

# A Europcell Holding GmbH atende aos requisitos da norma FSC de madeira controlada?

[18.05.2022]

Nossa empresa irá auditar uma fornecedora da Europcell Holding GmbH, a Bracell SP Ltda, que tem suas operações presentes nos estados do Mato Grosso do Sul e São Paulo. Nosso intuito é verificar se a Bracell SP opera de acordo com o padrão FSC-STD-40-005 V3-1 – Requisitos para Fornecimento de Madeira Controlada FSC. Nós estamos entrando em contato com você para perguntar se de alguma forma a Bracell não atende aos requisitos dessa norma.

Madeira Controlada atende ao mínimo de requisitos e pode ser adicionada junto com madeira certificada FSC em produtos que usam o selo FSC misto. Madeira Controlada não deve ser:

- Madeira explorada ilegalmente;
- Madeira explorada em violação dos direitos tradicionais e humanos;
- Madeira oriunda de florestas nas quais altos valores de conservação estejam sendo ameaçados por atividades de manejo;
- Madeira oriunda de florestas sendo convertidas em plantações e uso não-florestal; e
- Madeira de florestas nas quais árvores geneticamente modificadas sejam plantadas.

Seus comentários podem ser enviados antes ou durante a auditoria que acontecerá no Junho 2022. Veja abaixo como entrar em contato conosco caso esteja interessado em dar sua opinião ou fazer uma queixa sobre as atividades da Bracell SP:

- Se reunindo com um funcionário da NEPCon.
- Ligando para Michael Kutschke (apenas em inglês) funcionária da empresa Preferred by Nature Canada no Estônia através do número +4917690948964 ou para Carlos Paixão (português e inglês), contratado da Preferred by Nature Canada, telefone (581) 574-3121
- Cartas para Michael Kutschke, NEPCon Germany, Mühlenstr. 8a, 14167 Berlin, Germany
- E-mail para [mkutschke@preferredbynature.org](mailto:mkutschke@preferredbynature.org)
- Em pessoa, durante a auditoria, entrando em contato com o auditor Carlos Paixão

Nós manteremos confidencialidade caso você deseje, é só nos informar quando entrar em contato conosco.

Mensagens serão respondidas dentro de 30 dias.

Estamos enviando em anexo, um documento escrito pela Europcell Holding GmbH que inclui:

- Avaliação dos riscos de fornecer madeira inaceitável
- Medidas implementadas para mitigar esses riscos

Se você deseja contestar qualquer aspecto desse processo de certificação florestal ou nossa decisão quanto se essa empresa atende ou não aos requisitos do padrão de Madeira Controlada, acesse nossa política de resolução de disputas através do site [www.preferredbynature.org](http://www.preferredbynature.org).

Obrigada pela sua colaboração.

A indicação de outros stakeholders que possam estar interessados em nos dar sua opinião será bem vinda.

Atenciosamente,

**Michael Kutschke**

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# Does Europcell Holding GmbH meet FSC's Controlled Wood standard?

[18.05.2022]

We are carrying out an audit of Europcell Holding GmbH supplier Bracell SP Ltda – Brazil in Mato Grosso do Sul (MS) and São Paulo (SP) Brazil to see if their operations comply with FSC's [Controlled Wood](#) standard (FSC-STD-40-005 V3-1). We are writing to you to ask if you know of any reason why their operations would not meet this standard.

Controlled Wood is wood that meets minimum requirements and that can therefore be mixed with FSC wood and used in products with an FSC Mix label. In particular, the wood must not be:

- harvested illegally.
- harvested in violation of traditional and civil rights.
- harvested from forests with a high conservation value that is threatened by management activities.
- harvested from forests being converted to plantations or non-forest use.
- from forests in which genetically modified trees are planted.

