



Supply Base Report:

HUNG THANH NGAN COMPANY
LIMITED

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
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1 Overview

Producer name:	HUNG THANH NGAN COMPANY LIMITED
Producer address:	Lot CI-6, Long My Industrial Park, Quy Nhon Tay Ward, 55125 Gia Lai Province, Viet Nam
SBP Certificate Code:	SBP-13-94
Geographic position:	13.737600, 109.265300
Primary contact:	Giang Ho Thi Truc, +84329378871, trucgiangnguyetanh@gmail.com
Company website:	
Date report finalised:	06 Jun 2026
SBR reporting period from:	01 Jun 2025
SBR reporting period to:	31 May 2026
Name of the Certification Body:	Preferred by Nature OÜ
Certification Body Approval date:	16 Sep 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 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, Instruction Document Japan: Bridging Requirements for meeting Japanese sustainability, legality and GHG saving requirements v1.2
Feedstock origin (countries)	Viet Nam (Dak Lak province and Gia Lai province)
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

- Hung Thanh Ngan Co., Ltd. operates in two main business segments: wood pellet and wood chip manufacturing. The factory is located at Lot CI-6, Long My Industrial Park, Quy Nhon Tay Ward, Gia Lai Province, Vietnam. It started operations in March 2019, initially producing wood chips, and later expanded into wood pellets in August 2025. All raw material used are acacia and eucalyptus wood log, not used sawdust and recycle wood.

- The company intend to source FSC 100%, FSC CW/controlled material from smallholders and mitigate the risk as described in Regional Risk Assessment for Vietnam Forest v1.0. They will be used as SBP- Compliant feedstock.

- In case, the company source FSC 100%, FSC CW/controlled material from smallholders without mitigate the risk as described in Regional Risk Assessment for Vietnam Forest v1.0. They will be used as SBP-Controlled Feedstock.

Products included in the scope of SBP Certification: WB 1.1 Wood pellets

Number of employees: 76

Annual maximum production capacity (metric tonnes): 60000

Number of direct feedstock suppliers: 123

Approximate number of feedstock sub-suppliers: 0

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

- Raw materials are harvested from the forest and transported directly to the factory in the form of logs, not collected at other locations.

- Trucks carry raw materials through the factory's weighing station to determine the volume, then are transferred to the chipper area.

- Raw materials used in production are stored in the yard in the form of chips.

- During the production process, wood pellets are stored in the factory's warehouse and rent an external warehouse. When there is an order to ship, pellets are transported by container truck in the form of bulk cargo and loaded directly onto vessel.

2.2 Detailed description of the Supply Base

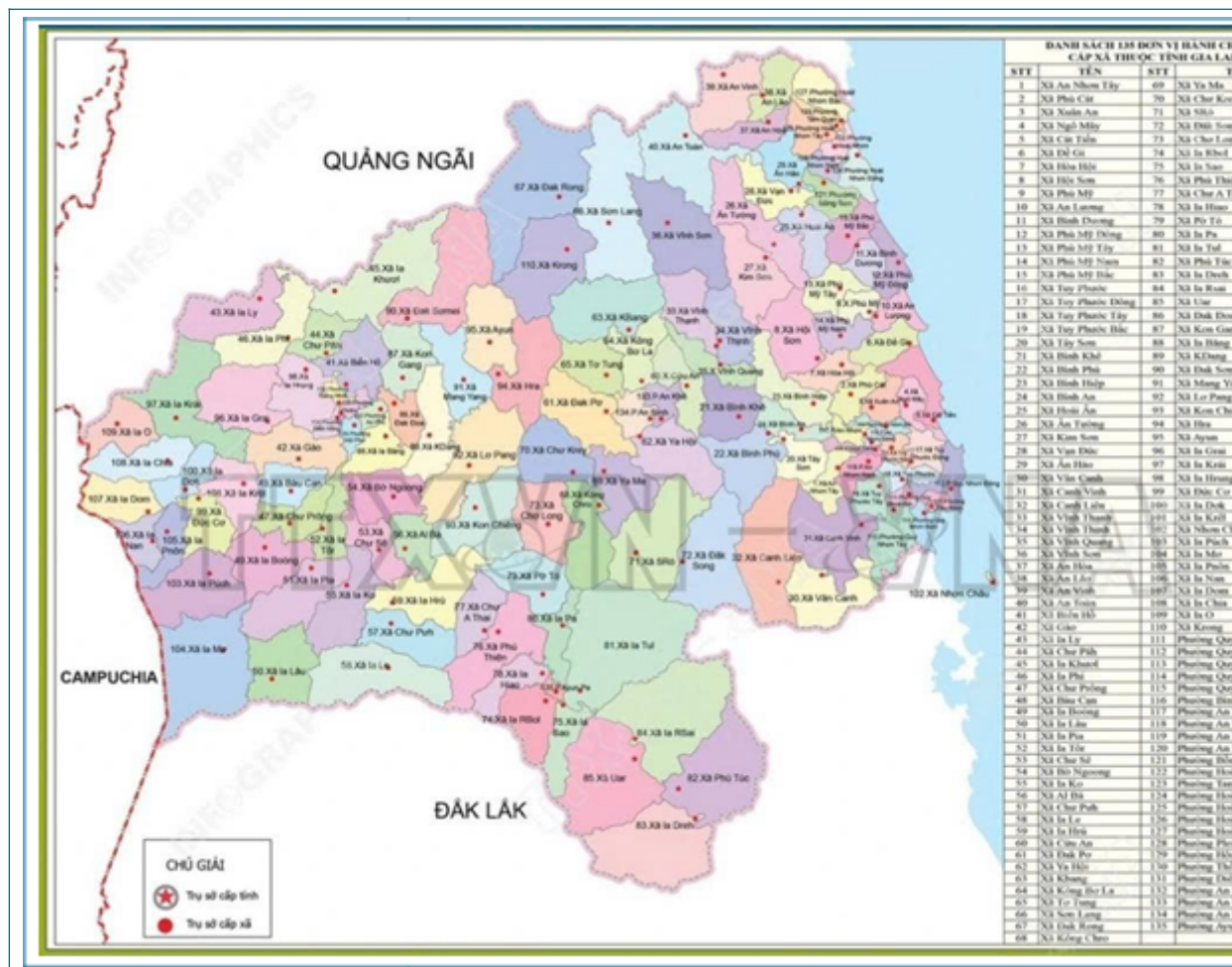
Guidance: Tables below have been generated automatically for each sourcing country based on the selection of 'Feedstock origin (countries)' in section 1 above.

