



GLOBAL FORESTRY SERVICES

Registered Office: 2446 N. San Gabriel Blvd., Suite #C, Rosemead, CA 91770, USA.
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WOOD TRACKING PROGRAM

Chain of Custody Checklist & Assessment Report

Organization	BTN Distributors Limited
Contact Person	Mr. Declan Thornton
Office Address	19, Main St, Cashel, Co Tipperary, Ireland.
Mill Address	Yoltan Corporation (Pahang) Sdn. Bhd.(304211-W): No. 9, Jalan Industri 3, Taman Perindustrian Temerloh, 28400 Mentakab, Pahang, Malaysia.
Telephone	062 61240 / 062 61658
Fax	-
Email	Pets@btn.ie

Reference #	GFSS 083-001
Proposal # Assessment #	GFSSP23-07-314 01
Assessment Date	24/07/2023
Date of Report Date of close out	25/07/2023 -
Lead Assessor	Anne Gimbir
Assessor	-
Approved By	Dr. Kevin Grace

Statement of Compliance

GFS WTP #	GFS 280 WTP
Issuance Date	01 August 2023
Expiration Date	31 July 2028

Scope of Assessment

Company Type	Charcoal manufacturing
Scope of Assessment	Yoltan Corporation (Pahang) Sdn. Bhd.
Product Group	Charcoal Briquettes from sawdust (By-products of sawmilling that its lifecycle completed and would otherwise have been discarded)
Source of Material	Pahang - Peninsular Malaysia, Malaysia.
Species	<i>Rubroshorea parvifolia</i> , <i>Rubroshorea macrantha</i> , <i>Rubroshorea lepiota</i>

Limitations of Assessment

The information presented in this report is based on documents provided by the client and objective evidence observed and recorded as findings during the site assessment. GFS reporting of information presented by the client is taken as accurate, unless evaluated differently through the observations made during the assessment. All information presented in the report is accurate and complete to the best of knowledge of GFS.

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Background Information:

BTN Distributors Limited is a wholesale supplier of the Pet, Agri, Hardware & Garden products since 1979. Their main products include pet food, bird food and eco-fuels. BTN Distributors Limited has ensured that it's supplier, Yoltan Corporation (Pahang) Sdn. Bhd. is compliant under the GFS Wood Tracking Program as part of the EUTR and Due Diligence Requirements.

Yoltan Corporation (Pahang) Sdn. Bhd. (YCP) is registered under the SSM in Kuala Lumpur on 13/06/1994, with registration #: 304211-W. YCP is engaged in sawdust briquette manufacturing and marketed its products to South Korea, Japan, Turkey, Greece, Saudi Arabia, the USA and Australia. YCP also marketed the Biomass (raw briquette) to Korea & the EU market.

Associated Organizations & Subcontractors:

YCP does not engage any companies as their subcontractors to manufacture products.

Description of the Supply Chain:

YCP purchases waste wood evaluated as low risk through the evaluation of risk based on the GFS Risk Assessment guidelines, Risk Matrix.

Supplier	Harvest License	Location	Material	Certificate #	Overall Risk*
HD (Mentiga Corporation Berhad)	CK-01-12-20(KP)(P)	Pahang Malaysia	Sawdust	-	Low
HD (Yayasan Pahang)	CJ-01-7-23(KP) CJ-01-11-23(KP/K) CJ-01-13-22(KP)	Pahang Malaysia	Sawdust	FMC-NF-00008 (31/05/2024)	Low
Kembara Kemuncak Sdn. Bhd.	CJ-01-11-22(KP)(P)	Pahang Malaysia	Sawdust	-	Low
Sykt Rizzs Trading Sdn Bhd	AK-01-12-23(P)	Pahang Malaysia	Sawdust	-	Low
Royar Creative Wood Sdn Bhd	CJ-01-3-23 (KP)(P)	Pahang Malaysia	Sawdust	-	Low
Pembalakan Canang Tongkat	07-01(P) 02-23	Kelantan Malaysia	Sawdust	-	Low
YAM Tengku Azlan Ibni Sultan Abu Bakar	CL-01-10-22(KP)(P)	Pahang Malaysia	Sawdust	-	Low
Amanah Saham Pahang Berhad	CJ-01-19-19(KP)(P)	Pahang Malaysia	Sawdust	-	Low
Wangsamakmur Holdings (M) Sdn Bhd	CR-02-9-21(KP/K)	Pahang Malaysia	Sawdust	-	Low
MPKKOA Orang Asli Kuala Koyan	CL-01-6-22(KP)(P)	Pahang Malaysia	Sawdust	-	Low

Note: *The GFS risk evaluation is based on by-products of sawmilling that its lifecycle completed and would otherwise have been discarded.

