

Risk Assessment for FSC Controlled Wood FSC STD -40-005 (v3-1)

Company :	Norske Skog Golbey
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Forest certification schemes :	SAI – COC – 002875
Date of risk Assement :	Décember 2017
Date of approval by SIA :	
Country :	FRANCE
District :	Every french districts
Product :	Softwood logs and chips
Species :	Picea Albies – Pseudotsuga menziesii - Pinus
Certification Body :	SAI Global
Adress :	29, rue du Pont - 92200 Neuilly-sur-Seine
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PREAMBLE – NSG Organization

NS Golbey mill is part of Norske Skog Group, which is among the world leader in the publication paper industry (newsprint and magazine). The production capacity of Golbey mill is 600 000 tons of newsprint per year. Part of the raw material, wood, comes from re-use of forest by-products: sawmill chips and logs from thinning.

1. Corporate Social Responsibility :

Norske Skog has integrated the Corporate Social Responsibility in its strategy through 10 commitments each applied in concrete actions:

The workplace:

People are central to our performance. We thus focus on labor relations, working environment, health and safety and skills development.

The Environment:

We concentrate our efforts on reducing our carbon footprint and supporting the sustainable management of raw materials.

The Marketplace:

Our aim is to improve the overall performance of our site, especially by keeping our costs under control, so as to ensure the business is profitable and sustainable.

The Community:

We work to strengthen our influence in local economy and social life and to promote our approach with all our stakeholders, and more particularly our customers and suppliers.

2. Quality Management :

NSG has a certification in the following fields:

Environment: ISO 14 001

Organization: ISO 9 001

Energy management: ISO 50 001

3. Wood supply:

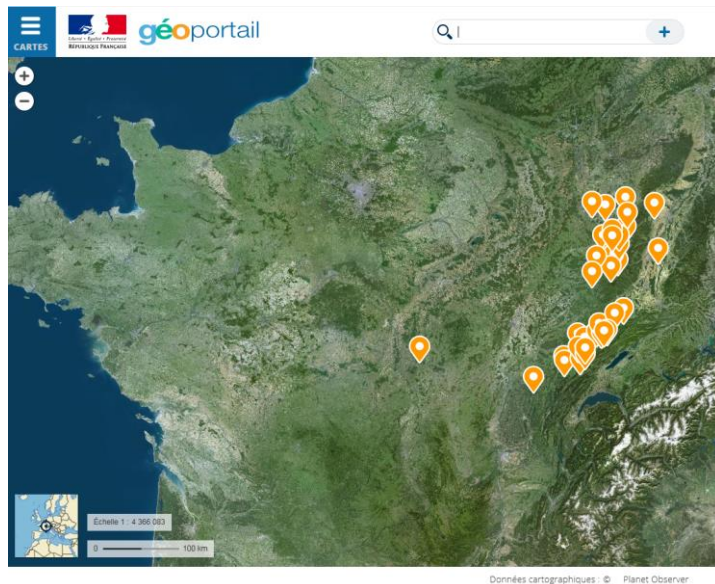
In 1999, the Norwegian Norske Skog Group, established a new papermill in Golbey, partly because of its **special location nearby the main softwood forest areas** : Massif des Vosges, Massif du Jura, German Black Forest.

Today, to control the logistic costs of these raw materials, the wood of French origin delivered to Golbey mainly come from the **Northeast quarter** of France. The **average supply chain** is 155 km for chips and 176 km for logs in 2016.

Administratively, our wood purchases are subject to the approval of NSG Environmental Policy and the **signature of EUTR declaration**.

