

# BONNIER

Books

## PAPER SOURCING COMMITMENTS & GUIDELINES

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## INTRODUCTION

**For Bonnier Books as publisher**, paper is at the core of our business and tightly connected to our economic wellbeing as well as ecological responsibility. Harmonizing those two perspectives is one of our operational major tasks. The sustainability of paper is connected to several factors of its manufacturing and supply chain: environmental impacts when being produced, from which areas it is sourced, sustainable forest management, respect for forest land rights, biodiversity as well as topics on plantations and primary forests.

Bonnier Books and its publishing businesses are not purchasing paper for our products directly but indirectly through our print suppliers. We see it however as our responsibility to address risks and to set up requirements that shall underline our understanding of sustainable paper sourcing.

## SCOPE

This document sets up requirements and guidelines for the paper being used for our products. It addresses the dimensions of compliance and additional processes to minimize risks and applies to all Bonnier Books publishing businesses. Implementation will be done from 2023 and this document is under periodical review.

## BACKGROUND & PURPOSE

One of the biggest challenges within paper production is illegally harvested\* timber which happens on the grounds of corruption and bribery, tax evasion, disregarding land rights and contributes to the climate crisis through deforestation\* and forest degradation. National and international legislation have been set up to counteract actively against this matter and were implemented (among others) in the EU under the Timber Regulation (995/2010)\*, in the US under the Lacey Act, in the UK the Timber and Timber Products Placing on the Market Regulations\* (UKTR), or the CITES\* agreement. Bonnier Books and its businesses acknowledge the challenges arising from illegally harvested\* timber and thus avoid paper from these sources. We use certification schemes (as listed under approved sources\*) as important tool to support responsible raw material sourcing though it is not always sufficient to solely rely on certified material. We are therefore assessing paper companies regarding their due diligence, encouraging print suppliers to set up paper procurement policies, and are blacklisting those paper producers who demonstrably violated international rules on legal sourcing of timber.

Next to the legal part, we use additional environmental assessments on paper producers and thus prioritize those investing in lowering their environmental impact. This regards factors like air emissions, water emissions, waste management, biodiversity, deforestation\*, and related governance practices.

This document is connected to Bonnier Books' [Production Sustainability Commitments & Implementation](#) and further details our approach on sustainably sourced material.

*Note: Certain terms underlie different definitions. Those occurring in the Terms section are marked in the main text with an asterisk\*.*

## COMMITMENT

Bonnier Books and its businesses acknowledge the negative impact of deforestation\* and forest degradation. We commit to work actively against deforestation\* in our supply chains and towards the exclusion of any material stemming from high conservation value areas (as per FSC principle 9) and harvested in disregard of legal compliance or land rights of communities or indigenous people.

### Direct supplier (printing facilities)

Paper material that is used for Bonnier Books products shall come from responsibly managed sources and be traceable upstream in the supply chain. Our suppliers must therefore follow requirements under the EU Timber Regulation\* (if applicable) and shall have a management system (similar to ISO 9001 or 14001) in place that allows traceability of used materials along the supply chain.

Our direct major suppliers shall implement paper procurement policies to clearly communicate expectations around compliance and sustainable practices towards their paper suppliers. Of course, sustainable forest management schemes (like FSC or PEFC) play an important role in supporting compliant and responsible practices. Additional risk assessment and clear procurement standpoints are perceived as a complimentary tool. Our expectations towards our direct suppliers are further detailed in our [Production Sustainability Commitments & Implementation](#).

## Indirect supplier (paper manufacturers)

The forest industry and its stakeholders have an important role in meeting climate change. Forests (and one of its characteristics as being carbon sinks) are crucial in fighting climate change and mitigating its effects. It is highly important to implement sustainable and responsible practices for timber products.

We expect our indirect paper suppliers to adhere to the sustainable forest management principles as expressed in the FSC principles, thus respecting high conservation value areas, land rights of communities and indigenous people, and avoid sourcing from converted areas.

As corruption and its many faces unfortunately occur also in the timber harvesting sector, our indirect upstream suppliers shall implement policies against corruption, bribery, money laundering, or “timber laundering<sup>sm</sup>”. Measures for safeguarding occupational health and safety, and the principles according to ILO conventions must be implemented. Availability of grievance mechanisms are seen as crucial for actual effectiveness.

Next to internal assessments on ethical business practices and governance, the environmental footprint of the paper mills is a key factor in fighting climate change. As one of the more energy-intensive industries, paper companies must invest in energy efficiency, a higher degree of self-sufficiency and reduce energy consumption from high-emitting sources. These strategical decisions will receive a decisive part in identifying our long-term material choices.

Lastly, we acknowledge the financial and strategical pressure being put on paper manufacturers and are therefore setting up clear expectations with this document. Any paper producer who reportedly did not adhere to ethical business practices or acts in grave disregard of its environmental impact will not be considered as material choice for Bonnier Books products.

## Bonnier Books Products

### Certificates and emissions

As stated in our [Production Sustainability Commitments & Implementation](#), we are committed to source a minimum of 95% of our papers from approved sources\* until 2025.

