



**Public Summary of DDS  
FSC Controlled Wood  
based on FSC-STD-40-005 V 3-1**

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<b>FSC Controlled Wood code</b>	TT-CW-004061
<b>Date of “Public Summary of DDS</b>	11.03.2019
<b>Wood species covered with this assessment</b>	Poplar (Populus L.)
<b>District of Origin</b>	Industrial Plantations Denizli - Turkey
<b>Supply Area</b>	Yuvakoy – Civril - Denizli
<b>Contact information for complaints</b>	Ozlem Yılmaz - <a href="mailto:ozlem@yongamobilya.com">ozlem@yongamobilya.com</a> – Purchasing Manager
<b>Procedure for filing complaints</b>	Send e-mail to <a href="mailto:ozlem@yongamobilya.com">ozlem@yongamobilya.com</a> for complaints. We will evaluate the complaints according to our Non-conforming product and complaints instruction and Preventive and Corrective Action Procedure and record to Non-conforming Form. We will inform the owner of complaints in 2 weeks.
<b>Reference Document</b>	FSC-CNRA-TR V1-0 EN - Centralized National Risk Assessment for Turkey
<b>Certification Body</b>	BM Trada
<b>Address</b>	Chiltern House Stocking Lane, Hughenden Valley High Wycombe Buckinghamshire, HP14 4ND - United Kingdom

CATEGORY/FSC INDICATOR	RISK DESIGNATION AND DETERMINATION	RISK DESIGNATION	CONTROL MEASURE	RESULT
<b>1. Illegally harvested wood</b>				
1.1 Land tenure and management rights	<p>Risk conclusion This indicator has been evaluated as specified risk for private forests. Ownership conflict when private natural and degraded forest area is bordering state forest. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p> <p>This indicator has been evaluated as low risk for state forests and public forests. Threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities/or by the relevant entities.</p>	<p>Low risk for state and public forest Specified risk for private forest</p>	<p>In Turkey, plantations of poplar, other fast growing tree species, and industrial forest plantations are established in first class agricultural lands according to the Afforestation Regulation, and the Afforestation Circular.</p> <p>Farmer has Land register record confirm the ownership of property deed.</p> <p>Yonga Mobilya check the property deed for each supply from Farmer.</p>	<b>Low risk</b>
1.2 Concession licenses	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
1.3 Management and harvesting planning	<p>Risk conclusion This indicator has been evaluated as low risk. Threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities/or by the relevant entities.</p>	<b>Low risk</b>	<b>N/A</b>	<b>Low risk</b>
1.4 Harvesting permits	<p>Risk conclusion This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>	<b>Specified risk</b>	<p>In Turkey, plantations of poplar, other fast growing tree species, and industrial forest plantations are established in first class agricultural lands according to the Afforestation Regulation, and the Afforestation Circular.</p> <p>Poplar plantations are established and managed on the state and private lands by private enterprises. Production in these plantations is done in short rotation (10-12</p>	<b>N/A</b>

			<p>years for poplar) and the land is re-afforested after harvesting.</p> <p>Since no permits are required for felling or logging of plantation poplar, there can be no claim of illegal harvesting. No such records have been found.</p> <p><a href="https://www.ogm.gov.tr/lang/en/SitePages/OGM/OGMDefault.aspx">https://www.ogm.gov.tr/lang/en/SitePages/OGM/OGMDefault.aspx</a></p> <p><a href="http://www.kavak.gov.tr/english.html">http://www.kavak.gov.tr/english.html</a></p>	
1.5 Payment of royalties and harvesting fees	<p>Risk conclusion</p> <p>This indicator has been evaluated as low risk for state forest. Threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities/or by the relevant entities.</p> <p>N/A for private and public forests.</p>	<p>Low risk for state forest</p> <p>N/A for private and public forest</p>	N/A	N/A
1.6 Value added taxes and other sales taxes	<p>Risk conclusion</p> <p>This indicator has been evaluated specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>	<b>Specified risk</b>	<p>The owners of these poplar plantations sell their produce to poplar dealers as round wood or standing tree. Poplar dealers purchase the products by producer receipt and keep PTT or bank statement documents. Poplar dealers then sell the products to the various forest industries (furniture, panels, packaging etc.). These industrial firms purchase the products with invoice and freight bill. The firms present required invoices and other tax payment documents upon request.</p> <p>Also, saw mill Yılmaz Kereste pay the taxes and other sales taxes. Yonga Mobilya request all taxes information from Yılmaz Kereste for each supply.</p>	<b>Low Risk</b>
1.7 Income profit taxes	<p>Risk conclusion</p> <p>This indicator has been evaluated as specified risk for private forest. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>	<p>Low risk for state and public forest</p> <p>Specified risk for private forest</p>	<p>According to Turkish legislation saw mill Yılmaz Kereste should pay required taxes. Yonga Mobilya request receipt, invoice, delivery note (between Yılmaz Kereste and Farmer) information from Yılmaz Kereste for each supply.</p>	<b>Low Risk</b>

