	SGS QUALIFOR (Associated Documents)	Doc. Number:	AD 54-F-07
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		Approved by:	Gerrit Marais

Controlled wood risk assessment report

INTRODUCTION

This document must be used with the RD 15-01 - Guideline - Approach and criteria for assessing risk when uncertified controlled wood is used in FSC certified products and FSC-ADV-40-016 V2 - Implementation of FSC Controlled Wood requirements in FSC STD-40-005 V2-1 and FSC-STD-20-011 V1-1.

This template is a guideline to do the risk assessment and must not be seen to include all information. Any other sources of information may be added to ensure that all detail was analysed.

This assessment must be done on origin of uncertified wood that will be used in FSC products as controlled wood.

If it is determined that the material is classified as being from a source that is classified as unspecified risk, the requirements of the RD16 – Guideline – Requirements for company verification program must be followed. This will be audited annually.

Note: This document details all the elements that are required to do the risk assessment. However, the document is divided into a “Restricted Information” section and a “Public Information” section. Only the information recorded in the “Public” section will be available on the FSC website. The information in the “Restricted” section will be covered by the SGS rules of confidentiality and will not be disclosed.

The Risk Assessment requires a precautionary approach. Any area worldwide is therefore considered “unspecified risk” until “low risk” can be determined in line with the risk assessment set out hereunder (refer Section 1.1 of FSC-STD-40-005)

The following is important:

1. The Risk Assessment shall begin at the broadest relevant scale. If conditions at a given scale are not sufficiently homogeneous to establish low risk, the scale shall be further decreased. The Risk Assessment shall be continued at decreasing scales until conditions are sufficiently homogeneous.
2. Risk designation may be possible at a national level under certain homogenous conditions, whereas under more heterogeneous conditions, risk designation may only be possible at a district or local level and/or at the level of subsets of eco-regions.
3. If more than one supplier is from the same low risk country only one risk assessment need to be completed for the specific country.
4. Companies are expected to review their risk assessments at least once per year to verify the continued correctness of their risk designations for each indicator of the five FSC Controlled Wood categories. This should be conducted before the annual surveillance by the certification body in which the certification body is expected to verify the revision process. When significant changes to the risk profile become evident (i.e. changes in the law, breakdown in rule of law through civil unrest, etc) the company shall review its risk assessment
5. The document must be completed in one of the two official language of FSC (English or Spanish).

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RESTRICTED INFORMATION

1. COMPANY DETAIL

Company name		Nuqul Tissue group
Project number:		2284 – EG
Certificate number:		SGS-COC-005172
Controlled wood Certificate number		SGS-CW-005172
Country:		Egypt - Jordan
Company address		Physical Address: Central Office and Al Sindian 4 th Industrial zone. Al-Sindian Paper mill Co S.A.E. (FINE). 6th of October City, Giza.
Contact detail:	Contact person:	Mohammed Barakat / OR Robert Walker.
	Telephone:	+202 38285876. OR +202 38285851
	Fax:	+202 38330747
	e-mail Address	mbarakat@nuqulgroup.com / rwalker@nuqulgroup.com
Assessment done by:		Mohamed Barakat
Relation to the company:		Business Excellence Manager / Or Operations Director
Date:		May 27 2014
Signature		Mohamed Barakat

2. APPROVAL BY SGS

SGS auditor:	Ahmed Fareed Ebraheem Mousa
Comments:	Approved
Date:	June 09, 2014

3. SUPPLIER'S DETAIL

Company Name:	Fibre-Excellence
Country:	France
District:	Aquitaine, Auvergne, Languedoc Roussillon, Limousin, Midi Pyrenees, Provence Alpes Cote d'Azur, Rhone Alpes

4. LIST OF DISTRICTS OF ORIGIN

List the districts of origin of timber supplied within the company's FSC Controlled Wood Program.

Product	Species	District	Country
Fibre Excellence softwood and hardwood kraft pulps	SW: Pseudotsuga menziesii, Picea Abies, Pinus Halepensis, Pinus Nigra, Pinus Pinaster, Pinus Sylvestris HW: Betula Pendula Roth, Castanea Sativa, Quercus spp, Fagus Silvatica, Populus spp, Platanus	Aquitaine Auvergne Languedoc Roussillon Limousin Midi Pyrenees Provence Alpes Cote d'Azur Rhone Alpes	France

5. SUPPLY CHAIN

Manufacturers or traders that wish to control their timber sources within their own verification program shall demonstrate to the satisfaction of their certification body that its supply chain is identifiable and traceable down to the district (forest) level.

Company	Process	Input and origin	Controlled system verified
Fibre-Excellence	Manufacture of pulp from purchased round wood which are made to chips by the company	Wood purchased directly from the forest owners in the districts mentioned on 3.	All raw material is tracked through a certified PEFC chain of custody system that accounts for certified and uncertified sources. Also ISO14001 certification.

