed		
5. Percentage or number of women board members?	This indicator is disabled as the company is not publicly listed		
6. Percentage or number of women in senior management team?		✓	1 / 1 Source
0 (0%)			
7. Sustainability report published within last two years?			

2,017	✓	1 / 1	Source
8. Member of multiple industry schemes or other external initiatives to improve forest management or transparency? FSC	P	0.5 / 1	Source
9. Activities with government, NGOs or academic institutions to improve the sustainability of forest products? Participation in various stakeholder groups (e.g. local WWF Forums; IPEF, Forestry Studies and Research Institute)	✓	1 / 1	Source
10. Climate risks assessment available? The company reports conducting research to predict potential impacts from climate change, however, no assessment/data has been published	P	0.5 / 1	Source
11. Natural capital assessment available? The company monitors water withdrawal at all withdrawal sites on its properties in accordance with water stewardship standards, however, it does not follow Natural Capital Protocol	✗	0 / 1	Source



> Landbank, mills and traceability

9 / 18 50%

⚠ 2 media reports

12. Lists countries and operations? Brazil (plantations, mill)	✓	1 / 1	Source
13. Total area of natural forest designated for wood/wood fibre production (ha)? This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from plantation forests			
14. Total area of forest plantation (ha)? 229,592 - The company reports having a production area of 229,592 ha out of a total landbank of 359,260 ha (figures published in 2018)	✓	1 / 1	Source
15. Area of plantation/natural forest within outgrower schemes (ha)? This indicator is disabled as the company has informed ZSL that it doesn't use outgrower schemes for wood/wood fibre production			
16. Unplanted (areas designated for future development as plantation forest) (ha)?	✗	0 / 1	Source
17. Conservation set-aside and/or HCV area (ha)? 106,520 - The company's FSC surveillance report (last updated in April 2019) suggests that it has at least 106,519.72 ha conservation area. However this report does not cover all of the company's operations	P	0.5 / 1	Source
18. 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>19. Number of Forest Management Units (FMUs)? 13</p>	✓	1 / 1 Source
<p>20. Maps of forest management units (FMUs)? 0.5 - The company only provides names of farms and a static map</p>	P	0.5 / 1 Source
<p>21. Forest management plans available for all FMUs?</p>	✓	1 / 1 Source
<p>22. Monitoring of forest management plan implementation?</p>	✓	1 / 1 Source
<p>23. Company has provided valid legal documents to Open Timber Portal on use rights (at the time of SPOTT assessments)? This indicator is disabled as the company's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this</p>		
<p>24. 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's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this</p>		
<p>25. 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's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this</p>		
<p>26. Number of company owned pulp and paper mills? 1 - The company is currently working on expanding the current mill (Vanguardia 2.0 project), but this is not yet operational</p>	✓	1 / 1 Source
<p>27. Maps or addresses of company owned pulp and paper mills?</p>	✓	1 / 1 Source
<p>28. Number of company owned sawmills? This indicator is disabled as the company has informed ZSL that it doesn't own sawmills</p>		
<p>29. Maps or addresses of company owned sawmills? This indicator is disabled as the company has informed ZSL that it doesn't own sawmills</p>		
<p>30. Number of supplier mills?</p>	✗	0 / 1
<p>31. Maps or addresses of supplier mills?</p>	✗	0 / 1
<p>32. Procedures to trace raw materials to country of harvest? The company has a FSC CoC certificate which counts as the procedure for the certified portion of all raw materials the</p>	P	0.5 / 1 Source

company sources		
33. Procedures to trace raw materials to FMU level? The company has a FSC CoC certificate which counts as the procedure for the certified portion of all raw materials the company sources	P	0.5 / 1 Source
34. Percentage of supply traceable to country level (above 80%)? The company has CoC certificates covering its wood supply coming from the states of Mato Grosso do Sul and Goiás. However, it is unclear what percentage of all the company's supply that represents	X	0 / 2 Source
35. Percentage of supply traceable to FMU level (above 75%)? The company has CoC certificates covering their wood supply coming from the states of Mato Grosso do Sul and Goiás. However, it is unclear what percentage of all the company's supply that represents	X	0 / 2 Source



