



Supply Base Report:

TDM (Pty) Ltd.
Main (Initial) Audit

Sustainable Biomass Program
sbp-cert.org



Completed in accordance with the Supply Base Report Template Version 2.2 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

Version 1.0	Published 26 March 2015
Version 2.0	Published 10 August 2023
Version 2.1	Published 15 April 2024
Version 2.2	Published 21 May 2025
Version 2.3	Published 14 August 2025

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1 Overview

Producer name:	TDM (Pty) Ltd.
Producer address:	2 Measroch Street, 2380 Piet Retief, South Africa
SBP Certificate Code:	SBP-11-46
Geographic position:	-26.995396, 30.798324
Primary contact:	Neels Pienaar, +27 713 531 219, Neels.pienaar@nhrinvestments.co.za
Company website:	
Date report finalised:	09 Feb 2026
SBR reporting period from:	01 Sep 2024
SBR reporting period to:	31 Aug 2025
Name of the Certification Body:	Control Union Certifications BV
Certification Body Approval date:	20 Apr 2026
SBP Standard(s) used:	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 1A: SBP Requirements for Primary Feedstock from Trees Outside Forests (TOF) v1.0, Instruction Document 5E: Collection and Communication of Energy and Carbon data. v2.1, Instruction Document Japan: Bridging Requirements for meeting Japanese sustainability, legality and GHG saving requirements v1.1 -, Instruction Document EU RED: Bridging Requirements for Meeting the Directive EU/2023/2413 v2.0
Feedstock origin (countries)	South Africa (Mpumalanga; KwaZulu-Natal; Eastern Cape), Eswatini (Whole country - FSC certified plantations)
Weblink to Standard(s) used:	https://sbp-cert.org/documents/standards-documents/standards

2 Description of the Biomass Producer and the Supply Base

2.1 Description of the company

TDM (Pty) Ltd forms part of the TDM Group, founded in Pietermaritzburg, South Africa, in 1961. In 2017, the TDM Group, including TDM (Pty) Ltd, was acquired by Montigny Investments Ltd. TDM (Pty) Ltd (hereinafter “TDM”) continued to operate under its own business registration.

TDM’s core activity is purchasing fresh wood that falls outside local market specifications and processing it into wood chips for use as biofuel. This can include salvage wood from areas affected by fire, drought, pests or disease.

TDM is FSC certified. Its policy is to source from FSC-certified plantations and, in addition, to apply the SBP Supply Base Evaluation (SBE). TDM actively promotes FSC certification and supports plantation holders in preparing for it. However, to achieve SBP-compliant primary biomass, FSC certification alone is not sufficient and implementing an SBE is required. In exceptional cases, TDM may apply the SBP SBE to plantations that are in the process of obtaining FSC certification.

Products included in the scope of SBP Certification: WB 2.1 Wood chips

Number of employees: 12

Annual maximum production capacity (metric tonnes): 120000

Number of direct feedstock suppliers: 5

Approximate number of feedstock sub-suppliers: 0

Description of the chain-of-custody and upstream supply chain:

TDM (Pty) Ltd. procures biomass from landowners in Eswatini and eastern provinces of South Africa and transports it by truck to a storage facility near the port of Richards Bay. Some of the plantations are managed by affiliated companies.

TDM cooperates with a specialised chipping company that is also FSC-certified. Customers can purchase the biomass in Richards Bay or have it delivered to a harbour of their choice.

Over the course of this year, TDM looks forward to further expanding its activities at its own storage site near the harbour. The primary wood will be assessed and wood stems or stem sections that can be recovered for higher-grade applications will be processed. Construction of a sawmill is already underway. Both the primary and secondary feedstock will pass over a weighbridge before being chipped.

2.2 Detailed description of the Supply Base

Guidance: Tables below have been generated automatically for each sourcing country based on the selection of ‘Feedstock origin (countries)’ in section 1 above.

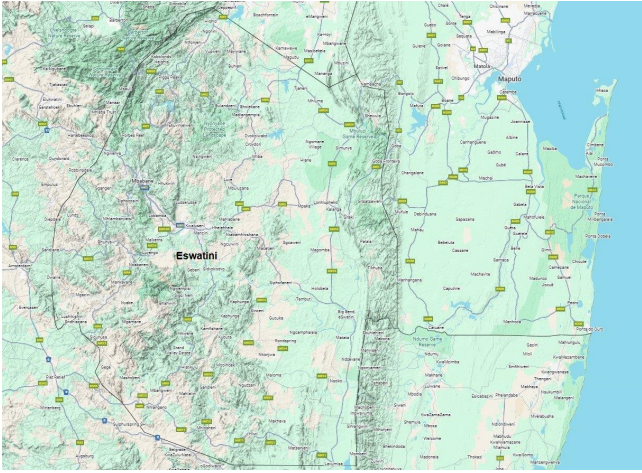
Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

Annex 2 is generated if EU RED SBE is in the scope for each country separately.

Country	South Africa
Area/Region	Mpumalanga; KwaZulu-Natal; Eastern Cape
Exclusions	
Feedstock types	Primary, Processing residues ¹
Feedstock Product Groups	Forest feedstock (1A), Trees outside forest (TOF) - Urban and landscape feedstock (2A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	No
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Biomass Producer's own risk assessment used (SBE)
Provide a concise summary of why a SBE was determined to be required or not required here:	
Primary biomass, not required by other markets, needs to pass the SBE to become SBP-compliant, even if originates from FSC certified plantations.	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	1.1120
Map(s) of the Supply Base area:	



Country	Eswatini
Area/Region	Whole country - FSC certified plantations
Exclusions	
Feedstock types	Primary, Processing residues1
Feedstock Product Groups	Forest feedstock (1A), Processing residues feedstock (4A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	No
For the forests in the Supply Base, is there an intention to retain, restock or encourage natural regeneration within 5 years of felling?	Yes - Majority
Risk assessment(s)	Yes – Biomass Producer's own risk assessment used (SBE)
Provide a concise summary of why a SBE was determined to be required or not required here:	
Primary biomass, not required by other markets, needs to pass the SBE to become SBP-compliant, even if originates from FSC certified plantations.	
Feedstock types included in SBE:	Primary
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	Yes
Includes EU RED II TOF grandfathering	No

Size of Supply Base area (million ha):	0.1371
Map(s) of the Supply Base area:	
	

2.3 Feedstock information

a. Total volume of Feedstock: 1-200,000 m3

b. Volume of primary feedstock: 1-200,000 m3

c. List of all the species in primary feedstock, including scientific name:

Acacia mearnsii	Black wattle
Acacia melanoxylon	Blackwood
Eucalyptus cladocalyx	Sugar gum
Eucalyptus diversicolor	Karri
Eucalyptus gomphocephala	Tuart
Eucalyptus grandis	Rose gum
Eucalyptus microcorys	Tallowwood (Wolbas)
Eucalyptus saligna	Saligna gum
Eucalyptus sideroxylon	Red ironbark
Pinus roxburghii	Chir pine
Pinus radiata	Insignis pine
Pinus elliottii	Slash pine
Pinus taeda	Loblolly pine
Eucalyptus nitens	Shining Gum
Eucalyptus fastigata	Brown Barrel
Eucalyptus smithii	Gully Gum
Eucalyptus camaldulensis	River Red Gum
Eucalyptus cloeziana	Gympie Messmate
Eucalyptus urophylla	Timor Mountain Gum
Eucalyptus fraxinoides	White Ash
Eucalyptus globulus	Southern Blue Gum
Corymbia maculata	Spotted Gum
Acacia decurrens	Early Green Wattle
Acacia dealbata	Silver Wattle
Eucalyptus macarthurii	Camden Woollybutt

Eucalyptus dunnii	Dunn's White Gum
Eucalyptus benthamii	Big Badja Gum
Eucalyptus benthamii	Camden White Gum
Corymbia henryi	Large-leaved Spotted Gum
Pinus patula	Patula Pine
Pinus elliottii × Pinus caribaea	Slash - Caribbean Pine hybrid
Pinus elliottii × Pinus taeda	Slash - Loblolly Pine hybrid
Pinus patula × Pinus taeda	Patula - Loblolly Pine hybrid
Pinus patula × Pinus greggii	Patula - Gregg's Pine hybrid
Eucalyptus grandis × Eucalyptus niten	Grandis - Nitens hybrid
Eucalyptus grandis × Eucalyptus camaldulensis	Grandis - Camaldulensis hybrid
Eucalyptus grandis × Eucalyptus tereticornis	Grandis - Tereticornis hybrid
Eucalyptus grandis × Eucalyptus urophylla	Grandis - Urophylla hybrid

- d. Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** Yes - Minority
Explanation: Control measures may be necessary when cultivating tree plantations.
- e. Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 60.00
- f. Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 40.00
- g. Proportion of feedstock composed of or derived from saw logs by weight (%):** 0.00
- h. Indicate how you determine the proportion of saw log:** Specification used by the sawmill closest to where the wood was grown.
- i. Roundwood from fellings from forests with > 40 yr rotation times - Average % volume of fellings delivered to BP (%):** 0.00
- j. Select forest type(s) where the primary feedstock was sourced from:** Other
- k. Select the main harvesting system(s) used for the sourced primary feedstock:** Clearcutting
- l. Volume of primary feedstock from primary forest:** 0
- m. Volume of processing residues feedstock:** 1-200,000 m3
Physical form of the feedstock: Chips, Sawdust, Offcuts, Clean chips or dust
- n. Share of SBP-recognised system claim for processing residues:**

100 % FSC

- o. Volume of post-consumer feedstock:** 0
Physical form of the feedstock: Chips, Sawdust, Offcuts, Clean chips or dust
- p. Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:**
 1000000 m3

q. What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated): 8000000.00 m3

Explanation: This estimate is based on the extent of (certified) plantations in the supply base, typical growth rates, the share of harvest residues, and short periods of insufficient demand for pulpwood (cascading principle).

3 Supply Base Risk Assessments and Risk Management Measures

Guidance: Biomass Producers shall demonstrate that any specified risks of sourcing feedstock not in compliance with SBP Standard 1 have been adequately reduced to low risk, following Standard 2 requirements. Following section applies to Biomass Producer's implementing SBP Supply Base Evaluation (SBP RRA or company own risk assessment). EU RED Supply Base Evaluation details are reported in Annex 2.

☐ **Not Applicable – Supply Base Evaluation not implemented**

3.1 Summary of the Supply Base Evaluation

Two SBEs were completed: one for three eastern provinces of South Africa and one for Eswatini. The sourcing scope is limited. In Eswatini, only known and affiliated FSC-certified plantations are in scope. In South Africa, almost all primary feedstock comes from FSC-certified plantations, with only rare sourcing from non-certified plantations. Our company supports and assists non-certified estates to become FSC-certified. In this report, “the plantations” refer to the planted eucalyptus/pine/wattle compartments only (not the full estate). Sourcing biomass from landscapes overgrown with alien invasive species (ecosystem restoration projects) is a potential future option under consideration.

The SBE for the Eswatini FSC-certified plantations identified 4 specified risks. The South Africa SBE identified 3 specified risks for FSC-certified plantations, 18 specified risks for non-certified plantations, and 14 specified risks for Trees Outside Forests – Landscape (clearing alien invasive tree species).

3.2 Conflicts with applicable national and sub-national legislation

No conflicts with applicable national or sub-national legislation were identified.

3.3 Risk Management Measures

Guidance: Please provide more details about specified risk indicators in each supply country and describe mitigation measures taken to address all specified risks associated with indicators.

Country: South Africa	
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim

	☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
1.1.1 Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.	
Description of the specific risk:	
This risk does not apply to FSC certified plantations. It applies to non-certified plantations and Trees Outside Forests (Landscape). Questions for each sourcing area are: who has the lawful right to use/manage the land (and the biomass), and is that right undisputed; if the land is communal/traditional-authority land, can the supplier prove the right-holder and consent/allocation from the recognised community/traditional structure and that there is no active dispute/claim affecting the right. For this SBE and the EU RED assessment it is needed to know when the plantation (or land-use change) was lawfully established/expanded and if it is lawfully operated today. Harvesting planted tree stands does not require a harvesting licence and no trading/transport permits are legally required for timber transport. Requesting these evidences is due diligence. On disturbed landscapes, alien invasive trees are regulated through a legal duty on landowners/users to prevent spread and to control or remove listed invasive species. Where infestations are left unmanaged, the invasive trees spread and increase and water consumption and deteriorate the environment.	
Mitigation measure:	
Proof is gathered on land rights and the relevant authorisations/registrations, including verification of water-licence approval or documented proof of application and progress. Proof of land ownership / lawful land use can be shown through a title deed (or deeds-office property record), a long-term lease or servitude, or a written land-use/management agreement authorising the land user to manage the area. Also gathered are site-specific establishment approvals—especially DWS water-use authorisation and/or water-user registration for afforestation as a Stream Flow Reduction Activity (or ELWU recognition plus registration for older plantations), and any required environmental authorisation/EIA (and other site-triggered approvals such as heritage/biodiversity where applicable). If a DWS licence/verification is not finalised, proof is needed that a formal process is actively in progress with DWS and that continued operation is lawful while it is concluded. For TOF landscape, proof is also gathered on land use rights. The landowner needs to provide the required authorisation, an invasive-species management plan, and proof of the presence and location of invasive species on the land (maps with species identification). The sale of biomass itself relies on the usual commercial/tax documents (including a VAT tax invoice where the seller is VAT-registered) and practical traceability documentation (delivery note/waybill). Payments are only made by bank transfer.	
Monitoring and outcomes:	
Our company has experience in collecting the required legality evidence for certified and uncertified estates and planted tree stands (plantations). This is integrated into our general due diligence system. In practice, most landowners provide the requested documentation (or our company does not to source from them). Our company has not yet sourced biomass from TOF landscapes (alien invasive species). This is being considered as a potential new possibility.	

Country: South Africa	
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.1 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.	
Description of the specific risk:	
This risk does not apply to FSC-certified plantations. It applies to uncertified plantations and TOF biomass from landscape clearing. Key biodiversity features and areas of HCV are generally not expected in planted compartments or in disturbed landscapes overgrown by alien invasive trees, but they can occur or develop over time. If these (unexpected) values are not adequately identified before harvesting/clearing, sourcing could affect them and proceed without required permits (TOPS permit for threatened/protected species; protected-tree licence for protected tree species). "Areas of HCV" also include areas with HCV5 (communal rights), although this is very rare in our supply base.	
Mitigation measure:	
Before each harvest, suppliers screen the site for biodiversity values and areas of HCV (including, for example, HCV5 where relevant) using available information and a targeted walkover. Findings are mapped and kept as documented evidence. Where a permit is required, work starts only once it has been obtained. Suppliers are checked routinely on a risk basis, and new suppliers are visited and evaluated before approval. The risk mitigation measures focus mainly on the non-eucalypt plantations, as in practice the eucalypt stands do not have any high biodiversity values.	
Monitoring and outcomes:	
Most of our biomass is sourced from FSC-certified plantations (low risk). Cooperation with a small number of uncertified plantations has started; they are advised and supported to move towards FSC certification. In general, commercial plantations seldom include high biodiversity value. The outcome on this indicator vary, and we needed to discontinue sourcing from some small suppliers.	

Country: South Africa	
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.2 Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.	
Description of the specific risk:	
This risk does not apply to FSC certified plantations. It applies to non-certified plantations and Trees Outside Forests (Landscape). Biodiversity values and areas of HCV that are present and mapped, including features that develop unexpectedly in plantations, or occur within a TOF clearing area, can deteriorate if an impact evaluation is missing or weak. Harvesting could disturb protected flora/fauna, habitats and buffer zones, or proceed without implementing required EMP conditions.	
Mitigation measure:	
If biodiversity values and/or HCV areas were found (indicator 2.1.1) suppliers perform a documented impact evaluation before harvesting. Evidence on the impact assessment is kept. Suppliers are checked routinely on a risk basis, and new suppliers are visited and evaluated before approval.	
Monitoring and outcomes:	
Most of our biomass is sourced from FSC-certified plantations (low risk). Cooperation with a small number of uncertified plantations has started. The outcomes on this indicator vary.	

Country: South Africa

Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.1.3 Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.	
Description of the specific risk:	
This risk does not apply to FSC certified plantations. It applies to non-certified plantations and Trees Outside Forests (Landscape). If biodiversity values and areas of HCV were identified, but the management response is weak, these values can deteriorate. This also applies to controlling and preventing the spread of invasive species.	
Mitigation measure:	
For planted tree stands and invasive-species clearing areas where biodiversity values and areas of HCV were identified, evidence is kept that the planned management measures were implemented. Records demonstrate that harvesting/clearing was carried out in line with the produced impact evaluation and its mitigation measures.	
Monitoring and outcomes:	
Most of our biomass is sourced from FSC-certified plantations (low risk). For non-certified suppliers, we review compartment-level implementation evidence during routine, risk-based site evaluations. It is very rare that protected biodiversity values or areas of HCV are found within the high-production monocultures. TOF landscape sourcing is within the defined supply base, but we have not started sourcing from areas overgrown with alien invasive species yet.	

Country: South Africa
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape
Risk Assessment used:

	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
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.	
Description of the specific risk:	
This risk applies to FSC certified plantations, non-certified plantations, and Trees Outside Forests (Landscape). Feedstock could originate from lands that were covered with forest, wetland, peatland, or highly biodiverse grassland in January 2008 and has since been converted or degraded. The concrete site of planned biomass sourcing (plantations and TOF landscapes) may fail this indicator and the similar one of the EU RED unless the land-cover in January 2008 is not investigated.	
Mitigation measure:	
Compliance is verified case by case by determining the land-cover type in January 2008 for the sourcing area. For plantations, this refers to production tree stands, including any recently extended tree-farming area. For TOF landscapes, this refers to the clearing area of invasive species. The indicator is considered met only if the area was not forest, wetland, peatland, or highly biodiverse grassland in January 2008. In practice this means the tree plantations were already established, and the landscape was already overgrown in January 2008. Several evidence pathways can demonstrate compliance. The most efficient pathway is sufficient. There is no need to conduct multiple parallel routes. This usually is proven by a combination of supplier documents (see indicator 1.1.1) and a source of historic land-cover evidence, such as historic imagery or data around 2008. There can be credible dated authorisations or management records. In case of pine, the age the trees can predate 2008. Any area that fails the EU RED assessment is also treated as non-compliant in the SBE.	
Monitoring and outcomes:	
Till now, all assessed plantation tree-stand compartments, including extended tree-farming areas, were established long before January 2008. We could get the evidence we needed in a practical way, mainly based on official documents. No TOF landscape areas with invasive species have yet been assessed and used for biomass sourcing.	

Country: South Africa	
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
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.	
Description of the specific risk:	
This risk does not apply to FSC certified plantations, nor to non-certified plantations. It only applies to Trees Outside Forests (Landscape). Managers of plantation compartments do not remove stumps and roots and have an incentive to leave sufficient residues onsite to protect soil fertility and limit erosion. In contrast, TOF landscape restoration projects may require removing all biomass of the invasive species, including residues, stumps and roots, to prevent regrowth and support recovery of native ecosystems. If this is done without appropriate, site-adapted methods, soil disturbance can cause erosion, loss of soil structure and organic matter, and damage to downstream ecosystems.	
Mitigation measure:	
Where TOF landscape restoration involves removal of residues, stumps or roots, the project will be assessed and the site visited by our own team to verify that the stated vegetation type and restoration objective are correct, that full-biomass removal is ecologically justified, and that the operation is planned and executed with site-adapted methods to avoid ecological damage. Documented evidence (including photos) is retained from the assessment and field inspections.	
Monitoring and outcomes:	
Our company considers this a potential new biomass source, but has not yet sourced from TOF landscapes.	

Country: South Africa	
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.5 Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.	
Description of the specific risk:	
This risk does not apply to FSC certified plantations and Trees Outside Forests (Landscape). It only applies to non-certified plantations. The specified risk is that biomass is sourced from sites that are not lawfully operated under the water and environmental framework, or that harvesting/clearing is planned and executed without adequate water-protection measures, leading to reduced water availability (quantity) and/or increased sediment/erosion impacts to downstream waters (quality).	
Mitigation measure:	
Suppliers must provide proof of lawful water use and water protection controls. This usually is the DWS water-use authorisation and/or registration for plantation forestry as a streamflow reduction activity (or ELWU recognition plus water-user registration and proof of lawful historic afforestation where applicable), and compliance with any other applicable environmental authorisation and EMP requirements for water protection. If an (updated) DWS authorisation/licence is pending, the requirement is considered met where the supplier can show documented proof of a formal application. Operational planning and implementation records must demonstrate that roading, harvesting and site preparation follow these water-protection measures. If needed, our company will investigate the validity of the authorisations/claims the supplier makes. For TOF landscape, suppliers must show that the invasive-species clearing plan is designed to maintain or enhance water functions, including erosion and sediment controls, protection of sensitive features and buffer zones. Where work affects watercourses, wetlands or regulated zones, applicable DWS requirements must be met. Documentation is retained as evidence.	
Monitoring and outcomes:	
Collecting evidence on the water-use authorisation process is an important part of our due diligence system. Suppliers are not legally obliged to provide this evidence, but they are usually willing to cooperate. Our	

company has not yet assessed any TOF landscape sourcing areas.

Country: South Africa	
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
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.	
Description of the specific risk:	
This risk does not apply to FSC certified plantations and Trees Outside Forests (Landscape). It only applies to non-certified plantations. Non-certified plantations may use pesticides without a documented Integrated Pest Management (IPM) plan, without full compliance with safety data sheets and chemical safety rules, or with active ingredients that are banned or otherwise not allowed under SBP "industry best practice". This could lead to non-compliant pesticide selection.	
Mitigation measure:	
Non-certified plantations need to they provide evidence of a documented IPM plan and pesticide controls that comply with South African law (only products registered under Act 36 and used in line with the label; compliance with occupational health and safety requirements, including safety data sheets, training and PPE). In addition, pesticide selection is checked against internationally recognised best-practice sources, and substances listed as WHO Class 1A/1B and those covered by the Stockholm Convention, the Rotterdam Convention (PIC) and the Montreal Protocol are not used. This is verified through on-site review of the IPM plan, spray records and product information, including confirmation that products are applied according to manufacturer specifications and safety data sheets.	
Monitoring and outcomes:	

Nearly all our suppliers are FSC-certified, and have an IPM plan in place. Cooperation with non-certified plantation holders on this topic is ongoing. The larger private owners tend to have a more structured approach to IPM than the small ones. This indicator leads to more (potential) suppliers that are excluded from cooperation.

Country: South Africa	
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.10 Harvested areas shall be regenerated	
Description of the specific risk:	
In South Africa there is no legal requirement to regenerate every harvested plantation compartment within a set period. In practice, private commercial plantations quickly re-establish harvested areas as standard business practice. Some state-managed plantation estates in the supply base, however, have been reported to have substantial replanting backlogs and lower success in establishing new tree stands, linked to weak protection and timber theft.	
Mitigation measure:	
Our company verifies whether a supplier is one of the reported underperforming state-run plantation estates. Underperforming suppliers are ruled out.	
Monitoring and outcomes:	
To date, no underperforming suppliers have been identified and there has been no sourcing from state-run plantation estates yet.	

Country: South Africa	
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
2.2.11 The impacts of natural processes such as fires, pests and diseases shall be managed.	
Description of the specific risk:	
Some state-managed plantation estates in the supply base have been credibly reported to have weak practical control (protection gaps, timber theft, replanting backlogs, etc.), which increases exposure to fires and reduces effective monitoring and response to pests and diseases. As a result, prevention and control of these natural processes may be insufficient.	
Mitigation measure:	
Our company verifies whether a supplier is one of the reported underperforming state-run plantation estates. Underperforming suppliers are ruled out.	
Monitoring and outcomes:	
To date, no underperforming suppliers have been identified, and there has been no sourcing from state-run plantation estates yet.	

Country: South Africa	
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed

	☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.1 All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.	
Description of the specific risk:	
This indicator is not applicable to Trees Outside Forests (Urban or Landscape). It applies to plantations, including FSC certified and uncertified plantations. South African law does not require monitoring or reporting of plantation carbon stocks, growing stock, yield trends, rotation productivity, or soil fertility to continue plantation harvesting, so legal compliance alone does not confirm stable or growing carbon stocks. In practice, commercial plantations in the supply base have stable stocks and yield rates, but credible reporting indicates that some state-run plantation estates have large areas left unplanted or understocked for long periods, linked to timber theft and weak protection/capacity. This can reduce average standing stock and yield and weaken carbon-stock stability.	
Mitigation measure:	
The long-term stability of the plantations (including soil fertility) and standard operational procedures are assessed during the initial supplier approval investigation. Any reports of insufficient management and/or deterioration of stocks and yields trigger additional research. This topic is not analysed in the EU RED Level B report for the supply base, because South Africa passed EU RED Level A. However, SBP requires continued monitoring of EU RED 29(6)(iv) and on-site field investigations, during which poor management and declining performance would become apparent.	
Monitoring and outcomes:	
Our company has not cooperated with state-run estates yet. The investigated private plantations show similar production levels from rotation to rotation and therefore stable average stocks. These production cycles are based on well-established cultivation systems developed through more than a century of commercial plantation forestry experience in eastern South Africa. The EU RED Level B investigation did not identify declining carbon stocks in the soil (including the top layer) or in the plantations. No indications of declining soil fertility were found.	

Country: South Africa

Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.1.1 Freedom of association and the right to collective bargaining shall be respected in the workplace.	
Description of the specific risk:	
This risk does not apply to FSC-certified plantations. It applies to uncertified plantations and Trees Outside Forests (Urban and Landscape). Although South African law protects freedom of association and collective bargaining, country-level reporting indicates regular violations, and union presence in parts of the forestry value chain is limited. At uncertified sites, workers, especially casual, seasonal or contractor labour, may face practical obstacles to joining unions or bargaining collectively, including limited union access and representation on site, short-term or fragmented employment that discourages organising, limited awareness of rights and grievance routes, and, in some cases, pressure, intimidation or retaliation that deters union activity.	
Mitigation measure:	
Our company communicates a clear policy requirement to all uncertified suppliers that freedom of association and the right to collective bargaining must be fully respected, including for casual and contractor workers, without intimidation, interference or retaliation. A grievance procedure must be available in the languages commonly used by the workers. Suppliers are informed that any stakeholder, including their contractors and workers, can raise a concern with our company about the supply chain through our publicly available Stakeholder Engagement Plan and Comment and Complaints Procedure. If a credible allegation, or an ongoing case indicates restriction of these rights, the biomass does not pass the SBE. Failure to resolve the issue leads to suspension and, ultimately, termination of cooperation with the supplier.	
Monitoring and outcomes:	
Suppliers did not raise concerns about our policy and sign our Supplier Declaration. Suppliers are rated and monitored on a risk basis, taking into account factors such as the use of contractors and temporary workers. This is the first year of SBP certification, and to date no comments or complaints have been received. Our supplier monitoring system requires onsite inspections, during which workers can be interviewed. This topic is part of our Stakeholder Engagement Plan.	

Country: South Africa	
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.1.4 Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.	
Description of the specific risk:	
This risk does not apply to FSC-certified plantations. It applies to uncertified plantations and Trees Outside Forests (Urban and Landscape). Although South African law prohibits workplace discrimination and provides remedies, national monitoring shows persistent discrimination and weak employer compliance. At uncertified sites, especially where outsourcing, small contractors, labour brokers and temporary/low-skilled work are common, controls over fair hiring, equal pay, access to training and promotion, and fair termination can be weak.	
Mitigation measure:	
Our company communicates a clear policy requirement to all uncertified suppliers that workers must not be discriminated against in hiring, remuneration, access to training, promotion, termination or retirement, including for casual and contractor workers. A grievance procedure must be available in the languages commonly used by the workers. Suppliers are informed that any stakeholder, including contractors and workers, can raise a concern about the supply chain through the publicly available Stakeholder Engagement Plan and Comment and Complaints Procedure. If a credible allegation or an ongoing case indicates discrimination or an unfair labour practice, the biomass does not pass the SBE. Failure to resolve the issue leads to suspension and, ultimately, termination of cooperation with the supplier.	
Monitoring and outcomes:	

Suppliers accept the policy and sign our Supplier Declaration. Suppliers are rated and monitored on a risk basis, considering their size and use of contractors and temporary workers.

This is the first year of SBP certification, and no comments or complaints have been received to date. Our supplier monitoring system requires onsite inspections, during which workers can be interviewed. This topic is part of our Stakeholder Engagement Plan.

Country: South Africa

Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- ☒ Biomass Producer's own risk assessment

Indicator with specified risk:

4.1.5 Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded

Description of the specific risk:

This risk does not apply to FSC-certified plantations. It applies to uncertified plantations and Trees Outside Forests (Urban and Landscape).

Although South Africa has a statutory National Minimum Wage, non-compliance occurs in low-wage and contractor-heavy work. At uncertified sites, especially where work is short-term, outsourced, informal or weather dependent (delays), there is a risk that workers are paid below the legal minimum wage and/or that pay is not evidenced with basic labour documentation.

Mitigation measure:

Our company requires uncertified suppliers (and any contractors/labour brokers they use) to pay at least the National Minimum Wage and to be able to demonstrate compliance with basic payroll evidence for each work package.

If credible concerns arise through monitoring or complaints, SBP acceptance is suspended while the supplier is investigated and must provide documented clarification; unresolved non-compliance leads to suspension or termination of cooperation. Proof of compliance can include time records, wage statements, and proof of payment, supported by contracts/work orders where applicable.

Monitoring and outcomes:

Suppliers sign the Supplier Declaration and are monitored on a risk basis, with increased attention where contractors and temporary workers are involved. This is the first year of SBP certification, and to date no comments or complaints related to minimum wage payment have been received.

Country: South Africa

Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- ☒ Biomass Producer's own risk assessment

Indicator with specified risk:

4.1.6 Working hours shall comply with legal requirements.

Description of the specific risk:

This risk does not apply to FSC-certified plantations. It applies to uncertified plantations and Trees Outside Forests (Urban and Landscape).

Although South African law sets binding limits and pay rules for ordinary hours, overtime, rest periods and Sunday/public-holiday work, national compliance reporting shows that working-time non-compliance persists, especially where timekeeping and supervision are weak. The risk is highest in contractor-driven, seasonal and task-based work (including short-term TOF crews and communal/smallholder contexts), where excessive hours, weak records and unpaid overtime can occur.

The topic is governed by laws and regulations. It, however, might happen that workers are discriminated against in the workplace due to lack of management control.

Mitigation measure:

This topic is part of the supplier monitoring and stakeholder engagement programmes. Wages are verified through interviews conducted with workers and employment contracts onsite. If doubts arise due to complaints or reported incidents, the case is investigated and the supplier must provide documented clarification. Suppliers (and their contractors/labour brokers) should be able to show the availability of time records and wage statements for the relevant workers. Overtime, rest periods and related pay practices

must comply with the BCEA and the Forestry Sectoral Determination.

Monitoring and outcomes:

Suppliers are rated and monitored on a risk basis, with increased attention where contractors, seasonal labour or task-based teams are involved. To date no comments or complaints related to working time have been received. Our supplier monitoring program includes field inspections, during which this topic can be discussed. Our supplier monitoring system requires onsite inspections, during which workers can be interviewed. This topic is part of our Stakeholder Engagement Plan.

Country: South Africa

Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- ☒ Biomass Producer's own risk assessment

Indicator with specified risk:

4.1.7 Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation

Description of the specific risk:

The risk is for all suppliers, but practically all points are covered by FSC certification. This indicator concerns whether workers in feedstock production have access to social protection (health care, sickness, retirement, invalidity, death benefits and workers' compensation). In South Africa, public health services are generally available, but benefit access depends on employer-side registrations and contributions. The specified risk is that workers—especially temporary, seasonal, casual or subcontracted workers—lack verifiable coverage (notably UIF for unemployment/sickness-related mechanisms and COIDA for work injury/death) and lack a credible retirement, invalidity and death-benefit mechanism beyond work-injury cases.

Risk is lowest in large companies with formalised operations and stable direct employment where compliance is auditable; it increases where contractors, labour brokers and subcontracting are used (including TOF invasive-species clearing).

By law, all employers should register for UIF and Workman's compensation (WCA). However, it might occur

that contractors working in uncertified plantations are not monitored do not not comply.

Mitigation measure:

Suppliers are assessed during initial approval and then monitored on a risk basis, with increased scrutiny where contractors, labour brokers, seasonal crews or invasive-species clearing teams are involved. Suppliers, including contractors and labour brokers, must confirm benefit coverage through non-personal evidence suitable for due diligence. This includes a signed Supplier Declaration, relevant contract clauses requiring compliance with labour law and benefit obligations, and company-level proof of active registrations/coverage (for example UIF and COIDA registrations/letters, certificates, or equivalent insurer/administrator confirmations), plus documented arrangements for retirement, death and invalidity benefits where applicable. Documentation to proof registration with WCA and UIF are required and verified. Unmanaged subcontracting is not permitted; subcontractors require prior approval and the same requirements must apply. For FSC-certified suppliers, available audit reports and corrective-action records are reviewed as supporting evidence. Suppliers are informed about our policy on this topic and that the Stakeholder Engagement Plan and the Comment and Complaints Procedure are public and open to all, including supplier contractors and workers. This topic is discussed with stakeholders. If doubts arise, additional clarification and evidence is requested. Where evidence is weak or gaps are identified, corrective actions and deadlines are agreed upon.

Monitoring and outcomes:

Practically all suppliers are FSC-certified and cooperative in proving compliance. To date no comments or complaints related to working time have been received. Our supplier monitoring program includes field inspections, during which this topic can be discussed.