FSC Controlled Wood Risk Assessment

PUBLIC INFORMATION

A COMPANY DETAIL

Company name	Nuqul Tissue Mills
Project number:	2284 – EG
Certificate number:	SGS-COC-005172
Controlled wood Certificate number	SGS-CW-005172
Country:	Egypt - Jordan

B APPROVAL

Approving Certification Body:	SGS South Africa (Pty) Ltd - Qualifor Programme PO Box 82582 Southdale South Africa 2135 E-mail Address: Foretry@sgs.com
Date of Risk Assessment	May 27, 2014
Comments:	Approved
Date Approved:	09 June 2014

C ORIGIN OF TIMBER

Country:	France		
District	Aquitaine Auvergne Languedoc Roussillon Limousin Midi Pyrénées Provence Alpes Côte d'Azur Rhône Alpes		
Risk Assessment Level (indicate the risk for the different levels)	Country	District	FMU
	Low risk	Low risk	Low risk

D RESULT OF RISK ASSESSMENT

Type of source e.g. natural forest or plantations and general description of the supplier	The wood is coming from both natural forests owned by small forest owners and plantations (poplar, Douglas Fir, Black Pine and Maritime Pine). There are no intermediate steps in the supply chain.
Results (Low or Unspecified Risk and motivation:	LOW RISK following the results from available sources as listed below.

SPECIFIC REQUIREMENTS FOR EACH FSC CONTROLLED WOOD CATEGORY

1. ILLEGALLY HARVESTED WOOD

1.1 The district of origin may be considered low risk in relation to illegal harvesting when all the following indicators related to forest governance are present:

Requirements	Examples of sources of information	Finding & Evidence (FSC-ADV-40-016 v2 - Sources of information used to assess the indicators must be listed)	Result	
			Unspecified risk	Low
1.1.1 Evidence of enforcement of logging related laws in the district	<p>FSC National Initiatives (contacts from www.fsc.org); http://www.Transparency.org</p> <p>The Royal Institute of International Affairs (www.illegal-logging.org);</p> <p>Environmental Investigation Agency (www.eia-international.org);</p> <p>Global Witness: (www.globalwitness.org);</p> <p>Telapak (for Indonesia - www.telapak.org);</p> <p>UK Government's Department for International Development (DFID)</p> <p>EU FLEGT process: http://ec.europa.eu/comm/development/body/the_me/forest/initiative/index_en.htm</p> <p>Transparency international index (www.transparency.org) Corruption perceptions</p> <p>WWF (www.panda.org);</p> <p>ELDIS (www.eldis.org) regional and country profiles www.cites.org</p> <p>NGOs and involved stakeholders</p>	<p>Forestry exploitation is subject to strict regulation in France (legislation is assembled in the Forestry Code ; http://www.legifrance.gouv.fr).</p> <p>Forests subject to the forestry regime (state-owned forests, community forests) are managed by the Office National des Forêts (ONF). Logging is planned in accordance with forest development and is carefully controlled and monitored by ONF officials.</p> <p>Private forest estates of 25 hectares belonging to one owner are managed in accordance with a Plan Simple de Gestion - PSG (Simple Management Plan) which is certified by the Centre Régional de la Propriété Forestière - CRPF. (Regional Centre of Forest Ownership.) The Plan Simple Gestion - PSG plans the logging schedule to be carried out in the forest. Any scheduled logging by the PSG can be brought forward or put off for five years without consulting the CRPF. Beyond or short of this limit, any logging is subject to CRPF authorisation.</p> <p>On all estates of more than 25 hectares not having a PSG, any logging is subject to an authorisation which is granted by ministerial authority.</p> <p>For forests covering an area of less than 25 hectares, there are other guarantees of sustainable management such as:</p> <ul style="list-style-type: none"> • Membership to the Code of Sylvicultural Good Practice. • Membership to the OGEC (Organisme de Gestion Commun) (Common Management Organisation) which has a RTG (Règlement 	Low risk	

