



# Piloting of Verification Procedures for Selected TLDS and Supply Chain Control

Report on Piloting Activities 2020/21 & 2022

Version 2.1

**Published by**

Deutsche Gesellschaft für  
Internationale Zusammenarbeit (GIZ) GmbH

Registered offices  
Bonn and Eschborn, Germany

**Protection and Sustainable use of Forest Ecosystems and Biodiversity (ProFEB)**

Saylom St, Saylom Village, Chanthabouly District,

Vientiane Capital, Lao PDR

T: +856 21 253 824

F: +856 21 253 263

<https://flegtlaos.com/>

**As at**

12 December 2022

**Design and layout (cover page)**

GIZ ProFEB / Peter Schwab

**Photo credits (Cover Page)**

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**Text**

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On behalf of the  
German Federal Ministry for Economic Cooperation and Development (BMZ)

# Table of Contents

Table of Contents.....	ii
List of Tables and Figures.....	iii
1 Background .....	1
2 Objectives of the Report .....	2
3 Piloting 1 (Nov 2020-Feb 2021) .....	2
3.1 Objectives .....	2
3.2 Concept.....	2
3.3 Methodology .....	3
3.3.1 Verification Objects .....	3
3.3.1.1 Plantation timber .....	3
3.3.1.2 Conversion timber .....	3
3.3.2 Verification Procedures .....	3
3.3.2.1 Plantation Timber .....	3
3.3.2.2 Conversion Timber.....	5
3.4 Implementation .....	6
3.5 Challenges and Lessons learned .....	7
3.5.1 Verification Procedures .....	7
3.5.1.1 Challenges.....	7
3.5.1.2 Lessons learned.....	7
3.5.2 Checklists .....	8
3.5.3 Applicability of Indicators/Verifiers .....	9
4 Further Development of Verification Procedures.....	10
4.1 Description of Verification Procedures .....	10
4.2 NSDC Agreements on Verification Procedures (April 2022) .....	11
5 Piloting 2 (June-July 2022) .....	12
5.1 Piloting Concept.....	12
5.2 Implementation .....	12
5.3 Lessons learned .....	13
5.3.1 Complementary function.....	13
5.3.2 Verification Procedures .....	15
5.3.3 Resources Verification Body .....	15
5.3.4 Supply Chain Control Confiscated Timber .....	18
5.3.5 Legal Framework Confiscated timber .....	20
5.3.6 Additional Lessons Learned .....	22
6 Recommendations .....	22
Annex A Itineraries Piloting Plantation Timber .....	1
Annex B Sample checklist for conversion areas .....	3
Annex C Implementation Schedule Piloting 1.....	4
Annex D Challenges encountered during verification missions .....	5
Annex E Applicability of indicators / verifiers TLD3, 7 and 8 .....	6
Annex F Overview of Supply Chain Records (as endorsed during NSDC in April 2022) .....	1

## List of Tables and Figures

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Table 1: Structure of plantation checklist (excerpt from list for the topic “Enterprise” at Burapha HQ) .....	4
Table 2: Workflow and piloting team composition.....	6
Table 3: Data structure Form 03 / log list (source: POFI ATT).....	18
Table 4: Possible data structure confiscated timber.....	19
Figure 1: Position of verification procedures in overall management system of verification body.....	1
Figure 2: Piloting concept .....	2
Figure 3: Excerpt from itinerary of Team A for Burapha company) .....	4
Figure 4: Step-by-step verification of timber from conversion areas (proposal at start of piloting 2021) .....	5
Figure 5: Verification approaches for different timber sources, wood processing and trade .....	10
Figure 6: Options for frequency, timing and intensity of verification missions and examples .....	11
Figure 7: Areas of responsibilities of operators, regulatory inspection organizations and verification bodies (left (forest) / below (wood processing and trade) .....	14
Figure 8: Verification procedures confiscated timber .....	15
Figure 9: Verification plantation timber producers, wood processors and traders.....	15
Figure 10: Model verification activities (Excel file) .....	17
Figure 11: Proposal traceability forms / timber moved to POFI compound .....	19
Figure 12: revised workflow for confiscated timber .....	20
Figure 13: Timber interception and confiscation (adapted from Smith (2018)) .....	21
Figure 14: Information Management System for Lao TLAS (adapted / further developed from IMS report, fig. 1).....	23



# 1 Background

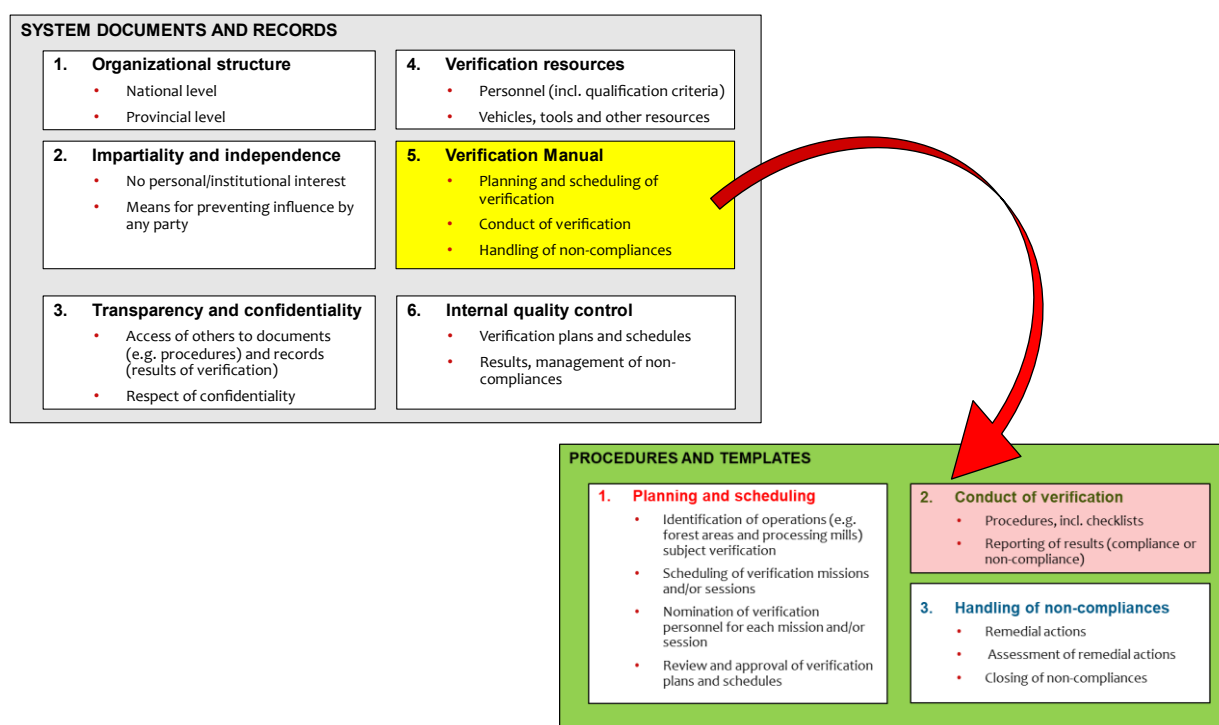
All Timber Legality Definitions (TLDs) have been set aside by Lao PDR and the EU during JEM4 in September 2020. By reaching this stage, the focus of the development of TLAS elements changed to the verification of legal compliance of timber, timber products and operators and their supply chain control. In JEM 4, the Lao government also agreed to draft, pilot and consult verification procedures for DOFI and POFI and to outline a scheme for the issuance of FLEGT licenses.

The piloting has been implemented in two exercises. The first exercise from late September 2020 until March 2021 (in this report referred to as “Piloting 1”) included a series of TWG and NSDC meetings on verification and licensing. Covid-19 restriction did not allow to implement all testing, originally planned in early September 2021. However, after further development of the verification procedures and their endorsement by NSDC and the review and extension of the Lao-EU VPA roadmap, a second exercise was added in June-July 2022 (“Piloting 2”) complementing activities from Piloting 1 by building up on experiences made. Piloting 2 has also been informed by development work after Piloting 1, especially the newly drafted Appendix A (verification matrix for TLDs) and Appendix B (supply chain control description and verification matrix).

Piloting 1 was implemented under the lead of FSO and with support of GIZ and an international consultant. The author was involved as GIZ staff / technical advisor. In piloting 2, the author has been in the role of a consultant, after termination of the staff contract.

The main objective of the piloting was to test verification procedures as part of a verification manual in the management system of the future verification body (see Figure 1). It should be noted that the piloting did not make statements about the compliance of visited operators from government or private sector with TLAS requirements (the verification subjects). Although the licensing scheme was part of the consultation under piloting 1, a testing of the agreed licensing scheme was not part of the piloting as the proposed scheme differs substantially from currently applied export procedures and could not be tested meaningfully under real-world conditions.

Figure 1: Position of verification procedures in overall management system of verification body



Source: GIZ/ProFEB

## 2 Objectives of the Report

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The report presents the implementation of two piloting exercises and the development steps in-between, discusses lessons learned and concludes with recommendations for the future implementation of the verification mandate of the verification body in the Lao TLAS. Piloting concepts, methodologies and field implementation are briefly summarized. Materials used during the piloting are for the first time compiled in a single document and enable the reader to get a comprehensive overview on the piloting and an easier access to materials in PowerPoint presentations or Excel files, produced for consultation and field implementation.

## 3 Piloting 1 (Nov 2020-Feb 2021)

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### 3.1 Objectives

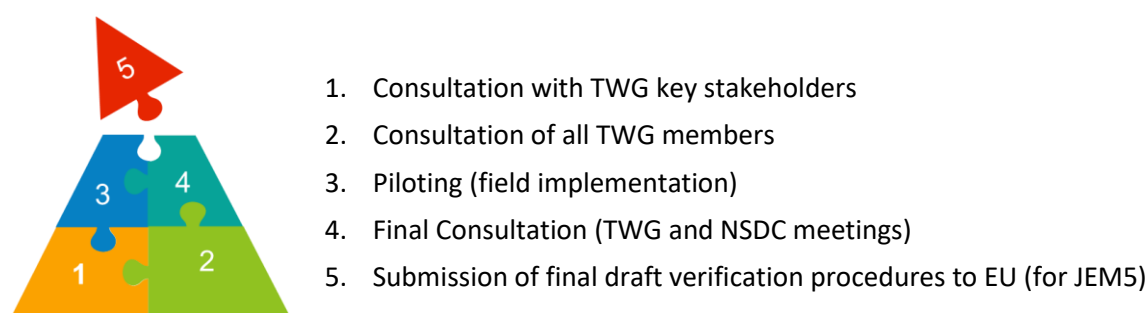
The main intention of the piloting of verification procedures was to allow the VPA stakeholders a better understanding how future verification will be implemented and what challenges may be expected. Additional objectives of the piloting were:

- It informs the negotiation between Laos and EU for a better implementation of TLAS
- It provides feedback to the future verification body on the function of verification procedures
- It gives feedback on suitability of indicator formulation, applicability of verifiers, frequency and timing for verification
- It supports testing of Draft Instruction for Export of Plantation Timber
- It provides a better understanding of synergies between the future verification function for wood processing and the inspection mandate of MOIC and line agencies under Decision 0777/MOIC 2020

### 3.2 Concept

Piloting 1 was combined with a TWG consultation on verification procedures and the FLEGT licensing scheme and planned as 5 steps (see Figure 2). Step 5 was eventually omitted due to the postponement of JEM5.

Figure 2: Piloting concept



Due to limited resource, the TWG selected the 2 most relevant timber sources, conversion areas and tree plantations, and their supply chains as verification objects, including therefore verification of compliance with TLD2, 7, 8 and TLD3, 7 and 8. Further selection criteria are described in the following methodology chapter.

### **3.3 Methodology**

#### **3.3.1 Verification Objects**

##### **3.3.1.1 Plantation timber**

Plantation timber has a growing significance for supply of raw materials to wood processing industries. Moreover, MOIC proposed that the piloting should inform the revision of the instruction on the export of plantation timber. DIMEX suggested to include companies with a potential to apply for simplified procedures for the export of plantation timber and wood products as the piloting of TLD3, 7 and 8 was linked to the testing of export procedures (according to an existing draft Instruction of DIMEX). For this reason, the piloting took place in Vientiane Province and Saravanh and not in the FLEGT piloting provinces Attapeu and Khammouane.

