

Does Harihar Polyfibers & Grasilene Division (Unit of Grasm Industries Limited meet FSC's Controlled Wood standard?

Dated: 28th March 2024

We are carrying out an audit of Harihar Polyfibers & Grasilene Division (Unit of Grasm Industries Limited located in Karnataka 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 reassessment audit between 9th to 11th May 2024. 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 Preferred by Nature staff member in person.
 - Phone to Mr. Marimuthuram (+91-9319434222), or Mr. Praveen Kumar Singh (+91-9319405666), or Mr. Aadarsh Mohandas (+91-9319430111)
 - Writing to Mr. Marimuthuram at NEPCON India Pvt Ltd, 1098 2nd Floor, Near Poorna Pragna School, New Tippasandra, Bengaluru, Karnataka, India 560075.
 - Email to Marimuthuram at marimuthu@preferredbynature.org
 - In person by arranging to meet with Mr. Marimuthuram (+91-9319434222), or Mr. Praveen Kumar Singh (+91-9319405666), or Mr. Aadarsh Mohandas (+91-9319430111)
- 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.

Harihar Polyfibers & Grasilene Division (Unit of Grasm Industries Limited 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 <https://preferredbynature.org/dispute-resolution-policy>

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,

Marimuthuram.M (Forestry Coordinator), Preferred By Nature, India.

Preferred by Nature™

FSC Controlled Wood Due Diligence System Public Summary

1. General information

Organisation name:	Harihar Polyfibers & Grasilene Division (Unit of Grasim Industries Ltd)
FSC certificate code:	NC-COC/CW-053796
Organisation's DDS contact person:	Maruti Patil
DDS prepared/assisted by:	Sudhanshu Shekhar / HD Kulkarni (Expert)
Date last reviewed/updated (by the organisation):	14/03/2024

2. Suppliers

Participating site	Non-certified material type sourced	Exact number of suppliers	Supplier type(s)	Average no. of tiers in the supply chains	Approximate or exact number of sub-suppliers
Harihar Polyfibers & Grasilene Division (Unit of Grasim Industries Ltd)	Wood logs	9	Private Suppliers	Farmers – Private Suppliers – Company Wood Yard (2 Tiers)	NA
		2	Govt Suppliers	Forest Managers – Company Wood Yard (1 Tier)	NA

3. Supply areas

Supply area	Controlled wood category	Reference to risk assessment used	Risk designation
Private Suppliers supplying to the organization from individual framers (Karnataka State)	1	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk(1.1,1.6,1.9,1.12,1.13,1.15,1.16,1.17,1.19,1.20)
	2	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk (2.2,2.3)
	3	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk (3.1,3.2,3.3,3.4,3.5,3.6)
	4	FSC-CNRA-IN V1-0 EN-15-12-2017	Low risk
	5	FSC-CNRA-IN V1-0 EN-15-12-2017	Low risk
Govt Suppliers supplying to the organization from forest development corporations (Karnataka State)	1	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk (1.1,1.6,1.9,1.12,1.13,1.14,1.15,1.16,1.17,1.19,1.20)
	2	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk(2.2,2.3)
	3	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk(3.1,3.2,3.3,3.4,3.5,3.6)
	4	FSC-CNRA-IN V1-0 EN-15-12-2017	Low risk
	5	FSC-CNRA-IN V1-0 EN-15-12-2017	Low risk
Private Suppliers supplying to the organization from individual framers (Andhra Pradesh State)	1	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk(1.1,1.5,1.6,1.9,1.12,1.13,1.15,1.16,1.17,1.19,1.20)
	2	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk (2.2,2.3)
	3	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk (3.1,3.2,3.3,3.4,3.5,3.6)
	4	FSC-CNRA-IN V1-0 EN-15-12-2017	Low risk
	5	FSC-CNRA-IN V1-0 EN-15-12-2017	Low risk
Govt Suppliers supplying to the organization from public forest development corporations (Andhra Pradesh State)	1	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk(1.1,1.5,1.6,1.9,1.12,1.13,1.14,1.15,1.16,1.17,1.19,1.20)
	2	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk (2.2,2.3)
	3	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk (3.1,3.2,3.3,3.4,3.5,3.6)
	4	FSC-CNRA-IN V1-0 EN-15-12-2017	Low risk
	5	FSC-CNRA-IN V1-0 EN-15-12-2017	Low risk
Private Suppliers supplying to the organization from individual framers (Telangana State)	1	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk(1.1,1.5,1.6,1.9,1.12,1.13,1.15,1.16,1.17,1.19,1.20)
	2	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk (2.2,2.3)
	3	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk (3.1,3.2,3.3,3.4,3.5,3.6)
	4	FSC-CNRA-IN V1-0 EN-15-12-2017	Low risk
	5	FSC-CNRA-IN V1-0 EN-15-12-2017	Low risk
Govt Suppliers supplying to the organization from public forest development corporations (Telangana State)	1	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk (1.1,1.5,1.6,1.9,1.12,1.13,1.14,1.15,1.16,1.17,1.19,1.20)
	2	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk (2.2,2.3)
	3	FSC-CNRA-IN V1-0 EN-15-12-2017	Specified risk (3.1,3.2,3.3,3.4,3.5,3.6)
	4	FSC-CNRA-IN V1-0 EN-15-12-2017	Low risk
	5	FSC-CNRA-IN V1-0 EN-15-12-2017	Low risk

4. Risk assessment and mitigation

4.a Risk mitigation for the origin of the material

Supply area: Bangalore Urban, Bangalore Rural, Tumkur, Kolar, Mandya, Mysore, Hassan, Chitradurga, Davangere, Haveri, Dharwad, Belgaum, Karwar, Shimoga, Gadag, Bellary, Koppal, Raichur, Chikkaballapur, Ramanagar Districts of Karnataka

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
1.1	<p>1.1 Land tenure and Management Rights Risk Designation: Specified Risk</p> <p>Control Measure Private source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. In all the districts of Karnataka Land tenure and management rights are well defined. Further, Grasim Harihar Field staff visit harvesting plots and checks the Records of Rights (RoR) of at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis. DH / SH – Wood Procurement cross checks 1% of the records checked by field staff. Visited plots details are maintained in registers at Field Locations and monitored from HQ at Kumarpatnam. Land Records are checked through “Dishank” Mobile App of Govt. of Karnataka. If case of any difference, Farmers are requested to produce physical document or the relationship proof with the owner of the land. Government Source - Grasim Harihar procures Eucalyptus & Acacia wood from Government agency through participating in tenders floated by various Government departments time to time. Government organizations raises plantation on the own land allocated specifically for raising the Plantations, which are well documented, hence the material sourced from these sources are legal. Government Agencies provides the details of plots (District / Taluka / Village / Forest Range etc) along with the Wood Consignments.</p> <p>Desired Outcome: With the above control measure, it is confirmed that the farmer is the legal owner of land and hence this risk gets mitigated and becomes Low risk.</p>	<p>Field Staffs visited 1,480 plots, verified land records with “Dishank” Mobile app. In case of mismatch physical land documents were checked. Farmers were found to be rightful owner of the land.</p> <p>Based on above findings Risk is Low.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
1.6	<p>1.6 Value added taxes and other sales taxes Risk Designation: Specified Risk</p> <p>Control Measure Private source - Grasim Harihar, accounts department, ensures that all the applicable taxes such as GST are paid to the suppliers without fail. Each month, through GSTR 2A, it is being ensured that the applicable GST is paid by the supplier to the Government. The applicable taxes such as GST are being paid to the suppliers after the receipt of their invoice. Government Source - Grasim Harihar, accounts department, ensures that all the applicable taxes such as GST are paid to the Government suppliers without fail. Each month, through GSTR 2A, it is being ensured that the applicable GST is paid by the supplier to the Government. The applicable taxes such as GST are being paid to the suppliers after the receipt of their invoice.</p> <p>Desired Outcome: With the above control measure it is ensured that the supplier pays the applicable taxes and this risk gets mitigated and becomes Low risk.</p>	Not applicable as Field Verification not undertaken as control measure.
1.7	<p>1.7 Income and profit taxes Risk Designation: Specified Risk</p> <p>Control Measure Private source - Grasim Harihar, accounts department ensures that applicable taxes, Income and Profit taxes etc are being paid by the suppliers by deducting applicable TDS on invoice amount. Government Supply - Grasim Harihar, accounts department ensures that applicable taxes, Income and Profit taxes etc are being paid by the Government suppliers by deducting applicable TDS on invoice amount.</p> <p>Desired Outcome: With the above control measure – by deducting the TDS on invoices, the payment of income and profit taxes are being ensured and hence this risk gets mitigated and becomes Low risk.</p>	Not applicable as Field Verification not undertaken as control measure.
1.9	<p>1.9 Protected sites and species Risk Designation: Specified Risk</p>	