Next to this, emissions from pulp, paper, and board production (shortened to “paper” in the following text) play a central role for our material choices. As an active participant in the Science Based Target initiative following the 1.5°C pathway, we are using emission thresholds according to those of the Transition Pathway (Below 2 Degree scenario) and are adapting our paper choices accordingly in consecutive steps. As paper has big share on overall production emissions, we will thus be able to reduce our emission impact in short- and mid-term.

### Reduce, reuse, recycle

With respect to the European Circular Economy Action Plan, one of the building blocks of the EU Green Deal, we acknowledge the need to further support circularity within our value chain under the guidelines of “reduce, reuse, recycle”. Paper (and other components of our products) is part of a cycle, with high recycling rates in the EU and UK. Forests (especially in the light of climate change) are a sensitive resource, therefore we need to be aware of our material input.

To mitigate this impact, we are further focusing together with our print suppliers on machine-optimized book formats that lead to a higher material efficiency and a decrease in paper waste.

Together with our suppliers, we investigate moreover to avoid components or compound materials that have a negative impact on the recycling phase and will regard this already in the design phase of our products.

## CONTACT

For questions or to get in touch, please contact [sustainability@bonnierbooks.com](mailto:sustainability@bonnierbooks.com).

## AUTHORITY

This document is issued by Bonnier Books' CSR advisory board which can be reached under the e-mail address above and will be reviewed annually.

## TERMS

**Approved sources** according to the definition in our [Production Sustainability Commitments & Implementation](#): "Approved sources are evaluated and confirmed by the Bonnier Books Production Board. These include papers that are [Book Chain Project] Grade 3 or above, and those listed under Certified Paper", namely "FSC, PEFC, Nordic Swan, Blauer Engel and EU Ecolabel".

**CITES** (Convention on International Trade in Endangered Species of Wild Fauna and Flora) is an international governmental agreement to ensure that no endangered wildlife and plant species are traded.

**Deforestation** is understood as the permanent conversion of natural forest land into other uses (e.g., agricultural, non-forest land use), aligned with the definition of [FAO Global Forest Resources Assessment 2020 – Terms and Definitions](#). Depending on the different definitions available, plantations are sometimes defined as conversion, sometimes they are exempt. In order to address this further, we are using the FSC Principle 6.9 (FSC-STD-01-001 V5-2) for our approach: "The Organization\* shall not convert natural forest\* to plantations\*, nor natural forests or plantations on sites directly converted from natural forest to non-forest land use, except when the conversion: a) affects a very limited portion of the area of the Management Unit\*, and b) will produce clear, substantial, additional, secure long-term conservation benefits in the Management Unit, and c) does not damage or threaten High Conservation Values\*, nor any sites or resources necessary to maintain or enhance those High Conservation Values." (Asterisks in the FSC text refer to parts within the FSC document)

**EU Timber Regulation (EUTR)** This [regulation](#) (995/2010) is the legislative foundation to control placement of timber products that stem only from legal sources. There are two criteria to identify if a company is bound to the requirements of the EUTR: (a) what kind of timber and timber product is it and (b) who places the product on the EU market?

The EUTR applies to products as listed in the legislation's appendix under the respective Combined Nomenclature (EUTR 995/2010, Annex), for example number 47 and 48. If the imported product is among this list, the type of actor (who is placing the product on the internal market for the first time) needs to be decided: "operator" or "trader". An "operator" is "any natural or legal person that places timber or timber products on the market" (EUTR 995/2010, Art. 2 (c)); a "trader" is "any natural or legal person who, in the course of a commercial activity, sells or buys on the internal market timber or timber products already placed on the internal market" (EUTR 995/2010, Art 2 (d)).

**Illegally harvested** as defined by the EU Regulation 995/2010, Art. 2 (g) "means harvested in contravention of the applicable legislation in the country of harvest".

**Timber and Timber Products Placing on the Market Regulations (UKTR)** As with 01 January 2021, the European Timber Regulation does not any longer apply to the UK market and was substituted by the Timber and Timber Products Placing on the Market Regulations (UKTR). However, requirements remain the same as under the European Timber Regulation according to [Office of Product Safety and Standards](#), "Regulations: timber and FLEGT licenses".

**Timber laundering** "means converting illegally-cut logs to legally-certified timber by exploiting legal loopholes – such as those relating to transport of timber, or certification of origin – and relying on smuggling channels to bring the goods to market. As a result, companies buy raw timber for further processing and consumers purchase the end products without knowing the origin of the timber they have bought." (Transparency International, Working Paper #07/2010)

## **RELATED DOCUMENTS**

Bonnier Books Production Sustainability Commitments & Implementation  
Book Chain Project Code of Conduct  
Bonnier Group Anti-Corruption Policy  
Bonnier Group Whistleblowing Policy  
EU Circular Economy  
Glasgow Leaders' Declaration on Forests and Land Use  
UN FAO Global Forest Resources Assessment 2020  
Regulation (EU) No 995/2010  
EU Deforestation-free Supply Chain Regulation

## **RESOURCES**

Accountability Framework initiative  
Book Chain Project Mill Assessment Framework  
Carbon Disclosure Project (CDP) Forest risks  
Chatham House Forest Governance and Legality  
Forest 500 Assessment Methodology