

Post-exercise examples Autumn 2017





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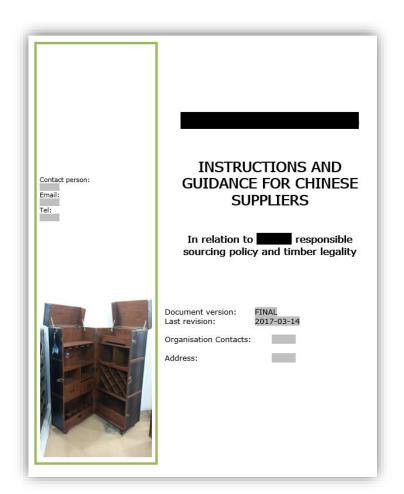
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Chinese plywood supply-chain





Plywood from China



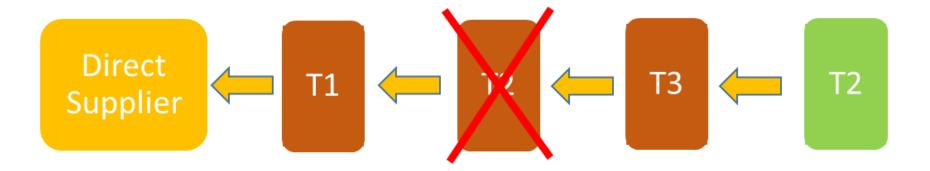
- 1. Complete DD-05 and DD-07
- 2. Address Problematic Elements within your Supply Chains
- 3. Implement and
 Maintain a System to
 ensure Minimum
 Information





2: Address Problematic Elements within your Supply Chains

"Please be aware that we have some minimum expectations with regards to information about our suppliers and supply chains...."



SUPPLY CHAIN ISSUE	EXPLANATION	REQUIRED ACTION
Broken Supply Chains	Suppliers must fully map their supply chains and record this information in the DD-07 Excel.	Gaps in your supply-chain map are unacceptable as they reduce our confidence in the origin and legality of the raw materials entering its products.
Complex Supply Chains	We strongly encourage suppliers to keep their supply chains as short and simple as possible.	On occasion, we may require suppliers to limit the number of sub-suppliers used to provide raw materials for its products.
Hardwood Species Ulmus spp., Fraxinus spp., Betula spp., Fraxinus spp., Quercus spp., Fagus spp	The Chinese State Forestry Administration (SFA) has stated its intention to phase-out all commercial logging in natural forests in China by 2017.	The risks of illegal harvesting and trade or of hardwood raw materials from NE China or Russia are high. If you cannot prove the origin and legality of this material, with a high level of confidence, you should cease to source this material.

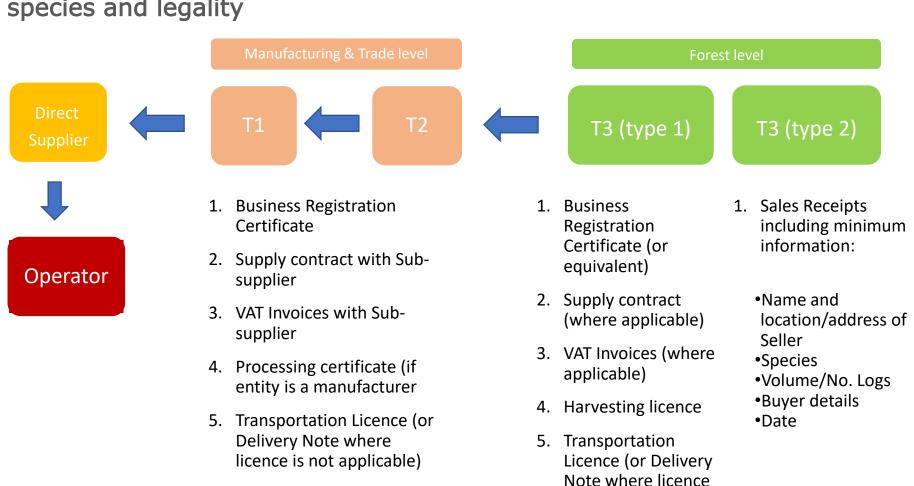
SUPPLY CHAIN ISSUE	EXPLANATION	REQUIRED ACTION
Spot Markets, Auctions and open- market purchasing	The problem of these types of markets is that the traceability of wood products is usually lost.	We do not accept that raw materials are sourced from such markets. These must be eliminated from our supply chains.
Non-Cooperative Sub- Suppliers	Situations may arise where sub-suppliers are not willing or able to collaborate with you to supply such information.	Non-cooperative sub- suppliers may result in our not being able to meet our legal obligations.