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Control Measure</p> <p>Private Source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. In all the districts of Karnataka Land tenure and management rights are well defined. Further, Grasim Harihar Field staff visits harvesting plots to check if site is protected site of at least one farmer from around 5% of the Wood Trucks that are supplied on daily basis Grasim Harihar. DH / SH – Wood Procurement cross checks 1% of the records checked by field staff. Visited plots details are maintained in registers at Field Locations and monitored from HQ at Kumarpatnam.</p> <p>Government Source - Grasim Harihar procures Eucalyptus & Acacia wood from Government agency through participating in tenders floated by various Government departments time to time. Government organizations raises plantation on the own land allocated specifically for raising the Plantations, which are well documented, hence the material sourced from these sources are legal. Government Agencies provides the details of plots (District / Taluka / Village / Forest Range etc) along with the Wood Consignments. Agencies like Forest Department and Forest Development Corporations are bound by Indian Forest Act 1927, Wildlife Protection Act, 1972 & Forest Conservation Act, 1980. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations.</p> <p>Desired Outcome: With the above control measure – visiting of sites on sample basis and checking the land ownership it is ensured that the farmer is legal owner of the land and the site is not protected site, also since the species procured is only Eucalyptus & Acacia this risk gets mitigated & becomes low risk.</p>	<p>Field Staffs visited 1,480 plots, verified land records with “Dishank” Mobile app. In case of mismatch physical land documents were checked. Farmers were found to be rightful owner of the land. It was found that it is Farmers land not protected sites. Species being harvested was Eucalyptus & Acacia.</p> <p>Based on above findings Risk is Low.</p>
1.12	<p>1.12 Legal employment</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source - Grasim Harihar ensures Legal Employment through Contract agreement with all the suppliers of wood, failure of which might result in termination of contract, which mentions about non employment of Child Labour etc. Further, Field Verification confirms that Legal Employment are observed during harvesting activities. The payment paid to the Workers is cross checked & maintained in Controlled Wood Risk Assessment Check list.</p>	<p>Field Staffs visited 1,480 plots, and interviewed Labours. Aadhar Card and Payment paid details to labour were checked and found ok. No Child labour was found. Payment is being made</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Government Source - Grasim Harihar ensures Legal Employment through legal agreement with all the government agencies who supply wood, failure of which might result in termination of contract, which mentions about non employment of Child Labour etc. Further, Field Verification confirms that Legal Employment is observed during harvesting activities. The payment paid to the Workers is cross checked & maintained in Controlled Wood Risk Assessment Check list.</p> <p>Desired Outcome: With the above control measure – implementation of legal contract and further field visit on sampling basis and interviewing workers about their age, payment details, basic amenities etc this risk gets mitigated & becomes low risk.</p>	<p>on tonnage basis which work out to be more than Minimum wage rate prescribed by Govt of Karnataka</p> <p>Based on above findings Risk is Low.</p>
1.13	<p>1.13 Customary rights Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. In all the districts of Karnataka Land tenure and management rights are will defined. Further, Grasim Harihar Field staff visits harvesting plots to check that customary rights of community is not denied. Staff records his observation in "Controlled Wood Risk Assessment Check list" document for at least one farmer from around 5% of the Wood Trucks that are supplied on daily basis. DH / SH – Wood Procurement cross checks 1% of the records checked by field staff. Visited plots details will be maintained in registers at Field Locations and monitored from HQ at Kumarpatnam.</p> <p>Stakeholder Consultation and Field Verification will confirm that customary rights are not being denied.</p> <p>Government Sources - The Government Agencies grow Eucalyptus & Acacia Plantation on the lands allocated to them for the same purpose. Stakeholder Consultation and Field Verification will confirm that customary rights are not being denied. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations. Expert Opinion will be taken once in a year.</p>	<p>Field Staffs visited 1,480 plots.</p> <p>It was observed that Places of Cultural and Religious importance were not disturbed due to harvesting activity.</p> <p>Based on above findings Risk is Low.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Desired Outcome: With the above control measure – visiting of sites on sample basis and checking the land ownership it is ensured that the farmer is legal owner of the land and the interview of community staying nearby it was found that their customary rights are not being denied - this risk gets mitigated & becomes low risk.</p>	
1.14	<p>1.14 Free prior and informed consent Risk Designation: Low Risk for Private Plantations, Specified Risk for Government Plantations</p> <p>Control Measure Private Source: Low Risk Government Source - The Government Agencies grow Eucalyptus & Acacia Plantation on the lands allocated to them for the same purpose. Stakeholder Consultation and Field Verification will confirm that Free prior and informed consent was availed. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations. Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure - visiting of sites on sample basis and undertaking expert opinion once a year – it was found that there was no violation of free prior and informed consent - this risk gets mitigated & becomes low risk.</p>	<p>MPM and KFDC informed that they have not received any objection from anyone regarding their plantation or harvesting activity. Based on above findings Risk is Low.</p>
1.15	<p>1.15 Indigenous peoples rights Risk Designation: Specified Risk</p> <p>Control Measure Private Source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. In all the districts of Karnataka Land tenure and management rights are will defined. Further, Grasim Harihar Field staff visits harvesting plots to check that Indigenous peoples rights are not denied. Staff records his observation in “Controlled Wood Risk Assessment Check list” document for at least one farmer from around 5% of the Wood Trucks that are supplied on daily basis. DH / SH – Wood Procurement cross checks 1% of the records checked by field staff. Visited plots details will be maintained in registers at Field Locations and monitored from HQ at Kumarpatnam. Stakeholder Consultation and Field Verification will confirm that Indigenous peoples rights are not being denied.</p>	<p>Field Staffs visited 1,480 plots. No indigenous people were found to be living around the harvesting sites. Based on above findings Risk is Low.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Government Sources - The Government Agencies grow Eucalyptus & Acacia Plantation on the lands allocated to them for the same purpose. Stakeholder Consultation and Field Verification will confirm that Indigenous peoples rights are not being denied. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations. Expert Opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – visiting of sites on sample basis and checking the land ownership it is ensured that the farmer is legal owner of the land and the interview of community staying nearby it was found that indigenous people rights are not being denied. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated & becomes low risk.</p>	
1.16	<p>1.16 Classification of species, quantities, qualities Risk Designation: Specified Risk</p> <p>Control Measure Private Source - Grasim Harihar ensures that the suppliers mentions the correct classification of the goods (species, quantities, quality) and pay all the relevant transit fees, this is ensured through E-waybill with every truck. The challan /sales documents will have details of the species, weight of material in MT and other details about the supplier etc, Government Source - Grasim Harihar ensures that the suppliers mention the correct classification of the goods (species, quantities, quality) and pay all the relevant transit fees, this is ensured through E-waybill with every truck. The challan /sales documents will have details of the species, weight of material in MT and other details about the supplier etc,</p> <p>Desired Outcome: With the above control measure – by checking the sales, delivery, invoice and tax documents with each consignment where supplier clearly mentions species name, quantities (in MT) and qualities - this risk gets mitigated and becomes Low risk.</p>	Not applicable as Field Verification not undertaken as control measure.
1.17	<p>1.17 Trade and transport Risk Designation: Specified Risk</p> <p>Control Measure</p>	

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Private Source - Grasim Harihar ensures that the suppliers mention the correct tonnage by the suppliers, classification of the goods and pay all the relevant taxes, this is ensured through the challan /sales documents that have details of the species, weight of material in MT and other details about the supplier etc, Details of species and the quantity transported shall be documented in the legal receipts</p> <p>Government Source - Grasim Harihar ensures that the Government agencies mentioned the correct tonnage, classification of the goods and pay all the relevant taxes, this is ensured through the challan /sales documents that have details of the species, weight of material in MT and other details about the supplier (government agency) etc, Details of species and the quantity transported shall be documented in the legal receipts</p> <p>Desired Outcome: With the above control measure – by checking the sales, delivery, invoice and tax documents with each consignment where supplier clearly mentions species name, quantities (in MT) and qualities - this risk gets mitigated and becomes Low risk.</p>	Not applicable as Field Verification not undertaken as control measure.
1.19	<p>1.19 Custom regulations Risk Designation: Specified Risk</p> <p>Control Measure Private Source - At Grasim Harihar, Viscose staple fibre is produced and is sold in India. Wherever required, Grasim Harihar ensures compliance with Export Policies. Government Source - At Grasim Harihar, Viscose staple fibre is produced and is sold in India. Wherever required, Grasim Harihar ensures compliance with Export Policies.</p> <p>Desired Outcome: With the above control measure – by adhering to the Custom regulations when VSF will be sold outside India - this risk gets mitigated and becomes Low risk.</p>	Not applicable as Field Verification not undertaken as control measure.
1.20	<p>1.20 CITES Risk Designation: Specified Risk</p> <p>Control Measure</p>	Field Staffs visited 1,480 plots. Species being harvested were only Eucalyptus & Acacia. All other species

