FSC CERTIFICATION SYSTEM

CERTIFICATION PUBLIC REPORT

FOREST MANAGEMENT CERTIFICATION

Report finalisation date: 25 January 2013

Comptoir des Bois de Brive (CBB)

Location of forest(s): France
Manager’s address:
17 avenue Maillard –
Postal Code 19104 - City: Brive Cedex - Country: France

Contact person: Emmanuel Ripout (emmanuel.ripout@ipaper.com)

BUREAU VERITAS CERTIFICATION

60 avenue du Général de Gaulle - 92046 Paris - La Défense Cedex - FRANCE
Tel: + 33 1 41 97 02 05 - Fax: + 33 1 41 97 02 04
www.bureauveritas.fr/certification
Contact person: Hervé Moinecourt (herve.moinecourt@fr.bureauveritas.com)

Date of initial audit: 5-9 December 2011
Certificate registration code: BV-FM/COC-011160 - Certification date: 21/02/2012
Document ref.: PR120105FR version 3.1
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1 - Introduction

Headquartered at Brives, CBB, is the forestry branch of Paper SA, an international group. It has 70 employees and a turnover of 61 million euros.

CBB holds exclusive rights for timber supply to Célimo, a paper pulp factory in Saillat, Haute Vienne. Célimo accounts for 90% of CBB’s activity, the remaining 10% being for other primary processing industries.

In 2010, CBB supplied timber as follows:

- Saillat: 1.29 MT (of which 0.15 after processing);
- sawmills: 43 KT lumber;
- fuelwood: 21KT;
- other bioenergy industries: 37KT

The main purpose of CBB is to "supply timber to the Saillat International Paper factory and all its other customers on a sustainable basis, according to their requirements, while ensuring optimum outlets for all other forestry products".

Every year, CBB harvests about 1.5 million tons of timber in 20 districts of the Centre and West regions of France. To carry out its activities, CBB developed 2 different areas of work:

- forest exploitation (16%);
- trade in logs (60%) and related sawmill products (24%).

The resources used by CBB to undertake its activities are presented in the table below:
## 2 - Description of the applicant forest entity

### 2.1 - General overview and identification

**Name of forest management company:** Comptoir des bois de Brive (CBB)

Address: 17 avenue Maillard  
Postal code: 19104  
City: Brive Cedex  
Country: France  
Legal status: Partnership  
Identification code: code  
Telephone: + 33 (0)5 55 92 73 92  
Facsimile: + 33 (0)5 55 92 73 80

E-mail: emmanuel.ripout@ipaper.com  
Web Site: http://www.comptoir-bois-brive.fr/  
**Number of employees:** 70

**Annual turnover:** 60 million euros

**President of managing company:**

---

### Table: CBB Operations

<table>
<thead>
<tr>
<th>Common Services</th>
<th>Logs Trading</th>
<th>RSP Trading</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CBB OPERATIONS</strong></td>
<td><strong>LOGS TRADING</strong></td>
<td><strong>RSP TRADING</strong></td>
</tr>
<tr>
<td><strong>COMMON SERVICES</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• General manager (1)</td>
<td>• Head (1)</td>
<td>• Sawmill technical support (1)</td>
</tr>
<tr>
<td>• Business support (6)</td>
<td>• Assistant (1)</td>
<td>• Acceptance of chips quality(2)</td>
</tr>
<tr>
<td>• HR (2.6)</td>
<td>• Purchaser (1)</td>
<td>• RSP trading (2)</td>
</tr>
<tr>
<td>• Accounting (3)</td>
<td></td>
<td>• Assistant (1)</td>
</tr>
<tr>
<td>• Logistics (4)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL 16.6</strong></td>
<td><strong>TOTAL 42</strong></td>
<td><strong>TOTAL 16.6</strong></td>
</tr>
</tbody>
</table>

| **SPECIFIC SERVICES** | | |
| • Head (1) | • Head (1) | • Sawmill technical support (1) |
| • Planning (1) | • Assistant (1) | • Acceptance of chips quality(2) |
| • Assistants (2) | • Purchaser (1) | • RSP trading (2) |
| • 7 sectors (22) | | • Assistant (1) |
| • Drivers (11) | | |
| • Logger (15) | | |
| **TOTAL 42** | **TOTAL 3** | **TOTAL 6** |

