

Toba Pulp Lestari

Total score:

60.4%

Latest update: July 2020

Next scheduled: July 2021

About this company:	Established in 1983, Toba Pulp Lestari is an Indonesian pulp and paper producer. Toba Pulp Lestari is a subsidiary of Pinnacle Company.
Parent company:	Pinnacle Company Limited
Landbank	239,850 hectares
Market cap:	79,611,403 USD
Thomson Reuters ticker:	INRU,JK
Bloomberg ticker:	INRU:IJ
ISIN:	ID1000094303
Activities:	Pulpwood production; Pulp and paper production
Locations:	North Sumatra
Headquarters:	Indonesia
Related companies:	PT Toba Pulp Lestari's mill is owned by Sukanto Tanoto, who controls the RGE group and is the CEO of APRIL
Website:	https://www.tobapulp.com/ Latest annual report (2018) Sustainability report (2018)

Total:	101.44 / 168	60.4%
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> Sustainability policy and leadership

7.5 / 12 62.5%

3 media reports



<input checked="" type="checkbox"/> 1. Sustainable forestry policy or commitment for all its operations?	✓	1 / 1	Source
<input checked="" type="checkbox"/> 2. Sustainable forestry policy or commitment applies to all suppliers?	✓	1 / 1	Source
<input checked="" type="checkbox"/> 3. High-level position of responsibility for sustainability? The company has a sustainability department that reports to a managing director.	✓	1 / 1	Source
<input checked="" type="checkbox"/> 4. One or more members within the board of the company have responsibility for sustainability? A member from the Board of Commissioners and a member from the Board of Directors sit on the sustainability board for the company.	✓	1 / 1	Source
<input type="checkbox"/> 5. Percentage or number of women in senior management team?	✗	0 / 1	

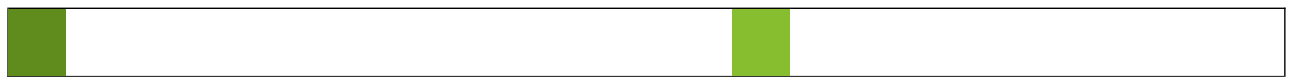
	P	0.5 / 1	Source
6. Percentage or number of women board members? 1 - The company provides profiles and photos of its board of directors which includes four men and one woman in its annual report. However, the company website only shows profiles for the four male directors, because this contradictory information is undated, evidence from the annual report has been accepted for this indicator. Partial points have been awarded as the company published photos of board members but does not directly report on their gender.			
	X	0 / 1	
7. Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with timber and pulp production?			
	✓	1 / 1	Source
8. Collaboration with stakeholders to reduce negative environmental or social outcomes associated with timber and pulp production?			
	✓	1 / 1	Source
9. Sustainability report published within last two years?			
	P	0.5 / 1	Source
10. Reports through standardised reporting systems? The company reports it has published its sustainability report based on GRI Guidelines but no report has been published on the GRI database.			
	P	0.5 / 1	Source
11. Climate risks assessment available? The company provides a summary of the risk assessment of its impact on Environment and Climate Risk.			
	X	0 / 1	
12. Natural capital assessment available?			



> Landbank, maps and traceability

14.5 / 22 65.9%

14 media reports



	✓	1 / 1	Source
13. Lists countries and operations?			
14. Lists countries sourcing from? This indicator is disabled as the company reports that it does not trade wood/wood fibre.			
	✓	1 / 1	Source
15. Total area of natural forest designated for wood/wood fibre production (ha)? 188,055			
	✓	1 / 1	Source
16. Total area of forest plantation (ha)? 75,642			
	✓	1 / 1	Source
17. Area of plantation/natural forest within outgrower schemes (ha)?			
	✓	1 / 1	Source
18. Unplanted (areas designated for future development as plantation forest) (ha)?			

