



Responsible Paper and Board Sourcing: Fibre Testing Policy

January 2021

This document outlines the DK paper and board fibre testing policy. It complements the DK Sustainable Sourcing Policy which states that we source only papers that have been risk assessed and are from known, legal and responsible sources.

WHAT IS FIBRE TESTING?

Fibre testing is a method of identifying and quantifying the mix of tree fibres contained in a sample of paper or board and can determine whether controversial fibres are present. Using high-power microscopes, specialised labs identify the composition of a sample of paper by observing the reactions of fibres when treated with various chemicals (e.g., change in colour) and by identifying unique anatomical features (e.g., shape, size, pit pattern). Depending on the quality of the fibres, experts can determine the pulp type (softwood vs. hardwood), pulping process (e.g., mechanical, chemical), the genus, and sometimes the species of the tree fibres contained in a paper sample, allowing for the identification of controversial fibres should they be present.

WHY DO WE FIBRE TEST?

We require our printers and paper suppliers to avoid controversial fibre. This can be defined as wood pulp derived from endangered or conflicted habitats, high carbon stock sources, or where the harvesting of trees negatively impacts local biodiversity, local communities or indigenous peoples or violates human rights. By performing regular fibre analysis of papers used in our final products we ensure:

VERIFICATION

- Fibre testing allows us to check and verify our supplier's chain of custody to identify if they have used materials in our finished products that match those requested on our Purchase Order.
- Obtain independent third-party verification of our chain of custody process, and that of our suppliers.

DUE DILIGENCE

- Fibre testing is an appropriate test of our paper purchasing system and that of our suppliers. It allows us to diligently check that paper and board has been accurately sourced and utilised within our supply chain.
- Due diligence is encouraged under laws such as the Lacey Act and EU Timber Regulation (EUTR).

APPROPRIATE ACTION

- Where test results show irregularities or non-conformities we can enact our investigation process with the supplier and/or the Forest Stewardship Council ® (FSC® if relevant to the material), and take appropriate follow up action with our suppliers.

WHAT DO WE TEST?

Our fibre testing policy focuses on higher risk areas of paper sourcing and usage based on the following criteria:

- Products made with materials from geographic regions at high risk of transshipment of paper and pulp or deforestation.
- Products made with materials which may include species featured on CITES or the IUCN Red List or are certified by a valid FSC, PEFC, FSC CW, or VLC certificate but originate from countries assessed as high risk.
- A high volume of the material used in our products.
- The material is used in products containing license partners' branding.

Each year we aim to test up to 12 substrates from qualifying categories (covering a mix of text, endpapers and cover stocks).



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HOW DO WE TEST?

All testing is performed by an independent third party, fully accredited specialist testing facility. Printed product samples are sent to the testing facility who will perform testing and present a report documenting the findings. The testing house employs the TAPPI T401 om- 08 testing protocol for fibre analysis. We then compare the findings with our records of fibre sources for each specific brand to check that they match.

PROCESS RECORDS AND DOCUMENTATION

- Regular paper usage reports are run to check and measure the type and volume of papers and boards that we are using. The DK Responsible Sourcing Policy can be found [here](#).
- Suppliers are required to maintain fibre composition records of the paper and boards they supply to ensure traceability.
- When a substrate is identified for fibre testing, we keep records of the reason for testing, product title and ISBN, schedule (when materials are tested and results due) analysis report and any resulting actions/investigation required.
- Records are stored securely for a 10 year period.

RESPONSIBILITIES AND REVIEW

Overall responsibility for this Policy resides with DK's Chief Operating Officer. We are committed to reviewing this policy regularly to ensure that it maintains compliance to evolving legal obligations as well as our high sustainability standards.

The latest version of this policy will always be found on our website at:

<https://www.dk.com/uk/information/our-green-pledge/>