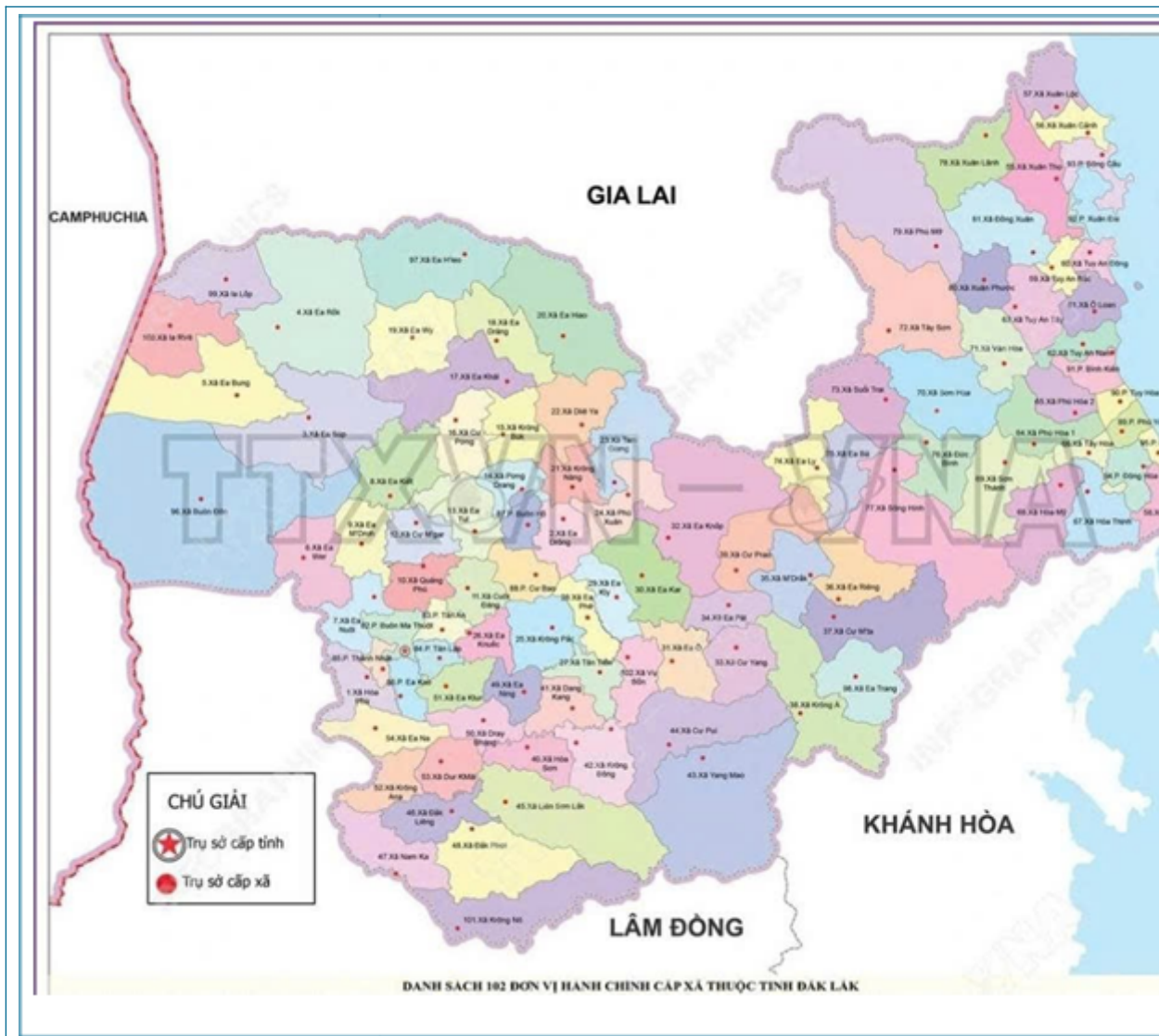
Annex 1 is generated by the system if the SBP SBE is used without Regional Risk Assessment(s) (RRAs). In case RRA(s) is used, further details shall be given only in section 3 below.

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

Country	Viet Nam
Area/Region	Dak Lak province and Gia Lai province

Exclusions	
Feedstock types	Primary feedstock
Feedstock Product Groups	Forest feedstock (1A)
Feedstock inputs	SBP Compliant feedstock , SBP Controlled feedstock
Is the forest managed to supply energy and non-energy markets?	Yes - Majority
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 – Regional Risk Assessment (RRA) used
Provide a concise summary of why a SBE was determined to be required or not required here:	
Because the feedstock is primary and product SBP-compliant claims, company use RRA for Viet Nam and Risk management for Specified risks.	
Feedstock types included in SBE:	Primary feedstock
Includes EU RED SBE:	Yes
Includes EU RED II SBE grandfathering	No
Includes EU RED TOF:	No
Includes EU RED II TOF grandfathering	No
Size of Supply Base area (million ha):	0.5100
Map(s) of the Supply Base area:	





2.3 Feedstock information

- a. **Total volume of Feedstock:** 1-200,000 tonnes
- b. **Volume of primary feedstock:** 1-200,000 tonnes
- c. **List of all the species in primary feedstock, including scientific name:**

Acacia spp	Acacia
Eucalyptus spp	Eucalytus

- d. **Was the feedstock used in the biomass removed from a forest as part of a pest/disease control measure or a salvage operation?** No
Explanation: All raw materials are harvesting from production forests.
- e. **Hardwood (i.e. broadleaf trees): specify proportion of feedstock from (%):** 100.00
- f. **Softwood (i.e. coniferous trees): specify proportion of feedstock from (%):** 0.00
- 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 issued by a body exercising functions of a public nature and issued for use by sawmills in the area in which 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:** Planted Forest
- 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:** 0
Physical form of the feedstock: N/A
- n. **Share of SBP-recognised system claim for processing residues:**
- o. **Volume of post-consumer feedstock:** 0
Physical form of the feedstock: N/A
- p. **Estimated amount of EU RED-compliant sustainable feedstock that could be collected annually by the BP:** 140000 tonnes
- q. **What is the estimated amount of EU RED-compliant sustainable feedstock that could be harvested annually in a Supply Base (estimated):** 6000000.00 tonnes
Explanation:

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

Gia Lai province and Dak Lak province are the two main sources of raw materials for Hung Thanh Ngan.