	Low risk for state forest and public forest Threshold (1) is met: Identified laws are upheld. Cases where laws/ regulations are violated are efficiently followed up via preventive actions are taken by the authorities and/or by the relevant entities.			
1.8 Timber harvesting regulations	Risk conclusion This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.	<b>Specified risk</b>	Felling and bucking are done by the sawmills and as in other agricultural crops, are exempt from all official permissions. Current legislations does not include harvesting regulation for plantations. Yonga works for long years (10 years) with sawmill Yılmaz Kereste. Yılmaz Kereste is a partnership company. They have exprinces about harvesting of poplar. If, Yonga Mobilya will work with different sawmill, experience of the company will check.	<b>Low risk</b>
1.9 Protected sites and species	Risk conclusion Protected areas. This indicator has been evaluated as low risk. Threshold (1) is met: Identified laws are upheld. Cases where laws/ regulations are violated are efficiently followed up via preventive actions are taken by the authorities and/or by the relevant entities. Forests outside protected areas This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.	Low risk for protected areas Specified risk for forests outside protected areas	Poplar plantations are not in forest area. Poplar plantations are private propriety and agricultural area.	<b>N/A</b>
1.10 Environmental requirements	Risk conclusion This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.	<b>Specified risk</b>	Every year audit is done to the poplar lands by saw mill and Yonga Mobilya to verify the environmental requirements are in place. The firms present required photos and reports upon request. As the poplar plantations areas private owned, they take into account environmental measures. There is no environmental legislation for plantation areas. Poplar plantations are not in forest area. Poplar plantations are private propriety and agricultural area.	<b>N/A</b>

1.11 Health and safety	<p>Risk conclusion This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>	<b>Specified risk</b>	<p>Site verification was done by Yonga in the Yılmaz Kereste working area at 04.03.2019. And, stakeholder consultation was done by Yonga.</p> <p>Also, in Turkey, there is “occupational health and safety legislation – number 6331”. According to this legislation, companies work under the independent H&amp;S expert.</p> <p>All safety and health regulations are followed, and all required safety equipment is used by saw mill during harvesting. Felling and bucking are done by the saw mill Yılmaz Kereste. Saw mill has own occupational health and safety expert and training reports and risk assessment shall be presented upon request.</p>	<b>Low risk</b>
1.12 Legal employment	<p>Risk conclusion Specified risk. This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>	<b>Specified risk</b>	<p>In farm land plantation forest, farmer works on the field. According to the law on Social Security, they do not need to pay social security for them and they do not need to have a labour contract. Also, Poplar cultivation does not require continuous work.</p> <p>The saw mill Yılmaz Kereste workers have the Social security payments and related documents available.</p>	<b>Low risk</b>
1.13 Customary rights	<p>Risk conclusion This indicator has been evaluated as specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>	<b>Specified risk</b>	<p>Poplar plantations are not in forest area. Poplar plantations are private propriety and agricultural area.</p>	<b>N/A</b>
1.14 Free prior and informed consent	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
1.15 Indigenous peoples rights	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
1.16 Classification of species quantities, qualities	<p>Risk conclusion Low risk. Threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>	<b>Low risk</b>	<b>N/A</b>	<b>Low risk</b>