	✓	1 / 1	Source
<input type="checkbox"/> 19. Conservation set-aside area, including HCV area (ha)?	✓	1 / 1	Source
<input type="checkbox"/> 20. Area of Intact Forest Landscape (ha)?	✗	0 / 1	
<input type="checkbox"/> 21. Number of Forest Management Units (FMUs)?	✓	1 / 1	Source
<input type="checkbox"/> 22. Maps of forest management units (FMUs)?	✓	1 / 1	Source
<input type="checkbox"/> 23. Forest management plans available for all FMUs?	✗	0 / 1	
<input type="checkbox"/> 24. Monitoring of forest management plan implementation available?	✗	0 / 1	
<input type="checkbox"/> 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.			
<input type="checkbox"/> 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.			
<input type="checkbox"/> 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.			
<input type="checkbox"/> 28. Names and locations of all third-party supplying FMUs?	✓	1 / 1	Source
<input type="checkbox"/> 29. Number of company owned sawmills? This indicator is disabled as the company reports that it doesn't own sawmills.			
<input type="checkbox"/> 30. Names and locations of company owned sawmills? This indicator is disabled as the company reports that it doesn't own sawmills.			
<input type="checkbox"/> 31. Number of company-owned pulp and paper mills? 1 - The company reports in its Annual Report 2018 that the mill rejuvenation project will be carried out and completed by 2019.	✓	1 / 1	Source
<input type="checkbox"/> 32. Names and locations of company-owned pulp and paper mills? The company's mill is located in Pangombusan Village, Parmaksian Sub-district, Toba District, North Sumatera. However, full points cannot be awarded because the mill is not easily located on GoogleMaps, a street address would be required to	P	0.5 / 1	Source

obtain full points.

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.

✓ 1 / 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?

The company produced 139,335 tons of dissolving pulp and 30,571 tons of BHKP in 2018.

✗ 0 / 1

35. Number of third party supplying mills?

✗ 0 / 1

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

✓ 1 / 1 [Source](#)

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

P 0.5 / 1 [Source](#)

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

The company states that it has a process of traceability and it is also PEFC CoC certified but very limited details are provided.

✓ 1 / 1 [Source](#)

39. Percentage of supply traceable to country of harvest?

100 - 100% of the company's supply is sourced from Indonesia.

P 0.5 / 1 [Source](#)

40. Procedures to trace raw materials to FMU level?

Points for external verification have been awarded on the basis of the company's PEFC-CoC and SVLK certifications. As the P&C do not fully meet the SPOTT indicator criteria partial points have therefore been awarded for this indicator.

✗ 0 / 1

41. Percentage of supply traceable to FMU level?



> **Certification standards**

1 / 9 11.1%

1 media report



✓ 1 / 1 [Source](#)

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

The company has an SVLK certification which is a mandate in Indonesia and it has full legality verification.

✓ 1 / 1 [Source](#)

43. Percentage area (ha) verified as being in legal compliance by a third party?

100% - The company has an SVLK certification which is a mandate in Indonesia and it has full legality verification.

✗ 0 / 1

44. Time-bound plan to source only wood/wood fibre that is in legal compliance verified by a third party?

<p>45. Percentage of all wood/wood fibre supply traded/processed verified as being in legal compliance by a third party?</p>	<p>✗ 0 / 1</p>
<p>46. Percentage area (ha) FSC FM certified?</p>	<p>✗ 0 / 1</p>
<p>47. Time-bound plan for achieving 100% FSC FM certification of FMUs or achieved 100% FSC-certification of FMUs?</p>	<p>✗ 0 / 1</p>
<p>48. Percentage of wood/wood fibre supply (tonnes) from all suppliers that comes from FSC FM certified areas?</p>	<p>✗ 0 / 1</p>
<p>49. Commitment to source only wood/wood fibre that meets FSC Controlled Wood and/or PEFC Controversial Sources requirements?</p>	<p>✓ 1 / 1 Source</p>
<p>50. Percentage area (ha) PEFC certified (excluding FSC certified area)? 177,448 (73.05%) - The company is #58 on the list of companies IFCC certified.</p>	<p>✓ 1 / 1 Source</p>



> Deforestation and biodiversity

13.06 / 22 63.5%

⚠ 21 media reports



<p>51. Commitment to zero deforestation or zero conversion of natural ecosystems? The company has committed to no deforestation on peatland but has not extended this commitment to mineral soils.</p>	<p>P 0.5 / 1 Source</p>
<p>52. Commitment to zero deforestation or zero conversion of natural ecosystems applies to all suppliers?</p>	<p>✓ 1 / 1 Source</p>
<p>53. Criteria for defining deforestation?</p>	<p>✗ 0 / 1</p>
<p>54. Evidence of monitoring deforestation? The company provides the methodology for monitoring the illegal logging but the extent of area being monitored or time frame is unclear.</p>	<p>P 0.5 / 1 Source</p>
<p>55. Amount of illegal/non-compliant deforestation recorded? 12 - The company reported eight instances of wood theft and four instances of illegal logging in 2019.</p>	<p>✓ 1 / 1 Source</p>
<p>56. Amount of illegal//non-compliant deforestation recorded in supplier operations?</p>	<p>✗ 0 / 1</p>
<p>57. Commitment to restoration of non-compliant deforestation/conversion?</p>	<p>✗ 0 / 1</p>