Country: South Africa

Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape

Risk Assessment used:

- ☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim
- ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim
- ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim
- ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed
- ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim
- ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed
- ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed
- ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed
- ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim
- ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim
- ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim
- ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim
- ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim
- ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim
- ☒ Biomass Producer's own risk assessment

Indicator with specified risk:
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.
Description of the specific risk:
This risk does not apply to FSC-certified plantations. It applies to uncertified plantations and Trees Outside Forests (Urban and Landscape). By law all employers should provide training for all workers within their respective field of work. However, at uncertified sites, training may be informal, inconsistent or poorly documented, especially where subcontractors and seasonal crews are used. As a result, workers may not be adequately trained to perform routine and high-risk tasks competently and safely, or to meet legal and recognised sector best-practice requirements.
Mitigation measure:
Our company assesses suppliers' and subcontractors' training procedures and evidence during the initial supplier investigation and through monitoring and stakeholder engagement. Training verification covers all relevant roles, not only high-risk operators and first-aid functions. Training must be role-appropriate and sufficient, and competent supervision must be in place. Standard forestry work training could be done in-house, but more serious jobs such as machine operators should be done formally through registered institutions. Proof of training through attendance registers and or compliance certificates are verified. Where training and competence cannot be demonstrated, the biomass is treated as non-compliant. Suppliers are informed that any stakeholder, including contractors and workers, can raise a concerns through our publicly available Stakeholder Engagement Plan and Comment and Complaints Procedure.
Monitoring and outcomes:
Suppliers sign the Supplier Declaration and are monitored on a risk basis, with increased attention where subcontractors and seasonal labour are involved. To date no training-related complaints have been received, and no cases of non-compliance have been identified through monitoring. Our supplier monitoring system requires field inspections, during which this topic can be discussed.

Country: South Africa
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape
Risk Assessment used:
☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim

	☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.1.9 Mechanisms shall be in place for resolving grievances and disputes in the workplace.	
Description of the specific risk:	
This risk does not apply to FSC-certified plantations. It applies to uncertified plantations and Trees Outside Forests (Urban and Landscape). At uncertified sites, especially where subcontractors and seasonal crews are used, workplace grievance and dispute-resolution mechanisms may be informal, inconsistently applied or undocumented. Workers may lack clear, trusted channels to raise concerns, may fear retaliation, and complaints may not be addressed effectively in practice.	
Mitigation measure:	
During the initial supplier investigation, known and trusted sources are consulted for any indications of inconsistencies or poor complaint handling. Our company requires uncertified suppliers and their subcontractors to have and implement written grievance and dispute-resolution procedures, including a clear no-retaliation statement, clear steps and timelines, record keeping, and communication to workers in a form and language they understand. Suppliers are informed that our publicly available Stakeholder Engagement Plan and Comment and Complaints Procedure is open to all stakeholders, including supplier contractors and workers (with confidentiality provided where needed) and where effective grievance mechanisms and credible non-retaliation safeguards cannot be demonstrated, the biomass is treated as non-compliant, and the cooperation suspended.	
Monitoring and outcomes:	
Practically all suppliers are FSC-certified and this topic is well known. Uncertified suppliers sign the Supplier Declaration and have, or put in place, a formal grievance and dispute-resolution procedures. To date no comments or complaints have been received through our stakeholder or complaints channels. Our supplier monitoring system includes field inspections, during which the topic can be discussed with workers onsite.	

Country: South Africa	
Area/sub-scope: Mpumalanga; KwaZulu-Natal; Eastern Cape	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim

	☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
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.	
Description of the specific risk:	
This risk does not apply to FSC-certified plantations. South Africa has a functioning legal and institutional framework for occupational health and safety. It requires employers (including principal contractors) to identify hazards, put risk controls in place, provide information and instruction, ensure safe working procedures and correct use of PPE, and to report and investigate serious incidents, with inspections and enforcement by the Department of Employment and Labour. The specified risk is related to practical implementation. In large, formalised plantation operations with stable direct employment and demonstrable health-and-safety systems, safeguards are usually in place and applied. Risk increases where biomass supply depends on contractors, subcontractors and seasonal labour, because safeguards may exist in procedures but be inconsistently applied on site, such as weak task-based supervision, inconsistent PPE discipline, gaps in competence assurance and refresher training, poor incident and near-miss learning, and weak enforcement of stop-work rules. Trees Outside Forests invasive-species clearing is also treated as specified risk because work is often short-term and dispersed with variable supervision and documentation, and published evidence reports gaps in training and occupational health-and-safety practice in field operations.	
Mitigation measure:	
Suppliers and their subcontractors are required to implement formal, written health-and-safety procedures. These include clear assignment of tasks and supervision, hazard identification and risk controls, mandatory use and maintenance of PPE, incident and near-miss reporting, and role-appropriate training with records. Requirements must be communicated to workers in a language and form they understand. Suppliers are monitored through document checks and field inspections of operational performance. Suppliers are informed that our public Stakeholder Engagement Plan and the Comment and Complaints Procedure are open to all. Where effective safeguards and credible implementation cannot be demonstrated, the biomass is treated as non-compliant.	
Monitoring and outcomes:	
Practically all suppliers are FSC-certified. Uncertified suppliers sign our Supplier Declaration and have (installed) written procedures. To date no comments or complaints have been received through the stakeholder or complaints channels. Our supplier monitoring system also includes field inspections, during which the implementation of health and safety measures are investigated and discussed with workers onsite.	

Country: Eswatini	
Area/sub-scope: FSC-certified plantations	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
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.	
Description of the specific risk:	
This indicator is not covered by FSC certification. Feedstock could originate from lands that were covered with forest, wetland, peatland, or highly biodiverse grassland in January 2008 and has since been converted or degraded.	
Mitigation measure:	
The plantations and their compartments are verified through title deeds and historic evidence. This includes any extended tree-farming area. Our company checks if the area was already a plantation compartment in January 2008. Several evidence pathways can demonstrate compliance. This usually is proven by a combination of supplier documents and a source of historic land-cover evidence. There can also be credible dated authorisations. In case of pine, the age the trees can predate 2008. Any area that fails the EU RED assessment (it has similar but more strict requirements) is also treated as non-compliant in the SBE.	
Monitoring and outcomes:	
All assessed plantation tree-stand compartments, including extended tree-farming areas, were established long before January 2008. Evidence was based on official documents. Till now, all plantations were commercially grown and are more than 50 years in production.	

Country: Eswatini	
Area/sub-scope: FSC-certified plantations	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
3.2.1 All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.	
Description of the specific risk:	
SBP does NOT recognise FSC certification as sufficient to cover this. FSC does not provide information on carbon stocks and sinks. Monitoring plantation carbon stocks, growing stock, yield trends, rotation productivity, and soil fertility are not required by law to continue plantation harvesting.	
Mitigation measure:	
The long-term stability of the FSC-certified plantations in Eswatini (including soil fertility) and standard operational procedures are assessed during the initial supplier approval investigation. Any reports of insufficient management and/or deterioration of stocks and yields trigger additional research. Additionally, SBP requires continued monitoring of EU RED 29(6)(iv) and on-site field investigations, during which indications of poor management and declining fertility and performance would become apparent.	
Monitoring and outcomes:	
The FSC-certified plantations in scope were established over decades ago. Growth rates for the past and current rotations are verified per compartment and proved to be stable, indicating that average carbon stocks are also stable.	

Country: Eswatini

Area/sub-scope: FSC-certified plantations	
Risk Assessment used:	
	☐ SBP-RRA-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRA-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRA-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRA-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRA-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRA-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRA-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRA-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRA-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRA-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRA-CA-BC-FOR_v2.0 RRA for British Columbia FOR_Interim ☐ SBP-RRA-CA-NB-FOR_v1.0 RRA for New Brunswick FOR_Interim ☐ SBP-RRA-CA-NS-FOR_v1.0 RRA for Nova Scotia FOR_Interim ☐ SBP-RRA-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☒ Biomass Producer's own risk assessment
Indicator with specified risk:	
4.1.7 Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation	
Description of the specific risk:	
SBP recognises FSC certification as partially covering this indicator, because the FSC standard does not specifically require all social benefits mentioned in the SBP indicator. FSC explicitly requires compensation that corresponds to sickness and invalidity benefits. Some of the mentioned aspects are covered by law. Risk is lowest in large companies with formalised operations and stable direct employment where compliance is auditable; it increases where contractors, labour brokers and subcontracting are used.	
Mitigation measure:	
Suppliers are assessed during initial approval and then monitored on a risk basis, with increased scrutiny where contractors, labour brokers, seasonal crews or invasive-species clearing teams are involved. Suppliers, including contractors and labour brokers, must confirm benefit coverage through non-personal evidence suitable for due diligence. This includes a signed Supplier Declaration, relevant contract clauses requiring compliance with labour law and benefit obligations, and company-level proof of active registrations/coverage, such as UIF registration and WCA registration. For FSC-certified suppliers, available FSC audit reports are reviewed for any related non-conformances. Suppliers are informed of our policy on this topic and that our Stakeholder Engagement Plan and the Comment and Complaints Procedure are public and open to all. This topic is discussed with stakeholders. If doubts arise, additional clarification and evidence is requested. Where evidence is weak or gaps are identified, corrective actions and deadlines are agreed upon.	
Monitoring and outcomes:	
In Eswatini, our company cooperates with FSC-certified suppliers only. At these companies evidence is available about statutory registrations/contributions and compensation arrangements. The suppliers are cooperative to collect the required proof. To date, no comments or complaints have been received on this topic.	

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 07 Jan 2026

Biomass Producer's stakeholder engagement end date: 09 Feb 2026

Total number of stakeholders contacted: 35

Give a general description of the process of Stakeholders Engagement, including stakeholders contacted, method of communication and a summary of the comments received:

During development, TDM (Pty) Ltd. and BiomassConsult discussed the research questions and findings with several specialists to identify the most accurate answers. After the documents were completed, several people representing ecological, social, and economic aspects of biomass sourcing in South Africa and Eswatini were contacted and invited to comment on the SBEs and EU RED Level B reports. One stakeholder reacted with a positive response on the findings and mitigation measures (no comment for improvement).

4.2 Response to stakeholder comments

5 Report updates and approval

This document is: New Supply Base Report (Assessments/reassessments)

Summary of changes: N/A

Name	Rens Hartkamp
Title	Consultant
Date of report approval	09 Feb 2026

Name	Neels Pienaar
Title	Report author
Date of report approval	09 Feb 2026

Name	Attie Theunissen
Title	Management representative
Date of report approval	10 Feb 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	FSC-certified plantations Biomass delivered with FSC 100% claim. For practically each indicator where SBP considers an indicator covered, or partly covered, by FSC certification, the main SBV is the below publication. This reference is made once, but it applies to practically all indicators in this SBE. SBP Evaluation of FSC v1.0 (2023) – https://sbp-cert.org/wp-content/uploads/2023/12/SBP_Evaluation_of_FSC_v1.0_final.pdf Non-certified plantations and TOF Urban and Landscape Biodiversity Act: Regulations: Alien and Invasive Species (general duty to prevent spread and control listed invasive species) — https://www.gov.za/sites/default/files/gcis_document/202009/43735rg11176gon1020.pdf Conservation of Agricultural Resources Act 43 of 1983 (land-care framework; soil/water/vegetation protection; weeds/invasaders) — https://www.gov.za/documents/conservation-agricultural-resources-act-1-apr-2015-0926 Conservation of Agricultural Resources Regulations (written permission for virgin soil and related land-use controls) — https://cer.org.za/wp-content/uploads/2014/02/CARA-Regs.pdf Deeds Registries Act 47 of 1937 (title deed / registration framework) — https://www.gov.za/sites/default/files/gcis_document/201505/act47of1937.pdf Get Deeds Registry information (how to obtain deeds records / proof of ownership) — https://www.gov.za/services/services-residents/place-live/get-deeds-registry-information Environmental Impact Assessment Listing Notice 2 (afforestation / commercial timber production triggers for environmental authorisation) — https://www.gov.za/sites/default/files/gcis_document/201704/40772gon325.pdf Evaluation of the Forest Stewardship Council (FSC) scheme (SBP recognition/benchmarking of FSC) — https://sbp-cert.org/wp-content/uploads/2023/12/SBP_Evaluation_of_FSC_v1.0_final.pdf FSC National Forest Stewardship Standard of South Africa (states no legal requirements authorising plantation harvesting; DWS water-use licence as principal legal requirement to grow timber) — https://connect.fsc.org/document-centre/documents/retrieve/3dad4fe0-0c91-4b0d-b631-dcd799179ff3 National Environmental Management Act 107 of 1998 (general environmental duty/authorisation framework) —

	https://www.gov.za/sites/default/files/gcis_document/201409/a107-98.pdf National Heritage Resources Act 25 of 1999 (heritage authorisation where triggered) — https://www.gov.za/sites/default/files/gcis_document/201409/a25-99.pdf National Water Act 36 of 1998 s36 (afforestation for commercial purposes as a Stream Flow Reduction Activity) — https://lawlibrary.org.za/akn/za/act/1998/36/eng%401999-12-06/provision/chp_4__part_4__sec_36 Stream Flow Reduction Activities licensing guidelines (DWS) — https://www.dws.gov.za/sfra/Licensing/pdf/Combined%20Licensing%20Guide lines.pdf Tax invoices (VAT Act: tax invoice must be issued within 21 days) — https://www.sars.gov.za/businesses-and-employers/government/tax-invoices/
Risk Rating justification	Plantation timber in the Supply Base is legally straightforward when the plantation was lawfully established and the owner can prove land tenure or lawful management rights plus the required establishment authorisations. Key approvals typically relate to the National Water Act, 1998 from the Department of Water and Sanitation (DWS), the National Environmental Management Act, 1998 (often following an environmental impact assessment where required), and the Conservation of Agricultural Resources Act, 1983; biodiversity and heritage legislation apply where site conditions trigger them. No permits are required for harvesting commercial plantation timber. FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations The practical legality risk is that a plantation was established or expanded without the required authorisations, especially the water-use authorisation and water-user registration for plantation forestry as a streamflow reduction activity. If the owner provides valid, site-specific proof of land rights plus the applicable authorisations and registrations, that risk is mitigated. Providing these documents to the buyer is not a legal condition of sale. There are no trading permits or transport documents required by law to transport wood in South Africa, so requiring ownership and authorisation evidence is best viewed as due diligence. In practice, plantation holders commonly provide proof of ownership or land rights and proof of registrations and authorisations, and timber is accompanied by a delivery note stating farm and area details for traceability. Legally required in a sale is normal commercial/tax documentation: if the seller is a VAT-registered vendor, the VAT Act requires issuing a tax invoice (within 21 days, with prescribed particulars). In addition to proving land rights, any extra registrations depend on who holds the land and what activities take place. Where the land is held by a legal entity (company/close corporation/trust), the entity should be properly registered and tax-registered; VAT registration is only required if turnover reaches the legal threshold (or if registered voluntarily). Water-use registration or authorisation is not linked to ownership itself but to the activity:

	commercial plantation forestry is generally treated as a streamflow reduction activity and therefore typically triggers water-use authorisation/registration requirements, while other land uses may not. Trees Outside Forests Urban and Landscape (TOF) On agricultural land and disturbed landscapes, alien invasive trees are regulated through a legal duty on landowners / users to prevent spread and to control or remove listed invasive species. Where infestations are left unmanaged or where new planting/afforestation of listed invasive species occurs without the required authorisation the spread of alien invasive trees can increase and water supply can deteriorate. The risk is mitigated when the landowner can show an authorisation and an invasive-species management plan, proof of the presence and location of invasive species on the land (maps with species identification), and evidence of implementation. Proof of land ownership / lawful land use can be shown through a title deed (or deeds-office property record), a long-term lease or servitude, or a written land-use/management agreement authorising the land user to manage the area.
Risk Rating	Specified Risk

Eswatini Whole country - FSC certified plantations	Indicator
1.1.1	Operations related to feedstock sourcing and biomass production shall comply with all existing applicable laws and regulations.
Supply Base Verifiers	Biomass delivered with FSC 100% claim. For practically each indicator where SBP considers an indicator covered, or partly covered, by FSC certification the main SBV is the below publication. SBP Evaluation of FSC v1.0 (2023) – https://sbp-cert.org/wp-content/uploads/2023/12/SBP_Evaluation_of_FSC_v1.0_final.pdf We refer to this publication once here, but it applies to practically all indicators in this SBE.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.

Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
1.1.2	Legal ownership of land and resource use rights shall be respected.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Constitution of the Republic of South Africa, 1996 – Chapter 2 (Property rights; legal processes) — https://www.gov.za/documents/constitution/chapter-2-bill-rights Deeds Registries Act 47 of 1937 (formal land administration; registered title/tenure record) — https://www.gov.za/sites/default/files/gcis_document/201505/act47of1937.pdf Get Deeds Registry information (how to obtain deeds records as proof of ownership) — https://www.gov.za/services/services-residents/place-live/get-deeds-registry-information Interim Protection of Informal Land Rights Act 31 of 1996 (customary/informal rights; consent/permission evidence) — https://www.gov.za/sites/default/files/gcis_document/201409/act31of1996.pdf Commission on Restitution of Land Rights – Annual Report 2024/25 (claims settled; restitution administration) — https://static.pmg.org.za/Commission_on_Restitution_of_Land_Rights_CRLR_Annual_Report_2024-2025.pdf 9th LAMOSA Report (DLRRD) (claims settled since 1995; restitution progress reporting) — https://www.dlrrd.gov.za/images/restitution/9th-lamosa-report-jan-2024.pdf Administration of justice (courts/dispute resolution system overview) — https://www.gov.za/about-government/government-system/justice-system/administration-justice National Forests Act: Protected tree species (protected trees; licence/permit required to cut/transport/sell) — https://www.gov.za/sites/default/files/gcis_document/201912/42887gen635.pdf Application for a licence regarding protected trees (Section 15(1) National Forests Act) — https://www.dffe.gov.za/sites/default/files/docs/forms/forestry/protectedtreeslicence2025.doc
Risk Rating justification	Land and resource-use rights are protected through formal land administration (documented tenure/leases), constitutional protection of property rights, and established legal processes for disputes and land restitution, with large numbers of claims successfully settled and accessible courts.

	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations For plantations, the main potential weakness is where plantations occur on communal/traditional-authority land, because rights are exercised through customary allocation and can be disputed. Even there, the issue is usually only one of proving the right-holder and consent. Risk is mitigated when the operator can show a clear right to use/manage the land (title deed/registered lease where applicable, or a written land-use/management agreement or allocation/permission evidence from the recognised traditional/community structure), and there is no active dispute over that right (see indicator 1.1.1). Trees Outside Forests Urban and Landscape (TOF) The same principle applies for TOF, legality depends on having the landowner's (or lawful manager's) permission and any tree-specific legal permission where applicable. In particular, cutting certain protected trees outside forests can require a licence/permit even though this is not part of plantation harvesting. Mitigation is therefore proof of land rights/permission plus any required protected-tree licence for the specific trees involved. However, our company does not source protected tree species.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Alien and Invasive Species Regulations, 2020 (general obligations on landowners/users to prevent spread and control listed invasive species) — https://www.gov.za/sites/default/files/gcis_document/202009/43735rg11176gon1020.pdf CITES national authorities (South Africa CITES Management Authority contact details) — https://cites.org/eng/parties/country-profiles/za/national-authorities National Forests Act 84 of 1998 (protected trees and natural-forest licensing framework) — https://www.gov.za/sites/default/files/gcis_document/201409/a84-98.pdf National Road Traffic Regulations (Regulation 330C: goods declaration content to be carried when transporting goods on public roads) — https://www.gov.za/sites/default/files/gcis_document/201804/41586gon453.pdf South Africa as a party to CITES (DFFE overview of CITES controls and

	national implementation) — https://www.dffe.gov.za/south-africa-party-convection-international-trade-endangered-species-wild-fauna-and-flora-cites Tax Invoices (SARS guidance confirming VAT Act “tax invoice within 21 days” requirement) — https://www.sars.gov.za/businesses-and-employers/government/tax-invoices/ Value-Added Tax Act 89 of 1991 (primary law for VAT tax invoice requirements) — https://www.gov.za/sites/default/files/gcis_document/201505/act-89-1991s.pdf
Risk Rating justification	Our company always sources under sales agreements / contracts directly from landowners / managers of commercial plantations and does not source native species, moreover no CITES listed tree species. Each truckload of plantation wood transported on South African public roads must carry a goods declaration (typically a waybill/delivery note) stating at least the vehicle license number, the consignor and consignee details, the operator’s contact details, and the nature and quantity of the timber cargo. FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations Considering the scope of our business activities and the measures taken to mitigate the risks of SBP indicator 1.1.1, this indicator is sufficiently covered. Plantation harvesting itself does not require a harvesting license. Trees Outside Forests Urban and Landscape (TOF) Where TOF biomass arises from restoring overgrown land by clearing non-protected alien invasive trees, it is handled under the same legality and rights framework already described for indicators 1.1.1 (legal compliance) and 1.1.2 (ownership and resource-use rights). The specific point for “legally harvested, supplied and produced” is that each TOF delivery must be backed by landowner/land-user permission and clear evidence that the material is limited to non-protected alien invasive species from the defined area.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
1.1.3	Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.

Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
Supply Base Verifiers	Delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
1.1.4	Payments for harvest rights and feedstock, including duties, relevant royalties and taxes related to timber harvesting shall be complete and up-to-date.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. National Road Traffic Regulations (Regulation 330C: goods declaration for goods carried on public roads) — https://www.gov.za/sites/default/files/gcis_document/201804/41586gon453.pdf National Forests Act 84 of 1998 (licensing relates to natural forests/protected trees; not plantation harvesting) — https://www.gov.za/sites/default/files/gcis_document/201409/a84-98.pdf CITES national authorities (South Africa; CITES management/scientific authority) — https://cites.org/eng/parties/country-profiles/za/national-authorities DFFE (South Africa as a Party to CITES; national implementation) — https://www.dffe.gov.za/south-africa-party-convection-international-trade-endangered-species-wild-fauna-and-flora-cites Alien and Invasive Species Regulations, 2020 (duty to control listed invasive species) — https://www.gov.za/sites/default/files/gcis_document/202009/43735rg11176gon1020.pdf VAT tax invoices (SARS guidance: tax invoice within 21 days; prescribed particulars) — https://www.sars.gov.za/businesses-and-employers/government/tax-invoices/ Value-Added Tax Act 89 of 1991 (VAT law) —

	https://www.gov.za/sites/default/files/gcis_document/201505/act-89-1991s.pdf Corporate Income Tax (SARS; registration and compliance under the Income Tax Act) — https://www.sars.gov.za/types-of-tax/corporate-income-tax/Income Tax Act 58 of 1962 (primary income tax law) — https://www.gov.za/documents/income-tax-act-29-may-1962-0000 Tax Compliance Status (SARS; TCS PIN system used for tax compliance verification) — https://www.sars.gov.za/individuals/manage-your-tax-compliance-status/ National Water Act s36 (commercial afforestation as a stream flow reduction activity) — https://lawlibrary.org.za/akn/za/act/1998/36/eng%401999-12-06/provision/chp_4__part_4__sec_36 DWS SFRA system (stream flow reduction activity licensing framework) — https://www.dws.gov.za/sfra/Default.asp DWS Pricing Strategy (water resource charges framework) — https://www.dws.gov.za/projects/Pricing%20Strategy/default.aspx
Risk Rating justification	Our company pays for sourced biomass either in advance (for standing compartments) or upon delivery against the weighbridge statement and supplier invoice, in line with the contract. FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations For plantation feedstock, payment risk is low because purchases are governed by sales agreements with landowners and payments follow agreed commercial terms (standing compartments paid before harvesting; delivered wood paid against weighbridge statement and supplier invoice). This aligns with the South African context where plantation harvesting does not attract a specific state “harvest royalty/fee” regime (there is no legislation requiring specific royalties or harvesting fees to be paid to authorities based on harvesting). The relevant statutory payments are business taxes (VAT and profit taxes), which are well enforced by the South African Revenue Service and supported by the use of tax clearance certificates. Where applicable, plantation owners must also be registered as water users, and any water-use charges are generally low risk. Trees Outside Forests Urban and Landscape (TOF) For TOF feedstock from clearing non-protected alien invasive trees on restoration land, the same payment logic applies (commercial agreement with the landowner/land user, normal tax compliance), and there is likewise no separate harvest-royalty/fee payment regime; the key focus is on keeping the supply limited to the agreed scope and paying per the contract.
Risk Rating	Low Risk

Mpumalanga; KwaZulu-Natal; Eastern Cape	
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Constitution of the Republic of South Africa, 1996 – Bill of Rights (property rights) — https://www.gov.za/documents/constitution/chapter-2-bill-rights Deeds Office (property registry; deeds registration system) — https://www.deeds.gov.za/ Get Deeds Registry information (how to obtain deeds records) — https://www.gov.za/services/services-residents/place-live/get-deeds-registry-information Forestry South Africa – Operations (crime in forestry; theft/illegal mining; industry security focus) — https://www.forestrysouthafrica.co.za/operations/ State of the Forests Report 2018 (timber theft, particularly in State-owned plantations) — https://www.gov.za/sites/default/files/gcis_document/202208/stateofforestssouthafricareport2018.pdf State of the Forests Report 2021 (plantation-sector threats; security constraints) — https://www.dffe.gov.za/sites/default/files/reports/stateoftheforestsreport_2021.pdf Environmental Guidelines for Commercial Forestry Plantations in South Africa (planning/operational norms incl. mapped compartments and fire management practices) — https://forestry.co.za/wp-content/uploads/2022/12/Environmental-Guidelines-for-Commercial-Forestry-Plantations-in-South-Africa-2019-low-res.pdf SBP Evaluation of the Forest Stewardship Council (SBP recognition/coverage of indicators) — https://sbp-cert.org/wp-content/uploads/2023/12/SBP_Evaluation_of_FSC_v1.0_final.pdf
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator (low risk). Uncertified plantations For plantations in the supply base (large corporate estates and smaller private plantations), the risk of the sourcing being undermined by unauthorised or other illegal activities is low because plantation land is clearly defined and documented. Land parcels are recorded in a deeds/cadastre system and operational boundaries are mapped (compartments, roads, firebreaks). Practically all plantations have been established and managed for decades, so ownership and use rights are stable and well known locally. This, together with routine management presence (regular access, fire protection and security), makes illegal logging, illegal mining and encroachment difficult to execute and conceal. For plantations the risk of unauthorised and illegal activities is low. Illegal activity can occur, but it is rare and limited to small-scale, opportunistic

	incidents and does not constitute a systematic recurring issue. The corporate timber growers in scope have security systems in place to protect their property from illegal activities. Where independent security companies are engaged, service agreements are signed. Trees Outside Forests Urban and Landscape (TOF) This indicator is not applicable to TOF.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
1.1.5	There shall be adequate protection of the Supply Base from unauthorised and illegal activities, such as illegal logging, mining, and encroachment.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
2.1.1	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
2.1.1	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. National Environmental Management Act 107 of 1998 (NEMA) (legal basis for EMP conditions and compliance) — https://www.gov.za/sites/default/files/gcis_document/201409/a107-98.pdf NEMA s28 (duty of care; prevent/remedy environmental degradation) — https://lawlibrary.org.za/akn/za/act/1998/107/eng%401999-01-29/provision/chp_7__part_1__sec_28

	NEMA (Environmental Management Inspectors: designation/powers in the Act text) — https://lawlibrary.org.za/akn/za/act/1998/107/eng%401999-01-29 Environmental Management Inspectorate (EMI) (Green Scorpions; enforcement) — https://www.dffe.gov.za/environmental-management-inspectorate-emi About EMI (DFFE) — https://www.dffe.gov.za/rcsm_emi Environmental Impact Assessment Regulations, 2014: Amendments (EIA/EA/EMPr framework link) — https://www.gov.za/documents/national-environmental-management-act-regulations-environmental-impact-assessment-7 National Environmental Management: Biodiversity Act 10 of 2004 (NEMBA) — https://www.gov.za/documents/national-environmental-management-biodiversity-act-0 Threatened or Protected Species Regulations (TOPS) (permits for restricted activities) — https://www.cer.org.za/wp-content/uploads/2004/09/TOPS-Regs.pdf Alien and Invasive Species Regulations, 2020 (duty to control listed invasives; permits for restricted activities) — https://www.gov.za/sites/default/files/gcis_document/202009/43735rg11176gon1020.pdf National Forests Act 84 of 1998 (protected trees; licensing framework) — https://www.gov.za/sites/default/files/gcis_document/201409/a84-98.pdf National Forests Act: Protected tree species list (Gazette) — https://www.gov.za/sites/default/files/gcis_document/201912/42887gen635.pdf Protected tree licence application form (DFFE) — https://www.dffe.gov.za/sites/default/files/docs/forms/forestry/protectedtreeslicence2025.doc SBP Evaluation of the Forest Stewardship Council (FSC) scheme (SBP recognition/coverage) — https://sbp-cert.org/wp-content/uploads/2023/12/SBP_Evaluation_of_FSC_v1.0_final.pdf
Risk Rating justification	Our company sources almost all feedstock from FSC-certified plantations, with only rare sourcing from non-certified plantations. The possibility to source biomass from landscapes overgrown with alien invasive species is considered. With “the plantations” this report refers to the planted eucalyptus/pine/wattle compartments only. Any other land within the estate (often also collectively referred to as “plantations”) is outside the scope of assessment. As a limited exception: any possible future sourcing from overgrown sites would be restricted to areas that were already overgrown in January 2008. Sites that had indicator-relevant characteristics in January 2008 (forests, wetlands, peatlands, highly biodiverse grasslands) and have since become overgrown are non-compliant (see also the EU RED Level B report). FSC-certified plantations SBP recognises that FSC certification covers this indicator (low risk). Uncertified plantations

Key biodiversity features in the supply base are primarily expected in the unplanted matrix around plantations, rather than in the planted compartments themselves. Eucalyptus compartments are unlikely to contain biodiversity values within the stand, whereas pine compartments can sometimes support some habitats of species and therefore require screening of onsite features. Habitats and protected species can appear over time, sometimes quickly, so screening should be repeated before harvesting.

Legally, plantation holders must comply with the conditions of environmental authorisations and its EMPr (Environmental Management Programme), which is where requirements to identify and protect sensitive habitats/buffers and any species-related restrictions are set, and compliance must be audited and reported.

Authorised Environmental Management Inspectors (the “Green Scorpions”) may, at a reasonable time, carry out routine compliance inspections and enter and inspect land/premises without a warrant to check compliance with NEMA and the specific environmental laws they are designated for - so this can include privately owned plantation land.

If harvesting would involve a “restricted activity” affecting a listed threatened or protected species, a TOPS permit under NEMBA is required; if any legally protected tree species is affected, a protected-tree licence under the National Forests Act is required.

In common practice, plantation managers screen the compartment against the EIA/EMPr information and biodiversity layers, then do a targeted pre-harvest walkover any sensitive features, and keep this as documented evidence such as updated maps/buffer markings, a signed pre-harvest checklist, and copies of any permits and audit reports on file. If harvesting or associated operations could trigger restricted activities involving threatened/protected species, the required species permit must be in place before work starts.

Trees Outside Forests Urban and Landscape (TOF)

Not applicable for urban and infrastructure areas; only applicable to landscapes.

In landscapes, TOF feedstock may arise from clearing of non-protected alien invasive trees on disturbed land. In contrast to plantations, key biodiversity features can occur directly within the clearing area (riparian strips, wetlands, natural grassland remnants, indigenous tree clumps, nesting/roosting sites), so the site must be screened carefully.

Legally, landowners/users must comply with all applicable environmental authorisation and duty-of-care requirements under NEMA, and with invasive-species control obligations where alien invasive trees are involved.

Compliance can be inspected on private land by authorised Environmental Management Inspectors. Where clearing would involve a restricted activity affecting a listed threatened or protected species, a TOPS permit under NEMBA is required; if any legally protected tree species is affected, a protected-tree licence under the National Forests Act is required.

In common practice, the landowner/contractor conducts a targeted site walkover before clearing to identify and mark sensitive features, confirms that

	only non-protected tree species are within scope, and keeps documented evidence. If protected species, valuable ecosystems, or HCV areas are identified, the required permits must be in place before work starts.
Risk Rating	Specified Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
2.1.2	Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. National Environmental Management Act 107 of 1998 (basis for environmental authorisations and EMPr compliance) — https://www.gov.za/sites/default/files/gcis_document/201409/a107-98.pdf Environmental Impact Assessment Regulations, 2014 (current consolidated text; EMPr and compliance/auditing framework) — https://cer.org.za/wp-content/uploads/1999/01/NEMA-EIA-Regulations-2014-current-as-at-5-Feb-2025.pdf Environmental Management Inspectorate (EMI) (“Green Scorpions”; compliance inspections and enforcement) — https://www.dffe.gov.za/environmental-management-inspectorate-emi National Environmental Management: Biodiversity Act 10 of 2004 (legal basis for TOPS permits/restricted activities) — https://www.gov.za/documents/national-environmental-management-biodiversity-act-0 TOPS permit and registration (DFFE) (permits for restricted activities involving listed threatened/protected species) — https://www.dffe.gov.za/bc_permit_tops National Forests Act 84 of 1998 (protected trees; licence requirement where protected tree species are affected) — https://www.gov.za/sites/default/files/gcis_document/201409/a84-98.pdf Evaluation of the Forest Stewardship Council (FSC) scheme (SBP recognition/coverage of indicators) — https://sbp-cert.org/wp-content/uploads/2023/12/SBP_Evaluation_of_FSC_v1.0_final.pdf
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator (low risk). Uncertified plantations For plantation harvesting, the main impacts on biodiversity values are usually not inside the planted compartment but on the identified adjacent/embedded natural features. However, if such values are identified, the required step is to (map and) evaluate threats and impacts by checking every planned operation against the identified features. This “impact evaluation” is a pre-harvest assessment.