		<p>type de Gestion) (Standard Management regulations).</p> <p>For private forests which don't have a guarantee of sustainable management, recent regulation has modified the Forestry Code (article L10): logging which clears more than 50% of the volume of the forest in any area of more than 10 hectares is subject to authorisation if exceeding the surface threshold as determined by ministerial order</p>	
<p>1.1.2 There is evidence in the district demonstrating the legality of harvests and wood purchases that includes robust and effective systems for granting licenses and harvest permits.</p>		<p>In forests managed by the ONF, by the DDT or by any other forestry management body, an exploitation permit is issued before the logging can commence. This permit is generally sent to the logger subject to the means of payment determined</p> <p>Annex The ONF exploitation permit</p> <p>Article R135 – 1 from the Forestry Code</p> <p>The permit to exploit as defined in Article L 135-2 is issued by the duly authorised officer of the Office National des Forêts.</p> <p>Article L135 – 2 from the Forestry Code.</p> <p>Purchasers cannot begin logging unless having obtained a written permit to exploit, under penalty of being sentenced as an offender or violator for the wood they may have logged.</p> <p>In private forests, the exploitation deadlines are set by the owner. The same rule applies for the commencement date of the work.</p> <p>Annex Logging authorisation in accordance with the Forestry Code (Source CRPF)</p> <p>Administrative authorisation request for the logging of wood.</p>	<p>Low risk</p>
<p>1.1.3 There is little or no evidence or reporting of illegal harvesting in the district of origin.</p>		<p>Wood which has been harvested in violation of any enforced local laws concerning exploitation or the acquisition from the rightful owners, the methods of exploitation used and the payment of all appropriate taxes and fees.</p> <p>Forestry exploitation is strictly regulated in France (legislation is assembled in the Forestry Code; http://www.legifrance.gouv.fr).</p>	<p>Low risk</p>

<p>1.1.4 There is a low perception of corruption related to the granting or issuing of harvesting permits and other areas of law enforcement related to harvesting and wood trade</p>		<p>France is strictly regulated concerning the appropriation and issuing of logging permits and in law enforcement regarding the harvest and trade of wood. (Legislation assembled in the Forestry Code; http://www.legifrance.gouv.fr).</p> <p>Corruption Perceptions Index (CPI).</p> <p>Most of the 180 countries taking part in the 2009 Index scored a grade lower than five on a scale of 0 (high degree of corruption perceived) to 10 (low degree of corruption perceived). The CPI evaluates the perception of the degree of corruption affecting public officials in a given country. It is a poll, based on 13 different surveys carried out in companies by experts and independent bodies.</p> <p>Source : http://www.transparency.org/</p> <p>France doesn't show a high risk of corruption concerning the appropriation and issuing of logging permits and in law enforcement regarding the harvest and trade of wood. To day this index reaches 7</p> <p>In May 2003 the European Commission voted an action plan - the FLEGT (Forest Law Enforcement, Governance and Trade) to enforce better governance on producing countries and to co-produce voluntary partnership agreements to prevent the entry of illegal wood into the European Union. It also aims to encourage Europeans to reduce the purchase of illegal wood. Moreover EUTR (European Union Timber Regulation) forbid the wood trade and wood by products from an illegally logged wood.</p> <p>Source : http://www.agriculture.gouv.fr</p> <p>The species of wood (Hardwoods and Softwoods) listed in the above table are used in the factories to manufacture cellulose pulp.</p> <p>The species listed in the above table are not mentioned in the annexes of the Washington Convention nor in the annexes of the Community regulations (CE No.338 /97)</p>	<p>Low risk</p>
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2 WOOD HARVESTED IN VIOLATION OF TRADITIONAL OR CIVIL RIGHTS

2.1 The district of origin may be considered low risk in relation to the violation of traditional, civil and collective rights when all the following indicators are present:

Requirements	Examples of sources of information	Finding & Evidence	Result
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		(FSC-ADV-40-016 v2 - Sources of information used to assess the indicators must be listed)	Unspecified risk	Low
2.1.1	There is no UN Security Council ban on timber exports from the country concerned;	E.g. This has applied to Liberia, as of July 2003 (www.un.org/esa/africa/UNNews_Africa/timber.htm) Global Witness www.globalwitness.org	There is no UN Security Council ban on the country. /GFRR France is not concerned by such a decision	Low risk
2.1.2	The country or district is not designated a source of conflict timber (E.g. USAID Type 1 conflict timber);	The final report of the expert panel on illegal exploitation of natural resources and other forms of wealth in Democratic Republic of Congo, 2002, Annexes I and III (S/2002/1146) Conflict Timber: Dimensions of the Problem in Asia and Africa. Volume I. Synthesis report. June 2003, available at: www.usaid.gov/hum_response/oti/pubs/vol1synth.pdf	The country is not associated with or designated source of conflict timber according to latest available research. /GFRR. France is not in a disputed wood zone according to the definition of the USAID.	Low risk
2.1.3	There is no evidence of child labour or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the district concerned	FSC National Initiatives and Regional Offices contacts www.fsc.org ILO country offices	Labour in France is governed by the Employment Law. To day the forest labour rules on forest yards are clearly and well defined by the N° 2010-1603 Council of State order. School is compulsory until the age of 16; exceptions have been established in France for "clearly defined objectives": <ul style="list-style-type: none"> • work placement schemes • apprentice-ship sandwich courses • casual labour during school holidays • helping the family (shopwork, craft industry, and agriculture). The policy is that a child cannot work until he is free of compulsory education that's to say over 16. Under this age he/she can enter the labour force but under certain conditions. However there are certain exceptions to this age threshold: <p>If a minor begins an apprenticeship at the age of 16, this age can be lowered to 15 for children who can prove they have completed the first stage of secondary education. These conditions are the same for jobs in farming;</p> Children who are at least 15 can start work on a ship; Children who are 14 can do casual labour during their school holidays ; Children who are 13 can work on their parents' farm under their supervision : Children posing for fashion photos, taking part in advertising, films and shows are generally allowed to do so at any age with the agreement of their parents. But there too, regulation is very	Low risk