We will carry out our audit June 2022. Here is how you should comment, if you wish to do so:

- When? You should send comments to us before or during the audit.
- How? You can comment by .
  - Meeting with a NEPCon staff member in person.
  - Phone to Michael Kutschke (English) Preferred by Nature Germany, or Carlos Paixos (Portuguese), Preferred by Nature Canada staff contract auditor. Their phone numbers are +4917690948964 and (581) 574-3121
  - Writing to NEPCon Germany, Mühlenstr. 8a, 14167 Berlin, Germany
  - Email to [mkutschke@preferredbynature.org](mailto:mkutschke@preferredbynature.org)
  - In person during the audit by arranging to meet with Carlos Paixos, Preferred by Nature Contract Auditor
- If you want your comments to be confidential please notify us when you submit the comments.

If you provide comments, we will provide feedback to you within 30 days of the audit.

Europcell Holding GmbH has written a summary document that lists:

- the risks they have identified that they may source unacceptable wood
- the measures they implement to mitigate those risks.

We have attached this summary document to this letter.

If you wish to dispute any aspect of this forest certification process or the decision we reach as to whether this company meets the Controlled Wood standard, you can access our Dispute Resolution Policy at [www.preferredbynature.org](http://www.preferredbynature.org).

Thank you for any help you are able to provide.

If you have any recommendations for contacting other stakeholders that may have an interest in providing comments on this company and audit, we would also gladly receive these from you.

Yours sincerely,

**Michael Kutschke**

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# EUROPCELL GmbH DDS PUBLIC SUMMARY

## Bracell SP Ltda – Brazil

### General information about DDS

Person responsible for developing the DDS:

Marcos Planello – Neocert Certificações Florestais e Agrícolas Ltda

**DDS was not developed by your organization  
(consulting or other external)**



This DDS is executed by Neocert on behalf of Europcell GmbH, with the collaboration of Bracell.

Bracell has Forest Management and Chain of Custody PEFC certification, with controlled sources. The factory has 3 types of supply: from its own areas and forestry partnerships (PEFC certified forestry management), purchase of standing wood from non-certified suppliers (qualified through CoC PEFC's DDS) and purchase of wood from FSC certified suppliers (forestry management FSC certified). All non-FSC wood purchased by the company is harvested by its own team. The areas are scrutinized to verify legal requirements such as land ownership and environmental aspects. The surrounding communities are characterized by social experts who analyze potential social HCVs (HCVs 5 and 6).

Due to its certifications and internal policies, Bracell performs 4 different types of monitoring in its suppliers. These monitoring include most of the mandatory control measures of the Brazil FSC NRA (FSC-NRA-BR v1). Other specific measures exclusive to FSC controlled wood are carried out by Neocert, such as internal DDS audits and stakeholders consultation, among others.

### Channel for complaints about controlled wood

Contact of the person or position responsible for resolving complaints:

Europcell GmbH – Ms. Lisa Walberg - [l-walberg@europcell.eu](mailto:l-walberg@europcell.eu) or phone +49 6181 9866 18

Neocert – Mr. Marcos Planello – [consultapublica@neocert.com.br](mailto:consultapublica@neocert.com.br) or phone or whatsapp +55 19 3375-1060

Procedure for filing complaints:

Complaints in Brazil can be made to Neocert through email. Complaints outside Brazil can be made to Europcell GmbH.

When a complaint is received this procedure must be followed:

- a) Acknowledging receipt of complaints registering in a shared form;
- b) Informing stakeholders of the complaint procedure, and providing an initial response to complaints within a time period of two (2) weeks;
- c) Complaints related to risk designations in the Brazil NRA should be forwarded to FSC Brazil.
- d) A preliminary assessment must be done to determine evidence provided in a complaint is or is not substantial, by assessing the evidence provided against the risk of using material from unacceptable sources;
- e) Dialogue with complainants must be done aiming to solve complaints investigated as substantial before further actions are taken;