- Gia Lai Province features an expansive territory stretching from the mountainous Central Highlands down to the Central coastal region, with a diverse topography that encompasses mountains, plateaus (with an average elevation of 700–800 meters above sea level), and a coastal alluvial plain.

- + The province's total forested land area exceeds 986,613 hectares, maintaining a stable forest cover rate of 45.72%. Within this structure, natural forests hold the dominant share at over 692,091 hectares, concentrated primarily in nature reserves, national parks, and protection forest management boards. Meanwhile, the commercial plantation forest system, which directly supplies raw materials to the export processing chain, reaches over 294,522 hectares.

- + Aiming for forest sustainability, Gia Lai Province is aggressively developing forests that meet sustainable management certification, currently totaling over 13,330 hectares. This FSC-certified area is broken down into approximately 11,663 hectares of commercial plantation forests (mainly fast-growing species like Acacia), 1,450 hectares of strictly protected natural forests, and about 217 hectares of naturally regenerated assisted areas or riparian buffer zones.

- Similar to Gia Lai, Dak Lak Province also spans a long expanse from the mountainous Central Highlands to the Central coastal region, bridging mountainous plateau terrains with the coastal plain.

- + The total forested land area across the province has now reached 743,171 hectares, raising the provincial forest cover rate to 41.06%. Within this new forestry structure, natural forests are prioritized with approximately 530,000 hectares, while the commercial plantation forest system has developed robustly to around 212,000 hectares (including traditional forestry trees such as acacia and eucalyptus, as well as rubber trees and specialty crops that meet forest classification criteria).

The information on Size of Supply Base area (million ha) is only from plantation.

- + The entire province has developed and maintained nearly 4,000 hectares of plantation forests certified under international sustainable standards (FSC) and the National Forest Certification Scheme (VFCS/PEFC), largely concentrated in supply chain linkage models within M'Drak District.

- The suppliers are farmers that identified 15 specified risks indicators for small forest owners for all plantation. If the species are not rubber, there have 13 specified risks indicators (SBP Interim Regional Risk Assessment for Vietnam Forest SBP-RRA-AS-VN-FOR v1.0). We only use acacia and eucalyptus, therefore, we only need to mitigate 13 specified risks indicators.

3.2 Conflicts with applicable national and sub-national legislation

Forest planting and harvesting in Dak Lak and Gia Lai always comply with all laws and regulations of the Vietnamese government and local authorities.

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: Viet Nam	
Area/sub-scope: Small forest owner	
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:	
Vietnam has adequate legal regulations covering all supply base and biomass production activities. However, the implementation of legal rules for some aspects is still inadequate (based on the analysis in the relevant indicator), so this indicator is considered a risk identified for all smallhouse plantation.	
Mitigation measure:	
Controlled material - Land Use Right Certificate or equivalent - The management contract or other agreements with the owner shall indicate clear management rights. - Valid business registration documents shall exist if supplier is company. - nspections of harvesting sites shall confirm that harvesting takes place within property limits (including felling, extraction, and log landings). - Stakeholder consultation. - Site verification	

Monitoring and outcomes:

- Document reviewing: All forest-planting households possess land use rights certificates/land use right certificates/harvesting applications with local government confirmation or mining contracts with the commune/district.
- Field inspection: Company purchasing staff conduct surprise inspections of some forest-planting households at times before, during, and after harvesting.
-> No cases of illegal logging were detected; forest owners harvested within the scope stipulated in their land use right certificates (including felling, harvesting, and clearing of timber).
- Consultation with relevant parties: The company did not detect any violations of current laws and regulations.
- Monitoring: We implement the internal monitoring system to ensure the mitigation measures are implemented, use latest version of RRA for Viet Nam (if any updated). The material that comes from the FMUs that the specified risks are not mitigated will be excluded.

Low risk

Country: Viet Nam

Area/sub-scope: Small forest owner

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:

1.1.2 Legal ownership of land and resource use rights shall be respected.

Description of the specific risk:

The supply of timber raw materials in Vietnam is mainly from production forests, of which the majority of production forests have been allocated to households for management. However, with a large number of

small forest owners (>1 million), the issuance of land use right certificates has yet to be fully implemented, so this indicator is considered a definite risk for small forest owners.

Mitigation measure:

Controlled materials :

- Document reviewing: Checking land use right certificates (LURCs), land title deeds, or equivalent documents

- On-site inspection

Consultation with relevant parties

Monitoring and outcomes:

- Document reviewing: The forest owners has land use right certificates (LURCs), land title deeds, or equivalent documents.

- Consultation with relevant parties: Through consultation, it was found that the issuance of land title deeds and land use right certificates has not been completed for the entire area of production forests in these two raw material zones. However, all households planting forests to supply raw materials to the company have land title deeds, land use right certificates, or applications for forest confirmation with confirmation from the commune.

- Field inspection results: The company found no boundary or land disputes at the forest sites of the households surveyed and consulted with relevant parties.

- Monitoring: We implement the internal monitoring system to ensure the mitigation measures implemented, use latest version of RRA for Viet Nam (if any updated). The material come from the FMUs that the specified risks are not mitigated will be excluded.