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Private Source - As Grasim Harihar is procuring only Pulp wood species especially – Eucalyptus & Acacia and not procuring the Wood Species mentioned in the annexure 1, 2 or 3 of the CITES (convention on International Trade in Endangered Species of the Wild Fauna and Flora). Eucalyptus & Acacia does not fall under this category.</p> <p>Government Source - As Grasim Harihar is procuring only Pulp wood species especially – Eucalyptus & Acacia and not procuring the Wood Species mentioned in the annexure 1, 2 or 3 of the CITES (convention on International Trade in Endangered Species of the Wild Fauna and Flora). Eucalyptus & Acacia does not fall under this category.</p> <p>Desired Outcome: With the above control measure – ensuring that only Eucalyptus & Acacia spp which is not on CITES list - this risk gets mitigated and becomes Low risk.</p>	<p>of trees if present were not disturbed.</p> <p>Based on above findings Risk is Low.</p>
Controlled wood category 2. Wood harvested in violation of traditional and human rights		
2.2	<p>2.2 Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work. Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source - Grasim Harihar has policies in place that guarantee freedom of association and the right to organize and collective bargaining, and prevent child labour, forced labour and discrimination against women, Adivasi and Dalits in the labour market. During field visit Grasim field staff interviews the labours and check the documents like Aadhar card to verify the labours rights are not being violated.</p> <p>Government Source - Grasim Harihar has policies in place that guarantee freedom of association and the right to organize and collective bargaining, and prevent child labour, forced labour and discrimination against women, Adivasi and Dalits in the labour market. During field visit Grasim field staff interviews the labours and check the documents like Aadhar card to verify the labours rights are not being violated.</p> <p>Desired Outcome: With the above control measure – implementation of Policies, legal contract and further field visit on sampling basis and interviewing workers about their age, payment details, basic amenities etc this risk gets mitigated & becomes low risk. Further expert opinion was also taken once in year and it was found that there is no violation of labour rights in the supply areas - this risk gets mitigated & becomes low risk.</p>	<p>Field Staffs visited 1,480 plots, and interviewed Labours.</p> <p>Aadhar Card and Payment paid details to labour were checked and found ok. No Child labour was found.</p> <p>Payment is being made on tonnage basis which work out to be more than Minimum wage rate prescribed by Govt of Karnataka</p> <p>Based on above findings Risk is Low.</p>
2.3	<p>2.3 The rights of Indigenous and Traditional Peoples are upheld Risk Designation: Specified Risk</p>	<p>Field Staffs visited 1,480 plots.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Control Measure</p> <p>Private Source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. Grasim Harihar field staff verifies the land where the harvesting is in progress and ensures that the rights of Indigenous and Traditional Peoples are upheld. Staff checks for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis. DH/SH cross checks 1% of the records checked by the field staff. The verification record register is being maintained at field Locations and monitored from HQ - Kumarpatnam. Grasim Harihar Wood Procurement Staff records their findings / assessment in the "Controlled Wood Risk Assessment Check list" document.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. Further, Stakeholder Consultation and Field Verification will confirm that the rights of Indigenous and Traditional Peoples are upheld and not violated. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations.</p> <p>Desired Outcome: With the above control measure – visiting of sites on sample basis and checking the land ownership it is ensured that the farmer is legal owner of the land and the interview of community staying nearby it was found that indigenous people rights are not being denied. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated & becomes low risk.</p>	<p>No indigenous people were found to be living around the harvesting sites.</p> <p>Based on above findings Risk is Low.</p>
Controlled wood category 3. Wood from forests in which high conservation values are threatened by management activities		
3.1	<p>3.1 HCV 1 Species diversity: Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels.</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source - At Grasim Harihar, Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species. The pulp wood is sourced from non-</p>	<p>Field Staffs visited 1,480 plots.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>forest areas which are owned by private farmers. They are not ecologically sensitive and high conservation values are not affected.</p> <p>Grasim Harihar Wood Procurement Staff visits the harvesting plantations. Farmer plantations are raised on the private farm lands of the farmers maintained in "Wood Source Mapping" Document. Grasim Harihar Wood Procurement staff randomly verifies the land where the harvesting is in progress and ensures that high conservation values are not threatened by management activities and maintain the "Controlled Wood Risk Assessment Check List" document. Staff will check for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species The pulp wood sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. They are not ecologically sensitive and hence, high conservation values are not affected.</p> <p>Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	<p>Species being harvested were only Eucalyptus & Acacia. All other species of trees if present were not disturbed.</p> <p>Based on above findings Risk is Low.</p>
3.2	<p>HCV 2 Landscape-level ecosystems and mosaics: Large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure</p>	<p>Field Staffs visited 1,480 plots.</p> <p>Species being harvested were only Eucalyptus & Acacia. All other species</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Private Source: At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp, which is not a species naturally grown. The pulp wood is sourced from Private Source are grown on non-forest areas which are owned by private farmers.</p> <p>Grasim Harihar Wood Procurement Staff visits the harvesting plantations. Private plantations are raised on the private farm lands of the farmers. Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensure that HCV 2 is not threatened by Management activities. Staff checks at least one farmer from around 5% of the Wood Trucks that are supplied on to Grasim Harihar on daily basis and maintain the "Controlled Wood Risk assessment check List" document.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp, which is not a species naturally grown. The pulp wood is sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values.</p> <p>Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	<p>of trees if present were not disturbed.</p> <p>Based on above findings Risk is Low.</p>
3.3	<p>HCV 3 Ecosystems and habitats: Rare, threatened, or endangered ecosystems, habitats or refugia Risk Designation: Specified Risk</p> <p>Control Measure Private Source – At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp, which is not a species naturally grown. The pulp wood is sourced from non-forest areas which are owned by private farmers. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species. Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress to confirm that HCV 3 is not threatened by Management activities. Staff checks at least one farmer from around 5% of the Wood Trucks that are supplied on to</p>	<p>Field Staffs visited 1,480 plots.</p> <p>No Rare, threatened, or endangered ecosystems, habitats or refugia observed.</p> <p>Based on above findings Risk is Low.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Grasim Harihar on daily basis and maintain the "Controlled Wood Risk assessment check List" document. SH/DH cross checks 1% of the records checked by field staff.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species The pulp wood sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values.</p> <p>Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	
3.4	<p>3.4 HCV 4 Critical ecosystem services: Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.</p> <p>These services include: consolidation of highly erodible soils including on steep slopes, forests that protect against flooding or forests that provide barriers to fire.</p> <p>a) protection from flooding;</p> <p>b) protection from erosion;</p> <p>c) barriers from destructive fire;</p> <p>d) clean water catchments</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source – At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced from non-forest areas which are owned by private farmers. Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress to ensure that HCV 4 is not threatened by</p>	<p>Field Staffs visited 1,480 plots.</p> <p>It was observed Ponds, Wells, Water Conservation were not being disturbed.</p> <p>Based on above findings Risk is Low.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Management activities. Staff checks for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis and maintains the "Controlled Wood Risk assessment check List" document. SH/DH cross checks 1% of the records checked by field staff.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species The pulp wood sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and ecologically sensitive and hence high conservation values are not affected.</p> <p>Further, Stakeholder Consultation, Expert Opinion and Field Verification will confirm that the Critical Ecosystem Services and being violated. Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	
3.5	<p>3.5 HCV 5 Community needs: Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or indigenous peoples</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source - At Grasim Harihar, Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced through Private Suppliers are from non-forest areas which are owned by private farmers. These are generally waste lands. Hence, will not impact the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.). However, Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensures that HCV 5 is not threatened by Management activities. Field Staff checks for at least one farmer from around 5% of the Wood Trucks that are supplied on to Grasim Harihar on daily basis and</p>	<p>Field Staffs visited 1,480 plots.</p> <p>No indigenous people were found to be living around the harvesting sites.</p> <p>Based on above findings Risk is Low.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>maintain the the "Controlled Wood Risk assessment check List" document. SH/DH cross checks 1% of the records checked by field staff.</p> <p>Government Source - At Grasim Harihar, Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. Hence, will not impact the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.). Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	
3.6	<p>3.6 HCV 6 Cultural values: Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure Private Source - At Grasim Harihar, Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced through Private Suppliers are from non-forest areas which are owned by private farmers. These were either waste lands or marginal lands. Hence, they do not harm the Aesthetic values, Historic values, Social (including economic) values or Spiritual values. Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensures that HCV 6 is not threatened by Management activities. Field Staff will check for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis and maintain the "Controlled Wood Risk assessment check List" document. SH/DH cross checks 1% of the records checked by field staff.</p> <p>Government Source</p>	<p>Field Staffs visited 1,480 plots.</p> <p>It was found that only Eucalyptus & Acacia Plantations from Farmers Land were being harvested. Any site of Cultural Importance were not being disturbed. Like Water wells, Ponds, Worship sites etc.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. Hence, they do not harm the Aesthetic values, Historic values, Social (including economic) values or Spiritual values. Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	Based on above findings Risk is Low.

Source Area : Kurnool, Anantpur, Chittoor, Cuddapah, Nellore, Prakasham, Guntur, Krishna, West Goadavari, East Godavari, Vishakhapatnam, Srikakulam districts of Andhra Pradesh

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
1.1	<p>1.1 Land tenure and Management Rights Risk Designation: Specified Risk Control Measure Private source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. In all the districts of Andhra Pradesh Land tenure and management rights are will defined. Further, Grasim Harihar Field staff visits harvesting plots and will check Records of Rights (RoR) of at least one farmer from around 5% of the Wood Trucks that are supplied on daily basis. DH / SH – Wood Procurement cross checks</p>	Field Staffs visited 160 plots, verified land records with “Meebhoomi” Mobile app. In case of mismatch physical land documents were checked. Farmers were found to be legal owner of the land.