> Deforestation and biodiversity

7 / 10 70%		
1 media report		
36. Commitment to zero conversion of natural forest?	X	0 / 1
37. Zero conversion commitment applies to all sourcing?	X	0 / 1
38. Commitment to minimise the impact of logging roads? This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from plantation forests		
39. Commitment to protect forest areas from illegal activities?	✓	1 / 1 Source
40. Evidence of monitoring deforestation? The company states that drones are monitoring an average 500 hectares daily to identify environmental damage and erosion and the data is fed into a system that builds a 3D model of the company's land (incl. conservation areas)	✓	1 / 1 Source
41. Amount of deforestation recorded?	X	0 / 1
42. Commitment to biodiversity conservation?	✓	1 / 1 Source
43. Examples of species and/or habitat conservation management?	✓	1 / 1 Source
44. Implementing a landscape-level approach to biodiversity conservation?	✓	1 / 1 Source
45. Identified species of conservation concern referencing international or national system of species classification?	✓	1 / 1 Source

46. Commitment to sustainably manage the use of non-timber forest products (NTFPs)?

This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from plantation forests

✓ 1 / 1 [Source](#)

47. Commitment not to use genetically modified organisms?

The company has committed to not be directly or indirectly involved in the introduction of genetically modified organisms in forestry operations. This commitment is made through the FSC Policy for Association (FSC-POL-01-004)



> **HCV, HCS and impact assessments**

35 / 8 43.8%

48. Commitment to conduct High Conservation Value (HCV) assessments?

✓ 1 / 1 [Source](#)

49. HCV commitment applies to all sourcing?

The company has a commitment to only source wood/wood fibre that meets FSC Controlled Wood requirements which includes not sourcing wood from forests with a high conservation value

✓ 1 / 1 [Source](#)

50. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network's Assessor Licensing Scheme (ALS)?

This indicator is disabled until sufficient number of HCV ALS licensed assessors are available for the location where the company operates

51. High Conservation Value (HCV) assessments available?

✗ 0 / 1

52. High Conservation Value (HCV) management and monitoring plans available?

✗ 0 / 1

53. Commitment to the High Carbon Stock (HCS) Approach?

✗ 0 / 1

54. High Carbon Stock (HCS) assessments available?

✗ 0 / 1

55. Commitment to conduct social and environmental impact assessments (SEIAs)?

✓ 1 / 1 [Source](#)

56. Social and environmental impact assessments (SEIAs) available?

The company has provided some information on its Environmental Impacts EIA, however no information on Social Impacts is available

P 0.5 / 1 [Source](#)

57. 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's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this



> **Soils, fire and GHGs**

35 / 10 35%

	✘	0 / 1
58. Commitment to best management practices for soils and/or peat?		
59. Commitment to reduced impact logging? This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from plantation forests		
60. Commitment to no planting on peat of any depth? This indicator is disabled as the company has informed ZSL that it doesn't have landbank on peat		
61. Commitment on peatland planting applies to all sourcing? This indicator is disabled as the company has informed ZSL that it does not have suppliers with landbank on peat		
62. Landbank or planted area on peat (ha)? This indicator is disabled as the company has informed ZSL that it doesn't have landbank on peat		
	✓	1 / 1 Source
63. Evidence of best management practices for soils and/or peat?		
	✘	0 / 1
64. Commitment to zero burning?		
	✘	0 / 1
65. Commitment to zero burning applies to all sourcing?		
	✓	1 / 1 Source
66. Evidence of management and monitoring fires?		
	✘	0 / 1
67. Details/number of hotspots/fires in FMUs controlled by the company?		
	✘	0 / 1 Source
68. Time-bound commitment to reduce GHG emissions intensity?		
	P	0.5 / 1 Source
69. Progress towards reducing GHG emission intensity? 0.16 - Company reports progress towards reducing GHG intensity but no target in place		
	✘	0 / 1
70. Report GHG emissions from land use change?		
	✓	1 / 1 Source
71. Methodology used to calculate GHG emissions? Brazilian GHG Protocol		



> Water, chemical and waste management

35 / 17 20 2%

⚠ 1 media report

	✘	0 / 1 Source
72. Time-bound commitment to improve water quality (BOD and COD)?		