3: Supplier Minimal Information system

6. Goods-in reception log

Minimum information required to provide confidence about origin, species and legality



is not applicable)

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Chinese oak supply-chain





Mongolian Oak from China



Tier	Tier 0	Tier 1	Tier 2
Location	UK	Shanghai, China	North-East China
Certification	None	Unknown	Unknown
Species	(Oak) Quercus mongolica	(Oak) Quercus mongolica	(Oak) Quercus mongolica



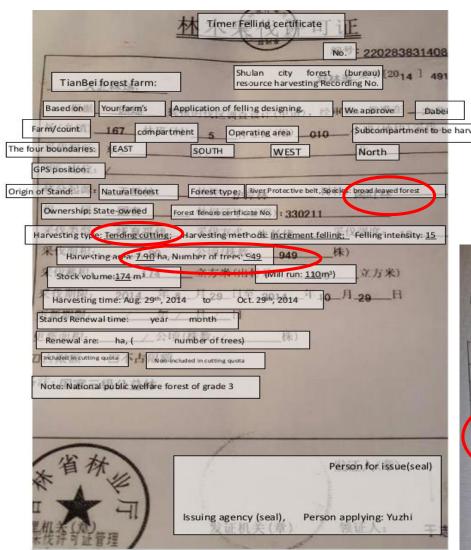


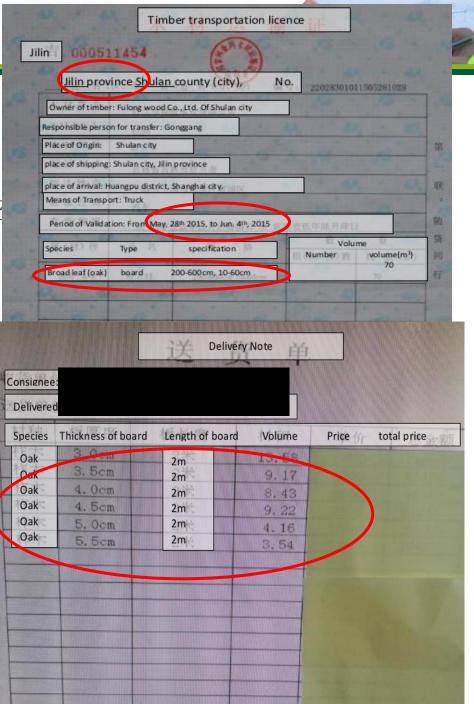
Mongolian Oak from China

Supplier provided:

- Invoices and delivery notes between some but not all tiers
- Harvest document for forest
- Certificate of Origin
- Volumes purchased and sold
- Customs documentation for export from China











Mongolian Oak from China

Risk Topic

- Access to information
- FLEGT license
- UN/ EU Sanctions
- CITES-listed species
- Certification
- Species Risk
- Origin Risk
- Trade & Transport risk
- Illegal transfer pricing
- Contamination and substitution risk