	Trees Outside Forests Urban and Landscape (TOF) Not applicable for urban and infrastructure areas; only applicable to landscapes. For TOF landscape clearing (restoration/clearing of non-protected alien invasive trees on overgrown land), impacts can occur within the clearance footprint; an impact evaluation must cover the site for protected flora and fauna, habitats, and buffer zones that could be disturbed. If biodiversity values or areas of HCV are identified, a pre-activity impact checklist/method statement (how impacts will be avoided/minimised), and planned implementation records are required. Where a protected species would be affected in a restricted way, the relevant biodiversity permit is required. An impact evaluation against mapped values and legally binding EMP conditions can be required.
Risk Rating	Specified Risk

Eswatini Whole country - FSC certified plantations	Indicator
2.1.2	Threats to and impacts on the identified key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be identified and evaluated.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
2.1.3	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
2.1.3	Key species, habitats, ecosystems, and areas of high conservation value (HCV) pertaining to biodiversity in the Supply Base shall be maintained or enhanced.

Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Alien and Invasive Species Lists, 2020 (GN 1003) — https://www.dffe.gov.za/sites/default/files/legislations/nemba_invasivespecieslist_g43726gon1003.pdf Alien and Invasive Species Regulations, 2020 (GN 1020) — https://www.gov.za/sites/default/files/gcis_document/202009/43735rg11176gon1020.pdf Biological Invasions Report in South Africa, 2022 (SANBI) — https://www.sanbi.org/wp-content/uploads/2024/03/Biological-invasions-Report-in-South-Africa-in-2022.pdf Biodiversity Planning (SANBI) — https://www.sanbi.org/biodiversity/science-into-policy-action/mainstreaming-biodiversity/biodiversity-planning/ Enforcing the Law: the challenges undermining environmental compliance and enforcement (CER) — https://fulldisclosure.cer.org.za/2015/enforcing-the-law Green Scorpions losing their venom (The Herald, Eastern Cape budget example) — https://www.theherald.co.za/news/2024-07-29-green-scorpions-losing-their-venom/ National Biodiversity Assessment 2018: Synthesis Report (SANBI) — https://www.sanbi.org/wp-content/uploads/2024/06/2019_NBA-Synthesis-report.pdf National Environmental Compliance and Enforcement Report (DFFE media release) — https://www.dffe.gov.za/mediareleases/necer National Environmental Management Act 107 of 1998 (official PDF) — https://www.gov.za/sites/default/files/gcis_document/201409/a107-98.pdf National Environmental Management Act 107 of 1998 (consolidated, incl. inspector powers) — https://www.saflii.org/za/legis/consol_act/nema1998331.pdf National Environmental Management: Biodiversity Act 10 of 2004 (consolidated) — https://www.saflii.org/za/legis/consol_act/nemba2004476/ Protected Areas Register (PAR) — https://dffeportal.environment.gov.za/portal/apps/webappviewer/index.html?id=7e27f116dd194c1f9d446dacc76fe483 SAPAD (South African Protected Areas Database) — https://dffeportal.environment.gov.za/portal/home/item.html?id=726407f90c1c4a1f9fc2c4779d25ef0b
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator (low risk). Uncertified plantations Indicators 2.1.1 and 2.1.2 already cover the need to respond if any unexpected biodiversity values or protected species emerging in or near the monoculture stands; indicator 2.1.3 concerns ongoing implementation, such as maintaining mapped buffers/no-go areas, keeping set-asides intact, and controlling invasives. For non-certified plantations, maintaining and enhancing biodiversity values is mainly an initial set-aside aspect, rather than one pertaining to established

	compartments. The main plantation-linked maintenance risks are off-site impacts, especially the spread of invasive species, notably into terrestrial habitats such as fynbos and riparian/freshwater areas. Under South African biodiversity law, preventing the spread of invasive species is a legal duty on the landowner/person in control of land (NEMBA, section 73(2)(b)–(c)). For listed invasive species (including categories 1a, 1b and 3), this includes preventing escape and spread (including spread of propagules) and controlling any specimens that escape or spread (Alien and Invasive Species Regulations, 2020, regulation 7(1)); certain restricted activities are prohibited (NEMBA, section 71A) and, for category 2 species, restricted activities require a permit and the permit holder must ensure the species does not spread outside the permitted/demarcated area (Alien and Invasive Species Regulations, 2020, regulations 4(2)–(3)). Control/eradication must be carried out with least possible harm to biodiversity and must address propagating material and regrowth to prevent re-establishment (NEMBA, section 75(2)–(3)). These obligations sit alongside NEMA’s duty of care to prevent and remedy environmental harm and are implemented through invasive-species control and buffer/set-aside management, with enforcement by the Environmental Management Inspectorate (“Green Scorpions”) and provincial/national conservation authorities; inspectors can enter and inspect private holdings, but authority audits are generally ad hoc rather than systematic, with coverage typically risk-based and often complaint/incident driven. Public reporting shows inspections and enforcement actions occur nationally, but government-aligned and civil-society sources repeatedly highlight capacity and budget constraints, including reductions in inspector numbers in some periods. A concrete provincial example is the Eastern Cape, where reporting describes the provincial Green Scorpions’ operational budget being cut to about R1.6 million (2024/25), which was presented as severely constraining inspection capacity. Trees Outside Forests Urban and Landscape (TOF) Not applicable for urban and infrastructure areas; only applicable to landscapes. For TOF landscape feedstock and the clearing on overgrown lands, the aspect of management and enhancement has direct applicability, because valuable habitats and protected species can occur within the clearing area. The operator must actively maintain protected features, such as buffer zones, protection of indigenous trees, and prevention of secondary degradation issues. Regional government biodiversity tools support this by defining conservation priorities and protected areas (Protected Areas Register / SAPAD, and SANBI biodiversity planning products such as bioregional/sector plans and the National Biodiversity Assessment), which can be used to target where extra protection is needed. Law enforcement is through the Environmental Management Inspectorate (“Green Scorpions”) and provincial conservation authorities, supported by national compliance reporting; performance is generally seen as real but
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	uneven, with documented capacity constraints and recurring non-compliance themes (including failures to control invasive species), so relying on regional tools and strong site-level implementation records remains necessary. NGOs and the scientific community generally regard invasive alien plants as a major, ongoing national threat and support active control, but also note that control outcomes are mixed: despite long-running programmes and substantial expenditure, invasions have in several areas continued to expand, so adequacy cannot be assumed without site-level evidence of control being implemented and maintained.
Risk Rating	Specified Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	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.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Alien and Invasive Species Regulations, 2020 (GN R.1020) — https://www.gov.za/sites/default/files/gcis_document/202009/43735rg11176gon1020.pdf Biodiversity Planning (SANBI) — https://www.sanbi.org/biodiversity/science-into-policy-action/mainstreaming-biodiversity/biodiversity-planning/ CDNGI Geospatial Portal (NGI orthophotos/aerial imagery) — https://ngigeoportal.dlrrd.gov.za/cdngiportal/ Deeds Registration (Deeds Office) — https://www.deeds.gov.za/ DeedsWEB — https://deedsweb.deeds.gov.za/deedsweb/welcome.jsp DFFE EGIS GIS Data Downloads (SANLC) — https://www.dffe.gov.za/egis Directive (EU) 2018/2001 (Renewable Energy Directive) — https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32018L2001 Eastern Cape Green Scorpions operational budget (The Herald) — https://www.theherald.co.za/news/2024-07-29-green-scorpions-losing-their-venom/ KZN Land Cover 2008 (metadata record) — https://metadata.sanbi.org/srv/api/records/20a9f759-2d1f-4765-b5c0-6feee04c419f National Environmental Compliance and Enforcement Report (DFFE) — https://www.dffe.gov.za/mediareleases/necer National Environmental Management Act 1998 (consolidated, incl. inspector powers) — https://www.saflii.org/za/legis/consol_act/nema1998331/ National Environmental Management: Biodiversity Act 2004 (consolidated) — https://www.saflii.org/za/legis/consol_act/nemba2004476/ Protected Areas Register (PAR) — https://dffportal.environment.gov.za/portal/home/item.html?id=e26325c4e4a24f04b697323edb6f485d SAPAD (South African Protected Areas Database) —

	https://dffeportal.environment.gov.za/portal/home/item.html?id=726407f90c1c4a1f9fc2c4779d25ef0b USGS EarthExplorer (historic satellite imagery) — https://earthexplorer.usgs.gov/ USGS Landsat Data Access — https://www.usgs.gov/landsat-missions/landsat-data-access Working for Water programme (DFFE) — https://www.dffe.gov.za/working-water-wfw-programme
Risk Rating justification	For main aspects related to land use, legislation, and law enforcement, see also SBE indicators 1.1.1 (legislation feedstock sourcing and biomass production) and 2.2.3 (management of soil quality). The question here is whether feedstock could come from land that in January 2008 was forest, wetland, peatland or highly biodiverse grassland and has since been converted. FSC-certified plantations SBP's benchmark report concludes that FSC certification covers this indicator only partially (see uncertified plantations). Uncertified plantations The plantation holding needs to be verified. In case new plantations are considered for biomass sourcing, they are assessed against this SBP indicator and the equivalent one of the EU RED. Any plantation that does not pass the EU RED assessment is also considered non-compliant in the SBE. In South Africa it is reasonable to rely on title deeds from the Deeds Registry as primary evidence of land ownership and tenure rights. However, a title deed is a legal record of the land parcel and ownership history, not a land-use record, so it does not evidence the actual date of land-conversion; this should therefore be corroborated with other information sources such as historic imagery and, where available, dated authorisations or management records. To verify land cover and potential conversion against the situation around January 2008, the most practical additional sources are historic satellite imagery (especially Landsat 5/7 for 2007–2009), provincial land-cover products close to that date (notably KwaZulu-Natal Land Cover 2008 for the eastern region), the national land-cover series from the environmental authority (National Land Cover/SANLC layers to compare pre- and post-2008 conditions), high-resolution NGI orthophotos/aerial imagery where coverage exists, and SANBI biodiversity planning layers (protected areas and priority biodiversity areas) to check whether the site overlaps or borders mapped valuable habitats and sensitive buffer zones. Trees Outside Forests Urban and Landscape (TOF) Not applicable for urban and infrastructure areas; only applicable to landscapes. There is a significant chance that landscape areas have deteriorated since January 2008. The environmental characteristics of landscape areas cannot be determined generically in this report and must be verified on a case-by-case basis.

	Landscape restoration/clearing of alien invasive trees is common in South Africa, including through large public programmes such as Working for Water, which reports clearing over one million hectares of invasive alien plants. The legal basis is mainly NEMBA and its Alien and Invasive Species Regulations: the landowner must take steps to prevent the spread of listed invasives and to control them (with permit rules for certain restricted activities). Enforcement is in place through Environmental Management Inspectors (“Green Scorpions”) and provincial/national conservation authorities. Public reporting shows they do both strategic and reactive inspections. Plantation holders and restoration projects can be inspected. Enforcement actions occur nationally, but capacity limitations are repeatedly reported.
Risk Rating	Specified Risk

Eswatini Whole country - FSC certified plantations	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.
Supply Base Verifiers	Biomass delivered with FSC 100% claim from plantations in scope. The assessed FSC certified plantations comply with this requirement. Biomass origin is verified. In case additional plantations are considered for biomass sourcing, they also need to be assessed against this SBP indicator and the similar one for the EU RED. Any plantation that does not pass this assessment is considered non-compliant. Historical databases and maps of the plantation area are consulted to determine whether land conversion occurred or valuable habitats deteriorated after 2007.
Risk Rating justification	SBP partially recognises that FSC certification covers this indicator. The EU RED Level B assessment confirmed that the FSC-certified plantations in scope comply with this indicator (see the EU RED Level B report). All biomass is sourced from FSC-certified plantations. With “the plantations” is meant the planted eucalyptus/pine/wattle compartments only. Any other lands within the estate (often collectively referred to as “the plantations”) are outside the scope of the EU RED Level B assessment.
Risk Rating	Specified Risk

Eswatini Whole country - FSC certified plantations	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.

Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
2.2.2	Ecosystems, their health, vitality, functions and services in the Supply Base shall be maintained or enhanced.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Biodiversity Act TOPS Regulations, 2015 (GN R.389) — https://www.gov.za/sites/default/files/gcis_document/201503/38600gen256.pdf DWS Water Use Authorisation Process (incl. Section 21(d) SFRA) — https://www.dws.gov.za/ewulaas/WUA.aspx Environmental Impact Assessment Regulations, 2014 (FAOLEX / Government Gazette) — https://faolex.fao.org/docs/pdf/saf142066.pdf Procedural requirements for Water Use Licence Applications (GN 267, 2017) — https://www.gov.za/sites/default/files/gcis_document/201703/40713rg10701gon267.pdf TOPS permit application process (DFFE) — https://www.dffe.gov.za/tops-permit-and-registration-application-process-carrying-out-restricted-activities-terms-nemba-10 Working for Water as PES + water-loss context (CBD case study PDF) — https://www.cbd.int/financial/pes/southafrica-pesworkingforwater.pdf
Risk Rating justification	This indicator should be read together with SBE indicator 2.1.1 (identifying biodiversity values), 2.1.2 (evaluating threats and impacts), and 2.1.3 (maintaining and enhancing conservation values). Here the focus is specifically on whether the current framework maintains and enhances forest ecosystems and their services. Ecosystem impacts are managed by applying site-specific buffers/no-go areas and invasive-species control rules; where clearing takes place in conservation features (riparian zones, wetlands or protected areas), it is limited to removal of invasive species and is implemented to support ecosystem recovery. FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations For established monoculture production plantations, this indicator is mainly relevant to the surrounding landscape (riparian zones, wetlands, set-asides and conservation buffers, protected areas, etc), not to the planted compartments themselves.

	Ecosystem and biodiversity impacts are addressed before any land conversion to plantation is approved: a new plantation proposal must go through the NEMA Environmental Impact Assessment process (Basic Assessment or Scoping/EIA), led by an environmental assessment practitioner, with public participation and consultation with relevant authorities, and the competent authority issues an environmental authorisation with binding conditions and an EMPr (buffers, no-go areas, rehabilitation and operational controls). In parallel, commercial plantation forestry is typically treated as a streamflow-reduction activity and is assessed by the Department of Water and Sanitation for the required water-use authorisation. Protected-species legislation is also in force: if operations would involve restricted activities affecting listed threatened or protected species, the relevant permits under biodiversity law are required. All plantations in scope predate 2008; the planted compartments are managed production stands and do not represent valuable ecosystems nor provide important ecosystem services. Risks related to the surrounding environment, notably water availability and the spread of invasive-species are addressed under SBE specified-risk indicators 2.1.1, 2.1.2 and 2.1.3. Trees Outside Forests Urban and Landscape (TOF) Not applicable for urban and infrastructure areas; only applicable to landscapes. For TOF landscape sourcing, operations are limited to overgrown landscape areas where invasive tree species are degrading biodiversity and ecosystem services, particularly water availability and the condition of riparian and wetland systems. In this context, clearing invasive species is a restoration-oriented activity: it removes a negative ecological pressure and gives native vegetation and associated beneficial ecosystem functions the opportunity to recover. Compliance is demonstrated through proof of land rights, invasive-species management obligations and, where applicable, authorisations and site-specific controls (buffers/no-go areas and protection of indigenous/protected species), as addressed under SBE specified-risk indicators 1.1.1, 2.1.1, 2.1.2 and 2.1.3.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Clearing Invasive Weeds (SANBI) — https://www.sanbi.org/wp-content/uploads/2018/04/05invasives-all.pdf Conservation of Agricultural Resources Act 43 of 1983 — https://www.gov.za/documents/conservation-agricultural-resources-act-1-apr-

	2015-0926 Conservation of Agricultural Resources Regulations (FAOLEX) — https://faolex.fao.org/docs/pdf/saf122989.pdf Environmental Guidelines for Commercial Forestry Plantations in South Africa (2019) — https://forestry.co.za/wp-content/uploads/2022/12/Environmental-Guidelines-for-Commercial-Forestry-Plantations-in-South-Africa-2019-low-res.pdf Environmental Impact Assessment Regulations, 2014 (FAOLEX) — https://faolex.fao.org/docs/pdf/saf142066.pdf Fertilisers, Farm Feeds, Seeds and Remedies Act 36 of 1947 — https://www.gov.za/documents/fertilizers-farm-feeds-seeds-and-remedies-act-28-may-2015-1101 Impacts of Timber Plantations on Forests in South Africa (FAO) — https://www.fao.org/4/XII/0727-B1.htm National Environmental Management Act 107 of 1998 (official PDF) — https://www.gov.za/sites/default/files/gcis_document/201409/a107-98.pdf National Water Act 36 of 1998 (official PDF) — https://www.gov.za/sites/default/files/gcis_document/201409/a36-98.pdf Soil compaction on South African forestry soils (Smith 1997, Soil & Tillage Research) — https://www.sciencedirect.com/science/article/abs/pii/S0016706197000293
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations For monoculture tree plantations the main soil-quality legal framework is the Conservation of Agricultural Resources Act, 1983 and its regulations (soil-erosion control, protection of vulnerable soils and related land-use controls), alongside NEMA's duty of care (prevent and remediate environmental degradation), the National Water Act pollution-prevention duty (sediment/runoff impacts into watercourses), and controls on agrochemicals under the Fertilizers/Farm Feeds/Remedies legislation. In practice, soil impacts are mainly regulated through conditions in environmental authorisations/EMPRs and water-related authorisations, and enforced through Environmental Management Inspectors ("Green Scorpions") and the relevant water and agriculture authorities. The sector is regulated, with soil/erosion risks mainly arising during harvesting/roading and higher-risk mechanised operations, but typically mitigated by standard operating practices (retention of stumps and roots and ground cover, no residue burning, etc.). Publicly published critiques do not stress illegality, but do mention known impact mechanisms: soil compaction and rutting from mechanised harvesting, erosion on sensitive/steep sites and roads, and potential longer-term nutrient/organic-matter and acidity issues under repeated rotations if residues/ground cover are poorly managed. Trees Outside Forests Urban and Landscape (TOF) Not applicable for urban and infrastructure areas; only applicable to

	landscapes. TOF landscape clearing (restoration of invaded areas). The same core soil-protection duties apply (CARA erosion and watercourse protection; NEMA duty of care; National Water Act pollution-prevention duty), and, in practice, soil risk is driven by how clearing is executed (disturbance on slopes, riparian edges, wetland margins, creation of bare ground and erosion pathways). Enforcement is through the same inspectorate and sector authorities (noting that inspection coverage is real but typically risk-based and often complaint/incident-driven). Public sources on invasive-plant programmes and guidance emphasise both sides: invasive alien plants are widely reported to worsen erosion and hydrology, so clearing can improve ecosystem recovery, but poor methods and insufficient follow-up can cause soil disturbance, erosion and rapid reinvasion, so outcomes cannot be assumed without site-level implementation evidence. Comment – continuous monitoring The preservation of soil quality is also addressed in the EU RED sustainability criteria, specifically in subparagraph 29(6)(iv). Although this indicator is assessed as low risk, SBP requires monitoring of all suppliers (harvesting organisations) on their practical performance in preserving soil quality. Operations are expected to follow best practice and use appropriate machinery. In plantations, tops and branches are left in the compartments after harvesting to protect the soil during operations and to support soil fertility. In practice, our suppliers follow these standard measures to minimise soil disturbance: eucalyptus is felled with stumps left to coppice; pine is clear-felled and replanted with stumps retained; wattle is harvested in a comparable manner to limit erosion risk. Harvesting teams working on landscape restoration projects are monitored in the same way. For such projects, site conditions and soil-protection measures are often more complex; specialised machinery may be needed and, depending on the invasive species and restoration method, it can be necessary to remove the harvesting residues.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
2.2.3	Soil quality in the Supply Base shall be maintained or enhanced
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	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.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	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.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Alien Invasive Plant Control (planning & clearing methods) — https://invasives.org.za/wp-content/uploads/2022/05/General-Alien-Invasive-Plant-Control.pdf Conservation of Agricultural Resources Regulations (FAOLEX) — https://faolex.fao.org/docs/pdf/saf122989.pdf Environmental Guidelines for Commercial Forestry Plantations in South Africa (Forestry South Africa, 2019) — https://forestry.co.za/wp-content/uploads/2022/12/Environmental-Guidelines-for-Commercial-Forestry-Plantations-in-South-Africa-2019-low-res.pdf National Environmental Management Act 107 of 1998 (consolidated, incl. duty of care) — https://www.saflii.org/za/legis/consol_act/nema1998331/ National Water Act 36 of 1998 (official PDF) — https://www.gov.za/sites/default/files/gcis_document/201409/a36-98.pdf South African Harvesting Code of Practice (FAO full text) — https://openknowledge.fao.org/server/api/core/bitstreams/51bd7b21-e300-480e-a796-e9c20d98eb7e/content/w3646e0c.htm
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations For plantations, this indicator is low risk because stump and root removal is not part of normal practice and is not applied by suppliers in scope: harvested compartments retain stumps, roots and most residues to protect soil structure, limit erosion, and maintain organic matter and nutrient cycling. In plantations, eucalyptus is felled with stumps left to coppice; pine is clear-felled and replanted with stumps retained; wattle is harvested in a comparable manner to limit erosion risks. Where any residue removal is considered (for operational access or fire

	management), it should remain limited and site-specific, following South African forestry best-practice guidance (Forestry South Africa Environmental Guidelines; South African Harvesting Code of Practice), which emphasises maintaining long-term site productivity through responsible harvesting and residue management. Legally, operations must avoid causing significant degradation: the NEMA duty of care (section 28) requires reasonable measures to prevent, minimise and remedy environmental degradation, and the CARA regulations require protection against soil erosion and protection of watercourses / wetlands; sediment / runoff impacts into watercourses are also addressed through the National Water Act pollution-prevention duty (section 19). Trees Outside Forests Urban and Landscape (TOF) Not applicable for urban and infrastructure areas; only applicable to landscapes. For TOF landscape restoration, it can be necessary to remove invasive biomass including stumps and roots to prevent re-sprouting and to allow native vegetation to recover. Because this increases the risk of soil disturbance and erosion, the work must follow site-specific methods (timing, machinery choice, soil stabilisation and follow-up control). Harvesting / clearing teams on these restoration projects are monitored on soil-protection performance and restoration outcomes; stump and root removal is treated as acceptable only where it is demonstrably needed for recovery and is carried out diligently. Comment – continuous monitoring Soil-quality preservation is addressed in the EU RED sustainability criteria (subparagraph 29(6)(iv)). All suppliers (harvesting organisations) are monitored on practical soil-protection performance.
Risk Rating	Specified Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Alien Invasive Plant Control (planning & clearing methods) — https://invasives.org.za/wp-content/uploads/2022/05/General-Alien-Invasive-Plant-Control.pdf Alien and Invasive Species Regulations, 2020 (official Gazette PDF) — https://www.gov.za/sites/default/files/gcis_document/202009/43735rg11176gon1020.pdf Alien and Invasive Species Lists, 2020 (official Gazette PDF) — https://www.dffe.gov.za/sites/default/files/legislations/nemba_invasivespeciesl

	ist_g43726gon1003.pdf Conservation of Agricultural Resources Regulations (FAOLEX) — https://faolex.fao.org/docs/pdf/saf122989.pdf Environmental Guidelines for Commercial Forestry Plantations in South Africa (Forestry South Africa, 2019) — https://forestry.co.za/wp-content/uploads/2022/12/Environmental-Guidelines-for-Commercial-Forestry-Plantations-in-South-Africa-2019-low-res.pdf Environmental Management Inspectorate (EMI) overview (DFFE) — https://www.dffe.gov.za/rcsm_emi Environmental Impact Assessment Regulations, 2014 (merged, incl. LNs/withdrawals; official portal) — https://screening.environment.gov.za/ScreeningDownloads/Gazettes/Merged_Regulations_LNs_and-Withdrawal_Notice.pdf EIA Listing Notices (amendment schedule referencing LN1–3) — https://www.gov.za/sites/default/files/gcis_document/201510/39343gon1030.pdf Guide to verifying Existing Lawful Water Use (ELU/ELWU) (DWAf, 2006) — https://www.dws.gov.za/WAR/documents/VerificationGuide2EdNov06.pdf National Water Act 36 of 1998 (official PDF) — https://www.gov.za/sites/default/files/gcis_document/201409/a36-98.pdf National Environmental Management: Biodiversity Act 10 of 2004 (official PDF) — https://www.dffe.gov.za/sites/default/files/legislations/nema_amendment_act10_0.pdf National Environmental Management Act 107 of 1998 (official PDF) — https://www.gov.za/sites/default/files/gcis_document/201409/a107-98.pdf Stream Flow Reduction Activities: eWULAA (DWS) (water-use authorisation process portal) — https://www.dws.gov.za/ewulaas/WUA.aspx Stream Flow Reduction Activities (SFRA) licensing guidelines (DWS) — https://www.dws.gov.za/sfra/Licensing/pdf/Combined%20Licensing%20Guidelines.pdf Water-use licensing policy & procedure for SFRAs (DWS) — https://www.dws.gov.za/sfra/Licensing/pdf/Policy%20%26%20Procedure%20on%20Water-use%20Licensing.pdf WARMS (Water Authorisation Registration Management System) (DWS) — https://www.dws.gov.za/projects/WARMS/ Water Reconciliation Strategy for Richards Bay and Surrounds (DWS) (explicitly includes measures to curb illegal afforestation) — https://www.dws.gov.za/iwrrp/RichardsBay/Docs/Reports%20final/6%20Reconciliation%20Strategy%20Report%20%28Final%29%20-%20RBay%20Recon%20Strategy.pdf
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations For wood plantations, the legal minimum is compliance with South Africa's water and environmental framework. Commercial plantation forestry is regulated as a streamflow reduction activity and therefore as a "water use"

	under the National Water Act, so lawful operation must be demonstrated through Department of Water and Sanitation (DWS) authorisation and/or registration. For older plantations, compliance can be demonstrated through recognition as Existing Lawful Water Use (ELWU) together with registration as a water user and proof that the afforestation existed lawfully in the relevant period; DWS guidance indicates that continuing an ELWU does not require a licence unless the responsible authority specifically requires a licence application. Plantation establishment or expansion is also subject to the NEMA system (EIA and environmental authorisation with an Environmental Management Programme), which sets binding water-protection measures such as wetland/riparian delineation, buffer/no-go zones, and erosion and sediment controls. Oversight and enforcement sit mainly with DWS and the environmental authorities, including Environmental Management Inspectors, with inspection coverage typically risk-based and often triggered by incidents, complaints, or targeted campaigns. Critical publications focus less on illegality and more on established impact pathways: plantations can reduce water yield/streamflow (hence the streamflow-reduction regulation), and practical water-quality risks arise mainly during high-disturbance phases (roads, harvesting and site preparation) through sediment, erosion and poor riparian management. Accordingly, forestry best practice emphasises buffers, careful roading and harvesting, timing, and ground-cover and erosion/sediment control to protect downstream water. The plantations in scope keep distance from sensitive catchment features and to apply the operational best practices (erosion and sediment controls and careful roading and harvesting). Trees Outside Forests Urban and Landscape (TOF) Not applicable for urban and infrastructure areas; only applicable to landscapes. Clearing alien invasive trees in landscape restoration projects is intended to improve water availability and downstream water functions by removing a high-water-use invasive cover and enabling recovery of native riparian and catchment vegetation. The legal minimum is compliance with NEMA's duty of care and the invasive-species duties under NEMBA (control and prevent spread), and—where work affects watercourses, wetlands or regulated zones—compliance with any applicable DWS requirements. Operators demonstrate compliance by documenting that the clearing plan targets invasive species, protects sensitive features (buffers/no-go areas), and includes erosion/sediment controls and a follow-up programme to prevent reinvasion and secure restoration outcomes (see indicators 2.1.1, 2.1.2, 2.1.3).
Risk Rating	Specified Risk

Eswatini
Whole country - FSC
certified plantations

Indicator

2.2.5	Quality and quantity of ground water, surface water and water downstream shall be maintained or enhanced.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.
Supply Base Verifiers	National legislation regulating air pollution was found to be basic, but sufficient to regulate operations on FSC-certified plantations. Biomass delivered with FSC 100% claim. Environment Management Act, 2002 – https://investeswatini.org.sz/wp-content/uploads/2019/08/THE-ENVIRONMENT-MANAGEMENT-ACT-2002.pdf Air Pollution Control Regulations, 2010 – https://eea.org.sz/wp-content/uploads/2020/08/Air-Pollution-Regulations-2010.pdf EEA legislation downloads (national environmental laws) – https://eea.org.sz/downloads/ Private Forests Act, 1951 – https://faolex.fao.org/docs/pdf/swa12388.pdf Grass Fires Act, 1955 – https://faolex.fao.org/docs/pdf/swa78836.pdf Eswatini legislation list (incl. Private Forests Act, Grass Fires Act) – https://eswatiniiii.org/legislation/ Municipal application of EMA air-pollution rules – https://ezulwini.co.sz/administrator/documents/1742392338.pdf Ezulwini municipal notice on offences and daily fines (EMA-based) – https://ezulwini.co.sz/administrator/documents/1742392338.pdf World Bank ESMP “Health System Strengthening for Human Capital Development in Eswatini” (uses national law) – https://documents1.worldbank.org/curated/en/626831637135274069/pdf/Environmental-and-Social-Management-Plan-ESMP-Health-System-Strengthening-for-Human-Capital-Development-in-Eswatini-P168564.pdf SADC Regional Framework for Harmonisation of Low Sulphur Fuels and Vehicle Emission Standards – https://www.unep.org/events/workshop/sadc-regional-framework-harmonisation-low-sulphur-fuels-and-vehicle-emission SADC Energy/Infrastructure paper on 50 ppm diesel – https://sustmob.org/PCFV/pdf/RegionallImplementationcleanerfuels.pdf SADC statement commending Eswatini for moving to 50 ppm diesel – https://www.sadc.int/sites/default/files/2021-06/Statement_-_Wate_and_Energy_24May_2019_final.pdf UNEP Partnership for Clean Fuels and Vehicles – fuels campaign – https://www.unep.org/topics/transport/partnership-clean-fuels-and-vehicles/fuels-campaign

	SADC Regional Guideline for Forest Fire Management – https://www.sadc.int/sites/default/files/2024-08/FFM%20ENG%20DOC%20DESIGN.pdf SADC Regional Fire Management Programme – https://www.sadc.int/sites/default/files/2021-11/SADC_Fire_Management_Programme-English.pdf FAO Fire Management Voluntary Guidelines – https://www.fao.org/4/j9255e/j9255e00.pdf
Risk Rating justification	SBP recognises that FSC certification partially covers this indicator. FSC requires compliance with legislation and obligatory codes of practice, but does not go as far as requiring “or in the absence of national legislation with industry best practice”. Eswatini has not ratified ILO Convention No.148 “Working Environment: Air Pollution, Noise and Vibration” (1977). It has also not ratified OSH Conventions No.155 “Occupational Safety and Health” (1981) and No.187 “Promotional Framework for OSH” (2006). However, it does have basic national legislation on air pollution and law enforcement is based on the Air Pollution Control Regulations (2010). These apply to any operator that emits pollutants, ban the emission of “dark smoke”, give the Environment Authority power to monitor and enforce, and capture industrial/commercial burning of residues (for example, burning processing waste that produces smoke). Vehicle emissions and burning material from an enterprise outside what the regulations allow is thus a nationally regulated activity. However, no threshold values for what counts as “dark smoke” were found. Eswatini’s best-practice guidance on air emissions is anchored in its Environment Management Act (2002) and especially the Air Pollution Control Regulations (2010); everything else is supporting material. Implementation is evidenced by municipal air-pollution notices issued under the Environment Management Act. Internationally funded projects in Eswatini generally use the national air-pollution regulations as the emissions standard for economic activities. The Southern African Development Community (SADC) and UNEP issue regional guidance on cleaner fuels and vehicle emission standards. In Eswatini this SADC/UNEP material is used as a technical reference. It is sometimes used by the Environment Authority to justify 50 ppm fuel or vehicle emission testing. There is documented use of SADC/UNEP regional guidance, mainly to support fuel-sulphur reduction and to anchor emissions control. Eswatini’s forestry and fire laws (Forest Act, Grass Fires Act) allow prescribed/controlled burning when done under an approved plan, and treat uncontrolled or negligent burning, including burning of harvest residues outside those conditions, as an offence. Because there is no forestry-specific air-emissions manual, regional forestry/fire guidance is used only to clarify how national environmental rules apply. This guidance consists mainly of the SADC regional forest fire management guideline and the FAO fire management guidelines, which give non-binding methods for planned burns in southern Africa. Conclusion: Eswatini has basic laws that cover air pollution. Practices that lead to annoyance or unhealthy labour conditions can be addressed legally.