- f) Forwarding substantial complaints to the certification body and relevant FSC National Office for the supply area within two (2) weeks of receipt of the complaint. Information on the steps to be taken by the organization in order to resolve the complaint, as well as how the precautionary approach will be used, shall be included with the complaint;
- g) The precautionary approach towards the continued sourcing of the relevant material should be adopted while a complaint is pending; Substantial complaints must lead to the temporary suspension of supply if they are considered relevant and at the same time are not addressed.
- h) the field verification and/or desk verification will be done to verify a complaint verified as substantial by the organization, within two (2) months of its receipt;
- i) Determining the corrective action to be taken by suppliers and the means to enforce its implementation by the supplier if the complaint has been verified and verified as substantial. If corrective action cannot be determined and/or enforced, the relevant material and/or suppliers shall be excluded by the organization;
- j) Verifying whether corrective action has been taken by suppliers and whether it is effective;
- k) Excluding the relevant material and suppliers from the organization's supply chain if no corrective action is taken;
- ) Informing the complainant, the certification body, and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution, and for maintaining the copies of relevant correspondence;
- m) Recording and filing all complaints received and actions taken in the complaint form.

#### Recording of significant changes in the DDS

Date	Changes	Updates
Dec-2021	Version 1-0	Apr-2022

#### Description of the supplier area

State	Cities
Mato Grosso do Sul (MS)	Brasilândia, Campo Grande, Ribas de Rio Pardo e Três Lagoas.
São Paulo (SP)	Agudos, Álvaro de Carvalho, Angatuba, Anhembi, Arandu, Avaí, Bauru, Boa Esperança do Sul, Borebi, Botucatu, Buri, Cabrália Paulista, Caieiras, Cajamar, Echaporã, Iacanga, Iaras, Itaberá, Itaí, Itapetininga, Itapeva, Itatinga, Lençóis Paulista, Paranapanema, Paulistânia, Piraju, Piratininga, Platina, Pratânia, Presidente Alves, Reginópolis, Santa Cruz do Rio Pardo, São Manuel, Sarutaiá, Taquarituba, Tejupá e Torrinha.

Total of suppliers included in the DDS since December 2021:	110
Forests operation in April 2022:	20 farms
Operation modules:	10
Approximate or exact number of indirect suppliers:	0
I have forestry suppliers (logs, chips chopped in the forest)	<input checked="" type="checkbox"/>

I have industrial or commercial suppliers (processed wood, industrial waste)	<input type="checkbox"/>
Average size of the supply chain (number of tiers until reaching the forest)	1 tier

## RISK ANALYSIS AND MITIGATION

### Risk analysis used

FSC-NRA-BRA-V1-0

### Origin risks

This categories has specified risks: 1.1, 1.6, 1.9, 1.10, 1.11, 1.12, 1.13, 1.14, 1.15; 2.2, 2.3; 3.1, 3.2, 3.3, 3.4, 3.5, 3.6.

All the other categories were indicated as low risk or not applicable.

### Supply chain risks

Identified mixture risks:

Potential mixing risks are the use of log yards; risk of the truck driver completing the load on an unapproved farm; risk of an unapproved farm sending wood to the factory; risk of mixing of pulp during transportation of pulp to the port in Brazil; risk of mixing of pulp in the trader's warehouses.

Control measures implemented to prevent mixing:

To mitigate the risks of mixing the logs with ineligible inputs, Bracell (pulp supplier) only acquires wood from registered forests after the implementation of the DDS or forests with FSC certification. A wood input control system was established at the mill that is linked to the organization's system. In this system, it's possible to check the active forests for wood delivery and the volume delivered by each farm, with the invoices referring to each load delivered. Suppliers that do not exist or are inactive in the system are blocked and cannot enter the mill. They are therefore prevented from unloading material into the log yards. Employees working at the scales are trained to identify and reject any load that does not comply with the information registered in the system. Once it is guaranteed that all pulp was produced from controlled sources and FSC certified, it is possible to assure that all pulp sold by Bracell factory to Bracell trader is also eligible for certification. Bracell trader mitigates the risk of pulp mixing in the warehouses buying pulp only from Bracell. In case of suspicion of ineligibility of any batch of pulp, traceability to the forestry link can be done.

