Compliance with the SBP Framework: Public Summary Report

Preferred by Nature OÜ
Evaluation of An Viet Binh Duong Company Limited

First Surveillance Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the CB Public Summary Report Template Version 2.1 and SBP Bridging Requirements for Meeting the Directive EU/2023/2413 (REDIII)

For further information on the SBP Framework and to view the full set of documentation see **www.sbp-cert.org**

Document history

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1 Overview

Certification Body (CB) Name:	Preferred by Nature OÜ
Primary CB contact for SBP:	Pilar Gorria Serrano
Primary CB contact email:	pgorria@preferredbynature.org
Audit team leader:	Van Cu Ho
Audit team members:	Liam Nguyen
Name of the Company:	An Viet Binh Duong Company Limited
Company legal address:	Lots A6-A7, N5 Street, Nam Tan Uyen Expanded Industrial Park, Binh Co Ward, 700000 Ho Chi Minh City, Viet Nam
Company contact for SBP:	Nguyen Dinh Long
Company contact email:	sinhkhoienergyltd@gmail.com
Company website:	
Date of installation:	
SBP Certificate Code:	SBP-13-69
Date of certificate issue:	02 Feb 2026
Date of certificate expiry:	01 Feb 2031
Audit closing meeting date:	27 Jul 2026
Audit cycle:	First Surveillance Audit

2 Audit conclusions

2.1 Certification decision

Based on the auditor's recommendation and the Certification Body's technical review, the following certification decision is taken:	
Certification decision:	Certification approved
Certification decision by (name of the person):	Liene Suveizda
Date of decision:	08 Sep 2026
Other comments:	Processing residues added to the scope. Product group WB 2.4 Other residues from wood processing added to the scope.

2.2 Open non-conformities and observations

2.2 Closed non-conformities

2.3 Actions taken by Organisation Prior to Report Finalisation

N/A

2.4 Notes for the next Audit

N/A

3 Scope of the audit and SBP certificate

Scope item	Check all that apply to the Certificate scope
Primary activity	Biomass Producer
Secondary activity	Trader
Approved Standards	SBP Standard 1: Feedstock Compliance v2.0; SBP Standard 2: Feedstock Verification v2.0; SBP Standard 4: Chain of Custody v2.0; SBP Standard 5: Collection and Communication of Data v2.0; Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413; Instruction Document Japan: Bridging Requirements for meeting Japanese sustainability, legality and GHG saving requirements v1.1 -; Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1
Product Group IDs	☒ Forest feedstock (1A) ☐ Trees outside forest (TOF) - Urban and landscape feedstock (2A) ☐ Trees outside forest (TOF) - Agricultural land feedstock (3A) ☒ Processing residues feedstock (4A) ☐ Post-consumer feedstock (5A) ☐ Other (please specify)
SBP Feedstock types	☒ SBP Compliant; ☒ SBP Controlled
Includes Supply Base Evaluation (SBE)	Yes
Includes EU RED Scheme	Yes
Includes EU RED Supply Base Evaluation (SBE)	Yes
Products	WB 1.1 Wood pellets
Feedstock origin (countries):	Viet Nam
SBP-endorsed Regional Risk Assessments used: **Public link:** https://sbp-cert.org/documents/standards-documents/risk-assessments/	SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
Chain of custody system	☐ Physical separation ☒ Mass balance
Outsourcing	No
Changes in the scope	Add processing residue feedstock to the scope. Add Product group WB 2.4 Other residues from wood processing.

3.1 Description of the company

Guidance: Please describe the type, structure and operations of the company including its role in the supply chain, its inputs and outputs as they related to SBP Standards.

An Viet Binh Duong Company Limited was established on January 3, 2020, specializing on wood pellet production and trading in Vietnam. The main office and the pellet plant are located in Nam Tan Uyen Industrial Park, Ho Chi Minh City, Vietnam. BP purchases roundwood from plantations in central provinces, Vietnam. Wood pellets can be sold from the gate and the Nha Be Buoy Port to different customers.

3.2 Site details

Legal entity name	Address	Site Activity	Visited during the audit
An Viet Binh Duong Company Limited	Nam Tan Uyen Industrial Park, Ho Chi Minh City, Vietnam.	Processing	☒

3.3 Detailed description of the Chain of Custody system and Product Groups

Guidance: Please describe the operation of the CoC system including details of the mass balance management and a list of established Product Groups.