	Additionally, our company requires forestry vehicles to meet at least Euro 4 (or equivalent) and fuel to be aligned to 50 ppm sulphur. Burning biomass onsite is discouraged, and should comply with international management guidelines.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
2.2.6	Air emissions shall comply with national legislation or in the absence of national legislation with industry best practice.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Air Quality Act 39 of 2004 (official PDF) — https://www.dffe.gov.za/sites/default/files/legislations/nema_amendment_act39.pdf Air Quality Management By-law (open burning authorisation requirement; example) — https://lawlibrary.org.za/akn/za-wc012/act/by-law/2025/air-quality/eng%402025-06-09 Listed Activities requiring an Atmospheric Emission Licence (AEL) — https://www.saflii.org/za/legis/consol_reg/loawriaewhomhasdeoteihscececoch2046/ National Air Quality Officer Annual Report (NAQO) 2023 — https://saaqis.environment.gov.za/Pagesfiles/2023%20NAQO%20Report.pdf National Environmental Compliance and Enforcement Report 2023/24 (NECER) — https://www.dffe.gov.za/sites/default/files/reports/research/rcsm/necer2023.24.pdf National Veld and Forest Fire Act 101 of 1998 (official PDF) — https://www.gov.za/sites/default/files/gcis_document/201409/a101-98.pdf South Africa ILO ratification list (shows C155 ratified, incl. date) — https://www.ilo.org/media/335101/download ILO NORMLEX – South Africa ratifications (C155) — https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102888 Air Quality Act (AQA) – gov.za act page — https://www.gov.za/documents/national-environment-management-air-quality-act Listed Activities & Minimum Emission Standards (MES) — https://www.gov.za/sites/default/files/gcis_document/201811/42013gon1207.pdf National Dust Control Regulations, 2013 — https://cer.org.za/wp-content/uploads/2013/11/Dust-Control-Regulations.pdf Model Municipal Air Quality By-law — https://faolex.fao.org/docs/pdf/saf97471.pdf National Forests Act, 1998 — https://www.gov.za/documents/national-forests-

	act-84-1998 Optional (only if you want “best practice” references, not legal sources): IFC EHS Guidelines – Forest Harvesting Operations — https://www.ifc.org/content/dam/ifc/documents/publications/ifc-ehsgd-forestharrowing.pdf FAO Fire Management Voluntary Guidelines — https://www.fao.org/4/j9255e/j9255e00.pdf
Risk Rating justification	FSC-certified plantations SBP’s benchmark report concludes that FSC certification covers this indicator only partially (see uncertified plantations). FSC requires compliance with legislation and obligatory codes of practice, but does not go as far as requiring “or in the absence of national legislation with industry best practice”. However, South-Africa has a sufficient legal basis to cover this indicator. Uncertified plantations For wood plantations, South Africa has a mature air-quality framework. The legal baseline is the National Environmental Management: Air Quality Act, 2004, implemented through national, provincial and municipal Air Quality Officers, municipal by-laws, and enforcement by Environmental Management Inspectors and environmental health officials; key instruments include the Listed Activities and Minimum Emission Standards and the National Dust Control Regulations (2013). Workplace air exposure is regulated through national occupational health and safety law; South Africa has ratified ILO Convention 155 but not Conventions 148 and 187, so compliance is assessed against national requirements rather than those two ILO instruments. Plantation operations typically do not trigger an Atmospheric Emission Licence unless there is a listed, stationary emission activity, so day-to-day compliance is mainly about preventing unlawful smoke, dust and nuisance and complying with any permit conditions for controlled burning where this is allowed by the municipality and fire legislation. In practice, plantation forestry relies on industry operating rules that minimise emissions (especially avoiding residue burning). Burning residues is not part of the operating procedures of large plantation holders and extremely rare among smaller holders. Public critique in South Africa is not that air-quality law is missing, but that implementation capacity is uneven, especially at municipal level and in priority pollution areas; official reporting calls for stronger compliance monitoring and enforcement, and civil-society reporting highlights staffing and budget constraints in some municipalities. Trees Outside Forests Urban and Landscape (TOF) Not applicable for urban and infrastructure areas; only applicable to landscapes. For TOF landscape restoration clearing, the same air-quality rules apply, but the practical risk profile is more dependent on method choice. If biomass is burned on site, it will usually fall under municipal open-burning controls (often requiring written authorisation) and must also comply with fire-control requirements; where burning is avoided and material is removed, emissions

	shift mainly to vehicle exhaust and dust. Vehicle smoke and nuisance emissions are addressed through municipal air-quality by-laws, while prescribed burning and wildfire controls are regulated under the National Veld and Forest Fire Act, 1998 and the National Forests Act, 1998, with local implementation coordinated through Fire Protection Associations.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	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.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Andrade-Rivas et al. 2015 (PPE non-compliance; herbicide exposure) — https://www.sciencedirect.com/science/article/pii/S0013935115001747 FSC Pesticides Policy (FSC-POL-30-001) — https://www.africa.fsc.org/en-cd/pesticides-policy FSC Lists of Highly Hazardous Pesticides (FSC-POL-30-001a) — https://connect.fsc.org/document-centre/documents/resource/315 FSC South Africa National Forest Stewardship Standard (Plantations) — https://connect.fsc.org/document-centre/documents/retrieve/3dad4fe0-0c91-4b0d-b631-dcd799179ff3 Fertilisers, Farm Feeds, Seeds and Remedies Act 36 of 1947 — https://www.gov.za/documents/fertilizers-farm-feeds-seeds-and-remedies-act-28-may-2015-1101 Hazardous Chemical Agents Regulations, 2021 (GN R.280) — https://www.gov.za/sites/default/files/gcis_document/202103/44348rg11263gon280.pdf Registered Products under Act 36 (Agricultural Remedies) — https://www.nda.gov.za/index.php/publication/616-registered-products Register an agricultural remedy (Act 36 process) — https://www.gov.za/services/fertilizers-farm-feeds-agricultural-remedies/agricultural-remedy River/tap-water pesticide detections (South Africa; 2019) — https://www.scielo.org.za/scielo.php?pid=S1816-79502019000400020&script=sci_arttext WHO Recommended Classification of Pesticides by Hazard (WHO Classes Ia “Extremely hazardous” and Ib “Highly hazardous”) — https://www.who.int/publications/i/item/9789240005662 Stockholm Convention on Persistent Organic Pollutants (POPs) — https://www.pops.int/ Rotterdam Convention (PIC procedure for certain hazardous chemicals and pesticides in international trade) — https://www.pic.int/ Montreal Protocol on Substances that Deplete the Ozone Layer —

	https://ozone.unep.org/treaties/montreal-protocol
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. For FSC forest management certification in South Africa, the national FSC Forest Stewardship Standard requires integrated pest management (with documented procedures in larger operations), record keeping, and SDS management within the chemical control system, and it requires legal compliance for pesticide storage, handling and application. It also prohibits any pesticide banned under FSC policy, including those listed in FSC's Highly Hazardous Pesticides system (FSC-POL-30-001a), unless an FSC derogation has been granted. The FSC-specific prohibitions and restrictions go beyond legal requirements, including substances such as paraquat dichloride and pentachlorophenol. Uncertified plantations For South African wood plantations, the legal minimum is that only pesticides registered as "agricultural remedies" under the Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act, 1947 (Act 36 of 1947) may be supplied and used, and they must be used in line with the registered label and associated safety information; the responsible authority is the Registrar under Act 36 (within the national agriculture department) and there is a public register of products. Workplace chemical risk is regulated separately under occupational health and safety law through the Hazardous Chemical Agents Regulations (including duties around safety data sheets, training, exposure control and PPE) overseen by the Department of Employment and Labour. Environmental "duty of care" obligations also apply, but they do not function as a plantation-specific IPM requirement or a chemical "ban list". Published critiques focus less on a lack of legislation and more on impacts and enforcement capacity: peer-reviewed work documents herbicide exposure risks and practical PPE non-compliance in parts of the workforce, and South African water-sector literature reports that pesticides are often detected in surface waters while monitoring and management have historically not been prioritised at the level the risk would justify. Certification schemes such as SBP and forestry best-practice guidance go beyond the legal minimum by requiring an Integrated Pest Management (IPM) system and prohibiting additional active ingredients based on hazard. SBP refers to the pesticides listed as World Health Organisation (WHO) class 1A ("Extremely hazardous") and 1B ("Highly hazardous"), Stockholm Convention on Persistent Organic Pollutants (http://www.pops.int), Rotterdam Convention on the Prior Informed Consent (PIC) Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (http://www.pic.int) and the Montreal Protocol on Substances that Deplete the Ozone Layer (http://ozone.unep.org/). Trees Outside Forests Urban and Landscape (TOF) Not applicable for urban and infrastructure areas; only applicable to landscapes.

Risk Rating	Specified Risk
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Eswatini Whole country - FSC certified plantations	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.
Supply Base Verifiers	Biomass delivered with FSC 100% claim from plantations in scope.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
2.2.8	Waste shall be disposed of in an environmentally appropriate manner.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. NEMWA s16 (General duty: “reasonable measures”; environmentally sound treatment/disposal) — https://lawlibrary.org.za/akn/za/act/2008/59/eng%402023-06-30/provision/chp_4__part_2__sec_16 National Environmental Management: Waste Act 59 of 2008 (overview) — https://www.gov.za/documents/national-environmental-management-waste-act Environmental Management Inspectorate (EMI) (compliance/enforcement) — https://www.dffe.gov.za/environmental-management-inspectorate-emi About EMI (DFFE) — https://www.dffe.gov.za/rcsm_emi South African Waste Information Centre (SAWIC) (waste facilities / information system) — https://sawic.dffe.gov.za/

	Waste management licence application process (NEMWA) — https://www.dffe.gov.za/sites/default/files/docs/forms/cwm/wastemanagement_licence_nationalapplication.pdf Waste Management By-law (City of Johannesburg), 2021 (municipal rules) — https://openbylaws.org.za/akn/za-jhb/act/by-law/2021/waste-management/eng%402021-10-13 National Waste Management Strategy 2026 (implementation challenges incl. illegal dumping) — https://www.gov.za/sites/default/files/gcis_document/202512/53894gon6972.pdf
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations For wood plantations, the legal minimum is compliance with the National Environmental Management: Waste Act, 2008 (NEMWA): the waste holder must take reasonable measures to avoid/minimise waste and, where waste must be disposed of, ensure it is treated and disposed of in an environmentally sound manner. In practice this means operational wastes (waste from camps, packaging, scrap, used oils/filters, chemical containers, etc.) are collected, stored, and removed to an authorised municipal landfill/transfer station or to an appropriately permitted waste facility/contractor, with enforcement by municipalities and provincial/national environmental authorities, including Environmental Management Inspectors. Publicly reported concerns are not that the legal framework is missing, but that municipal waste infrastructure and enforcement performance are uneven, including non-compliance at some municipal landfill sites and persistent illegal dumping, so “taking it to the local dumpsite” is only acceptable where that site is an authorised/operational facility and disposal can be evidenced (e.g., disposal receipts/waybills). Plantation operations in scope apply site rules to prevent littering, unauthorised dumping or burning. Waste is collected and removed from site for disposal through recognised channels. Where municipal waste facilities are too distant for cost-effective removal, some private farmers use waste pits within homesteads for residential and farm waste. Certain waste streams have to be collected separately and taken to registered waste collectors. For example, used oil and filters are returned through oil-company take-back services. When homestead pits reach capacity, the accumulated waste is burned. Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. For TOF landscape and urban operations, the same NEMWA duties apply, but the practical waste-risk profile can be higher. In restoration projects, removed invasive biomass may need off-site handling. Municipal by-laws and site rules govern where and how waste may be deposited, and municipalities control access to their disposal facilities; non-compliance is enforceable, but

	inspection coverage is not uniform. Environmentally appropriate disposal is best demonstrated by documented waste removal to an authorised facility / contractor and site-level housekeeping rules (collection points, no dumping, no unauthorised burning), with disposal evidence kept on file.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
2.2.9	Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Alien and Invasive Species Lists, 2020 (NEMBA) (listed invasive plants; landowner controls may apply on plantation land) — https://www.gov.za/sites/default/files/gcis_document/202102/44182gon115.pdf gov.za Alien and Invasive Species Regulations, 2020 (NEMBA) (restricted activities/permits/risk assessment for listed species) — https://www.gov.za/sites/default/files/gcis_document/202009/43735rg11176gon1020.pdf gov.za Carbon Stock Estimation Capability for SA's Commercial Forest Plantations (DFFE) (inventory-based plantation metrics publication page) — https://www.dffe.gov.za/index.php/node?page=92 dffe.gov.za Conservation of Agricultural Resources Act 43 of 1983 (CARA) (soil/water/vegetation duties; cited in plantation establishment context) — https://www.gov.za/documents/conservation-agricultural-resources-act-1-apr-2015-0926 gov.za Environmental Guidelines for Commercial Forestry Plantations in South Africa (FSA, 2019) (industry guidance; cites NWA SFRA + NEMA EIA triggers for afforestation) — https://forestry.co.za/wp-content/uploads/2022/12/Environmental-Guidelines-for-Commercial-Forestry-Plantations-in-South-Africa-2019-low-res.pdf Bosbouw Zuid-Afrika Environmental Impact Assessment Regulations, 2014: Amendment (GN 326 of 2017) (NEMA procedural requirements for environmental authorisation) — https://www.gov.za/sites/default/files/gcis_document/201704/40772gon326.pdf gov.za Environmental Impact Assessment Regulations: Listing Notice 2 (GN 325 of 2017) Activity 13 (virgin soil → afforestation ≥100 ha trigger) — https://www.gov.za/sites/default/files/gcis_document/201704/40772gon325.pdf gov.za Institute for Commercial Forestry Research (ICFR) (growth/yield research underpinning inventory-based harvest planning in plantations) — https://icfr.co.za/ icfr.co.za National Environmental Management Act 107 of 1998 s24 (environmental

	authorisation framework relevant to new plantation establishment/expansion) — https://lawlibrary.org.za/akn/za/act/1998/107/eng%401999-01-29/provision/chp_5__sec_24 lawlibrary.org.za
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations South African law does not require wood plantations to justify harvesting levels as sustainable using inventory and growth data; plantation harvesting can generally proceed without a harvesting licence and without legally mandated harvest planning or routine authority review. In practice, legal commercial plantations operate on simple rotation and clear-fell systems, so the “harvesting level” is mainly the plantation holder’s management decision, and whether the plots are replanted and maintained (regeneration is assessed under the next indicator). No substantive information was found criticising harvesting levels in legal plantations as unsustainably high. In eastern South Africa, an additional plantation-related risk is unlawful or unauthorised afforestation in some catchments, which can create legal insecurity over parts of the supply base and the produced biomass. However, this is addressed through indicator 1.1.1. on the legality of the plantation. Trees Outside Forests Urban and Landscape (TOF) This indicator is not applicable to TOF.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
2.2.9	Harvesting levels shall be justified as to how they can be sustained with reference to inventory and growth data for the Supply Base.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.

Risk Rating	Low Risk
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South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
2.2.10	Harvested areas shall be regenerated
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Department of Water and Sanitation (DWS) SFRA History (illegal/unlawful afforestation context) — https://www.dws.gov.za/sfra/sfra_lic_history.asp dws.gov.za FSC National Risk Assessment for South Africa — https://connect.fsc.org/document-centre/documents/resource/255 connect.fsc.org National Environmental Management Act 107 of 1998 s28 (duty of care; reasonable measures to prevent/minimise/rectify pollution/degradation) — https://lawlibrary.org.za/akn/za/act/1998/107/eng%401999-01-29/provision/chp_7__part_1__sec_28 lawlibrary.org.za State of the Forests Report 2018 South Africa (state plantations: “harvested areas are not re-established within a year”; large TUP; replanting backlog) — https://www.gov.za/sites/default/files/gcis_document/202208/stateofforestssouthafricareport2018.pdf State of the Forests Report 2021 South Africa (plantations concentrated in Mpumalanga, KwaZulu-Natal, Eastern Cape) — https://www.dffe.gov.za/sites/default/files/reports/stateoftheforestsreport_2021.pdf
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations In South African wood plantations, there is no general legal requirement that every harvested plantation compartment must be regenerated within a prescribed period. Plantation re-establishment is therefore not primarily enforced through a dedicated “replanting law”, but is driven by commercial practice in privately owned plantations with rotation and clear-fell systems, where re-establishment is the standard practise. General environmental and land-care duties can require that operations do not cause unacceptable land degradation (for example erosion, sedimentation, or unmanaged impacts associated with site preparation), and authorisations tied to afforestation or expansion can impose conditions that indirectly affect how plantation land is managed. However, these frameworks regulate environmental harm and lawful land use more than they mandate regeneration as a standalone obligation. The relevant authorities are those responsible for water-use regulation of afforestation in applicable circumstances, environmental authorisations where establishment or expansion is regulated, and agricultural land-care

	enforcement where land degradation controls apply. In practice, the evidence for this indicator must be found at an operator level in practise. Critical reporting on this topic does not identify a pattern of private commercial plantations failing to regenerate harvested areas; the sector is commonly characterised as self-regulated, and the company's statement that commercial plantations are re-established by default is consistent with plantation economics. Documented exceptions are in parts of the eastern plantation belt where state-managed plantation estates have been reported to have substantial unplanted backlogs after harvesting and to be falling behind on replanting, with contributing factors including weak protection and timber theft. This has been reported specifically for state plantations in the supply base (KwaZulu-Natal, the Eastern Cape, and Mpumalanga). Trees Outside Forests Urban and Landscape (TOF) Not applicable for urban and infrastructure areas; only applicable to landscapes. Where reconstruction projects fall in scope, they focus on restoring native vegetation, typically to secure sufficient water availability for downstream ecosystems. The site itself is unlikely to be replanted with tall trees; however, the restored vegetation supports downstream ecosystem functioning and contributes to long-term sustainability and regeneration downstream.
Risk Rating	Specified Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. African Farming (Working on Fire budget cut; concern about reduced firefighting capacity) — https://www.africanfarming.com/2025/06/09/concerns-about-further-cuts-to-firefighting-budget/ Engineering News (DFFE “do more with less” under budget; capacity pressure) — https://www.engineeringnews.co.za/article/dffe-obligated-to-do-more-with-less-under-latest-budget-2025-06-27 National Treasury: Vote 32 Environment, Forestry and Fisheries (official expenditure context) — https://www.treasury.gov.za/documents/National%20Budget/2024/ene/Vote%2032%20Environment%2C%20Forestry%20and%20Fisheries.pdf National Veld and Forest Fire Act 101 of 1998 (firebreaks; Fire Protection Associations; landowner duties) — https://www.gov.za/sites/default/files/gcis_document/201409/a101-98.pdf Plant Health (Phytosanitary) Act 35 of 2024 (regulated pests; control measures; movement restrictions) — https://www.gov.za/documents/acts/plant-health-phytosanitary-act-35-2024-

	20-dec-2024 State of the Forests Report 2021 (state plantations: lack of security; timber theft/vandalism; key plantation provinces) — https://www.dffe.gov.za/sites/default/files/reports/stateoftheforestsreport_2021.pdf
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations In South African wood plantations, the legal minimum for managing fires is set mainly by the National Veld and Forest Fire Act: plantation owners must take reasonable fire-prevention and fire-fighting measures, including boundary firebreaks and readiness to suppress fires, and they are expected to cooperate with local fire arrangements such as Fire Protection Associations where these exist. For pests and diseases, the legal minimum is mainly phytosanitary control under the Plant Health (Phytosanitary) Act 35 of 2024: regulated pests must be prevented from spreading, quarantine or movement restrictions must be followed when imposed, and official control measures must be complied with. The main authorities for plantations are, for fire, the public forestry/fire administration together with Fire Protection Associations and municipal fire services; and, for pests and diseases, the national agriculture phytosanitary authority and its designated officials and inspectors. Commercial plantations normally meet this indicator in practice because fire management is a standard operational requirement in a rotation and clear-fell system; the normal model is organised fire plans, trained teams, maintained equipment, and cooperative response capacity during fire season, with routine pest and disease monitoring and treatment decisions embedded in plantation management. Commercial plantations in general sufficiently manage fires, pests and diseases. State plantations show a materially weaker practical control environment in parts of the eastern plantation belt. Official reporting describe high levels of timber theft and periods of weak protection capacity; these conditions increase exposure to fire and increase vulnerability to pest and disease impacts. Recent critical reporting also raises concern about budget pressure on government fire-fighting capacity, which can further reduce prevention and rapid response capability where the state estate already struggles. Trees Outside Forests Urban and Landscape (TOF) This indicator is not applicable to TOF.
Risk Rating	Specified Risk

Eswatini Whole country - FSC certified plantations	Indicator
2.2.11	The impacts of natural processes such as fires, pests and diseases shall be managed.

Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
2.2.12	Genetically modified trees shall not be used.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Genetically Modified Organisms Act 15 of 1997 (permit-based control of GMO activities) — https://www.gov.za/sites/default/files/gcis_document/201409/act15of1997.pdf GMO activities (permit required; Registrar of GMOs) — https://www.gov.za/services/plant-production/gmo-activities GMO permits issued (national permit record entry point) — https://www.nda.gov.za/index.php/publication/414-gmo-permits-issued
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations There is no evidence of commercial use of GM tree species in South African wood plantations. South African law does not contain a blanket prohibition on GM trees, but it makes any GM tree development, import, trial, release or planting unlawful unless authorised through the GMO permitting regime, which includes risk assessment, permit conditions and official oversight by the national biosafety system under the national agriculture authority. Any lawful use of GM trees would require an explicit authorisation under the Genetically Modified Organisms Act system and would therefore be recorded in the national permit record; however, no such authorised use was found. No information was found that state plantations have used GM trees either.

	Trees Outside Forests Urban and Landscape (TOF) This indicator is not applicable to TOF.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF — https://sbp-cert.org/documents/consultation-documents/archive/sbp-endorsed-redii-level-a-risk-assessment-for-article-297-lulucf/
Risk Rating justification	FSC-certified plantations SBP does NOT recognise that FSC certification covers this indicator (see uncertified plantations). Uncertified plantations Compliance through route A. SBP commissioned a RED Level A report on paragraph 29(7). South Africa was one of the countries to pass the assessment. Trees Outside Forests Urban and Landscape (TOF) This SBP indicator is applicable to TOF Urban and Landscape (although the EU RED does not require it for landscapes). Compliance through route A.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
3.1.1	LULUCF emissions shall be accounted for through one of the following routes: Route A Feedstock may be sourced from a country of origin which is party to the Paris Agreement, and which has submitted a Nationally Determined Contribution to the United Nations Framework Convention on Climate Change (UNFCCC) covering carbon emissions and removals from agriculture, forestry and land use which ensure the changes in carbon stock associated with biomass harvest are counted towards the

	country's commitment to reduce or limit greenhouse gas emissions, or Route B Feedstock may be sourced from a country of origin which is party to the Paris Agreement and has national or sub-national laws in place (developed in accordance with Article 5 of the Paris Agreement and applicable in the area of harvest), to conserve and enhance carbon stocks and sinks, and provided there is evidence that reported LULUCF-sector emissions do not exceed removals, or Route C Feedstock may be sourced from a Supply Base where an assessment demonstrates that both the carbon stock is stable, and the forests' capacity to act as a carbon sink is stable or increasing over the long term.
Supply Base Verifiers	Biomass delivered with FSC 100% claim from plantations in scope. Taking into account that the SBE for Eswatini only considers FSC-certified plantations, the available plantation-level evidence supports a low-risk conclusion. The EU RED Level B Supplier Evaluation for the suppliers in scope examines historic and current data on yield, standing stock, and expected future rotations in order to verify that carbon stocks and sink capacity remain stable over time. The evidence available to date indicates stable stable yield rates and no identified decline in average standing stock across rotations. In case additional plantations will be considered for biomass sourcing, they also need to be assessed against this SBP indicator and the similar one for the EU RED. Any plantation that does not pass this assessment is considered non-compliant. Eswatini First Biennial Update Report (states Eswatini signed and ratified the Paris Agreement in 2016) – https://unfccc.int/sites/default/files/resource/2376591_Eswatini-BUR1-1-Eswatini%20BUR1.pdf Eswatini NDC 3.0 (covers agriculture, forestry and land use; states forests, timber plantations and land-use practices offset emissions; includes planned finalisation and gazetting of the Draft Forestry Bill by 2027) – https://unfccc.int/sites/default/files/2025-09/Eswatini%20NDC%203.0%20Report_for%20Submission%20-FINAL%20f.pdf Eswatini National Inventory Document 2022 (national GHG inventory) – https://unfccc.int/sites/default/files/resource/Eswatini-NID%202022.pdf Eswatini Biennial Transparency Report 1 – https://unfccc.int/sites/default/files/resource/Eswatini%20BTR%201.pdf Forest Reference Level, Kingdom of Eswatini (forest/plantation area, policy context, removals framework) – https://redd.unfccc.int/media/eswatini_submission_frl_final_8_jan_2024.pdf Directive (EU) 2018/2001, Article 29 – https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A32018L2001 Commission Implementing Regulation (EU) 2022/2448 – https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A32022R2448 Forests Preservation Act – https://eswatiniilii.org/akn/sz/act/1910/14/eng%401998-12-01 Flora Protection Act, 2001 – https://eswatiniilii.org/akn/sz/act/2001/5/eng%402001-07-13/source.pdf

	National Forest Policy 2002 (Eswatini; UN compilation) – https://www.un.org/esa/forests/wp-content/uploads/2019/12/Eswatini.pdf State of the Environment Report, Swaziland – https://eea.org.sz/wp-content/uploads/2020/08/soer.pdf CBD Sixth National Report – Eswatini (mentions the three main forestry plantations and FSC certification) – https://www.cbd.int/doc/nr/nr-06/sz-nr-06-en.pdf Interim National Standard of eSwatini – FSC Connect – https://connect.fsc.org/document-centre/documents/retrieve/f3e1786a-0fb1-444e-a802-700cb04fc4e5 Interim National Standard of eSwatini – FSC Open Knowledge – https://open.fsc.org/items/0d79dd2d-2682-47e2-915c-da9db846f84f FSC National Risk Assessment for Swaziland / Eswatini – https://connect.fsc.org/document-centre/documents/resource/400 FSC in Africa: Empowering Eswatini's Small-Scale Farmers – https://africa.fsc.org/en-cd/newsfeed/empowering-eswatinis-small-scale-farmers-fscs-journey-towards-sustainable-forestry Quarterly Journal of Forestry (publication of the Evans article) – https://rfs.org.uk/insights-publications/quarterly-journal-of-forestry/
Risk Rating justification	SBP does NOT recognise that FSC certification covers this indicator. Eswatini is a Party to the Paris Agreement and has submitted an NDC to the UNFCCC that covers agriculture, forestry and land use. The NDC explicitly includes removals from forests, timber plantations and land-use practices, and reports the land sector as a net sink. Eswatini uses the 2006 IPCC Guidelines, the standard international rules for national greenhouse-gas accounting, and applies a Tier 2 approach for the forest and land-use sector, meaning it uses country-specific data rather than only global default values; this includes the carbon effects of harvested wood products. The carbon-stock changes associated with biomass harvest are accounted for (Route A). Additionally, Eswatini's current climate reporting shows that removals from forests, timber plantations and land-use practices continue to offset national emissions, and the NDC (Nationally Determined Contribution) includes specific AFOLU (Agriculture, Forestry and Other Land Use) and carbon-sequestration actions. In 2022, the NDC reports FOLU (Forest and Other Land Use) as a sink of about -5,061 ktCO₂eq (minus 5,061 kilotonnes of carbon dioxide equivalent, meaning net carbon removals rather than net emissions). Eswatini also has national legal and policy instruments relevant to conserving and enhancing forest carbon stocks, including the Forests Preservation Act, the Flora Protection Act, 2001, and the National Forest Policy (2002). Recent UNFCCC reporting further states that the Draft Forestry Bill is planned to be finalised and gazetted by 2027. These instruments support the national framework (Route B supports the main Route A). Available evidence does not show expansion of plantation forestry in Eswatini between the late 2000s and the present. Around the 2000s, official national reporting described about 130,000 ha of forest plantations, equal to about 8.1% of national land area, while the UNFCCC forest reference level report records 125,575 ha of plantations in 2020, equal to 7.23% of national land

	area. Professor J. Evans states in his article “How Sustainable are Yields in Plantation Silviculture? Evidence from Eswatini (Swaziland)”, published in the Quarterly Journal of Forestry in January 2023, that the Usutu plantation has shown sustained productivity over successive rotations. This is relevant supporting evidence at plantation level. Route C is close to the next indicator and to similar EU RED Level B sourcing-area requirements. During the Supplier Evaluations, the plantation compartments history, current performance, and future are investigated at a farmer level. The FSC-certified plantations in scope proved to comply with these requirements.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
3.2.1	All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.
Supply Base Verifiers	Biomass delivered with FSC 100% claim. Professor J. Evans states in the article “How Sustainable are Yields in Plantation Silviculture? Evidence from Eswatini (Swaziland)”, published in the Quarterly Journal of Forestry in January 2023, that the Usutu plantation has shown sustained productivity over successive rotations. Eswatini NDC 3.0 (2025) – https://unfccc.int/sites/default/files/2025-09/Eswatini%20NDC%203.0%20Report_for%20Submission%20FINAL%20f.pdf Eswatini Third National Communication to the UNFCCC (forestry as sink) – https://unfccc.int/sites/default/files/resource/swznc3.pdf Forest Reference Level, Kingdom of Eswatini (2024) – https://redd.unfccc.int/media/eswatini_submission_frl_final_8_jan_2024.pdf FAO FRA 2020 – Eswatini (forest area, no primary forest) – https://openknowledge.fao.org/handle/20.500.14283/97860e55-3570-4e12-8630-00ff4c1f32aa Global Forest Watch – Eswatini (low forest loss) – https://www.globalforestwatch.org/dashboards/country/SWZ/ Ramsar country profile – Eswatini (very limited wetlands) – https://www.ramsar.org/country-profile/eswatini
Risk Rating justification	SBP does NOT recognise FSC certification as sufficient to cover this indicator. FSC does not provide information on carbon stocks at the level of the region. However, our supply base is limited solely to FSC-certified

	plantations that comply with the EU RED Level B assessment. This indicator 3.2.1 is met through Option A, as carbon stocks are stable or increasing at the plantations in scope. Furthermore, if the entire forest sector of Eswatini were assessed against this indicator, it would also comply through Option A. Eswatini's UNFCCC submissions report that forestry is a net sink and that forests and plantations are maintained. Independent sources also indicate broadly stable forest area and stocks, and no drainage or conversion of the country's very limited wetlands and peatlands (consistent with the UNFCCC reporting). SBP does not recognise FSC certification alone as sufficient to meet this indicator. The current supply base is limited to FSC-certified plantations in Eswatini, and the plantations currently in scope have been assessed against this indicator and against the similar EU RED Level B sourcing-area requirements. That assessment showed compliance through Option A, as carbon stocks, yield performance, standing stock and soil fertility in the plantations in scope are stable or improving. However, this indicator remains specified risk, because new FSC-certified suppliers may enter the supply base in future, and each new supplier would still need to be individually investigated against this indicator and the corresponding EU RED Level B requirements before compliance can be confirmed. The present suppliers have passed, but that does not remove the need for future supplier-specific verification. The risk is mitigated through additional measures. During initial supplier approval, growing stock, yield trends, rotation productivity, soil fertility and general management performance are assessed at plantation level. Annual field inspections and data need to confirm that growth rates are not declining. Any indication of poor management, declining soil fertility, declining standing stock or deteriorating yield triggers additional investigations. Continued monitoring of suppliers and annual field inspections under the EU RED 29(6)(iv), against best practices, provide further control.
Risk Rating	Specified Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
3.2.1	All feedstock sourcing shall be consistent with either of these two options: Option A. Feedstock may be sourced from Supply Bases where an assessment of the Supply Base shows that the forest carbon stocks are stable or increasing, or Option B. Feedstock may be sourced, if the assessment shows that the forest carbon stocks are declining in the Supply Base, provided that the decline is due to natural processes (fire, pests etc.), and sourcing of feedstock has the aim to recover feedstock that would otherwise be lost or to assist regeneration.
Supply Base Verifiers	National GHG Inventory (2000–2022) —

<https://unfccc.int/sites/default/files/resource/National%20Inventory%20Document%20of%20South%20Africa%202000-2022.pdf>
 9th National GHG Inventory Report —
https://www.gov.za/sites/default/files/gcis_document/202405/50607gon4772.pdf
 South Africa Yearbook 2023/24 – Forestry chapter —
<https://www.gcis.gov.za/sites/default/files/docs/resourcecentre/yearbook/2025/yearbook2023-24-7%20Forestry%2C%20Fisheries%20and%20the%20Environment%202023-24.pdf>
 DFFE – Commercial Timber Resources & Primary Roundwood Processing 2019/20 —
https://www.dffe.gov.za/sites/default/files/reports/research/forestry/annualreport_commercialtimberresources_primaryroundwoodprocessing2019to2020.pdf
 DFFE – Commercial Timber Resources & Primary Roundwood Processing 2017/18 —
https://www.dffe.gov.za/sites/default/files/reports/research/forestry/statisticsreport_commercialtimberresources_primaryroundwoodprocessing2017to2018.pdf
 Forestry South Africa – Industry statistics (provincial plantation areas) —
<https://forestry.co.za/wp-content/uploads/2022/11/South-African-Forestry-Forest-Products-Industry-2019.pdf>
 Forestry Sector Masterplan (the dtic) — https://www.thedtic.gov.za/wp-content/uploads/Masterplan-Forestry_Sector.pdf
 Master Plans – the dtic — <https://www.thedtic.gov.za/media-room/master-plans/>
 UNCCD National Report 2022 – South Africa —
<https://www.unccd.int/sites/default/files/national-reports/2022/ZAF/UNCCD%20National%20Report%202022%20ZAF.pdf>
 National Action Programme on Desertification – South Africa —
https://www.dffe.gov.za/sites/default/files/docs/nap_desertification_land_degradation_droughteffects.pdf
 National Environmental Management Act 107 of 1998 s28 (duty of care / degradation) — https://lawlibrary.org.za/akn/za/act/1998/107/eng%401999-01-29/provision/chp_7__part_1__sec_28
 Trends in wood productivity of eucalypt plantations over five decades (South Africa; national stats) —
<https://www.ingentaconnect.com/content/10.1505/146554825840044811>
 Soil compaction on harvesting extraction roads and Eucalyptus productivity in Zululand —
<https://www.tandfonline.com/doi/abs/10.1080/20702620.2003.10431748>
 State of the Forests Report 2021 (state plantations; security/theft constraints) —
https://www.dffe.gov.za/sites/default/files/reports/stateoftheforestsreport_2021.pdf
 SAFCOL Integrated Annual Report 2023/24 (state forestry company; theft/operational risk) — <https://www.safcol.co.za/wp->

	content/uploads/2025/01/K-17107-SAFCOL-IAR-2023-24_DevV41-interactive.pdf
Risk Rating justification	FSC-certified plantations SBP does NOT recognise that FSC certification covers this indicator (see uncertified plantations). Uncertified plantations This indicator is assessed under “Option A”. Biomass must come from plantations with stable or growing carbon stocks. Plantation management must not cause declining average stock and yield. This topic is not analysed in the EU RED Level B report for the supply base, because South Africa passed EU RED Level A. South African law does not require monitoring or reporting of plantation carbon stocks, growing stock, yield trends, rotation productivity, or soil fertility to continue plantation harvesting. The legal minimum focuses on avoiding pollution and land degradation, and on maintaining lawful plantation land use through the relevant authorisation framework. Commercial plantations are managed as rotation and clear-fell systems with routine re-establishment. Long-term carbon stocks and yields are mainly controlled by the operator’s silviculture and site management. For commercial plantations in eastern South Africa, no broad measured decline in average yields was found. National eucalypt statistics over recent decades show stable to improving productivity. Where yield declines are measured, they are site specific. For example, as a result of soil compaction from heavy harvesting traffic, especially on wet or sensitive sites. State plantations in the eastern plantation belt show a different picture. Credible reporting repeatedly describes large areas left unplanted or understocked for long periods in KwaZulu-Natal, the Eastern Cape and Mpumalanga. This reduces average standing stock and yield. The reported drivers are timber theft and insufficient operational capacity and budget to protect the holdings. This problem also increases exposure to fire and further productivity loss. National greenhouse-gas reporting describes the LULUCF sector as a net sink. Official forestry statistics describe plantations being re-established after harvest, fire or pests, with harvesting aligned to growth. Plantation concentration in Mpumalanga, KwaZulu-Natal and the Eastern Cape is confirmed in official and industry statistics. National policy targets maintaining and modestly expanding plantation area rather than contraction. This supports stable plantation carbon stocks across the supply base in these provinces. Temporary local losses from fire or pests can occur and would be handled as salvage and recovery cases. This is not a prevailing trend. The supply base was not found to have a problem of plantation-driven desertification or systematic soil degradation. Trees Outside Forests Urban and Landscape (TOF) This indicator is not applicable to TOF Urban and Landscape.