| **EQUIPMENT** | | |
| • Power-driven saws (3) | | |
| • Porters (4) | | |
| • Skidder (1) | | |
| **TOTAL 6** | | |

| **SUBCONTRACTORS** | | |
| • Carriers (100) account for 75 % tonnage | • Loggers (100) | • More than 600 timber owners every year |
| • 25 % tonnage is carried on own resources | • Off-road logging vehicles (65) | • Number of forestry cooperatives |
| • No rail transportation since 2007 | Sub contractors account for 80% of exploited volume | • 4 forestry cooperatives |
| | | • 120 forest companies |
| | | • 160 sawmills |

| **SUPPLIERS** | | |
| • More than 600 timber owners every year | • 4 forestry cooperatives | • 160 sawmills |
| • 420 forest companies | | |
| • 120 forest companies | | |
| • 160 sawmills | | |

| **SUPPLIED PRODUCTS (2010)** | | |
| • 145 KT of pulping | • 828 KT of pulping | • 358 KT of related sawmill products |
| • 43 KT of lumber | | |
| • 21 KT of fuel wood | | |
General manager of forest management company: Stéphane Corée (CBB GM)
Contact person (Head of FSC certification): Emmanuel Ripout
Head of FSC labelling: Emmanuel Ripout

Activity

Type of activity: 2 main activities:
- trade in logs and related sawmill products;
- forest exploitation: purchase of standing timber, logging and forest management support for small private holders.

The present forest certification concerns only the latter activity.

Detailed description of the company’s activities: CBB purchases standing, felled or roadside timber from private and public owners in about 20 districts of the Centre and West regions of France. It uses appropriate means (loggers, power-driven saws, porters and skidders). CBB uses about a hundred enterprises specialized in forestry works to conduct the bulk of its activities. CBB also manages the logistical aspects of transportation by truck from sites to the Saillat factory or to other customers in the case of carriage paid selling. CBB’s activities are organized per sectors (7 as of the audit date) that bear the name of the sector heads (CSE) in charge thereof (see §2.2). Sector heads are assisted by forestry technicians (TEF) whose numbers vary according to business volume.

CBB does not manage forests on its own behalf or on behalf of owners. Neither does it carry out reforestation after the cutting of trees.

Legal and corporate structure

CBB is a Partnership of which Chris Melia, Director of the Saillat IP factory is Administrator, and Stéphane Corée, the General Manager.

The legal form of the company is expected to have changed by 1st January 2012, whereby CBB will become a simplified limited company whose CEO will be Chris Melia, and Stéphane Corée, the General Manager.

CBB is organized as follows:
It is worth noting that CBB is ISO 9001, ISO 14001, PEFC and CW FSC-certified for its chain of custody. In addition, all timber procured by CBB and sold to Saillat fulfils the requirements of the Controlled Wood reference model.

Description of the legal ownership and user rights applicable to the audited forests and lands, including:

- summary of legal ownership and user rights (both legal and customary) of the different parties other than the certified company;

CBB does not own the private or public forests in which it operates. CBB harvests timber from the forest estates in which it operates. This activity is governed by a contract between the owner or his representative and CBB.

CBB mainstreams user rights in its activities (hiking trails, farm tracks, local practices, cultural sites, etc.).

- summary of non-forestry activities conducted in the audited forests, either by the certified company or any other party;

In private forests, such activities range from pasturing, bee keeping, hunting, fishing, hiking trails, etc....

- complete list of forest areas, including a brief description, under the responsibility of the certified company but which it chose to exclude from the scope of certification;

CBB operates in other stands that are not systematically included in the certification process. Often, some owners who show interest in the sustainable management of their estates or in joining a group during preliminary discussions...
with the sector head (CSE) or forestry technician (TEF) are offered to include their estates in the SLIMF group or the non-Slimf group. This is not always done. That’s why all new stands are not included in the certification process.

During the pre-audit and this initial audit phases, we visited the felling areas not included in the certification area. The logging practices observed were similar and complied with by the ISO 9001 and ISO 14001 management systems.

The stakeholders we met underlined CBB’s good standing, even in matters falling out of the scope of the ongoing FSC process.