BP purchases round logs from six provinces, Vietnam. The Chain of Custody system is based on the mass balance method with a 3-month balancing period. Feedstock have been defined: 10. and 40. The primary feedstock are sourced from smallholders under their SBE. The processing residue feedstocks are sourced from 1 sawmill which is FSC certified. All eligible inputs are mixed after the production gate, and mass balance is subsequently applied to allocate sustainability claims to outputs. The CoC system therefore relies exclusively on SBP requirements to ensure traceability and integrity of sustainability claims The BP intends to work with SBP-compliant biomass claims: 10 SBP-compliant. 40 SBP-compliant. The BP will have an additional account for SBP-controlled biomass claims if required: 10 SBP-controlled. 40 SBP-controlled. No downstream logistics are in scope, as the organization sells FOB at port facilities, operates strictly on a purchase-order basis, and maintains segregation throughout storage and dispatch. Although physical segregation is the primary control at the port, mass balance records are maintained in parallel to ensure full alignment with SBP traceability rules and consistent allocation of sustainability characteristics.

4 Specific objective of the audit

The specific objective of this evaluation was to confirm that the Biomass Producer's management system is capable of ensuring that all requirements of the specified SBP Standards Version 2.0, as well as the EU RED, ID Japan, are implemented across the entire scope of certification.
The scope of the evaluation covered:
- Review of the BP's management procedures;
- Review of CoC system critical control points;
- Interviews with responsible staff;
- Review of the records and calculations;
- Primary energy and carbon data collection evaluation.
- Review the Mass balance account
- Instruction Document Japan: Bridging Requirements for Meeting Japanese Sustainability, Legality, and GHG Saving Requirements
- Evaluate SBVs, RMMs (using SBP-RRA-AS-VN-FOR_v1.0-RRA-for-Vietnam-FOR_Interim)
- Level B under EU RED, where applicable.

5 Evaluation process

5.1 Timing and duration of evaluation activities

Audit Level of Effort (LoE)		
Activity	**Auditors**	**Auditor hours**
1. Preparation	Ho Van Cu, Liam Nguyen	8.0
2. On-site (excl. travel time)	Ho Van Cu	16.0
2. On-site (excl. travel time)	Liam Nguyen	8.0
3. Report writing	Liam Nguyen STD 4,5, 5E, ID JP	8.0
3. Report writing	Ho Van Cu STD 1, 2, EU	8.0

5.2 Auditor team qualification

Auditor qualification		
Auditor name	**Role**	**Qualification**
Cu Van Ho	Audit team member (STD 1,2 EU RED)	Cu started to work with Preferred by Nature in August 2019. He has over 30 years of experience in the forestry sector in Asia Pacific and has acted as an FSC FM/CoC auditor in many countries in the region, He holds a PhD in Forestry and – before joining Preferred by Nature – worked as a Lecturer at University of Agriculture and Forestry, Ho Chi Minh city, Vietnam
Liam Nguyen	Audit team leader (STD 4,5, ID 5E, ID JP)	Liam obtained the certifications in Tropical Forest Landscape Conservation & Restoration from Yale University, and in Wood Science from West Virginia University. With many years hands-on experience in the timber industry, he is qualified as an auditor for FSC FM, FSC CW, FSC CoC, PEFC, and SBP. Since joining Preferred by Nature in 2022, Liam has been actively planning and conducting a handful of audits in Vietnam and Southeast Asia.

5.3 Description of evaluation activities

The main activities took place on 16, 17 July and 27 July, focused on evaluating the management system, including division of responsibilities, record-keeping, classification of input materials (reception and registration), analysis of existing certification management systems and CoC critical control points, collection of energy and carbon data, and communication. During the opening meeting on 16 July, 2026, the auditor was introduced, the certification scope was clarified, and information on the audit plan, methodology, auditor qualifications, confidentiality issues, assessment methodology, and other applicable Preferred by Nature policies and procedures was provided. Later that day, during interviews and a review of documentation, all relevant requirements of the SBP and CoC standards were evaluated.

During the process, the overall responsible person for the SBP system and other responsible staff were interviewed. The pellet mill facilities were visited, and observations, as well as additional interviews and document verifications, were conducted. Desk work on business integrity and other aspects of SBP Standard 4 was also completed.

On-site evaluations: Half day 16 and full day 17 July, 2026, for primary feedstock suppliers: Based on the list of suppliers (including 467 suppliers) of primary feedstock (small forest owners), 12 of them were selected for on-site visits to assess compliance of feedstock with the supply base and declared characteristics. 1 processing residue supplier is visited to evaluate the EU RED processing residue conformance.
The closing meeting took place on 27 July, findings were summarized, and preliminary audit conclusions based on the use of the 3-angle evaluation method were provided to the Organization's management and the SBP responsible person.

A good performance was found, and a positive certification decision was concluded.

5.4 List of forest management units and feedstock suppliers visited

☐ N/A – No forest sites or suppliers visited during this evaluation

Site name
Hoang Thi Van
Site location
Thuong Ninh, Thanh Hoa
Site description
Acacia plantation
Rationale and focus of visit
Post harvesting, Acacia, Small Forest Owner
Description of audit activity
The onsite verification was to visually check the boundary in comparison to the land use right certification issued to the smallholder mentioned above; interviewed harvesters about OHAS, observed the harvesting practices, waste and water source located within the plantation areas. Tweves small forest owner are randomly selected from the list of suppliers (467 farmers) in six provinces across Vietnam indicated in the supply base report.