Low risk

Country: Viet Nam

Area/sub-scope: Small forest owner

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:

1.1.3 Feedstock shall be legally harvested, supplied and produced, including in compliance with CITES, EUTR and other applicable legal trade requirements.
Description of the specific risk: The primary feedstock in Vietnam is mainly sourced from planted production forests. The main species used for forest plantations include Acacia, Eucalyptus and Rubber, which are in the list of major forestry species (Circular 22/2021/TT-BNNPTNT dated 29/09/2021) and not listed under CITES. Harvesting permits are required for state-owned forest owners but not for households and individuals, while forest product inventory is mandatory for all forest owners. In practice, state owned organizations fully comply with the requirements for approving harvesting plans and forest product inventory. Smallholders mainly sell standing trees to intermediaries or traders. Therefore, filling in the forest product inventory is delegated or assigned to intermediaries or traders. Intermediaries or traders are not allowed to fill in the forest product inventory, which does not comply with current laws (Circular 26/2022/TT-BNNPTNT and Circular 22/2023/TT-BNNPTNT). In addition, the implementation and control of forest inventory for private forest owners has yet to be fully implemented. Therefore, specific risks are identified for feedstock originating from small forest owners and private organizations related to the requirement of forest inventory.
Mitigation measure: Controlled materials : - Check CITES and EUTR lists - Consult with relevant parties Inspect the site to determine if the species to be purchased, or the timber collection area, is on the CITES list to implement appropriate zoning and harvesting methods
Monitoring and outcomes: - The company only purchases acacia and eucalyptus timber from plantation owners. Acacia trees and Eucalyptus must be identified as not being on the CITES and EUTR lists. - When harvesting, plantation owners must notify the local authorities (commune/district People's Committee) and prepare a timber inventory list for each truckload as required by Circular No. 26/2022/TT-BNNPTNT. - The company conducts checks on land ownership certificates, land use right certificates, logging applications, and timber product lists from timber suppliers. - Consultation with relevant parties: Local authorities and forest rangers regularly monitor and inspect the planting, harvesting, and transportation of timber at planted forest households. No violations of current laws and regulations have been recorded in the commune/district. - Monitoring: We implement the internal monitoring system to ensure the mitigation measures are implemented, use latest version of RRA for Viet Nam (if any updated). The material that comes from the FMUs that the specified risks are not mitigated will be excluded. Low risk

Country: Viet Nam
Area/sub-scope: Small forest owner
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:	
Although Vietnam has adequate legal regulations and effective mechanisms for managing forest and wetland land use, from 2006 to 2014, the conversion of depleted natural forests into plantation forests took place on a large scale legally. There are still sporadic illegal forest conversions to date. The loss of mangrove forests and peatlands has also occurred significantly. Therefore, this indicator is assessed as a specified risk.	
Mitigation measure:	
- Check land title certificate, land use rights certificate, or equivalent documents - Consult with relevant parties	
Monitoring and outcomes:	
- Check land title certificate, land use rights certificate, or equivalent documents - Consult with relevant parties: The forest is assigned by the government to households for self-management and cultivation, is identified as production forest, not forest converted to other land use purposes, and the specific area is determined. No peatland, wetland in the supply base. - Monitoring: We implement the internal monitoring system to ensure the mitigation measures are implemented, use latest version of RRA for Viet Nam (if any updated). The material that comes from the FMUs that the specified risks are not mitigated will be excluded.	
Low risk	

Country: Viet Nam
Area/sub-scope: Small forest owner
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:	
2.2.3 Soil quality in the Supply Base shall be maintained or enhanced	
Description of the specific risk:	
Although Vietnam has regulations to limit the negative impacts of forestry production activities, implementing sustainable forest management plans is optional for all forest owners. The short forest planting rotation and the widespread burning of vegetation can negatively impact soil quality. Therefore, this indicator is assessed as a specified risk	
Mitigation measure:	
Controlled materials: - Consultation with stakeholders - On-site inspection of logging operations - Interviews with forest owners	
Monitoring and outcomes:	
- On-site inspection of logging operations: -> No landslides or soil erosion were detected. The logging process always ensured environmental hygiene, without affecting the soil or polluting water sources. After logging, workers cleaned the area and collected waste. Logging residues were collected and transported to a processing site, the soil was tilled to remove stumps, and the remaining organic matter (leaves, small branches) was chopped and evenly distributed. - The forest-planting households committed to not using harmful chemicals, not applying fertilizer during the planting process, only applying a base fertilizer of organic fertilizer, phosphorus fertilizer, and NPK fertilizer for the first time. In addition, inspections of some planted forests did not detect gasoline or engine oil on the soil surface. - Consultation with stakeholders: Local authorities require forest-planting households to ensure hygiene in the harvesting area, avoid impacting the ecosystem of flora, fauna, and microorganisms, and protect the soil and water environment. Regularly disseminate information and encourage clearing of tree stumps by digging and tilling, avoiding burning undergrowth, which causes landslides, erosion, environmental pollution, and easily leads to forest fires. They confirmed that some households still collect and burn harvesting residues because the cost of labor for cleaning is quite high and time-consuming. However, this only accounts for a very small percentage and they collect and burn in small batches.	

- Monitoring: We implement the internal monitoring system to ensure the mitigation measures are implemented, use latest version of RRA for Viet Nam (if any updated). The material that comes from the FMUs that the specified risks are not mitigated will be excluded.

Low risk

Country: Viet Nam

Area/sub-scope: Small forest owner

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
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- ☐ 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:

Although Vietnam has a Forestry Law regulating permitted or prohibited forestry activities and regulations on sustainable forest management, there are no effective legal regulations specifically for the treatment of post-harvest residues and the situation of uncontrolled burning of vegetation after harvesting is still ordinary, so this index is assessed as a definite risk.

Mitigation measure:

Controlled materials:

- Consult with stakeholders
- Site verification

Monitoring and outcomes:

- The company conducts inspections of planted forests.
- Consultations with stakeholders:

The forest area owned by households is small scale. The forest owners do not burn the slashes or controlled burning applied as the government regulations. To date, no negative impacts on the soil

ecosystem have been recorded in the area.