- Burapha: tree plantation concession with downstream wood processing (sawmill, plywood factory not yet operational) and advanced supply chain control (FSC certified) in Vientiane Capital (headquarters) and Vientiane Province (Sawmill in Nabong, Xaithany District). Verification subjects included DAFO and DOIC Xaithany and smallholder plantations in the district;
- Douangdy wood processing factory in Saravanh, Laognam District. Douangdy is processing timber from household plantations in the district and is exporting products.

##### **3.3.1.2 Conversion timber**

For conversion timber, the decision was taken to visit the conversion area at Nam Kong 3 (NK3) hydropower development project in Attapeu / Phouvong District. NK3 had already served as piloting area for OLDLM (Operational Logging and Degradation Monitoring System) activities and in August 2020, harvesting operations have tested supply chain control forms of the later issued Decision 0131/MAF (2020) on the management of supply chain control in conversion areas and production forests. However, as according to provincial forest authorities, timber sales and processing had not happened, and it was clear from the beginning that the verification mission would be limited to the concession approval process and logging operations, including OSH and supply chain control.

#### **3.3.2 Verification Procedures**

##### **3.3.2.1 Plantation Timber**

For the visits of Burapha and Douangdy, ProFEB prepared a customized, tentative itinerary based on available information on the companies and their timber suppliers and involving the responsible DAFO and DOIC offices. This proceeding has been leaned on practices used for auditing of voluntary certification schemes. The itinerary set out a provisional timetable for the test of verification and export procedures, defined the location of a certain activity for a particular verification topic, e.g. office, factory, field site, and the responsible personnel from the operator (see Figure 3). The piloting team was split in 2 Teams consisting of a team leader, members from the piloting team and representatives from province and district level:

- Team A - focus on legality, mainly composed by staff from DOFI and POFI),
- Team B - supply chain control and export procedures, mainly composed by staff from MOIC and POIC

The itinerary was discussed with the companies in an opening meeting and changes were made where necessary (e.g. suggestion to change location, different personnel proposed). At the end of the visit, the piloting teams presented a short summary of their findings to company representatives. The complete itineraries for the 2 verification missions on plantation timber are shown in Annex A.

Figure 3: Excerpt from itinerary of Team A for Burapha company)

Team A				
Date	Time	Location	Activity / Verification topics	Personnel Operator / Government Staff involved
03/02/2021	10:30-12:00	Head Office	<b>Concession:</b> ESIA/ESMMP, feasibility study, investment application, concession agreements <b>Registration:</b> Factory operation certificate, forest business registration, ESIA/EMMP factory	Ly
03/02/2021	12:00-13:00	nearby restaurant	Lunch	
03/02/2021	13:00-14:30	Head Office	<b>Finance:</b> tax obligations, salary payments, social security.	Dominique
03/02/2021	14:30-15:00	Head Office	<b>HR</b> (employment contracts)	Dominique
04/02/2021	07:30-8:30	n/a	Travel to Nabong (discuss logistics during briefing meeting of piloting team)	
04/02/2021	08:30-09:30	Nabong Factory	<b>Work safety</b> (OSH guidelines PPE, trainings)	Jerome
04/02/2021	09:30-12:00	Field visit at sample plantations	Validate harvesting	

For both verification missions, a set of checklists was prepared for the teams and structured by topics and locations of field work and not by TLDs (rationale see next chap.). Identified topics were:

- Tree plantation concessions
- Tree plantation registration (at companies and DAFO)
- Finance
- HR
- Work safety
- Timber supplies and input-output monitoring (at companies and DOIC)

As DIMEX wanted to assess the readiness of the companies to fulfil requirements for simplified export procedures, an additional column marked those indicators from TLD3, draft v6.0, reflecting requirements from the draft instruction. Requirements and related verifiers with regard to input-output monitoring and reporting according to 0777 were ticked off to understand verification of supply chain control. The remark field allowed participants to take note of the status of a certain verifier or to comment its applicability for verification.

Table 1: Structure of plantation checklist (excerpt from list for the topic “Enterprise” at Burapha HQ)

Team A: Enterprise / Burapha Headquarter								
Indicator No	Indicator Text	Verifier No	Verifier Text	Draft Export	0777	C	NC	Remarks
3.4.2.2	The exporter is a registered enterprise with a valid business license and a regular tax record.	3.4.2.2.1	Enterprise registration license	x				

C: compliant with indicator, NC: non-compliant



The following graph summarized the verification procedures:



1. Verification Itinerary
2. Checklists according to itinerary
  - Visited sites / locations / resource persons
  - Checklists for verification topics

Verification subjects: 3 main categories

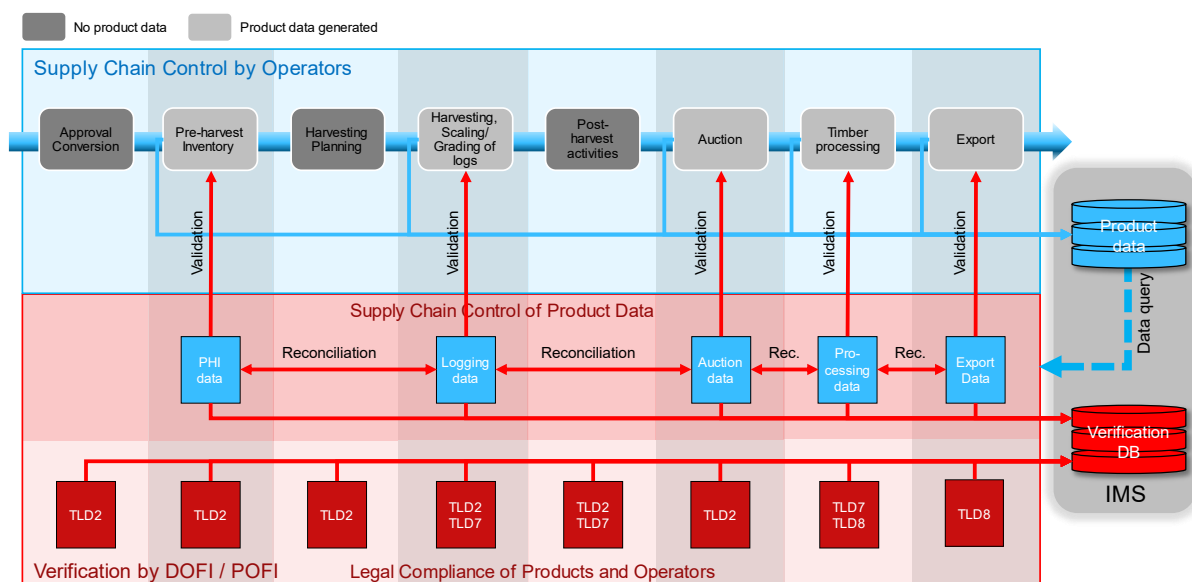
- Wood Processing Companies
- Plantation Registration / Reporting to DAFO
- Plantations: Households (sampling), concessions

### 3.3.2.2 Conversion Timber

For conversion timber, the international TLAS consultant suggested to carry out verification of compliance with the relevant indicators of the TLDs and validation of data on trees, logs and timber products at each stage of the supply chain (Draft Verification Manual 1.3, Oct. 2020). This approach has been visualized and labeled at the start of piloting as “step-by-step approach” (see Figure 4 below).

Verification and data validation at different stages of the supply chain at an appropriate time provides up-to-date compliance information and ensures that the next stage of the operations can only be implemented if no non-compliance is recorded, or remedial action has been implemented. This is an important aspect for the verification of conversion areas, considering the weak implementation of legal requirements and supply chain control in the past.

Figure 4: Step-by-step verification of timber from conversion areas (proposal at start of piloting 2021)



The proposed checklists combined indicators from TLD2, 7 & 8 as it is cost-effective to verify for instance compliance of operators with the relevant labor obligations or OSH when harvesting operations are visited rather than during a separate verification mission.

Each of the above stages has its own set of checklists, covering both assessment of compliance with the relevant indicators of the TLD, and qualitative and quantitative validation of timber products in the supply chain (see Annex B for a sample checklist of the step “Pre-harvest inventory”). Contrary to checklists for plantation

timber, a field with verification guidance has been added to the checklists, taking into account the higher complexity of operations, compared to plantation timber.

Qualitative and quantitative reconciliation of timber products requires no field verification and have not been tested; the compliance will systematically be carried out based on operational control data uploaded into the planned information management system by the operator and/or the relevant regulatory inspection agency.

### 3.4 Implementation

A piloting team, initially composed by a head of Division and a technical staff from DOFI (Forest Inspection Division, Investigation-Interrogation Division), DIMEX and DOIH, held an inception meeting and agreed on the piloting workflow (see Table 2), activities and the timeline for implementation. Each verification mission started with a briefing meeting of the piloting team, followed by the verification exercise in the proper sense and a debriefing meeting of the piloting team with the objective to summarize results and draw conclusions on behalf of the TWG for their final consultation (step 4).

Table 2: Workflow and piloting team composition

Plantation Timber (Burapha / Vientiane Capital; Douangdy / Salavan)		
<ul style="list-style-type: none"> <li>• 1 day</li> <li>• Piloting team (DIMEX, DOIH, DOFI, DOF)*</li> <li>• GIZ advisors</li> </ul>	<ul style="list-style-type: none"> <li>• 2 days</li> <li>• Piloting team <ul style="list-style-type: none"> <li>• Team A: Focus on legality</li> <li>• Team B: Focus on supply chain control and export procedures</li> </ul> </li> <li>• GIZ advisors</li> <li>• Company management &amp; staff</li> <li>• DAFO (district with tree plantation sites)</li> <li>• DOIC (reporting of companies)</li> </ul>	<ul style="list-style-type: none"> <li>• ½ day</li> <li>• Piloting Team</li> <li>• GIZ advisors</li> </ul>
Conversion Timber (Nam Kong 3 Conversion Area)		
<ul style="list-style-type: none"> <li>• 1 day</li> <li>• Piloting Team (without Industry and Commerce sector)</li> <li>• at POFI Attapeu</li> </ul>	<ul style="list-style-type: none"> <li>• 2-3 days</li> <li>• Piloting team</li> <li>• GIZ advisors</li> <li>• PFS Attapeu / DFU Phouvong</li> <li>• Forest sites in NK3</li> </ul>	<ul style="list-style-type: none"> <li>• ½ day</li> <li>• Piloting Team</li> <li>• GIZ advisors</li> <li>• at POFI Attapeu</li> </ul>

\*during inception meeting, participants decided to involve also provincial and district level in the piloting, including briefing and debriefing meetings

Piloting 1 has been implemented from October 2020 to March 2021. The actual field implementation happened in January-February 2021. Due to changes in the availability of involved government staff and divergent conditions found onsite, some activities had to be adapted. The most important adaptations were:

- No harvesting took place during verification missions for plantation timber. Legal compliance could not be verified and harvesting data not be validated at field sites;
- At NK3, only LL2 was visited as harvesting operations were already completed and no harvesting contractors could be interviewed. The Piloting was implemented at the meeting room of POFI Attapeu and LL2 Nam Kong 3 and only in presence of PFS and DFU Phouvong.

Details regarding the implementation of activities, including a short description of occurred deviations is attached in Annex C.

## 3.5 Challenges and Lessons learned

In the debriefing meetings of each verification mission, members of the piloting team presented and discussed the results of the mission with a focus on:

- a) the verification procedures, particularly the suitability of selected verification locations and the frequency and intensity of verification missions
- b) the applicability of indicators and verifiers of the TLDs for verification, including the availability of documents

The findings of all 3 verification missions were compiled after the completion of the field implementation and presented by a team member during the consultation of the TWG in step 4 and brought forward to the following NSDC meeting.

### 3.5.1 Verification Procedures

As part of a reality check for the verification procedures, the main challenges encountered during the missions were summarized. These challenges reflected indirectly the status of the implementation of TLAS requirements at the time of the piloting.