Site name
Cam Thi Tinh
Site location
Thuong Ninh, Thanh Hoa
Site description
Acacia plantation
Rationale and focus of visit
Check Boundary, OHAS, buffer zone, chemical usage, planted species

Description of audit activity
Origin confirmation and relevant documentation check to confirm legality. Interviews and observations to evaluate rotation crops procedures, uses of fertilizers, chemicals or pesticides, soil management measures, buffer zones, and site preparation

Site name
Vi Cong Toa
Site location
Thanh Quan, Thanh Hoa
Site description
Acacia plantation
Rationale and focus of visit
Check Boundary, OHAS, buffer zone, chemical usage, planted species
Description of audit activity
Origin confirmation and relevant documentation check to confirm legality. Interviews and observations to evaluate rotation crops procedures, uses of fertilizers, chemicals or pesticides, soil management measures, buffer zones, and site preparation

Site name
Lang Thi Ha
Site location
Thanh Quan, Thanh Hoa
Site description
Acacia plantation
Rationale and focus of visit
Check Boundary, OHAS, buffer zone, chemical usage, planted species
Description of audit activity
The onsite verification was to visually check the boundary in comparison to the land use right certification issued to the smallholder mentioned above; interviewed harvesters about OHAS, observed the harvesting practices, waste and water source located within the plantation areas. Tweves small forest owner are randomly selected from the list of suppliers (467 farmers) in six provinces across Vietnam indicated in the supply base report.

Site name
Dinh Thi Thuy
Site location
Tan Thanh, Quang Tri
Site description
Acacia plantation

Rationale and focus of visit
Check Boundary, OHAS, buffer zone, chemical usage, planted species
Description of audit activity
Origin confirmation and relevant documentation check to confirm legality. Interviews and observations to evaluate rotation crops procedures, uses of fertilizers, chemicals or pesticides, soil management measures, buffer zones, and site preparation

Site name
Tran Thi Bo
Site location
Anh Son Dong, Nghe An
Site description
Acacia plantation
Rationale and focus of visit
Check Boundary, OHAS, buffer zone, chemical usage, planted species
Description of audit activity
The onsite verification was to visually check the boundary in comparison to the land use right certification issued to the smallholder mentioned above; interviewed harvesters about OHAS, observed the harvesting practices, waste and water source located within the plantation areas. Tweves small forest owner are randomly selected from the list of suppliers (467 farmers) in six provinces across Vietnam indicated in the supply base report.

Site name
Vo Hoai Nam
Site location
Thanh Binh Tho, Nghe An
Site description
Acacia plantation
Rationale and focus of visit
Check Boundary, OHAS, buffer zone, chemical usage, planted species
Description of audit activity
The onsite verification was to visually check the boundary in comparison to the land use right certification issued to the smallholder mentioned above; interviewed harvesters about OHAS, observed the harvesting practices, waste and water source located within the plantation areas. Tweves small forest owner are randomly selected from the list of suppliers (467 farmers) in six provinces across Vietnam indicated in the supply base report.

Site name
Ha Thi Tung
Site location
Nghia Loc, Nghe An

Site description
Acacia plantation
Rationale and focus of visit
Check Boundary, OHAS, buffer zone, chemical usage, planted species
Description of audit activity
The onsite verification was to visually check the boundary in comparison to the land use right certification issued to the smallholder mentioned above; interviewed harvesters about OHAS, observed the harvesting practices, waste and water source located within the plantation areas. Tweves small forest owner are randomly selected from the list of suppliers (467 farmers) in six provinces across Vietnam indicated in the supply base report.

Site name
Tran Duy Ho
Site location
Anh Son Dong, Nghe An
Site description
Acacia plantation
Rationale and focus of visit
Check Boundary, OHAS, buffer zone, chemical usage, planted species
Description of audit activity
The onsite verification was to visually check the boundary in comparison to the land use right certification issued to the smallholder mentioned above; interviewed harvesters about OHAS, observed the harvesting practices, waste and water source located within the plantation areas. Tweves small forest owner are randomly selected from the list of suppliers (467 farmers) in six provinces across Vietnam indicated in the supply base report.

Site name
Truong Cong Linh
Site location
Ky Lac, Ha Tinh
Site description
Acacia plantation
Rationale and focus of visit
Check Boundary, OHAS, buffer zone, chemical usage, planted species
Description of audit activity
The onsite verification was to visually check the boundary in comparison to the land use right certification issued to the smallholder mentioned above; interviewed harvesters about OHAS, observed the harvesting practices, waste and water source located within the plantation areas. Tweves small forest owner are randomly selected from the list of suppliers (467 farmers) in six provinces across Vietnam indicated in the supply base report.