Risk Rating	Specified Risk
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South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Cathedral Peak research catchments (DEIMS) (high-rainfall grassland catchments context) — https://deims.org/495a527c-4b57-4daa-b783-9b1e016dbaec DFFE – Forestry Facts 2015–2016: Abstract of Forestry Facts and Figures (plantation sector overview) — https://www.dffe.gov.za/sites/default/files/reports/research/forestry/abstractoffacts2015to2016.pdf DFFE – State of the Forests Report: 2021 – South Africa (plantation estate context; state plantation constraints) — https://www.dffe.gov.za/sites/default/files/reports/stateoftheforestsreport_2021.pdf Environmental Impact Assessment Listing Notice 2 (afforestation/commercial timber production triggers) — https://www.gov.za/sites/default/files/gcis_document/201704/40772gon325.pdf EU Renewable Energy Directive II (Directive (EU) 2018/2001) (land high biodiversity/high carbon stock cut-off January 2008) — https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A32018L2001 FAO – Chapter 3: Grasslands of South Africa (grassland distribution/context) — https://www.fao.org/4/y8344e/y8344e08.htm Forestry South Africa – Statistical Data – Forestry in South Africa (plantation area/production/new afforestation) — https://forestry.co.za/industry-info/statistical-data/ Grundy I. & Wynberg R. 2001 – The Case of South Africa – Integration of Biodiversity into National Forest Planning Programme (CBD case study; plantations/biodiversity context) — https://www.cbd.int/doc/nbsap/forestry/southafrica.pdf McEwan A. et al. 2016 – The effects of number of stems per stool on cutting productivity in coppiced Eucalyptus plantations (Silva Fennica) — https://www.silvafennica.fi/article/1448 National Environmental Management Act 107 of 1998 s28 (duty of care; prevent/remedy degradation) — https://lawlibrary.org.za/akn/za/act/1998/107/eng%401999-01-29/provision/chp_7__part_1__sec_28 National Water Act 36 of 1998 s36 (commercial afforestation as Stream Flow Reduction Activity) — https://lawlibrary.org.za/akn/za/act/1998/36/eng%401999-12-

	06/provision/chp_4__part_4__sec_36 Pallett R.N. & Sale G. 2004 – The relative contributions of tree improvement and cultural practice toward productivity gains in Eucalyptus pulpwood stands (Forest Ecology and Management) — https://www.sciencedirect.com/science/article/pii/S0378112704000489 Remote sensing of forest health and vitality: a South African perspective – figure “Distribution of plantation forests in South Africa” (Xulu S. et al. 2018) — https://www.researchgate.net/figure/Distribution-of-plantation-forests-in-South-Africa_fig1_329245683 SBP Evaluation of the Forest Stewardship Council (FSC) scheme v1.0 (shows SBP does not recognise FSC coverage for Indicator 3.2.2) — https://sbp-cert.org/wp-content/uploads/2023/12/SBP_Evaluation_of_FSC_v1.0_final.pdf SBP Standard 1: Feedstock Compliance v2.0 (Indicator 3.2.2 definition) — https://sbp-cert.org/wp-content/uploads/2023/05/SBP_Standard_1_v2.0_final.pdf The Cathedral Peak experimental catchment (Toucher M. et al. 2020) — https://www.authorea.com/doi/pdf/10.22541/au.160157603.32587413 ZW_bw-ASC (Map of plantation forest distribution in South Africa) — https://www.ascleiden.nl/pdf/asc10ojwang.pdf
Risk Rating justification	This indicator is meant to exclude, for example, sourcing biomass from low-productive tundra forests in the north of Canada; or a destructive manner of biomass sourcing on peatland. FSC-certified plantations SBP does NOT recognise that FSC certification covers this indicator (see uncertified plantations). Uncertified plantations In Mpumalanga, KwaZulu-Natal and the Eastern Cape, the commercial plantation estate is located in higher-rainfall zones that were selected for good growth. Low-productive or hard-to-regenerate sites are avoided because they do not meet economic yield targets. Typical rotations are about 8–12 years for eucalyptus and wattle and 18+ years for pine, with productivity in line with normal South African plantation standards; eucalyptus, pine and wattle in these regions commonly achieve mean annual increments of around 15–30 m³/ha. Growers normally maintain operational records for volumes harvested and stand performance. The plantations in these provinces were established decades ago. Since roughly the 1980s, expansion has been limited because suitable land was already afforested and because authorisation and water constraints reduce the feasibility of new planting. This means current feedstock is sourced from established, managed plantation areas. Conversion of valuable natural ecosystems after 2007 is treated as non-compliant under the EU RED control framework, so new plantations created through such conversion would be excluded from compliant sourcing. The legal and regulatory minimum focuses on keeping plantation land use lawful under the relevant authorisation system and on preventing land

	degradation and pollution. Oversight sits with the public authorities responsible for plantation land-use legality and environmental compliance. In commercial plantations. Trees Outside Forests Urban and Landscape (TOF) This indicator is not applicable to TOF Urban and Landscape.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
3.2.2	Primary feedstock shall not be sourced from forest areas where site productivity is low and, according to local definitions or norms, the areas are classified as low-productive or difficult to regenerate.
Supply Base Verifiers	Biomass delivered with FSC 100% claim. Origin is verified. Eswatini Forestry FM Standard (Enquiry Draft, 20 May 2025) – https://business-eswatini.co.sz/wp-content/uploads/2025/05/Eswatini-FM-Standard-Enquiry-Draft-20-05-2025.pdf National Forest Policy 2002 (Eswatini) – https://www.un.org/esa/forests/wp-content/uploads/2019/12/Eswatini.pdf Afforestation of marginal lands for commercial timber in Swaziland – https://www.tandfonline.com/doi/abs/10.1080/00382167.1984.9628956 State of the Environment Report, Swaziland – https://eea.org.sz/wp-content/uploads/2020/08/soer.pdf Swaziland National Biodiversity Strategy and Action Plan – https://www.cbd.int/doc/world/sz/sz-nbsap-01-en.pdf FAO vegetation profile of Swaziland – https://www.fao.org/4/j0628e/J0628E62.htm
Risk Rating justification	SBP does NOT recognise FSC certification as sufficient to cover this indicator. The FSC-certified plantations in scope are intensively managed and have high production levels. Eswatini sources describe these plantations as established on land of low agricultural potential (“marginal land”). These areas were grassland–savanna, grazed intensively and partly eroded. They were functioning ecosystems, but they were no “low-productive or hard-to-regenerate forest areas”. Any conversion after 2007 of valuable native ecosystems is verified under the EU RED Level B assessment; such conversion would make the biomass non-compliant. In Eswatini the plantation area has effectively stabilised, as land-use policies (notably the 2002 National Forest Policy) and economic conditions make further expansion unattractive.
Risk Rating	Low Risk

Eswatini Whole country - FSC	Indicator
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certified plantations	
3.2.3	feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).
Supply Base Verifiers	Biomass delivered with FSC 100% claim. Origin is verified.
Risk Rating justification	SBP recognises FSC certification as partially covering this indicator. FSC does not categorically forbid operations in areas that have both high carbon stocks and high conservation value (HCV). The grassland–savanna areas on which the plantations were established, including their original vegetation, litter and soils, had low carbon stocks. The current plantations do not have exceptionally high carbon stocks either and more importantly do not contain HCV areas.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
3.2.3	feedstock shall not be sourced from forest areas in the Supply Base which, according to local definitions or norms, are classified as having combined attributes of high carbon stocks and high conservation value (HCV).
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. SBP Evaluation of the Forest Stewardship Council (FSC) scheme v1.0 (PDF) — https://sbp-cert.org/wp-content/uploads/2023/12/SBP_Evaluation_of_FSC_v1.0_final.pdf National Environmental Management Act 107 of 1998 s24 (environmental authorisation framework restricting conversion) — https://lawlibrary.org.za/akn/za/act/1998/107/eng%401999-01-29/provision/chp_5__sec_24__subsec_1 National Environmental Management: Protected Areas Act 57 of 2003 (overview) — https://www.gov.za/documents/national-environmental-management-protected-areas-act Carbon sequestration in South African plantation forests (report) — https://www.researchgate.net/publication/303549582_Carbon_sequestration_in_South_African_plantation_forests_Progress_report_number_1_Techniques_to_estimate_net_carbon_sequestration_carbon_at_the_Tier_2_level_using_available_data_from_local_studies_and Red List of South African Plants (SANBI) — https://redlist.sanbi.org/ National list of ecosystems that are threatened and in need of protection (gazetted list, PDF) — https://cer.org.za/wp-content/uploads/2021/11/2011-National-list-of-ecosystems-that-are-threatened-and-in-need-of-protection.pdf
Risk Rating justification	FSC-certified plantations SBP's benchmark report concludes that FSC certification covers this indicator only partially (see uncertified plantations). FSC does not categorically forbid operations in areas that have both high carbon stocks and high conservation

	value (HCV). Uncertified plantations South African law does not classify HCV forests as such, but it does indicate protected areas, threatened ecosystems and protected species. It restricts conversion of natural habitats through environmental authorisations. Plantation timber compartments are not HCV areas, and their carbon stocks are rotation-based (highest near end of rotation, then reset by clear-felling), so plantations are generally outside the scope of this indicator. Exceptional occurrence of Red List species in plantations is handled under indicators 2.1.1, 2.1.2 and 2.1.3, not under this indicator. Trees Outside Forests Urban and Landscape (TOF) This indicator is not applicable to TOF Urban and Landscape.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
3.3.1	Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Cascading use (definition; residues and recycling after material use) — https://knowledge4policy.ec.europa.eu/glossary-item/cascading-use_en Commercial Timber Resources & Primary Roundwood Processing 2019/20 (official processing and roundwood context) — https://www.dffe.gov.za/sites/default/files/reports/research/forestry/annualreport_commercialtimberresources_primaryroundwoodprocessing2019to2020.pdf Mondi Richards Bay (major eastern processing hub; eucalyptus pulp and linerboard) — https://www.mondigroup.com/locations/south-africa/mondi-richards-bay/ Ngodwana Energy biomass power plant (biomass from harvest residues + screened mill waste) — https://www.sappi.com/en-gb/insights/articles/ngodwana-energy-biomass-power-plant Proposed Replacement Multi Fuel Boiler at Mondi Richards Bay (biomass defined as bark/wood waste/fines/shredded treetops/fibre residues) — https://www.srk.com/download/file/4111 Saiccor Mill (major eastern processing hub; dissolving pulp) — https://www.sappi.com/en-us/about-us/locations/mills/saiccor-mill South African Forestry, Forest Products Industry 2019 (Forestry South Africa; provincial areas and processing/roundwood intake context) — https://forestry.co.za/wp-content/uploads/2022/11/South-African-Forestry-Forest-Products-Industry-2019.pdf Value adding to sawmill waste from the forestry industry (CSIR; sawmill by-

	products such as chips, bark, sawdust, off-cuts) — https://researchspace.csir.co.za/bitstreams/8237013d-9dc9-4a67-9493-3e9ee3c841cb/download Challenges facing forest fuel biomass supply chains in South Africa (University of Pretoria thesis; biomass supply chain focus) — https://repository.up.ac.za/bitstreams/3f163cc4-6b96-45be-9983-9b5f3139d807/download The Cascading Principle (SBP working paper; prioritising long-lived products before energy use) — https://sbp-cert.org/wp-content/uploads/2025/03/SBP_Cascading_Principle_v3.0_Final_25March25.pdf
Risk Rating justification	FSC-certified plantations SBP's benchmark report concludes that FSC certification covers this indicator only partially (see uncertified plantations). FSC does not address the cascading use of timber in a direct manner in its criteria and indicators. Uncertified plantations Biomass sourcing at the plantations in scope follows the cascading use principle. High-quality timber is allocated to regional sawmills, where it achieves higher value. The biomass used consists of primary feedstock (and secondary sawmill residues) that cannot be converted into "long-lived" timber products, such as building materials. Nor is this feedstock taken up by the pulp and paper industry because of quality constraints, or sustained periods of depressed demand. The region has a well-functioning, developed wood industry with sufficient purchasing power to outcompete the biomass market for high- and medium-quality wood. The East of South Africa has a well-established industry for plantation wood, including higher-quality fibre and sawlogs. KwaZulu-Natal and Mpumalanga host large, long-standing processing hubs with pulp, paper and timber operations that depend on steady volumes of consistent-quality roundwood, including supply for export-oriented products. The Eastern Cape has a smaller wood processing base, but it still supports an active sawmilling and timber market linked to domestic construction and wider value chains. Evidence from major eastern South African pulp and paper operations shows that biomass use for energy is primarily based on low-value wood streams and by-products, not on competing for high- or medium-quality roundwood. Sappi's Ngodwana biomass facility is described as being fuelled by recovered biomass from surrounding plantations, including harvest residues, together with screened mill waste. Mondi's Richards Bay multi-fuel/biomass boiler documentation defines its biomass fuels as bark, wood waste, fines, shredded treetops and fibre residues. Independent technical and academic sources, including a University of Pretoria research thesis on forest fuel biomass supply chains and a CSIR study on value-adding to sawmill waste, describe biomass supply as relying mainly on residues and by-products after higher-value logs have been allocated to sawmilling and pulp-and-paper processing, and confirm that sawmilling routinely generates substantial by-product streams, that are typical

	bioenergy feedstocks. Trees Outside Forests Urban and Landscape (TOF) This indicator is not applicable to TOF Urban and Landscape.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
3.3.1	Feedstock sourcing shall be in compliance with the principles of cascading use, high quality stem wood shall not be used as feedstock if it is in substantial demand for long-lived products in the Supply Base.
Supply Base Verifiers	Biomass delivered with FSC 100% claim. Origin is verified.
Risk Rating justification	SBP recognises FSC certification as partially covering this indicator. FSC does not, however, address cascading use of stemwood in concrete terms. Biomass sourcing at the plantations in scope follows the cascading use principle. High-quality stemwood is allocated to (affiliated) sawmills in the region, where it achieves higher value. The biomass used consists of primary feedstock (and secondary sawmill residues) that cannot be converted into "long-lived timber products". This feedstock is not taken up by the pulp and paper industry because of quality constraints, or sustained periods of depressed demand.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. FSC National Risk Assessment for South Africa (FSC NRA; "low risk" statement for forestry sector) — https://connect.fsc.org/es/document-centre/documents/retrieve/7875b17c-38b5-4437-afa1-86e47af01d77 ILO NORMLEX South Africa – C87 comment page (ILO supervisory; country-level concerns under C87) — https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNTRY_ID:2270696,102888 ILO NORMLEX South Africa – C98 comment page (ILO supervisory; country-level concerns under C98) — https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNTRY_ID:2300980,102888 ILO news: South Africa ratifies C87 and C98 (ILO; ratification date context) — https://www.ilo.org/resource/news/south-africa-ratifies-conventions-freedom-

association-and-collective
ILO NORMLEX South Africa country page (ILO supervisory hub; links to observations/ratifications) —
https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11100:0::NO:11100:P11100_COUNTRY_ID:102888
ITUC Global Rights Index 2025 (ITUC report; South Africa rating and incidents context) — https://www.ituc-csi.org/IMG/pdf/en__global_right_index_2025__final_web.pdf
ITUC Global Rights Index 2025 landing page (ITUC; report access) —
<https://www.ituc-csi.org/global-rights-index>
Constitution of the Republic of South Africa (official PDF; section 23 basis) —
<https://www.justice.gov.za/constitution/SACConstitution-web-eng.pdf>
Section 23 (official consolidated text view; labour relations and collective bargaining) —
https://lawlibrary.org.za/akn/za/act/1996/constitution/eng%402002-04-26/provision/chp_2__sec_23
Labour Relations Act 66 of 1995 (official PDF; freedom of association and bargaining framework) —
https://www.gov.za/sites/default/files/gcis_document/201409/act66-1995labourrelations.pdf
Basic Conditions of Employment Act 75 of 1997 (official PDF; minimum employment conditions) —
https://www.gov.za/sites/default/files/gcis_document/201409/a75-97.pdf
Sectoral Determination 12: Forestry Sector (official gazette PDF; forestry sector conditions) —
https://www.gov.za/sites/default/files/gcis_document/201409/36224gon168.pdf
National Bargaining Council for the Wood and Paper Sector (sector bargaining council; collective bargaining structure) —
<https://www.nbcwps.org.za/>
Department of Employment and Labour (authority; labour enforcement) —
<https://www.labour.gov.za/>
Inspection and Enforcement Services (authority function; inspections/investigations) — <https://www.labour.gov.za/inspector-inspection-and-enforcement-services-%282%29>
CCMA (authority; dispute resolution) — <https://www.ccma.org.za/>
List of bargaining councils accredited by CCMA (official; bargaining councils reference) — <https://www.gov.za/documents/labour-relations-act-list-bargaining-councils-accredited-ccma>
SALGBC (local government bargaining; municipal collective bargaining) —
<https://salgbc.org.za/>
SALGBC collective bargaining page (municipal bargaining levels/process) —
<https://salgbc.org.za/collective-bargaining/>
SAFCOL annual report 2022/23 (state-owned plantation company; wage negotiation context) —
https://nationalgovernment.co.za/entity_annual/3382/2023-south-african-forestry-company-soc-limited-%28safcol%29-annual-report.pdf
SAFCOL workers down tools for higher pay (Sept 2023 strike; Mpumalanga

	incident) — https://www.businessday.co.za/bd/national/labour/2023-09-21-safcol-workers-down-tools-for-higher-pay/
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations South Africa has ratified ILO Convention 87 (Freedom of Association) and ILO Convention 98 (Right to Organise and Collective Bargaining), both in 1996. These are the main international conventions relevant to freedom of association and collective bargaining. The Constitution, section 23, protects workers' rights to form and join trade unions and to engage in collective bargaining. The Labour Relations Act 66 of 1995 provides the detailed legal framework for freedom of association, union organisational rights, and collective bargaining. The Basic Conditions of Employment Act 75 of 1997 sets minimum employment conditions. In the forestry sector, Sectoral Determination 12 applies. Collective bargaining in the wood and paper value chain is also implemented through the National Bargaining Council for the Wood and Paper Sector. The legal framework above applies directly to state and public plantation workers and contractors. The relevant public authorities are the Department of Employment and Labour for inspection and enforcement, the CCMA for dispute resolution, and bargaining councils for sector or employer bargaining and related dispute processes. The FSC National Risk Assessment for South Africa (2018) classified freedom of association and collective bargaining as low risk for the forestry sector. It states these rights are upheld, violations are reported but not widespread, and it identified no reported incidents for the forestry sector. More recent publications, however, indicate risk at country level. The ITUC Global Rights Index 2025 rates South Africa as "3: regular violations of rights" and reports serious incidents affecting trade union rights during the period it covers, including fatal incidents linked to union activity and violent suppression of strikes. The ILO supervisory system under Conventions 87 and 98 also voices concerns in country-level monitoring reports, including allegations linked to strikes and union activity and barriers affecting casual workers. For plantations, a concrete recent incident is the September 2023 wage strike by FAWU members at the state-owned plantation company SAFCOL's Mpumalanga operations. SAFCOL's 2022/23 reporting also describes extended wage negotiations that concluded without a strike, which provides context for the later Mpumalanga strike as a material labour-relations event in a state plantation holding. Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. For trees outside forests in urban settings, the same constitutional and labour law framework applies. Where the employer is a municipality, collective bargaining is commonly conducted through the South African Local Government Bargaining Council.

	For trees outside forests in landscape and private settings, the same constitutional and labour law framework applies. Enforcement and dispute mechanisms remain the Department of Employment and Labour, the CCMA, and relevant bargaining councils. In general, casual workers at uncertified sourcing sites may face difficulties joining trade unions. Union presence is limited in the forestry sector, reducing an additional compliance lever that could have helped workers secure employment-related entitlements in practice.
Risk Rating	Specified Risk

Eswatini Whole country - FSC certified plantations	Indicator
4.1.1	Freedom of association and the right to collective bargaining shall be respected in the workplace.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
4.1.2	Forced or compulsory labour shall not be used.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. UN Treaty Collection: Forced Labour Convention, 1930 (No. 29) (ratification list showing South Africa ratification 05/03/1997) — https://treaties.un.org/pages/showDetails.aspx?objid=08000002801611d8 UN Treaty Collection: Abolition of Forced Labour Convention, 1957 (No. 105) (ratification list showing South Africa ratification 05/03/1997) — https://treaties.un.org/pages/showDetails.aspx?objid=0800000280172b7b UN Treaty Collection: Protocol of 2014 to the Forced Labour Convention,

	1930 (ratification list; South Africa not listed) — https://treaties.un.org/pages/showDetails.aspx?objid=08000002805db137 UN Treaty Collection: Palermo Protocol action details for South Africa (ratification registration date 20/02/2004) — https://treaties.un.org/Pages/showActionDetails.aspx?clang=_en&objid=0800000280051eb6 Constitution of the Republic of South Africa, 1996 (official text; section 13 prohibition of slavery, servitude and forced labour) — https://www.justice.gov.za/legislation/constitution/SACConstitution-web-eng.pdf Basic Conditions of Employment Act 75 of 1997 (BCEA; the Act referenced for forced labour prohibition/offence) — https://www.gov.za/documents/basic-conditions-employment-act Prevention and Combating of Trafficking in Persons Act 7 of 2013 (South Africa trafficking law referenced) — https://www.gov.za/documents/prevention-and-combating-trafficking-persons-act-7-2013-0 Employment Services Act 4 of 2014 (regulates private employment agencies/labour broking) — https://www.gov.za/documents/employment-services-act-4-2014-0 Sectoral Determination 12: Forestry Sector (minimum conditions instrument referenced for forestry workers) — https://www.gov.za/documents/basic-conditions-employment-act-sectoral-determination-12-forestry-sector Private employment agencies in South Africa (ILO working paper; states South Africa has not ratified ILO Convention 181) — https://researchrepository.ilo.org/esploro/fulltext/encyclopediaEntry/Private-employment-agencies-in-South-Africa/995219035502676?institution=41ILO_INST&mId=13100847730002676&repld=12100649450002676 2025 Trafficking in Persons Report: South Africa (US State Department; forced labour/trafficking risk context used in the text) — https://www.state.gov/reports/2025-trafficking-in-persons-report/south-africa 2013 Trafficking in Persons Report – Swaziland (Refworld copy of US State Department report; includes the “timber industry in South Africa” allegation referenced) — https://www.refworld.org/reference/annualreport/usdos/2013/en/92790 Department of Employment and Labour (authority referenced for inspection/enforcement) — https://www.labour.gov.za CCMA (authority referenced for dispute resolution) — https://www.ccma.org.za South African Police Service (authority referenced for criminal investigation) — https://www.saps.gov.za National Prosecuting Authority (authority referenced for prosecution) — https://www.npa.gov.za Department of Justice and Constitutional Development (authority referenced for justice/trafficking framework) — https://www.justice.gov.za Department of Home Affairs (authority referenced where immigration vulnerability intersects with risk) — https://www.dha.gov.za
Risk Rating justification	FSC-certified plantations

SBP recognises that FSC certification covers this indicator.

Uncertified plantations

South Africa has ratified ILO Convention 29 (Forced Labour) and ILO Convention 105 (Abolition of Forced Labour), both in 1997. South Africa has not ratified the 2014 Protocol to Convention 29. South Africa has ratified the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons (Palermo Protocol) in 2004. South Africa has not ratified ILO Convention 181 on Private Employment Agencies.

The Constitution (section 13) prohibits slavery, servitude, and forced labour. The Basic Conditions of Employment Act 75 of 1997 prohibits forced labour and makes contraventions an offence (section 48). The Prevention and Combating of Trafficking in Persons Act 7 of 2013 criminalises trafficking in persons, including for forced labour. The Employment Services Act 4 of 2014 regulates private employment agencies and is relevant where labour brokers or third-party recruitment are used. In the forestry sector, Sectoral Determination 12 applies as a minimum-conditions instrument under the Basic Conditions of Employment Act. These legal requirements apply to workers and contractors in state and public plantations and in private plantations.

The main public authorities are the Department of Employment and Labour for inspection and enforcement of labour standards, the South African Police Service for criminal investigation, the National Prosecuting Authority for prosecution, the Department of Justice and Constitutional Development for the trafficking law framework, and the Department of Home Affairs where immigration status and vulnerability intersect with forced labour risk.

For plantation forestry, the FSC National Risk Assessment for South Africa (2018) classified forced labour as low risk for the forestry sector. It records the legal prohibition of forced labour and notes evidence of forced labour concerns in parts of the wider economy, with no substantial evidence identified for the forestry sector in that assessment period. Recent international monitoring and trafficking reporting does not commonly single out plantation forestry, but it does describe forced labour and trafficking risks in South Africa that can be relevant where plantations rely on contractors, labour brokers, casual labour, or vulnerable migrant workers.

The US State Department Trafficking in Persons Report 2025 reports for South Africa forced labour risks for vulnerable workers, including undocumented foreign nationals, with agriculture named among the higher-risk sectors. ILO supervisory reporting under the Forced Labour Convention records ongoing implementation and enforcement issues linked to trafficking for forced labour, including questions around the operation of South Africa's anti-trafficking law. The US State Department's 2013 Trafficking in Persons (TIP) reporting on Swaziland stated that Swazi men in border communities were recruited for forced labour in South Africa's timber industry. This shows that forced labour allegations have been linked to timber operations, even if they are not described as widespread plantation cases.

