



Confederation of European Paper Industries (CEPI)

Auditor's report on the limited review performed on the Data Quality Rating method of a selection of core indicators published in the document "2019 Annual Statistics", "2018 Environment Statistics" and the most important figures summarized in the "Key Statistics" of the Confederation of European Paper Industries (Hereafter "CEPI")

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To the Board of Directors,

We have been engaged by the Confederation of European Paper Industries ("CEPI") to issue a limited assurance statement on the Data Quality Rating method CEPI applies on a selection of core indicators published in the "2019 CEPI annual statistics report", "2018 Environment Statistics report" and the "Key Statistics Report", being a summarizing public report in which the most relevant indicators are published. The core indicators covered by our assurance statement and the detailed Data Quality Rating made by CEPI can be retrieved in Appendix 1 to our Assurance Statement. The Data Quality Rating method applied by CEPI is based on Product Footprint Category Rules (PFCR) for paper, developed by the European Commission's DG Environment (see Appendix 2 to our Assurance Statement).

Limitations in our scope

The scope of our assurance engagement as described above does not include an assessment of the selected indicators nor the reliability of the underlying data provided to CEPI by the National Associations, from individual companies or based on estimates provided by paper industry consultants.

Management's Responsibility

The management of CEPI is responsible for the preparation of the indicators and their data quality assessment based on the information received directly from the National Associations, from individual companies or based on estimates provided by paper industry consultants.

The Auditor's Responsibility

As defined by the International Federation of Accountants ("IFAC"), our review was designed to obtain a limited level of assurance. Procedures to obtain limited level of assurance are less extensive in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks, than those for a reasonable level of assurance and therefore less assurance is provided.

Our responsibility is, based on our limited assurance review procedures, to express an independent conclusion on the Data Quality Rating method applied by CEPI. Our assurance report has been made in accordance with the terms of our engagement letter and the international standard as defined in ISAE 3000 (International Standard for Assurance Engagements). With respect to independence rules, these are defined by the respective legal and regulatory texts as well as by the professional code of ethics, issued by the IFAC.

Nature and scope of our engagement

We planned and performed the procedures deemed necessary for expressing a limited assurance on the fact that the Data Quality Rating method applied by CEPI is not materially misstated. A limited assurance engagement provides less assurance than an audit.

We performed the following procedures to support our conclusion:

- J Obtaining an understanding of the Data Quality Rating formula and assessment of the suitability of the applied methodology by CEPI. CEPI considers separately the Data Delivery Quality Rating (DDQR) to assess the quality of data delivery by the National Associations towards CEPI, as well as the Data Quality Rating (DQR) to assess the quality of the statistical data itself. Both rating methods have been explained in further detail in Appendix 2 to this Assurance Statement.
- J Challenging the Data Quality Rating made by CEPI at consolidated level. Both DDQR and DQR methods have been challenged throughout our procedures.

The DDQR ratings are based on four criteria:

- o Completeness (C), has been checked by verifying if all the figures have been sent by the National Associations and whether the appropriate action has been taken in case of a lack of figures from a National Association.
- o Time-related representativeness (TiR), has been checked by verifying if the received figures related to the appropriate reporting year and if, in case of extrapolation, the correct quality assumption has been systematically performed.
- o Geographical representativeness (GR), has been checked by reviewing the weighing factor used for the various members according to the CEPI assumption.
- o Parameter uncertainty (P2), has been checked by verifying the consolidation of the figures sent by the National Associations in the CEPI reporting and, in case of difference or assessment by CEPI, by checking the impact on the Data Delivery Quality Rating performed by CEPI.

The DQR ratings are based on the following criteria as they are defined :

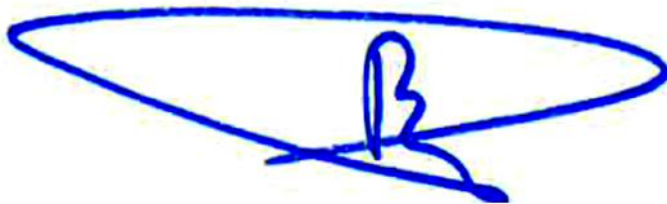
- o Parameter uncertainty (P1), has been checked by verifying the consolidation of the figures sent by the National Associations in the CEPI reporting and, in case of modification by CEPI, by checking the impact on the Data Quality Rating performed by CEPI.
-) Assessing the adequacy of the documentation and "audit trail".
-) Conducting interviews with 5 selected National Associations, mainly for the purpose of assessing their Data Quality Rating Method applied and verifying whether the CEPI methodology was properly followed.
-) Conducting interviews with CEPI responsible company staff, mainly for the purpose of assessing the understanding of the Data Quality Rating methodology and assumptions made by CEPI.