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>1% of the records checked by field staff. Visited plots details is being maintained in registers at Field Locations and monitored from HQ at Kumarpatnam.</p> <p>Land Records are being checked through "Meebhoomi" Mobile App of Govt. of Andhra Pradesh. If case of any difference, Farmers are requested to produce physical document or the relationship proof with the owner of the land.</p> <p>Government Source - Grasim Harihar procures Eucalyptus & Acacia wood from Government agency through participating in tenders floated by various Government departments time to time. Government organizations raise plantation on the own land allocated specifically for raising the Plantations, which are well documented, hence the material sourced from these sources are legal. Government Agencies provides the details of plots (District / Taluka / Village / Forest Range etc) along with the Wood Consignments.</p> <p>Desired Outcome: With the above control measure, it is confirmed that the farmer is the legal owner of land and hence this risk gets mitigated and becomes Low risk.</p>	Based on above findings Risk is Low.
1.5	<p>1.5 Payment of royalties and harvesting fees Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private source – Eucalyptus & Acacia is Pulp Wood Species from Agro Forestry Sources, which does not require the payment of royalties and harvesting fees.</p> <p>Government Source - As Eucalyptus & Acacia is Pulp Wood Species from Agro Forestry Sources, which does not require the payment of royalties and harvesting fees.</p> <p>Desired Outcome: As per Andhra Pradesh Forest Produce Transit Rules,1970, for trading of Eucalyptus & Acacia spp traders have to pay APMC cess, payment receipt of cess is checked by Grasim Accounts Team, hence this risk becomes Low risk.</p>	Not applicable as Field Verification not undertaken as control measure.
1.6	<p>1.6 Value added taxes and other sales taxes Risk Designation: Specified Risk</p> <p>Control Measure</p>	Not applicable as Field Verification not undertaken as control measure.

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Private source - Grasim Harihar, accounts department, ensures that all the applicable taxes such as GST are paid to the suppliers without fail. Each month, through GSTR 2A, it is ensured that the applicable GST is paid by the supplier to the Government. The applicable taxes such as GST is being paid to the suppliers after the receipt of their invoice.</p> <p>Government Source - Grasim Harihar, accounts department, ensures that all the applicable taxes such as GST are paid to the suppliers without fail. Each month, through GSTR 2A, it is ensured that the applicable GST is paid by the supplier to the Government. The applicable taxes such as GST is being paid to the suppliers after the receipt of their invoice.</p> <p>Desired Outcome: With the above control measure it is ensured that the supplier pays the applicable taxes and this risk gets mitigated and becomes Low risk.</p>	
1.7	<p>1.7 Income and profit taxes Risk Designation: Specified Risk for Private Plantation</p> <p>Control Measure Private source - Grasim Harihar, accounts department ensures that applicable taxes, Income and Profit taxes etc are being paid by the suppliers by deducting applicable TDS on invoice amount. Government Supply - Grasim Harihar, accounts department ensures that applicable taxes, Income and Profit taxes etc are being paid by the suppliers by deducting applicable TDS on invoice amount.</p> <p>Desired Outcome: With the above control measure – by deducting the TDS on invoices, the payment of income and profit taxes are being ensured and hence this risk gets mitigated and becomes Low risk.</p>	Not applicable as Field Verification not undertaken as control measure.
1.9	<p>1.9 Protected sites and species Risk Designation: Specified Risk</p> <p>Control Measure Private Source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. In all the districts of Andhra Pradesh Land tenure and management rights are well defined. Further, Grasim Harihar Field staff visits harvesting plots to check if site is protected site of at least one farmer</p>	Field Staffs visited 160 plots, verified land records with "Meebhoomi" Mobile app. In case of mismatch physical land documents were checked.

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>from around 5% of the Wood Trucks that are supplied on daily basis. DH / SH – Wood Procurement cross checks 1% of the records checked by field staff. Visited plots details is being maintained in registers at Field Locations and monitored from HQ at Kumarpatnam.</p> <p>Government Source - The raw material procured from government agencies is through the Tender and Auction as per the notification issued by them. The Government Agencies grow Eucalyptus & Acacia Plantation on the lands allocated to them for the same purpose. The details of the plantations harvested is provided by the concerned agency. The documents pertaining to the land will be available with the concerned agencies. Agencies like Forest Department and Forest Development Corporations are bound by Indian Forest Act 1927, Wildlife Protection Act, 1972 & Forest Conservation Act, 1980. Grasim Harihar will cross check the plantations (Site) of around 5% plots of the total plantations.</p> <p>Desired Outcome: With the above control measure – visiting of sites on sample basis and checking the land ownership it is ensured that the farmer is legal owner of the land and the site is not protected site, also since the species procured is only Eucalyptus & Acacia this risk gets mitigated & becomes low risk.</p>	<p>It was found that it is Farmers land not protected sites. Species being harvested was Eucalyptus & Acacia.</p> <p>Based on above findings Risk is Low.</p>
1.12	<p>1.12 Legal employment Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source - Grasim Harihar ensures Legal Employment through Contract agreement with all the suppliers of wood, failure of which might result in termination of contract, which mentions about non employment of Child Labour etc. Further, Field Verification confirms that Legal Employment are observed during harvesting activities. The payment paid to the Workers are cross checked & maintained in Controlled Wood Risk Assessment Check list.</p> <p>Government Source - Grasim Harihar ensures Legal Employment through legal agreement with all the government agencies who supply wood, failure of which might result in termination of contract, which mentions about non employment of Child Labour etc. Field Verification confirms that Legal Employment is observed during harvesting activities. The payment paid to the Workers are cross checked & maintained in Controlled Wood Risk Assessment Check list.</p>	<p>Field Staffs visited 160 plots, and interviewed Labours. Adhar Card and Payment paid details to labour were checked and found ok. No Child labour was found. Payment is being made on tonnage basis which work out to be more than Minimum wage rate prescribed by Govt of Andhra Pradesh</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Desired Outcome: With the above control measure – implementation of legal contract and further field visit on sampling basis and interviewing workers about their age, payment details, basic amenities etc this risk gets mitigated & becomes low risk.</p>	Based on above findings Risk is Low.
1.13	<p>1.13 Customary rights Risk Designation: Specified Risk</p> <p>Control Measure Private Source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. In all the districts of Andhra Pradesh Land tenure and management rights are well defined. Further, Grasim Harihar Field staff visits harvesting plots to check that customary rights of community is not denied. Staff records their observation in “Controlled Wood Risk Assessment Check list” document for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis. DH / SH – Wood Procurement cross checks 1% of the records checked by field staff. Visited plots details is being maintained in registers at Field Locations and monitored from HQ at Kumarpatnam. Stakeholder Consultation and Field Verification will confirm that customary rights are not being denied. Government Sources - The Government Agencies grow Eucalyptus & Acacia Plantation on the lands allocated to them for the same purpose. Stakeholder Consultation and Field Verification will confirm that customary rights are not being denied. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations.</p> <p>Desired Outcome: With the above control measure – visiting of sites on sample basis and checking the land ownership it is ensured that the farmer is legal owner of the land and the interview of community staying nearby it was found that their customary rights are not being denied - this risk gets mitigated & becomes low risk.</p>	<p>Field Staffs visited 160 plots.</p> <p>It was observed that Places of Cultural and Religious importance were not disturbed due to harvesting activity.</p> <p>Based on above findings Risk is Low.</p>
1.14	<p>1.14 Free prior and informed consent Risk Designation: Low Risk for Private Plantations, Specified Risk for Government Plantations</p> <p>Control Measure Private Source: Low Risk</p>	Not applicable as No Wood Procurement done from Govt Source of Andhra Pradesh State.