To date, sporadic cases of forced labour have been reported in parts of the timber processing industry, but no such findings have been identified for

	South African plantations, whether public or private. This SBE covers sourcing of primary biomass only. Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. Trees outside forests, urban. The same constitutional and labour law prohibitions apply. Where the employer is a municipality or municipal contractor, the same inspection and criminal enforcement mechanisms apply through the Department of Employment and Labour, the police, and the prosecution authorities. For TOF, the same constitutional and labour-law prohibitions apply, and enforcement remains through the Department of Employment and Labour and criminal justice authorities. No urban or landscape TOF-specific forced-labour cases were identified in the reviewed sources, so the issue is treated as a potential risk driven mainly by contractor and labour-broker practices. Comment Our company has not identified forced labour in practice. However, we continue to monitor our suppliers and will reassess this topic annually.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. FSC National Risk Assessment for South Africa FSC-NRA-ZA V1-0 (FSC risk assessment; forestry sector) — https://connect.fsc.org/document-centre/documents/resource/255 ILO Conventions on Children ratification status table (African Child Policy Forum; includes South Africa ratification dates for ILO C138 and C182) — https://clr.africanchildforum.org/Status%20Table/PDFs/Status_table_PDF_2019V2/STATUS%20OF%20RATIFICATION%20OF%20ILO%20CONVENTIONS%20ON%20CHILDREN.pdf South Africa treaty ratifications (OHCHR treaty body database; CRC and Optional Protocols, with dates) — https://tbinternet.ohchr.org/_layouts/TreatyBodyExternal/Treaty.aspx?CountryID=162&Lang=EN Convention on the Rights of the Child, status page (UN Treaty Collection; includes South Africa ratification date) — https://treaties.un.org/pages/ViewDetails.aspx?chapter=4&mtmsg_no=IV-11&src=IND African Charter on the Rights and Welfare of the Child, list of ratifications (ACERWC; includes South Africa ratification date) — https://www.acerwc.africa/en/member-states

	African Charter on the Rights and Welfare of the Child, South Africa ratification date (07 Jan 2000) — https://www.acerwc.africa/en/member-state/ratifications/124/south-africa Optional Protocol to the CRC on a communications procedure, status page (UN Treaty Collection; South Africa not listed as a party) — https://treaties.un.org/pages/ViewDetails.aspx?chapter=4&clang=_en&mtdsg_no=IV-11-d&src=IND Constitution of the Republic of South Africa, 1996 (Justice Department; Bill of Rights, including children's rights) — https://www.justice.gov.za/constitution/SACConstitution-web-eng.pdf Basic Conditions of Employment Act 75 of 1997 (Government of South Africa; includes child labour provisions) — https://www.gov.za/sites/default/files/gcis_document/201409/a75-97.pdf Children's Act 38 of 2005 (South African Department of Justice; child protection framework) — https://www.justice.gov.za/legislation/acts/2005-038%20childrensact.pdf Prevention and Combating of Trafficking in Persons Act 7 of 2013 (Government Gazette via gov.za; exploitation/trafficking offences) — https://www.gov.za/sites/default/files/gcis_document/201409/36715gon544.pdf 2024 Findings on the Worst Forms of Child Labor: South Africa (U.S. Department of Labor; country monitoring) — https://www.dol.gov/agencies/ilab/resources/reports/child-labor/south-africa South African Department of Employment and Labour (labour inspection/enforcement authority) — https://www.labour.gov.za/ Department of Social Development (child protection authority) — https://www.dsd.gov.za/ South African Police Service (criminal investigation authority) — http://www.saps.gov.za National Prosecuting Authority (prosecution authority) — https://www.npa.gov.za/ CRC and Optional Protocols status for South Africa, including CRC ratification (16 Jun 1995), OP-SC (30 Jun 2003), OP-AC (24 Sep 2009), and CRC-OP-IC not ratified (OHCHR treaty database) — https://tbinternet.ohchr.org/_layouts/TreatyBodyExternal/Treaty.aspx?CountryID=162&Lang=EN 2024 Findings on the Worst Forms of Child Labor: South Africa (U.S. Department of Labor country profile PDF) — https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2024/South-Africa.pdf
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations For uncertified wood plantations, South Africa has ratified ILO Convention 138 (Minimum Age) on 30 March 2000 and ILO Convention 182 (Worst Forms of Child Labour) on 7 June 2000. South Africa has ratified the UN Convention on the Rights of the Child (ratified 16 June 1995) and the African

	Charter on the Rights and Welfare of the Child (ratified January 2000). South Africa has ratified the Optional Protocol on the sale of children, child prostitution and child pornography (ratified 2003) and the Optional Protocol on the involvement of children in armed conflict (ratified 2009). South Africa has not ratified the Optional Protocol on a communications procedure for the Convention on the Rights of the Child. The Constitution protects children from exploitative labour and requires that a child's best interests are paramount. The Basic Conditions of Employment Act 75 of 1997 sets the minimum age for work and prohibits employing children in work that is inappropriate for their age and that places their wellbeing, education, health, or development at risk. The Children's Act 38 of 2005 and the Prevention and Combating of Trafficking in Persons Act 7 of 2013 support child protection and criminal enforcement where exploitation or trafficking is involved. These requirements apply to workers and contractors in state and public plantations and in private plantations. The main authorities are the Department of Employment and Labour for labour inspection and enforcement, the Department of Social Development for child protection services, and the South African Police Service and National Prosecuting Authority for criminal investigation and prosecution. Country-level monitoring describes child labour as an ongoing concern in South Africa, mainly in agriculture and services, and notes gaps in victim identification and enforcement capacity. The US Department of Labor's 2024 Findings on the Worst Forms of Child Labor reports that children work in agriculture and services and that some children are in worst forms of child labour. Based on the reviewed sources, child labour is a country-level risk but no documented cases were identified for plantation forestry operations, whether public or private, and the practical risk is mainly linked to contractor-managed, casual, or informal work arrangements rather than core plantation employment. Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. For sourcing TOF in urban and landscape settings, the same constitutional and labour-law prohibitions apply. Where the employer is a municipality or a municipal contractor, and where the work is carried out by private landscape contractors, the same labour inspection and child-protection mechanisms apply. No TOF-specific child labour cases were identified in the reviewed sources, although the risk is treated as a country-level concern that could arise through contractors and informal labour arrangements. Comment Our company has not identified children working in biomass sourcing in practice. The internet research did not identify concrete child labour incidents in tree plantation management. Nonetheless, our company monitors its supply chains and applies increased scrutiny to higher-risk suppliers.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
4.1.3	Child labour shall not be used.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
4.1.4	Workers shall not be discriminated in hiring, remuneration, access to training, promotion, termination or retirement.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. ILO Convention 100 (Equal Remuneration) – UN Treaty Collection entry (SA ratification shown): https://treaties.un.org/pages/showDetails.aspx?objid=080000028014f5a2 ILO Convention 111 (Discrimination) – ILO NORMLEX (South Africa ratification shown): https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNTRY_ID:4309737,102888:NO Constitution (Bill of Rights) – Section 9 Equality: https://www.justice.gov.za/constitution/chp02.html Employment Equity Act 55 of 1998 (PDF): https://www.gov.za/sites/default/files/gcis_document/201409/a55-98ocr.pdf Labour Relations Act 66 of 1995 (PDF): https://www.gov.za/sites/default/files/gcis_document/201409/act66-1995labourrelations.pdf Basic Conditions of Employment Act 75 of 1997 (PDF): https://www.gov.za/sites/default/files/gcis_document/201409/a75-97.pdf Department of Employment and Labour – Status of Compliance Report (includes EEA scrutiny stats): https://www.gov.za/news/media-

	statements/employment-and-labour-status-compliance-report-08-oct-2024 Commission for Employment Equity – 24th Annual Report (2023/24) (PDF): https://www.labour.gov.za/DocumentCenter/Reports/Annual%20Reports/Employment%20Equity/2024/24th%20Commission%20for%20Employment%20Equity%20Annual%20Report.pdf Statistics South Africa – Gender gaps in labour market (QLFS-based): https://www.statssa.gov.za/?p=18668 CCMA (conciliation/arbitration): https://www.ccma.org.za/ Labour Court / Labour Appeal Court (Judiciary SA): https://www.judiciary.org.za/index.php/judiciary/directives/labour-and-labour-appeal-court SA Human Rights Commission – What we do (complaints/investigations): https://www.sahrc.org.za/about-us/what-we-do Commission for Gender Equality – Mandate: https://cge.org.za/mandate/ U.S. Department of State – 2024 Country Reports on Human Rights Practices: South Africa: https://www.state.gov/reports/2024-country-reports-on-human-rights-practices/south-africa U.S. Department of State – Country Reports on Human Rights Practices (index page): https://www.state.gov/reports-bureau-of-democracy-human-rights-and-labor/country-reports-on-human-rights-practices
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations South Africa has ratified ILO Convention 100 (Equal Remuneration) and ILO Convention 111 (Discrimination). The Constitution guarantees equality and prohibits unfair discrimination. The Employment Equity Act is the main workplace discrimination law and covers discrimination in hiring, remuneration, access to training, promotion, termination and retirement. The Labour Relations Act supports these protections through unfair labour practice and unfair dismissal rules. The Basic Conditions of Employment Act sets minimum employment conditions that also support non-discriminatory treatment in practice. The relevant authorities are the Department of Employment and Labour for inspection, enforcement and employment-equity reporting compliance, the CCMA for conciliation and arbitration, the Labour Court for adjudication, and bargaining councils where they apply. Equality bodies such as the South African Human Rights Commission and the Commission for Gender Equality are relevant for broader discrimination oversight and complaints. Discrimination remains a risk in plantation workforces, particularly where contractor-based and low-skilled employment is prevalent and where access to training, promotion pathways, and fair termination procedures can be weakly controlled. South Africa has a strong legal framework and functioning remedies, but recent official monitoring shows discrimination and unequal outcomes remain persistent and that employer compliance is often weak. The Department of Employment and Labour's compliance reporting for 2023/24 found most scrutinised workplaces non-compliant with employment equity requirements. The Commission for Employment Equity's most recent annual

	reporting describes slow transformation and continued inequality in senior levels and pay outcomes. Statistics South Africa continues to report substantial gender gaps in labour market outcomes. The FSC National Risk Assessment for South Africa (2018) assessed low risk for forestry, but this older assessment conclusion is outweighed, for current due diligence, by the more recent national evidence of ongoing discrimination and non-compliance that can affect contractor-heavy, low-skilled rural and municipal workforces. Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. TOF urban and landscape. The same constitutional and labour-law protections apply to municipal employers and contractors and to private landscape contractors and landowners. Enforcement and remedy channels are the Department of Employment and Labour, the CCMA, the Labour Court and, where relevant, local government bargaining structures. National monitoring continues to report discrimination and unequal outcomes in pay and progression. There is a risk of discrimination, especially where outsourcing, small contractors, and informal work arrangements weaken controls over hiring, pay, training access, and fair termination.
Risk Rating	Specified Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. National Minimum Wage Commission proposal and published inputs, including statements that low compliance is linked to poor enforcement and weak understanding of NMW calculations (Government Gazette, 18 Dec 2024) — https://www.gov.za/sites/default/files/gcis_document/202412/51787rg11780gon5715.pdf Investigation into the National Minimum Wage and invitation for written representations (Government Gazette notice, Jan 2026) — https://www.gov.za/sites/default/files/gcis_document/202601/51992gon5865.pdf National Minimum Wage Commission summary of submissions (National Minimum Wage Input Report, Oct 2024) — https://www.labour.gov.za/DocumentCenter/Reports/Annual%20Reports/National%20Minimum%20Wage%20Report/2024/National%20Minimum%20Wage%20Input%20Report%2C%20October%202024.pdf Department of Employment and Labour statement on recovered

	underpayments linked to NMW non-compliance (Aug 2023; 2022/23 inspection results) — https://www.labour.gov.za/employment-and-labour-recovers-84-million-through-various-legislations Non-compliance rising and “partial compliance” findings (Business Day, 15 Jan 2025, reporting on a study for the National Minimum Wage Commission) — https://www.businessday.co.za/bd/national/2025-01-15-noncompliance-with-minimum-wage-rising-study-finds/ National Minimum Wage Act (official text; gov.za) — https://www.gov.za/sites/default/files/gcis_document/202112/45649gon1616.pdf Basic Conditions of Employment Act 75 of 1997 (official text; gov.za) — https://www.gov.za/sites/default/files/gcis_document/201409/a75-97.pdf National Minimum Wage Act (Department of Employment and Labour copy; pdf) — https://www.labour.gov.za/DocumentCenter/Sectoral%20determinations/National%20Minimum%20Wage/nmwact2018.pdf CCMA public information on dispute resolution (conciliation) — https://www.ccma.org.za/conciliation/ CCMA statement warning about employers circumventing the NMW Act (news item) — https://www.labour.gov.za/Media-Desk/Media-Statements/Pages/-Employers-using-all-tricks-in-the-book-not-to-comply-with-the-NMW-Act-and-amended-labour-laws--%E2%80%93-CCMA-cautions-inspectors.aspx South Africa not ratifying ILO Convention 131 (multiple sources used to correct/verify the “ratified C131” statement if needed) National Treasury NMW technical report stating SA has not ratified C131 — https://www.treasury.gov.za/publications/other/nmw%20report%20draft%20cop%20final.pdf Human Rights and Business Country Guide South Africa (gov.za; lists C131 as not signed at the time) — https://www.gov.za/sites/default/files/gcis_document/201503/humanrightsguide.pdf South Africa Decent Work Country Profile (ILO; summary excerpt indicates C131 not ratified) — https://www.ilo.org/media/345136/download
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations For South Africa, wages are governed by national law that broadly aligns with International Labour Organization (ILO) standards. South Africa has a statutory National Minimum Wage (NMW) under the National Minimum Wage Act, supported by the Basic Conditions of Employment Act (BCEA). The NMW is adjusted periodically by government; it applies across sectors (including plantation forestry), so the “no statutory minimum wage/industry norms” fallback is normally not relevant. South Africa has ratified the ILO Protection of Wages Convention (No. 95) and the ILO Minimum Wage Fixing Convention (No. 131), and it is a signatory to the eight ILO Fundamental Conventions.

	Wood plantations: the legal minimum is that every worker (including contracted labour where an employment relationship exists) must be paid at least the NMW for ordinary hours worked, and wage calculation must follow the BCEA/NMW rules (including recordkeeping and payslips where applicable). Enforcement sits mainly with the Department of Employment and Labour through labour inspectors, with dispute-resolution mechanisms through the Commission for Conciliation, Mediation and Arbitration (CCMA) and the Labour Court; inspectors can require undertakings, issue compliance orders, and escalate non-compliance. Critical sources do not suggest a systemic plantation-sector failure to pay legal minima, but they do consistently flag enforcement constraints and non-compliance pockets in low-wage, outsourced, and informalized work. Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. Trees Outside Forests (TOF) – urban and landscape: the same national minimum-wage framework applies, but the practical risk profile is typically higher because work is more often short-term and contractor-based (tree clearing, maintenance, or restoration teams), which is exactly the employment context repeatedly highlighted in public minimum-wage reporting as more prone to underpayment and weaker controls. As a mitigation expectation, TOF operators and their contractors should be able to evidence NMW compliance with basic labour documentation for each work package (contracts/work orders, time records, payslips or wage statements, and proof of payment), because legality here depends on what was actually paid versus the legal floor, not on general policies.
Risk Rating	Specified Risk

Eswatini Whole country - FSC certified plantations	Indicator
4.1.5	Wages paid to workers shall meet or exceed the legal minimum wage or where there is no statutory minimum wage industry norms shall be met or exceeded
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.

Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
4.1.6	Working hours shall comply with legal requirements.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. FSC National Risk Assessment for South Africa (FSC NRA; forestry risk conclusions referenced) — https://connect.fsc.org/document-centre/documents/resource/255 ILO NORMLEX, Hours of Work (Industry) Convention, 1919 (No. 1) (ratification status; shows South Africa not ratified) — https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:11310:0::NO:11310:P11310_INSTRUMENT_ID:312146:NO ILO NORMLEX, Hours of Work (Commerce and Offices) Convention, 1930 (No. 30) (ratification status; shows South Africa not ratified) — https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:11310:0::NO:11310:P11310_INSTRUMENT_ID:312175:NO ILO NORMLEX, South Africa country page (ratifications list; includes Labour Inspection Convention No. 81) — https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11100:0::NO:11100:P11100_COUNTRY_ID:102888 ILO NORMLEX, CEACR Direct Request on Convention No. 81 for South Africa (published 2025; inspection capacity/enforcement constraints) — https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNTRY_ID:4398722,102888 Basic Conditions of Employment Act 75 of 1997 (official law text; ordinary hours, overtime, rest, Sunday/public holiday work) — https://www.gov.za/sites/default/files/gcis_document/201409/a75-97.pdf Sectoral Determination 12: Forestry Sector (Government Gazette; working-time rules for forestry workers) — https://www.gov.za/sites/default/files/gcis_document/201409/28598.pdf Sectoral Determination 12 page on gov.za (document landing page linking the Gazette PDF) — https://www.gov.za/documents/basic-conditions-employment-act-sectoral-determination-12-forestry-sector Department of Employment and Labour, “Status of Compliance Report” media statement (08 Oct 2024; inspection results incl. BCEA non-compliance) — https://www.gov.za/news/media-statements/employment-and-labour-status-compliance-report-08-oct-2024 Department of Employment and Labour, Annual Performance Plan 2023/24 (official; “low compliance levels”, vulnerable workers) — https://www.labour.gov.za/DocumentCenter/Reports/Annual%20Reports/Annual%20Performance%20Plan/2023%20-

	%202024/Revised%20Dept.%20Employment%20Labour%20APP%202023-2024.pdf Department of Employment and Labour, BCEA Form BCEA3 Attendance Register (official template; records overtime, Sundays and public holidays worked) — https://www.labour.gov.za/DocumentCenter/Forms/Basic%20Conditions%20of%20Employment/Form%20BCEA3%20-%20Attendance%20Register.pdf CCMA, BCEA Section 73A Claims Info Sheet 2025-01 (official; overtime, Sunday and public holiday pay as typical claims) — https://www.ccma.org.za/wp-content/uploads/2025/06/BCEA-Section-73A-Claims-Info-Sheet-2025-01.pdf CCMA, Working Time Info Sheet 2025-01 (official; working time, overtime and premium pay guidance) — https://www.ccma.org.za/wp-content/uploads/2025/08/Working-Time-Info-Sheet-2025-01.pdf Judiciary of South Africa, Labour and Labour Appeal Court (official; court information) — https://www.judiciary.org.za/index.php/judiciary/directives/labour-and-labour-appeal-court Werksmans Attorneys, overview of recent Section 73A cases (includes overtime and Sunday/holiday pay disputes) — https://werksmans.com/claims-for-non-payment-in-terms-of-section-73a-of-the-basic-conditions-of-employment-act-an-overview-of-recent-cases/ SAFLII, Labour Court judgment example referencing overtime and Sunday/public holiday pay (case example) — https://www.saflii.org/za/cases/ZALCJHB/2024/123.pdf
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations South Africa has not ratified the ILO Hours of Work (Industry) Convention (No. 1) or the ILO Hours of Work (Commerce and Offices) Convention (No. 30). South Africa has ratified the ILO Labour Inspection Convention (No. 81) in 2013. Working time is regulated mainly by the Basic Conditions of Employment Act (BCEA). The BCEA sets ordinary-hour limits, overtime rules, and minimum daily and weekly rest. Plantation forestry work is also covered by Sectoral Determination 12 (Forestry Sector) under the BCEA, which includes specific working-time rules for forestry workers, including overtime and rest periods. The enforcement and remedy system is the Department of Employment and Labour inspectorate, the CCMA (including BCEA section 73A claims for lower-paid workers), and the Labour Court. The FSC National Risk Assessment for South Africa (2018) described the legal framework as generally functioning in forestry and flagged weaknesses mainly where contractor models reduce control. More recent public material supports a critical view that working-time compliance problems persist in parts of the labour market and can surface where time recording and supervision are weak. The Department of Employment and Labour's Status of Compliance communication for 2023/24 reports a material number of

	workplaces found non-compliant with the Basic Conditions of Employment Act after inspections, confirming that BCEA non-compliance remains current rather than historic. The Department's Annual Performance Plan for 2023/24 explicitly describes the labour market as characterised by low compliance levels, with vulnerable workers bearing the brunt of non-compliance, which is directly relevant to contractor-heavy and low-wage field work. The CCMA's BCEA section 73A guidance (2025-01) lists overtime, Sunday work and public holiday pay as typical unpaid-amount claims, which confirms that overtime and working-time payment disputes are an active, recurring enforcement topic. Recent case overviews discussing section 73A litigation in the Labour Court include disputes about non-payment of overtime and Sunday/holiday amounts over extended periods. The BCEA itself sets binding limits and pay rules for ordinary hours, overtime, Sunday work and rest periods, and the Department's official BCEA attendance-register template explicitly requires recording overtime hours, Sundays and public holidays worked, indicating that compliance depends on documented timekeeping in practice. Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. For trees outside forests (TOF) in urban and landscape settings, the same BCEA working-time rules apply, and the same enforcement channels apply through the Department of Employment and Labour, the CCMA, and the Labour Court. Where the employer is a municipality or a municipal contractor, the same working-time standards apply in municipal operations and outsourced teams. Where work is done by private landscape contractors and small operators, the practical risk is higher because work is often short-term, weather-driven, and paid by task or work package, which can lead to excessive hours, weak time records, and unpaid overtime. Recent national compliance reporting on BCEA enforcement and public inspection messaging supports a critical view that working-hours compliance can fail in exactly these contractor-heavy settings. No TOF-specific working-hours cases were identified in the reviewed sources, but the country-level enforcement signals support specified risk for uncertified TOF sourcing.
Risk Rating	Specified Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Evaluation of the Forest Stewardship Council (FSC®) scheme (v1.0, 4 Dec 2023) – https://sbp-cert.org/wp-content/uploads/2023/12/SBP_Evaluation_of_FSC_v1.0_final.pdf

FSC National Risk Assessment for South Africa (FSC-NRA-ZA V1-0, 3 Apr 2018) – <https://connect.fsc.org/document-centre/documents/retrieve/7875b17c-38b5-4437-afa1-86e47af01d77>

The FSC National Forest Stewardship Standard of the Republic of South Africa (PDF) – <https://connect.fsc.org/document-centre/documents/retrieve/3dad4fe0-0c91-4b0d-b631-dcd799179ff3>

ILO NORMLEX – South Africa (ratifications list) – https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:13310:0::NO:13310:P13310_COUNTRY_ID:102888:NO

Basic Conditions of Employment Act 75 of 1997 (PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/a75-97.pdf

Labour Relations Act 66 of 1995 (South African Government) – <https://www.gov.za/documents/labour-relations-act>

Employment Equity Act 55 of 1998 (South African Government) – <https://www.gov.za/documents/employment-equity-act>

Occupational Health and Safety Act 85 of 1993 (PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/act85of1993.pdf

Inspection and Enforcement Services (Department of Employment and Labour) – <https://www.labour.gov.za/inspector-inspection-and-enforcement-services-%282%29>

Labour inspection profile – South Africa (ILO) – <https://www.ilo.org/topics-and-sectors/labour-inspection/labour-inspection-profile-south-africa>

Unemployment Insurance Act 63 of 2001 (South African Government) – <https://www.gov.za/documents/unemployment-insurance-act>

Unemployment Insurance Contributions Act 4 of 2002 (South African Government) – <https://www.gov.za/documents/unemployment-insurance-contributions-act>

Illness benefits at UIF (South African Government) – <https://www.gov.za/services/services-residents/world-work/uif/illness-benefits-uif>

Dependants benefits at UIF (South African Government) – <https://www.gov.za/services/uif/dependants-benefits-uif>

Unemployment Insurance Fund overview (SARS) – <https://www.sars.gov.za/types-of-tax/unemployment-insurance-fund/>

Compensation for Occupational Injuries and Diseases Act 130 of 1993 (South African Government) – <https://www.gov.za/documents/compensation-occupational-injuries-and-diseases-act>

COIDA Service Book (Department of Employment and Labour, PDF) – https://www.labour.gov.za/DocumentCenter/Publications/Compensation%20for%20Occupational%20Injuries%20and%20Diseases/COIDA_SERVICE_BOOK_VERSION_23.pdf

Constitution of the Republic of South Africa, 1996 – Bill of Rights (Section 27) – <https://www.gov.za/documents/constitution/chapter-2-bill-rights>

National Health Act 61 of 2003 (South African Government) – <https://www.gov.za/documents/acts/national-health-act-61-2003-23-jul-2004>

Pension Funds Act 24 of 1956 (South African Government) – <https://www.gov.za/documents/pension-funds-act-22-may-2015-1349>

Social Assistance Act 13 of 2004 (South African Government) –

	https://www.gov.za/documents/social-assistance-act Working for Water (WfW) programme (DFFE) – https://www.dffe.gov.za/working-water-wfw-programme Working for Water Project Operating Standards (PDF) – https://www.dffe.gov.za/sites/default/files/Pdf-Files/guidelines-and-policies/project_operation_standards_0.pdf Working for Water Programme in South Africa (CBD, PDF) – https://www.cbd.int/financial/pes/southafrica-pesworkwater.pdf
Risk Rating justification	This indicator requires that workers in feedstock production have access to basic social protection (health care, sickness, retirement, invalidity, death and workers' compensation). Lack of access can result in poor health, financial hardship, low morale, high turnover of workforce, complaints, and reported incidents. South Africa has ratified all eight fundamental ILO conventions (Conventions 29, 87, 98, 100, 105, 111, 138 and 182). The legal basis for this indicator in South African forestry is the Basic Conditions of Employment Act, Labour Relations Act, Employment Equity Act and Occupational Health and Safety Act. The Department of Labour is the main enforcement authority. Most aspects are covered by South African law and social security, and workers can use public clinics and government hospitals, but workers' compensation for workplace injuries and death-related cover (such as life insurance or dependants' benefits) need specific verification. The available sources do not confirm, benefit by benefit, that sickness, retirement, invalidity, death benefits, unemployment insurance and statutory workers' compensation are in place across the forestry workforce. FSC-certified plantations SBP recognises FSC certification as partially covering this indicator. Only a partial pass is granted, because the FSC standard does not specifically require all social benefits mentioned in the SBP indicator. The ratified ILO core conventions also do not cover them all precisely. FSC does, however, explicitly require compensation that corresponds to sickness and invalidity benefits. South African commercial forestry is highly regulated and over 80% of the forestry area is FSC-certified, with large forestry companies described as having strong governance systems and a "zero tolerance towards unsafe forestry practices". The FSC South Africa NRA's "over 80% FSC-certified" figure refers to the commercial plantation-forestry landholding area and includes both planted compartments and conservation areas within certified management units, not only the planted plantation area. Within this context, the clearest FSC-evidenced elements linked to the indicator are occupational health and safety requirements (including accident recording, legally required safety training such as first aid, safety meetings and risk assessments depending on workforce size, and mandatory reporting of fatalities and hospitalisations to the Department of Labour for investigation). This supports the expectation that, in large FSC-certified plantation settings, documentation and checks for statutory obligations that underpin access to benefits (including workplace injury handling and other employment-related

	entitlements) are more readily auditable than in fragmented contractor-driven contexts. FSC certification does not, by itself, demonstrate full compliance with This indicator. Risk is low only where the supplier employs a stable, directly employed workforce and can evidence, for the workers used in the supplied material, active coverage for statutory mechanisms (UIF for sickness/unemployment and dependants' benefits, COIDA for work-related injury/death, and an occupational retirement fund or equivalent for retirement and associated death/invalidity cover). Risk of incompliance is specific where suppliers use contractors, labour brokers, seasonal crews or subcontractors, because benefit coverage and registrations are often not verifiable worker-by-worker in such arrangements. Uncertified plantations Much of the remaining uncertified area is still managed by large and responsible companies and commercial farmers, but there is a higher risk in communal land contexts where operational activities are performed by contractors, described as sometimes having poor governance systems and minimal record keeping. The main implication is not that the legal framework is absent (the same labour and safety laws still apply), but that verification and enforcement of the practical access pathways to benefits, particularly for temporarily hired labour and contractor workforces, may be weaker and therefore warrants targeted assessments (also in case of FSC-certification). Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. Where clearing invasive species is organised through contractors and short-term hiring, the labour-rights assurance challenges for outsourced operations and limited governance capacity are the closest relevant analogue for this activity type, particularly regarding record keeping and the practical enforceability of employment-linked entitlements. The most material gap for this indicator in such settings is typically not access to public clinics and hospitals in principle, but the verifiable employer-side compliance mechanisms that make benefit access real for workers (especially statutory workplace injury coverage and unemployment-related contributions). Uncertified suppliers and invasive-species clearing operations typically present a higher risk because work is more often contractor-driven and temporary, with weaker record keeping. In these settings, the main risk is not access to public clinics in principle, but missing or non-verifiable employer-side compliance that makes benefits real: UIF registration and contributions, COIDA registration/coverage, and a defined mechanism for retirement/death/invalidity benefits beyond work-injury cases. Temporary hired workers are the highest-risk group because they can fall outside effective registration and contribution processes even when the legal framework applies.
Risk Rating	Specified Risk

Eswatini Whole country - FSC certified plantations	Indicator
4.1.7	Workers shall have access to health care provisions, sickness benefits, retirement benefits, invalidity benefits, death benefits, and workers' compensation
Supply Base Verifiers	Biomass delivered with FSC 100% claim. Employment Act, 1980 (EswatiniLII) — https://eswatiniilii.org/akn/sz/act/1980/5/eng%401998-12-01 Workmen's Compensation Act, 1983 (EswatiniLII) — https://eswatiniilii.org/akn/sz/act/1983/7/eng%401998-12-01/source Swaziland National Provident Fund Order, 1974 (EswatiniLII) — https://eswatiniilii.org/akn/sz/act/order-in-council/1974/23/eng%401998-12-01/source Social Security Programs Throughout the World: Eswatini (SSA, 2018–2019) — https://www.ssa.gov/policy/docs/progdesc/ssptw/2018-2019/africa/eswatini-swaziland.pdf Ministry of Health (Eswatini) – health service delivery levels (PDF) — https://www.gov.sz/images/stories/Health/MOH-Second-Quarter-Performance-Report-October-2019FINAL.pdf
Risk Rating justification	SBP recognises FSC certification as partially covering this indicator; the indicator stays applicable. In FSC-certified plantations in Eswatini, workers' access to social protection is anchored in statutory systems and employer compliance mechanisms. Health care access is provided through the national public health service (clinics, health centres and referral hospitals). Sickness benefits are supported through statutory paid sick leave under employment law. Workers' compensation for occupational injury, disease and work-related death is provided under Eswatini's workers' compensation framework. Retirement, invalidity and death (survivor) benefits, are provided through the national provident-fund system. In FSC-certified plantations, evidence is normally available through employment records and statutory registrations/contribution and compensation arrangements.
Risk Rating	Specified Risk

Eswatini Whole country - FSC certified plantations	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.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.

Risk Rating	Low Risk
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South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	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.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. ILO NORMLEX – South Africa ratifications (incl. the eight fundamental conventions and Convention No. 155) – https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11100:0::NO:11100:P11100_COUNTRY_ID:102888:NO ILO NORMLEX – Conventions not ratified by South Africa (incl. Nos. 187 and 142) – https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11210:0::NO:11210:P11210_COUNTRY_ID:102888 Occupational Health and Safety Act 85 of 1993 (Government Gazette PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/act85of1993.pdf What every worker should know about health and safety at work (Department of Employment and Labour, PDF) – https://www.labour.gov.za/DocumentCenter/Publications/Occupational%20Health%20and%20Safety/What%20every%20worker%20should%20know%20about%20health%20and%20safety%20at%20work_.pdf Guidelines for the Driven Machinery Regulations, 2015 (Government Gazette, PDF) – https://www.gov.za/sites/default/files/gcis_document/201703/40734rg10703gon-288.pdf National Code of Practice for the Training Providers of Lifting Machine Operators, 2024 (incorporated under Driven Machinery Regulations; Government Gazette, PDF) – https://www.gov.za/sites/default/files/gcis_document/202411/51657gon5588.pdf Skills Development Act 97 of 1998 (Government Gazette PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/a97-98.pdf Skills Development Act 97 of 1998 (South African Government page) – https://www.gov.za/documents/skills-development-act SAQA qualification: National Certificate in Forestry: Timber Harvesting (Government Gazette, PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/26174f0.pdf SAQA qualification: National Certificate in Forestry (Plantation establishment/maintenance/harvesting; SAQA database) – https://regqs.saqa.org.za/showQualification.php?id=50225 SAQA unit standard: Demonstrate knowledge of basic safety in forestry operations (SAQA database) – https://allqs.saqa.org.za/showUnitStandard.php?id=117056 FSC National Risk Assessment for South Africa (FSC Connect landing page

	to the NRA PDF) – https://connect.fsc.org/document-centre/documents/resource/255 Working for Water Project Operating Standards (DFFE, PDF) – https://www.dffe.gov.za/sites/default/files/Pdf-Files/guidelines-and-policies/project_operation_standards_0.pdf Assessment of occupational health and safety standards of Working for Water employees in Tzaneen, Limpopo (Open Public Health Journal, 2025, PDF) – https://openpublichealthjournal.com/VOLUME/18/ELOCATOR/e18749445343949/PDF/
Risk Rating justification	SBP normative interpretation: While workers are not required to be familiar with the SBP requirements themselves, their training must equip them to perform their duties competently, safely, and in a manner that complies with the SBP standards. FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations This indicator requires that all plantation workers receive training that enables them to do their work legally and in line with recognised sector best practice, not only for “high-risk” tasks but also for routine field work where unsafe or unlawful practices can still occur. Training that exists only as informal “learning by experience” is difficult to verify and may not be sufficient where the legal framework expects instruction, information, and competent supervision for the hazards of the job. South Africa has ratified all eight fundamental ILO conventions. Beyond the fundamental conventions, South Africa has ratified the ILO Occupational Safety and Health Convention, 1981 (No. 155). It embeds prevention duties that rely on workplace instruction and training. South Africa has not ratified the ILO Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187), nor the ILO Human Resources Development Convention, 1975 (No. 142). Nationally, the core legal basis is the Occupational Health and Safety Act (OHSA) and its regulations, enforced through the Department of Employment and Labour’s occupational health and safety inspectorate, which conducts inspections and investigations and can issue notices requiring corrective measures. The Department’s official guidance on OHSA emphasises that employers must ensure workers understand workplace hazards and how to work safely, and that work and equipment should be under the general supervision of a trained worker who understands the hazards and ensures precautions are implemented. For mechanised and equipment-intensive forestry tasks, regulations and official codes reinforce the “competent person/operator” expectation by linking competence to knowledge, training and experience (illustrated in the Driven Machinery regulatory framework and training-provider codes for machinery operators).