		<p>strict.</p> <p>In all cases, the employer must ensure that the minor's parents agree before hiring him/her. However the industrial tribunal sometimes considers that when a minor between 16 and 18 shows up on his own to his future employer silent authorisation has been given.</p> <p><i>Disputes with employers.</i></p> <p>When a dispute between a minor and his employer occurs, the industrial tribunal intervenes.</p> <p>The Law states that minors who cannot be accompanied by their parents or their guardians, are allowed by the tribunal, to take legal action against their employers on their own, or to seek defence if the employer has started the proceedings.</p> <p>Moreover the Employment Law calls for the presence in person of the employer and his employee. This means that the minor must be present at the Industrial Tribunal alone or in the presence of his/her parents. In all cases it is advisable for children who wish to stand at the tribunal alone to get help from a lawyer. Legal aid is possible in this case, the State paying all costs if the minor's income is lower than a certain level.</p>	
<p>2.1.4 There are recognized and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the district concerned;</p>	<p>FSC National Initiatives and Regional Offices contacts www.fsc.org</p> <p>Indigenous Peoples Organizations</p> <p>Local community associations in the district</p> <p>Risk register</p> <p>National Sources (e.g. records of land claims negotiation concluded or in progress, summaries of court decisions)</p>	<p>In France there are frequent users' rights through forests subject to the forestry regime and more rarely through privately owned forest. The rules concerning these rights of way are detailed in the Forestry Code. If possible disputes can't be brought to a friendly agreement they must be settled in court.</p> <p>In France there are a certain number of forest users: hikers, hunters, fishermen, bird-watchers etc. These different users are part of recognised associations and certified by ministerial order. These associations can defend their members' interests within the framework of the different work groups or commissions on a local or regional government level: Regional Site Commission, The Forest and Forest Products Regional Commission (C.R.F.P.F).</p> <p>In the event of a dispute, which can't be brought to a friendly agreement, it is taken to court.</p> <p>Associations can sue for damages.</p>	<p>Low risk</p>
<p>2.1.5 There is no evidence of violation of the ILO Convention</p>	<p>FSC National Initiatives and Regional Offices contacts www.fsc.org</p>	<p>By "indigenous people" are considered people and populations as described in the United Nations</p>	<p>Low risk</p>

<p>169 on Indigenous and Tribal Peoples taking place in the forest areas in the district concerned.</p>	<p>ILO country offices</p>	<p>article: "The concept of indigenous people" PF11/2004/WS. 1/3.</p> <p>According to the United Nation's definition, there are no indigenous people in mainland France.</p> <p>FIBRE EXCELLENCE and the (ILO)</p> <p>Throughout France, labour regulations, implemented by FIBRE EXCELLENCE in all its activities comply with the different conventions established by the ILO.</p>	
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3 WOOD HARVESTED FROM FOREST IN WHICH HIGH CONSERVATION VALUES ARE THREATENED BY MANAGEMENT ACTIVITIES

3.1 The district of origin may be considered low risk in relation to any threat to high conservation values if:

- a) indicator 3.1 is met; or
- b) indicator 3.2 eliminates (or greatly mitigates) the threat posed to the district of origin by non-compliance with 3.1

Requirements	Examples of sources of information	Finding & Evidence (FSC-ADV-40-016 v2 - Sources of information used to assess the indicators must be listed)	Result	
			Unspecified risk	Low
<p>3.1.1 Forest management activities in the relevant level (eco-region, sub-eco-region, local) do not threaten eco-regionally significant high conservation values;</p>	<p>FSC documentation on HCVPs: www.fsc.org</p> <p>Eco-region definition and information: http://www.worldwildlife.org/science/ecoregions.cfm</p> <p>Those regions identified by Conservation International as a Biodiversity Hotspot</p> <p>(or) Those ecosystems and communities that are explicitly identified by Conservation International as a key component of a <i>Biodiversity Hotspot</i></p> <p>Those forest, woodland, or mangrove eco-regions identified by World Wildlife Fund as a <i>Global 200 Eco-region</i> and assessed by WWF as having a conservation status of <i>endangered</i> or <i>critical</i>. If the Global 200 Eco-region comprises more than a single terrestrial eco-region, an eco-region within the Global 200 Eco-region can be considered low risk if the sub-eco-region is assessed with a Conservation Status other than "<i>critical/endangered</i>."</p>	<p>Concerning criteria 3.1 and 3.2 above the following comments can be made.</p> <p>Legislation has set out numerous protection measures which enable an efficient protection of species and natural habitats. This legislation is part of the Environmental Code.</p> <p>Concerning natural habitats, we can mention:</p> <ul style="list-style-type: none"> ▪ Protection forests ▪ Biotope decrees ▪ Protection of graded or listed sites ▪ Listed woodlands ▪ Natura 2000 sites and the DOCOB (Document Objectif) attached like the management target and statement for this sites progressively adopted. ▪ Wetlands and watershed protection ▪ National parks ▪ Regional parks <p>The protection of species occurs on several levels : on an international, national and regional level and concerns both fauna and flora.</p> <p>On an international level, France is a member of the IUNC (International Union for Nature</p>	<p>Low risk</p>	