### Risks in forest origin

#### 1.1 Land Use and Property Rights

Mandatory control measures:

- Check documentation that guarantees land ownership / possession and use, as for example the following verifiers, but not limited to these:
- The management contract or other agreements with the owner must clearly indicate the management rights (Temporary Occupation Authorization granted by INCRA);
- Rural Environmental Registry - CAR

- Rural Territorial Property Tax - ITR
- Certificate of Rural Property Registration - CCIR
- Certificate of Full Enrollment Rural Property Content
- Negative Certificate of Debit of Rural Property - CNDIR
- Operating License/Operating Permit.

Recommended control measures:

- Consult reports relevant to the subject, such as the Pastoral Commission of Land (CPT) and others, to verify if CW suppliers are not involved in land disputes;
- Consult with affected and/or interested stakeholders to verify the inexistence of conflicts;

Additional explanations on the measures taken:

During the registration of supply areas, the company obtains the registration of the property. If this is not in the name of the wood supplier, the contract between the owner and the supplier is requested. These registrations are available at the company's legal department and were reviewed by the Neocert team. All are in compliance.

### 1.6 Value Tax and Other Sales Tax

Mandatory control measures:

- Verify the existence of sales documents showing the products and volumes, can be used for example invoices, sales contracts, among others.
- Request debt clearance certificate (CND) from suppliers, at federal, state and/or municipal levels.

Additional explanations on the measures taken:

All wood entries are accompanied by a CTM transport guide (timber transport certificate) approved by the special regime of the São Paulo Department of Finance. Wood from the state of MS are transported with a "Nota Fiscal" (an invoice in the national market). The issuance of CNDs for each supplier was issued by the Neocert team.

### 1.9 Protected sites and species

Mandatory control measures:

- Confront controlled wood supply areas in relation to conservation units and / or buffer zones to verify possible overlaps. To check overlap, maps be can used, for example;
- In cases where overlap occurs with conservation units and/or buffer zone, evidence of compliance with the management plan of the Conservation Unit - CU (if there's any) must be collected;
- In cases where the overlap occurs with conservation units and/or buffer zone and there is no management plan for the CU, the consent of the environmental agency/manager of the CU must be sought, when applicable;
- In cases of overlap of archeological heritage identified with management units, the good management practices shall be confirmed to avoid damage to those values. Examples of good management practices are, but not limited to:
  - Soil and water conservation measures, avoiding erosion and damages to those values;
  - Tree felling direction control, avoiding damages to those values;
  - Planning of the harvesting and transportation aiming to avoid damages to those values;

- Avoid planting near archeological sites, whenever possible.

Additional explanations on the measures taken:

Bracell's geoprocessing area was used to analyse the overlap of farms with Conservation Units (CU) and their Protective Buffer Zones using a 2 km buffer, and after the implementation of DDS by Neocert, the buffer for analysis of overlaps changed to 10 km from the supply areas with the inclusion of new shapes to consider the overlap. All supply areas have a shapefile to facilitate this analysis. In cases of overlap, the CU Management Plans are analyzed. If there is no Management Plan and still there is an overlap with the CU or the Protective Buffer Zone, the permit of the CU's management body is requested.

### 1.10 Environmental requirements

Mandatory control measures:

Field verifications to check the conformity of operations with the applicable environmental legislation, paying attention to at least the following situations, but not limited to them:

- Harvest of exotic species in APP and, when applicable, taking into account the conditions of the authorization;
  - Soil / road conservation;
  - Damage to remaining native vegetation;
  - Damage to water resources;
  - Compliance with the requirements of the Environmental Impact Study (EIA) related to Controlled Wood, when applicable;
  - Proper collection of waste (such as oils, packaging, contaminated material, etc.) generated in harvesting and transportation activities.
- ☑ Consult the IBAMA website and/or the state environmental organizations to verify the existence of embargoed areas related to the supply of Controlled Wood;

Additional explanations on the measures taken:

Bracell's field checks analyze damage to soil, remaining vegetation, water resources and waste collection from the operation. Annually, Neocert performs an internal audit of the DDS to check these records in the field. Bracell has a policy of not purchasing wood from permanent preservation areas. Advanced plantations over APP are left behind, not harvested.