### 2.2 - Description of forest estates

**Description of the forest(s)**

Type of forest: Temperate

List of key timber species, including marketed species, and other species included in the scope of the certificate:
- Maritime pine, Scots pine, Spruce, Douglas, Beech, Oak, Spanish chestnut, Quaking aspen and various other hardwoods.

Dominant species in the forest estates: hardwoods and softwoods.

Forestry methods and composition of the 7 sectors:

<table>
<thead>
<tr>
<th></th>
<th>Dorgogne sector</th>
<th>Palicot sector</th>
<th>Delcher sector</th>
<th>Cheze sector</th>
<th>Liraud sector</th>
<th>Provot sector</th>
<th>Thomas sector</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coppice forest</td>
<td>60%</td>
<td>48%</td>
<td>12%</td>
<td>3%</td>
<td>14%</td>
<td>10%</td>
<td>29%</td>
</tr>
<tr>
<td>Coppice and high forest</td>
<td>19%</td>
<td>41%</td>
<td>2%</td>
<td>8%</td>
<td>18%</td>
<td>44%</td>
<td>24%</td>
</tr>
<tr>
<td>Selection high forest</td>
<td>10%</td>
<td>5%</td>
<td>8%</td>
<td>18%</td>
<td>44%</td>
<td>15%</td>
<td></td>
</tr>
<tr>
<td>Hardwood regular high forest</td>
<td>2%</td>
<td>15%</td>
<td>7%</td>
<td>29%</td>
<td>20%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Softwood regular high forest</td>
<td>7%</td>
<td>11%</td>
<td>66%</td>
<td>81%</td>
<td>44%</td>
<td>2%</td>
<td>25%</td>
</tr>
<tr>
<td>Poplar stand</td>
<td>2%</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
</tbody>
</table>
List of high conservation values:

Based on the WWF tool kit, CBB undertook a classification of the features of HCVF. A methodology was defined for the identification of high conservation values, stakeholder consultation and related action plans. The document titled « Gestion des FHVC version du 09/11/2011 » ("HCVF Management", 9/11/2011 Version), details out the types of HVCF under CBB area of activity.

List of chemical pesticides used in the forest area and reasons for their use:

Boron salt is used during the felling of softwoods to limit the spread of tree fungus. The product is sprayed directly at the time the tree is being felled with a power saw.

This product is not on the list of FSC- prohibited products (Annex II a, FSC-GUI-30-001, Pesticide policy: Guidance on implementation).

List of categories of products included in the scope of the FM/COC certificate and marketed as FSC certified products:
- hardwood and softwood logs for the paper or energy industry;
- hardwood and softwood lumber for primary processing (sawmill, peeling);
- fuelwood.
Characteristics of the forest management unit

CBB defined two groups that are concerned with certification:

(1) SLIMF group:

It was agreed that owners of forests corresponding to SLIMF in the French context would be one-block estates of less than 25 ha in a given FMU.

They include highly fragmented forests, including stands of very small areas. Production per forest is generally low.

In most cases, the management target of such forests is not intensive production.

They are not bound to have a simple management plan. Only forests of from 10 to 24 ha can voluntarily draw up a management plan. CBB encourages owners of forests that are not subjected to a simple management plan (SMP) to subscribe to the Forest Stewardship Code (FSC).

(2) Non-SLIMF group: comprising forests subjected to SMP, including one-block estates with a surface area of more than 25 ha located in councils bordering the same FMU.

2.3 - Description of the forest management system and plan

Management specifications are prepared by the sustainable management unit at the time of determining with the owner the actions to be conducted, after which the owner is given a copy of the management booklet.

Apart from the general conditions governing group membership, the booklet provides details on:

- FMU administrative profile (identification of owner, geographic location);
- forest plan and cadastre measurements;
- regulatory standards with regard to the forestry, environment, public health, property and urban planning codes;
- existing facilities and infrastructure (access, storage areas, etc.);
- environmental and social studies (landscape, soil bearing capacity, hydrography, Znieff (French acronym for Fauna and Flora natural areas), Natura 2000, IBA (Important bird areas), IBP, HCVF, non-timber services and products...);
- guidelines and programmes of activity;
- logging techniques;
- annexes (forest map, environmental map, IBP spreadsheets, model forms for Forest stewardship code-compliant forests, FSC specifications for CBB), if need be;
- works, sales and self-consumption monitoring forms.
Definition and Implementation of management objectives: management objectives are defined on a case-by-case basis, depending on each owner and the forestry and environmental settings of the relevant stands.

