

Paper Pulp & Timber Policy

We create better experiences together
for a better tomorrow

Summary of Policy

All Own Brand Products and Packaging, and Goods Not For Resale (GNFR), and Store Construction/Fit Out sold/distributed/used through Woolworths Group Limited and its subsidiaries, and in-scope items (including vendor-branded products) imported by Woolworths Group Limited containing paper, pulp, and timber must be sourced in line with the below table regardless of brand/product ownership.

Woolworths Group Limited will ensure a low risk of illegally logged timber being used in the manufacture of Own Brand products, 'Not for Resale' articles, and vendor branded products directly imported into Australia by Woolworths Group Limited, as per the due diligence requirements of the *Illegal Logging Prohibition Act (2012) (Cth)* and the *Illegal Logging Prohibition Regulation (2012) (Cth)* (Henceforth referred to as "**The Law**")

Scope	Requirement	Timelines
Own Brand Product Goods Not For Resale Store Construction/Fit-out sourced and/or imported by an Australian Woolworths Group Business Vendor-Branded Products imported into Australia (E.g. through Free On Board (FOB) Shipping)	1. Either one of the following: - 100% Post-Consumer Recycled Content (Or mix of Post-consumer and Certified content), - FSC certified, - PEFC certified AND 2. Illegal Logging Questionnaire and Risk Assessment Completed (Imports into Australia Only)	All new in-scope items must be compliant at release of this policy. All existing products that come under review need to comply with this policy.
Own Brand Packaging (Primary and Secondary)	Either one of the following: - FSC certified, - PEFC certified, - At Least 70% Recycled Content	

Background

Woolworths Group Limited is a signatory to the Consumer Goods Forum's Deforestation Resolution of 2010 for achieving net-zero deforestation. As part of the 2025 Sustainability Plan, Woolworths Group Limited has pledged to ethically source high-impact commodities, including, but not limited to, soy, palm oil, paper, pulp, and timber products and packaging.

Woolworths Group Limited is supportive of creating a circular economy and will therefore prioritise the use of recycled content where practicable in both products and packaging.

Woolworths Group Limited also recognises its commitment to respecting the human rights of all workers in its supply chains, and notes the particularly detrimental impact that non-sustainable timber sourcing can have on vulnerable communities, including, but not limited to, Indigenous communities and migrant workers. Woolworths Group Limited recognises and respects the land rights of Indigenous communities and endeavours to work with its suppliers so that these expectations are cascaded throughout its supply chains.

Woolworths Group Limited requires that all timber used in its products and packaging is harvested in a manner that:

- Is legal;
- Contributes to Net-zero Deforestation;
- Respects traditional and human rights of workers and Indigenous peoples;
- Protects worker's health and safety;
- Supports ecologically and socially appropriate forest management and restoration;
- Protects High Conservation Value landscapes; and
- Avoids plantations converted from natural woodland.

This policy sets out the minimum sourcing standards for Woolworths Group Limited's paper, pulp, and timber products and packaging to ensure they are procured from sustainable and legal sources. It must be followed in its entirety with exemptions sought in instances of non-compliance.

Policy

In order to ensure compliance to the 2025 Sustainability Plan and where relevant, the Illegal Logging Prohibition Act (2012), all in-scope products and packaging listed in the scope section must meet one of the below listed requirements.

Product Requirements:

The following requirements relate to Products, Goods Not For Resale, and Materials used in Store Construction/Fit-out containing over 5% Paper, Pulp, or Timber by weight.

Products must meet one of the following requirements in order of preference:

- Be made of 100% post-consumer recycled content validated in-line with the relevant Woolworths Group Limited Policy or AS Standard AS14021-2018. Where this is not feasible due to technical or commercial constraints, the balance must be made of independently certified material proven to be derived from legally harvested timber.
- Hold Forest Stewardship Council (FSC) Chain of Custody certification (FSC: 100%, Recycled, or Mix) throughout the entire supply chain. All product sales documentation must contain the licence code for the supplier and the claim for each product (e.g. FSC 100%, Recycled, or Mix). Documentation must be validated in line with the relevant Woolworths Group Limited Procedure; or
- Hold Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody certification (PEFC: Certified or Recycled) throughout the entire supply chain. All product sales documentation must contain the licence code for the supplier and the claim for each product (e.g. PEFC certified or Recycled). Documentation must be validated in line with the relevant Woolworths Group Limited Procedure. Certification to PEFC or a standard recognised by PEFC (e.g. Responsible Wood in Australia) will only be accepted when the forest-based materials have been sourced and milled in countries identified as having a low timber risk score (above 80) by Preferred By Nature. Incases where a country risk score is below 80 as designated by Preferred by Nature, further risk mitigation is to be undertaken.

And:

- Where in-scope of **The Law**; completion of the Illegal Logging Questionnaire by the supplier and approval via low-risk assessment by Woolworths Group Limited *before* shipment to Australia. Suppliers must provide a documented chain of custody to the source of paper pulp or timber.

Packaging Requirements:

The following requirements relate to in-scope¹ Primary and Secondary Packaging of Own Brand products.

Packaging must meet one of the following requirements in order of preference:

- Be made of at least 70% recycled content validated in-line with the current relevant Woolworths Group Limited Policy or AS Standard AS14021-2018. Where this is not feasible due to technical or commercial constraints, the balance up to the specified percentage must be made of independently certified material; or
- Hold Forest Stewardship Council (FSC) Chain of Custody certification (FSC: 100%, Recycled, Mix) throughout the entire supply chain up until the finished packaging manufacturer; or
- Hold Programme for the Endorsement of Forest Certification (PEFC) Chain of Custody certification (PEFC: Certified or Recycled) throughout the entire supply chain up until the finished packaging manufacturer.