	✘ 0 / 1
<p>■ 58. Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers?</p>	
<p>■ 59. Implementing a landscape or jurisdictional level approach? [Externally verified] The company recognises the importance of conservation of landscape within the ecosystem but does not provide details on its implementation. 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 0.75 / 1 Source
<p>■ 60. Commitment to biodiversity conservation?</p>	✓ 1 / 1 Source
<p>■ 61. Commitment to biodiversity conservation applies to all suppliers?</p>	✓ 1 / 1 Source
<p>■ 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.</p>	P 0.75 / 1 Source
<p>■ 63. Examples of species and/or habitat conservation management? Points for external verification have been awarded on the basis of the company's PEFC-certified landbank. Also, the company provides examples of species and habitat conservation management.</p>	✓ 1 / 1 Source + 0.73 / 1
<p>■ 64. Commitment to no hunting or only sustainable hunting of species? The company commits to no hunting of protected species only, therefore full points cannot be awarded.</p>	P 0.5 / 1 Source
<p>■ 65. Commitment to no hunting or only sustainable hunting of species applies to all suppliers? The company's policy includes suppliers but only commits to no hunting of protected species, therefore full points cannot be awarded.</p>	P 0.5 / 1 Source
<p>■ 66. Commitment to protect forest areas from illegal activities?</p>	✓ 1 / 1 Source
<p>■ 67. Commitment to protect forest areas from illegal activities applies to all suppliers? The company's commitment to protect forest areas from illegal activities does not fully extend to suppliers as the evidence states it only "encourages environmental responsibility amongst its stakeholder groups" rather than stating that it prohibits illegal activity from them.</p>	✘ 0 / 1 Source
<p>■ 68. Evidence of protecting forest areas from illegal activities? Points for external verification have been awarded on the basis of the company's PEFC-certified landbank.</p>	✓ 1 / 1 + 0.73 / 1
<p>■ 69. Commitment to no use of genetically modified organisms?</p>	✓ 1 / 1 Source
<p>■ 70. Commitment to no use of genetically modified organisms applies to all suppliers?</p>	✓ 1 / 1 Source



> HCV, HCS and impact assessments

6 / 9 66.7%

 2 media reports



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? ✓ 1 / 1 [Source](#)

73. High Conservation Value (HCV) assessments available? ✗ 0 / 1

74. High Conservation Value (HCV) management and monitoring plans available? ✗ 0 / 1

75. Commitment to the High Carbon Stock (HCS) Approach? ✓ 1 / 1 [Source](#)

76. Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers? ✓ 1 / 1 [Source](#)

77. High Carbon Stock (HCS) assessments available?
This indicator is disabled as the company reports that it hasn't expanded its plantation area since January 2015.

78. Commitment to conduct social and environmental impact assessments (SEIAs)? ✓ 1 / 1 [Source](#)

79. Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers? P 0.5 / 1 [Source](#)
The company makes this commitment through SVLK certification requirements. As SVLK requirements do not fully meet the SPOTT indicator criteria, partial points have been awarded for this indicator on the basis that 100% of the company's wood/woodfibre supply is SVLK certified.

80. Social and environmental impact assessments (SEIAs) available, and associated management and monitoring plans? P 0.5 / 1 [Source](#)
The company provides SEIA public summary but it is unclear if management and monitoring plans are associated.

