



## Boyer Mill Due Diligence System

July 2024 – June 2025

### Background:

The Boyer Mill at New Norfolk produces newsprint, improved newsprint, book paper and light weight coated paper. Boyer currently source approximately 500,000 tonne of plantation grown *Pinus radiata* wood (in log form) per annum from within Tasmania. The majority of this volume is sourced from the Lenah Estate managed by SFM in Southern Tasmania and from Timberlands Pacific, operating in State Forest areas in Northern Tasmania. Both these suppliers are certified to FSC® and Responsible Wood certification schemes. Wood was also sourced from Forico which is also dual certified. Less than 0.5% of wood received in the past 12 months was uncertified and 10% was non-FSC certified wood. Kraft pulp is supplied from Oji Fibre Solutions in New Zealand, which is FSC® controlled wood.

### Supply Area:

During the past 12 months The Boyer Mill used *Pinus radiata* wood only from Tasmania and Kraft pulp from New Zealand. Controlled material has been supplied from the following non-FSC® suppliers in Tasmania:

- AKS Forest Solutions;
- Highland Forest Products;
- Reliance Forest Fibre;
- Independent private growers (small, low intensity managed forests).

Independent private growers generally have woodlots and windbreaks or small plantations on their farms and cannot carry the financial costs associated with forest certification.

In order for Boyer to ensure this FSC non-certified wood (defined as controlled material) is responsibly sourced and can subsequently be accepted and mixed with the certified wood to produce paper products, we implement a Due Diligence System (DDS). This system involves a review of the National Risk Assessment, Company Risk Assessment, audit verification and stakeholder consultation.

### Controlled Wood Risk Assessment:

FSC Australia has conducted a risk assessment to determine where high risks (or specified risk) occur (FSC National Risk Assessment “FSC-NRA-AU V2-0”). These risks applicable to Boyer’s wood supply are:

#### Low Risk:

- Controlled Wood category 1- Illegally harvested wood
- Controlled Wood category 2- Areas where traditional and civil rights are being violated
- Controlled Wood category 3.1, 3.2, 3.3 and 3.5 (HCV1, HCV2, HCV3 and HCV5)
- Controlled Wood category 5 – genetically modified material.

#### Specified Risk:

- Controlled Wood category 3.4 HCV4 – Critical Ecosystem Services (soil erosion, water catchments)
- Controlled Wood category 3.6 HCV6 – Cultural Values (indigenous and non-indigenous)
- Controlled Wood category 4 Conversion – Forests being converted to plantations for non-forest use.

For New Zealand there is a Controlled Wood National Risk Assessment in place (FSC Centralised National Risk assessment FSC-CNRA-NZV1.0). All categories have been assessed as Low Risk as the Kraft material is supplied by Oji Fibre Solutions as FSC Controlled Wood (SAI-CW-002173).

The specified risk noted above for Tasmania (categories 3.4, 3.6 and 4) require risk control measures to be implemented. These are described in the table below:



Table 1. Control measures in place for Category 3 – Wood from forests in which high conservation values are threatened by management activities and Category 4 – Wood from forests being converted to plantations or non-forest use. As per FSC-PRO-60-002A V1-0 FSC National Risk Assessment Framework

Indicator	Control Measures employed	Desired Outcome
3.4 HCV4	<p>Large suppliers are certified to the relevant FSC standard. Certificate check annually.</p> <p>Checks for HCVs undertaken – FPP and/or company risk assessment</p> <p>Prescriptions in place to protect any identified HCV4, or if HCV4 is likely in the area.</p> <p>Boyer to be advised of any complaints about the operation</p> <p>Stakeholders consulted</p>	<p>Large regular suppliers continue to maintain FSC certification verifying practices meet HCV Evaluation Framework requirements.</p> <p>All mandatory control measures applied.</p> <p>HCVs are protected.</p>
3.6 HCV6	<p>Cultural Heritage identified through FPP process or AHT search</p> <p>Prescriptions in place to protect HCV6 identified or likely in the area</p> <p>Stakeholders consulted</p>	<p>All mandatory control measures applied.</p> <p>HCVs are protected.</p> <p>Large regular suppliers continue to maintain FSC certification verifying practices meet HCV Evaluation Framework requirements.</p>
4.1 Conversion of native forests to plantations or non-forest use in the area under assessment is <0.02% or 5000 ha average net annual loss for the past 5 years (whichever is less) OR conversion is illegal at the national or regional level on private and public land	<p>Only plantation <i>P.radiata</i> is used at Boyer.</p> <p>The FPP and/or company risk assessment outlines the species and ensures no conversion is occurring.</p> <p>Checks conducted to confirm no native species wood is used at Boyer</p> <p>Log yard operators trained to detect native species</p>	<p>No timber is sourced from native or natural forests.</p> <p>No wood sourced from forests being converted to plantations.</p>

### Supply Chain Risk Assessment:

The Boyer Mill is required to assess the risk of non-eligible inputs entering the supply chain, during transport, storage or processing. Wood is delivered from the forest straight to Boyer. All processing takes place on site and all storage of chips and pulp occurs on site. Table 2 describes the risk assessed and mitigation measures to control the risk.

Table 2. The risk of mixing non-eligible material during supply, transport, processing and storage.