	<p>Those regions identified by the World Conservation Union (IUCN) as a <i>Centre of Plant Diversity</i></p> <p>Those regions identified by Conservation International as a <i>High Biodiversity Wilderness Area</i> that are forests and contain contiguous forest ecosystems greater than 500 km².</p> <p>Those regions identified by the World Resources Institute as a <i>Frontier Forest Intact Forests Landscapes</i>, as identified by Greenpeace (www.intactforests.org)</p>	<p>Conservation) which establishes lists of protected species. National ban lists including endangered mammals, amphibians, reptiles and other endangered species.</p> <p>France has also approved the Convention of International Trade in Endangered Species, known under the abbreviation of "CITES" or Washington Convention. European regulation (no. 338/97 dated 9th December 1996) regarding wild flora and fauna species protection, through control of trade, enforces the European Union member states to apply "CITES" principles and clauses.</p> <p>France is also a signatory – of the Ramsar Convention for Bio-diversity since 1992 (Convention for the protection of wetlands).</p>	
<p>3.1.2 A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the eco-region;</p>	<p>FSC National Initiatives</p> <p>Signatory to the Convention on Biological Diversity https://www.biodiv.org/world/parties.asp and demonstrable progress towards completing a network of protected areas, such as an overall positive analysis of the latest country thematic report on Forest Ecosystems https://www.biodiv.org/reports/list.aspx?type=for</p>	<p>On a national level, there is a list of protected species; it is complemented by lists on a regional level which have been established by ministerial decree.</p> <p>1.1</p> <p>In France no FHVC, as understood by the FSC has been listed to this day. There has been no accurate localisation of the six types of HVCF. HVCF localisation work must be led by French environmentalists and naturalists in collaboration with the FSC association France.</p> <p>The Fibre Excellence group has not taken any particular steps concerning HVCF conservation for the simple and good reason that it doesn't own forest. In France forest belong to private owners, communities and the State. It is their duty to protect their forests in accordance with the rules and restrictions as defined by the French Authorities.</p> <p>The forest loggers and the sawmills managers are the customers of the forest owners; consequently, they must:</p> <ul style="list-style-type: none"> • conform to the French law; • accept the terms set out and signed in the sales contract with the forest owners which incorporates technical, administrative and specific constraints concerning the plots to be logged. <p>To obtain the Controlled Wood Certificate, the Fibre Excellence group has increased its suppliers' awareness so that they agree to supply wood from controlled sources. In accordance with standard requirements FSC-STD-40-005, suppliers must agree not to supply wood coming from the following five categories :</p> <ol style="list-style-type: none"> 1. Illegally harvested wood; 	<p>Low risk</p>

2. Wood harvested in violation of traditional and civil rights ;
3. Wood harvested in forests where high conservation values are threatend by management activities ;
4. Wood harvested in forests being converted to plantations or non-forest use;
5. Wood from forests in which genetically modified trees are planted:

The Fibre Excellence group's wood suppliers liaise with the resource holders (private and public owners). Their intervention ensures that the riches of the forest are preserved. When they work in public forests they must respect the ONF (Office National des Forêts) standard specifications. When they work in private forest, they must respect the environmental areas guidelines.

For example, in Natura 2000 (guidelines set out by the EU), the owners of listed forest are responsible for implementing the document (Docob) which establishes the forest management and the harvest rules to protect the particular biodiversity which is the base of Natura listing system.

In France, each local government establishes its own action guidelines. For example in Provence Alpes Cote d'Azur and in Languedoc Roussillon, which are two sensitive regions there is a « fire clause ». This clause requires forest owners to keep clear the roadside verges to limit the break-out of fires. In these regions a strong ONF presence is felt and the specifications are very much based on the protection of forest ecosystems.

Furthermore, as part of SEBSO forest management certification FSC STD-01-001 V1, we have had to specify the HFVC ideas for our company. You will find this analysis attached.

This analysis has thus enabled SEBSO and only SEBSO to define the different types of FHVC found in the South of France This analysis which is strictly private but validated by the different parties concerned is not however an official document; it can't be imposed on the Fibre Excellence wood suppliers network.

Perhaps in the future, it could become a base for the French FSC transcriptions.