Site name

Nguyen Tan Anh
Site location
Que Son, Da Nang
Site description
Acacia plantation
Rationale and focus of visit
Check Boundary, OHAS, buffer zone, chemical usage, planted species
Description of audit activity
Origin confirmation and relevant documentation check to confirm legality. Interviews and observations to evaluate rotation crops procedures, uses of fertilizers, chemicals or pesticides, soil management measures, buffer zones, and site preparation

Site name
Kso Ho Pip
Site location
Song Hin, Dak Lak
Site description
Acacia plantation
Rationale and focus of visit
Check Boundary, OHAS, buffer zone, chemical usage, planted species
Description of audit activity
The onsite verification was to visually check the boundary in comparison to the land use right certification issued to the smallholder mentioned above; interviewed harvesters about OHAS, observed the harvesting practices, waste and water source located within the plantation areas. Tweves small forest owner are randomly selected from the list of suppliers (467 farmers) in six provinces across Vietnam indicated in the supply base report.

Site name
HOANG THONG ONE MEMBER LIMITED LIABILITY COMPANY
Site location
No. 13, Street 5, Thong Nhat 1 Quarter, Di An Ward, Ho Chi Minh City, Vietnam Site description
Site description
Sawmill
Rationale and focus of visit
visual inspection, documentation, interviews; Verify processing residue
Description of audit activity
Evaluate the production process and to determine the feedstock matches the declared types. During the supplier audit the facilities were visited and responsible staff was interviewed to evaluate the production process and to determine the feedstock matches the declared types. It was observed that the feedstock is stored separately at the supplier wood yards. Additionally, sample records of deliveries were verified to identify the possible supply base and to confirm it is

within the declared ones.

5.5 Describe audit sampling methodology used

During the surveillance preparation and on-site work, sampling was implemented based on the following criteria: - full review of procedures; - full review of training records; - sample review of information related to suppliers; - review of SAR, SBR, Master datasheet, and invoices; - interviews with staff to evaluate theoretical and practical experience in implementation; - review of the SBR, RA, SBVs, RMMs, and samples focused on specified risks and management system implementation issues. The formula applied was 0.6 * square root of 467 = 13 (FMUs). In addition, FMUs were selected for logistics and to ensure a representative sample; the auditor selected 12 FMUs, representing 467 different smallholders, for visits to evaluate traceability. The risks identified for the provinces within Vietnam are homogeneity. CH: total suppliers 467 farmers Sampling: 0.6 SQR 467 =13. The auditors and CH discussed during the scoping stage and opening meeting, as the surveillance audit was taken place sooner to expand the scope for processing residue feedstocks; Vietnam forest plantations are homogeneous in specified risk across the country level, thus we agreed to conduct the onsite visit to 12 FMUs in six provinces and 1 processing residue supplier, this new scope is the focus of the surveillance. Number of FMUs was reduced to 12 after considering the LoE with long audit without providing additional assurance. Regarding the processing residue feedstocks, BP sourced from 1 FSC certified sawmill. The origin of the processing feedstock is confirmed within BP SBE. The auditor visited the sawmill to evaluate the chain of custody and BP's supplier audit program procedure.

5.6 CB stakeholder engagement

☒ N/A – Certification Body stakeholder consultation not applicable for this evaluation

Guidance: Please specify the number and types of stakeholders engaged, method of engagement and its outcomes.

5.7 Stakeholder feedback and response

☐ N/A – Certification Body stakeholder consultation not applicable for this evaluation

The auditor conducted consultations with local authorities and forest rangers through direct interviews during on-site evaluation. The results of the interviews showed that:
- 100% of households in the area were granted land use right certificates (LURC)
- The land area was planned and used for production forest plantations
- There was no conversion from natural forest to plantation forest after 1/2008
- Forest fires occurred on a small scale and were promptly handled
- There were no serious erosion or landslides recorded in the area.

5.8 Main strengths and weaknesses of the management system and operations

Strengths:

- Previous experience with PEFC COC, FSC COC, GGL
- Limited Supply Base and two types of feedstocks (1A and 4A)
- Small number of management staff and clearly designated procedures
- Robust recordkeeping system, ensuring transparency

Weaknesses:
N/A

5.9 Summary of evaluation activities for robustness of the Supply Base Evaluation

☐ N/A – Standard 1 not in the scope of the evaluation

- BP's SBE is based on SBP-RRA-AS-VN-FOR_v1.0-RRA-for-Vietnam-FOR_Interim.
- The risk assessment concluded with 15 specified risk indicators for small forest owners; BP referred to SBVs and established adequate RMMs for each indicator to reduce risk to a low level.
- Applicable Vietnamese laws were referred to, such as Forestry Law No. 16/2017/QH14, Land Law No. 31/2024/QH15, Labor Code No. 45/2019/QH14, Decree 156/2018/ND-CP, Circular 13/2023/TT-BNNPTNT, etc.
- Stakeholders were identified for the relevant specified risk indicators within BP's SEP

5.10 Summary of evaluation activities for Processing residues and/or Post-consumer feedstock requirements per Standard 2 and EU RED

Clear documentation of: Origin of residues; Processing steps, and Mass balance tracking through the supply chain.