### 1.11 Health and safety

Mandatory control measures:

Field verifications to check conformity of operations with occupational health and safety legislation, considering at least, but no limited to:

- Appropriate use of individual safety equipment;
  - Confirmation that all legally required protection equipment is provided by the organization with no cost for the forestry worker.
  - Access to water and food in satisfactory quantity and quality;
  - Confirmation that working conditions related to harvest and transportation activities are safe in the management unit for all employees;
  - Appropriate transportation conditions;
  - Adequate sanitary facilities;
  - Adequate housing conditions;
  - Training to carry out the activity;
  - ASO - Attestation of Occupational Health;
  - License to Carry and Use (LPU) of the chainsaw
- ☑

Additional explanations on the measures taken:

All labor used in the harvest is Bracell's own. The transport of wood is carried out by third-party companies, over which Bracell specifically monitors OHS and legal employment. Monitoring checks the use of PPE, safety training and the safety conditions of machinery and equipment, as well as harvesting and transport signals. In general, the harvest is entirely mechanized, with chainsaws being used only in very specific situations, in any case the operators are trained and the chainsaws registered. There are no accommodations in the harvesting and transport operations. The transport and feeding of workers, as well as the restrooms and living areas are also monitored by Bracell and audited by Neocert, in addition to being PEFC certified, which audits the same requirements.

### 1.12 legal employment

Mandatory control measures:

<input checked="" type="checkbox"/>	<p>Field verifications to check conformity of workers' documentation and guarantees of all labor rights, confirming that:</p> <ul style="list-style-type: none"><li>• All workers are employed according to the regulations and all required contracts/evidence are in place (e.g. payment of fees, working hours, among others);</li><li>• At least the minimum salary or salary compatible with the category, where applicable, is being paid to employees involved in harvesting and transportation activities;</li><li>• The minimum age is observed for all personnel involved in harvesting, transportation or hazardous activities.</li><li>• Labor practices similar to slave labor or labor analogous to slavery are not involved in harvesting or transportation activities.</li></ul> <p>Note: In case of forest management in areas of traditional populations or family farming, the verification of the guarantees of workers' rights must respect the cultural values and their production methods</p>
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Additional explanations on the measures taken:

All harvesting labor is owned by Bracell. The workers involved in the transport of timber are registered employees of subcontractors. On these, Bracell exercises constant HR monitoring. There are monitoring by Bracell that assess whether workers are registered, benefits and working hours. Issues such as slave and child labor are not part of the company's reality.

### 1.13 Customary rights

Mandatory control measures:

<input checked="" type="checkbox"/>	<p>Overlap information to check the existence of traditional communities surrounding the supplying units, such as through maps and other information, using data from official sources such as FUNAI, Palmares Cultural Foundation, Culture Office, IPHAN, local association, among others;</p>
<input checked="" type="checkbox"/>	<p>Survey of information that indicates the existence or not of conflict, for example:</p> <ul style="list-style-type: none"><li>• Media;</li><li>• Consultation with stakeholders (NGOs, city halls, unions, public bodies, associations and others)</li></ul>
<input checked="" type="checkbox"/>	<p>In the case of evidence of conflict, field checks with the affected communities shall be carried out</p>

Additional explanations on the measures taken:



The company's geoprocessing area overlaps shapes with indigenous lands and quilombola communities (traditional communities), in addition to non-traditional communities. When there is proximity, the social team performs the characterization with the community. The survey of information in the media is carried out by Neocert. The institutions FUNAI, INCRA, IPHAN, and Palmares Foundation are considered essential stakeholders in the consultation processes and, therefore, are consulted annually. Even if there is no overlap with communities.