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Government Source - The Government Agencies grow Eucalyptus & Acacia Plantation on the lands allocated to them for the same purpose. Stakeholder Consultation and Field Verification will confirm that Free prior and informed consent was availed. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations. Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure - visiting of sites on sample basis and undertaking expert opinion once a year – it was found that there was no violation of free prior and informed consent - this risk gets mitigated & becomes low risk.</p>	
1.15	<p>1.15 Indigenous peoples rights Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. In all the districts of Andhra Pradesh Land tenure and management rights are well defined. Further, Grasim Harihar Field staff visits harvesting plots to check that Indigenous peoples rights are not denied. Staff records his observation in “Controlled Wood Risk Assessment Check list” document for at least one farmer from around 5% of the Wood Trucks that are supplied on daily basis. DH / SH – Wood Procurement cross checks 1% of the records checked by field staff. Visited plots details is being maintained in registers at Field Locations and monitored from HQ at Kumarpatnam.</p> <p>Stakeholder Consultation and Field Verification will confirm that Indigenous peoples rights are not being denied.</p> <p>Government Sources - The Government Agencies grow Eucalyptus & Acacia Plantation on the lands allocated to them for the same purpose. Stakeholder Consultation and Field Verification will confirm that Indigenous peoples rights are not being denied. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations. Expert Opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – visiting of sites on sample basis and checking the land ownership it is ensured that the farmer is legal owner of the land and the interview of community staying nearby it was found that</p>	<p>Field Staffs visited 160 plots.</p> <p>No indigenous people were found to be living around the harvesting sites.</p> <p>Based on above findings Risk is Low.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	indigenous people rights are not being denied. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated & becomes low risk.	
1.16	<p>1.16 Classification of species, quantities, qualities Risk Designation: Specified Risk</p> <p>Control Measure Private Source - Grasim Harihar ensures that the suppliers mention the correct classification of the goods (species, quantities, quality) and pay all the relevant transit fees, this is ensured through E-waybill with every truck. The challan /sales documents will have details of the species, weight of material in MT and other details about the supplier etc, Government Source - Grasim Harihar ensures that the suppliers mention the correct classification of the goods (species, quantities, quality) and pay all the relevant transit fees, this is ensured through E-waybill with every truck. The challan /sales documents will have details of the species, weight of material in MT and other details about the supplier etc,</p> <p>Desired Outcome: With the above control measure – by checking the sales, delivery, invoice and tax documents with each consignment where supplier clearly mentions species name, quantities (in MT) and qualities - this risk gets mitigated and becomes Low risk.</p>	Not applicable as Field Verification not undertaken as control measure.
1.17	<p>1.17 Trade and transport Risk Designation: Specified Risk</p> <p>Control Measure Private Source - Grasim Harihar ensures that the suppliers mention the correct tonnage by the suppliers, classification of the goods and pay all the relevant taxes, this is ensured through the challan /sales documents that have details of the species, weight of material in MT and other details about the supplier etc, Details of species and the quantity transported shall be documented in the legal receipts Government Source - Grasim Harihar ensures that the Government agencies mentioned the correct tonnage, classification of the goods and pay all the relevant taxes, this is ensured through the challan /sales documents that</p>	Not applicable as Field Verification not undertaken as control measure.

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>have details of the species, weight of material in MT and other details about the supplier (government agency) etc, Details of species and the quantity transported shall be documented in the legal receipts</p> <p>Desired Outcome: With the above control measure – by checking the sales, delivery, invoice and tax documents with each consignment where supplier clearly mentions species name, quantities (in MT) and qualities - this risk gets mitigated and becomes Low risk.</p>	
1.19	<p>1.19 Custom regulations Risk Designation: Specified Risk</p> <p>Control Measure Private Source - At Grasim Harihar, Viscose staple fibre is produced and is sold in India. Wherever required, Grasim Harihar ensures compliance with Export Policies. Government Source - At Grasim Harihar, Viscose staple fibre is produced and is sold in India. Wherever required, Grasim Harihar ensures compliance with Export Policies.</p> <p>Desired Outcome: With the above control measure – by adhering to the Custom regulations when VSF will be sold outside India - this risk gets mitigated and becomes Low risk.</p>	<p>Not applicable as Field Verification not undertaken as control measure.</p>
1.20	<p>1.20 CITES Risk Designation: Specified Risk</p> <p>Control Measure Private Source - As Grasim Harihar is procuring only Pulp wood species especially – Eucalyptus & Acacia and not procuring the Wood Species mentioned in the annexure 1, 2 or 3 of the CITES (convention on International Trade in Endangered Species of the Wild Fauna and Flora). Eucalyptus & Acacia does not fall under this category. Government Source - As Grasim Harihar is procuring only Pulp wood species especially – Eucalyptus & Acacia and not procuring the Wood Species mentioned in the annexure 1, 2 or 3 of the CITES (convention on International Trade in Endangered Species of the Wild Fauna and Flora). Eucalyptus & Acacia does not fall under this category.</p>	<p>Field Staffs visited 1,480 plots. Species being harvested were only Eucalyptus & Acacia. All other species of trees if present were not disturbed.</p> <p>Based on above findings Risk is Low.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	Desired Outcome: With the above control measure – ensuring that only Eucalyptus & Acacia spp which is not on CITES list - this risk gets mitigated and becomes Low risk.	
Controlled wood category 2. Wood harvested in violation of traditional and human rights		
2.2	<p>2.2 Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work. Risk Designation: Specified Risk</p> <p>Control Measure Private Source - Grasim Harihar has policies in place that guarantee freedom of association and the right to organize and collective bargaining, and prevent child labour, forced labour and discrimination against women, Adivasi and Dalits in the labour market. During field visit Grasim field staff interviews the labours and checks the documents like Aadhar card to verify that the labour rights are not being violated. Government Source - Grasim Harihar has policies in place that guarantee freedom of association and the right to organize and collective bargaining, and prevent child labour, forced labour and discrimination against women, Adivasi and Dalits in the labour market. During field visit Grasim field staff interviews the labours and checks the documents like Aadhar card to verify that the labour rights are not being violated.</p> <p>Desired Outcome: With the above control measure – implementation of Policies, legal contract and further field visit on sampling basis and interviewing workers about their age, payment details, basic amenities etc this risk gets mitigated & becomes low risk. Further expert opinion was also taken once in year and it was found that there is no violation of labour rights in the supply areas - this risk gets mitigated & becomes low risk.</p>	<p>Field Staffs visited 160 plots, and interviewed Labours. Aadhar Card and Payment paid details to labour were checked and found ok. No Child labour was found. Payment is being made on tonnage basis which work out to be more than Minimum wage rate prescribed by Govt of Andhra Pradesh</p> <p>Based on above findings Risk is Low.</p>
2.3	<p>2.3 The rights of Indigenous and Traditional Peoples are upheld Risk Designation: Specified Risk</p> <p>Control Measure Private Source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. Grasim Harihar field staff verifies the land where the harvesting is in progress and ensures that the rights of Indigenous and Traditional Peoples are upheld. Staff checks for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis. DH/SH cross checks 1% of the</p>	<p>Field Staffs visited 160 plots. No indigenous people were found to be living around the harvesting sites. Based on above findings Risk is Low.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>records checked by the field staff. The verification record register is being maintained at field Locations and monitored from HQ - Kumarpatnam. Grasim Harihar Wood Procurement Staff records their findings / assessment in the "Controlled Wood Risk Assessment Check list" document.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. Further, Stakeholder Consultation and Field Verification will confirm that the rights of Indigenous and Traditional Peoples are upheld and not violated. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations.</p> <p>Desired Outcome: With the above control measure – visiting of sites on sample basis and checking the land ownership it is ensured that the farmer is legal owner of the land and the interview of community staying nearby it was found that indigenous people rights are not being denied. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated & becomes low risk.</p>	
Controlled wood category 3. Wood from forests in which high conservation values are threatened by management activities		
3.1	<p>3.1 HCV 1 Species diversity: Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels.</p> <p>Risk Designation: Specified Risk Control Measure</p> <p>Private Source - At Grasim Harihar, Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species. The pulp wood is sourced from non-forest areas which are owned by private farmers. They are not ecologically sensitive and high conservation values are not affected.</p> <p>Grasim Harihar Wood Procurement staff randomly verifies the land where the harvesting is in progress and ensures that high conservation values are not threatened by management activities and maintain the "Controlled Wood Risk Assessment Check List" document. Staff will check for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis. SH/DH cross checks 1% of the records checked by field staff.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species The pulp wood is sourced through</p>	<p>Field Staffs visited 160 plots.</p> <p>Species being harvested were only Eucalyptus & Acacia. All other species of trees if present were not disturbed.</p> <p>Based on above findings Risk is Low.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. They are not ecologically sensitive and hence, high conservation values are not affected.</p> <p>Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	
3.2	<p>HCV 2 Landscape-level ecosystems and mosaics: Large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source: At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp, which is not a species naturally grown. The pulp wood is sourced from Private Source are grown on non-forest areas which are owned by private farmers. Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensure that HCV 2 is not threatened by Management activities. Staff checks for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis and maintain the “Controlled Wood Risk assessment check List” document. SH/DH cross checks 1% of the records checked by field staff.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp, which is not a species naturally grown. The pulp wood sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values.</p> <p>Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that</p>	<p>Field Staffs visited 160 plots.</p> <p>Species being harvested were only Eucalyptus & Acacia. All other species of trees if present were not disturbed.</p> <p>Based on above findings Risk is Low.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.	
3.3	<p>HCV 3 Ecosystems and habitats: Rare, threatened, or endangered ecosystems, habitats or refugia Risk Designation: Specified Risk</p> <p>Control Measure Private Source – At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp, which is not a species naturally grown. The pulp wood is sourced from non-forest areas which are owned by private farmers. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species. The pulp wood is sourced from non- forest areas which are owned by private farmers. Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensures that that HCV 3 is not threatened by Management activities. Staff will check for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis and maintain the “Controlled Wood Risk assessment check List” document. SH/DH cross checks 1% of the records checked by field staff.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species The pulp wood is sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	<p>Field Staffs visited 160 plots. No Rare, threatened, or endangered ecosystems, habitats or refugia observed.</p> <p>Based on above findings Risk is Low.</p>
3.4	3.4 HCV 4 Critical ecosystem services: Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.	