Parts of the regions in the South of France (parts of Provence Alpes Cote d'Azur et Languedoc Roussillon) are part of the « Global 200 Ecoregion », the 123 Ecoregion (Mediterranean Forests, Woodlands and Scrub) as is shown on the map below.

		<p>Existing regulation concerning nature wild areas and animal and plant species is well-structured and unsupervised forest activity is not authorised by the law.</p> <p>WWF global 200</p> <p>WWF Global 200 is an attempt to identify a set of ecoregions whose conservation would achieve the goal of saving a wide diversity of the Earth's ecosystems. These ecosystems include those with exceptional levels of biodiversity such as high species richness or endemism or those with unusual ecological or evolutionary phenomena.</p> <p>In February 1998, the European Commission adopted a paper concerning the community's strategy in favour of biodiversity. This strategy planned to establish and put into place specific action plans relating to the fields of activity concerned. The present paper establishes action plans regarding the protection of natural resources in agriculture, fishing and also helps economic co-operation and development.</p> <p>(http://europa.eu/scadplus/leg/fr/lvb/l28037.htm)</p> <p>French strategy in favour of biodiversity (http://europa.eu/scadplus/leg/fr/lvb/l28183.htm)</p> <p>This strategy, established in 1998 fixed a general framework in which the community's own policies and means concerning the requirements of the Rio de Janeiro convention on biodiversity are outlined. The focus is on four main themes in which specific targets are set and put into place, in particular through different plans of action</p> <p>Statement of the strategy developed concerning the forest in France.</p> <p>To ensure that forest management does not affect biological diversity or the ecological quality of the areas in question and ensure re-forestation : promote research and evaluate environmental impact, etc.</p>	
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4 WOOD HARVESTED FROM AREAS BEING CONVERTED FROM FORESTS AND OTHER WOODED ECOSYSTEMS TO PLANTATIONS OR NON-FOREST USES

- 4.1. The district of origin may be considered low risk in relation to conversion of forest to plantations or non-forest uses when the following indicator is present:

[Note: the change from plantations to other land uses is not considered as conversion].

Requirements	Examples of sources of information	Finding & Evidence (FSC-ADV-40-016 v2 - Sources of information used to assess the indicators must be listed)	Result	
			Unspecified risk	Low
4.1.1 There is no net loss AND no significant rate of loss (> 0.5% per year) of natural forests and other naturally wooded ecosystems such as savannahs taking place in the eco-region in question	<p>FAO GOFC-GOLD Global Observation of Forest and Land Cover Dynamics</p> <p>FAO Global Forest Resources Assessment</p> <p>Conservation International Regional Analysis Program</p> <p>University of Maryland Department of Geography</p> <p>UNEP/GRID – Division of Early Warning and Assessment</p> <p>SERVIR – Regional Monitoring and Visualization System for Mesoamerica</p> <p>Congo Basin Forest Partnership and CARPE</p> <p>CEC Joint Research Centre</p> <p>INPE-PRODES – Brazil's National Institute for Space Research</p> <p>Hansen, M., DeFries, R., Townshend, J.R., Carroll, M., Dimiceli, C., Sohlberg, R. 2003. 500 m MODIS Vegetation Continuous Fields. College Park, Maryland: The Global Land Cover Facility.</p> <p>National data sources</p> <p>FSC National Initiatives and Regional Offices contacts www.fsc.org</p>	<p>For the FSC (Forest Stewardship Council), natural forests are intact forest landscapes. France doesn't possess intact forest landscapes such as can be found in Brazil or in Africa. Consequently, France isn't concerned by this issue.</p> <p>For the requirements of risk assessment, we have extended our study towards undisturbed forest as defined by the IFN.</p> <p>Definition of "undisturbed forest" according to the IFN.</p> <p>Forests characterised by the presence of groups of trees since time immemorial, uniquely made up of indigenous species and without trace of human activity for at least 50 years.</p> <p>The value for private forest has been estimated by the IFN using the same ratio between "non-disturbed" forest and unexplainable forest, as for state forest, which is possibly a slight over-estimation. In fact there is less private forest in mountainous areas, where most "undisturbed" forest is found.</p> <p>The concept of « naturalness » remains difficult to appreciate. Recent work by the National Institute of Agronomic Research (INRA) revealed the significant interest of the concept of "ancient forest" which could lead to establishing a further indicator. This indicator based on the age of the wooded area and not on the age of the trees or the planting structure aims to reveal the diversity and the way in which forest ecosystems work. This research succeeded in identifying certain plants association's characteristics in ancient forest.</p> <p>Undisturbed forest</p> <p>French mainland forest has been greatly shaped by man throughout its history. Only 30,000 hectares of the surface area covered by forest has been considered undisturbed for at least 50 years, essentially in the mountains and in certain inaccessible zones. This assessment is difficult to carry out and couldn't be updated.</p> <p>Principle 10 from the FSC forest management framework of reference concerning plantations states through criteria 10.9 that:</p>	Low risk	