5.11 Summary of evaluation activities for chain of custody system per Standard 4

BP implemented a mass balance module in which input feedstock data and output biomass are tracked and equivalent. Positive balances are carried over to the next reporting period.

The COC system utilizes the FSC COC module, in which CCP is controlled from the weighbridge point to biomass storage. Signboards are in place for identification

Clear procedures covering requirements version 2.0 in the SBP handbook, training records, internal records, purchase and sale invoices are kept and matched with the annual volume summary, business integrity is documented, RED commitment is signed by Senior management, and no subcontracting activity.

SEP is established and implemented.

5.12 Summary of evaluation activities for collection and communication of data per Standard 5

The Organization compiles data on energy use, feedstock, and transport through contributions from different departments, which are consolidated and summarized in the SAR by the responsible persons. Most values are based on actual data. In addition, certain average values were derived from sample measurements. The estimations and averages were supported by documented justification and aligned with operational records. The data set was found to be consistent and adequate to ensure reliable reporting in accordance with ID 5E.

5.13 Summary of audit findings for competency of involved personnel

Key personnel responsible for implementing and maintaining the Company’s SBP management and control systems demonstrated appropriate competence and task-specific knowledge of SBP requirements. Roles and responsibilities are clearly defined within the management system, and the implementation of control measures related to supplier approval, transportation monitoring, feedstock receipt, and production and storage activities was found to be effective and consistently applied.
Personnel assigned to perform the SBE demonstrated adequate competence and knowledge of applicable SBP requirements. Their experience includes conducting supplier evaluations, applying the DDS, responding to conformity-related inquiries, and maintaining alignment with current SBP Standards and guidance. Evidence reviewed confirmed that the SBE activities were performed consistently and in accordance with established procedures.

5.14 Summary of audit findings for GHG methodology per Standard 6 (if applicable)

☒ N/A – Standard 6 not in the scope

6 Detailed evaluation of BP's Supply Base Evaluation (if applicable)

☐ N/A – Supply Base Evaluation not in the scope of the evaluation

6.1 Overview of BP's risk assessments and mitigation measures including EU RED scope

BP's SBE is based on SBP-RRA-AS-VN-FOR_v1.0-RRA-for-Vietnam-FOR_Interim. The risk assessment concluded with 15 specified risk indicators for small forest owners, whilst 2 indicators are for Rubber trees which are not applicable to BP.
BP referred to SBVs and established adequate RMMs for each indicator to reduce risk to a low level. BP's supply base is located in six central provinces.
At the surveillance only small forest owners were used as per the company stakeholder list and 1 private organization.

Applicable Vietnamese laws were referred to, such as Forestry Law No. 16/2017/QH14, Land Law No. 31/2024/QH15, Labor Code No. 45/2019/QH14, Decree 156/2018/ND-CP, Circular 13/2023/TT-BNNPTNT, etc.

Stakeholders were identified for the relevant specified risk indicator within BP's SEP.

For the indicator related to maintenance of soil quality and biodiversity, the Organization implemented the risk assessment and risk mitigation on a forest sourcing area level (Level B).

Benchmarked scheme (FSC Forest Management Certificate) is used as part of the Risk Mitigation Measures within the STD 1 according to the table below. Additional mitigation measures for 2.2.1 are also implemented.

In cases, the forest is not certified with FSC Forest Management Certificate, full Risk Mitigation Measure is applicable. as described in section 6.2

6.2 CB evaluation of specified risk indicators and mitigation measures

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
1.1.1 Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Specified risk description
Vietnam has adequate legal regulations covering all supply base and biomass production activities. However, the implementation of legal for some aspects is still inadequate (based on the analysis in the relevant indicator), so this indicator is considered a risk identified for all 03 sub-scopes. Specific risks are detailed in the following indicators.
Detailed description of a mitigation measure
Valid FSC FM Certificate OR

Certificate of land use rights or commitment to no land dispute with correct name on ID of forest owner;
GSP coordinates of the forest plot; The list of forest products is prepared by the forest owner or by an organization/individual authorized by the forest owner; Forest product extraction plan is prepared by the forest owner or an organization/individual authorized by the forest owner; Slip at factory gate; Consulting with stakeholders on land boundary disputes.