- Monitoring: We implement the internal monitoring system to ensure the mitigation measures are implemented, use latest version of RRA for Viet Nam (if any updated). The material that comes from the FMUs that the specified risks are not mitigated will be excluded.

Low risk

Country: Viet Nam

Area/sub-scope: Small forest owner

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:

Vietnam has complete regulations to protect water resources in general and the forestry sector. In general, forestry activities have little impact on water resources. H

Controlled materials:

- Stakeholders consultation

Site checking however, afforestation encroaching into protected areas along stream buffer zone is still quite common in forests managed by smallholders. Therefore, this indicator is considered a specified risk for smallholder.

Mitigation measure:

Controlled materials:

- Stakeholders consultation
- Site checking

Monitoring and outcomes:

- Inspect the planted forests on-site and Consult with relevant parties:

The planted forest households in the locality are located far from the protection forest, there is no encroachment on the conservation area along the stream buffer zone, there are no large rivers or groundwater sources, only some areas have small streams. When harvesting, ensure that waste or large branches generated from harvesting do not clog the water source.

- Monitoring: We implement the internal monitoring system to ensure the mitigation measures are implemented, use latest version of RRA for Viet Nam (if any updated). The material that comes from the FMUs that the specified risks are not mitigated will be excluded.

Low risk

Country: Viet Nam

Area/sub-scope: Small forest owner

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:

Forest fire management has completed legal regulations and implementation mechanisms, but smallholders do not fully implement these regulations due to limitations in awareness, knowledge and techniques. Regarding pest management, although there are regulations and technical procedures, all forest owners yet to have not effectively implemented them

Mitigation measure:

Controlled materials:

- Consultation with stakeholders
- On-site inspection of logging sites
- Interviews with forest owners

- On-site inspection of planted forests

Monitoring and outcomes:

- Interviews with forest owners and Consultation with stakeholders:
- Forest owners committed to implementing fire prevention and control measures:
 - + Before burning, they must notify the village head, hamlet head, or forest fire prevention and control team. During burning, they must assign guards and have sufficient equipment to extinguish fires if they spread into the forest; after burning, they must extinguish all embers.
 - + Inspect and clean up the forest; collect flammable materials under the forest canopy, and adjust and supplement fire warning signs and fire prohibition signs.
 - + Prepare firefighting equipment (hoes, shovels, fire extinguishers, and hoses)
- Limit burning undergrowth after logging. If burning occurs, collect and burn in small patches.
- Report fires to the commune/district People's Committee and local forest rangers promptly for firefighting.
- Local authorities regularly monitor and implement forest fire prevention and control measures:
- Conduct awareness campaigns and training to improve people's understanding of fire prevention and control.
- Forecast forest fire risks according to season.
- Inspect and control people entering and leaving the forest, and manage the use of fire in the forest.
- Have a fire prevention and firefighting force that is trained and professionally qualified in forest fire prevention and control, and organize a permanent, ready force to meet on-site firefighting requirements.
- Establish a forest fire safety inspection team on a regular and ad hoc basis.
- Forest fire prevention and control is an important task and is given attention by all levels of government from the central to local levels. Forest fire prevention measures are always fully and strictly implemented by local authorities and forest-planting households. No forest fires have been recorded in the localities in the past two years.
- Monitoring: We implement the internal monitoring system to ensure the mitigation measures are implemented, use latest version of RRA for Viet Nam (if any updated). The material that comes from the FMUs that the specified risks are not mitigated will be excluded.

Low risk

Country: Viet Nam

Area/sub-scope: Small forest owner

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:	
Vietnamese law has policies and regulations on vocational training and education for small and medium-sized enterprises in all production sectors. Training facilities in the forestry sector are provided for university-level workers and workers nationwide. However, training and technical and occupational safety guidance for enterprise workers has yet to be fully implemented. For small forest owners, production activities are mainly based on practical experience without training. Therefore, this indicator is assessed as a specified risk.	
Mitigation measure:	
Controlled materials: - Consultation with stakeholders - On-site inspection of logging operations - Interviews with forest owners and logging workers	
Monitoring and outcomes:	
- On-site inspection of planted forests - Interviews with forest owners and Consultation with stakeholders: - Regarding personal protective equipment: + Interviews with forest owners confirmed that they had provided sufficient personal protective equipment (helmets, gloves, shoes) to workers before logging and required their use throughout the logging process. In addition, some forest owners also prepared simple first-aid kits for logging workers. + Interviews with representatives of the worker groups: they confirmed that they received and used all necessary personal protective equipment throughout the logging process. + The company conducted surprise inspections of the logging areas. No cases of workers not using personal protective equipment were detected. - Regarding occupational safety instructions: + Forest owners and team leaders independently instructed their workers on safety requirements during logging. In addition, company representatives conducting site surveys also disseminated safety requirements to forest owners and workers. Throughout the logging process, staff conducted surprise inspections in several forest areas to ensure these regulations were followed. To date, no serious work accidents have been recorded. + Interviews with forest owners confirmed that they closely monitored the logging process to ensure the safety of the workers and to promptly handle any adverse situations. + Interview with local authorities: Before logging, local authorities require forest owners to implement safety measures and provide personal protective equipment for loggers. In addition, forest rangers conduct several inspections to ensure compliance. In the last 2-3 years, there have been no serious work accidents in the area. - Monitoring: We implement the internal monitoring system to ensure the mitigation measures are implemented, use latest version of RRA for Viet Nam (if any updated). The material that comes from the	

FMUs that the specified risks are not mitigated will be excluded.
Low risk

Country: Viet Nam	
Area/sub-scope: Small forest owner	
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:	
Vietnam has specific legal regulations on implementing protective measures that must be applied to protect the health and safety of workers. Statistics from the Ministry of Labor, War Invalids and Social Affairs also show that the number of occupational accidents in the forestry industry has been insignificant in the last three years. However, There has been no comprehensive assessment of the implementation of occupational safety and hygiene regulations in forestry, so this indicator is assessed as a specified risk for all subsopes.	
Mitigation measure:	
Controlled materials: - Consultation with stakeholders - On-site inspection of logging operations - Interviews with forest owners and logging workers	
Monitoring and outcomes:	
- On-site inspection of planted forests - Interviews with forest owners and Consultation with stakeholders: + Forest owners confirmed that personal protective equipment was provided before logging, and logging workers also confirmed that they received it in full. In addition, the company provided guidance on safety	

regulations and logging procedures to forest owners and logging workers.