#### 3.5.1.1 Challenges

Main challenges identified during verification missions for plantation timber were:

- Availability of documents for legal compliance may be critical if management systems of visited companies are not well developed and/or companies are not prepared for the verification mission;
- Reporting to DAFO before cutting and before transport (as required by Law 64/MAF (2019) Art. 36 and Decree 247/GOV (2019) Art. 7) was not yet applied;
- Verification of supply chain control and tracing back timber to household plantations was not possible within the limited time available. Moreover, input-output reports according to 0777 did not yet exist and export was still under responsibility of POIC;
- Requirements from TLD3 and 7 on harvesting could not be checked as no harvesting took place;
- Both visited companies had no labor inspection in the past and all indicators with the verifier “Inspection report from labor inspection organization” under TLD3 could not be checked.

The mission to Attapeu /NK3) demonstrated that documents for infrastructure development projects under responsibility of the central level are not necessarily available at the provincial level, especially verifiers on the approval of the conversion. It was also not a surprise that some steps could not be concretely verified as there were no ongoing operations.

An overview of all challenges documented during the debriefing meetings can be found in Annex D.

#### 3.5.1.2 Lessons learned

The piloting team summarized the lessons learned regarding timing and frequency of verification missions for plantation timber as follows:

- Regular verification of wood processing companies seems a good approach, but regulatory inspections by industry and commerce sector <sup>1</sup>according to 0777 should be used as data / information source and replace site visits. Yet, sample visits for verification of supply chain control by verification body may be an option.

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<sup>1</sup> with the new mandates of MAF and MOIC, regulatory inspections are implemented by DOF and local line agencies; yet complementarity between regulatory inspections and verification by DOFI and line agencies is still under discussion

- Regular visits by verification teams (POFI, DFIU) at DAFOs to check plantation registration system with a sampling approach and visit of a sample of plantations are recommended, but it needs to be taken into account that plantations are also registered at village or provincial level, according to their size.

Beside these main principles, future verification procedures will have to define further details, e.g. how regularly are companies or DAFO visited, determined on a risk based approach? What will be the sample size of visited plantations? How to deal with suppliers from other districts or even other provinces? These details will depend on the availability and the degree of implementation of information management systems, among others:

- IMS with data / information on legal compliance and product data
- National Plantation Registration System (under construction) based on new Instruction 2492/MAF On the National Registry of the Plantation Forests and Certified Planted Trees
- Input-Output Monitoring data base of Industry and Commerce sector (under construction)
- Labour Inspection online report system

For conversion timber, the piloting team noted the following lessons learned:

- Step-by-step approach has been understood by piloting team and PFS/DFU and assessed as being appropriate
- Timing and Intensity of verification missions for each step have been assessed as being appropriate
- Coordination between Verification Body and Operators (DOF/PFS and harvesting enterprises) is important for timing. Next step should not be started if non-compliances exist / remedial action is taken
- DOFI and POFI have to coordinate the annual planning (i.e. what needs to be verified at central level needs to be included in the DOFI annual working plan)

The field testing did not include reflection on the needed resources for the implementation of verification procedures. This has been undertaken during piloting 2 (see chap. 5.3.3).

### **3.5.2 Checklists**

Checklist have been evaluated as being appropriate in terms of structure and content:

- for plantation timber: based on verification sites / locations / involved organizations/units and linked to an itinerary, defined by the criteria organization, activities, facilities, timber supplier structure and products of verified units;
- for conversion timber: based on step-by-step verification according to supply chain. Checklists for step 4 (harvesting, scaling and grading) and 5 (post-harvesting activities) should be combined as indicators/verifiers are identical.

The verification guidance for each indicator, included in the checklists for conversion timber has been judged as being very helpful by the piloting teams and they recommended to include it in checklists for other timber sources, OSH and wood processing.

### Excursus: Checklists

Checklists are the key tool for the teams implementing verification missions. The checklists translate the legal requirements and verifiers as displayed in the TLDs and the description of supply chain control in Appendices B in an applicable working document. They are structured according to the logic of site or field visits:

- by steps (for PFAs and conversion areas)
- by location and activities/verification topics as planned in a verification itinerary (all other sources and wood processing, verification by subjects)

Checklists can include verification guidance (as used in the piloting checklist for conversion areas in piloting 1). The participants of the piloting exercises found this helpful and suggested to include the guidance in all checklists. This will be particularly important for the checklists on supply chain control. Yet, it is suggested to establish separate technical guidelines for more complex measurements and the definition of sampling strategies.

The result of the verification is documented in the checklists (compliance / non-compliance with a requirement) and can be transferred to the verification module of the IMS after the mission is completed. Hardcopies could in the future be replaced by electronic, web-based forms which would directly communicate with the IMS.

It is recommended to establish checklist templates for prototypical verification steps/topics as part of the verification manual, yet to adapt these templates according to a specific verification subject by best reflecting the real situation and adjust the checklists gradually after each visit.

### 3.5.3 Applicability of Indicators/Verifiers

The formulation of indicators and selection of verifiers in TLD2, 3, 7 and 8 was in general assessed as being applicable for verification. Exceptions were:

- TLD2:
  - o Checklist 1 (Approval of investment projects and forest conversion) needs to be adapted for each project according to project type (under Investment Promotion Law, under State Investment Law) and project scale (responsibilities at central or provincial level).
  - o For the availability of verifiers, clarification is needed on roles of agriculture and forestry sector and environment and natural resources sectors in the implementation and monitoring of resettlement / compensation
  - o Assess for each project if implementation of resettlement / compensation plan is still ongoing during harvesting operation (checklist 4). If not, verifiers are not relevant anymore.
- TLD3:
  - o Indicators / Verifiers on export of logs (criterion 3.4.2) were defined by a version of Draft Instruction from January 2020, already revised, and will have to be revised
  - o For consistency of TLDs, export of logs (round wood, allowed by MOIC product list) should be integrated in TLD8, principle 8.2 (Requirements and procedures for export)
- TLD7
  - o No evidence could be found during piloting for the verifier "Inspection Report from Labor Inspection Organization" used for all indicators of TLD7. Proposal to change indicators / verifiers to requirements of operators (not state organization with inspection mandate)
- TLD8:
  - o All indicators/verifiers related to 0777 need to be revised
  - o Indicators for "Environmental obligations" (criterion 8.3.1): structure should be adapted to TLD2

A more detailed list at indicator/verifier level is available in Annex E.

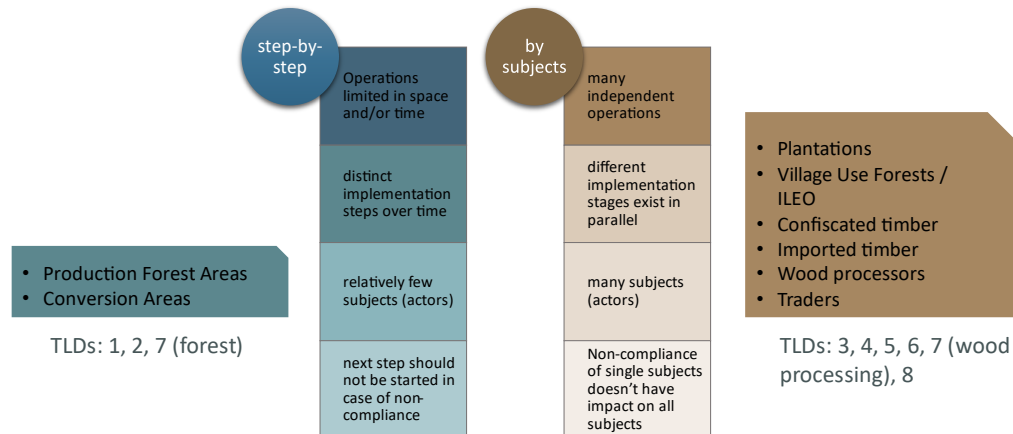


## 4 Further Development of Verification Procedures

### 4.1 Description of Verification Procedures

Experiences from piloting 1 were analyzed and used to systematically describe verification procedures by shaping 2 approaches, based on the characteristics of operations and operators. This is depicted in the following graph:

Figure 5: Verification approaches for different timber sources, wood processing and trade



Verification in PFAs and Conversion Areas will be implemented step-by-step as piloted in NK3 / Attapeu. For the other sources and the cross-cutting issues labor obligations, wood processing and trade, all subjects involved in a certain supply chain need to be mapped and verification procedures designed according to these actors networks and sampling strategies, based on a risk approach, will be applied. After identification of the 2 approaches, options for frequency, timing and intensity of verification missions have been elaborated (see Figure 6 below) and eventually selected for each indicator of the TLDs. The result has been described in 2 Appendices to the TLAS Annex: Appendix A (verification of compliance with TLDs) and Appendix B (description of supply chain control and its verification).

- Appendix A combines the principles, criteria and indicators of the TLDs with a description of the verification procedures for the verification body, including responsible level (central/provincial), verification means and frequency/timing and intensity of verification missions, or in other words, who is verifying what, when and how often. During the drafting of Appendix A, indicators and/or verifiers of some TLDs have been reviewed based on the suggestions from piloting 1. Appendices A1-A7 have been drafted (transferring TLD1-7) and agreed on by the stakeholders. The appendix for wood processing and trade (A8) remained an initial draft and consultation has been deferred to await the outcome of the regulation under MAF, replacing 0777.
- Appendix B is divided in 2 parts and describes 1) operational control for critical control points at different sites, including necessary supply chain records and responsible operators and 2) validation and reconciliation of supply chain control by the verification body, including procedures.

Figure 6: Options for frequency, timing and intensity of verification missions and examples

Frequency	Timing (event, action)	Intensity
<ul style="list-style-type: none"> <li>• onetime check</li> <li>• case-by-case basis</li> <li>• once per year</li> <li>• biannually</li> <li>• several times per year</li> </ul>	<ul style="list-style-type: none"> <li>• before</li> <li>• during</li> <li>• after</li> <li>• open / not relevant</li> </ul>	<ul style="list-style-type: none"> <li>• comprehensive</li> <li>• sample of subjects</li> </ul>
Examples		
<ul style="list-style-type: none"> <li>• <b>Onetime check:</b> concession agreements, management plans</li> <li>• <b>case-by-case basis:</b> conflict resolution PFA</li> <li>• <b>once per year:</b> harvesting plans</li> <li>• <b>biannually:</b> confiscation by POFI</li> <li>• <b>several times per year (risk-based*):</b> field visits to conversion areas during harvesting</li> </ul>	<ul style="list-style-type: none"> <li>• <b>before</b> annual operation plan is established</li> <li>• <b>during</b> harvesting</li> <li>• <b>after</b> auctioned timber has been cancelled from state assets registry</li> <li>• <b>open / not relevant:</b> holding and handing over of confiscated timber</li> </ul>	<ul style="list-style-type: none"> <li>• <b>comprehensive</b> <ul style="list-style-type: none"> <li>• all conversion areas</li> <li>• all plantation concessions</li> <li>• all wood processors</li> </ul> </li> <li>• <b>sample of subjects (risk-based*)</b> <ul style="list-style-type: none"> <li>• sample of harvesting compartments in PFAs</li> <li>• sample of smallholder plantations</li> </ul> </li> </ul>

\*will be defined in a verification manual

Both appendices were discussed and improved by TWG in meetings in January and February 2022, taking into account conclusions from piloting 1, and presented to the NSDC during a 2-day meeting from April 07-08, 2022.

Together with Appendix A indicators and legal references of TLDs have been amended where necessary. For A3 (Plantations), the TWG suggested to move export procedures (indicators 3.4.2.2 – 3.4.2.4) to TLD 8, separating by plantation and natural timber. In A7 (Labor obligations), respectively TLD2, all verifiers were changed to verifiers produced by the operators and reflecting the indicator. They replaced the former verifier “Inspection Report from Labor Inspection Organization”. As mandates of MAF and MOIC were still unclear A8 (wood processing and trade) has not yet been established.

The Appendices B does not include the data structure of the supply chain records. The structure depends on origin, product information and product specification, yet is similar for different sources and product categories. It will not be included in each Appendix but displayed in an overview table for all sources, processing and trade (see Annex F).