a. Softwood chips

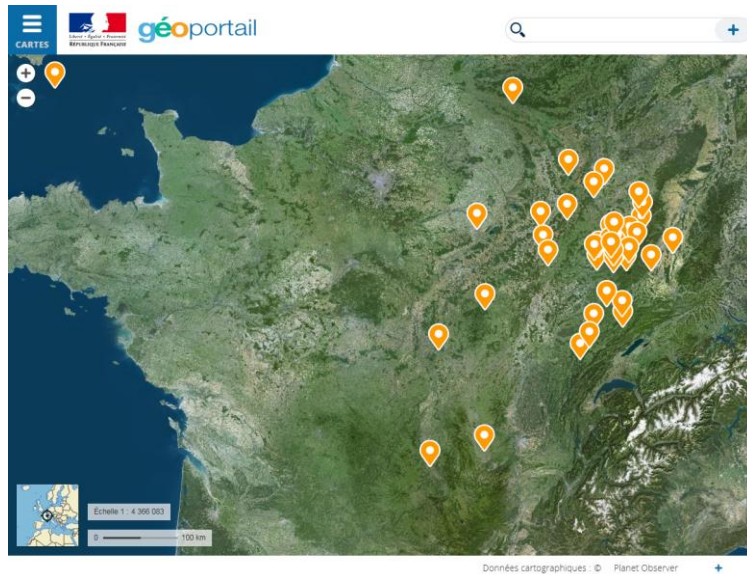
NSG chips supplies area in France :



As a result of the important part of logistics in the global cost of chips, **NSG has to restrict its wood supply area**. Then, except for few suppliers located closed to the Morvan forest and Massif Central area and the German Black Forest, the chips delivered to Golbey come from suppliers located in **Grand Est and Bourgogne – Franche Comté regions**.

b. Softwood logs

NSG logs supplies area in France :



The softwood logs of French origin delivered to NS Golbey mostly come from the French northeast regions. The Morvan and Auvergne forest areas only represent a slight part of the logs supply because of high logistic costs.

In Lorraine, 585 546 hectares over 850 000 ha (69%) are managed by the National State Forest Service (ONF) and approximately 50% in Franche Comté (Source: <http://www.onf.fr>).

From January 2017 to November 2017, 80 % of the logs and chips delivered to NS Golbey come from suppliers having a wood control network checked by independent organisms

SUMMARY OF RISK FOR THE DISTRICT

1. Illegally harvested wood	Low Risk
2. Wood harvested in violation of traditional and civil rights	Low Risk
3. Wood harvested in forests where high conservation values are threatened by management activities	Low Risk
4. Wood harvested in forests being converted to plantation or non-forest use	Low Risk
5. Wood from forests in which genetically modified trees are planted	Low Risk

Main Source for controlled wood categories 1, 2, 5 : FSC Centralized National Risk Assessment for France : FSC-CNRA-FRA (V1-0) EN

1. Illegally harvested wood

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.

1.1 Evidence of enforcement of logging related laws in the district

1.1 Justification	 <p>According to <i>Global Forestry.org</i>, France is considered as being low risk for the illegal logging aspects. (Legend :green = Low Risk) <i>Global Witness.org</i> do not mention any problem about illegal exploitation in France.</p>
1.1 Source	<p>http://www.globalforestryregistry.org/map - Category : Legality https://www.globalwitness.org/fr/</p>
1.1 Risk	<p>Low risk</p>

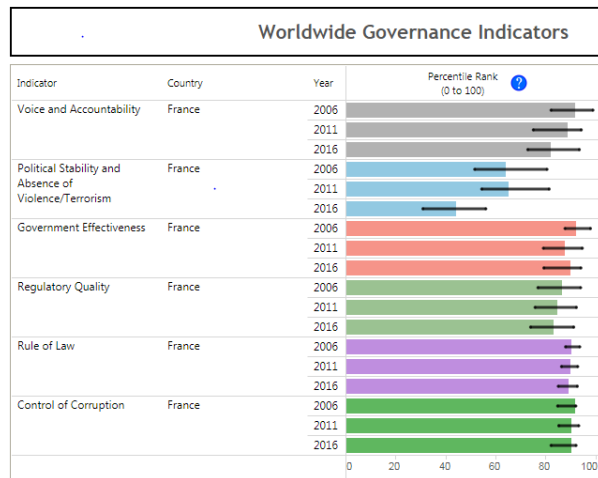
1.2 There is evidence in the district demonstrating the legality of harvests and wood purchases that includes robust and effective system for granting licenses and harvest permits.