+ Interviewing local authorities: Before logging, forest owners report the use of labor to the local commune-level authorities and commit to compliance. Local authorities disseminate information and guide people on safe logging practices through loudspeakers and community meetings. In addition, local forest rangers conduct surprise inspections to ensure that regulations and procedures are implemented correctly and fully.

- Monitoring: We implement the internal monitoring system to ensure the mitigation measures are implemented, use latest version of RRA for Viet Nam (if any updated). The material that comes from the FMUs that the specified risks are not mitigated will be excluded.

Low risk

Country: Viet Nam

Area/sub-scope: Small forest owner

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:

4.2.4 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.

Description of the specific risk:

Regarding traditional customary ownership, the State always has a preferential policy for local communities and ethnic minorities in granting forest land use rights. The legal use rights according to traditional customs of local communities are also protected by the provisions of the Forestry Law and Circular 28/2018/TT BNNPTNT, Circular 13/2023/TT-BNNPTNT on sustainable forest management. Still, the identification of forests with significance in customs, practices and beliefs has only been well implemented by forest owners who are state organizations. For forest owners who are private organizations or small forest owners, the identification of forests with significance in customs, practices, and beliefs has yet to be fully implemented or has only stopped at the identification stage without solutions to ensure respect for traditional use rights. Thus, this indicator is assessed as low risk for state organizations and specified risk for private organizations and small forest owners

Mitigation measure:
Controlled materials: - Consultation with stakeholders - Interviews with local people
Monitoring and outcomes:
- Characteristics of the raw material source + Gia Lai Province: Ethnic minorities account for approximately 740,000 people , 24% of the total provincial population, mainly concentrated in high mountainous areas (such as An Lao, Van Canh, Vinh Thanh districts). They are predominantly composed of the Gia Rai, Ba Na, and Cham ethnic minorities + Dak Lak Province: Ethnic minorities account for approximately 25.3% of the total provincial population, mainly concentrated in high mountainous areas (such as Cu M'gar, Ea H'leo, Krong Nang, Dong Xuan, Son Hoa, Song Dinh districts). They are predominantly composed of the E De, Nung, Tay, Ba Na and Gia Rai ethnic minorities. - Interviewed with local people and stakeholders: + Through consultation with relevant parties and consultation with local people, the process of planting and harvesting forests does not affect the beliefs and living environment of the mountainous ethnic communities, and the religious beliefs of these ethnic groups are preserved. + Some households planting forests and supplying raw materials to the company are ethnic minorities, and they confirmed that planting and harvesting acacia and eucalyptus helps improve their economic lives and creates jobs for ethnic minorities in the locality. The commune supports the contract farming and facilitates planting and harvesting under the supervision of local forest rangers. - Monitoring: We implement the internal monitoring system to ensure the mitigation measures are implemented, use latest version of RRA for Viet Nam (if any updated). The material that comes from the FMUs that the specified risks are not mitigated will be excluded.
Low risk

Country: Viet Nam
Area/sub-scope: Small forest owner
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-RRR-EU-NO-FOR_v1.0 RRA for Norway FOR_Interim ☐ Biomass Producer's own risk assessment
Indicator with specified risk:	
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.	
Description of the specific risk:	
Although Vietnam has regulations related to the mechanism for resolving complaints and disputes over forest ownership and use rights, implementing those regulations and mechanisms is still inadequate and ineffective, so this indicator is considered a specified risk for all sub-scope groups.	
Mitigation measure:	
Controlled materials: - Consultation with relevant parties - Company complaint procedure	
Monitoring and outcomes:	
- Consultation with relevant parties: + Local authorities confirm that for planted forest households, the locality has allocated land to people for planting and harvesting under the supervision of the local People's Committee and forest protection agency. The issuance of land use right certificates has not been fully implemented; however, the commune has signed confirmations for applications for harvesting from households that have not yet been issued land use right certificates. The commune/district has established a mechanism for resolving complaints and disputes, but has not yet received any complaints related to disputes over planted forest area. - Monitoring: We implement the internal monitoring system to ensure the mitigation measures are implemented, use latest version of RRA for Viet Nam (if any updated). The material that comes from the FMUs that the specified risks are not mitigated will be excluded.	
Low risk	

Country: Viet Nam	
Area/sub-scope: Small forest owner	
Risk Assessment used:	
	☒ SBP-RRR-AS-VN-FOR_v1.0 RRA for Vietnam FOR_Interim ☐ SBP-RRR-US-NF-FOR_v1.0 RRA for US National FOR_Interim ☐ SBP-RRR-US-PF-FOR_v1.0 RRA for US Private FOR_Interim ☐ SBP-RRR-EU-DK-FOR_v2.0 RRA for Denmark FOR_Endorsed ☐ SBP-RRR-EU-DK-TOF_v1.0 RRA for Denmark TOF_Interim ☐ SBP-RRR-EU-EE-FOR_v2.0 RRA for Estonia FOR_Endorsed ☐ SBP-RRR-EU-LV-FOR_v2.0 RRA for Latvia FOR_Endorsed ☐ SBP-RRR-EU-LT-FOR_v2.0 RRA for Lithuania FOR_Endorsed ☐ SBP-RRR-CA-QC-FOR_v2.0 RRA for Quebec FOR_Interim ☐ SBP-RRR-CA-AB-FOR_v1.0 RRA for Alberta FOR_Interim ☐ SBP-RRR-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:	
4.2.6 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.	
Description of the specific risk:	
Community and stakeholder consultations on forestry plans and planning have been carried out at the national level. However, at the implementation level, community and stakeholder consultations on forest management plans and exploitation plans of forest owners have only been thoughtfully implemented by forest owners who are state organizations. Forest owners who are private organizations and small forest owners often do not fully consult with the community when implementing sustainable forest management plans and do not notify the exploitation plan and forest product inventory to the Forest Protection Department. Therefore, this indicator is considered a defined risk for forest owners who are private organizations and small forest owners.	
Mitigation measure:	
Controlled materials: - Consultation with stakeholders	
Monitoring and outcomes:	
- Consultation with stakeholders: + The policy of protecting and developing forests, linked with poverty alleviation and improving the lives of ethnic minorities, is a top priority and is always given attention by the Party, the State, and local authorities. + Regarding forestry planning, local authorities develop specific planning roadmaps suitable to local conditions based on the general planning of the Ministry of Agriculture and Rural Development and the General Department of Forestry. + During the roadmap development process, the authorities solicit public opinion through meetings. - In addition, local authorities encourage and allocate land to ethnic minority communities to participate in reforestation, aiming to improve their economic lives and raise awareness of forest protection. + The company purchases timber from several ethnic minority households: they confirm that planting and harvesting timber provides a stable source of income and helps improve their living standards. There are no disputes between Kinh (Vietnamese) and ethnic minority households involved in reforestation. - Monitoring: We implement the internal monitoring system to ensure the mitigation measures are implemented, use latest version of RRA for Viet Nam (if any updated). The material that comes from the FMUs that the specified risks are not mitigated will be excluded.	
Low risk	