## 4.2 NSDC Agreements on Verification Procedures (April 2022)

The NSDC meeting in early April discussed and agreed on contents of several VPA annexes including the verification of legality and supply chain control in the TLAS Annex (Annex II). The following agreements have been documented in minutes<sup>2</sup>:

- The NSDC agreed and endorsed the structure of Appendix A.
- The NSDC agreed that the TWG and advisor teams need to improve the structure of Appendix B by merging all SCCs to one document (one table that can be used for all SCCs of all TLDs ).

During the meeting, the NSDC reconfirmed and insisted that DOFI and POFIs will become the verification bodies and agreed to develop an intersectoral information management system (IMS). Both points are fundamental prerequisite for the verification function in the TLAS.

In a part of his presentation<sup>3</sup>, the head of FSO summarized open issues regarding the new mandates of MAF and MOIC and listed open points regarding legal compliance and supply chain control for each timber source and cross-cutting issues, including necessary legal amendments, unclear procedures and open technical questions. The NSDC meeting proposed to all concerned sectors taking timely action on their respective regulations. Details of the respective regulations, responsibilities and proposed solutions are summarized in an appendix to the MoM.

<sup>2</sup> MoM of NSDC from 09.05.2022

<sup>3</sup> [Presentation on Annex II in NSDC 04/2022](#)

The NSDC also agreed to continue piloting of the verification procedures by utilizing the procedures described in the draft appendices. Planning of the piloting 2 was launched in early May, after COVID-19 measures were completely lifted and field visits became again possible without limitations.

## 5 Piloting 2 (June-July 2022)

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### 5.1 Piloting Concept

Procedures for the verification of TLD2 have been described robustly (step-by-step approach) and were well understood by the future verification body. Thus, it has been decided that another piloting round may not be necessary in view of the limited timeframe for the piloting. Testing of verification of timber from Village Use Forest (VUF) or from land of individuals, legal entities or organizations (ILEO) was deemed to be unrealistic due to the still missing legal framework and unpreparedness of actors in the field. The decision was eventually taken to pilot again TLD3, 7 & 8 and put a second focus on TLD5 (supply chain control and verification of confiscated timber).

The piloting was separated into a 3-day TWG workshop regarding verification and regulatory inspection at central level and a field testing of draft verification procedures for a) confiscated timber and b) for other timber sources (focus on timber from plantations), processing and trade. Khammouane was suggested to host the field testing as Attapeu had been involved in the first piloting exercise and limited resources of government staff and the timeline did not allow to implement activities in both provinces. More details on the concept can be found in a separate document, established during the preparation of piloting 2<sup>4</sup>.

During the debriefing meeting in Khammouane, the Head of FSO suggested to organize a meeting between forest authorities, namely the investigation-interrogation division from DOFI, and the Ministry of Justice to seek advice on the interpretation of 64/NA (2019), art. 141 as a preparatory step for a revision of TLD5. As an input, the consultant reviewed again a report on the legal framework of confiscated timber, produced in 2018<sup>5</sup>. The findings of this report have been used to inform the drafting of TLD5. The report referred to key laws only available as draft (37/NA (2017) Criminal Procedures Law; 26/NA (2017 Penal Code) at the time of the writing of the report or used laws which have been amended after completion of the report (64/NA (2019) Forestry Law; 81/NA (2020) Customs Law). In the review, unclear points have been commented and structured according to the workflow described in TLD5. Instead of the initially proposed meeting with MOJ, ProFEB suggested a TWG meeting with all investigation-interrogation authorities to clarify inconsistencies in the legal framework on confiscated timber roles and responsibilities of investigation-interrogation authorities. The TWG meeting was implemented during 2 days in Thalath.

### 5.2 Implementation

The TWG meeting was implemented in Vang Vieng from June 8-10, 2022. During the first day, complementary function of regulatory inspection and verification and the roles and responsibilities of government bodies were discussed in the plenum. Based on two graphs (see Figure 7), suggesting areas of responsibilities of operators, regulatory inspection organizations and verification body, main issues for clarification were identified and options discussed. On the second day, participants estimated the number of working days per year for verification activities in a virtual province by applying a simple Excel model, based on the draft verification procedures. On the last day of the meeting, a draft concept for an information management system under the Lao TLAS was discussed, along with the necessary data sharing mechanisms between operators, regulatory inspection bodies, verification bodies and the licensing authority.

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<sup>4</sup> Piloting Concept (draft v2.1 - 16/05/2022 )

<sup>5</sup> Smith, H.: Legality of Confiscated Timber in Lao PDR: A Timber Legality Definition of Confiscated Timber in the Framework of the FLEGT VPA Process in Laos, with supporting information. GIZ, 2018 (unpublished). Commented version by consultant, see [here](#)

Field testing was leaned on the experiences gained in piloting 1 and itineraries and checklists have been prepared based on selected verification subjects, proposed and invited by POFI Khammouane:

For plantation timber, processing and trade, subjects included:

- Plantation concession with downstream processing of plantation timber: Mekong Timber Plantations;
- Wood processing factory: Visith Company (a furniture company which also processes confiscated timber);
- DOIC and DAFO Hinboun district (as both companies were located in this district).

The itinerary included a joint inception meeting of half-a-day for all participants with the objective to present the draft verification procedures and discuss the itinerary, visits at DAFO /DOIC Hinboun in the afternoon and onsite visits of offices, facilities and plantations at the companies at the second day.

The testing of verification procedures for confiscated timber foresaw an inception meeting of half-a-day with the verification body and operators in the supply chain from holding to processing and a field testing of verification procedures at a site with hold or seized timber and POFI's warehouse in the second half of the day.

Invited to the inception meeting were:

- law enforcement authorities who can hold and seize timber (Police, Military, Customs, anti-corruption authority);
- auction: POIC and DSA;
- wood processing factory (Visith)

The implementation of the piloting in Khammouane took place with some deviations from the tentative agenda:

- due to a meeting of POFI Khammouane, convened by the Governor on short notice, the piloting of confiscated timber had to be limited to a consultation meeting in the afternoon of the first day and no field visit at a point of holding or seizure of a law enforcement authority and at the warehouse of POFI was possible.
- The initially planned TWG meeting of half-a-day with key members from DOFI, DOF and DIMEX has been cancelled due to unavailability of staff
- The debriefing meeting was held on Saturday morning, June 25, 2022 instead of a full day on Tuesday of the following week.

## **5.3 Lessons learned**

### **5.3.1 Complementary function**

Operators occupy a central position in the system of timber production, processing and trade. They are responsible to comply with legal requirements, need to implement supply chain control and store supply chain control data (ideally in the future in the IMS) and have reporting duties towards authorities (see Figure 7).

On the forest side, operators can be public or private entities. In the case of VUF, both ownership categories may be involved, even in a mixed setting, e.g. the Agriculture and Forestry Sub-Unit under the Village Economic and Financial Unit (Law 64/MAF (2019) Art. 148) is responsible for managing, yet operations are under a producer group, as foreseen in the model "Commercial Wood Production from Natural Forests" in the KfW Village Forest Management Project. Beside operators, harvesting contractors (responsible for the implementation of OSH and labour obligation requirements in TLD7) and project developers (responsible to comply with legal requirements regarding project development in principle 1 of TLD2, have been added.

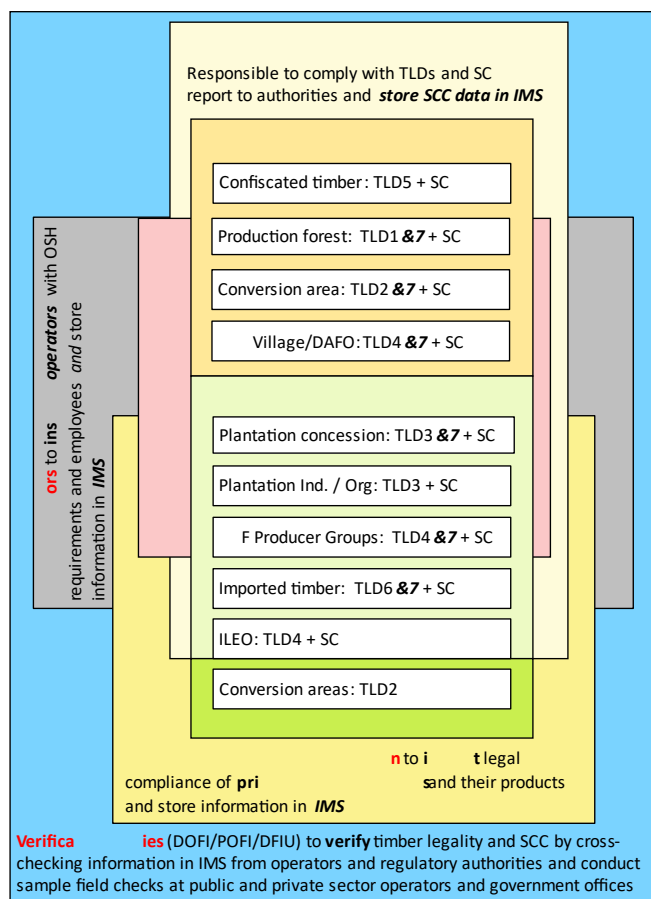
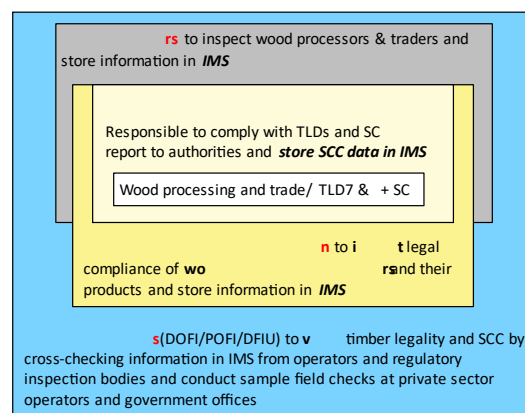


Figure 7: Areas of responsibilities of operators, regulatory inspection organizations and verification bodies (left (forest) / below (wood processing and trade))



Asked about current practice of regulatory inspection organizations at central, provincial and district level, government stakeholders could not draw a clear picture of a systematic approach. Private sector representatives indicated that inspection and controls from different organizations are often overlapping and inefficient, for instance for exports, causing an unnecessary burden for companies.

The following options for clarification have been discussed by the TWG:

1. Mandates of DOF/DOFI for inspection and verification of timber production
  - a) DOF/PFS/DFU and line agencies are monitoring private sector timber producers. PFA, conversion areas are verified by DOFI/POFI/DFIU (step-by-step approach) as DOF and line agencies are involved in operations. Confiscated timber is verified by DOFI as POFI is the operator.
  - b) DOF inspects PFAs and conversion areas as not being directly involved in operations.
2. Mandates of DOF/DOFI and line agencies for inspection and verification of wood processing (assuming that MOIC is not responsible anymore)
  - a) DOF/PFS/DFU is inspecting the wood processing sector
  - b) DOFI/POFI/DFIU is verifying the wood processing sector, DOF/PFS/DFU is responsible to develop and amend legal framework and for management of wood processors and traders

TWG members were prone to favor option 1. a) and option 2. b), including provincial representatives. This means that they agree that DOF and local line agencies are not involved in inspection work which is under the only responsibility of DOFI and line agencies as it is their mandate by the Forestry Law. Ultimately it means that systematic inspection could be integrated into the verification function of the Lao TLAS.