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>These services include: consolidation of highly erodible soils including on steep slopes, forests that protect against flooding or forests that provide barriers to fire.</p> <ul style="list-style-type: none"> a) protection from flooding; b) protection from erosion; c) barriers from destructive fire; d) clean water catchments <p>Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source – At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced from non-forest areas which are owned by private farmers. Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensures that HCV 4 is not threatened by Management activities. Staff checks at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis and maintain the “Controlled Wood Risk assessment check List” document. DH/SH cross checks 1 % of the records checked by field staff.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced from non-forest areas which are owned by plantations of Government Agencies. They are not ecologically sensitive and high conservation values are not affected. Further, Stakeholder Consultation, Expert Opinion and Field Verification will confirm that the Critical Ecosystem Services and being violated. Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	<p>Field Staffs visited 160 plots.</p> <p>It was observed Ponds, Wells, Water Conservation were not being disturbed.</p> <p>Based on above findings Risk is Low.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
3.5	<p>3.5 HCV 5 Community needs: Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or indigenous peoples Risk Designation: Specified Risk</p> <p>Control Measure Private Source - At Grasim Harihar, Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced through Private Suppliers are from non-forest areas which are owned by private farmers. These are waste lands. Hence, will not impact the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.). Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensures that HCV 5 is not threatened by Management activities. Field Staff checks for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis and maintain the the "Controlled Wood Risk assessment check List" document. Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. Hence, will not impact the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.). Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	<p>Field Staffs visited 160 plots. No indigenous people were found to be living around the harvesting sites. Based on above findings Risk is Low.</p>
3.6	<p>3.6 HCV 6 Cultural values: Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples Risk Designation: Specified Risk</p>	<p>Field Staffs visited 160 plots.</p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Control Measure</p> <p>Private Source - At Grasim Harihar, Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced through Private Suppliers are from non-forest areas which are owned by private farmers. These were either waste lands or marginal lands. Hence, they do not harm the Aesthetic values, Historic values, Social (including economic) values or Spiritual values. Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensures that HCV 6 is not threatened by Management activities. Field Staff checks at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis and maintain the "Controlled Wood Risk assessment check List" document. SH/DH cross checks 1% of the records checked by the field staff.</p> <p>Government Source</p> <p>At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. Hence, they do not harm the Aesthetic values, Historic values, Social (including economic) values or Spiritual values.</p> <p>Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	<p>It was found that only Eucalyptus & Acacia Plantations from Farmers Land were being harvested. Any site of Cultural Importance were not being disturbed. Like Water wells, Ponds, Worship sites etc.</p> <p>Based on above findings Risk is Low.</p>

Source Area: Adilabad, Nizamabad, Karimnagar, Sangareddy, Rangareddy, Mehbubnagar, Nalgonda, Hyderabad, Warangal, Khammam districts of Telangana