1.2 Justification

As described, in *FSC Centralized National Risk Assessment for France Overview page 6*, in France, the main applicable legislation to forest operations and harvesting is the Forest Code updated on the 31st of March 2014. The Forest Code is implemented in conjunction with Environment Code, Labour Code, Rural Code and Taxation Code.

In terms of organization, publicly owned forest (which represent 25% of forest land) is managed by the National State Forest Service (ONF).

For the privately owned forest (75% of the forest land), Regional Forest Owners' Centers provide regional guidelines for management. Approval for the administration is required for all management documents as well as harvest permits and licences.



Source: [Kaufmann D., A. Kraay, and M. Mastruzzi \(2010\), The Worldwide Governance Indicators: Methodology and Analytical Issues](#)

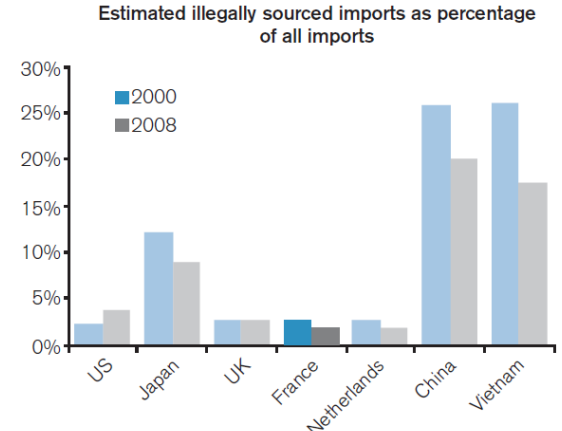
According to the *World Bank Governance Index 2015*, France has a high governance score of 1.41 in relation to “Rule of Law” (ranges from approximately -2.5 (weak) to 2.5 (strong) governance performance).

1.2 Source

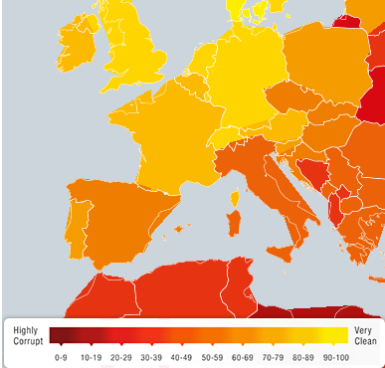
<https://ic.fsc.org/en/our-impact/program-areas/controlled-wood-01/controlled-wood-risk-assessments/fsc-risk-assessment-database>

	http://info.worldbank.org/governance/wgi/index.aspx#home https://www.legifrance.gouv.fr/affichSarde.do?reprise=true&page=1&idSarde=SARDOBJT000025265010&ordre=null&nature=null&g=ls http://agriculture.gouv.fr/le-reglement-sur-le-bois-de-lunion-europeenne http://info.worldbank.org/governance/wgi/index.aspx#home
1.2 Risk	Low risk

1.3 There is little or no evidence or reporting of illegal harvesting in the district of origin

1.3 Justification	<p>Estimated illegally sourced imports as percentage of all imports</p>  <table border="1"> <caption>Estimated illegally sourced imports as percentage of all imports</caption> <thead> <tr> <th>Country</th> <th>2000 (%)</th> <th>2008 (%)</th> </tr> </thead> <tbody> <tr> <td>US</td> <td>~2.5</td> <td>~4.0</td> </tr> <tr> <td>Japan</td> <td>~12.5</td> <td>~9.0</td> </tr> <tr> <td>UK</td> <td>~3.0</td> <td>~3.0</td> </tr> <tr> <td>France</td> <td>~3.0</td> <td>~2.0</td> </tr> <tr> <td>Netherlands</td> <td>~3.0</td> <td>~2.0</td> </tr> <tr> <td>China</td> <td>~26.0</td> <td>~20.0</td> </tr> <tr> <td>Vietnam</td> <td>~26.0</td> <td>~18.0</td> </tr> </tbody> </table> <p>France has been very engaged in efforts to tackle the trade in illegal timber. It has been amongst the more active of the EU member states in developing the EU Forest Law Enforcement, Governance and Trade (FLEGT) Action Plan, including the negotiation and implementation of the voluntary partnership agreements (VPAs). The government has also been promoting the production and consumption of sustainable timber (Chatham House, 2014). As an EU Member State, France is required to implement the EU Timber Regulation, which came into force in March 2013.</p> <p>Chathamhouse.org consider there is low risk in France as far as legality of harvest and wood purchases are concerned.</p> <p>None of the varieties purchased are in the list of endangered species according to CITES.</p>	Country	2000 (%)	2008 (%)	US	~2.5	~4.0	Japan	~12.5	~9.0	UK	~3.0	~3.0	France	~3.0	~2.0	Netherlands	~3.0	~2.0	China	~26.0	~20.0	Vietnam	~26.0	~18.0
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1.3 Risk	Low risk																								