### 5.3.2 Verification Procedures

Verification procedures for confiscated timber and plantation timber were presented during TWG meeting and the two inception meetings for the field testing and in general agreed on by stakeholders. They are summarized in the following two graphs:

Figure 8: Verification procedures confiscated timber

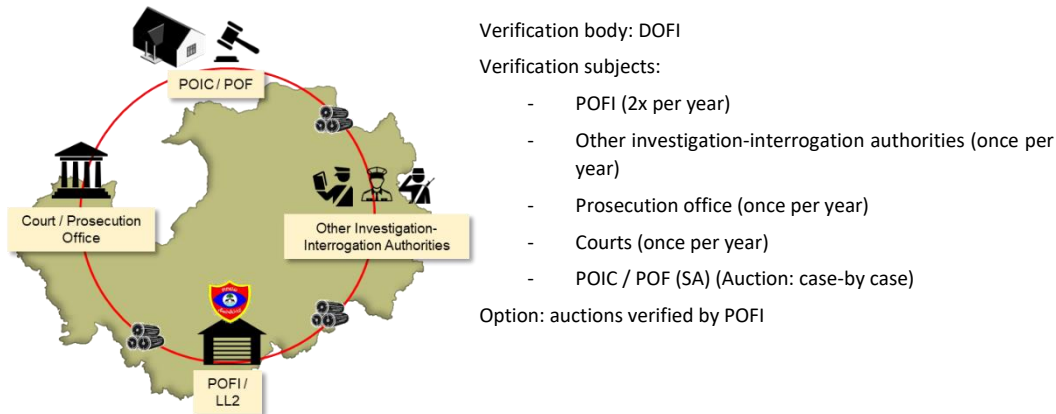
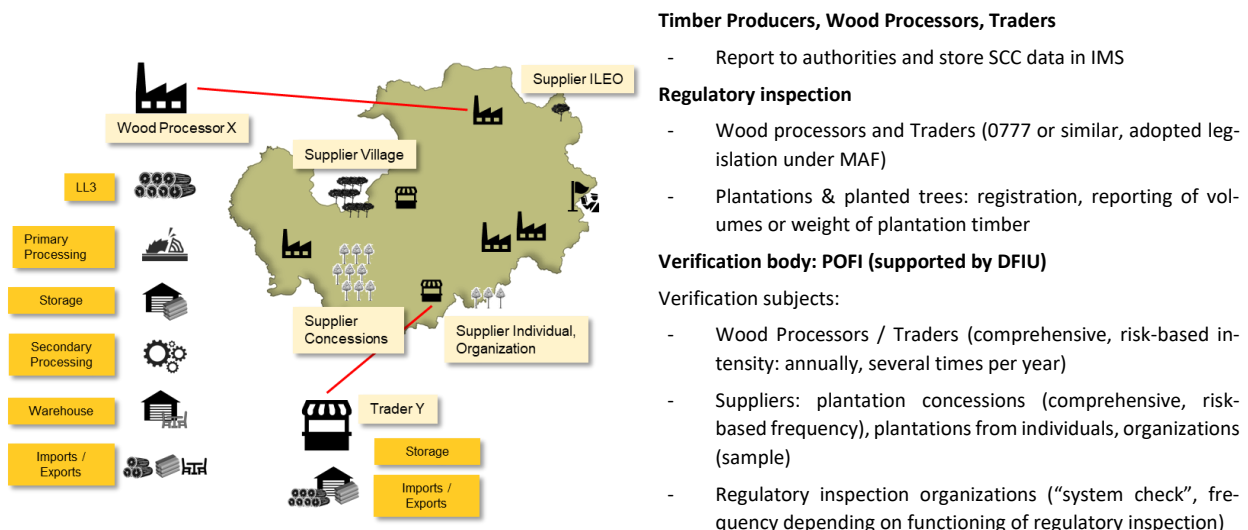


Figure 9: Verification plantation timber producers, wood processors and traders



### 5.3.3 Resources Verification Body

The development and consultation of the verification element in the TLAS has focused on organizational and technical aspects, including more recently the embedding of verification within existing inspection of government authorities as a complementary function. However, resource needs to build up and run a systematic verification system have hardly been discussed. In their review of the Draft TLAS Annex (v5.0, 11/2019) from April 2021, EU raised the question about capacities and resources of POFI to perform the role as verification body. For this purpose, the international consultant developed a simple model, based on verification procedures allowing the modelling of the number of working days per year and province (see Figure 10 and annexed as digital file).

In two dashboards, model parameters for a virtual provinces can be selected (fields in red script) and assumptions made for sample rates of verification subjects, necessary follow up visits to check remedial actions in case of detected non-compliances (as a percentage of sites visited) and the intensity of visits for Wood processors and traders with high, medium or low risk (fields in blue script). The number of verification days, sampling rates and duration of follow-up visits are then calculated based on verification procedures recorded in separate sheets, i.e. frequency, timing and intensity, as described in the respective Appendix A. The duration of site visits can also be altered.

Figure 10: Model verification activities (Excel file)

Production Forest

No. of FMA

5

Sample size FMA

100%

Annual harvesting compartments

15

Sample size harvesting compartments

30%

Missions during harvesting

3

Auction events

2

PFA villages with harvesting

15

Sample size visited villages

25%

Conflict cases

5

Conversion Area

Investment project

1

Conversion site or annual portion

2

Missions during harvesting

4

Auction events

2

Confiscated Timber

Auction event (s)

2

Verification Days

Number of visited Samples

Follow up Remedial Actions

Timber Source

Production Forest

81.5

Conversion Area

29

Confiscated timber (DOFI)

7.5

Total [days]

118

Type

Harvesting compartments

15

5

Conversion sites

2

2

Total

17

7

41%

Assumptions

% of subjects with remedial actions

20%

Duration of follow up (day)

1

Total Duration Follow up [days]

2

Instruction

Dashboard I

PFA

CA

ConfIT

Dashboard II

Plant\_VuF\_ILEO

WP&T

RegInspecChecks

+

Criteria Selection Plantations, timber from VUF and from Land of ILEO

Private Sector Timber Producers

New concessions

1

Sample size new concessions

100%

Existing concessions

3

Sample size existing concessions

33%

Supplier ind., org. (plantation timber)

50

Sample size supplier ind., org.

10%

Supplier Villages (natural timber)

4

Sample size supplier villages

50%

Supplier ILEO (natural timber)

40

Sample size ILEO

10%

Wood Processors & Traders

Large WPF

1

0

0

1

Comprehensive

100%

Medium WPF

17

5

5

7

Comprehensive

100%

Small WPF

17

5

5

7

Sample size small WPF

50%

Family-based WPF

8

5

2

1

Sample size family-based WPF

50%

Trader

4

0

4

0

Comprehensive

100%

Risk Matrix

High risk

quarterly

Medium risk

bi-annually

Low risk

annually

Sampling Plantation and ILEO Registration

Districts

8

Villages

466

Sample size villages

5%

Reg. plantation or planted trees

400

Sample reg. plantations / planted trees

2%

Certificates ILEO

300

Sample of certified ILEO

2%

Verification Days

No. samples of Private Sector Timber Producers

Follow up Remedial Actions

Timber Source

Plantation Concessions

2.5

Plantation Individuals, Organizations

5

Village use forest

3

ILEO

1

Subtotal [days]

11.5

Wood Processors, Traders, Suppliers

Wood Processors, Traders, Suppliers

91.5

Subtotal [days]

91.5

Regulatory Inspection Sampling

Regulatory Inspection Sampling

31

Subtotal [days]

31

Total [days]

134

Type

New concessions

1

1

Existing concessions

3

1

Supplier ind., org. (plantations)

50

5

Supplier Villages (natural timber)

4

2

Supplier ILEO (natural timber)

40

4

Total

98

13

13%

Assumptions

% of subjects with remedial actions (wood processors)

20%

% of subjects with remedial actions (timber producers)

20%

Duration of follow up (day)

1

Total Duration Follow up

12

Instruction

Dashboard I

PFA

CA

ConfIT

Dashboard II

Plant\_VuF\_ILEO

WP&T

RegInspecChecks

+

Figure 10 demonstrates the calculation of a scenario for a virtual province with selected parameters (fields in blue script). Verification days have been calculated at 118 days and 2 days for follow-up visits (dashboard I), respectively 134 days and 12 days (dashboard II). This sums up to totally 266 days. It should be noted that 7.5 days are covered by DOFI activities for the verification of confiscated timber, thus 258.5 verification days would fall on the POFI with support from respective DFIU staff. The scenario represents an average province with regards to verification subjects (average number of districts and villages, assumptions for PFAs, no. of wood processing companies in different classes, etc.) with moderate sampling rates, assuming that regulatory inspection is working well and verification missions can be reduced to a minimum. In a scenario with a weak implementation of regulatory inspections, the intensity of verification missions would have to be increased which would lead to more annual verification days. As an example, if only the frequency of visits of wood processors and traders with a high risk is increased from quarterly to monthly visits, the total of verification days increases 100 working days!

Going back to the displayed scenario, 258.5 working days may appear a significant workload for the verification body. Yet, keeping in mind that verification request a shift from the current ad-hoc and reactive inspection to a systematic activity with an annual verification plan, 3-4 teams with 2 or 3 officers from provincial level in each team, complemented by district inspection staff would probably be sufficient to stem the workload, if reasonable risk levels can be reached through a well functioning regulatory inspection work of other agencies. Yet, observations made during the visits at DAFO and DOIC Hinboun indicate that current regulatory inspection practice is suboptimal and suffers from operational budget shortages. Moreover, local practice is still different from current regulations. DAFO received training for the implementation of Instruction 2492/MAF (2021) but continues to register plantations by field visits. Reporting before cutting and movement is only reported by few smallholders and MTP communicates only the annual harvesting plan. DOIC is not yet implementing 0777/MOIC (2020) and is not checking the internal management system of companies. Exports of plantation timber is still under POIC although 0981/MOIC 2021 is delegating it to the district level.

The model produces only a rough approximation of resources needed and a risk assessment methodology will have to be developed as part of the verification manual. Yet, risks contain different elements and may geographically be different. As a starting point, DOFI should come back to experience made during the development and implementation of the Strategic and Tactical Enforcement Patrol Program (STEPP) in the SUFORD project<sup>6</sup>, especially the threat and risk assessment and the STEPP matrix.

### 5.3.4 Supply Chain Control Confiscated Timber

TLD5 and supply chain control of confiscated timber by forms have been tested by POFI Attapeu in 2021. The testing was combined with the testing of a database management system, developed by an IT consultant. The consultant assessed the forms and was able to get access to the pilot web-based database management system.

The forms reviewed covered the steps described in the workflow developed during the work on TLD5, yet the data structure of log lists, i.e. data for logs and square logs, semi-finished or finished products are not fully clear. The data structure is only suitable for square logs (see Table 3) and does not contain an address (location of holding or a case number). Measurement procedures (when, by whom?) and rules (how?) are unknown, e.g. is Decision 0902/MAF (2021) used for logs of natural timber, how is plantation timber measured and graded? This is relevant in terms of the value of confiscated items which is an important input for the court proceeding, e.g. for the definition of a penalty, and again for the determination of the auction entry price.

Table 3: Data structure Form 03 / log list (source: POFI ATT)

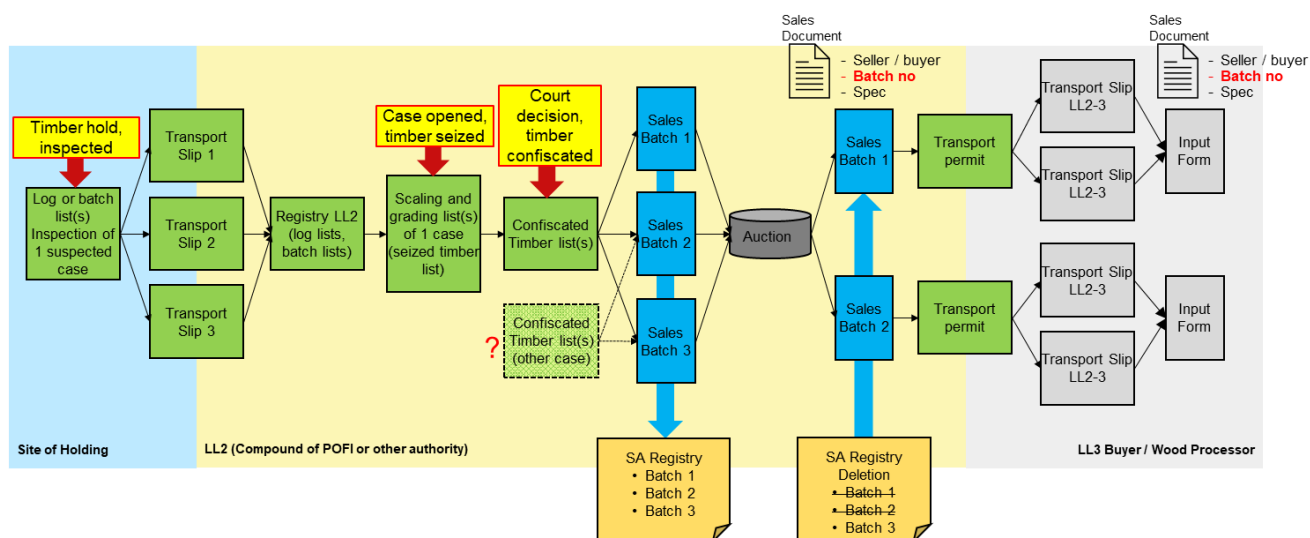
No.	Timber species	Logs/pieces No.	Size				Remarks
			Width	Thickness	Length	Volume (m <sup>3</sup> )	
1							
2							

An additional weakness of the series of forms is an inadequate linkage between the forms which does not allow traceability back to the place of holding or the separation of cases. Last but not least, the stage from the confiscated log list to the creation of sales batches is incomprehensible, assuming that items from different cases with similar specifications may be sold in one batch.