	In parallel, the Skills Development Act establishes the institutional framework for workplace skills development through sector and workplace strategies, and recognised forestry qualifications and unit standards (under the national qualifications system) set out structured competence expectations for forestry operations, including safety and timber harvesting. There is a strong safety culture in large forestry companies and explicitly identifies legally required documents and records that include records of legally required training (notably first aid), health and safety meeting minutes (depending on workforce size), and safety risk assessments, with serious incidents requiring reporting to the Department of Labour for investigation. This supports a lower risk that training duties are ignored in well-governed, directly managed plantation settings, because training and supervision can be evidenced through documented systems. However, there is higher vulnerability where operational activities are contractor-driven (notably in communal land contexts) with minimal record keeping, which is where “inhouse experience-based” training for general workers becomes least verifiable. Machine operators and first aiders are generally formally trained, while forest workers are trained informally, the key compliance risk for this indicator in South African plantations is therefore not whether training exists at all, but whether training for all field roles is systematic, role-appropriate, documented, and demonstrably linked to legal duties and recognised forestry competence standards, especially for contractor and seasonal labour where evidence trails are weakest. Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. The legal and policy expectations for training are broadly the same for trees outside forests (invasive-species clearing), but in practice this work is more often organised through short-term contracting and temporary crews, with weaker supervision structures and poorer documentation, so trainings are harder to evidence and more likely to be inconsistent.
Risk Rating	Specified Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. International Generic Indicators (FSC-STD-60-004, FSC) – https://fsc.org/en/document-centre/documents/retrieve/2a0d35e7-2707-43ad-a493-3192b3daea6a The FSC National Forest Stewardship Standard of the Republic of South Africa (FSC-STD-ZAF-2017 V1-0, FSC Connect) – https://connect.fsc.org/document-centre/documents/retrieve/3dad4fe0-0c91-

	4b0d-b631-dcd799179ff3 Ratifications for South Africa (ILO NORMLEX) – https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11100:0::NO:11100:P11100_COUNTRY_ID:102888 Up-to-date Conventions and Protocols not ratified by South Africa (ILO NORMLEX) – https://www.ilo.org/dyn/normlex/en/f?p=1000:11210:0::NO:11210:P11210_COUNTRY_ID:102888 Labour Relations Act 66 of 1995 (South African Government, PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/act66-1995labourrelations.pdf Commission for Conciliation, Mediation and Arbitration (CCMA) (Department of Employment and Labour) – https://www.labour.gov.za/About-Us/Pages/CCMA1.aspx CCMA (official website) – https://www.ccma.org.za/ Labour and Labour Appeal Court directives and rules (Judiciary of South Africa) – https://www.judiciary.org.za/index.php/judiciary/directives/labour-and-labour-appeal-court Basic Conditions of Employment Act: Code of Good Practice for employment and conditions of work for Expanded Public Works Programmes (South African Government) – https://www.gov.za/documents/basic-conditions-employment-act-code-good-practice-employment-and-conditions-work-expanded Code of Good Practice for employment and conditions of work for Special Public Works Programmes (EPWP, DOC) – https://www.epwp.gov.za/downloads/legal_codeofgood.doc The Political Economy of Labour Precarity in South African forestry (Tandfonline, 2024) – https://www.tandfonline.com/doi/full/10.1080/07360932.2024.2447734
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations This indicator requires that workers can raise workplace concerns and have them addressed through a functioning internal process and, where needed, an accessible independent dispute-resolution route, without retaliation. In South Africa, the core international basis is the ratified ILO fundamental conventions on freedom of association, collective bargaining and non-discrimination, supported by governance and OSH instruments that reinforce enforceable rights at work, including the Labour Inspection Convention and the Occupational Safety and Health Convention, and the more recent Violence and Harassment Convention. South Africa has not ratified several ILO instruments that are often referenced for strengthening workplace dialogue and systems, including the Human Resources Development Convention, the Collective Bargaining Convention, the Promotional Framework for Occupational Safety and Health Convention, and the Termination of Employment Convention. The national legal basis is strong for formal employment relationships. The

	Labour Relations Act establishes a structured system for resolving disputes, with conciliation and arbitration routes through the Commission for Conciliation, Mediation and Arbitration and accredited bargaining councils, and adjudication by the Labour Court and Labour Appeal Court where applicable. The Department of Employment and Labour is the central authority for labour administration and enforcement, and its public reporting describes its inspection and enforcement functions across labour legislation. For forestry plantations, this framework means that, even where a supplier's internal grievance procedure is basic, workers still have a legally established external pathway for disputes and unfair labour practices, provided they are treated as employees and can access the system in practice. In large commercial plantation settings with stable, directly employed workforces, grievance handling is more likely to be formalised and evidenced because larger employers typically run documented HR processes and interact regularly with statutory institutions; the company's statement that most commercial growers have a system, and that it maintains a complaints register, is consistent with that pattern. However, South African forestry has long been characterised by extensive contracting, and more recent analysis of labour precarity in forestry continues to highlight chain subcontracting as a structural feature; these arrangements can weaken workers' practical access to grievance mechanisms when employment status is unclear, representation is limited, or workers fear job loss, even though legal rights remain. For uncertified plantations and fragmented supplier contexts, especially where work is delivered through subcontractors, labour brokers and seasonal crews, the workplace grievances are possibly not resolved effectively at the company, because workers may lack written procedures, trusted reporting channels, and reliable access to representation, and disputes may never reach the formal fora if workers are disengaged before they can pursue remedies. In such cases, the existence of courts and statutory bodies reduces the likelihood that the indicator is wholly unaddressed at country level, but the minimum legal framework alone is not sufficient to assume effective workplace-level grievance resolution without targeted verification of how workers actually raise complaints and obtain remedy. Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. For trees outside forests and invasive-species clearing, the same labour-law dispute system applies where workers are employees, but the practical risk is typically higher because clearing work is often organised as short-duration, contractor-led field operations with dispersed crews and weaker governance capacity. Where clearing is delivered through public employment-type programmes, South Africa's Expanded Public Works Programme framework explicitly requires a disciplinary code and a grievance procedure for programme workers, which supports the expectation that mechanisms should exist on paper, but it does not remove the need to verify implementation.
Risk Rating	Specified Risk

Eswatini Whole country - FSC certified plantations	Indicator
4.1.9	Mechanisms shall be in place for resolving grievances and disputes in the workplace.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	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.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	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.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. ILO NORMLEX – South Africa (ratifications and supervisory information) – https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11100:0::NO:11100:P11100_COUNTRY_ID:102888 ILO NORMLEX – Up-to-date Conventions and Protocols not ratified by South Africa – https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11210:0::NO:11210:P11210_COUNTRY_ID:102888 Occupational Health and Safety Act 85 of 1993 (Government Gazette PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/act85of1993.pdf Occupational Health and Safety Act 85 of 1993 (South African Government page) – https://www.gov.za/documents/occupational-health-and-safety-act Physical Agents Regulations, 2024 (Government Gazette under OHSA; published 6 March 2025) – https://www.gov.za/sites/default/files/gcis_document/202503/52226gon5952.pdf The Profile: Occupational Health and Safety South Africa (Department of

	Employment and Labour, PDF) – https://www.labour.gov.za/DocumentCenter/Publications/Occupational%20Health%20and%20Safety/The%20Profile%20Occupational%20Health%20and%20Safety%20South%20Africa.pdf What every worker should know about health and safety at work (Department of Employment and Labour, PDF) – https://www.labour.gov.za/DocumentCenter/Publications/Occupational%20Health%20and%20Safety/What%20every%20worker%20should%20know%20about%20health%20and%20safety%20at%20work_.pdf Department of Employment and Labour Annual Report 2023/2024 (PDF) – https://www.gov.za/sites/default/files/gcis_document/202501/employment-labour-annual-report-202324.pdf Department of Employment and Labour – Status of Compliance Report highlights (8 Oct 2024) – https://www.labour.gov.za/departement-of-employment-and-labour-status-of-compliance-report-highlights-the-need-to-improve-compliance-with-labour-law Working for Water Project Operating Standards (Department of Forestry, Fisheries and the Environment, PDF) – https://www.dffe.gov.za/sites/default/files/Pdf-Files/guidelines-and-policies/project_operation_standards_0.pdf Assessment of Occupational Health and Safety Standards of Employees Working for Water Programme in Tzaneen, Limpopo Province (Open Public Health Journal, 12 Feb 2025, PDF) – https://openpublichealthjournal.com/VOLUME/18/ELOCATOR/e18749445343949/PDF/ Sappi Group Sustainability Report 2024 (includes forestry contractor fatality disclosure; PDF) – https://cdn-s3.sappi.com/s3fs-public/2024-Sappi-Group-Sustainability-Report-Final-7.pdf Mondi Group Sustainable Development Report 2024 (PDF) – https://www.mondigroup.com/globalassets/mondigroup.com/sustainability/reports-and-publications/2024/mondi-group-sustainable-development-report-2024.pdf SAFCOL Integrated Report 2023/24 (PDF) – https://www.safcol.co.za/wp-content/uploads/2025/01/K-17107-SAFCOL-IAR-2023-24_DevV41-interactive.pdf
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations South Africa has ratified the ILO Occupational Safety and Health Convention (No. 155), but has not ratified the ILO Promotional Framework for Occupational Safety and Health Convention (No. 187), and it has not ratified the ILO Occupational Health Services Convention (No. 161) (the national OSH profile notes it is being considered). In South African wood plantations, the core legal basis for this indicator is the Occupational Health and Safety Act (Act 85 of 1993) and its regulations, which require employers (including principal contractors) to develop, communicate and implement measures that maintain a work environment that

	is safe and without risk to health, supported by hazard identification and risk control, worker information and instruction, safe work procedures, provision and correct use of PPE, and participation structures such as health and safety representatives and committees where applicable. Fatalities and serious incidents trigger mandatory notification and investigation pathways under the national OSH system, and the Department of Employment and Labour (Inspectorate: Occupational Health and Safety) is the main enforcement authority, with powers to inspect, investigate and issue prohibition/contravention/direction notices; the Department's recent annual reporting and worker guidance publications describe these enforcement mechanisms and confidentiality of complaints as part of the system design. For plantation forestry, there is a strong sector safety culture among large plantation companies, widespread use of formal safety management elements (accident recording, legally required training such as first aid, safety meetings and risk assessments depending on workforce size), and mandatory reporting of fatalities and hospitalisations to the Department of Labour for investigation; this supports a generally low that safeguards are absent in large-scale plantation settings. However, reporting by major plantation-linked companies still records serious incidents (including contractor fatalities), showing that "having policies and procedures" does not eliminate operational risk and that contractor management remains a key vulnerability. The risk increases in fragmented, contractor-driven parts of the plantation supply chain where governance and record keeping are weaker, because formal safeguards can exist on paper while day-to-day implementation (task-based supervision, PPE discipline, competence assurance, incident learning and enforcement of stop-work rules) is inconsistent across subcontractors and seasonal crews. Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. For trees outside forests in invasive-species clearing, the legal basis remains the same, and public programmes such as Working for Water have operational standards that include health-and-safety training, PPE and safe working procedures. However, recent peer-reviewed research on Working for Water field operations reports gaps such as minimal training and weak occupational health and safety practices in practice. This makes the situation broadly similar to plantations in legal design but typically worse in implementation risk, because invasive-species clearing is often organised through short-term contracts, dispersed crews and variable supervision, which increases the likelihood that safeguards are not consistently communicated and enforced at the workplace.
Risk Rating	Specified Risk

South Africa
Mpumalanga; KwaZulu-Natal; Eastern Cape

Indicator

4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. ILO NORMLEX: Ratifications for South Africa (shows ratified ILO fundamental conventions) – https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11100:0::NO:11100:P11100_COUNTRY_ID:102888 ILO NORMLEX: Up-to-date instruments not ratified by South Africa (shows non-ratification, incl. ILO Convention 169) – https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11210:0::NO:11210:P11210_COUNTRY_ID:102888 National Environmental Management Act 107 of 1998 (government page) – https://www.gov.za/documents/national-environmental-management-act EIA Regulations under NEMA (consolidated/merged regulations PDF incl. public participation requirements) – https://screening.environment.gov.za/ScreeningDownloads/Gazettes/Merged_Regulations_LNs_and_Withdrawal_Notice.pdf Public participation guideline in terms of the NEMA EIA Regulations (DFFE PDF) – https://www.dffe.gov.za/sites/default/files/docs/publicparticipationguideline_intermsofnemaEIAregulations.pdf National Water Act 36 of 1998 (official government PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/a36-98.pdf Stream Flow Reduction Activities: Combined licensing guidelines (DWS PDF; licensing/registration framework used for plantation forestry) – https://www.dws.gov.za/sfra/Licensing/pdf/Combined%20Licensing%20Guidelines.pdf Spatial Planning and Land Use Management Act 16 of 2013 (official government PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/367305-8act16of20.pdf National Environmental Management: Biodiversity Act 10 of 2004 (government page) – https://www.gov.za/documents/national-environmental-management-biodiversity-act-0 Alien and invasive species regulations under NEMBA (Government Gazette, 2014, GN R.598 PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/37885rg10244gon598.pdf Alien and Invasive Species Regulations (amended/re-issued, 2020, Government Gazette PDF) – https://www.gov.za/sites/default/files/gcis_document/202009/43735rg11176gon1020.pdf Working for Water programme (DFFE overview: ecological objectives, jobs/training) – https://www.dffe.gov.za/working-water-wfw-programme Working for Water programme (DWS overview) – https://www.dws.gov.za/wfw/ Restitution of Land Rights Act 22 of 1994 (government page) – https://www.gov.za/documents/restitution-land-rights-act

	Restitution of Land Rights Act 22 of 1994 (official government PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/act22of1994.pdf Commission on Restitution of Land Rights Annual Report 2024/25 (most recent CRLR annual reporting PDF) – https://static.pmg.org.za/Commission_on_Restitution_of_Land_Rights_CRLR_Annual_Report_2024-2025.pdf
Risk Rating justification	The Supply Base Evaluation for three provinces in eastern South Africa focused firstly on whether national and provincial government processes identify and manage negative social impacts from plantation forestry and invasive-species clearing in a sufficiently thorough way. South Africa's international baseline for this topic is anchored in ratified ILO fundamental conventions (including freedom of association and collective bargaining and non-discrimination), while South Africa has not ratified the ILO Indigenous and Tribal Peoples Convention (No. 169), so Indigenous Peoples' rights are addressed mainly through constitutional rights, equality and administrative-justice frameworks rather than that specific ILO instrument. In practice, the central national framework used to prevent and manage negative community impacts from plantation expansion and related activities is the integrated authorisation system for land-use change and resource use: the National Environmental Management Act and the EIA Regulations (with mandatory public participation and consideration of social and economic impacts where relevant), the National Water Act (under which plantation forestry is regulated as a streamflow-reduction activity through registration and licensing), and land-use planning instruments under the Spatial Planning and Land Use Management Act that guide where land uses are permissible at municipal and provincial level. The competent authorities are the Department of Forestry, Fisheries and the Environment and provincial environmental authorities for environmental authorisations and compliance monitoring, the Department of Water and Sanitation for water-use authorisations and enforcement, and local authorities through land-use planning and permitting functions. For invasive-species clearing (trees outside forests), the legal basis remains the same for environmental and water governance, while the National Environmental Management: Biodiversity Act and Alien and Invasive Species Regulations establish duties and permitting controls for listed invasive species, and government programmes such as Working for Water operate as major implementation vehicles that combine ecological objectives with local employment and community interface. FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations Reviewed sources confirm that government systems exist and are applied at national and regional level to conduct impact assessment and public participation, consider the interests of local communities (and, where applicable, Indigenous and traditional leadership structures), map environmental and social risks and competing land-use interests, and define

	conditions under which plantations may be authorised or expanded. In plantation forestry, the regulatory model is explicitly preventative: new establishment and expansion are tied to environmental authorisation processes, water-use authorisations for streamflow impacts, and conditions that address sensitive areas, watercourses, and broader environmental and social considerations. A central implementation challenge remains the legacy of historic and uneven land tenure and the continuing work to recognise and remedy disregarded tenure interests and to advance fairer land use. The Restitution of Land Rights Act and the associated Commission on Restitution of Land Rights and Land Claims Court provide the formal national mechanism for restitution, while wider land-reform policy and administrative processes continue to evolve. Independent sources and the national evaluative reporting describe restitution and tenure reform as ongoing state work requiring continued support and governance capacity, particularly where land is restored to communities. Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. For invasive-species clearing, the permitting and duty-of-care model under biodiversity legislation and the operational standards of public programmes create an additional layer of procedural control, but implementation risk is typically more variable than in large plantation settings because clearing work is often dispersed, short-term, and contractor-delivered, which can weaken the consistency of community engagement and on-the-ground safeguards unless oversight and record keeping are strong. General outcome On the evidence reviewed, national and provincial policy and administrative mechanisms make the overall framework sufficient for this indicator: “Negative social and community impacts shall be identified and avoided”. Policies, laws, regulations and programmes provide defined routes to identify impacts, consult affected parties, set binding conditions, and challenge decisions. Institutions with inspection, enforcement and adjudication functions are in place to address social impacts and historic imbalances, although implementation remains a very challenging ongoing task. It should also be recognised that, when biomass sourcing is implemented properly, it provides income, employment, economic incentive to fight the spread of invasive species (increasing water availability), and other benefits for local communities and the regional economy. Because many plot-level sustainability risks are already addressed through previously assessed specified-risk indicators, namely on legality; identification and protection of biodiversity and HCV areas; environmental management; water use and quality; integrated pest management; regeneration; stable production; and several relevant social and labour indicators, classifying this higher-level community-impact indicator as specified risk would not add additional control beyond what is already required and implemented onsite.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
4.2.1	Negative social and community impacts shall be identified and avoided.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	Indicator
4.2.2	Feedstock sourcing shall positively contribute to the local economy, including employment.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Forestry (South African Government overview) – https://www.gov.za/about-sa/forestry Forestry, Fisheries and the Environment (South African Government overview) – https://www.gov.za/about-sa/forestry-fisheries-and-environment Forestry, logging and related services industry, 2023 (Statistics South Africa, Report No. 12-00-00, 26 March 2025, PDF) – https://www.statssa.gov.za/publications/12-00-00/12-00-002023.pdf Forestry, logging and related services industry, 2023 (Statistics South Africa media presentation, 26 March 2025, PDF) – https://www.statssa.gov.za/publications/12-00-00/Forestry%20%26%20logging%20industry%202023%20%28Media%20presentation%29.pdf Master Plan for the Commercial Forestry Sector in South Africa: 2020–2025 (the dtic, September 2020, PDF) – https://www.thedtic.gov.za/wp-content/uploads/Masterplan-Forestry_Sector.pdf Minister Barbara Creecy: Launch of community forestry agreements (South

	African Government, 23 April 2024) – https://www.gov.za/news/speeches/minister-barbara-creecy-launch-community-forestry-agreements-23-apr-2024 Eight plantations to be transferred to local communities (DFFE media release, 3 April 2025) – https://www.dffe.gov.za/index.php/mediareleases/george_eightplantationstransferred Eastern Cape communities receive forestry plantations (SAnews, 30 June 2022) – https://www.sanews.gov.za/south-africa/eastern-cape-communities-receive-forestry-plantations South Africa Yearbook 2023/24: Forestry, Fisheries and the Environment (GCIS, PDF) – https://www.gcis.gov.za/sites/default/files/docs/resourcecentre/yearbook/2025/yearbook2023-24-7%20Forestry%2C%20Fisheries%20and%20the%20Environment%202023-24.pdf State of the Forests Report: 2021 – South Africa (DFFE, PDF) – https://www.dffe.gov.za/sites/default/files/reports/stateoftheforestsreport_2021.pdf ILO NORMLEX – Ratifications for South Africa – https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11100:0::NO:11100:P11100_COUNTRY_ID:102888:NO Labour postpones signing of the ILO Employment Policy Convention No. 122 (South African Government media statement, 10 April 2019) – https://www.gov.za/news/media-statements/labour-postpones-signing-international-labour-organisation%E2%80%99s-employment National Forests Act 84 of 1998 (South African Government, PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/a84-98.pdf Investing in South Africa's Forestry, Pulp and Paper and Furniture (InvestSA fact sheet, 2020, PDF) – https://www.investsa.gov.za/wp-content/uploads/2021/03/FACT-SHEET_FORESTRY_2020.pdf
Risk Rating justification	South Africa's industrial forestry is almost entirely plantation-based and concentrated in the eastern part of the country (especially KwaZulu-Natal, Mpumalanga and parts of the Eastern Cape). This plantation value chain is a material rural-economic activity: the national government's forestry overview describes forestry and forest products as supporting large numbers of jobs and rural livelihoods and making a measurable contribution to provincial GDP in the main plantation provinces, while Statistics South Africa's most recent forestry and logging industry reporting shows rising industry income over 2019–2023, a modest increase in forestry-and-logging employment over the same period, and a strong geographic concentration of forestry-and-logging jobs in KwaZulu-Natal and Mpumalanga. These data, taken together with the established and developing downstream wood processing industry, support the conclusion that plantation feedstock cultivation is economically important. It provides employment and income in rural local economies where alternative formal employment is limited. At national and provincial level, the enabling framework for this indicator is primarily policy- and programme-driven rather than a single "positive

	contribution” legal requirement. South Africa has ratified all eight ILO fundamental conventions (covering forced labour, freedom of association, collective bargaining, equality and child labour), which supports the labour-rights baseline under which employment benefits should be realised; at the same time, the Department of Employment and Labour has publicly noted that ratification of the ILO Employment Policy Convention (No. 122) was being postponed pending domestic policy development. Nationally, the National Forests Act sets principles for sustainable forest development and management that include social and economic benefits and their fair distribution, and the wider labour-law framework (with the Department of Employment and Labour as the central enforcement authority) governs the conditions under which plantation employment is created. On economic development and job-creation, the Forestry Sector Master Plan (published under government’s industrial policy structures) explicitly positions forestry as a rural-development sector, reports that it supports hundreds of thousands of livelihoods, and sets expansion and investment priorities; subsequent government communications on implementing the Master Plan (including community-forestry agreements and afforestation expansion) describe explicit job-creation targets and identify new afforestation and bringing plantations back into production as major employment levers, including in provinces where plantation forestry is a dominant land use. FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations The national and provincial framework is sufficient to meet the intent of the indicator at the level of plantation forestry: the sector demonstrably contributes to rural incomes and employment, and government policy and programmes explicitly aim to expand plantation output, participation and job creation (including through community and small-grower inclusion and investment mobilisation). Plantation feedstock sourcing, when legal and well-managed, is structurally aligned with national and provincial employment and local-economic objectives and delivers income and related benefits to local communities and the wider rural economy. Because the issue is addressed at national and regional level, and plot-level risks are already covered by other specified-risk indicators (including legality and key workforce aspects), classifying this indicator as specified risk is not necessary. Trees Outside Forests Urban and Landscape (TOF) This indicator is not applicable to TOF urban areas and landscapes.
Risk Rating	Low Risk

Natal; Eastern Cape	
4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. National Water Act 36 of 1998 (official text; streamflow-reduction activity and water-use licensing framework) – https://www.gov.za/sites/default/files/gcis_document/201409/a36-98.pdf National Water Act, section on “Declaration of stream flow reduction activities” (includes commercial afforestation) – https://lawlibrary.org.za/akn/za/act/1998/36/eng%401999-12-06/provision/chp_4__part_4__sec_36 Department of Water and Sanitation: SFRA history (afforestation declared a streamflow-reduction activity; regulatory basis) – https://www.dws.gov.za/sfra/sfra_lic_history.asp Department of Water and Sanitation: Stream Flow Reduction Activities licensing guidelines (application, conditions and process) – https://www.dws.gov.za/sfra/Licensing/pdf/Combined%20Licensing%20Guidelines.pdf Procedural requirements for water use licence applications (Government Gazette; licensing procedure under the National Water Act) – https://www.gov.za/sites/default/files/gcis_document/201703/40713rg10701gon267.pdf Constitution of the Republic of South Africa, Bill of Rights (environment right; basis for safeguarding health/well-being) – https://www.gov.za/documents/constitution/chapter-2-bill-rights South Africa water scarcity (official government overview) – https://www.gov.za/about-sa/water-affairs National Water and Sanitation Master Plan (government plan; national water context and measures) – https://www.gov.za/sites/default/files/gcis_document/201911/national-water-and-sanitation-master-plandf.pdf National Water Resource Strategy, Third Edition (NWRS-3; national strategy for protection and equitable access) – https://www.dws.gov.za/Documents/Gazettes/Approved%20National%20Water%20Resource%20Strategy%20Third%20Edition%20%28NWRS3%29%202023.pdf National Environmental Management Act 107 of 1998 (government page) – https://www.gov.za/documents/national-environmental-management-act NEMA EIA Regulations (merged regulations and notices; includes procedural/public participation requirements) – https://screening.environment.gov.za/ScreeningDownloads/Gazettes/Merged_Regulations_LNs_and_Withdrawal_Notice.pdf National Environmental Management: Biodiversity Act 10 of 2004 (government page) – https://www.gov.za/documents/national-environmental-management-biodiversity-act-0 Alien and Invasive Species Regulations, 2014 (Government Gazette) – https://www.gov.za/sites/default/files/gcis_document/201409/37885rg10244g

	on598.pdf Alien and Invasive Species Lists (2020) – https://www.dffe.gov.za/sites/default/files/legislations/nemba_invasivespecieslist_g43726gon1003.pdf Working for Water programme (government programme on invasive alien plant control; catchments/jobs) – https://www.dffe.gov.za/working-water-wfw-programme Water Research Commission (recent synthesis on invasive alien plants and water-resource impacts; links to Working for Water rationale) – https://wrc.org.za/?mdocs-file=67024 Ramsar Convention (official contracting parties list; confirms South Africa as a Party) – https://www.ramsar.org/sites/default/files/documents/library/annotated_contracting_parties_list_e.pdf Ramsar: South Africa country profile (wetlands framework relevant to water-related basic-needs values) – https://www.ramsar.org/country-profile/south-africa Convention on Biological Diversity: South Africa country profile (party and biodiversity context) – https://www.cbd.int/countries/profile/?country=za ILO NORMLEX: Ratifications for South Africa (ILO baseline) – https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11100:0::NO:11100:P11100_COUNTRY_ID:102888 State of the Forests Report: 2021 (plantation forestry mainly in Mpumalanga, KwaZulu-Natal and the Eastern Cape) – https://www.dffe.gov.za/sites/default/files/reports/stateoftheforestsreport_2021.pdf
Risk Rating justification	South Africa's plantation forestry operates in a water-scarce country where commercial afforestation is legally treated as a streamflow-reduction activity and is therefore regulated specifically to protect water resources that people and downstream users depend on. National and provincial systems require that new plantations, expansions and associated infrastructure are authorised through environmental assessment and permitting routes and water-use authorisation, with conditions that include protection of wetlands, riparian areas and buffers, and enforceable compliance measures. In parallel, the broader framework for safeguarding basic community needs is anchored in constitutional rights to an environment not harmful to health and well-being and to sufficient water, implemented through water and environmental legislation and enforcement. The key authorities relevant to this indicator are the Department of Water and Sanitation (water-use authorisations, monitoring and directives for non-compliance), the Department of Forestry, Fisheries and the Environment and provincial environmental authorities (environmental authorisations and biodiversity-related controls), and the conservation and heritage authorities where protected sites or sensitive values are implicated. South Africa is party to major environmental agreements that support protection of biodiversity and wetlands that underpin food and water security, while it has not ratified the ILO Indigenous and Tribal Peoples Convention (No. 169), which is sometimes cited internationally in discussions of

Indigenous resource dependence.

For trees outside forests in invasive-species clearing, the same national environmental and water-protection framework applies, and the dominant public rationale of invasive-alien plant control programmes is to protect catchments and enhance water availability while reducing ecological harm. This aligns directly with maintaining (and in many cases enhancing) water-related basic-needs values, provided clearing is authorised where required and implemented with safeguards to avoid collateral impacts (such as erosion, chemical misuse or disruption of local access to water points). Taken together, the evidence supports the conclusion that South Africa's national and provincial policy, legal and programme mechanisms are capable of maintaining the food- and water-related values essential to basic community needs in both plantation forestry and invasive-species clearing, while recognising that the most meaningful residual risk is localised and implementation-related (notably in communal contexts where resource-access equity is most sensitive and requires effective engagement and conditions at project level).

Direct overlap between plantation forestry and the territories of the historically recognised Indigenous groups is very limited, while rural communities in communal areas can remain dependent on natural resources (including fuelwood, grazing, water, wild foods and traditional medicines). This means the indicator is most practically relevant where plantations and plantation-linked activities interact with communal land contexts and local resource-access patterns, rather than being a general "traditional forest dependence" issue.

FSC-certified plantations

SBP recognises that FSC certification covers this indicator.

The conservation set-asides within certified management units are designed to protect environmental values and ecosystem services (notably water and soil protection), but FSC's community-needs concept (HCV5) also explicitly covers sites and resources of importance for basic necessities from the forest where these are identified through engagement with local communities.

Uncertified plantations

For uncertified plantations, the same legal duties and permitting controls apply and basic-needs resources are generally respected. However, in communal areas this can become sensitive if a community woodlot or plantation expansion changes who can use land and everyday resources (such as water, grazing or fuelwood); in that case, some residents may lose practical access unless the allocation and access arrangements are agreed transparently and applied fairly.

Trees Outside Forests Urban and Landscape (TOF)

This indicator is not applicable to TOF urban areas and landscapes.

General outcome

The legal and institutional framework is sufficient to cover this indicator for

	plantations, because it provides enforceable routes to identify and control impacts on water and other critical ecosystem services, requires authorisation before afforestation and related land-use change, and enables corrective action where non-compliance threatens water availability or other basic-needs values.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
4.2.3	Food, water supply or high conservation values (HCV) that are essential for the fulfilment of basic needs of communities shall be maintained or enhanced
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	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.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	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.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. Restitution of Land Rights Act 22 of 1994 (official PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/act22of1994.pdf Land Claims Court (official site) – https://www.justice.gov.za/lcc/ Commission on Restitution of Land Rights (annual report 2024/25; most recent public report) – https://static.pmg.org.za/Commission_on_Restitution_of_Land_Rights_CRLR_Annual_Report_2024-2025.pdf Interim Protection of Informal Land Rights Act (IPILRA) (official consolidated

	text via FAOLEX PDF) – https://faolex.fao.org/docs/pdf/saf16337.pdf Communal Property Associations Act 28 of 1996 (official page with PDF) – https://www.gov.za/documents/communal-property-associations-act Extension of Security of Tenure Act 62 of 1997 (official PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/a62-97.pdf Land Reform (Labour Tenants) Act 3 of 1996 (official PDF) – https://www.gov.za/sites/default/files/gcis_document/201409/act3of1996.pdf National Environmental Management Act EIA Regulations (current consolidated version, including public participation requirements) – https://cer.org.za/wp-content/uploads/1999/01/NEMA-EIA-Regulations-2014-current-as-at-5-Feb-2025.pdf Department of Forestry, Fisheries and the Environment: Community Forestry Agreements speech (government statement on legally binding community forestry agreements) – https://www.gov.za/news/speeches/minister-barbara-creecy-launch-community-forestry-agreements-23-apr-2024 Department of Forestry, Fisheries and the Environment media release (plantations transferred to communities) – https://www.dffe.gov.za/index.php/mediareleases/george_eightplantationstransferred Peer-reviewed research (forest land under claim; settlement/engagement models and prevalence of plantation land claims) – https://www.sciencedirect.com/science/article/abs/pii/S0264837715000241 Peer-reviewed research (forest-based land reform partnership models in plantation forestry; leaseback/community models) – https://www.sciencedirect.com/science/article/abs/pii/S1389934122000673
Risk Rating justification	Legal, customary and traditional tenure and use rights in South Africa are protected through a combination of constitutional recognition of customary law and traditional leadership, land-reform and restitution institutions, and ordinary property and land-use regulation. South Africa has ratified the eight ILO fundamental conventions, but it has not ratified ILO Convention 169 on Indigenous and Tribal Peoples, so the international framework most directly tailored to Indigenous tenure is not in force; in practice, tenure protection is instead grounded in domestic law and institutions. FSC-certified plantations SBP recognises that FSC certification covers this indicator. FSC can add safeguards and documentation requirements that exceed legal minimums, including set-asides/HCV management that can also protect community basic-needs resources when these are present and identified. Uncertified plantations For plantation forestry, the core national basis is the Constitution's property and land-reform framework, implemented through land-reform statutes and processes that identify, record and resolve competing rights and claims. Key instruments include the Restitution of Land Rights Act (with the Commission on Restitution of Land Rights and the Land Claims Court), the Interim Protection of Informal Land Rights Act (protecting informal and communal land rights against deprivation without consent), the Communal Property

Associations Act (supporting community ownership/holding structures where land is restored or acquired), and tenure-security protections applicable to rural occupiers. These run alongside land-use and environmental authorisation systems that require public participation and provide formal routes to object, appeal and litigate where tenure interests may be affected. The main relevant authorities therefore include the land-reform and restitution institutions (Commission and Land Claims Court) and the national land-reform department, with complementary roles for environmental, water and local-government authorities where plantations are authorised, expanded or materially changed.

Commercial plantation forestry is highly regulated and has low overall risk of land-tenure transgressions at regional level, largely because disputes can be submitted through established legal processes. Policies recognise the enduring structural challenge: historic dispossession and uneven land tenure, with restitution and tenure reform continuing as an active implementation agenda.

Peer-reviewed forestry research and government reporting on restitution confirm that plantation areas can be subject to land claims and that structured partnership models (including lease or co-management arrangements) are used to keep plantations productive while rights are resolved and benefits are negotiated.

Trees Outside Forests Urban and Landscape (TOF)

This indicator is only applicable to TOF landscapes.

For trees outside forests and invasive-species clearing in landscapes, the same tenure and restitution framework applies to the land on which clearing occurs, and additional operational risk arises because clearing is often contractor-delivered, short-term and dispersed, which can weaken documentation of who authorised access and who holds use rights to biomass, fuelwood or other resources. Where clearing occurs on communal land or in areas with informal rights, the practical requirement is not only “permission from the landowner” but demonstrable identification of the relevant rights-holding structure and consent/authorisation consistent with informal-rights protection and customary processes.

General outcome

The South African legal and institutional framework is sufficient to meet this indicator, because it provides recognised tenure categories (including customary/informal rights), dedicated restitution and adjudication bodies, and formal procedures to contest and remedy infringements.

The additional set-aside measures applied under FSC certification (which sometimes go beyond legal requirements) are indirectly also required through the site-assessment indicators in this SBE. Specified-risk indicators 2.1.1, 2.1.2 and 2.1.3 cover the identification, impact assessment and protection of high conservation values, including HCV 5 (Community needs): “Sites and resources fundamental for satisfying the basic necessities of local communities or Indigenous Peoples.” In addition, SBP requires a Stakeholder Engagement Plan and a comments and complaints procedure.