73. Progress towards commitment on water quality (BOD and COD)? The company has no commitment in place but reports that it reduced BOD by 97.4% in 2017	P	0.5 / 1	Source
74. Commitment to protection of natural waterways through buffer zones?	✓	1 / 1	Source
75. Evidence of treatment of pulp and paper mill effluent?	✓	1 / 1	Source
76. Evidence of sawmill run-off containment and wastewater treatment? This indicator is disabled as the company has informed ZSL that it doesn't own sawmills			
77. Time-bound commitment to improve water use intensity?	✗	0 / 1	
78. Progress towards commitment on water use intensity? 25,711.6 - The company reports reduction in the amount of water consumption intensity (m ³ /ADT) in 2017 compared to 2016 and 2015. However there is no time-bound commitment in place to reduce water use	P	0.5 / 1	Source
79. Commitment to eliminate chlorine and chlorine compounds for bleaching?	✗	0 / 1	
80. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?	✗	0 / 1	
81. No use of World Health Organisation (WHO) Class 1A and 1B pesticides?	✗	0 / 1	
82. No use of chemicals listed under the Stockholm Convention and Rotterdam Convention?	✗	0 / 1	
83. Integrated Pest Management (IPM) approach?	✗	0 / 1	Source
84. Chemical usage per ha or list of chemicals used? Figures for pesticides and herbicides used can be found in 2017 FSC Audit Report, however this report does not cover all of the company's operations (i.e. some FMUs are excluded from certification)	P	0.5 / 1	Source



> Community, land and labour rights

15 / 22 68.2%

85. Commitment to human rights, referencing the UN Declaration on Human Rights or UN Guiding Principles on Business and Human Rights? The company has committed to not be directly or indirectly involved in the violation of human rights in forestry operations. This commitment is made through the FSC Policy for Association (FSC-POL-01-004), which defines human rights as those established through the UN Declaration of Human Rights	✓	1 / 1	Source
86. Commitment to human rights applies to all sourcing? The company has committed to not be directly or indirectly involved in the violation of human rights in forestry operations.	✓	1 / 1	Source

This commitment is made through the FSC Policy for Association (FSC-POL-01-004), which defines human rights as those established through the UN Declaration of Human Rights

✓ 1 / 1 [Source](#)

87. Commitment to respect indigenous and local communities' rights?

The company has committed to not be directly or indirectly involved in the violation of human rights in forestry operations. This commitment is made through the FSC Policy for Association (FSC-POL-01-004), which encompasses the rights of Indigenous and Tribal Peoples as established by the ILO Convention 169

P 0.5 / 1 [Source](#)

88. Commitment to respect legal and customary property rights?

The company has committed to not be directly or indirectly involved in the violation of traditional rights in forestry operations. This commitment is made through the FSC Policy for Association (FSC-POL-01-004), which encompasses customary rights. This policy does not reference legal rights and no reference to legal rights could be found in company sources

✗ 0 / 1

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

✗ 0 / 1

90. FPIC commitment applies to independent suppliers?

✗ 0 / 1

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

✓ 1 / 1

92. Examples of local stakeholder engagement to prevent conflicts?

✗ 0 / 1

93. Details of process for addressing land conflicts available?

✗ 0 / 1

94. Commitment to support the inclusion of women across forestry operations, including addressing barriers faced?

✓ 1 / 1 [Source](#)

95. Commitment to provide essential community services and facilities?

96. Company has provided valid legal documents to Open Timber Portal on population rights (at the time of SPOTT assessments)?

This indicator is disabled as the company's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this

✓ 1 / 1 [Source](#)

97. Commitment to respect all workers' rights?

✓ 1 / 1 [Source](#)

98. Reference to Fundamental ILO Conventions?

The company has committed to not be directly or indirectly involved in the violation of any of the ILO Core Conventions. This commitment is made through the FSC Policy for Association (FSC-POL-01-004)

✓ 1 / 1 [Source](#)

99. Commitment to eliminate gender related discrimination with regards to employment and occupation?

100. Company has provided valid legal documents to Open Timber Portal on labour regulations (at the time of SPOTT assessments)?