Part of Supply Chain	Measures to reduce risk	Assessed Risk	Additional Measures	Residual Risk
Supply	<p>Company risk assessment for each operation for non certified suppliers.</p> <p>Weighbridge dockets &amp; FPP confirm area of supply.</p>	Low	<p>Audits at weighbridge to confirm docket information. Dockets reconciled with suppliers documentation daily.</p> <p>Annual internal audits</p>	Low
Transport	<p>Loads delivered directly to Boyer, unique operation number for each harvest operation. Each truck has a unique silkey and each load a separate docket. Drivers are inducted annually to ensure they understand their responsibilities and site procedures.</p>	Low	<p>Audits confirm direct cart.</p> <p>Daily checks of log yard.</p> <p>Dockets checked daily.</p> <p>Annual internal audits</p>	Low



Processing	All processing on Boyer site. Only processing P.radiata plantation material.	Low	Daily checks of log yard Internal audits of processing.	Low
Storage	Storage of logs – access restricted. Storage of chips on site post processing- access to chip pile restricted.	Low	Daily checks of log yard Regular chip sampling	Low

### FSC Core Labour Requirements:

Boyer abides by the FSC Core Labour Requirements via a number of procedures and documents. These documents are available on request by emailing called [certification.boyer@boyercorporation.au](mailto:certification.boyer@boyercorporation.au)

### Stakeholder Consultation and summary of Stakeholder comments:

Boyer received no feedback during the 2024 Stakeholder consultation process on the presence of HCVs within the supply area or concerns relating to management activities of any of our suppliers or the adequacy of our DDS.

In 2024 Boyer contacted stakeholders as part of the annual consultation process.

For the consultation period October 2024- November 2024, the following comments were received:

- One stakeholder suggested that volumes of wood received from non-FSC suppliers could be included so that the risks could be better assessed. This has been updated under Background on page 1.
- One stakeholder gave positive feedback on the implantation of the DDS.
- Two landowners indicated that they were pleased with operations on their property.

As there was no negative feedback, Boyer concluded in 2024 that there were no stakeholder concerns associated with sourcing controlled wood from the supply area.

### Complaints:

For complaints regarding Boyer's DDS or Controlled Wood system, Boyer will:

- a) Acknowledge receipt of complaint
- b) Inform stakeholders of Boyer's complaint procedure and acknowledge receipt of the complaint with an initial response to the complainant within 2 weeks;
- c) Forward complaints related to risk designations in the relevant FSC risk assessment to the responsible body;
- d) Conduct a preliminary investigation to determine if evidence provided in the complaint is or is not substantial by assessing the evidence against the risk of using material from unacceptable sources;
- e) Communicate with the complainant aiming to solve the complaints that are assessed as substantial;
- f) Forward substantial complaints to the Certification Body and FSC Australia within 2 weeks with information on the actions to be taken to resolve the complaint as well as how a precautionary approach will be used;
- g) Employ a precautionary approach to the continuing supply of material from source under investigation while complaint is pending;
- h) Within 2 months of receipt, implement a process to verify a complaint assessed as substantial (field or desktop audit);
- i) If verified as substantial, determine corrective actions to be taken by the supplier and means to enforce its implementation by the supplier. If corrective action can not be determined and/or enforced, the relevant material and/or supplier shall be excluded by Boyer;
- j) Check that corrective actions have been undertaken by suppliers and are effective;
- k) Exclude the relevant material and supplier from Boyer's supply chain if no corrective action is taken;



- l) Inform the complainant, Certification Body and FSC Australia of the results and actions taken towards resolution of the complaint, maintaining copies of the relevant correspondence and;
- m) Record and file all complaints received and actions taken.

Following a verified complaint Boyer will review the Due Diligence System.

Complaints can be sent to [certification.boyer@boyercorporation.au](mailto:certification.boyer@boyercorporation.au) or phone Sandra Hetherington: 0362610221.

**Expert Engagement:**

Boyer uses recommended or mandatory control measures as outlined in the national risk assessments, which have been developed by a panel of experts. A number of stakeholders contacted as part of this process are experts in their field.

**Summary of Stakeholder Feedback:**

For the consultation period October 2025- November 2025, the following comments were received:

- The CFMEU is now the Timber, Furnishing & Textiles Union (TFTU).
- References to Norske Skog are now obsolete.
- Consideration should be given to the transport emissions associated with Boyer's fibre supply.
- FSC should be listed as FSC Australia in the Stakeholder list.
- Two stakeholders gave positive comments on Boyer's approach to sourcing controlled material, noting the DDS is aligned with the Tasmanian Forest Practices System and controls put in place protect HCVs 4 and 6.

As there was no negative feedback, Boyer has concluded that there were no stakeholder concerns associated with sourcing controlled material from the supply area.

**Conclusion:**

In response to the controlled wood risk assessment by FSC Australia, the Boyer Mill addresses a number of criteria. Based on the measures put in place directly by the Boyer Mill to mitigate the potential risks, and the lack of any issues arising from the previous consultation, Boyer has concluded that the material sourced from controlled sources can be sold with the FSC Controlled Wood claim.

Appendix 1. Stakeholders List

Local Tasmanian Councils	Parks and Wildlife	Derwent Estuary Program
Forest Practices Authority	Rail Track Riders	New Norfolk and Derwent Valley News
Dept of Primary Industries, Parks Water and the Environment	Tasmanian Forest Products Association	Tasmanian Forest & Forest Products Network
Australian Forest Products Association	Timber Furnishing & Textiles Union	Cultural Heritage Management Australia
Aboriginal Heritage Tasmania	Arbre	Forico
Timberlands Pacific	Lenah Estate New Forests	Sustainable Timbers Tasmania
Highland Forest Products	Reliance Forest Fibre	SFM Forest Products
AKS Forest Solutions	Tasmanian Greens	Liberal Party
Labor Party	MSD	Les Walkden Enterprises
BR & KM Muskett & Sons	Perotti Brothers	Hazell Brothers
CSIRO	University of Tasmania	Private Forests Tasmania
FSC Auditors	FSC Australia	Responsible Wood
Stakeholders impacted by Controlled Wood suppliers	Boyer Customers	