	Even with effective law enforcement, compliance with this indicator requires plot-level evidence of who holds the relevant tenure and use rights and which authorisations or agreements apply, because these details are not confirmed merely by the existence of national laws and institutions. In this SBE, that evidence is already required through the legality and site-characteristics assessment indicators. Who holds the rights, and which permissions or agreements are in place, needs to be confirmed for each sourcing area. This can be a practical challenge, for example in case of communal lands and in contractor-managed operations.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	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.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. National Appeal Regulations (procedure for appeals against environmental decisions under NEMA and specific environmental management Acts; Government Gazette, 13 March 2025, PDF) – https://www.gov.za/sites/default/files/gcis_document/202503/52269rg11811gon5985.pdf DFFE Appeals and Legal Review (official portal on environmental appeals/review processes) – https://www.dffe.gov.za/AppealsandLegalReview NEMA EIA Regulations, 2014 (as amended; public participation, objections and procedural steps; consolidated PDF) – https://cer.org.za/wp-content/uploads/1999/01/NEMA-EIA-Regulations-2014-as-amended.pdf Promotion of Administrative Justice Act 3 of 2000 (PAJA; judicial review and procedural fairness routes, PDF) – https://www.justice.gov.za/legislation/acts/2000-003.pdf National Water Act 36 of 1998 (official PDF; directives and enforcement for non-compliance with water-use authorisations) – https://www.gov.za/sites/default/files/gcis_document/201409/a36-98.pdf DWS National Water Act index (direct access to Chapter 4, Part 10 on contraventions and rectification directives) – https://www.dws.gov.za/iwqs/nwa/index.html Government statement urging the public to report illegal discharge to water resources (includes DWS hotline and reporting channels) – https://www.gov.za/news/media-statements/water-and-sanitation-urges-communities-report-illegal-discharge-water Restitution of Land Rights Act 22 of 1994 (official PDF; restitution claims framework) – https://www.gov.za/sites/default/files/gcis_document/201409/act22of1994.pdf Land Claims Court (official judiciary page; adjudication route for

	restitution/land claims disputes) – https://www.justice.gov.za/lcc/Interim Protection of Informal Land Rights Act (IPILRA; consent/lawful process protections for informal/communal rights; consolidated PDF) – https://faolex.fao.org/docs/pdf/saf16337.pdf Legal Aid South Africa Act 39 of 2014 (government page) – https://www.gov.za/documents/legal-aid-south-africa-act Legal Aid South Africa: “How it works” (confirms coverage including land rights matters and means-test basis) – https://legal-aid.co.za/how-it-works/ Public Protector: complaint process (how to lodge complaints about maladministration/administrative injustice) – https://www.pprotect.org/?q=content%2Fcomplaint-process Expanded Public Works Programme (EPWP): Code of Good Practice (includes requirement for disciplinary code and grievance procedure for programme workers; DOC) – https://www.epwp.gov.za/downloads/legal_codeofgood.doc
Risk Rating justification	Mechanisms for resolving grievances and disputes on tenure and use rights in South Africa are primarily provided through public-law processes (consultation, objections and administrative appeals for land-use and environmental decisions) and through specialist and ordinary courts for land-rights claims and enforcement. South Africa has ratified the ILO fundamental conventions that underpin non-discrimination and freedom of association, but it has not ratified the ILO Indigenous and Tribal Peoples Convention (No. 169), so tenure and use-rights protections for Indigenous Peoples and local communities are addressed mainly through domestic constitutional and land-reform law rather than that specific ILO instrument. At national and provincial level, disputes relating to plantation establishment, expansion or operational changes can be raised during mandatory public participation processes and then escalated through formal administrative appeals and judicial review routes under environmental and administrative-justice frameworks. Water-related grievances linked to plantation impacts are channelled through the water authorisation system, including compliance complaints and enforcement action by the water authority where licensing conditions are breached. Where disputes relate to land restitution, competing claims, or historical dispossession, South Africa’s land-reform system provides dedicated institutions and procedures, including the Commission on Restitution of Land Rights and adjudication through the Land Claims Court (with further litigation routes where applicable). Informal and customary land rights are protected through statutory safeguards that require consent and lawful process before deprivation, and disputes on communal land therefore have formal legal routes in addition to community-level decision-making structures. Poor or rural communities without resources can lodge formal complaints or pursue cases related to land-use or tenure through government mechanisms, with state-funded legal support where needed. The Legal Aid South Africa Act establishes Legal Aid South Africa, a public body that provides free or subsidised legal representation and advice to people who cannot afford a lawyer. Legal Aid SA regularly assists with land, housing, and community-rights cases, including tenure and restitution disputes, and may represent

individuals or community groups before the Land Claims Court, Magistrates' Courts, or High Court, depending on the matter. In addition to Legal Aid SA, people can submit grievances or complaints to the Department of Agriculture, Land Reform and Rural Development, which handles land-tenure and restitution disputes, and the Public Protector, which investigates administrative injustice.

FSC-certified plantations

SBP recognises that FSC certification covers this indicator.

FSC-certified operations typically add an operational layer (documented stakeholder engagement and complaint handling within the management unit) that can make early resolution more likely, but sound external dispute-resolution routes exist regardless of certification.

Uncertified plantations

For plantations, the national mechanisms provide a sufficient minimum basis for this indicator, because there are defined routes to raise and escalate grievances on land use, water impacts and tenure claims, and there are competent authorities with enforcement and adjudicatory powers.

In practice accessibility and effectiveness depend on whether affected rights holders are clearly identified, informed in time, and able to participate, and whether suppliers can demonstrate that permissions, leases, community agreements and claim-status information are properly documented.

Trees Outside Forests Urban and Landscape (TOF)

This indicator is applicable to both urban areas and landscapes.

For trees outside forests and invasive-species clearing, the same tenure and administrative dispute mechanisms apply because clearing takes place on land with identifiable tenure and use-rights regimes and may require permissions and compliance with environmental and biodiversity controls. Disputes about who authorised access, who may use or remove biomass, and whether community use-rights were respected can arise if site authorisations and community interface are not consistently documented and communicated.

Where clearing is delivered through public employment-type programmes, programme rules commonly require workplace grievance procedures for participants, but tenure and land-use grievances still rely on the same external legal and administrative routes described above.

General outcome

The legal and institutional framework covers this indicator, but credible implementation does depend on the availability of site-specific evidence of rights holders, authorisations and access arrangements, and practical access to grievance/dispute channels.

Determining legal land and use rights is essential for resolving disputes; this is addressed in the first SBE legality indicator (specified risk).

A Stakeholder Engagement Plan and Comments and Complaints Procedure are obligatory SBP elements. Therefore, they are not treated as SBE risk-

	mitigation measures. Any stakeholders in our supply chain can contact our company to address sourcing-related issues.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	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.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	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.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu- Natal; Eastern Cape	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.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. ILO Convention No. 169: Countries that have not ratified (confirms South Africa is not a ratifying state) – https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:11310:0::NO:11310:P11310_INSTRUMENT_ID:312275:NO Interim Protection of Informal Land Rights Act (IPILRA) (consent requirement where informal/communal land-use rights would be deprived) – https://faolex.fao.org/docs/pdf/saf16337.pdf Restitution of Land Rights Act 22 of 1994 (restitution/claims framework) – https://www.gov.za/sites/default/files/gcis_document/201409/act22of1994.pdf Land Claims Court (adjudication route for restitution/land-rights disputes) –

	https://www.justice.gov.za/lcc/ Indigenous World 2020: South Africa (IWGIA; locates key San communities mainly in the Kalahari/Northern Cape and around Kimberley/Platfontein) – https://iwgia.org/en/south-africa/3593-iw-2020-south-africa.html Indigenous Navigator national survey report: South Africa (2024; locates Nama in Northern Cape and references Kimberley-area groups) – https://indigenounavigator.org/publication/report-of-the-indigenous-navigator-national-survey-south-africa National Environmental Management: Biodiversity Act 10 of 2004 (statutory basis for invasive-species duties and controls) – https://www.gov.za/documents/national-environmental-management-biodiversity-act-0 Alien and Invasive Species Regulations (NEMBA; duties/controls for listed invasive species) – https://www.gov.za/sites/default/files/gcis_document/201409/37885rg10244gon598.pdf Working for Water programme (public invasive-alien plant control programme relevant to clearing operations) – https://www.dffe.gov.za/working-water-wfw-programme
Risk Rating justification	In South Africa, the obligation to apply “FPIC” as a legal requirement is limited because South Africa has not ratified ILO Convention 169. There is no national legislation that specifically establishes “free, prior and informed consent” in connection with the transfer of forest management rights and customary rights. In practice, where Indigenous Peoples’ rights or comparable customary / community rights are relevant, the enforceable national and provincial approach is delivered through domestic constitutional rights and administrative-law safeguards, land-tenure and restitution mechanisms, and the permitting systems that require consultation, participation, conditions and remedies. The key legal and institutional building blocks are the Constitution (including equality, property and administrative justice), the Interim Protection of Informal Land Rights Act (which protects informal/communal land-use rights against deprivation without consent), the Restitution of Land Rights framework (Commission on Restitution of Land Rights and the Land Claims Court), and land-use, environmental, water and heritage authorisation systems that require affected-party engagement and provide appeal and review routes. Relevant authorities therefore include the land-reform and restitution institutions, the department responsible for land reform, the Department of Water and Sanitation for water-use licensing and compliance, the Department of Forestry, Fisheries and the Environment and provincial environmental authorities for environmental authorisations and compliance, and the heritage authority where culturally significant sites are implicated. There hardly any overlap between the territories of historically recognised Indigenous groups and the plantation forestry footprint, and the risk of violation of Indigenous Peoples’ rights by forestry activities is therefore low. Where rights are identified locally (for example, where communities or individuals self-identify and assert Indigenous-linked rights, or where

customary / community rights exist on communal land and are potentially affected by proposed activities), South Africa's system expects consultation and, where needed, accommodation through legally recognised processes: obtaining consent where informal rights would be restricted, negotiating access or benefit arrangements where appropriate, avoiding or redesigning activities, setting binding permit conditions, or using restitution/claims processes where the dispute concerns historic dispossession or contested rights.

FSC-certified plantations

SBP recognises that FSC certification covers this indicator.

FSC requires that, where Indigenous Peoples' rights are present and affected, a mutually agreed FPIC process is followed and binding agreements are concluded for delegated control of management activities, and it requires systematic identification and protection of high conservation values, including HCV 5 (community needs) where basic-needs resources are present. This can go beyond the legal minimum by making rights-holder engagement, documentation, and accommodation measures auditable within the management system even where national law relies more on general consultation and administrative remedies.

Uncertified plantations

For plantation forestry, the indicator is met at country level because rights-holder identification, consultation, dispute-resolution and remedy routes exist and are routinely used through the permitting and land-rights systems. The Indigenous-rights areas (or claimed areas) have nearly no overlap with plantations areas.

The practical requirement where rights are present is not an abstract national commitment but documented, site-specific proof that the relevant rights holders were identified, that consultation occurred in a form they can use, and that accommodations were implemented where consent was not achieved or where lawful restrictions of rights required negotiated remedies or binding conditions.

South Africa's commercial plantations are concentrated mainly in the eastern provinces (especially KwaZulu-Natal and Mpumalanga, with additional area in the Eastern Cape), while widely cited profiles of Khoe-San/San communities locate key groups mainly in the Kalahari/Northern Cape and around Kimberley, rather than in the main plantation belt.

Trees Outside Forests Urban and Landscape (TOF)

This indicator is only applicable to TOF landscapes.

For trees outside forests and invasive-species clearing, the same legal principles and institutions apply because clearing takes place on land with defined tenure regimes, including communal land, and may affect access and use rights (such as gathering, grazing, fuelwood access or control over biomass removal). National invasive-species control programmes and biodiversity duties do not remove the need to demonstrate that local tenure and use rights have been identified and respected before operations. This is

	considered part of legal compliance procedure.
Risk Rating	Low Risk

South Africa Mpumalanga; KwaZulu-Natal; Eastern Cape	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	FSC-certified plantations: Biomass delivered with FSC 100% claim. UNESCO World Heritage Convention, South Africa party status (UN Treaty Collection; lists South Africa ratification 10/07/1997) — https://treaties.un.org/pages/showDetails.aspx?objid=08000002800fece0 UNESCO 1970 Convention on illicit import/export/transfer of cultural property, South Africa party status (UN Treaty Collection; lists South Africa acceptance 18/12/2003) — https://treaties.un.org/pages/showdetails.aspx?objid=08000002801170ec UNIDROIT 1995 Convention on stolen or illegally exported cultural objects, South Africa accession and entry into force (UNIDROIT notice; deposit 09/01/2018, in force 01/07/2018) — https://www.unidroit.org/1995-unidroit-convention-on-stolen-or-illegally-exported-cultural-objects-deposit-of-the-42st-instrument-south-africa/ UNESCO 2001 Underwater Cultural Heritage Convention, South Africa party status (UN Treaty Collection; lists South Africa acceptance 12/05/2015) — https://treaties.un.org/pages/showdetails.aspx?objid=08000002802198d9 UNESCO 2003 Intangible Cultural Heritage Convention, South Africa party status (UN Treaty Collection; lists South Africa ratification 24/01/2025) — https://treaties.un.org/pages/showDetails.aspx?objid=080000028006656f National Heritage Resources Act 25 of 1999 (South African law; official PDF) — https://www.gov.za/sites/default/files/gcis_document/201409/a25-99.pdf World Heritage Convention Act 49 of 1999 (South African law; text and PDF download) — https://lawlibrary.org.za/akn/za/act/1999/49 South African Heritage Resources Agency (SAHRA) (authority overview; official site) — https://www.sahra.org.za/ SAHRIS, South African Heritage Resources Information System (public records and permitting platform) — https://sahris.org.za/home National Inventory Platform (SAHRA; portal for heritage comment and permits) — https://www.sahra.org.za/national-inventory/ SAHRA Minimum Standards for Heritage Specialist Studies / Heritage reports (heritage impact assessment expectations, screening, permitting) — https://www.sahra.org.za/Wordpress/wp-content/uploads/2020/01/Minimum_Standards_for_Heritage_reports_For_Public_Review.pdf SAHRA APM Guidelines, Minimum Standards for Archaeological and Palaeontological components of impact assessment reports (stop-work/report and permitting logic) — https://www.sahra.org.za/Wordpress/wp-content/uploads/2025/04/ASG2-2-SAHRA-APIAs-MIN-STDS-Ph1-2-

	16May07.pdf Cultural Heritage Survey Guidelines and assessment tools for Protected Areas in South Africa (DFFE; supports proactive identification/management in protected areas) — https://www.dffe.gov.za/sites/default/files/Pdf-Files/guidelines-and-policies/culturalheritagesurveyguidelines_protectedareas2016_0.pdf FSC National Risk Assessment for South Africa (2018) (FSC Connect; cultural heritage / HCV 6 assessment referenced) — https://connect.fsc.org/document-centre/documents/resource/255
Risk Rating justification	FSC-certified plantations SBP recognises that FSC certification covers this indicator. Uncertified plantations South Africa is party to core international cultural-heritage instruments, including the World Heritage Convention and related implementation instruments, the 1970 convention on illicit trafficking, the 1995 UNIDROIT convention, the 2001 underwater cultural heritage convention, and the 2003 intangible cultural heritage convention. Designated and legally protected heritage is governed mainly by the National Heritage Resources Act 25 of 1999, with additional controls for World Heritage Sites under the World Heritage Convention Act 49 of 1999. The competent authorities are the South African Heritage Resources Agency (SAHRA) and the Provincial Heritage Resources Authorities, with permitting and public records supported through SAHRIS and the National Inventory platform. The FSC National Risk Assessment for South Africa (2018) treated cultural heritage (HCV 6) as low risk for plantation forestry and describes established protection and industry practice, including heritage authorisations where graves or archaeological material occur and internal recording of grave sites in forestry operations, including on state land. For current operations, the main practical exposure is not intentional damage to designated sites but accidental disturbance of graves or archaeological material during harvesting support works, road works, firebreaks, or expansion. The legal control is permit-based and enforceable. SAHRA's published minimum standards for heritage specialist studies and impact assessment set the expectation that developments and ground-disturbing activities use screening, survey where needed, and permitting before disturbance. Designated cultural heritage sites are generally clearly identified and legally protected. The residual risk is concentrated in "chance finds" and in ground-disturbing works, not in routine plantation silviculture. Trees Outside Forests Urban and Landscape (TOF) This indicator is applicable to both urban areas and landscapes. The same National Heritage Resources Act protections apply. Municipal planning and development control commonly create earlier visibility of designated heritage constraints, and SAHRIS is a practical route for checking mapped sites and for heritage comment or permits where works trigger heritage procedures. Designated sites are known and development

	approvals are channelled through formal processes. The remaining concern is contractor-led tree work that includes excavation or other ground disturbance without heritage screening. For TOF landscape the operational risk is more sensitive to context because landscape restoration and invasive-alien clearing can be implemented through dispersed contractor teams and can involve heavy machinery, access-track creation, stump removal, ripping, or rehabilitation earthworks. Those are the activity types where accidental disturbance of heritage resources is most plausible if heritage screening is not done first. SAHRA's minimum standards and archaeological/palaeontological impact-assessment standards reflect this permitting and "stop work and report" logic. Where invasive-alien clearing is done inside or adjacent to protected areas or other formally managed landscapes, national cultural-heritage survey guidance for protected-area management reinforces the need for proactive identification and management of cultural heritage as part of land-management actions. Designated sites are protectable and usually findable through existing records, but the practical risk increases when landscape reconstruction involves ground disturbance in areas that have not been screened, especially under short-term contractor delivery models. In those cases the topic is a real operational concern and needs explicit pre-work checking and a functioning chance-find procedure rather than relying on "protected by default". Although this topic is practically not applicable for plantations and is low risk for TOF biomass (clearing invasive species), exceptional cases can be encountered. This underlines the importance of pre-harvest screening of sites for "areas of HCV", as required by indicator 2.1.1 (specified risk). The pre-harvest investigation of clearing projects and harvesting plots aims to identify any feature that could be of high conservation value, including sites of high cultural heritage value. Where unknown features are found, further investigation needs to be carried out and any required consultation or permitting is completed before work proceeds.
Risk Rating	Low Risk

Eswatini Whole country - FSC certified plantations	Indicator
4.2.7	Designated cultural heritage sites shall be preserved.
Supply Base Verifiers	Biomass delivered with FSC 100% claim.
Risk Rating justification	FSC-certified plantations. SBP recognises that FSC certification covers this indicator.
Risk Rating	Low Risk

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Eswatini
Area	Whole country - FSC certified plantations
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Biomass is only sourced from an inspected and approved group of FSC certified plantations. Biomass origin and supply chain are investigated. If any risks are identified, mitigation measures are agreed upon. For FSC-certified plantations, this report refers to the planted monocultures of eucalyptus, pine and wattle, not to other land within the estates. Grassland patches may occur within or between plantation compartments, but no biomass is sourced from those areas; they are therefore out of scope for biomass sourcing and for the EU RED Level B assessment for Eswatini. In general, online sources indicate that legality risks in Eswatini relate mainly to land-lease arrangements, payment of fees and taxes, and compliance with labour conditions, not to unlawful establishment or management of plantations. FSC-certified plantations address these risks through certification requirements, and independent NGOs regard FSC as an adequate mitigation measure to demonstrate compliance. FSC-certified plantations operate within the national legal framework and in coordination with the competent authorities. The primary wood is delivered with FSC 100% claim.
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The FSC-certified plantations in scope have demonstrated over successive rotations that stands are successfully re-established and cultivated. Their management plans are based on regeneration methods with a proven record under regional conditions. The primary wood is delivered with FSC 100% claim.
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity	

and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	This requirement is not applicable, as only FSC-certified plantations are in scope. These plantations were established legally and do not pose a threat to, or involve conversion of, areas designated for nature protection. The primary wood is delivered with FSC 100% claim.
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Harvesting on FSC-certified plantations in Eswatini (eucalyptus, pine, wattle) follows standard plantation practice, minimising soil disturbance and avoiding stump and root harvesting. Eucalyptus is felled and stumps are left to coppice; pine is clearfelled and replanted with stumps retained; wattle is harvested similarly to prevent erosion. Biodiversity values on these plantations are low, but any unexpected occurrence of protected species (flora and fauna) is handled according to best practice. The primary wood is delivered with FSC 100% claim.
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The FSC-certified plantations maintain their long-term production capacity. Growth in eucalyptus, pine and wattle plantations is supported by standard measures such as fertilisation at planting, weeding and thinning. The plantations in scope are assessed on previous and expected yield rates, which must not be in decline. The approved plantations show stable yields over successive rotations, and the current growth rates are as planned.

The primary wood is delivered with FSC 100% claim.	
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The FSC-certified plantations in scope do not contain, nor did they replace, primary forests or old-growth forests.
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The FSC-certified plantations in scope do not contain, nor did they replace highly biodiverse forest.
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(d) highly biodiverse grassland spanning more than one hectare that is: (i) natural, namely grassland that would remain grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.</i>	

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	FSC-certified plantations here means planted eucalyptus/pine/wattle compartments only; any grassland areas within the estates (often also referred to as "plantations") are outside the biomass sourcing scope and the EU RED Level B assessment. The tree plantations were established before January 2008. Most plantations in Eswatini were established a long time ago and there is currently no incentive to expand the plantation area. These plantations were created by converting marginal land that had a human-influenced grassland–savanna cover. However, this landcover could include native natural or semi-natural highly biodiverse grassland. The EU RED Level B assessment verifies the land-use history of each plantation. At present, only plantations established before January 2008 are included in scope. Checking the plantation's establishment date is the most straightforward way to demonstrate compliance with this indicator.
(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(e) heathland - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The FSC-certified plantations in scope do not contain, nor did they replace heathland.
(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:</i> <i>(a) wetlands, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).</i>	

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The FSC-certified plantations in scope do not contain, nor did they replace wetlands.
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The FSC-certified plantations in scope do not contain, nor did they replace peatland.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Not applicable, requirement only applies to Level A

LULUCF criteria 29(7)	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Carbon stock and sink of the FSC-certified plantations (above-ground, litter and below-ground) have been compared with historic data and projected over several rotations; the values remained stable. Forest plantations have an higher average carbon stock and sink than grassland-savanna.

Countries where EU RED Supply Base Evaluation is used	
Country	South Africa
Area	Mpumalanga; KwaZulu-Natal; Eastern Cape
Sustainable harvesting criteria 29(6)	
(i) The legality of harvesting operations	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Our company sources almost all feedstock from FSC-certified plantations, with only rare sourcing from non-certified plantations. The possibility to source biomass from landscapes overgrown with alien invasive species is considered. With “the plantations” this report considers the planted eucalyptus/pine/wattle compartments only. Any other lands within the estate (often also collectively referred to as “the plantations”) are outside the scope of the EU RED Level B assessment. As a limited exception, any future sourcing from overgrown sites would be restricted to areas that were already overgrown in January 2008. Sites that had EU RED-relevant characteristics in January 2008 (high-biodiversity forest or grassland, wetland, peatland, etc.) and have since become overgrown are non-compliant (see SBE specified-risk indicator 2.2.1.) In the Supply Base (three provinces in eastern South Africa), plantation legality is generally clear because plantations were established long ago and suppliers can demonstrate lawful land tenure or management rights and the relevant establishment approvals (primarily under the National Water Act, 1998 (DWS) and the National Environmental Management Act, 1998). The sustainability and procurement team verifies the establishment date, ownership/use rights, and water-use compliance for plantation forestry as a streamflow reduction activity; where plantations were later expanded, the team also verifies confirmation that the expansion was lawfully authorised under NEMA (including an environmental authorisation where required). No harvesting permits are required for commercial plantation timber. Compliance and traceability are supported by company- and plantation-specific documentation, biomass delivery notes, and accounting records. Biomass from plantations under communal or other non-title arrangements is very uncommon in the Supply Base and has not been encountered; if it occurs, the supplier would need to undergo additional verification and stakeholder engagement (see SBP specified-risk indicator 1.1.1).
(ii) Forest regeneration of harvested areas	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level

Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	All suppliers undergo an initial assessment covering legality, cultivation methods, and production levels over several rotations. The privately owned plantations in scope have demonstrated across successive rotations that stands are reliably re-established; management plans apply sustainable regeneration methods with a proven regional track record in the region. South Africa has no legal requirement to replant harvested plantation sites. Re-establishment is driven by plantation economics and is standard practice in private rotation/clear-fell systems. Legal controls are indirect, notably water-use regulation and land-care duties to prevent degradation. Evidence is assessed at supplier and operator level. No indications were found that private plantations in the Supply Base are failing to regenerate, but state-managed plantations have been reported to have replanting backlogs, linked in part to weak protection and timber theft. If sourcing from state-run plantations were ever considered (not foreseen), the initial supplier assessment would include enhanced online and site verification and stakeholder engagement focused on regeneration performance. See also SBP indicator 2.2.10 (regeneration), which is designated as specified risk for state-run plantations.
(iii) That areas designated by international or national law or by the relevant competent authority for nature protection purposes, including in wetlands, grasslands, heathland and peatlands, are protected with the aim of preserving biodiversity and preventing habitat destruction, unless evidence is provided that the harvesting of that raw material does not interfere with those nature protection purposes	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The plantations in scope were lawfully established (and, where applicable, lawfully expanded) and do not involve conversion of, or operations within, areas designated for nature protection. This is assessed in the initial supplier assessment under legality. South Africa has an established system for identifying and designating protected areas. In the Supply Base, production plantations do not overlap with designated protected areas.
(iv) that harvesting is carried out considering the maintenance of soil quality and biodiversity in accordance with sustainable forest management principles, with the aim of preventing any adverse impact, in a way that avoids harvesting of stumps and roots, degradation of primary forests, and of old growth forests as defined in the country where the forest is located, or their conversion into plantation forests, and harvesting on vulnerable soils, that harvesting is carried out in compliance with maximum thresholds for large clear-cuts as defined in the country where the forest is located, and with locally and ecologically appropriate retention thresholds for deadwood extraction and that harvesting is carried out in compliance with requirements to use logging systems that minimise any adverse impact on soil quality, including soil compaction, and on biodiversity features and habitats	

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Our suppliers were assessed compliant on this indicator. SBP requires ongoing monitoring of operational performance on soil quality and biodiversity. Monitoring is carried out by our sustainability specialists using checklists, with case studies recorded. Harvesting in plantation compartments (eucalyptus, pine, wattle) follows standard practice to minimise soil disturbance, with no stump or root harvesting. Eucalyptus is felled with stumps left to coppice; pine and wattle are clear-felled and replanted with stumps retained. Tops and branches are left on-site to protect soil and support fertility; mechanised harvesting and road planning are managed to avoid compaction/rutting and erosion. Soil protection is governed by CARA, NEMA, the National Water Act (sediment/runoff pollution prevention), and agrochemical controls, enforced by Environmental Management Inspectors and the water and agriculture authorities. Internet research identified discussion of possible improvement points on soil management in plantations, but did not find concerns related to non-conformance in general. Biodiversity values on these plantations are low and occurrences of protected flora or fauna are unlikely; pre-harvest inspections ensure that any findings are managed in line with protected-species requirements and best practice. See also SBP specified-risk indicators 2.1.1–2.1.3.
(v) That harvesting maintains or improves the long-term production capacity of the forest.	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The plantations in scope are assessed on previous, current and expected yield rates, and show stable production capacity over successive rotations. Growth in eucalyptus, pine and wattle plantations is supported by standard measures such as fertilisation at planting, weeding and thinning. Internet research did not identify publications reporting yield decline or harvesting practices that reduce long-term production capacity in private commercial plantations in the Supply Base. Reviews of yield data across successive rotations conclude that regular tree plantations do not have unsustainable yield rates. By contrast, significant production concerns have been reported for some state-managed estates in the eastern plantation belt, linked to delayed replanting/regeneration (unplanted backlogs), harvesting performance, timber theft, and natural disturbances (fire, pests, etc.). Our company has no plans to source biomass from these state-run

	estates. If this were considered, additional verification and stakeholder engagement would be required, including site-level evidence that harvested compartments are replanted on schedule, regeneration is successful, and the stands are effectively managed and protected. See also SBP specified-risk indicator 2.2.10 on the regeneration of harvest plots.
(vi)¹ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(a) primary forest and other wooded land and old growth forest, namely forest and other wooded land of native species, where there is no clearly visible indication of human activity and the ecological processes are not significantly disturbed; and old growth forests as defined in the country where the forest is located. If there is no definition of old growth forest at the national level, then the following definition shall apply: A forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The plantations in scope do not contain, nor did they replace, primary forests or old-growth forests.
(vi)² That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(b) highly biodiverse forest and other wooded land which is species-rich and not degraded, and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the production of that raw material did not interfere with those nature protection purposes.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The plantations in scope do not contain, nor did they replace highly biodiverse forest.
(vi)³ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:</i> <i>(d) highly biodiverse grassland spanning more than one hectare that is: (i) natural, namely grassland that would remain</i>	

grassland in the absence of human intervention and that maintains the natural species composition and ecological characteristics and processes; or (ii) non-natural, namely grassland that would cease to be grassland in the absence of human intervention and that is species-rich and not degraded and has been identified as being highly biodiverse by the relevant competent authority, unless evidence is provided that the harvesting of the raw material is necessary to preserve its status as highly biodiverse grassland.

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	With "the plantations" is meant the planted eucalyptus/pine/wattle compartments. All plantations were established before January 2008. Most plantations were established around the mid-20th century, and land suitable for plantation forestry in the Supply Base is already largely occupied; as a result, plantation expansions are rare and there is no economic incentive to expand plantation area. Our supplier assessment system verifies the land-use history of each estate. This includes the creation of new estates and the expansion of existing plantation areas. Only wood compartments established before January 2008 are included in scope. Confirming the establishment date can demonstrate conformity. See also SBE specified-risk indicator 1.1.1. Our company does not source biomass from grasslands. In case biomass from areas overgrown with alien invasive species will be considered, sourcing will be excluded from sites that in January 2008 still had EU RED-relevant land cover, such as highly biodiverse grassland.

(vi)⁴ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (3): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with a high biodiversity value, namely land that had one of the following statuses in or after January 2008, whether or not the land continues to have that status:

*(e) **heathland** - Biomass Producer shall use the official definition for Heathland used in the applicable feedstock origin country. In the absence of such a definition, then the following definition shall be applied: Vegetation with low and closed cover, dominated by bushes, shrubs, dwarf shrubs (heather, briars, broom, gorse, laburnum etc.) and herbaceous plants, forming a climax stage of development (Source: EU Copernicus).*

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	The plantations in scope do not contain, nor did they replace heathland.

(vi)⁵ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs.

Article 29 (4): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land with high-carbon stock, namely land that had one of the following statuses in January 2008 and no longer has that status:

*(a) **wetlands**, namely land that is covered with or saturated by water permanently or for a significant part of the year (NOTE: Evidence of verification of wetlands should reflect seasonal changes within a year).*

Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Any new plantation considered for sourcing is assessed against SBP and EU RED. The assessment is largely formal, as in practice all plantations were established before 2008. Title deeds confirm ownership history but do not prove the actual land cover around January 2008, so land-cover is verified with additional evidence such as historic satellite imagery or online data. In the case of pine, tree age can also confirm establishment before 2008, as rotations exceed 20 years. Wetlands (including peatlands) are regulated in South Africa under the National Water Act, 1998, which defines a wetland as a “watercourse” and links activities that alter flow, storage, or water quality to water-use controls. NEMA’s EIA regulations add a further layer of control by requiring environmental authorisation for specified activities in a watercourse or within the mapped buffer area. High-value wetland/peatland systems are also set aside in the protected-area network, including major complexes such as the iSimangaliso Wetland Park (UNESCO World Heritage Site).
(vi)⁶ That forests in which the forest biomass is harvested do not stem from the lands that have the statuses referred to in Article 29(3) points (a), (b), (d) and (e); Article 29(4), point (a), and Article 29(5), respectively under the same conditions of determination of the status of land specified in those paragraphs. <i>Article 29 (5): biomass fuel produced from agricultural biomass shall not be made from raw material obtained from land that was peatland in January 2008, unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil. For a peatland that was partially drained in January 2008, a subsequent deeper drainage, affecting soil that was not fully drained, would constitute a breach of the criterion.</i>	
Type of Risk Assessment used	☐ Level A – proof at national or sub-national level ☒ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	For the peatland indicator, the same verification method is applied. Title deeds confirm tenure; land cover around January 2008 is checked using historic imagery and online datasets. Peatlands occur in KwaZulu-Natal, Mpumalanga and the Eastern Cape. The national peatlands database records 635 locations. The main concentration is on the Maputaland Coastal Plain (KwaZulu-Natal). However, these peatlands, lie outside the eastern plantation belt.
(vii) that installations producing biomass fuels from forest biomass, issue a statement of assurance, underpinned by company-level internal processes, for the purpose of the audits conducted pursuant to Article 30(3), that the forest biomass is not sourced from the lands referred to in point (vi).	
Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	N/A
Level B management system at the level of the forest sourcing area	Not applicable, requirement only applies to Level A

LULUCF criteria 29(7)

Type of Risk Assessment used	☒ Level A – proof at national or sub-national level ☐ Level B – management system at forest sourcing area level
Level A risk assessment description	SBP-endorsed REDII Level A risk assessment for Article 29(7) LULUCF
Level B management system at the level of the forest sourcing area	N/A

Annex 2a: EU RED II Supply Base Evaluation

Annex 3: SBP Processing residues and/or Post-consumer feedstock requirements

☐ Not Applicable (Processing Residues and/or post-consumer feedstock not used)

Verification and monitoring of suppliers

Our company verifies its suppliers of processing residues. Every supplier signs an SBP & EU RED self-declaration and is visited and evaluated. Every type of biomass of each supplier is assessed separately (comprehensive checklist).

When needed, risk mitigation measures are agreed upon with suppliers. This evaluation is performed once a year and more often if risks were identified (and are mitigated).

Feedstock inspection and classification upon receipt

EU RED compliance for all types of biomass is verified before and during procurement. Our company maintains a list of approved suppliers and their assessed biomass categories to facilitate verification of delivery documents and invoices.

Upon delivery, the correct biomass type is visually checked. If there are supply chain risks, a reference sample may be retained. Procurement and acceptance of EU RED-compliant biomass is systematically documented.

Supplier audit for processing residues and post-consumer feedstock

All processing residues within the scope of EU RED evaluations are inspected at their point of first occurrence. The biomass and the processes generating the residues or wastes are assessed. The evaluation reports are stored together with the collected documents and photos.

It is also checked whether the supplier is intentionally producing biomass resembling “residues,” for example by grinding primary feedstock with equipment onsite. Such practices are not permitted.

Annex 4: EU RED detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no EU RED sustainability requirements apply, only the GHG savings criteria apply (SBP EU RED Bridging ID v2.0 Section 1.1). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).

Country: South Africa - Mpumalanga; KwaZulu-Natal; Eastern Cape

Not Applicable - only urban and landscape feedstock is used

Country: Eswatini - Whole country - FSC certified plantations

Not Applicable - only urban and landscape feedstock is used

Annex 4a: RED II detailed findings for Trees Outside Forest (TOF) feedstock

NOTE: For “Trees outside forests (TOF) – Urban and landscape feedstock” no REDII sustainability requirements apply, only the GHG savings criteria apply (SBP REDII Bridging ID Section 4.2). The land use category in this case is neither forest land nor agricultural land. For “Trees outside forests (TOF) – Agricultural land feedstock” the applicable criteria are Article 29 paragraphs (2)-(5).