This indicator is disabled as the company's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this

	✓	1 / 1	Source
101. Percentage or number of temporary employees? 0 (0%) - The company reports having no temporary employees as of 2017			
102. Percentage or number of women employees? 582 (15.3%)	✓	1 / 1	Source
103. Payment of minimum wage?	✓	1 / 1	Source
104. Reporting of salary by gender?	✗	0 / 1	
105. Commitment to address occupational health and safety, referencing the ILO Code of Practice on Safety and Health in Forestry Work? The company commits to address occupational health and safety but no reference to the ILO Code of Practice on Safety and Health in Forestry Work given	P	0.5 / 1	Source
106. Time lost due to work-based injuries? 620 - Figure relates to number of days lost due to occupational injuries	✓	1 / 1	Source
107. Number of fatalities as a result of work-based accidents? 0	✓	1 / 1	Source
108. Provision of personal protective equipment and related training?	✓	1 / 1	Source



> Certification standards

		1 / 11	28.6%
109. Time-bound plan for achieving 100% third-party legality verification of FMUs or achieved?	✗	0 / 1	
110. Time-bound plan to source only wood/wood fibre that is in legal compliance verified by a third party?	✗	0 / 1	
111. Percentage area (ha) verified as being in legal compliance by a third party? 350,826 (97.65%) - The company reports it operates on 359,260.46 ha land (incl. conservation areas) and has 350,826.49 ha of Forest Area that is FSC-FM/CoC certified. This represents 97.65% of the total forest area controlled by the company (figures published in 2017 and 2018)	✓	1 / 1	Source
112. Percentage of all wood/wood fibre supply traded/processed verified as being in legal compliance by a third party?	✗	0 / 1	
113. Time-bound plan for achieving 100% FSC FM certification of FMUs or achieved 100% FSC-certification of FMUs?	✗	0 / 1	

	✓	1 / 1	Source
114. Commitment to source only wood/wood fibre that meets FSC Controlled Wood requirements?			
	✓	2 / 2	Source
115. Percentage area (ha) FSC FM certified? 350,826 (97.65%) - The company reports it operates on 359,260.46 ha land (incl. conservation areas) and has 350,826.49 ha of Forest Area that is FSC-FM/CoC certified. The represents 97.65% of the total forest area controlled by the company (figures published in 2017 and 2018)			
	✗	0 / 2	
116. Percentage of wood/wood fibre supply from outgrower scheme and/or independent suppliers that is FSC FM certified?			
	✗	0 / 2	
117. Percentage of all wood/wood fibre supply traded/processed that are FSC certified (above 75%)?			
	✗	0 / 2	Source
118. Percentage area (ha) PEFC certified (excluding FSC certified area)? The company states that the majority of its area is certified by Cerflor. However, it is not possible to accurately calculate the percentage area PEFC certified, that is not FSC certified			



> Smallholders and suppliers

3 / 4 75%

	✓	1 / 1	Source
119. Programme to support outgrower scheme smallholders? This indicator is disabled as the company has informed ZSL that it doesn't use outgrower schemes for wood/wood fibre production			
120. Percentage of outgrower scheme smallholders involved in programme? This indicator is disabled as the company has informed ZSL that it doesn't use outgrower schemes for wood/wood fibre production			
	✓	1 / 1	Source
121. Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements?			
	✗	0 / 1	Source
122. The company has a Due Diligence System (DDS)?			
	✓	1 / 1	Source
123. Suspension or exclusion criteria for suppliers?			
	✓	1 / 1	Source
124. Percentage of suppliers assessed and/or engaged on compliance with company requirements? 172 - Figure represents new suppliers in 2016 that were assessed by the company. Additionally, the company states that 3,000 suppliers were assessed in 2015			



> Governance and grievances

3 / 6 50%

⚠ 6 media reports			
125. Commitment to ethical conduct and prohibition of corruption?			

126. 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's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this

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

128. 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's reporting broadly suggests that it doesn't operate in a geography currently covered by Open Timber Portal. Please note that ZSL has been unable to confirm this

129. Whistleblowing procedure?

The company has an external Ombudsman channel which allows for anonymity. However, no clear description of the steps taken could be identified

130. Own grievance or complaints system open to all stakeholders?

131. Details of grievances disclosed?

The company provides a summary of the grievances in 2017 and states their status