1.17 Trade and transport	<p>Risk conclusion Specified risk. Threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>	<p><b>Specified risk</b></p>	<p>99% of Turkish Forests are State owned. As such, forest management, planning and harvesting are done by the State Forestry Department (SFD). There is no Harvesting licence available since all harvesting is done by the SFD. Proof of legality is the "Forest Dispatch Document" provided by the local division of the SFD for each shipment of logs from the forest. No shipment is allowed if the carrier does not have this document. This is adequate proof of legality according to Turkish Law and conforms to EU Regulations.</p> <p>All supply chain records are accessible for each delivery.</p> <p>Each supply chain records include;</p> <ul style="list-style-type: none"> <li>- Purchase Order Form of Yonga to Yılmaz Kereste</li> <li>- Producer (Yılmaz Kereste) Receipt to Farmer</li> <li>- Delivery Note of Yılmaz Kereste to Yonga</li> <li>- Invoice of Yılmaz Kereste to Yonga</li> <li>- Payment Receipt to Yılmaz Kereste</li> <li>- Tax Registration Certificate of Yılmaz Kereste</li> <li>- Social security institution (ssi) record of Yılmaz Kereste – there are shown the workers of Yılmaz Kereste</li> <li>- Land certificate issued by government of farmer.</li> </ul>	<p><b>Low risk</b></p>
1.18 Offshore trading and transfer pricing	<p>Risk conclusion Low risk. Threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>	<p><b>Low risk</b></p>	<p>N/A</p>	<p><b>Low risk</b></p>
1.19 Custom regulations	<p>Risk conclusion Low risk. Threshold (1) is met: Identified laws are upheld. Cases where laws/ regulations are violated are efficiently followed up via preventive actions are taken by the authorities and/or by the relevant entities.</p>	<p><b>Low risk</b></p>	<p>N/A</p>	<p><b>Low risk</b></p>

1.20 CITES	Risk conclusion Low risk. Threshold (1) is met: Identified laws are upheld. Cases where laws/ regulations are violated are efficiently followed up via preventive actions are taken by the authorities and/or by the relevant entities.	<b>Low risk</b>	N/A	<b>Low risk</b>
1.21 Legislation requiring due diligence/ due care procedures	N/A	N/A	N/A	N/A
<b>2. Wood harvested in violation of traditional and human rights</b>				
<b>CATEGORY/FSC INDICATOR</b>	<b>RISK DESIGNATION AND DETERMINATION</b>	<b>RISK DESIGNATION</b>	<b>CONTROL MEASURE</b>	<b>RESULT</b>
2.1. The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.	Low risk Justification: All low risk thresholds (1, 2, 3, 4 and 5) are met. None of the specified risk thresholds are met.	<b>Low risk</b>	N/A	<b>Low risk</b>
2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.	Specified risk on violation of freedom of association and right to collective bargaining and on gender wage discrimination. Justification: Specified risk threshold 15 applies for these aspects. Low risk on child labour, forced labour and other forms of discrimination. Justification: Low risk threshold 10 applies for these aspects.	Specified risk for rights to freedom of association and to collective bargaining and on gender wage discrimination Low risk on child labour, forced labour and other forms of discrimination	Site verification was done by Yonga in the Yılmaz Kereste working area at 04.03.2019  And, stakeholder consultation was done by Yonga. Also, in Turkey, there is “occupational health and safety legislation – number 6331”. According to this legislation, companies work under the independent H&S expert. Yonga contact to H&S expert of Yılmaz Kereste and ask about Yılmaz Kereste.  Another stakeholder consultation with local authority of village Yuvakoy.  Another stakeholder; “provincial directorate of labor and social security – Denizli”  Stakeholder consultation techniques were face to face meeting. According to site verification and stakeholder consultation, there is no evidence of child labor. Because this, indicator defined as; low risk	<b>Low risk</b>