#### 1.14 Free, Prior and Informed Consent

Mandatory control measures:

- |                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | Using data from public bodies (FUNAI, INCRA, Palmares Cultural Foundation) check if the supply unit is inserted in indigenous or traditional lands legally demarcated.   |
| <input checked="" type="checkbox"/> | In case the supply unit is inserted in indigenous or traditional lands legally demarcated, check with the responsible bodies (IBAMA, INCRA) to guarantee that the management is being carried out in compliance with legal requirements, including environmental licensing and legal management and tenure rights. |
| <input checked="" type="checkbox"/> | In case the supply unit is inserted in indigenous or traditional lands legally demarcated and it is in compliance with the law, consult the traditional or indigenous people and the responsible bodies (FUNAI, INCRA, Palmares Cultural Foundation) to guarantee that the FPIC is in place.                       |

Additional explanations on the measures taken:

The overlapping of supply area shapes with traditional communities and indigenous lands demonstrates that there is no overlap, making FPIC inapplicable.

#### 1.15 Right of indigenous peoples

Mandatory control measures:

- |                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Carry out the cross-checking of information to verify the existence of indigenous peoples and quilombolas in a range of up to 10 km from the supply units; as for example through maps with data coming from official bodies like FUNAI, Palmares Cultural Foundation or others.;   |
| <input checked="" type="checkbox"/> | If there are indigenous and/or quilombola people identified within a range of up to 10 km from the supply units, consultation with stakeholders (FUNAI, Palmares Cultural Foundation and/or INCRA) must take place to attest the regularity of the activities of the enterprise in relation to the rights of possession and use and other rights related to indigenous and traditional populations; |

Additional explanations on the measures taken:

The overlap or proximity analysis indicated that there is an indigenous land close to one of the supply areas, the "Melhoramentos" farm, which is FSC certified. In the consultation with stakeholders carried out by Neocert the institutions, FUNAI and Palmares Foundation were considered.

#### 2.2 Labor rights are respected, including rights specified in the ILO's Fundamental Principles and Rights at Work.

Mandatory control measures:

- |                                     |   |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | <p>Carry out field surveys to evidence that:</p> <ul style="list-style-type: none"> <li>• timber is produced under policies that respect freedom of association and right to collective bargaining and absence of discrimination;</li> <li>• there is no labor analogous to slavery or child labor.</li> <li>• there is no discrimination in employment, occupation, gender and / or race.</li> </ul> |
|-------------------------------------|---|

Additional explanations on the measures taken:

All labor used in the harvest is own and PEFC certified. Transport is also under the scope of certification, despite being outsourced. Bracell and Neocert monitors interview workers about freedom of association, right to collective bargaining and absence of discrimination.

### 2.3 The rights of indigenous and traditional peoples are upheld.

Mandatory control measures:

<input checked="" type="checkbox"/>	Confront areas of supply of controlled wood with areas of indigenous populations and/or traditional populations in order to verify possible overlap or proximity in a range of up to 10 km. In order to verify such overlap, one can use, for example, information available in: <ul style="list-style-type: none"><li>• FUNAI;</li><li>• INCRA.</li></ul>
<input checked="" type="checkbox"/>	In cases where there is overlap or proximity within a range of up to 10 km from the controlled wood supply area, interested parties must be consulted to see if there are any conflicts with indigenous populations and/or traditional populations and to attest that the situation is in accordance with the responsible bodies requirements;
<input checked="" type="checkbox"/>	Consult reports related to the rights of indigenous and traditional population (such as land possession rights, rights to access to resources), such as the Pastoral Land Commission and others, to verify that the areas of supply of controlled wood are not in a situation of land disputes;
<input checked="" type="checkbox"/>	Field verification of evidences that attest the management is not being conducted inside indigenous or traditional lands;

Additional explanations on the measures taken:

The Bracell team analyzes the overlap or proximity of supply areas with traditional and indigenous communities. The institutions FUNAI, INCRA, IPHAN, and Palmares Foundation are considered essential stakeholders in the consultation processes and, therefore, are consulted annually. Even if there is no overlap with communities. Consultation in the media and in the CPT report are carried out by Neocert.