The data management system developed in Attapeu is a web application which allows to compile information on seized and confiscated timber. Yet, the data base does not include raw data, i.e. records of each single item seized or confiscated. The analysis of these records is made by standalone Excel files and then the result entered in the data base as seized or confiscated timber lists.

<sup>6</sup> Adams, W. B.: Strategic & Tactical Enforcement Patrol Program (STEPP). Department of Forest Inspection (2013).

For the inception meeting on confiscated timber in Khammouane, the consultant prepared a questionnaire regarding seizure and confiscation procedures and presented two workflows for the amendment of traceability forms. The following workflow shows possible supply chain records for confiscated timber moved to the warehouse of POFI.



- traceability should be possible back to each suspected case at the site of holding.
- Scaling and grading is implemented once a case is opened and the timber sized as this information is needed for the court proceeding
- It may make sense to establish sales batches with items from different cases; yet this needs to be reflected in the data structure

Table 4: Possible data structure confiscated timber

\*from Tree Master Species list (NAFRI)

<sup>7</sup> Update on status (29/11/2022): POFI ATT is currently drafting a regulation on the management of confiscated timber and a first workshop of the technical committee, including DOFI and DOF will be organized in mid-December



### 5.3.5 Legal Framework Confiscated timber

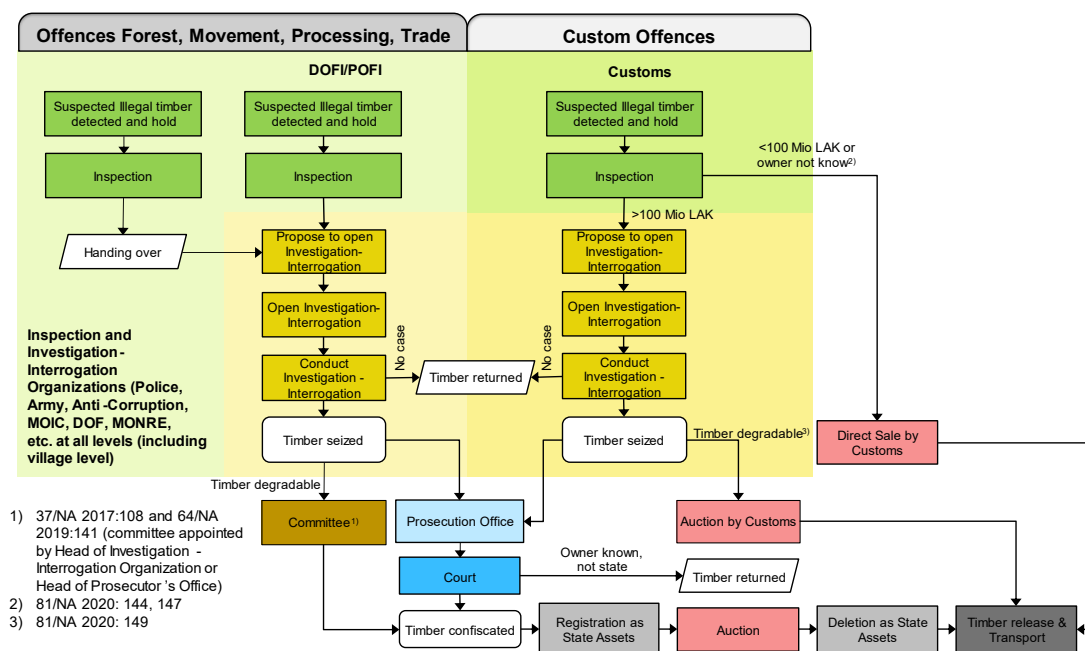
Main outcomes from the TWG meeting were:

- TWG members discussed the use of the proposed terms for hold, seized and confiscated timber. Some representatives pointed out that “mai kak” (hold timber) is not defined in the legislation, whether in 64/NA 2019 nor in 81/NA 2020 and should not be used in the TLD5.
- TWG members were not aware about other parties beside the five mentioned organizations in 37/NA 2017, art. 46.
- According to 64/NA 2019: 172, cases which involve suspected illegal timber are criminal offences and shall be subject to criminal proceeding. Thus, there are no administrative cases when timber is involved. A civil case is only opened when the owner is known, not the state and the plaintiff submits a complaint to the court.
- Minor offences which cause loss to the value of property worth less than one million Lao Kip (not 5 Mio Kip as indicated in the previous workflow) shall be settled by means of mediation or other forms of settlement by investigation-interrogation authorities (37/NA 2017, art. 11). This case does not need to be displayed in procedure as being irrelevant.
- Timber which will deteriorate rapidly has been raised again as important exception, addressed both in 64/NA 2019 and 81/NA 2020
- Representatives from the attending Investigation-Interrogation Organizations from Police and Environmental Police agreed with the principle to hand over hold timber to the forestry authority as described in 64/NA 2019, art. 141. However, the representative from Customs Department (81/NA 2020 Customs Law stipulates a different procedure for confiscated goods.

Especially the last point creates an inconsistency between 64/NA 2019 and 81/NA 2020. This has been acknowledged by participants, including a representative from the Department of Customs who was supportive to develop a specific regulation on timber to address this inconsistency.

After the TWG meeting, ProFEB advisors and the consultant revised the workflow for confiscated timber (Figure 12) based on the outcome from the TWG meeting.

Figure 12: revised workflow for confiscated timber



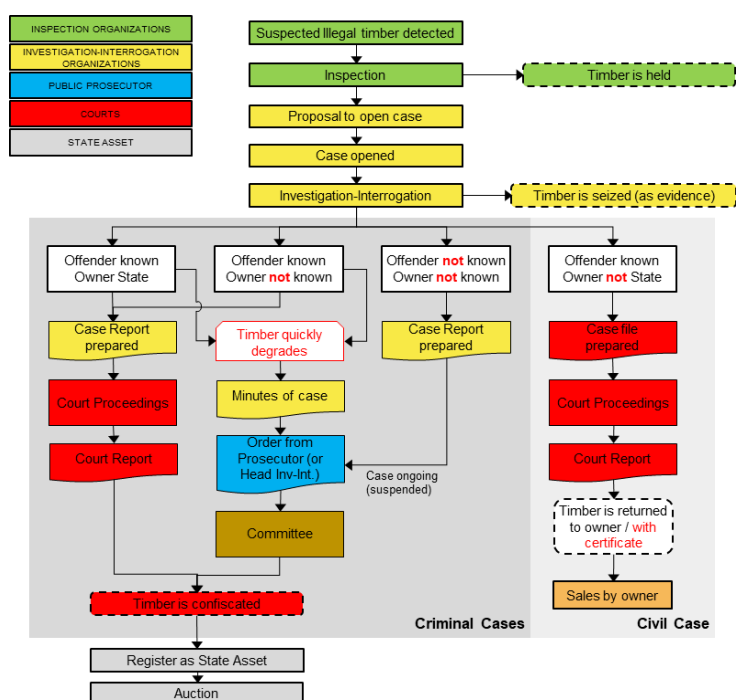
The new workflow is split into two main flows. Custom offences are addressed separately based on the Custom Law. According to 80/NA 2020, art. 138, a custom offence “is any act or omission that violates this law, other

laws or regulations, relating to the import-export, transit, movement or storage of goods”. Restricted goods (this includes timber) with a value evaded under 100 Mio Lao Kip shall be forfeited to the State (art. 143). According to a representative from Customs, direct sale of confiscated good is then proceeded. Prosecution is foreseen for cases when the value evaded is 100 Mio Lao Kip or greater. This is a remarkable difference to 64/NA 2019 which treats all cases which involve suspected illegal timber as criminal offences or the Penal Code 26/NA 2017 which defines 1 Mio LAK as threshold for mediation in case of criminal offences (art. 11) and foresees severe sentences for breaching regulations on forest management and protection (art. 311) with imprisonment for a term ranging from six months to two years and a fine shall be imposed ranging from 10,000,000 kip to 50,000,000 kip (26/NA 2017, art. 311).

The specific procedure for degradable timber is not included in the current version of TLD5 (as displayed in Appendix A5, v1.1 from 22-03-2022). The report from Hilary Smith mentioned this as urgent sale and referred to the previous version of the Criminal Procedures Law (17/NA 2012, art. 31.4). In the meantime, the procedures received a stronger legal foundation and is also mentioned in 64/NA 2019, art. 141 and 81/NA 2020, art. 141 and it has been integrated in the workflow in Figure 12. However, specific criteria how degradable is defined for timber could not be found in the legal framework.

The original graph from Smith (2018) was equally revised after the TWG meeting based on conclusions from the meeting (see Figure 13). The graph includes again the status of the timber in terms of offender and owner

Figure 13: Timber interception and confiscation (adapted from Smith (2018))



and thus reflects also the two scenarios 1) offender not known/owner not known and 2) offender known, owner not state. In the first scenario, the case would be suspended until new evidence could be found or the time limit for prosecution is expired (according to prosecutor office representative, the time is not fixed but defined on a case by case basis. A committee is then involved to decide on confiscation as for degradable timber. In a civil case, timber would be returned to the owner. TWG member agreed that the owner would be provided with a certificate which could be used as a legality proof, yet the format of the certificate remained unclear.

### 5.3.6 Additional Lessons Learned

The piloting, especially the two field exercises, gave participants a hands-on impression about the future mandate of the verification body and the main learning effect was that verification missions will have to be well prepared:

- Information collection on verification subjects before the verification mission to draft mission itineraries
- Checklists need to be adapted for each verification subject

Both piloting showed that teams were too large for the sake of the multiplication of learning effect; for additional piloting of verification smaller teams would be recommended, ideally composed only by future verification body staff from DOFI, POFI and DFIU. The team lead was slightly better in the second piloting but preparation not yet sufficient.

In general, the time on site was not sufficient for checking all verifiers and was often limited to a ticking off of the availability of documents rather than a factual check. This concern especially the verification of supply chain control which was additionally complicated by incomplete systems at most verified subjects. An often used technique during certification, the tracing back of products through the supply chain, was too challenging.

## 6 Recommendations

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The following recommendations are made with a certain distance in time from the piloting activities and take more recent developments into consideration, as perceived by the consultant during exchanges with the FLEGT advisors from ProFEB. This includes ongoing drafting or amendment processes of key regulations and the start of the KfW FLEGT-FC Project in September 2022. Moreover, the continuation of the VPA remains the great unknown as the EC has not yet approached the Lao Government with a proposal on the way forward.

The piloting showed that the tested verification procedures (step-by-step, by subjects) are robust enough and allow to outline the verification function in the TLAS Annex. The verification body has been reconfirmed by the NSDC. Appendices A and B have been endorsed and can be integrated in the TLAS Annex, although clarification is needed how to interpret the request from the NSDC to improve the structure of Appendix B. The piloting also helped to better understand the complementarity of verification and regulatory inspections. This needs to be described in the next version of the TLAS annex. The piloting did not cover the procedures how to handle failures to comply with the Lao TLAS. Yet, experiences made will inform the revision of the currently generic description in chapter 7 of the TLAS annex.