Detailed description of CB evaluation of mitigation measure and its conclusions

1. The auditor analysed a sample of entries received in the reporting period from primary feedstock, including Packing list (bang ke lam san in Vietnamese), purchase documents, delivery notes, invoices, and origin information, in compliance with all existing applicable laws and regulations.
2. Field visits were conducted to verify on-site
3. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
1.1.2 Legal ownership of land and resource use rights shall be respected.
Specified risk description
The supply of timber raw materials in Vietnam is mainly from production forests, of which the majority of production forests have been allocated to households for management. However, with a large number of small forest owners, the issuance of land use right certificates has yet to be fully implemented, so this indicator is considered a definite risk for small forest owners.
Detailed description of a mitigation measure
Valid FSC FM Certificate OR Red book or Document of the Commune People's Committee on land without dispute, with the same name as in forest owner's ID.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. The Auditor analysed a sample of entries received in the reporting period from primary feedstock included Packing list (bang ke lam san in Vietnamese) purchase documents, delivery notes invoices, origin information in comply with all existing applicable laws and regulations, copy of Land Use Rights Certificated (LURC) of suppliers (small forest owner) 2. Field visits were conducted to verify onsite and consultation with local authority and forest protection dept (FPD) 3. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
1.1.3 Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Specified risk description
The primary feedstock in Vietnam is mainly sourced from planted production forests. The main species used for forest plantations include Acacia, Eucalyptus and Rubber, which are in the list of major forestry species (Circular 22/2021/TT-BNNPTNT dated 29/09/2021) and not listed under CITES. Harvesting permits are required for state-owned forest owners but not for households and individuals, while forest product inventory is mandatory for all forest owners. In practice, stateowned organizations fully comply with the requirements for approving harvesting plans and forest product inventory. Smallholders mainly sell standing trees to intermediaries or traders. Therefore, filling in the forest product inventory is delegated or assigned to intermediaries or traders. Intermediaries or traders are not allowed to fill in the forest product inventory, which does not comply with current laws (Circular 26/2025/TT-BNNPTNT). In addition, the implementation and control of forest inventory for private forest owners has yet to be fully implemented. Therefore, specific risks are identified for feedstock originating from small forest owners and private organizations related to the requirement of forest inventory.
Detailed description of a mitigation measure
FSC FM Certificate OR The list of forest products is prepared by the forest owner or by an organization/individual authorized by the forest owner; Forest product extraction plan is prepared by the forest owner or an organization/individual authorized by the forest owner; Slip at factory gate; Consulting with stakeholders on land boundary disputes; Procurement of tree species not from CITES list.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. Field visits were conducted to verify onsite and consultation with local authority and forest protection dept (FPD) to confirm that the BP legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements 2. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
2.2.1 Feedstock shall not be sourced from land that had one of the following statuses in January 2008 and no longer has that status due to land conversion: a. Forests b. Wetlands c. Peatlands d.

Highly biodiverse grasslands.
Specified risk description
Although Vietnam has adequate legal regulations and effective mechanisms for managing forest and wetland land use, from 2006 to 2014, the conversion of depleted natural forests into plantation forests took place on a large scale legally. There are still sporadic illegal forest conversions to date. The loss of mangrove forests and peatlands has also occurred significantly. Therefore, this indicator is assessed as a specified risk.
Detailed description of a mitigation measure
- Check if a land use right certificate was issued before 2008? In this case, check the land use purpose; Certificate of land use rights or commitment of no land dispute; - Forest cover map.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. No GIS database is available, but during the interview with the local authority, they confirmed that the area has been allocated for plantation since 2000, no land dispute; therefore mitigation is accepted 2. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced
Specified risk description
Although Vietnam has regulations to limit the negative impacts of forestry production activities, implementing sustainable forest management plans is optional for all forest owners. The short forest planting rotation and the widespread burning of vegetation can negatively impact soil quality. Therefore, this indicator is assessed as a specified risk
Detailed description of a mitigation measure
FSC FM Certification; OR Field survey of soil quality and analysis of how harvesting will affect soil quality. Before harvesting: assess the slope and organize harvesting techniques to prevent soil degradation. After harvesting: control vegetation, burning of harvesting residues can be done only in compliance with best forest management practices, do not dig out the stump after harvesting; Stakeholder consultation on soil quality issues; Yearly training for forest owners and harvesting teams to apply the best forest management practices, burn residues in accordance with best forest management practices, do not remove the stump after harvesting.
Detailed description of CB evaluation of mitigation measure and its conclusions

1. Based on on-site visits and consultation with the local authority and forest protection dept (FPD) and direct interview with farmers about soil quality management, the auditor has been advised that the farmer apply the technique of maintenance and actively enhance soil quality by:
- Implement conservation tillage and cover cropping
- Use integrated nutrient management (organic + inorganic)
- Avoid practices that lead to erosion.

2. This method is described in local government guidelines and has been trained for households in Da Nang. At the time of assessment, no negative impacts were found in the identified supply base.

3. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
2.2.4 Where the removal of harvest forest residues and/or stumps occurs, this shall not lead to irreversible negative impacts to the ecosystem.
Specified risk description
Although Vietnam has a Forestry Law regulating permitted or prohibited forestry activities and regulations on sustainable forest management, there are no effective legal regulations specifically for the treatment of post-harvest residues and the situation of uncontrolled burning of vegetation after harvesting is still ordinary, so this index is assessed as a definite risk.
Detailed description of a mitigation measure
FSC FM Certificate OR Field survey: burning of harvesting residues can be done only in compliance with best forest management practices, no digging of stumps after exploitation; Training for forest owners and harvesting teams to apply the best forest management practices when logging, managing harvesting residues and not digging out stumps after logging; Stakeholder Consultation with no dispute on the soil quality matter.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. By conducting on-site visits and consultation with local authority and forest protection dept (FPD) and direct interview farmer about negative impacts to the ecosystem, the auditor has been advised that the farmer applied technic of maintenance and actively enhance soil quality by: - Implement conservation tillage and cover cropping - Use integrated nutrient management (organic + inorganic)

- Avoid practices that lead to erosion.
2. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Specified risk description
Vietnam has complete regulations to protect water resources in general and the forestry sector. In general, forestry activities have little impact on water resources. However, afforestation encroaching into protected areas along stream buffer zone is still quite common in forests managed by smallholders. Therefore, this indicator is considered a specified risk for smallholder.
Detailed description of a mitigation measure
FSC FM Certification OR Field survey. Before harvesting: check for the presence of streams and rivers. After harvesting: check for remaining unharvested buffer zones of correct size; consult with stakeholders on whether the quality and quantity of groundwater, surface water, and downstream water in the area are being maintained and improved.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. By conducting on-site visits and consultation with the local authority and forest protection dept (FPD) and direct interview with the farmer about the water quality and quantity of groundwater, surface water and water downstream shall be maintained or enhanced, the auditor recognized: 2. The forest owner understands and follows the water resources management guidelines provided by local authorities. 3. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator

2.2.7 Pesticides shall only be used as part of an Integrated Pest Management (IPM) plan in compliance with national legislation, chemical safety data sheets and industry best practice. Banned pesticides shall not be used.
Specified risk description
The use of pesticides in Vietnam's production forests has been fully regulated. However, excessive use of pesticides still occurs in rubber plantations. Therefore, this indicator is considered as specified risk for rubber plantation only for all sub-scopes of forest owner.
Detailed description of a mitigation measure
N/A as only Acacia species are procured.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. The auditor reviews the purchasing document and interviews farmers and plantation owners to confirm that no rubber trees are in the supply chain 2. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
2.2.8 Waste shall be disposed of in an environmentally appropriate manner.
Specified risk description
Waste management has been legally regulated, but the collection and treatment of waste from rubber forest management activities has yet to be effectively implemented, so this indicator is considered a specified risk for rubber forests.
Detailed description of a mitigation measure
N/A as only Acacia spp. are procured.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. The auditor reviews the purchasing document and interviews farmers and plantation owners to confirm that no rubber trees are in the supply chain. 2. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
2.2.11 The impacts of natural processes such as fires, pests and diseases shall be managed.

Specified risk description
Forest fire management has completed legal regulations and implementation mechanisms, but smallholders do not fully implement these regulations due to limitations in awareness, knowledge and techniques. Regarding pest management, although there are regulations and technical procedures, all forest owners yet to have not effectively implemented them.
Detailed description of a mitigation measure
FSC FM Certification OR Forest fire prevention and fighting plan developed by forest owner; Field survey: Implementing fire prevention and fighting technical guidelines; Training for forest owners and logging teams: 1) How to identify and prevent forest pests and diseases, 2) How to identify and treat leaf wilt disease of Acacia hybrid and Acacia mangium
Detailed description of CB evaluation of mitigation measure and its conclusions
1. On-site visit and stakeholder consultation with local communities and authorities to confirm that fires, pests, and diseases at plantations are well managed by the small forest owners with strong final support from the local authority and BP. 2. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
4.1.8 Training shall be provided for all workers to allow them to implement the conditions set out in all elements of the SBP Standards relevant to their responsibilities.
Specified risk description
Vietnamese law has policies and regulations on vocational training and education for small and mediumsized enterprises in all production sectors. Training facilities in the forestry sector are provided for university-level workers and workers nationwide. However, training and technical and occupational safety guidance for enterprise workers has yet to be fully implemented. For small forest owners, production activities are mainly based on practical experience without training. Therefore, this indicator is assessed as a specified risk.
Detailed description of a mitigation measure
Train smallholders and logging groups on all high risks identified in the Vietnam RRA and addressed in this Risk Management Plan.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. The auditor reviews training records at the central office of CH and on-site at the plantation sites, and interviews with workers to confirm that the relevant staff have provided adequate training on SBP standards 2. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
4.1.10 Safeguards shall be put in place to protect the health and safety of workers by developing, communicating and implementing policies and procedures.
Specified risk description
Vietnam has specific legal regulations on implementing protective measures that must be applied to protect the health and safety of workers. Statistics from the Ministry of Labor, War Invalids and Social Affairs also show that the number of occupational accidents in the forestry industry has been insignificant in the last three years. However, there has been no comprehensive assessment of the implementation of occupational safety and hygiene regulations in forestry, so this indicator is assessed as a specified risk for all subscopes.
Detailed description of a mitigation measure
FSC FM Certificate OR - Training for forest owners and logging teams on health and safety regulations during logging; - Provide security equipment Personal protective equipment (PPE) for logging teams even though they are hired by forest owners; - Stakeholder Consultation with no dispute on health and safety matter
Detailed description of CB evaluation of mitigation measure and its conclusions
Based on document review, consultation with stakeholders, and an on-site visit, the auditor finds that BP's mitigation measures are adequate and effective in managing the specified risks associated with this indicator.