Conclusion

Based on our limited review for the core indicators in scope, as detailed in Appendix 1, nothing has come to our attention that causes us to believe that the Data Quality Rating method performed by CEPI, based on the European methodology for the calculation of environmental footprints of products, has not been done in line with the defined CEPI procedures.

Zaventem, 17 July 2020.

The auditor,



Deloitte Bedrijfsrevisoren SCRL / Réviseurs d'Enterprises CVBA
Represented by Pierre-Hugues Bonnefoy

Appendix 1: Overview core indicators in scope with their DDQR and DQR rating

Appendix 2: CEPI Data Quality Rating methodology

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Appendix 1: Overview core indicators in scope with their DQR and DDQR rating

	DQR		DDQR	
Industry Structure (2019)				
Number of companies	1,0	Excellent Quality	1,3	Very Good Quality
Number of pulp mills	1,0	Excellent Quality	1,0	Excellent Quality
Number of paper & board (P&B) mills	1,0	Excellent Quality	1,3	Very Good Quality
Number of paper machines	2,0	Very Good Quality	1,8	Very Good Quality
Paper & board capacity	3,0	Good Quality	1,8	Very Good Quality
Pulp capacity	2,0	Very Good Quality	1,8	Very Good Quality
Paper & board production	1,0	Excellent Quality	1,0	Excellent Quality
Market pulp production	1,0	Excellent Quality	1,5	Very Good Quality
Paper & board consumption	2,0	Very Good Quality	1,5	Very Good Quality
Pulp consumption	1,0	Excellent Quality	1,3	Very Good Quality
Paper & board exports	1,0	Excellent Quality	1,0	Excellent Quality
Pulp exports	1,0	Excellent Quality	1,0	Excellent Quality
Paper & board imports	2,0	Very Good Quality	1,5	Very Good Quality
Pulp imports	2,0	Very Good Quality	1,3	Very Good Quality
Employment	3,0	Good Quality	3,0	Good Quality
Turnover	3,0	Good Quality	3,5	Fair Quality
Raw Materials (2019)				
Wood consumption	1,0	Excellent Quality	1,3	Very Good Quality
Collection of Paper for Recycling	3,0	Good Quality	1,5	Very Good Quality
Utilisation of Paper for Recycling	1,0	Excellent Quality	1,3	Very Good Quality
Utilisation of Paper for Recycling by sector	2,0	Very Good Quality	1,5	Very Good Quality
Exports of Paper for Recycling	2,0	Very Good Quality	1,3	Very Good Quality
Imports of Paper for Recycling	2,0	Very Good Quality	1,5	Very Good Quality
Non-fibrous materials consumption	2,0	Very Good Quality	1,8	Very Good Quality
Environmental data (2018)				
Fuels consumption	2,0	Very Good Quality	2,8	Good Quality
Electricity consumption	3,0	Good Quality	3,0	Good Quality
Electricity production from CHP	3,0	Good Quality	3,5	Fair Quality
Biomass Utilisation	3,0	Good Quality	3,3	Fair Quality
SO2 Emissions	3,0	Good Quality	2,5	Good Quality
NOx Emissions	3,0	Good Quality	3,0	Good Quality
Water intake	3,0	Good Quality	3,5	Fair Quality
COD Emissions	3,0	Good Quality	3,5	Fair Quality
AOX Emissions	3,0	Good Quality	3,3	Fair Quality
Residues Landfilled	3,0	Good Quality	3,0	Good Quality
EMS certification	2,0	Very Good Quality	3,0	Good Quality
Social data (2018)				
Accidents	1,0	Excellent Quality	1,0	Excellent Quality

DQR = Data Quality Rating

DDQR = Data Delivery Quality Rating

Appendix 2: CEPI Data Quality Rating methodology

The European methodology for the calculation of environmental footprints of products has been altered to be used as a quality assessment tool on a larger variety of indicators than only environmental footprint indicators. CEPI has decided to remove the following two parameters: (i) Technological representativeness and (ii) the Methodological appropriateness and to split the Data Quality Rating methodology in 1) Data Delivery Quality (DDQR: assessment of the quality of data delivery by the National Associations towards CEPI) and 2) Data Quality Rating (DQR: assessment of the quality of the statistical data published towards stakeholders).