### 3.1|3.2|3.3 (HCVS 1, 2 and 3)

Mandatory control measures:

<input checked="" type="checkbox"/>	Confront the controlled wood supply areas regarding the location of Priority Areas for Conservation and Conservation Units (except Environmental Protection Areas) in order to verify possible overlaps. You can use, for example, information available at: <ul style="list-style-type: none"><li>• ICMBio;</li><li>• MMA: UCs (<a href="http://mapas.mma.gov.br/i3geo/datadownload.htm">http://mapas.mma.gov.br/i3geo/datadownload.htm</a>)</li><li>• MMA: Priority Areas for Conservation (<a href="http://areasprioritarias.mma.gov.br/2-updatecao-das-areas-prioritarias">http://areasprioritarias.mma.gov.br/2-updatecao-das-areas-prioritarias</a>)</li><li>• RAMSAR (<a href="https://www.ramsar.org/wetland/brazil">https://www.ramsar.org/wetland/brazil</a>)</li></ul>
<input checked="" type="checkbox"/>	When there is an overlap of the supply area with Priority Areas for Conservation and/or Conservation Units, except for Environmental Protection Areas, good management practices must be evidenced.

Recommended control measures:

- Conduct field visits to verify that good management practices are in place.

Additional explanations on the measures taken:

Mappings were carried out with all layers indicated by the ANR. There are overlaps with priority areas for conservation on company properties. Good management practices are the company's operating procedure. There are internal assessments on post-harvest environmental aspects. During the internal DDS audit, Neocert audits supply areas.

### 3.4 HCV 4

Mandatory control measures:

<input checked="" type="checkbox"/>	<p>Confront the areas of controlled wood in relation to the location of Conservation Units (except APA – “Área de Proteção Ambiental”), areas of local communities, indigenous and/or traditional populations in order to verify possible overlaps or proximity in a range of up to 10 km. For this to overlap check, the following sources can be used:</p> <ul style="list-style-type: none"> <li>• ICMBio;</li> <li>• MMA: UCs;</li> <li>• MMA: Priority Areas for Conservation;</li> <li>• FUNAI</li> <li>• INCRA</li> </ul>
<input checked="" type="checkbox"/>	<p>In cases where there is an overlap or proximity within a range of up to 10 km of the controlled wood supply area with the Conservation Units (except Environmental Protection Areas), the areas of local communities, indigenous and/or traditional populations, the parties Those affected should be consulted to identify that management does not negatively impact critical ecosystem services, for example, but not limited to: flood control, climate regulation, water resource maintenance and soil conservation.</p>
<input checked="" type="checkbox"/>	<p>In cases where there is an overlap or proximity in a range of up to 10 km from the controlled wood supply area with the Conservation Units (except Environmental Protection Areas), the areas of local communities, indigenous and/or traditional populations, carry out visits to verify if good management practices can be evidenced.</p>

Additional explanations on the measures taken:

There is proximity to supply areas with conservation units, indigenous lands and local communities. In these cases, the UCs and communities and their management bodies (if any) are included in the stakeholder consultation carried out by Neocert. In the field, good management practices are checked. The institutions FUNAI, INCRA, IPHAN, and Palmares Foundation are considered essential stakeholders in the consultation processes and, therefore, are consulted annually. Even if there is no overlap with communities.

### 3.5 HCV 5

Mandatory control measures:

<input checked="" type="checkbox"/>	<p>Confront the controlled wood supply area with areas of local communities, indigenous and/or traditional populations in order to verify possible overlap or proximity within a range of up to 10 km. For this to overlap check, the following sources can be used:</p> <ul style="list-style-type: none"> <li>• IBGE</li> <li>• FUNAI</li> <li>• INCRA</li> </ul>
<input checked="" type="checkbox"/>	<p>In cases where there is overlap or proximity within a range of up to 10 km from the controlled wood supply area the affected parties shall be consulted to verify that management does not adversely impact areas and resources that are critical to meeting the basic needs of local communities, indigenous populations or traditional populations.</p>
<input checked="" type="checkbox"/>	<p>If the consultation with affected parties identifies that management may be negatively impacting areas and resources essential to meet the basic needs of local communities,</p>

indigenous populations or traditional populations, perform field surveys to ensure that the management adopted does not generate such impacts.

