



Australian Government

Department of Agriculture,
Fisheries and Forestry

Regulated Risk Factors Risk Assessment Template for Importers

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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 Regulated Risk Factors (RRF) method to assess the risk that your regulated timber product/s was illegally logged.

There are five steps to follow:

- 1) Consider the prevalence of illegal logging in the area in which the timber in the product was harvested
- 2) Consider the prevalence of illegal harvesting of the species of tree from which the timber in the product is derived
- 3) Consider the prevalence of armed conflict in the area of harvest
- 4) Consider the complexity of the product and the supply chain
- 5) Consider any other information that may indicate illegality of harvest

This template provides you with questions and factors to consider while completing your assessment. 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: Consider the prevalence of illegal logging in the area in which the timber in the product was harvested

Some countries and regions face challenges, such as political instability or corruption, which can limit effective governance and enforcement of forest protection and forestry activities. This can lead to illegal logging activities and leave official documents vulnerable to fraud or forgery. Consider these factors when determining the risk of illegal logging.

Consider:

- Is there much illegal logging in the country and/or area where the timber in the product was harvested?
- Is the timber harvested from a known protected area?
- Can your supplier tell you where the timber has come from?

Third party resources, such as [Preferred by Nature's Timber Sourcing Hub](#) may assist with this step. For further resources, please visit the departments ['Resources for importers'](#) webpage

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

Step 2: Consider the prevalence of illegal harvesting of the species of tree from which the timber in the product is derived

Some timber species are more likely to be illegally logged due to their value, scarcity, or high consumer demand. To answer this question, you need to know which species of timber you are importing, and where it was harvested.

Consider:

- Can your supplier tell you which species of timber are found in your product?
- Can you confirm that the species grows in the area that the supplier claims it came from?
- Is the species listed as 'vulnerable' or 'threatened'?
- Are there any other factors which may indicate that the species is prone to illegal logging in this area? For example, is the species highly sought after and highly valued due to its scarcity?

The [IUCN Red List](#) lists threatened species and may assist with this step. For further resources, please visit the departments '[Resources for importers](#)' webpage.

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

Step 3: Consider the prevalence of armed conflict in the area of harvest

Armed conflict may make it difficult for authorities to control forest resources and ensure legal timber harvesting. You need to establish where the timber was harvested and whether there is armed conflict in that area.

Consider:

- Is there, or has there recently been, armed conflict in the area of harvest?

Online conflict maps may assist with this step:

- [Emmeline Carto – Conflict Map](#)
- [Crisis Group – Conflict Map](#)

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

Step 4: Consider the complexity of the product and the supply chain

Long supply chains (involving multiple parties) and complex composite products (involving multiple timbers or sources) can increase the risk that illegal timber has been used.

Establish and consider the complexity of the supply chain involved in producing your product.

Without a full understanding of the components and their source, you need to consider the increased risk that your product might contain illegally logged timber.

Consider:

- Can you identify the species and origin of all timber components in your product?
- Can you identify all parties in the supply chain?

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

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 harvest of the timber in your product(s) into question?
- Is there any other information you know or should know, that would call into question the legality of harvest of the timber in your product(s)?

Some factors which may indicate a higher risk of illegality include:

- Documents are potentially forged, are inconsistent or have sections / details missing (see [Preferred by Nature – Guide to identifying fake documents](#))
- The supplier is known to deal in illegally logged timber
- The goods are being sold significantly below the market rate
- The appropriate taxes are not included in the price
- The goods are being bought in cash only, or for a lower price without paperwork
- You have been asked to pay a bribe
- You are unable to get rational answers to questions asked

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.

Final Risk Conclusion

Risk identification (circle one)

LOW/NONE

GREATER THAN LOW

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

RISK ASSESSMENT COMPLETED BY: _____

DATE: _____

IMPORTANT:

If you have assessed the risk using the RRF risk assessment method and decided that your product is a low or nil risk of being illegally harvested, you have completed your due diligence risk assessment. You must document your risk conclusion before you proceed to import the timber products.

If you have assessed the risk as greater than low, you must conduct a risk mitigation process.