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WOOD TRACKING PROGRAM

Highlights of Assessment

1.0 Legal Requirements

Yoltan Corporation (Pahang) Sdn. Bhd. (YCP) is registered under the SSM in Kuala Lumpur, Malaysia and the factory is based in Pahang, Malaysia, YCP maintains records of the company registration, trading licenses, export license, wood briquette manufacture license and license payments are up to date. There was no evidence of non-compliance with legal requirements.

The factory has adequate safety and protective equipment to support workers. However, the factory is not equipped with fire extinguishers. According to the Management Representative, hose reels are sufficient for fire prevention since they do not use chemicals in the factory.

2.0 Documented Policy & Procedures

YCP has a Policy Statement on legal compliance and environmental protection and formal procedures on purchasing, production control and sales as appropriate to comply with the policy.

YCP has a documented CoC procedure that includes Purchasing, Administration, Production Control, Sales & Export of products based on Verified Legal status of raw materials and products.

July 2023: Observation 001-2023 - Checklist 2.1.2

YCP has yet to make the policy statement publicly available through the company's website.

3.0 Organisation & Training

YCP has management structure with a management representative to control and implement the CoC system. YCP key personnel (purchasing, CoC MR, sales) demonstrated an understanding of the CoC system and procedures.

July 2023: Gap 001/2023 (minor) – Checklist 3.2.1

YCP has yet to conduct training on the new Chain of Custody system.

4.0 Purchasing, Importing & Receiving

YCP has a formal system for purchasing, receiving and recording of raw materials and products from approved suppliers based on a Risk Assessment that defined sawdust as low risk materials and products. Charcoal Briquettes are manufactured using sawdust that are classified as by-products of sawmilling that has completed its lifecycle and would otherwise have been discarded, thus low risk material.

Sawmill suppliers maintain records of receiving timber harvested under licenses where logs are numbered and transported using a Removal Pass issued from Pahang Forestry Department in Malaysia. Sawdust used in the manufacture of charcoal are Light Red Meranti (*Rubroshorea spp*) which are not listed under CITIES.

5.0 Process Controls for Manufacturing

YCP maintained a clear system for planning, identification, control and recording of verified legal raw materials allocated to production through finished goods in respect of the buyer's requirements.

July 2023: Gap 002/2023 (minor) – Criterion 5.4

YCP has not physically identified pallets of briquettes with a pallet note (stock card) and batch unit # for August production as per the CoC procedure.

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6.0 Sales, Exports & Customs
YCP maintained a clear system for identification, control of verified legal products manufactured and purchased for sale and export to buyers and comply with national regulations.

7.0 Summary Records & Data
YCP maintained a clear system for documenting and maintaining records of Verified Legal materials purchased, issued into production, finished goods manufactured and products for sale to buyers. YCP has monthly records of purchases and sales of VL products. Records are kept for 7 years.

Summary results:
(Major Gap = 0 / Minor Gap = 2 / Observation = 1)

GAPs				
GAP #	Type	Checklist	Status	Description
001/2023	minor	3.2.1	New	July 2023: YCP has yet to conduct training on the newly developed Chain of Custody System
002/2023	minor	5.4	New	July 2023: YCP has not physically identified pallets of briquettes with a pallet note (stock card) and batch unit # for August production as per the CoC procedure.


**Note: Major Gap = Non-Compliance / Minor Gap = Minor Gap raised can be upgraded to a Major Gap if not adequately addressed by the date of the next surveillance visit.*

Observations		
Obs #	Checklist	Description
001-2023	2.1.2	July 2023: YPC has yet to make the policy statement publicly available through the company's website.

**Note: Observation raised can be upgraded to a Minor Gap if not adequately addressed by the date of the next surveillance visit.*

Highlights of Close out visit (if applicable)	Date: -
Not applicable	

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<h3>Recommendations</h3>
<p>BTN Distributors Limited [Yoltan Corporation (Pahang) Sdn. Bhd.] has demonstrated compliance with the Wood Tracking Program requirements (GFS-WI-006-WTP.3) and is recommended to receive a Statement of Compliance.</p> <p>Gap(s)/Observation(s) identified in this assessment should be addressed before the next surveillance visit. Action required to close the gap(s)/observation(s) include:</p> <p>Gap 001/2023 (minor) – Checklist 3.2.1: YCP shall conduct training on the Chain of Custody procedures and system for workers and maintain records.</p> <p>Gap 002/2023 (minor) – Criterion 5.4: YPC shall identify the monthly batch number with environmental status on pallets of finished products as per the CoC procedures.</p> <p>Observation 001-2023 - Checklist 2.1.2: YPC shall make the policy statement publicly available through the company’s website.</p> <p>The next surveillance visit is scheduled for July 2024.</p>

<h3>End of Summary Report</h3>

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