Summary of management plan:

In response to a CAR (corrective action request) formulated at the pre-audit phase, CBB prepared a complete "annual brief of FSC forest certification".

2.4 - Harvesting and production

Annual commercial production:

CBB’s production in 2012 stood as follows:
- 183 000T of round logs;
- 55,000 steres of fuelwood;
- 18,500 m$^3$ of hardwood;
- 39,700 m$^3$ of softwood.

This represents a total of about 260,000 tons equivalent.

Currently, 60% of round logs are harvested from stands of less than 25 ha and 40% from stands of more than 25 ha.

On the basis of a harvest of about 125 T/ha, it can be noted that CBB harvests approximately 1 600 ha annually for about 400 owners.

CBB intends to reach a target of 20,000T of certified timber in 2012 for about 70 owners and 50,000T of timber in 2015 for about 172 owners. After the first 5 years, CBB intends to sustain the 50,000T/year target for a total number of 650 owners. CBB deems that as from 170 owners, it will be necessary to recruit one other staff to manage the group.

2.5 - Certification application template

Type of certificate: Group (type II)
- SLIMF – small forest (one-block FMU <25ha)
- Non SLIMF (one-block FMU >25 ha)

2.6 - Group certification

According to the standard: FSC-STD-30-005 Certification of group forest manager – Draft

Type of group: SLIMF and Non SLIMF
Number of SLIMF group members: 7
FSC Forest Management Certification
Certification Public Summary
Comptoir des Bois de Brive (CBB)

<table>
<thead>
<tr>
<th>FSC CBB NO.</th>
<th>CBB STAND NO.</th>
<th>NAME OF FMU</th>
<th>NAME</th>
<th>Code</th>
<th>COUNCIL</th>
<th>TOTAL SURFACE AREA (HA)</th>
<th>FELLING AREA (HA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CBB-11-004</td>
<td>10311</td>
<td>LES ROCHEES</td>
<td>BAROUTY</td>
<td>23210</td>
<td>AZAT-CHATENET</td>
<td>9,6503</td>
<td>2,0392</td>
</tr>
<tr>
<td>CBB-11-007</td>
<td>63141</td>
<td>BOIS DE LA GARENNE</td>
<td>PEUCH</td>
<td>19700</td>
<td>SAINT-CLEMENT</td>
<td>5,4565</td>
<td>3,0123</td>
</tr>
<tr>
<td>CBB-11-002</td>
<td>63101</td>
<td>LE GRAND ROYERES</td>
<td>DE L'ARBRE DE MALANDER</td>
<td>87270</td>
<td>BONNAC-LA-COTE</td>
<td>7,403</td>
<td>7,403</td>
</tr>
<tr>
<td>CBB-11-001</td>
<td>65268</td>
<td>LA FONTE-HAUTE</td>
<td>DELPONT</td>
<td>15290</td>
<td>OMPS</td>
<td>13,3691</td>
<td>13,3691</td>
</tr>
<tr>
<td>CBB-11-005</td>
<td>Signature 12/12/2011</td>
<td>BOURROUX</td>
<td>FOURNET</td>
<td>19290</td>
<td>PEYRELEVADE</td>
<td>8,85</td>
<td>8,85</td>
</tr>
<tr>
<td>CBB-11-003</td>
<td>63136</td>
<td>LA CHINSONNER</td>
<td>LEENARDS</td>
<td>19310</td>
<td>PERPEZAC-LE-BLANC</td>
<td>5,6738</td>
<td>1,3</td>
</tr>
<tr>
<td>CBB-11-006</td>
<td>80181</td>
<td>LES RIVAILLES</td>
<td>CHAPOU</td>
<td>16220</td>
<td>ORGEDEUIL</td>
<td>1,3365</td>
<td>1,3365</td>
</tr>
</tbody>
</table>

Number of non SLIMF members: 0 as of the date of initial audit.

**Sharing of responsibilities between the administrator and members of the group**

The FSC group is headed by CBB which is responsible for the entire technical and commercial organisation of sites, the monitoring thereof, as well as the management of group members.