NB: Packaging that is imported independent of a product (i.e. that is not being used to support, protect or carry another product in the shipment) must comply with the requirements for Products above.

Woolworths Supplier Excellence Programme: Paper, Pulp and Timber Code of Practice

All eligible suppliers of Woolworths Own Brand Paper Pulp and Timber Products must be audited to the Paper, Pulp and Timber Code of Practice as part of the Woolworths Supplier Excellence Audit. This serves as on-site verification of the supplier's ability to provide relevant and current information as well as trace legal products through the manufacturing process.

¹ Refer to relevant Woolworths Group Limited Fibre-based Packaging Supplier Guidance or Procedure for information on in-scope elements available in Supplier Portal or PartnerHub

Illegal Logging

All Regulated Timber Products imported into Australia by Woolworths Group Limited or associated business units, including Vendor branded products, must meet the due diligence requirements of **The Law**. Information on Regulated Products can be found on the Department of Agriculture's website.

Woolworths Group Limited will not intentionally, knowingly or recklessly import illegally logged timber or timber products into Australia or New Zealand. This means that if there is any reason to suspect that the timber used to produce a product was illegally logged, or if there is an identified risk that it was, Woolworths Group Limited will not procure it. Where a risk of Illegal Logging has been identified on existing supply, this may incur a cease trade until risk has been mitigated to low.

DNA and Isotope Testing (Australia Only)

In cases where further understanding of the raw material's origins is required, Woolworths Group Limited may ask for independent DNA and/or Isotope testing in order to support risk assessments for Illegal Logging. This is only allowable at the discretion of the Head of Sustainability or Chief Sustainability Officer for Supermarkets and the Head of Quality and Customer Care for BIG W.

Definitions

BIG W - should be read as including BIG W and by extension all in-scope products sold in BIG W.

Timber-sourced Cellulose/Viscose - Cellulose that has been derived from timber sources and not from Non-Timber Forest Products.

Consumer Packaging - all packaging products made of any material, or combination of materials, for the containment, protection, marketing or handling of consumer products. This also includes distribution packaging. (National Environment Protection (Used Packaging Materials) Measure, 2011).

Goods Not For Resale - Goods that are not sold, but rather purchased to support the operations of the company (e.g. paper towels for cleaning and paper straws provided in cafes).

High Conservation Value - Species, sites, and natural formations that are of considerable biological, ecological, social, or cultural significance.

Illegally Logged - Timber harvested in contravention of laws in force in the place (whether or not in Australia) where the timber was harvested.

Independently Certified/Independent Certification - Products and packaging sold by a certified supplier actively meeting the certification requirements for the Forest Stewardship Council (FSC) or a standard accepted under the Programme for Endorsement of Forestry Certification (PEFC).

Low Risk - Determined by gathering information and ascertaining beyond reasonable doubt that Illegally Logged timber is not contained in the product.

Own Brand - should be read as including all Own Brands and category brands/products where Woolworths Group Limited serves as the brand owner

Paper, pulp, timber product or packaging - includes any product or packaging containing material derived from timber forest-based materials including components. This includes solid wood, reconstituted wood such as MDF, wood fibre, pulp and paper products. It excludes products and packaging manufactured from non-timber forest products such as bark, cork, osier, vegetable parchment, rice, bamboo and rattan. It also excludes products that contain less than 5% Paper, Pulp, or Timber by weight .

Post-Consumer Recycled Content - Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain (AS Standard AS 14021-2018 S7.8.1.1).

Material is not considered post-consumer recycled material if the material is the by-product of a manufacturing process; it is considered post-consumer recycled material if:

- the material has been, or has been part of, another product; and
- at the time the material was removed from another product, that product was no longer used for its intended purpose and is considered to be waste; and
- the material has been used as raw material in the Paper Pulp and Timber product or packaging.

Pre-Consumer Recycled Content - Material diverted from the waste stream during a manufacturing process. Excluded is reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it. (AS 14021-2018 S7.8.1.1)

Primary Packaging - Packaging the consumer takes home with them that contains the individual product.

Recycled sources - Recycled fibre, verified in accordance with POL.075 and its associated procedure/s or through FSC/PEFC certification.

Regulated Timber Products - *Regulated timber products* are listed in Schedule 1 of the Illegal Logging Prohibition Regulation (2012) and fall under tariff chapters 44 (Wood and articles of wood), 47 (Pulp of wood or of

other fibrous cellulosic material; recovered (waste and scrap) paper or paperboard), 48 (Paper and paperboard; articles of paper pulp, of paper or of paperboard) and 94 (Furniture; prefabricated buildings). Materials such as bark, cork, osier, vegetable parchment, rice, bamboo and rattan are not considered timber and thus not regulated under the illegal logging laws. Products or packaging manufactured from 100% post-consumer recycled fibre are exempt from meeting the requirements for regulated timber products. The requirements for *regulated timber products* apply only in Australia for Own Brand,

Vendor/Supplier Branded, and Not for Resale (NFR) lines imported by Woolworths Group Limited.

Secondary Packaging - Packaging used to contain single or multiple primary packed products such as a shelf-ready tray

The Law - The *Illegal Logging Prohibition Act (2012) (Cth)* and the *Illegal Logging Prohibition Regulation 2012 (Cth)*

References and Resources

[Illegal Logging Prohibition Act \(Cwth\) \(2012\)](#)

[Illegal Logging Prohibition Regulation 2012](#)

[Department of Agriculture - Regulated Timber Products](#)

[Forest Stewardship Council \(FSC\) Chain of Custody Information Page](#)

[Programme for the Endorsement of Forest Certification \(PEFC\) Chain of Custody Information Page](#)