2.3. The rights of Indigenous and Traditional Peoples are upheld.	Low risk for rest of the country Justification: Low risk thresholds 16 and 21 are met.	<b>Low risk</b>	---	<b>Low risk</b>
<b>3. Wood from forests where high conservation values are threatened by management activities</b>				
<b>CATEGORY/FSC INDICATOR</b>	<b>RISK DESIGNATION AND DETERMINATION</b>	<b>RISK DESIGNATION</b>	<b>CONTROL MEASURE</b>	<b>RESULT</b>
<b>3.0 HCV'</b>	Low risk. Threshold (1) and (2) is met. Data available are sufficient for determining HCV presence within the area under assessment; AND Data available are sufficient for assessing threats to HCVs caused by forest management activities.	<b>Low risk</b>	N/A	<b>Low risk</b>
<b>3.1 HCV 1</b>	Specified risk Natural forests Threshold (8) is met: HCV 1 is identified and/or its occurrence is likely in the area under assessment and it is threatened by management activities. Low risk Plantation Threshold (5) is met: There is no HCV 1 identified in the area under assessment and its occurrence is unlikely.	Low risk for plantation Specified risk for natural forest	N/A	<b>Low risk</b>
<b>3.2 HCV 2</b>	Specified risk. Natural forest Threshold (12) is met: HCV 2 is identified and/or its occurrence is likely in the area under assessment, and it is threatened by management activities. Low risk Plantation Threshold (9) is met. There is no HCV2 identified and its occurrence is unlikely in the area under assessment.	Low risk for plantation Specified risk for natural forest	N/A	<b>Low risk</b>
<b>3.3 HCV 3</b>	Specified risk. Natural forest Threshold (17) HCV 3 is identified and/or its occurrence is likely in the area under assessment and it is threatened by forest management activities. Low risk Plantation	Low risk for plantation Specified risk for natural forest	N/A	<b>Low risk</b>



	Threshold (13) is met: There is no HCV 3 identified and its occurrence is unlikely in the area under assessment.			
<b>3.4 HCV 4</b>	Specified risk. Production forest (Natural forest and plantation forest) Threshold (22) is met: HCV 4 areas are identified in and/or its occurrence is likely in the area under assessment, and it is threatened by management activities. Low risk. Protected forest Threshold (20) is met. There is low/negligible threat to HCV 4 caused by management activities in the area under assessment.	Low risk for protected forest Specified risk for production forest (natural forest and plantation)	Poplar plantations are not in forest area. Poplar plantations are private propriety and agricultural area.	<b>N/A</b>
<b>3.5 HCV 5</b>	Specified risk. Natural forest. Threshold (26) is met: HCV 5 is identified and/or its occurrence is likely in the area under assessment and these areas are threatened by management activities. Low Risk Plantation Threshold (23) is met: There is no HCV 5 identified and its occurrence is unlikely in the area under assessment.	Low risk for plantation Specified risk for natural forest	<b>N/A</b>	<b>Low risk</b>
<b>3.6 HCV 6</b>	Low Risk. Threshold (29) is met: HCV 6 is identified and/or its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by management activities	<b>Low risk</b>	<b>N/A</b>	<b>Low risk</b>
<b>4. Wood from forests being converted to plantations or non-forest use</b>				
4.1 Conversion of natural forests to plantations or non-forest use in the area under assessment is less than 0.02% or 5000 hectares average net annual loss for the past 5 years (whichever is less), OR Conversion is illegal at the national or regional level on public and private	Risk designation: Low risk. Thresholds (1) and (3) are met: (1) Thresholds provided in the indicator are not exceeded. AND (3) Other available evidence does not challenge a 'low risk' designation.	<b>Low risk</b>	<b>N/A</b>	<b>Low risk</b>

land.				
<b>5. Wood from forests in which genetically modified trees are planted</b>				
<b>5.1</b>	<p>Low risk  The following thresholds are met:  (2) There is no commercial use of GM tree species in the area under assessment, AND  (3) Other available evidence does not challenge 'low risk' designation.  GMO can be allowed under the Law on Biosecurity. A Permit is required for the use of GMO plants, animals etc. for research, trade, import, export, etc. purposes. The applicant shall require a permit from a special control board.  Currently, there are no permits issued for commercial timber, and no indication of illegal use of GMO trees.</p>	<b>Low risk</b>	<b>N/A</b>	<b>Low risk</b>