### **Recommendation 1: Revision of the TLAS annex**

- a) Revise chapters on institutional setup (chap. 3), verification of compliance with TLDs (chap. 4) and supply chain controls and related compliance verification (chap. 5) based on the further development of verification procedures and the conclusions from piloting.
- b) Decide how to integrate Appendix A and Appendix B in the TLAS annex. Two points need to be addressed: 1) Are TLDs kept as separate appendix or only in combination with verification procedures in Appendix A? 2) How to interpret the request from NSDC to merge all Appendices B to a single document?
- c) Revise chap. 7.1 on the procedures of the verification body for the handling of non-compliances with the Lao TLAS
- d) Put on hold the revision of other chapters which are depending on the decision regarding the future of the VPA process. This includes licensing, the role of civil society as independent observers in compliance verification and third-party independent audit.

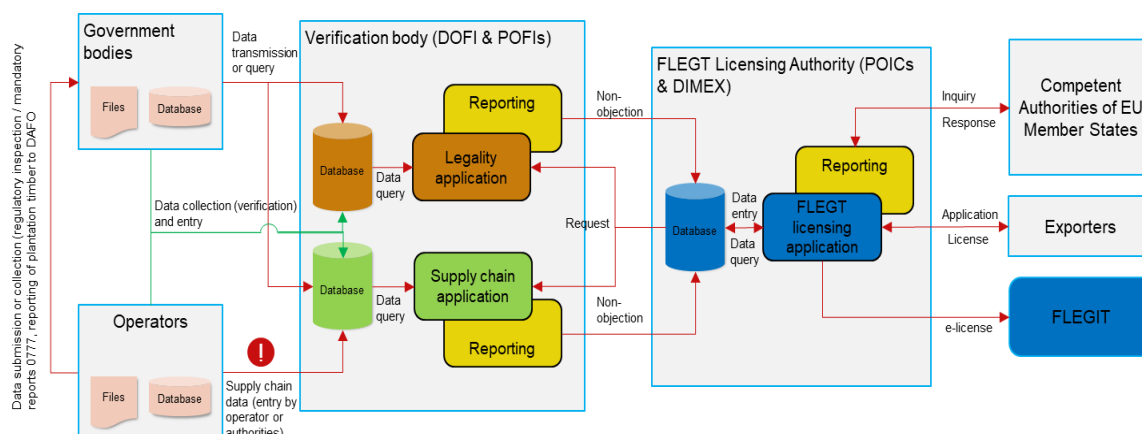
MAF/DOF is currently drafting a new decision which will replace 0777/MOIC 2020. This is a opportunity to clarify the scope of the existing regulation, reflect better on critical control points, rethink reporting

requirements of operators and mark out the complementarity of regulatory inspection and verification within the TLAS. Related to the drafting, DOF is assessing if the principle of the MOIC decision on plantation timber export (0981/MOIC 2021) to certify operators for a certain period of time could be adopted in the new regulation.

**Recommendation 2: Regulation on input-output management and monitoring**

- a) Scope: wood processors and traders (importers, exporters and wholesalers) shall establish an internal management system for input and output monitoring. Retailers/shops in the domestic market do not have to be part of the scope and don't need supply chain control. Yet, seller should provide them with a proof of legality of the sold product. This could e.g. be the previously mentioned "legal certificate" for domestic markets, anticipated by DIMEX.
- b) Critical control points (as described in Appendix B8): reflect requirements along critical control points of supply chains of wood processors and traders and records needed to ensure traceability.
- c) If an approach to certify legality and functioning of internal management system is envisaged, align it with agreed elements of the Lao TLAS: 1. DOFI and line agencies is the designated verification body thus should be the entity to certify legality with the verification of compliance with TLDs. 2. frequency of verification missions should be based on risk criteria to be defined
- d) In case the VPA negotiation continue and the VPA is successfully concluded, certified companies would still need to provide supply chain data based on a mass-balance approach for the issuance of a FLEGT license for each consignment and the verification body would check this in the IMS and issue a letter of no-objection. To make this work in near real-time, operators would need to enter supply chain data in the supply chain application of the IMS. PFS or the corresponding district-level government bodies could enter data for operators not having access to the information management system, e.g. volume or weight reported by plantation owners. This functionality is shown in Figure 14 with the three main components of the IMS for the Lao TLAS.
- e) If Lao PDR confirms to allow the sale of products from confiscated timber only on the domestic market, the segregation of confiscated timber should be defined in the regulation.

Figure 14: Information Management System for Lao TLAS (adapted / further developed from IMS report, fig. 1<sup>8</sup>)



The draft decision from the technical committee, entitled "On the management and following up the timber input and output" from Nov. 15, 2022 and shared with the consultant, is taking over most of the key requirements of 0777, including requirements for the management system, the documents "for following up the timber input and output", reporting duties of the operators and inspection by authorities. Management system and document requirements are subdivided in respective articles for different categories of wood processors, traders ("import and export company") and wood shops and warehouses.

<sup>8</sup> Lounasvuori, J.; Pruden, P.: Development of an Information Management System for Lao TLAS. GIZ (2021)

As the above recommendations are not yet considered (warehouses and shops in the scope – although the difference does not become clear), reporting is still designed as quarterly reporting of input and output, inspection is undertaken by DOF and line agencies, DOFI and line agencies are not mentioned), it is recommended that DOF follows up urgently on points discussed during the TWG meeting on Nov. 30, 2022. ProFEB should consider to support technically the continuation of the drafting process.

Between October 18-20, 2022, the KfW FLEGT-FC Project organized a planning workshop. ProFEB attended the workshop and presented the status of the TLAS development. ProFEB shared the minutes of meeting with the consultant<sup>9</sup>. During the workshop, the project log-frame and related outputs and respective activities have been updated. The KfW FLEGT-FC Project is currently in the inception phase and developing the detailed work-plan. This is an important window of opportunity to align agreed TLAS elements, work on the regulatory framework and the TLAS implementation supported by the KfW project. The project plans to complete the workplan and present it during an official project launching workshop in January 2023. Output 3 of the project is strengthening capacities of government agencies for the implementation of the Lao TLAS and activities are focusing on training and development of modules for the IMS. The workshop revision of output 3 mentions explicitly the complementarity of regulatory inspection and verification. Beside the training, activities should include the development of the overall management system of the verification body (see Figure 1). Actually, this is a pre-requisite for the development of the training curriculum.

***Recommendation 3: Align work plan of KfW FLEGT-FC Project to support the development of an overall management system of the verification body***

- a) Even though the verification procedures are outlined and a first estimate on resources made, an in-depth capacity needs assessment of DOFI/POFI and DFIU should be undertaken, including an assessment of the necessary operational budget for the implementation of the verification mandate.
- b) After these assessments, a comprehensive management system should be developed, including definition of organizational structure, resources and internal quality control and, as the core element, the verification manual, based on the outlined verification procedures in the TLAS Annex. The verification would include planning tools, templates for checklists and define risk levels and sampling rates for the definition of verification intensities as described in Appendices A.
- c) As an additional step, mandates of regulatory inspection agencies should also be reviewed and the current status of implementation, gaps and inconsistencies analyzed. A systematic and comprehensive inspection work and availability of information stored in the IMS is a pre-requisite for a lean and efficient verification of the TLAS requirements of operators and products.

POFI ATT is drafting a regulation on the management of confiscated timber and will present a first draft in a workshop with DOFI and DOF in mid-December 2022. It is suggested that lessons learned from the piloting are informing the drafting process. In parallel, TLD5 should be revised.

***Recommendation 4: Inform the drafting of a regulation on the management of confiscated timber with lessons learned from the piloting***

- a) Clarify mandates, roles and responsibilities of investigation-interrogation organizations during timber interception and confiscation. Address the existing inconsistency between 64/NA 2019 and 81/NA 2020 and the different procedures for custom offences.
- b) Develop supply chain control forms and data structure for critical control points based on the proposal discussed in the piloting in KM (Figure 11 and Table 4).
- c) Once the procedures, forms and data structure are defined, the pilot data management system can be further developed to an integrated system where raw data is directly entered in e-forms with handheld devices, e.g. tablet (open software, e.g. ODK Collect used by DOFI for SPIRIT or for OLDLM) and then analyzed and compiled to log lists and ultimately sales batches. Hardcopies can be printed through a report function and signed.

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<sup>9</sup> Meeting Minutes. Planning workshop for the implementation of the FLEGT-FC Project. Vientiane Capital, 2 November 2022



## Annex A Itineraries Piloting Plantation Timber

<b>Name of Piloting Site</b>	Burapha Agro-Forestry (Head office, Nabong Factory) / DAFO Xaithani
<b>Date of piloting</b>	03-04/02/2021

This itinerary sets out a provisional timetable for the forthcoming test of verification and export procedures. It should be noted that the piloting team may decide to change the itinerary and that the outline below may, therefore, change.

### Opening and Closure

Date	Time	Location	Activity / Verification topics	Personnel Operator / Government Staff involved
03/02/2021	9:00-10:30	Head Office Burapha	Opening Meeting <ul style="list-style-type: none"> <li>- Introduction of participants</li> <li>- Objectives of piloting</li> <li>- Presentation of company (organization, timber supplies chains, processing site Nabong)</li> <li>- confirmation of piloting itinerary</li> </ul>	Souphayvanh, Ly,
04/02/2021	14:30-16:00	Head Office Burapha	Closing Meeting <ul style="list-style-type: none"> <li>- Presentation of findings</li> <li>- Discussion</li> </ul>	

### Team A

Date	Time	Location	Activity / Verification topics	Personnel Operator / Government Staff involved
03/02/2021	10:30-12:00	Head Office	Concession: ESIA/ESMMP, feasibility study, investment application, concession agreements  Factory operation certificate, forest business registration, ESIA/EMMP factory	Ly (29944554) ly@buraphawood.com
03/02/2021	12:00-13:00	nearby restaurant	Lunch	
03/02/2021	13:00-14:30	Head Office	Finance: tax obligations, salary payments, social security.	Dominique
03/02/2021	14:30-15:00	Head Office	HR (employment contracts)	Dominique
04/02/2021	07:30-8:30	n/a	Travel to Nabong (discuss logistics during briefing meeting of piloting team)	
04/02/2021	08:30-09:30	Nabong Factory	Work safety (OSH guidelines PPE, trainings)	Jerome
04/02/2021	09:30-12:00	Field visit at sample plantations	Validate harvesting data at field site	Souphayvanh, Ly
04/02/2021	12:00-13:00	Restaurant in M. Xaithani	Lunch	
04/02/2021	13:00-14:00	n/a	Travel back to Vientiane (Burapha HQ)	

## Team B

Date	Time	Location	Activity / Verification topics	Personnel Operator / Government Staff involved
03/02/2021	10:30-12:00	n/a	Travel to Nabong	
03/02/2021	12:00-13:00	Restaurant near Nabong Factory	Lunch	
03/02/2021	13:00-15:00	Nabong Factory	timber supplies (sellers), input-Output monitoring, sampling of log lists from recent harvesting operations in Xaithani district	Jerome
03/02/2021	15:00-16:00	Nabong Factory	Export procedures (if possible, a concrete consignment)	Jerome
03/02/2021	16:00-17:00	n/a	Travel to Vientiane Capital	
04/02/2021	07:30-08:30	n/a	Travel to M. Xaithani / DAFO	
04/02/2021	08:30-10:00	DAFO Xaithani	Planation harvesting statistics, transport permits  Tracing back sampled log lists to seller's plantation registration certificate and land use rights document	
04/02/2021	10:00-12:00	Field visit at sample plantations	Validate harvesting data at field site	
04/02/2021	12:00-13:00	Restaurant in M. Xaithani	Lunch	
04/02/2021	13:00-14:00	n/a	Travel back to Vientiane (Burapha HQ)	

## Annex B Sample checklist for conversion areas

Checklist for the verification of the pre-harvest inventory stage (including verification of supply chain control, lower part)