		<p>Plantations carried out in natural forest after November 1994 cannot be certified.</p> <p>The following table shows us that the area covered by "undisturbed forest "in France has not decreased since 1989.</p> <p>Consequently we can be sure that there isn't any wood harvested in natural forest being converted into plantation or in non-forest use areas in France. France is not considered controversial in connection with criteria 10.9 of the FSC forest management framework of reference.</p>	
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5 WOOD FROM FORESTS IN WHICH GENETICALLY MODIFIED TREES ARE PLANTED

5.1 Requirements related to wood from forests in which genetically modified trees are planted

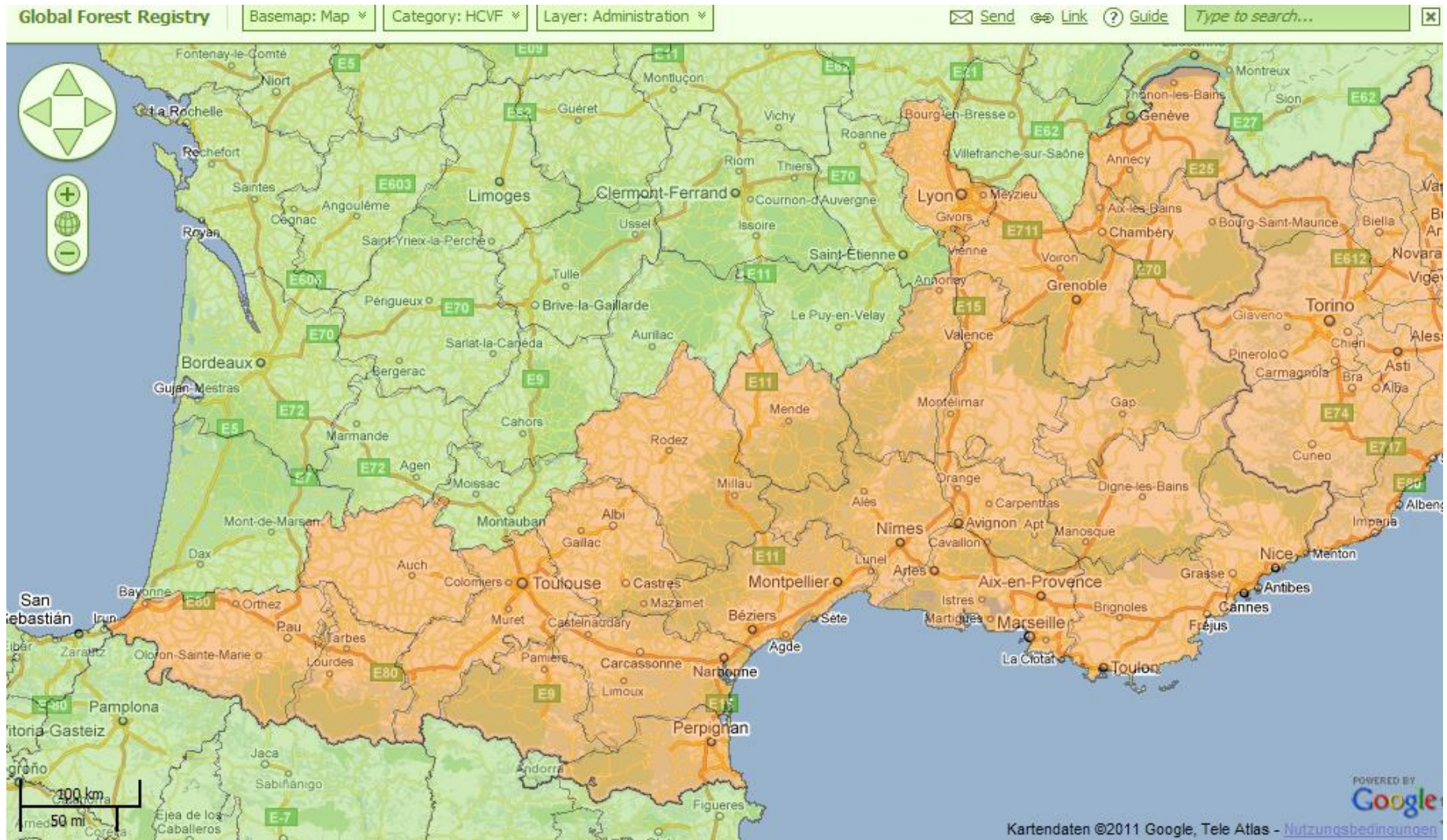
Requirements	Examples of sources of information	Finding & Evidence (FSC-ADV-40-016 v2 - Sources of information used to assess the indicators must be listed)	Result	
			Unspecified risk	Low
<p>5.1.1 The district of origin may be considered low risk in relation to wood from genetically modified trees when one of the following indicators is complied with:</p> <p>a) There is no commercial use of genetically modified trees of the species concerned taking place in the country or district concerned. OR</p> <p>b) Licenses are required for commercial use of genetically modified trees and there are no licenses for commercial use OR</p> <p>c) It is forbidden to use genetically modified trees commercially in the country concerned.</p>	<p>FAO, 2004. Preliminary review of biotechnology in forestry, including genetic modification. Forest Genetic Resources Working Paper FGR/59E. Forest Resources Development Service, Forest Resources Division, Rome, Italy. Available online: http://www.fao.org/docrep/008/ae574e/AE574E00.HTM</p> <p>National and regional data sources</p>	<p>Currently no variety of transgenic forest has been planted in Europe beyond areas given over to scientific research.</p> <p>To this day, in France, only very small areas (around a few acres) of poplar plantation are grown in field experiments. The wood produced in these experimental areas must be used for analysis or destroyed. Any commercial use would require special authorisation. The situation of GMT throughout the world is shown on the map below. (Source document FAO : « Preliminary review of biotechnology in forestry, including genetic modification », December 2004).</p> <p>France is located in the zone for « field experiments ».</p>	Low risk	