4 Stakeholder engagement

4.1 General description

Biomass Producer's stakeholder engagement start date: 02 Apr 2026

Biomass Producer's stakeholder engagement end date: 03 Jun 2026

Total number of stakeholders contacted: 61

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

Type of stakeholders: NGOs (Environmental, social), Universities, Local/regional authorities, individuals. Methods of communication: email and in person

4.2 Response to stakeholder comments

Stakeholder description: Stakeholders

Stakeholder comment: - All forest planting households comply with current laws and regulations - All forest planting households have red books, land use right certificates, and exploitation applications confirmed by local authorities. There is no encroachment on natural forests or protective forests. There are no disputes between forest planting households - Labor rights are guaranteed, no violation of current Labor Law. There is a labor safety regime for workers exploiting forest plantation households. - The production forest planting area does not have cultural values that need to be preserved, there are no rare animals and plants - The process of planting and exploiting forests does not affect the lives and beliefs of local people and ethnic minorities - The exploitation process does not affect the ecosystem of the area, does not pollute the soil and water environment, does not cause landslides, soil erosion, and ensures forest fire prevention and fighting. Although the burning of vegetation still exists in some forest plantation households, forest owners only carry out local burning in small patches, ensuring that it does not harm the soil and water ecosystems.

Response to the stakeholder: The company used the inputs of stakeholders as mitigation measures for specified risk indicators.

5 Report updates and approval

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

Summary of changes: N/A

Name	NGUYEN BAO TUAN
Title	Management representative
Date of report approval	06 Jun 2026

Annex 1: Detailed findings for Supply Base Evaluation indicators

Annex 2: EU RED Supply Base Evaluation

Countries where EU RED Supply Base Evaluation is used	
Country	Viet Nam
Area	Dak Lak province and Gia Lai province
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	- The company only purchases acacia wood from households that have planted forests. The acacia trees have been identified as not being on the CITES and EUTR lists. - The company checks the land use rights certificates, logging applications, and timber product lists of the suppliers. All forest-planting households have land use rights certificates or logging applications certified by the local authorities. - Field inspections: Company purchasing staff conducted surprise inspections of several planted forest households before, during, and after harvesting. - The company did not detect any boundary disputes or illegal harvesting; the forest owners harvested within the boundaries specified in their land use right certificates (including felling, harvesting, and timber disposal). - Consultations with local authorities and relevant parties: + Department of Agriculture and Environment, Forest Protection Department of Dak Lak province + People's Committees of Dong Xuan and Xuan Lanh communes, Dak Lak province + Department of Agriculture and Environment, Forest Protection Department of Gia Lai province + People's Committees of Van Canh, Canh Vinh, Tuy Phuoc Tay, Hoa Hoi, Hoi Son, Xuan An, Phu My Nam, Phu My Tay, An Nhon Tay, An Hoa, Binh Duong, Binh Hiep, Binh Phu, Xuan An, De Gi, Phu My, Quy Nhon Tay, Tuy Phuoc Tay and Vinh Son communes, Gia Lai province - Local authorities and forest rangers regularly monitor and inspect the planting, harvesting, and transportation of timber at planted forest households. No violations of current laws and regulations have been recorded in the communes/districts. The material that comes from the FMUs that are not complying with EU RED will be excluded.

(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	SBP-RED-AS-VN-FOR_v1.1 REDIII Level A for Vietnam FOR
Level B management system at the level of the forest sourcing area	N/A
(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	SBP-RED-AS-VN-FOR_v1.1 REDIII Level A for Vietnam FOR
Level B management system at the level of the forest sourcing area	N/A
(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	- Consultations with stakeholders: -> No negative feedback was received from stakeholders regarding the negative impact of mineral exploitation activities on soil quality and biodiversity in these raw material areas. - Implement measures to maintain soil quality and biodiversity, in order to minimize negative impacts. + Rational land management: Applying farming techniques such as crop rotation and minimizing plowing helps protect soil structure and prevent erosion. + Using less toxic fertilizers and pesticides: Limiting the use of harmful chemicals, instead using biological and organic methods to protect crops without harming other species in the ecosystem. -> Households use phosphorus fertilizer, organic fertilizer, and NPK fertilizer for acacia and eucalyptus trees, and do not use chemicals or pesticides.

+ Selective harvesting: Harvesting only mature trees, avoiding excessive destruction of the natural ecosystem and creating conditions for the regeneration of trees and animals, without destroying important ecological forests.

-> The company only purchases acacia wood from forests that are 5 years old or older. After felling, these forests will be replanted by the forest owners for a new crop.

+ Post-harvest soil restoration and protection: After each harvest, apply measures such as organic fertilization, cover cropping, or soil regeneration techniques to protect soil structure, keep the soil healthy and nutrient-rich, sustain plant and animal life, and minimize soil erosion.