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

1.4 Justification	 <p>According to <i>Transparency.org</i>, the Corruption Perceptions Index 2015 for France is 70.</p>
1.4 Source	<p>http://www.transparency.org/cpi2015 http://info.worldbank.org/governance/wgi/index.aspx#reports</p>
1.4 Risk	<p>Low risk</p>

2 Wood harvest in violation of traditional or civil rights

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.

2.1 There is no UN Security Council ban on timber exports from the country concerned

2.1 Justification	According to <i>FSC France</i> , no UN embargo toward France as far as wood exports are concerned.
2.1 Source	https://www.globalwitness.org/fr/ https://ic.fsc.org/en/our-impact/program-areas/controlled-wood-01/controlled-wood-risk-assessments/fsc-risk-assessment-database
2.1 Risk	Low risk


2.2 The country or district is not designated a source of conflict timber (e.g. USAID Type 1 conflict timber)

2.2 Justification	According to <i>FSC France</i> , France is not designated a source of conflict timber
2.2 Source	https://www.usaid.gov/gsearch/type1%20conflict%20timber https://ic.fsc.org/en/our-impact/program-areas/controlled-wood-01/controlled-wood-risk-assessments/fsc-risk-assessment-database
2.2 Risk	Low risk

2.3 There is no evidence of child labor or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the district concerned

2.3 Justification	According to <i>FSC France</i> , there is no evidence of child labor or violation of ILO labor rights in France. The french legislation relative to the labor rights is controlled by Labor Inspection Services (Inspection du Travail).
2.3 Source	http://www.ilo.org/ipecc/Regionsandcountries/europe-and-central-asia/lang--en/index.htm https://ic.fsc.org/en/our-impact/program-areas/controlled-wood-01/controlled-wood-risk-assessments/fsc-risk-assessment-database http://direccte.gouv.fr/
2.3 Risk	Low risk

2.4 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

2.4 Justification	 <p><i>Global Forestry.org</i> consider France as being low risk for the Traditional and Civil Rights aspects (Legend : green = Low risk)</p> <p>According to the <i>World Bank Governance Index 2015</i>, France has a high governance score of 1.41 in relation to “Rule of Law” (ranges from approximately -2.5 (weak) to 2.5 (strong) governance performance).</p>
2.4 Source	<p>http://www.globalforestregistry.org/map - Category : T&C Rights https://www.globalwitness.org/fr/ http://info.worldbank.org/governance/wgi/index.aspx#reports</p>
2.4 Risk	Low risk

2.5 There is no evidence of violation of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in the forest areas in the district concerned

2.5 Justification	<p>There are no tribal and indigenous people in the district. According to <i>FSC France</i>, there is no evidence that challenges the low risk designation.</p>
2.5 Source	<p>http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C169 https://ic.fsc.org/en/our-impact/program-areas/controlled-wood-01/controlled-wood-risk-assessments/fsc-risk-assessment-database</p>
2.5 Risk	Low risk




























3 Wood harvested from forest in which high conservation values are threatened by management activities

The district of origin may be considered low risk in relation to 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.

3.1 Forest management activities in the relevant level (eco-region, subeco-region, local) do not threaten eco-regionally significant high conservation values.