Risk key



N/A















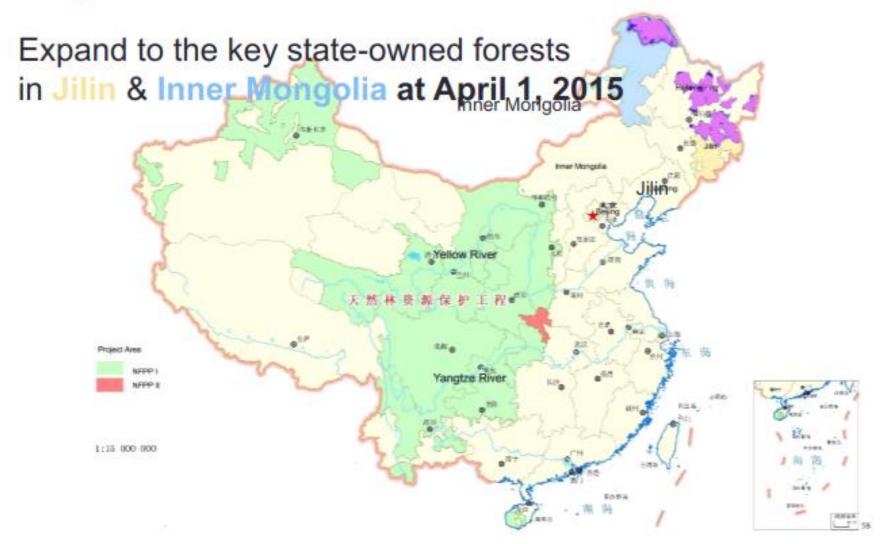
Access to Information

- Documentation does not adequately describes the supply chain.
- Documentation for all stages of supply chain not provided.
- Volumes and conversion factors are a concern.
- Document fraud and applicability is a concern in China





Expansion in 2015







Mongolian Oak from China

Risk Topic

- Access to information
- FLEGT license
- UN/ EU Sanctions
- CITES-listed species
- Certification
- Species Risk
- Origin Risk
- Trade & Transport risk
- Illegal transfer pricing
- Contamination and substitution risk

Risk key



N/A















Origin

- China CPI = 27
- Risk of mixing: NE China and Russia
- Logging ban in Jilin (effective 1st April 2015)
- Russian origin? Start again





Mongolian Oak from China

Risk Conclusion

Negligible Risk

Non-negligible Risk

X





Mongolian Oak from China

STEP 1 – **Postpone Sourcing**







Mongolian Oak from China

STEP 1 – Postpone Sourcing



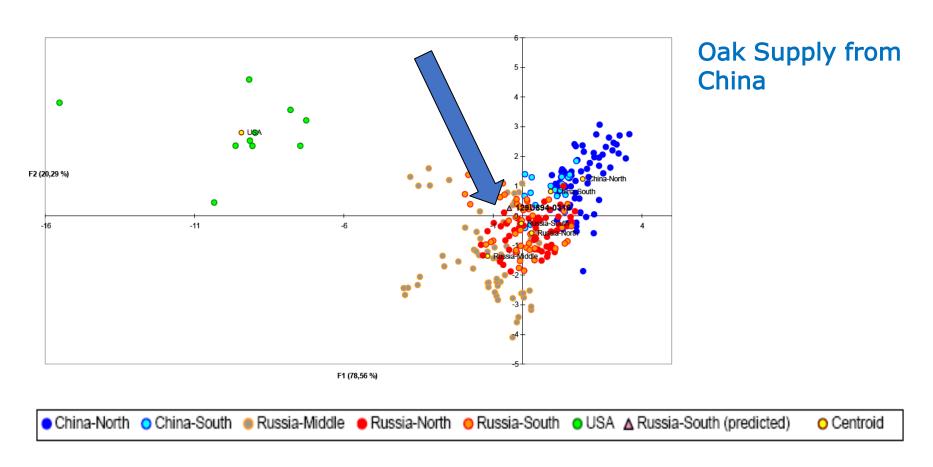
STEP 2 – Origin verification using laboratory testing







Mongolian Oak from China







Mongolian Oak from China

STEP 1 – Postpone Sourcing



STEP 2 – Origin verification using laboratory testing





STEP 3 - Collect additional documentation



STEP 4 – Supplier commits to using only N.American / European oak

- i. Generic CoC put in place
- ii. Supplier or third party auditing

STEP 5 – Ongoing programme of:

- i. Lab testing
- ii. Documentation checks

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Certification as a Risk Mitigation option



Risk Mitigation Options

Using Certified Material

Do these have any value?







How to assess whether a certification system meets EUTR requirements







Risk Mitigation Options

Using Certified Material

Certification Scheme Evaluation Checklist

- Organisations can use Certification Scheme Evaluation Checklist to conduct their own assessment
- NEPCon have also started to conduct evaluations of various certification and verification systems against





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