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
1.1	<p>1.1 Land tenure and Management Rights Risk Designation: Specified Risk</p> <p>Control Measure Private source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. In all the districts of Telangana Land tenure and management rights are well defined. Further, Grasim Harihar Field staff visits harvesting plots and checks Records of Rights (RoR) of at least one farmer from around 5% of the Wood Trucks that are supplied on daily basis. DH / SH – Wood Procurement cross checks 1% of the records checked by field staff. Visited plots details is being maintained in registers at Field Locations and monitored from HQ at Kumarpatnam. Land Records are checked through “Dharani” Mobile App of Govt. of Telangana. If case of any difference, Farmers are requested to produce physical document or the relationship proof with the owner of the land. Government Source - Grasim Harihar procures Eucalyptus & Acacia wood from Government agency through participating in tenders floated by various Government departments time to time. Government organizations raise plantation on the own land allocated specifically for raising the Plantations, which are well documented, hence the material sourced from these sources are legal. Government Agencies provides the details of plots (District / Taluka / Village / Forest Range etc) along with the Wood Consignments.</p> <p>Desired Outcome: With the above control measure, it is confirmed that the farmer is the legal owner of land and hence this risk gets mitigated and becomes Low risk.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>
1.5	<p>1.5 Payment of royalties and harvesting fees Risk Designation: Specified Risk</p> <p>Control Measure Private source – Eucalyptus & Acacia is Pulp Wood Species from Agro Forestry Sources, which does not require the payment of royalties and harvesting fees.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Government Source - As Eucalyptus & Acacia is Pulp Wood Species from Agro Forestry Sources, which does not require the payment of royalties and harvesting fees.</p> <p>Desired Outcome: With the above stated fact, this risk gets mitigated and becomes Low risk</p>	<p><i>done from Telangana State</i></p>
1.6	<p>1.6 Value added taxes and other sales taxes Risk Designation: Specified Risk</p> <p>Control Measure Private source - Grasim Harihar, accounts department, ensures that all the applicable taxes such as GST are paid to the suppliers without fail. Each month, through GSTR 2A, it is ensured that the applicable GST is paid by the supplier to the Government. The applicable taxes such as GST is being paid to the suppliers after the receipt of their invoice. Government Source - Grasim Harihar, accounts department, ensures that all the applicable taxes such as GST are paid to the suppliers without fail. Each month, through GSTR 2A, it is ensured that the applicable GST is paid by the supplier to the Government. The applicable taxes such as GST is being paid to the suppliers after the receipt of their invoice.</p> <p>Desired Outcome: With the above control measure it is ensured that the supplier pays the applicable taxes and this risk gets mitigated and becomes Low risk.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>
1.7	<p>1.7 Income and profit taxes Risk Designation: Specified Risk for Private Plantation</p> <p>Control Measure Private source - Grasim Harihar, accounts department ensures that applicable taxes, Income and Profit taxes are being paid by the suppliers by deducting applicable TDS on the invoices. Government Supply - Grasim Harihar, accounts department ensures that applicable taxes, Income and Profit taxes are being paid by the suppliers by deducting applicable TDS on the invoices.</p> <p>Desired Outcome: With the above control measure – by deducting the TDS on invoices, the payment of income and profit taxes are being ensured and hence this risk gets mitigated and becomes Low risk.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
1.9	<p>1.9 Protected sites and species Risk Designation: Specified Risk</p> <p>Control Measure Private Source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. In all the districts of Telangana Land tenure and management rights are well defined. Further, Grasim Harihar Field staff visits harvesting plots to check if site is protected site of at least one farmer from around 5% of the Wood Trucks that are supplied on daily basis. DH / SH – Wood Procurement cross checks 1% of the records checked by field staff. Visited plots details is being maintained in registers at Field Locations and monitored from HQ at Kumarpatnam.</p> <p>Government Source - The raw material procured from government agencies is through the Tender and Auction as per the notification issued by them. The Government Agencies grow Eucalyptus & Acacia Plantation on the lands allocated to them for the same purpose. The details of the plantations to be harvested are provided by the concerned agency. Agencies like Forest Department and Forest Development Corporations are bound by Indian Forest Act 1927, Wildlife Protection Act, 1972 & Forest Conservation Act, 1980. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations.</p> <p>Desired Outcome: With the above control measure – visiting of sites on sample basis and checking the land ownership it is ensured that the farmer is legal owner of the land and the site is not protected site, also since the species procured is only Eucalyptus & Acacia this risk gets mitigated & becomes low risk.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>
1.12	<p>1.12 Legal employment Risk Designation: Specified Risk</p> <p>Control Measure Private Source - Grasim Harihar ensures Legal Employment through Contract agreement with all the suppliers of wood, failure of which might result in termination of contract, which mentions about non employment of Child Labour etc. Further,</p>	<p><i>No field verification was undertaken as there was no Wood Procurement</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Field Verification confirms that Legal Employment are observed during harvesting activities. The payment paid to the Workers are cross checked & maintained in Controlled Wood Risk Assessment Check list.</p> <p>Government Source - Grasim Harihar ensures Legal Employment through legal agreement with all the govt agencies who supply wood, failure of which might result in termination of contract, which mentions about non employment of Child Labour etc. Further, Field Verification confirms that Legal Employment are observed during harvesting activities. The payment paid to the Workers are cross checked & maintained in Controlled Wood Risk Assessment Check list.</p> <p>Desired Outcome: With the above control measure – implementation of legal contract and further field visit on sampling basis and interviewing workers about their age, payment details, basic amenities etc this risk gets mitigated & becomes low risk.</p>	<p><i>done from Telangana State</i></p>
1.13	<p>1.13 Customary rights Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. In all the districts of Telangana Land tenure and management rights are well defined. Further, Grasim Harihar Field staff visits harvesting plots to check that customary rights of community is not denied. Staff records their observation in "Controlled Wood Risk Assessment Check list" document for at least one farmer from around 5% of the Wood Trucks that are supplied on daily basis. DH / SH – Wood Procurement cross checks 1% of the records checked by field staff. Visited plots details is being maintained in registers at Field Locations and monitored from HQ at Kumarpatnam. Stakeholder Consultation and Field Verification will confirm that customary rights are not being denied.</p> <p>Government Sources - The Government Agencies grow Eucalyptus & Acacia Plantation on the lands allocated to them for the same purpose. Stakeholder Consultation and Field Verification will confirm that customary rights are not being denied. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Desired Outcome: With the above control measure – visiting of sites on sample basis and checking the land ownership it is ensured that the farmer is legal owner of the land and the interview of community staying nearby it was found that their customary rights are not being denied - this risk gets mitigated & becomes low risk.</p>	
1.14	<p>1.14 Free prior and informed consent Risk Designation: Low Risk for Private Plantations, Specified Risk for Government Plantations</p> <p>Control Measure Private Source: Low Risk Government Source - The Government Agencies grow Eucalyptus & Acacia Plantation on the lands allocated to them for the same purpose. Stakeholder Consultation and Field Verification will confirm that Free prior and informed consent was availed. Grasim Harihar will cross check the plantations (Site) of around 5% plots of the total plantations. Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure - visiting of sites on sample basis and undertaking expert opinion once a year – it was found that there was no violation of free prior and informed consent - this risk gets mitigated & becomes low risk.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>
1.15	<p>1.15 Indigenous peoples rights Risk Designation: Specified Risk</p> <p>Control Measure Control Measure Private Source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. In all the districts of Telangana Land tenure and management rights are well defined. Further, Grasim Harihar Field staff visits harvesting plots to check that Indigenous peoples rights are not denied. Staff records his observation in “Controlled Wood Risk Assessment Check list” document for at least one farmer from around 5% of the Wood Trucks that are supplied on daily basis. DH / SH – Wood Procurement cross checks 1% of the records checked by field staff. Visited plots details is being maintained in registers at Field Locations and monitored from HQ at Kumarpatnam.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Stakeholder Consultation and Field Verification will confirm that Indigenous peoples rights are not being denied.</p> <p>Government Sources - The Government Agencies grow Eucalyptus & Acacia Plantation on the lands allocated to them for the same purpose. Stakeholder Consultation and Field Verification will confirm that Indigenous peoples rights are not being denied. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations. Expert Opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – visiting of sites on sample basis and checking the land ownership it is ensured that the farmer is legal owner of the land and the interview of community staying nearby it was found that indigenous people rights are not being denied. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated & becomes low risk.</p>	
1.16	<p>1.16 Classification of species, quantities, qualities Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source - Grasim Harihar ensures that the suppliers mention the correct classification of the goods (species, quantities, quality) and pay all the relevant transit fees, this is ensured through E-waybill with every truck. The challan /sales documents will have details of the species, weight of material in MT and other details about the supplier etc,</p> <p>Government Source - Grasim Harihar ensures that the suppliers mention the correct classification of the goods (species, quantities, quality) and pay all the relevant transit fees, this is ensured through E-waybill with every truck. The challan /sales documents will have details of the species, weight of material in MT and other details about the supplier etc,</p> <p>Desired Outcome: With the above control measure – by checking the sales, delivery, invoice and tax documents with each consignment where supplier clearly mentions species name, quantities (in MT) and qualities - this risk gets mitigated and becomes Low risk.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>
1.17	<p>1.17 Trade and transport Risk Designation: Specified Risk</p>	<p><i>No field verification was undertaken as</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Control Measure</p> <p>Private Source - Grasim Harihar ensures that the suppliers mention the correct tonnage by the suppliers, classification of the goods and pay all the relevant taxes, this is ensured through the challan /sales documents that have details of the species, weight of material in MT and other details about the supplier etc, Details of species and the quantity transported shall be documented in the legal receipts</p> <p>Government Source - Grasim Harihar ensures that the Government agencies mentioned the correct tonnage, classification of the goods and pay all the relevant taxes, this is ensured through the challan /sales documents that have details of the species, weight of material in MT and other details about the supplier (government agency) etc, Details of species and the quantity transported shall be documented in the legal receipts</p> <p>Desired Outcome: With the above control measure – by checking the sales, delivery, invoice and tax documents with each consignment where supplier clearly mentions species name, quantities (in MT) and qualities - this risk gets mitigated and becomes Low risk.</p>	<p><i>there was no Wood Procurement done from Telangana State</i></p>
1.19	<p>1.19 Custom regulations</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source - At Grasim Harihar, Viscose staple fibre is produced and is sold in India. Wherever required, Grasim Harihar ensures compliance with Export Policies.</p> <p>Government Source - At Grasim Harihar, Viscose staple fibre is produced and is sold in India. Wherever required, Grasim Harihar ensures compliance with Export Policies.</p> <p>Desired Outcome: With the above control measure – by adhering to the Custom regulations when VSF will be sold outside India - this risk gets mitigated and becomes Low risk.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>
1.20	<p>1.20 CITES</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure</p>	<p><i>No field verification was undertaken as there was no</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Private Source - As Grasim Harihar is procuring only Pulp wood species especially – Eucalyptus & Acacia and not procuring the Wood Species mentioned in the annexure 1, 2 or 3 of the CITES (convention on International Trade in Endangered Species of the Wild Fauna and Flora). Eucalyptus & Acacia does not fall under this category.</p> <p>Government Source - As Grasim Harihar is procuring only Pulp wood species especially – Eucalyptus & Acacia and not procuring the Wood Species mentioned in the annexure 1, 2 or 3 of the CITES (convention on International Trade in Endangered Species of the Wild Fauna and Flora). Eucalyptus & Acacia does not fall under this category.</p> <p>Desired Outcome: With the above control measure – ensuring that only Eucalyptus & Acacia spp which is not on CITES list - this risk gets mitigated and becomes Low risk.</p>	<p><i>Wood Procurement done from Telangana State</i></p>
Controlled wood category 2. Wood harvested in violation of traditional and human rights		
2.2	<p>2.2 Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work. Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source - Grasim Harihar has policies in place that guarantee freedom of association and the right to organize and collective bargaining, and prevent child labour, forced labour and discrimination against women, Adivasi and Dalits in the labour market. During field visit Grasim field staff interviews the labours and checks the documents like Aadhar card to verify the labourrights are not being violated.</p> <p>Government Source - Grasim Harihar has policies in place that guarantee freedom of association and the right to organize and collective bargaining, and prevent child labour, forced labour and discrimination against women, Adivasi and Dalits in the labour market. During field visit Grasim field staff interviews the labours and checks the documents like Aadhar card to verify the labours rights are not being violated.</p> <p>Desired Outcome: With the above control measure – implementation of Policies, legal contract and further field visit on sampling basis and interviewing workers about their age, payment details, basic amenities etc this risk gets mitigated & becomes low risk. Further expert opinion was also taken once in year and it was found that there is no violation of labour rights in the supply areas - this risk gets mitigated & becomes low risk.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
2.3	<p>2.3 The rights of Indigenous and Traditional Peoples are upheld Risk Designation: Specified Risk</p> <p>Control Measure Private Source - Grasim Harihar procures Eucalyptus & Acacia wood from Private Suppliers by entering into Supply Contract. Private Suppliers are procuring Eucalyptus & Acacia Wood from farmers, who are growing Eucalyptus & Acacia on their own farm lands. Grasim Harihar field staff verifies the land where the harvesting is in progress and ensures that the rights of Indigenous and Traditional Peoples are upheld. Staff checks for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis. DH/SH cross checks 1% of the records checked by the field staff. The verification record register is being maintained at field Locations and monitored from HQ - Kumarpatnam. Grasim Harihar Wood Procurement Staff records their findings / assessment in the "Controlled Wood Risk Assessment Check list" document. Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. Further, Stakeholder Consultation and Field Verification will confirm that the rights of Indigenous and Traditional Peoples are upheld and not violated. Grasim Harihar cross checks the plantations (Site) of around 5% plots of the total plantations.</p> <p>Desired Outcome: With the above control measure – visiting of sites on sample basis and checking the land ownership it is ensured that the farmer is legal owner of the land and the interview of community staying nearby it was found that indigenous people rights are not being denied. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated & becomes low risk.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>
Controlled wood category 3. Wood from forests in which high conservation values are threatened by management activities		
3.1	<p>3.1 HCV 1 Species diversity: Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels.</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure</p>	<p><i>No field verification was undertaken as there was no Wood Procurement</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Private Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species. The pulp wood is sourced from non-forest areas which are owned by private farmers. They are not ecologically sensitive and hence high conservation values are not affected. Grasim Harihar Wood Procurement Staff visits the harvesting plantations. Farmer plantations are raised on the private farm lands of the farmers maintained in "Wood Source Mapping" Document. Grasim Harihar Wood Procurement staff randomly verifies the land where the harvesting is in progress and ensures that high conservation values are not threatened by management activities and maintain the "Controlled Wood Risk Assessment Check List" document. Staff checks for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis. SH/DH cross checks 1% of the records checked by field staff.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species The pulp wood is sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. They are not ecologically sensitive and hence, high conservation values are not affected. Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	<p><i>done from Telangana State</i></p>
3.2	<p>HCV 2 Landscape-level ecosystems and mosaics: Large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Private Source: At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp, which is not a species naturally grown. The pulp wood is sourced from Private Source are grown on non-forest areas which are owned by private farmers. Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensure that HCV 2 is not threatened by Management activities. Staff will check for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis and maintain the "Controlled Wood Risk assessment check List" document. SH/DH cross checks 1% of the records checked by field staff.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp, which is not a species naturally grown. The pulp wood is sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	
3.3	<p>HCV 3 Ecosystems and habitats: Rare, threatened, or endangered ecosystems, habitats or refugia Risk Designation: Specified Risk</p> <p>Control Measure Private Source – At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp, which is not a species naturally grown. The pulp wood is sourced from non-forest areas which are owned by private farmers. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species. Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensures that that HCV 3 is not threatened by Management activities. Staff checks at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis and maintain the "Controlled Wood Risk assessment check List" document. SH/DH cross checks 1% of the records checked by field staff.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. Eucalyptus & Acacia is not listed as a rare, threatened or endangered species The pulp wood is sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	
3.4	<p>3.4 HCV 4 Critical ecosystem services: Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes. These services include: consolidation of highly erodible soils including on steep slopes, forests that protect against flooding or forests that provide barriers to fire. a) protection from flooding; b) protection from erosion; c) barriers from destructive fire; d) clean water catchments Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source – At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced from non-forest areas which are owned by private farmers. Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensures that HCV 4 is not threatened by Management activities. Staff checks at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis and maintain the “Controlled Wood Risk assessment check List” document. SH/DH cross checks 1% of the records checked by field staff.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced from non-forest areas which are owned by plantations of Government Agencies. They are not ecologically sensitive and high conservation values are not affected. Further, Stakeholder Consultation, Expert Opinion and Field Verification will confirm that the Critical Ecosystem Services and being violated.</p> <p>Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	
3.5	<p>3.5 HCV 5 Community needs: Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or indigenous peoples</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure</p> <p>Private Source - At Grasim Harihar, Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced through Private Suppliers are from non-forest areas which are owned by private farmers. These are waste lands. Hence, will not impact the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.). Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensures that HCV 5 is not threatened by Management activities. Field Staff checks for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis and maintain the the "Controlled Wood Risk assessment check List" document. SH/DH cross checks 1% of the records checked by field staff.</p> <p>Government Source - At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>only and they are not of any conservation and protection values. Hence, will not impact the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, etc.). Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	
3.6	<p>3.6 HCV 6 Cultural values: Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples</p> <p>Risk Designation: Specified Risk</p> <p>Control Measure Private Source - At Grasim Harihar, Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced through Private Suppliers are from non-forest areas which are owned by private farmers. These were either waste lands or marginal lands. Hence, they do not harm the Aesthetic values, Historic values, Social (including economic) values or Spiritual values. Grasim Harihar Wood Procurement staff verifies the land where the harvesting is in progress and ensures that HCV 6 is not threatened by Management activities. Field Staff checks for at least one farmer from around 5% of the Wood Trucks that are supplied to Grasim Harihar on daily basis and maintain the "Controlled Wood Risk assessment check List" document. SH/DH cross checks 1% of the records checked by field staff. Government Source At Grasim Harihar Eucalyptus & Acacia is used as the major raw material for manufacturing of Pulp. The pulp wood is sourced through Govt Suppliers are from the land allocated to these agencies for the purpose of Plantation only and they are not of any conservation and protection values. Hence, they do not harm the Aesthetic values, Historic values, Social (including economic) values or Spiritual values.</p>	<p><i>No field verification was undertaken as there was no Wood Procurement done from Telangana State</i></p>