3.1 Justification	 <p><i>Global Forestry.org</i> consider France as being low risk for the High Conservation Value aspects (<i>Legend : green = Low risk</i>) The mediterranean region is however regarded as sensitive. For economical reasons as detailed in the préambule of this risk assessment, NSG french wood supply area is restricted to the northeast regions. Then, there is low risk of supplies of wood from the mediterranean region.</p>
3.1 Source	<p>http://www.globalforestryregistry.org/map http://www.developpement-durable.gouv.fr/-Natura-2000,2414-.html http://www.developpement-durable.gouv.fr/Les-objectifs-de-la-demarche.html http://www.intactforests.org/world.webmap.html</p>
3.1 Risk	Low risk

3.2A strong system of protection (effective protected areas and legislation) is in place that ensures survival of the HCVs in the ecoregion

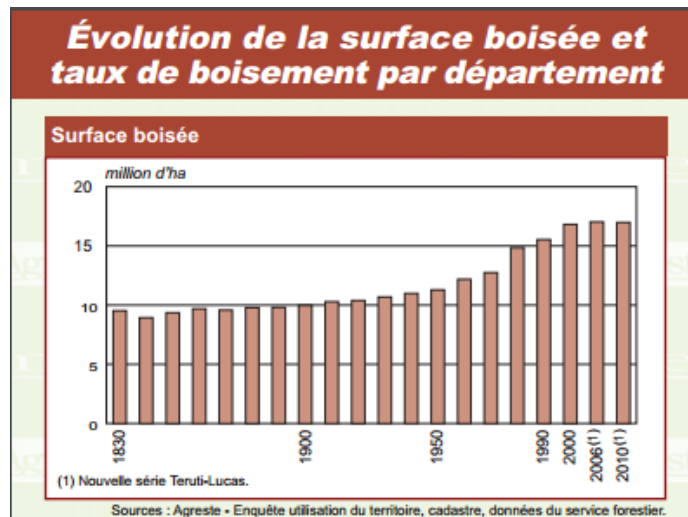
<p>3.2 Justification</p>	<p>According to <i>Protect Planet</i>, 4580 areas are protected in France (26% of land area).</p> <table border="0"> <tr> <td style="text-align: center;">National designations </td> <td style="text-align: center;">Regional designations </td> <td style="text-align: center;">International designations </td> </tr> <tr> <td style="text-align: center; font-size: 2em; color: green;">13</td> <td style="text-align: center; font-size: 2em; color: green;">4</td> <td style="text-align: center; font-size: 2em; color: green;">3</td> </tr> </table> <table border="0"> <thead> <tr> <th style="text-align: left;">Categories </th> <th style="text-align: right;">Count </th> <th style="text-align: left;">Categories </th> <th style="text-align: right;">Count </th> <th style="text-align: left;">Categories </th> <th style="text-align: right;">Count </th> </tr> </thead> <tbody> <tr> <td>National Nature Reserve</td> <td style="text-align: right;">150</td> <td>Marine Protected Area (OSPAR)</td> <td style="text-align: right;">39</td> <td>World Heritage Site</td> <td style="text-align: right;">2</td> </tr> <tr> <td>National Park - Core Area</td> <td style="text-align: right;">7</td> <td>Special Protection Area (Birds Directive)</td> <td style="text-align: right;">392</td> <td>UNESCO-MAB Biosphere Reserve</td> <td style="text-align: right;">8</td> </tr> <tr> <td>Regional Nature Reserve</td> <td style="text-align: right;">134</td> <td>Specially Protected Areas of Mediterranean Importance (Barcelona Convention)</td> <td style="text-align: right;">5</td> <td>Ramsar Site, Wetland of International Importance</td> <td style="text-align: right;">33</td> </tr> <tr> <td>National Park - Buffer zone/Area of adhesion</td> <td style="text-align: right;">7</td> <td>Site of Community Importance (Habitats Directive)</td> <td style="text-align: right;">1364</td> <td></td> <td></td> </tr> <tr> <td>Land acquired by a regional conservatory of natural areas</td> <td style="text-align: right;">780</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>National Hunting and Wildlife Reserve</td> <td style="text-align: right;">9</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Marine Nature Park</td> <td style="text-align: right;">4</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Land acquired by Conservatoire du Littoral (national seaside and lakeside conservancy)</td> <td style="text-align: right;">563</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Biotope Protection Order</td> <td style="text-align: right;">793</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Forest Biological Reserve</td> <td style="text-align: right;">233</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Regional Nature Park</td> <td style="text-align: right;">49</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>National Park - Integrale Reserve</td> <td style="text-align: right;">2</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Corsican Nature Reserve</td> <td style="text-align: right;">6</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>Moreover, the Natura 2000 network protects many nature areas in the European Union. It is made up of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated respectively under the Habitats Directive and Birds Directive.</p>	National designations 	Regional designations 	International designations 	13	4	3	Categories 	Count 	Categories 	Count 	Categories 	Count 	National Nature Reserve	150	Marine Protected Area (OSPAR)	39	World Heritage Site	2	National Park - Core Area	7	Special Protection Area (Birds Directive)	392	UNESCO-MAB Biosphere Reserve	8	Regional Nature Reserve	134	Specially Protected Areas of Mediterranean Importance (Barcelona Convention)	5	Ramsar Site, Wetland of International Importance	33	National Park - Buffer zone/Area of adhesion	7	Site of Community Importance (Habitats Directive)	1364			Land acquired by a regional conservatory of natural areas	780					National Hunting and Wildlife Reserve	9					Marine Nature Park	4					Land acquired by Conservatoire du Littoral (national seaside and lakeside conservancy)	563					Biotope Protection Order	793					Forest Biological Reserve	233					Regional Nature Park	49					National Park - Integrale Reserve	2					Corsican Nature Reserve	6				
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4 Wood harvested from areas being converted from forests and other wooded ecosystems to plantation or non-forest uses