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
4.2.4 Legal, customary, and traditional tenure and use rights of Indigenous Peoples and local communities related to the Supply Base shall be identified, documented, and respected.
Specified risk description
Regarding traditional customary ownership, the State always has a preferential policy for local communities and ethnic minorities in granting forest land use rights. The legal use rights according to traditional customs of local communities are also protected by the provisions of the Forestry Law and Circular 28/2018/TTBNNPTNT, Circular 13/2023/TT-BNNPTNT on sustainable forest management. Still, the identification of forests with significance in customs, practices and beliefs has only been well implemented by forest owners who are state organizations. For forest owners who are private organizations or small forest owners, the identification of forests with significance in

customs, practices, and beliefs has yet to be fully implemented or has only stopped at the identification stage without solutions to ensure respect for traditional use rights. Thus, this indicator is assessed as low risk for state organizations and specified risk for private organizations and small forest owners.

Detailed description of a mitigation measure

FSC FM Certificate
OR
- Certificate of land use rights or commitment to no land dispute with correct name on ID of forest owner;
- Consult the Commune People's Committee and local Forest Rangers on management, supervision and ensuring the implementation of traditional ownership and use rights of local communities;
- Consult with representatives of ethnic minorities.

Detailed description of CB evaluation of mitigation measure and its conclusions

1. The auditor interviews with farmers and local people on-site at the plantation camp, as well as local authorities, to confirm that no negative impacts occurred.
2. Mitigation found sufficient to ensure that the feedstock is received as low risk

Country

Viet Nam

Area/Sub-Scope

Small forest owners in Central Vietnam

Indicator

4.2.5 Mechanisms shall be in place for resolving grievances and disputes relating to tenure and use rights of the forest and other land management practices.

Specified risk description

Although Vietnam has regulations related to the mechanism for resolving complaints and disputes over forest ownership and use rights, implementing those regulations and mechanisms is still inadequate and ineffective, so this indicator is considered a specified risk for all sub-scope groups.

Detailed description of a mitigation measure

FSC FM Certificate
OR
- Certificate of land use rights or commitment to no land dispute with correct name on ID of forest owner;
- Stakeholder Consultation with no dispute on tenure and use rights and other forest management practices.

Detailed description of CB evaluation of mitigation measure and its conclusions

1. The auditor interviews with farmers, local people on-site at the plantation sites, as well as local authorities, to confirm that 100% of farmers in the region have granted LURC.
2. Mitigation found sufficient to ensure that the feedstock is received as low risk.

Country
Viet Nam
Area/Sub-Scope
Small forest owners in Central Vietnam
Indicator
4.2.6 Where Indigenous Peoples' rights are identified in the Supply Base, and Free Prior and Informed Consent (FPIC) has not been achieved for the proposed and planned activities, a consultation and, if required, accommodation process shall be put in place.
Specified risk description
Community and stakeholder consultations on forestry plans and planning have been carried out at the national level. However, at the implementation level, community and stakeholder consultations on forest management plans and exploitation plans of forest owners have only been thoughtfully implemented by forest owners who are state organizations. Forest owners who are private organizations and small forest owners often do not fully consult with the community when implementing sustainable forest management plans and do not notify the exploitation plan and forest product inventory to the Forest Protection Department. Therefore, this indicator is considered a defined risk for forest owners who are private organizations and small forest owners.
Detailed description of a mitigation measure
FSC FM Certificate; OR List of local ethnic minorities, consult with stakeholders with all identified ethnic minorities in the Supply Base without conflict or discrimination; Investigate public information on ethnic minority rights, traditional forest use, and conflicts with forest owners in the Supply Base area.
Detailed description of CB evaluation of mitigation measure and its conclusions
1. Interviews farmers, local people on-site at the plantation sites, as well as local authorities, to confirm that 100% of farmers in the region have granted LURC. 2. No conflicts of FPIC detected in the region. 3. Mitigation found sufficient to ensure that the feedstock is received as low risk.