Indicator	Control Measures	Findings from field verification if undertaken as a control measure
Controlled wood category 1. Illegally harvested wood		
	<p>Expert opinion will be taken once in a year.</p> <p>Desired Outcome: With the above control measure – maintaining and checking the documents – wood source mapping and Controlled Wood Risk Assessment Checklist and field visits in sample basis – it gets established that wood is being sourced from farmers land or land allocated for plantation by the govt. Further expert opinion was also taken once in year and it was found that there is no presence of indigenous people in the supply areas - this risk gets mitigated and becomes Low risk.</p>	

4.b Risk assessment and mitigation for mixing in the supply chain

Participating site	Supply chain type	No. of tiers	Risk of mixing	Control measures	Findings from field verification if undertaken as a control measure
M/S. Harihar Polyfibers & Grasilene Division (Unit of Grasim Industries Limited) Kumarapatnam, Karnataka, India	Private Suppliers	2	There are risk of mixing identified at weighbridges where material from farm arrives in tractors and leaves in trucks after weighing.	Grasim Harihar has made "Wood Source Mapping" mandatory with each consignment which carries Name of Farmers with district, village, taluka and survey number. Consignment without Wood Source mapping is not accepted by Grasim Harihar. Further, Grasim Harihar ensures that Private suppliers mentions correct tonnage, classification of good, source of materials, pay all relevant taxes	After adequate control measures, there are no Risk of mixing in the supply chain

				Desires outcome: With the above control measure this risk will be mitigated and becomes Low Risk.	
	<i>Govt Suppliers</i>	<i>1</i>	No Risk		

5. Technical experts used in the development of control measures

Name	License/ Registration #	Qualification	Scope of service	Source of information
Mr. Sudhanshu Shekhar		P G Diploma in Forestry Management	Risk Category -1	
Mr. Vaibhav Bane		LLB	Risk Category – 2	
Mr. Manjunath H		Graduate in Forestry	Risk Category – 2	
Dr. H D Kulkarni		Ph D	Risk Category – 1, 2, 3	

6. Stakeholder consultation processes

Supply area	Relevant controlled wood category	List of stakeholder groups invited to participate	Summary of comments received from stakeholders	Description of how stakeholder comments were taken into account	Justification for concluding that the material sourced from the area was low risk
Karnataka, Andhra Pradesh, Telangana	Category 1, 2, 3	<ol style="list-style-type: none"> 1. Wood Contractors: <ol style="list-style-type: none"> a. SRI VENKATESHWARA TRADERS b. SINGAMANENI TRADERS c. Sri Peninsula Enterprises d. Moon Star Wood Suppliers e. Ajantha Wood Suppliers f. Omkar Wood Suppliers g. Sree Veerabhadreshwara Traders h. Kingswood Enterprises i. SRS Wood Suppliers j. SRI KRUPANANDA ENTERPRISES 2. Industries / Certificate Holders <ol style="list-style-type: none"> a. West Coast Paper Mills b. ITC c. Tamilnadu News Prints Ltd 3. Government Agencies who deal with Forestry <ol style="list-style-type: none"> a. KFDC Limited b. Karnataka State Forest Industrial Corporation Limited c. Karnataka State Forest Department d. The Mysore Paper Mills Limited e. Andhra Pradesh State Forest Development Corporation f. Telangana State Forest Development Corporation 4. Universities <ol style="list-style-type: none"> a. College of Forestry, Sirsi, Karnataka b. University of Agricultural Sciences c. College of Forestry, Kodagu, Karnataka 	Stakeholder Consultation Meet Scheduled on 27.04.2024. Awaiting Feedback from Stakeholders		

		<ul style="list-style-type: none"> d. A P State Forest Academy, Rajamahendravaram, AP e. Forest College & Research Institute, Hyderabad, Telangana <p>5. Certifying Agencies</p> <ul style="list-style-type: none"> a. Control Union b. NEPCON India Private Ltd <p>6. NGO</p> <ul style="list-style-type: none"> a. Naandi Foundation b. FSC India c. WWF <p>7. Local Communities</p> <p>Published in News Paper</p>			
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7. Complaints procedure

We encourage stakeholders who have suggestions for improvements, comments, or complaints related to our controlled wood due diligence system to contact – **Maruti Patil, AGM & DH – WP, Harihar Polyfibres Ltd, Email – maruti.patil@adityabirla.com, Phone - 9743791252** by mail, email, or phone. We commit to follow up on stakeholder input as soon as we receive it and to provide stakeholders with feedback within 2 weeks.

Any Stake holder having any complaint regarding the organization’s conformity to the requirement of CW certificate will follow procedure laid down below:

1. The stakeholder will take-up their input / comment / complaints with the concerned field staff, not less than the rank of Officer in writing, the acknowledgement receipt after preliminary assessment shall be provided to the complaint within 2-week time of receipt of the complaint.
2. Complaints related to risk designation will be forwarded to FSC National Office.

3. Complaints regarding the breach of any standards of company's-controlled wood policy with supported evidence, will be assessed by HoD Wood Procurement / Wood Procurement Committee. In event evidence considered relevant / significant-
4. Field investigation / verification will be conducted. In case of doubt, will advise the concerned supplier to stop the supplies, immediately.
5. On detailed examination, if the field verification concludes that wood does not meet the requirements as per the Company Policy, FSC Controlled Wood standard, or if field verification is not conducted within 2 months of receipt of complaint, then the supply from that particular source will be excluded from Company's FSC Product Groups and no claims about this material will be made until the supply has been proven the policy and FSC Controlled Wood requirements.
6. Corrective actions taken by the suppliers will be verified to determine whether it is effective. The supplier will be able to supply controlled wood only after it has been proved that corrective actions taken are effective.
7. Further, the Company would notify the CB in case of non-compliance with Controlled Wood requirements, once non-compliance is confirmed from low-risk area. In case of frequent non-compliance in low-risk area, the company will review its risk assessment and necessary action will be taken.
8. The Records of action with regard to such complaints received will be informed to the Complainant, CB and FSC National Office.
9. Records of all complaints received and actions taken will be kept for a minimum of 5 years and would be made available to CB upon request