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.

4.1 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.

4.1 Justification



The surface of the french forest reach around 16 million hectares in 2010. It has highly been increasing from the second half of the 19th century. In France, the wooded surface was estimated between 8,9 and 9,5 million hectare in 1830.

TABLE 3 (continued)
 Trends in extent of forest 1990–2010

Country/area	Forest area (1 000 ha)				Annual change rate					
	1990	2000	2005	2010	1990–2000		2000–2005		2005–2010	
					1 000 ha/yr	% ^a	1 000 ha/yr	% ^a	1 000 ha/yr	% ^a
France	14 537	15 353	15 714	15 954	82	0.55	72	0.47	48	0.30
Germany	10 741	11 076	11 076	11 076	34	0.31	0	0	0	0

According to the *FAO*, the annual rate of change for the french forest is 0.3% per year between 2005 and 2010.

The Caullet report of 2013 on the french forest reports an under-exploited french forest. During the last 25 years, the french forest rose from 13.8 millions hectares to 16.154 millions hectares. Annual increase of standing wood's volumes by 85 millions m³ for an annual mobilization at 58.5 million m³.

4.1 Source

<http://agreste.agriculture.gouv.fr/IMG/pdf/bois2012surfaces.pdf>
<http://www.fao.org/docrep/013/i1757e/i1757e.pdf>
<http://www.developpement-durable.gouv.fr/Le-rapport-de-Jean-Yves-Caullet.html>

4.1 Risk

Low risk

5 Wood from forests in which genetically modified trees are planted

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:

- a. There is no commercial use of genetically modified trees of the species concerned taking place in the country or district concerned
- b. Licenses are required for commercial use of genetically modified trees and there are no licenses for commercial use
- c. It is forbidden to use genetically modified trees commercially in the country concerned

5. Justification	According to <i>FSC France</i> , there is no commercial use of genetically modified trees. In France, utilization of genetically modified plants must receive authorization from the Ministry of Agriculture.
5. Source	https://ic.fsc.org/en/our-impact/program-areas/controlled-wood-01/controlled-wood-risk-assessments/fsc-risk-assessment-database http://www.ogm.gouv.fr/
5. Risk	Low risk