Additional explanations on the measures taken:

The geoprocessing analysis verifies the proximity of supply areas with indigenous, traditional and local communities. Nearby communities are characterized by Bracell's social team and included in Neocert's stakeholder consultation. The institutions FUNAI, INCRA, IPHAN, and Palmares Foundation are considered essential stakeholders in the consultation processes and, therefore, are consulted annually. Even if there is no overlap with communities.

**3.6 HCV 6**

Mandatory control measures:

- Confront the controlled wood supply area with areas of local communities, indigenous populations, traditional populations, archeological sites and/or world heritage sites in order to verify possible overlap or proximity within a range of up to 10 km. For this overlap check, the following sources can be used:

  - IBGE
  - FUNAI
  - INCRA
  - IPHAN
  - UNESCO
- In cases where there is overlap or proximity within a range of up to 10 km from the controlled wood supply area the affected parties shall be consulted to identify whether management does not negatively impact the critical cultural values of local communities, indigenous populations or traditional populations.
- If the consultation with affected parties identifies that management may be negatively impacting the critical cultural values of local communities, indigenous populations and / or traditional populations, perform field surveys to ensure that the management adopted does not generate such impacts.

Additional explanations on the measures taken:

The geoprocessing analysis verifies the proximity of the supply areas with archaeological sites, world heritage and indigenous, traditional and local communities. Nearby communities are characterized by Bracell's social team. If there is proximity, managers or communities are included in Neocert's stakeholder consultation. The institutions FUNAI, INCRA, IPHAN, and Fundação Palmares are considered essential stakeholders in the consultation processes and, therefore, are consulted annually. Even if there is no overlap with communities.

**If the company has replaced the ANR control measures with its own control measures, indicate the responsible experts**

- Not applicable, the company did not replace the ANR control measures

Expert name	Qualification	scope of work	License number (if applicable)
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If a public source was used instead of an expert, please indicate the source:

## Summary of the organization's stakeholder consultation process

Areas for which the consultation was carried out:

The stakeholder consultation considered all groups determined in FSC-STD-40-005 V3-1. The consultations were carried out at national and regional levels, covering all 84 farms mentioned at the beginning of this document. The feedback received by the consultation to date has been recorded, responded to and forwarded, as provided by internal procedures and in compliance with the standard deadlines.

### Invited Interest Groups

- economic interests
- social interests
- environmental interests
- FSC accredited certifiers in the country
- National and state forest agencies
- Experts with experience in controlled wood categories
- Universities and research institutions
- FSC regional offices, FSC network partners, registered standard development groups and ANR working groups in the region

Summary of comments received (do not associate the name of the interested party)

The first responses received indicate that Bracell carries out its operations without objections from society. No response could be interpreted as a complaint.

Description of how the project took into account the comments received

The comments received were analyzed and if there were any signs of problems related to the DDS, in-depth analyzes were carried out on the topic and/or individual interviews with interested parties

Completion of the project on the possibility of considering the raw material as controlled wood, based on the consultation

The consultation has yet to reveal any points of attention to be considered a driver for field checks. Therefore, based on the consultation with stakeholders, there is no impediment for this wood to be considered controlled wood by Europcell GmbH.

## field verification

Summary of the organization's conclusions derived from the field verification.

The field checks showed that the records of monitoring carried out by Bracell are consistent with reality and that monitoring is sufficient and carried out by a qualified team, in order to ensure environmental, legal and labor aspects.

Measures taken to correct non-compliances

Specific opportunities for improvement were presented and accepted by the company.

If any relevant information has not been made available in the fields above because it is confidential, justify the confidentiality of the information

Details of supplier name and location, as well as details of improvement opportunities, are only available to Europcell GmbH's FSC certifier.