6 GENERAL

Requirements	Examples of sources of information	Finding & Evidence (FSC-ADV-40-016 v2 - Sources of information used to assess the indicators must be listed)	Result	
			Unspecified risk	Low
General search on the company	<p>http://www.laprovence.com/article/economie-a-la-une/tembec-cede-ses-usines-de-tarascon-et-saint-gaudens</p>	<p>Tembec cède ses usines de Tarascon et Saint-Gaudens</p> <p>12 contributions</p> <p>Publié le mardi 13 avril 2010 à 08H36</p> <p>Le groupe canadien a conclu un accord avec un investisseur indonésien</p>  <p>L'usine de Tarascon, qui produit 280 000 tonnes de pâte kraft, emploie 270 salariés. Paper excellence va l'intégrer dans une filiale : "Fibre excellence". Photo LP</p> <p>L'ex-cellulose du Rhône, devenue propriété du groupe canadien Tembec qui l'avait acquise auprès du français La Rochette en 2001, va de nouveau changer de propriétaire. Dans quelques semaines en effet, le site de Tarascon, celui de Saint-</p>	Low risk	

		<p>Gaudens en Haute-Garonne, ainsi que la société chargée de leurs approvisionnements en bois, vont en effet être repris par la famille indonésienne Wijaya.</p> <p>Les deux usines de production de pâte à papier seront regroupées au sein d'une filiale, "Fibre excellence", elle-même rattachée à un holding de droit hollandais : Paper excellence BV. Géré par Jackson Wijaya, il est familier de l'industrie papetière. La famille Wijaya détient déjà le groupe "Asia pulp and paper", le n°3 mondial du secteur. Lui-même rattaché à un conglomérat : Sinar Mas.</p> <p>Pas de plan social</p> <p>Depuis 2008, Tembec doit faire face à des difficultés que la crise mondiale a amplifiées. Coté à la bourse de Toronto, le groupe papetier fondé en 1973 à Temiscaming (Québec), s'est mué en quelques années en un acteur de taille mondiale spécialisé dans la fabrication de pâtes à papiers. Parmi celles-ci, la pâte "kraft" qui permet d'obtenir du papier pour l'emballage, ou encore la presse.</p> <p>Les usines de Tarascon et de Saint-Gaudens en Haute-Garonne, sont spécialisées dans ce type de production à partir de bois de feuillus ou de résineux. Tembec possède également une troisième usine à Tartas, dans les Landes, mais qui n'est pas concernée car intervenant sur le créneau des pâtes dites "de spécialités", plus rémunératrices. Elle restera donc sous pavillon canadien.</p> <p>Recapitalisé fin 2008, le groupe a entrepris de se restructurer et de monter en gamme en se recentrant justement sur le créneau des spécialités où il est reconnu. Un choix annoncé en novembre dernier, à un moment marqué par des arrêts de production et des</p>	
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		<p>mesures de chômage partiel. L'opération de cession en cours représente <i>"environ une somme de 100 millions d'euros, répartie entre actions et prise en charge des dettes"</i>, explique un communiqué du groupe Tembec.</p> <p>Soumis aux comités d'entreprise des usines de Tarascon et de Saint-Gaudens, des avis favorables ont été rendus avant le week-end. <i>"Il fallait informer, il reste maintenant à finaliser les éléments techniques. C'est une affaire de semaines, commente Patrick Sombret, directeur de Tembec France. Il n'y aura pas de plan social, l'ensemble du personnel est repris. La première mission de Paper excellence sera de stabiliser l'existant après une année de coupes drastiques"</i>.</p> <p>Jean-Luc CROZEL (jlcrozel@laprovence-presse.fr)</p>	
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End of report