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 GHGs

10.98 / 22 49.9%

 10 media reports



	P	0.5 / 1	Source
<p>82. Commitment to no planting on peat of any depth?</p> <p>The company commits to no longer be operational in the location of the peatland, but does not use a recognised definition of peatland or specify that no planting on peat of any depth will take place.</p>			
<p>83. Commitment to no planting on peat of any depth applies to all suppliers?</p> <p>The company's peatland commitments are passed onto their suppliers and subcontractors. However, these commitments do not fully cover non-forested peatlands.</p>	P	0.5 / 1	Source
<p>84. Landbank or planted area on peat (ha)?</p> <p>467 (42%) - The company states that out of its total landbank 467 ha is on peatland: 198 ha has been planted with eucalyptus and 269 ha resides in conservation areas.</p>	✓	1 / 1	Source
<p>85. Implementation of commitment to no planting on peat of any depth?</p>	✗	0 / 1	Source
<p>86. Commitment to best management practices for soils and peat?</p> <p>The company states that it aims to improve soil management and provides responsible management of peatlands.</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?</p> <p>The company provides examples of management practices for peat such as making boundaries of peatland conservation, reforestation in peatland ecosystem locations, signage.</p>	P	0.5 / 2	Source
<p>89. Commitment to reduced impact logging?</p> <p>The company commits to the implementation of activities in accordance with the low impact logging.</p>	P	0.5 / 1	Source
<p>90. Commitment to reduced impact logging applies to all suppliers?</p>	✗	0 / 1	
<p>91. Evidence of implementing reduced impact logging practices?</p> <p>The company provides two examples of efforts to reduce the impact of logging.</p>	P	0.75 / 2	Source
<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?</p> <p>The company provides evidence of fire monitoring and management,.</p>	✓ +	1 / 1 0.73 / 1	
<p>95. Details/number of hotspots/fires in company FMUs?</p> <p>0 (0%) - The company reports zero fires in 2019.</p>	✓	1 / 1	Source

<p><input type="checkbox"/> 96. Details/number of hotspots/fires in suppliers operations?</p>	<p>✘ 0 / 1</p>
<p><input type="checkbox"/> 97. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity? No time-bound commitment to reduce GHG emissions intensity was found, despite the company implementing efforts to decrease it.</p>	<p>✘ 0 / 1</p>
<p><input type="checkbox"/> 98. GHG emissions intensity? The company reports GHG emissions from its operations.</p>	<p>P 0.5 / 1 Source</p>
<p><input type="checkbox"/> 99. GHG emissions from land use change? This indicator is disabled as the company reports that it hasn't expanded its plantation area since January 2015.</p>	
<p><input checked="" type="checkbox"/> 100. Progress towards commitment to reduce GHG emissions intensity? The company reports progress towards the commitment to reduce GHG emissions.</p>	<p>P 0.5 / 1 Source</p>
<p><input checked="" type="checkbox"/> 101. Methodology used to calculate GHG emissions? The methodology used in GHG calculations is based upon the 2006 International Panel on Climate Change (IPCC) Guideline and the Greenhouse Gas inventory report of the Indonesian Ministry of environment.</p>	<p>✓ 1 / 1 Source</p>



> Water, chemical and waste management

14 / 22 63.6%

7 media reports



<p><input checked="" type="checkbox"/> 102. Time-bound commitment to improve water use intensity? The company states that it has a time-bound commitment to improve water use intensity but does not state the relevant reduction or the date that it will be achieved by.</p>	<p>P 0.5 / 1 Source</p>
<p><input type="checkbox"/> 103. Water use intensity? 67.2 - The company reports a water use intensity of 67.2 m3/ton pulp.</p>	<p>✓ 1 / 1 Source</p>
<p><input checked="" type="checkbox"/> 104. Progress towards commitment on water use intensity? The company reports a reduction in water use intensity but does not state a target.</p>	<p>P 0.75 / 1 Source</p>
<p><input checked="" type="checkbox"/> 105. Time-bound commitment to improve water quality (BOD and COD)?</p>	<p>✓ 1 / 1</p>
<p><input checked="" type="checkbox"/> 106. Progress towards commitment on water quality (BOD and COD)? The company reports progress on water quality but it is unclear if it is improving.</p>	<p>P 0.5 / 1 Source</p>
<p><input checked="" type="checkbox"/> 107. Treatment of pulp and paper mill effluent? The company provides details of the treatment of effluents but it is unclear if its from pulp and paper mills.</p>	<p>P 0.5 / 1 Source</p>