Checklist 2: Pre-harvest inventory in conversion areas							
Application scope: Each conversion site (whole site) or a smaller/annual portion of conversion site							
Timing: After completion of pre-harvest inventory							
Intensity: Sample-based field observations/measurements							
Indicator No	Indicator Text	Verifier No	Verifier	Verification Guidance	C	NC	Remarks
2.2.1.1	The agriculture and forestry sector has conducted demarcation of harvesting areas, inventory of tree species, standing trees and volumes and summary of timber information to report to the Government for consideration.	2.1.1.1.1	Report of results of pre-harvest inventory	Check that the agriculture and forestry sector has documented the results preharvest inventory Check in the field the site has been demarcated			
Supply chain requirement:		Pre-harvest inventory must be accurate providing the exact number of harvestable trees by tree species and measurements of diameter at breast height (Comment: This can be changed later to sample-based inventory, once the regulations are reformed to allow them)					
Operational control data		Verification guidance			C	NC	Remarks
Report of results of preharvest inventory or Data on pre-harvest inventory in information management system	Take sample measurement of trees (requires separate guidelines) for validation of the pre-harvest inventory						
	Compare sample measurements with those of the pre-harvest inventory report (manual method that requires entering/uploading pre-harvest inventory results and sample measurements into an e-file) or						
	Upload the sample measurements and compare them with measurements of pre-harvest inventory (within information management system) <sup>1</sup> .						
	If diameter discrepancy is less than X% and species discrepancy less than X%, validate the result of preharvest inventory						

## Annex C Implementation Schedule Piloting 1

Step	Description	Date(s)	Duration	Remarks
1	Consultation with TWG key stakeholders	13-15 Oct. 2020	3 days	-
2	Consultation of all TWG members	18-20 Nov. 2020	3 days	-
3	Piloting (field implementation)			
	Inception meeting piloting team	25 Jan. 2021	½ day	-
	<b>Burapha</b>			
	Preparation meeting	21 Jan. 2021	1.5 hrs.	A extracurricular preparation meeting between Burapha and DIMEX has been suggested by Head of DIMEX on short notice and was supported by ProFEB (as part of piloting of export procedures)
	Briefing meeting piloting team	02 Feb. 2021	1 day	The meeting was extended from ½ to 1 day compared to initial concept. As suggested during preparation meeting, involved staff from provincial and district level were also invited (PFS, POFI, POIC, DAFO, DOIC)
	Verification exercise	03-04 Feb. 2021	2 days	
	Debriefing meeting piloting team	05 Feb. 2021	1 day	
	<b>Douangdy</b>			
	Briefing meeting piloting team	23 Feb. 2021	½ day	Briefing meeting only ½ day as initially planned. Staff from provincial and district level were again involved (PFS, POFI, POIC, DAFO, DOIC)
	Verification exercise	23-24 Feb. 2021	1 day	only 1 resource person (manager) was available on at company / could not split into 2 teams. On the second day, exercise was shorten (only quick assessment of input-output monitoring and OSH), DAFO and DOIC Laognam visits and a teak plantation and completion of verification mission before lunch.
	Debriefing meeting piloting team	24 Feb. 2021	2 hrs.	Debriefing meeting was only held with central level piloting team in the afternoon after the mission (MOIC staff had to travel to Pakse in the evening for a meeting with Minister ,organized on short notice the next day).
	<b>NK3</b>			
	Briefing meeting and verification (desk exercise with PFS and DFU Phouvong)	25 Feb. 2021	1 day	Briefing meeting and desk exercise were combined in a single meeting of 1 day. Checklists 6 (Auction) was only briefly discussed and agreed on by the piloting team. Checklist 7 (Wood Processing) was not assessed as no company which is processing timber from NK3 has been visited.
	Field trip to NK3, LL2	26 Feb. 2021	0.5 day	Visit of LL2, consultation with DFU Phouvong, discussion of validation of supply chain control data. No harvesting sites or LL1 visited, no interviews with harvesting contractors (as according to PFS/DFU site not operational).
	Debriefing meeting	26 Feb. 2021	0.5 day	After debriefing meeting, a short reunion was organized with Head of POIC for a discussion of auction procedures.
4	Final Consultation	15-18 March 2021	2.5 days	

## Annex D Challenges encountered during verification missions

### Verification mission for plantation timber at Burapha, DAFO and DOIC Xaithany

Team	Location	Checklist	Challenges
A	Headquarter	Concession	No challenges, documents were readily available at HQ
A	Headquarter	Enterprise	No challenges, documents were readily available at HQ
A	Headquarter	HR-Finance	No challenges, documents were readily available at HQ
A	Sawmill or Forest	OSH Forest, OSH Wood processing	No forest operations in own concessions (was not clear in advance), OSH wood processing was discussed at Nabong Factory as planned
B	Sawmill and DAFO Xaithany	Plantation registration	Most timber supplies for Nabong are currently from southern provinces through a middleman / No plantation in Xaithany could be traced back through DAFO Xaithany and then visited
B	DAFO Xaithany	Reporting to DAFO	Reporting before cutting and before transport not yet implemented
B	Sawmill	Input-Output Monitoring, Export	COC Documentation company available, not yet input-output monitoring reports 0777, yet time too limited to assess at all verifiers
B	DOIC	Input-Output Monitoring, Export	no reports available, export still under responsibility of provincial level

### Verification mission for plantation timber at Douangdy, DAFO and DOIC Laongam

Team	Location	Checklist	Challenges
A&B	Factory	Concession	Not applicable, no concessions
A&B	Factory	Enterprise	Not all documents were readily available at factory
A&B	Factory	HR-Finance	Not all documents readily available
A&B	n/a	OSH	Not assessed at working sites, only discussion with owner
A&B	Factory, Plantation	Plantation registration	Suppliers mostly households, Doungdy has a logging / supplier team of 2 staff which organizes cutting and transport / No plantation in Laongam could be traced back through DAFO and then visited, a plantation in neighbour district was visited
A	DAFO	Plantation Registration, Reporting to DAFO	Reporting before cutting and before transport implemented with different procedures, including inspections from DAFO. Reports have not been assessed
B	Factory	Input-Output Monitoring, Export	Input-output monitoring system only partly established
B	DOIC	Input-Output Monitoring, Export	no reports available, export still under responsibility of provincial level

### Verification mission for conversion timber at NK3, DOFI Attapeu

No	Checklist / Step	Challenges
1	Approval Conversion	Most documents regarding concession, environmental and social impact assessments and mitigation were not available
2	Pre-harvest Inventory	Supply chain control verification was not possible / logging operation already closed, no access to field sites as flooding started
3	Harvesting Planning	Documents available; yet not everything verified in-depth due to time constraints
4	Harvesting, Scaling/Grading	Harvesting finished, no access to harvesting sites anymore. Supply chain control has been discussed at LL2 and some sample logs verified regarding traceability / scaling grading
5	Post-harvest Activities	Many duplication with Checklist 4. Suggestion to combine
6	Auction	Checklist discussed, yet documents not verified in-depth due to time constraints
7	Timber processing	No visit of companies who won auction / Checklist not tested

## Annex E Applicability of indicators / verifiers TLD3, 7 and 8

Type	Number	Issue	Comments Piloting Team
Criterion	8.1.3 A and 8.1.3 B	Compliance with environmental and social impact requirements	to be combined (as in TLD2)
Verifier	8.1.1.1.1	License and permits for wood processing and trading operations	“Agriculture and forestry business operational license”: how is the procedure, what is the verifier according to law No 64 under article 104?
Indicator	7.1.1.1	Contract of employment	To specify in indicator that written contracts are also mandatory for temporary workers if one party is a legal entity or organization.
Verifier	8.1.2.3.2	Tax invoice	Verifier not related to indicator and recommended to be deleted.
Indicator	8.1.2.4	Payment of tax – excluding household business	Most likely, legal framework has been changed and also household business (micro-business?) have to pay tax referring to the recent notice of MOF regarding individual income tax
Indicator	8.1.2.1, 8.1.2.2, 8.1.2.3, 8.2.1.1 and 8.2.1.2	legal references	legal references need to be revised as Decision No 0777 was approved
Indicator	7.3.1.3	Receiving training on safety of using chainsaw	Theoretically, trainers are available, but trainings have not been implemented. For the case of Burapha and Douangdy, trainings were conducted by the companies themselves. It was suggested to delete verifier “chainsaw registration letter” from this indicator as not relevant

## Annex F Overview of Supply Chain Records (v2.0 as endorsed during NSDC in April 2022)

### Timber Sources

	Source	Origin / Address	Product Identification	Product classification	Product Description	Product Specification			Link to Source		
						LL1*	LL2	LL3			
Round wood (individual logs)	PFA	PFA, FMA, SFMA, compartment, base line, strip line, PHI no, tree no	unique log no	HS Code (0851/MOIC 2021)	Description (0851/MOIC 2021)	Lao name, species code**, length, average D1, average D2	PLUS scientific name***, length, diameter, volume, grade	Lao name, scientific name, length, diameter, volume, grade	transport slip no, auction batch no, contract (or invoice)		
	CA	project name, compartment, PHI no, tree no				Lao name, species code, length, average D1, average D2 + volume, grade, use			transport slip no, sales log list no, contract (or invoice)		
	VUF	village name, compartment, PHI no, tree no				Lao name, species code, length, average D1, average D2 + volume, grade			sales log list no, contract (or invoice)		
	ILEO	Tree certificate				Lao name, species code, length, average D1, average D2	Lao name, scientific name***, length, diameter, volume, grade		transport slip no, auction batch no, contract (or invoice)		
	confiscated	Site of holding / seizure (coordinates?)				Lao name, scientific name, length, diameter, volume, grade			transport slip no, sales log list no, contract (or invoice)		
	Imported	Import permit									
Sawn wood (individual logs)	confiscated	Site of holding / seizure (coordinates?)	unique log no					Lao name, species code, width, length, height, volume	Lao name, scientific name, width, length, height, volume	transport slip no, auction batch no, contract (or invoice)	
	Imported	Import permit						Lao name, species code, width, length, height, volume		transport slip no, sales log list no, contract (or invoice)	
Round wood in batches	Plantation	Plantation registration certificate or planted tree certificate	batch no					Lao name (trade name), scientific name, no of logs, volume or weight		Lao name (trade name), scientific name, no of logs, volume or weight	transport slip no, sales batch list no, contract (or invoice)
	confiscated	Site of holding / seizure (coordinates?)					Lao name, scientific name, no of logs, volume or weight	transport slip no, auction batch no, contract (or invoice)			
	imported	Import permit				Lao name (trade name), scientific name, no of logs, volume or weight + country of harvest		transport slip no, sales batch list no, contract (or invoice)			
Processed timber in batches	confiscated	Site of holding / seizure (coordinates?)	batch no					Lao name (trade name), scientific name, no of products, volume or weight	Lao name, species code, no of products, volume or weight	Lao name (trade name), scientific name, no of products, volume or weight	transport slip no, auction batch no, contract (or invoice)
	imported	Import permit				Lao name (trade name), scientific name, no of products, volume or weight +		transport slip no, sales log list no, contract (or invoice)			

\*Forest, LL1, Land of ILEO, Site of Holding/Seizure, Border, trader storage

\*\*from Tree Species Master List by NAFRI

\*\*\*field for CITES if applicable (conversion area, confiscated timber)



## Processing and trade

	Product Identification		Product Identification	Product classification	Product Description	Product Specification / Raw Materials Storage	Link to Sales (only if applicable)				Product Identification	Product classification	Product Description	Product Specification / Warehouse	Link to Sales
Round wood (individual logs)	log ID	Primary Processing	item ID or bundle no*	HS Code (0851/MOIC 2021)	Description (0851/MOIC 2021)	Lao name, scientific name**, length, width, thickness, no of items, volume or weight	sales contract or delivery batch semi-finished product	Processed timber	Secondary Processing		item ID or bundle no	HS Code	Description	Lao name, scientific name, HS Code, length, width, tickness, no of items, volume or weight***	sales contract or delivery batch finished product
Round wood in batches	batch no		bundle no												

\*depends on traceability system (ID tracking or mass balance only)

\*\*from Tree Species Master List by NAFRI

\*\*\* depends on product