CEPI Data Delivery Quality Rating formula:

$$DDQR = \frac{GR + TiR + C + P2}{4}$$

C - Completeness

The completeness is calculated as follows: figures that have not been received by the National Associations are deleted from the total to obtain a total B.

The percentage of this total B compared to the total is considered:

- 90% = 1
- 80% and < 90% = 2
- 70% and < 80% = 3
- 50% and < 70% = 4
- < 50% = 5

TiR - Time related representativeness

Annual figures reported to CEPI by the National Associations are one year old. When a figure is estimated by CEPI or the National Association, the age of the basis year for estimation is considered (2 years, 3 years, etc...). A total B is calculated by multiplying for each country the data figure received with the "year number".

The ratio between total B and total is considered:

- 1 = 1
- 2 and > 1 = 2
- 3 and > 2 = 3
- 4 and > 3 = 4
- > 4 = 5

GR - Geographical representativeness

The geographical representativeness is calculated as follows: geographical representativeness is considering paper & board production + market pulp production for each country. Paper & board production + market pulp production of countries without any figure received is deleted from the total to obtain a total B.

The percentage of this total B compared to the total is considered:

- 95% = 1
- 85% and < 95% = 2
- 75% and < 85% = 3
- 50% and < 75% = 4
- < 50% = 5

P2 - Parameter uncertainty

Through a survey, the National Associations have provided CEPI with a "reliability factor" for each core data: (1) high - (2) satisfactory - (3) can be further improved - (4) low – (5) no data received, indicating the quality of data reported by the Producers to the National Associations.

Figures to be estimated or overruled by CEPI are given factor (5) by default.

A total B is calculated by multiplying for each country the data figure received with a specific percentage for each factor: (1) = 100% - (2) = 75% - (3) = 50% (4) = 25% and (5) = 10%.

The percentage of this total B compared to the total is considered:

- 90% = 1
- 80% and < 90% = 2
- 70% and < 80% = 3
- 50% and < 70% = 4
- < 50% = 5

CEPI Data Quality Rating formula:

$$DQR = P1$$

P1- Parameter uncertainty

Through a survey, the National Associations have provided CEPI with a "reliability factor" for each core data: (1) high - (2) satisfactory - (3) can be further improved - (4) low, indicating the quality of data reported by the Producers to the National Associations.

To ensure the 'P1' parameter is used here to measure Data Quality towards stakeholders, in case CEPI decided to estimate itself or overrule the figure received from the National Associations to make it more qualitative, CEPI makes itself an assessment of a "reliability factor" for the data they enter: (1) high - (2) satisfactory - (3) can be further improved - (4) low. Scores (1) - (4) should be attributed based on the reliability of the source.

Corresponding guidance has been drawn up:

- (1) Not possible in case CEPI needs to complete or estimate the data itself based on alternative sources.
- (2) The data has not been estimated by CEPI itself but has been found through others sources (Companies data, Eurostat, RISI mill database) and refers to the current year.
- (3) The data has been estimated by CEPI based on data received from the National Associations relating to the last 3 years OR based on relevant data found through other sources on the previous year, AND takes into account the trends in production and other KPIs within the country.
- (4) The data has been estimated by CEPI based on data received from the National Associations which is older than relating to the last 3 years OR based on relevant data found through other sources which is older than the previous year OR the data of previous year(s) received from the National Associations has just been re-used without investigating trends in production and other KPIs OR any other estimation or data has been used.

A total B is calculated by multiplying for each country the data figure received with a specific percentage for each factor: (1) = 100% - (2) = 75% - (3) = 50% and (4) = 25%

The percentage of this total B compared to the total is considered:

- 90% = 1
- 80% and < 90% = 2
- 70% and < 80% = 3
- 50% and < 70% = 4
- < 50% = 5

In this approach 'P1' is used differently than 'P2' for Data Delivery Quality. It provides a real indication of the quality of data reported towards stakeholders and takes into account partly time-related representativeness (TiR) (score depends partly on recentness of data) and geographical representativeness (GR) (score per country is multiplied with the data figure replied by the country).