<p>■ 108. Evidence of sawmill run-off containment and wastewater treatment? This indicator is disabled as the company reports that it doesn't own sawmills.</p>	<p style="text-align: right;">× 0 / 1</p>
<p>■ 109. Proportion of processing facilities with closed-loop water treatment system?</p>	<p style="text-align: right;">✓ 1 / 1 Source</p>
<p>■ 110. Commitment to protect natural waterways through buffer zones?</p>	<p style="text-align: right;">P 0.75 / 1 Source</p>
<p>■ 111. Implementation of commitment to protect natural waterways through buffer zones? [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 style="text-align: right;">P 0.5 / 1 Source</p>
<p>■ 112. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers? The company commits to evaluate and review pesticide usage.</p>	<p style="text-align: right;">P 0.5 / 1 Source</p>
<p>■ 113. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers? The company commits to evaluate and review pesticide usage in its supply chain.</p>	<p style="text-align: right;">P 0.5 / 1</p>
<p>■ 114. Evidence of eliminating chlorine and chlorine compounds for bleaching? The company provides evidence of commitment to eliminating chlorine for bleaching.</p>	<p style="text-align: right;">✓ 1 / 1 Source</p>
<p>■ 115. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?</p>	<p style="text-align: right;">✓ 1 / 1 Source</p>
<p>■ 116. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all suppliers?</p>	<p style="text-align: right;">✓ 1 / 1 Source</p>
<p>■ 117. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?</p>	<p style="text-align: right;">✓ 1 / 1 Source</p>
<p>■ 118. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers?</p>	<p style="text-align: right;">✓ 1 / 1 Source</p>
<p>■ 119. Chemical usage per ha or list of chemicals used? The company reports chemical usage per ha but the source is not dated and therefore points cannot be awarded.</p>	<p style="text-align: right;">✓ 1 / 1 Source</p>
<p>■ 120. Implementation of commitment to reduce chemical usage?</p>	<p style="text-align: right;">× 0 / 2</p>
<p>■ 121. Integrated Pest Management (IPM) approach? 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. Also, the company reports having Integrated Pest Management but the implementation is unclear.</p>	<p style="text-align: right;">P 0.75 / 2 Source</p>

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

[Externally verified] Points for external verification have been awarded on the basis of the company's FSC/PEFC-certification. As the requirements of these certifications do not fully meet the SPOTT indicator criteria limited, externally verified points have therefore been awarded for this indicator. Also, the company reports that it has a waste management system in place.



> Community, land and labour rights

21 / 35 60.7%

⚠ 43 media reports



123. Commitment to human rights? ✓ 1 / 1 Source

124. Commitment to human rights applies to all suppliers? ✓ 1 / 1 Source

125. Progress on human rights commitment? ✗ 0 / 1 Source
The company has a human rights policy but does not report progress on its human rights commitment.

126. Commitment to respect Indigenous and local communities' rights? ✓ 1 / 1 Source

127. Commitment to Indigenous and local communities' rights applies to all suppliers? ✓ 1 / 1 Source

128. Commitment to respect legal and customary land tenure rights? ✓ 1 / 1 Source

129. Commitment to legal and customary land rights applies to all suppliers? ✓ 1 / 1 Source
The company makes this commitment in its human rights policy and also through the PEFC International Chain of Custody Standard (PEFC ST 2002:2013). Full points have therefore been awarded on the basis of the company's PEFC CoC certification.

130. Commitment to free, prior and informed consent (FPIC)? ✓ 1 / 1 Source

131. Commitment to free, prior and informed consent (FPIC) applies to all suppliers? ✓ 1 / 1 Source

132. Details of free, prior and informed consent (FPIC) process available? ✓ 1 / 1 Source

133. Examples of local stakeholder engagement to prevent conflicts? ✗ 0 / 1

134. Details of process for addressing land conflicts available? ✓ 1 / 1 Source

135. Supports the inclusion of women across forestry operations, including addressing barriers faced?

■ **136. 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 reports that it doesn't operate in a geography currently covered by Open Timber Portal.

✘ 0 / 1

■ **137. Commitment to enable sustainable use of non-timber forest products (NTFPs) by local communities?**

✓ 1 / 1 [Source](#)

■ **138. Commitment to provide essential community services and facilities ?**

P 0.75 / 2

■ **139. Progress on commitment to provide essential community services and facilities?**

The company reports progress on this, but the information is not externally verified, so partial points have been awarded.

✘ 0 / 1

■ **140. Commitment to provide business/work opportunities for local communities?**

■ **141. 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 reports that it doesn't operate in a geography currently covered by Open Timber Portal.

✓ 1 / 1 [Source](#)

■ **142. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles?**

The company makes this commitment through the PEFC International Chain of Custody Standard (PEFC ST 2002:2013). Full points have therefore been awarded on the basis of the company's PEFC CoC certification.

✓ 1 / 1 [Source](#)

■ **143. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles applies to all suppliers?**

The company makes this commitment through the PEFC International Chain of Custody Standard (PEFC ST 2002:2013). Full points have therefore been awarded on the basis of the company's PEFC CoC certification.

P 0.75 / 1 [Source](#)

■ **144. Progress on commitment to respect all workers' rights?**

The company provides evidence of progress on the commitment to respect all workers' rights but this is not externally verified, therefore full points cannot be awarded.

