



Australian Government

Department of Agriculture,  
Fisheries and Forestry

# Timber Legality Framework Risk Assessment Template for Importers

## Verifying FSC or PEFC certification

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### **Disclaimer**

This template has been prepared to assist timber product importers understand, implement and comply with the requirements of the Illegal Logging Prohibition Act 2012 and the Illegal Logging Prohibition Regulation 2012 with respect of their due diligence obligations. It does not constitute legal advice. Timber product importers may elect to seek their own legal advice in relation to the legislation and related matters.

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### **Acknowledgement of Country**

We acknowledge the Traditional Custodians of Australia and their continuing connection to land and sea, waters, environment and community. We pay our respects to the Traditional Custodians of the lands we live and work on, their culture, and their Elders past and present.

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# Read before completing

This is a step-by-step guide on how to use the Timber Legality Framework (TLF) method to assess the risk that your regulated timber product/s was illegally logged.

There are five steps to follow:

- 1) Check the supplier's certification number
- 2) Check if the certificate is valid for the period of supply
- 3) Check if the products or species being supplied are listed
- 4) Check if the product is certified
- 5) Consider any other information that may indicate illegality of harvest

This template provides you with questions to consider and options to address common problems. Use the blank space at each step to detail any risks you identify, and record your risk conclusion on the final page of this template.

# Before beginning your risk assessment: Consider all the information you have been able to gather.

This includes assessing information gathered in supplier questionnaires or gathered during the due diligence process.

Consider:

- Have you been able to obtain sufficient information to inform your risk assessment?
- Does the information cover all timber components (including any paper components) of your product?
- Do the classification of species, quantities, and qualities match across the documentation?
- Can the claims made in the information gathered be verified with evidence?

**IMPORTANT:** If you have been unable to obtain enough information about the species of timber and where it has come from, it will be difficult to conclude that there is low or nil risk that it was illegally logged.

# Step 1: Check the supplier's certification number

Consider:

- Is your supplier's certificate number legitimate?
- Is your supplier the certificate holder?

Certified suppliers should have a unique FSC or PEFC certificate code or number quoted on their certificate (e.g. TT-COC-1234, BMT-PEFC-2334 or SGS-COC-12244). You can verify this code or number by searching on the relevant scheme's website:

- [Forest Stewardship Council \(FSC\)](#)
- [PEFC International](#)

When you have found the certificate details online, check that they match the details given by your supplier. Check that the supplier name and address details match those listed on the website.

For further information:

- [FSC Forest management certification standard](#)
- [FSC chain of custody standard](#)
- [PEFC sustainable forest management standard](#)
- [PEFC chain of custody standard](#)

**Detail what you have considered and any risks you have identified in Step 1 that the product may contain illegally logged timber:**

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## Troubleshooting

- If the number or code has been typed incorrectly (and you cannot find it online) contact your supplier. Ask them to email you a link to the online certificate or contact the scheme and ask about the certificate codes given by the supplier.

- If the FSC/PEFC certificates are not from the direct supplier, you may not be able to complete your risk assessment under the TLF and may need to perform your risk assessment under CSG or RRF.
- If the details of your supplier do not match those on the certificate, you should seek to confirm the authenticity of the certificate. This may involve contacting the scheme, or your supplier.
- If your supplier has claimed the product is FSC or PEFC certified but it is not their name on the certificate, the chain of custody may be broken. You need to get more information from your supplier, or the scheme to verify the authenticity.

# Step 2: Check if the certificate is valid for the period of supply

The expiry date of the supplier's certificate should be listed on the FSC or PEFC's websites.

Consider:

- Is the certificate valid for the period of supply?

**Detail what you have considered and any risks you have identified in Step 2 that the product may contain illegally logged timber:**

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## Troubleshooting

- If the certificate appears to have expired or is currently suspended, you should ask why this has occurred. You may need to discuss this with the supplier or directly with the scheme.



# Step 3: Check if the products or species being supplied are listed

Certified suppliers can supply both certified and non-certified products. You will need to check that the products being supplied are the same as those on your supplier's FSC or PEFC certificate.

Consider:

- Are the products or species being supplied listed on the certificate's record?

**Detail what you have considered and any risks you have identified in Step 3 that the product may contain illegally logged timber:**

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## Troubleshooting

- If the certificate appears to have expired or is currently suspended, you should ask why this has occurred. You may need to contact the supplier or the scheme directly to check this.

# Step 4: Check if the product is certified

After completing all the steps above, it is still possible the supplier has not provided you with a certified product.

Consider:

- Is the certificate number quoted on your invoice(s) and delivery notes? The product description should list the product as FSC or PEFC certified.
- Does the product supplied match the product that was requested?

When importing regulated timber products under a Timber Legality Framework, the certification claim must be provided on sales and delivery documents such as the invoice. This attests to the certified status of the purchased products. It may include a product claim, such as:

- FSC 100%, FSC Mix X%, FSC Mix Credit, FSC Controlled Wood
- X% PEFC Certified, PEFC Controlled Sources

**Detail what you have considered and any risks you have identified in Step 4 that the product may contain illegally logged timber:**

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## Troubleshooting

- If the product does not match what was promised or if the certification claim is not on the invoice, you may need to discuss this with the supplier or directly with the scheme.

# Step 5: Consider any other information that may indicate illegality

Consider:

- Is there any other information you know or ought reasonably to know that may indicate the timber was illegally logged?
  - This includes any other information that may be publicly available on the supplier’s website, about the supplier or their sub-suppliers within the supply chain or information about previous incidents of illegal logging relevant to that product, species or region the importer is sourcing from.
- Have there been any media articles, third party reports, or government statements that would bring the legality of your product(s) into question?
- Is there any other information you know or should know, that would call into question the legality of the product(s)?

Some resources which may assist with this step include:

- [Chatham House – Illegal Logging Portal](#)
- [Forest Trends – Illegal Deforestation and Associated Trade \(IDAT\) Risk Tool](#)
- [World Resources Institute – Global Forest Watch](#)
- [Transparency International – Corruption Perception Index](#)
- [Environmental Investigation Agency \(EIA\)](#)

For additional resources, please visit the [‘Resources for importers’](#) page on our website.

**Detail what you have considered and any risks you have identified in Step 5 that the product may contain illegally logged timber:**

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# Final Risk Conclusion

**Risk identification (check one)**

LOW/NONE

GREATER THAN LOW

**Justification (Detail the basis for arriving at your risk conclusion)**

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RISK ASSESSMENT COMPLETED BY: \_\_\_\_\_

DATE: \_\_\_\_\_

**IMPORTANT:**

If you have assessed the risk using the Timber Legality Framework and decided that your product is a low or nil risk of containing timber that was illegally harvested, you have completed your due diligence risk assessment. You must document your risk conclusion before proceeding to import the timber products.

If you have assessed the risk as greater than low, you must complete another risk assessment using another option (Country Specific Guidelines or Regulated Risk Factors). Where neither the Timber Legality Framework or Country Specific Guidelines assessment options conclude that the risk is low or nil, you must complete a Regulated Risk Factors assessment.