- After harvesting, waste is collected and transported to a waste treatment facility. Organic waste (branches, grass, plants, etc.) is chopped into small pieces and spread evenly on the ground.

+ Planned and sustainable exploitation: Avoid over-exploitation or exploitation in vulnerable areas.

-> Currently, planted forests are located far from natural and protected forests, in areas without rare flora and fauna or vulnerable habitats. Forests must be at least 5 years old before harvesting, and new seedlings will be planted after harvesting.

+ Biodiversity management: Ensuring the protection of flora and fauna in the harvesting area. This may include maintaining buffer zones, creating ecological corridors, or restoring affected ecological areas.

- A policy of integrated harvesting and environmental protection is implemented by local authorities for forest-planting households. This ensures that the harvesting process does not pollute the soil and water environment and protects the flora and fauna ecosystem in the planted forest area.

+ Local authorities require forest-planting households to maintain hygiene in the harvesting area, avoiding impact on the ecosystem of animals, plants, and microorganisms, and protecting the soil and water environment. Regularly educate and encourage households to avoid burning the topsoil, which causes landslides, erosion, environmental pollution, and easily leads to forest fires. Local authorities confirm that some households still collect and burn mining waste because the cost of hiring sanitation workers is quite high and time-consuming. However, very few households do this.

- On-site inspection: During the inspection of the forests, the assessment team found:

+ No landslides or soil erosion were detected.

+ The mining process always ensures environmental hygiene, does not affect the soil environment, and does not pollute water sources.

+ After mining, workers clean the area and collect waste. Mining waste is collected and transported to a processing site, and any remaining organic matter (leaves, small branches, etc.) is chopped and evenly distributed.

+ Tree stumps are cut close to the base, leaving the stump intact, avoiding digging/disturbing the roots.

	The material that comes from the FMUs that are not complying with EU RED will be excluded.
(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	SBP-RED-AS-VN-FOR_v1.1 REDIII Level A for Vietnam FOR
Level B management system at the level of the forest sourcing area	N/A
(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	SBP-RED-AS-VN-FOR_v1.1 REDIII Level A for Vietnam FOR
Level B management system at the level of the forest sourcing area	N/A
(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	SBP-RED-AS-VN-FOR_v1.1 REDIII Level A for Vietnam FOR
Level B management system at the level of the forest sourcing area	N/A

(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.

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:

*(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.*

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-RED-AS-VN-FOR_v1.1 REDIII Level A for Vietnam FOR
Level B management system at the level of the forest sourcing area	N/A

(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	SBP-RED-AS-VN-FOR_v1.1 REDIII Level A for Vietnam FOR
Level B management system at the level of the forest sourcing area	N/A

(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
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Level A risk assessment description	SBP-RED-AS-VN-FOR_v1.1 REDIII Level A for Vietnam FOR
Level B management system at the level of the forest sourcing area	N/A
(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	- Consultations with stakeholders - In Gia Lai province, the peatland area is highly limited, with a total estimated area of under 100 hectares, placing it among the provinces with low peat reserves. Distribution locations: - Former Gia Lai area: Peatland is distributed in intermontane depressions and accumulation valleys around the Pleiku and Chu Pah areas, but the reserves are insignificant, appearing mainly as shallow outcrops. - Former Binh Dinh area: There are several coastal waterlogged depressions or ancient marshes (such as in the Quy Nhon and Phu My areas) where small marshy peat streaks have been recorded, but most have been silted up or urbanized. - Dak Lak province possesses a transitional topography from the basaltic plateau to the coastal plain, creating a highly characteristic distribution of peatlands. It is estimated that the entire province has about 150 – 250 hectares of scattered peatlands. Distribution locations: - Highland area (former Dak Lak): Mainly concentrated in low-lying valleys between basaltic mountain ranges or ancient lake beds; typically in Cu M'gar district (Bau Dung area), Krong Bong district, and several river/stream accumulation basins belonging to the Srepok River system. - Lowland area (former Phu Yen): Virtually no large-scale peat mines exist; there are only small organic accumulations or outcrops in the form of marshes along the alluvial plains of the Ba River (Da Rang River), particularly in Xuan Son Nam, Xuan Long, and Xuan Phuoc communes (Dong Xuan district); the low-lying area along the lower reaches of the Ba River (near Hoa Hiep Bac and Hoa Hiep Trung wards of Dong Hoa town); and a few thin peat-like organic sediment streaks recorded on the fringes of the O Loan lagoon system (freshwater/brackish wetlands adjacent to the lagoon) in Tuy An district - There are no production forest models of acacia or eucalyptus distributed on the peatland areas of this province due to the following reasons: - Small and scattered distribution: The low-lying areas containing peat or organic mud in the province are very small in size and

	are distributed in plains, downstream river basins, or lagoons. Currently, these areas are fully utilized by local residents for other purposes, such as wet rice and food crop cultivation, aquaculture, and extraction for fertilizer production. - Contrasting ecological requirements: Acacia and eucalyptus forests are planted on mountainous areas, sloping lands, degraded grey soils, or Feralit soils developed on granite (high, well-drained terrains). These tree species do not grow well on peatlands. - Strict legal management: Peatlands in Vietnam are closely and strictly managed under the Law on Minerals, the Law on Environmental Protection, the Law on Forestry, and the Land Law. Therefore, there is no occurrence of acacia or eucalyptus forests being planted on peatland areas. - The company's raw material areas are concentrated in high mountainous regions, so no presence of this type of soil. - The material that comes from the FMUs that are not complying with EU RED will be excluded.
(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	SBP-RED-AS-VN-FOR_v1.1 REDIII Level A for Vietnam FOR
Level B management system at the level of the forest sourcing area	<i>Not applicable, requirement only applies to Level A</i>

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-RED-AS-VN-FOR_v1.1 REDIII Level A for Vietnam FOR
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

N/A

Feedstock inspection and classification upon receipt

N/A

Supplier audit for processing residues and post-consumer feedstock

N/A

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).

Not Applicable (RED II TOF not included)

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).