✓ 1 / 1 [Source](#)

■ **145. Commitment to eliminate gender related discrimination with regards to employment?**

✘ 0 / 1

■ **146. Commitment to eliminate gender related discrimination with regards to employment applies to all suppliers?**

✘ 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?**

452 (45%) - This figure represents temporary company employees in 2018.

<input type="checkbox"/> 149. Percentage or number of women employees? 370 (37%) - This figure represented the percentage/number of women employees in 2019.	✓	1 / 1	Source
<input type="checkbox"/> 150. Commitment to pay at least minimum wage?	✓	1 / 1	Source
<input type="checkbox"/> 151. Commitment to pay at least minimum wage applies to all suppliers?	✓	1 / 1	Source
<input type="checkbox"/> 152. Progress on commitment to pay at least minimum wage?	✗	0 / 1	
<input type="checkbox"/> 153. Reporting of salary by gender?	✗	0 / 1	
<input type="checkbox"/> 154. Commitment to address occupational health and safety? The company has a commitment to address occupational health and safety but the ILO Code of Practice on Safety and Health in Forestry Work is unclear.	P	0.5 / 1	Source
<input type="checkbox"/> 155. Commitment to address occupational health and safety applies to all suppliers? The company has a commitment to address occupational health and safety for its suppliers but the ILO Code of Practice on Safety and Health in Forestry Work is unclear.	P	0.5 / 1	Source
<input type="checkbox"/> 156. Provision of personal protective equipment and related training? The company commits in its OSH Policy the provision of right PPE and right method in using it while also giving examples of both in its annual report. However, full points cannot be awarded as the information is not externally verified.	P	0.75 / 1	Source
<input type="checkbox"/> 157. Time lost due to work-based injuries?	✗	0 / 1	
<input type="checkbox"/> 158. Number of fatalities as a result of work-based accidents?	✗	0 / 1	



> Smallholders and suppliers

475 / 8 59.4%

3 media reports



<input type="checkbox"/> 159. Commitment to support smallholders?	✓	1 / 1	Source
<input type="checkbox"/> 160. Programme to support outgrower scheme and/or independent smallholders?	✗	0 / 1	
<input type="checkbox"/> 161. Percentage of outgrower scheme and/or independent smallholders involved in programme?	✗	0 / 1	

<p>162. Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements?</p> <p>The company has a process to prioritise, assess and/or engage suppliers on compliance with the company's policy and/or legal requirements but it is unclear if it covers all three elements of due diligence system.</p>	P	0.5 / 1	Source
<p>163. Number or percentage of suppliers assessed and/or engaged on compliance with company's policy and/or legal requirements?</p> <p>256 (94.81%) - The company reports 94.81% of its suppliers have complied with company/government regulations/policies.</p>	P	0.75 / 1	Source
<p>164. Suspension or exclusion criteria for suppliers?</p>	✓	1 / 1	Source
<p>165. Timebound action plans (including Key Performance Indicators) for suppliers to be in compliance with timber and pulp sourcing commitments?</p>	✓	1 / 1	Source
<p>166. Proportion of direct and indirect supply that comes from FMUs which are compliant with timber and pulp sourcing policies?</p> <p>The company reports the amount of supply from company-owned FMUs but the compliance of direct and indirect supply is not provided.</p>	P	0.5 / 1	Source



> Governance and grievances

15 / 17 64.3%

! 15 media reports



<p>167. Commitment to ethical conduct and prohibition of corruption?</p>	✓	1 / 1	Source
<p>168. Commitment to ethical conduct and prohibition of corruption applies to all suppliers?</p>	✓	1 / 1	Source
<p>169. Progress on commitment to ethical conduct and prohibition of corruption?</p>	✗	0 / 1	
<p>170. Company has provided valid legal documents to Open Timber Portal on legal registration (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>171. Disclosure of the company's management approach to tax and payments to governments?</p>	✗	0 / 1	Source
<p>172. Company has provided valid legal documents to Open Timber Portal on taxes, fees and royalties (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>			

■ 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? The company provides month, status and categories of the grievances.	P	0.5 / 1	Source

Media monitor: Toba Pulp Lestari

SPOTT monitors global media sources for coverage of assessed companies. The media monitor gathers reports about specific activities related to the assessment indicator categories. ZSL does not assess or score the validity of media coverage, but users can explore the media monitor to provide context on implementation, and infer risks associated with reported operations on the ground.

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