**Organization of the group**

The group is organized along 5 major processes:

- Admission of members;
- exclusion of members;
- monitoring of ongoing works in members’ stand;
- information of members;
- assignment of duties to group administrator and group members, based on FSC certification requirements;

Details on the management of the group are contained in procedure P00031 “FSC forest certification system”.

**3 - Legal, administrative and land use context**

- **Applicable national/regional laws and international conventions**
  - International conventions and agreements on sustainable forest management to which France is a signatory:
    - RAMSAR Convention on Wetlands of international importance of 2 February 1971;
    - Convention for the Protection of the World Cultural and Natural Heritage (adopted by the UN in Paris, on 16 November 1972);
- ILO (International Labour Office) Convention;
- Conventions on climate change and biodiversity, defined in 1992 during the UN Conference on the Environment and Development in Rio (known as the Rio Declaration or the Earth Summit Convention);
- The Helsinki Criteria (1993);
- EU directives, including the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora.

- **National legislative and administrative requirements:**
  - Civil Code;
  - Labour Code;
  - Urban Development Code;
  - Rural Code;
  - Forestry Code;
  - Environment Code;
  - Decrees and laws governing forestry and Environmental management.

- **Regional or local requirements and technical guidelines:**
  - guidelines of the Regional Forest Management Master Plan (SRGS);
  - Code of Best Forest Practices (CBPS) in the case of forest estates of less than 25 ha wishing to receive public subsidies;
  - simple management plan (SMP) in forest estates of more than 25 ha
  - Regional Guideline for the Management of Wild Fauna and Habitats (ORGFSH);
  - logging specifications of some influencing entities (national forestry board, forestry experts, Cooperatives).

- **Description of land-use rights (ownership rights)**

  During the signing of the contract with a forest owner, the CSE verifies the seller’s ownership documents. Where necessary, it may refer to the land registry or the council of the relevant jurisdiction.

  - **Summary of applicable legal and customary land-use rights (forest or non-forest)**

    Rights of use vary significantly from one location to another within CBB’s sphere of activity (20 districts). They may concern access to land for agriculture, hunting, picking, fuelwood collection, beekeeping, etc.

  - **Administrative/government authorities involved in forest management (logging, monitoring, protection…).**

    **At the national level:**

    Ministry of Agriculture, General Department for Forestry and Rural Affairs;
    Ministry of Ecology, Development and Sustainable Management.
4 - Other activities

4.1 - Description of other activities

In the forests inspected during the pre-audit and initial audit phases, it was noticed that other activities were carried out within or around the stands concerned, namely:

- hiking;
- motorcycle racing;
- mushroom picking.

In any case, the assessed entity was never involved in such activities. They acknowledged them in their forestry activities so as to create minimum disturbances.

4.2 - Possible impact on forest management

Overall, it was found that the forestry activities audited did not have any adverse impact on the inspected entities, in view of the small size of the forest units on which CBB operates, but also of the good practices implemented by CBB teams, a point that was often acknowledged by the interviewed stakeholders.

A. Initial audit

5 - Base of evaluation
### 5.1 - Membership of the audit team

**Lead auditor:**
- Qualified FCS forest management auditor and CoC for Bureau Veritas Certification, timber expert, independent consultant.

**Auditor:**
- Qualified FCS forest management auditor at Bureau Veritas Certification, forestry expert, biodiversity and environment specialist, independent consultant.

(see CVs of audit team members at annex A)

### 5.2 - Summary of certification process

This initial audit followed a pre-audit which took place from 19 to 21 September 2011 with a view to CBB certification for SLIMF and non-SLIMF groups.

The initial audit made it possible to assess CBB response to corrective actions requests formulated during the pre-audit phase:

**Actions undetaken in response to requests for prior corrective actions:**

<table>
<thead>
<tr>
<th>CAR</th>
<th>Requirement number</th>
<th>Corrective Action Request</th>
<th>Response</th>
<th>Findings of the audit team</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1.6.1</td>
<td>Formalize and publicize CBB commitment policy to confirm its long-term commitment to forest stewardship, in compliance with FSC principles and criteria within SLIMF and non-SLIMF groups.</td>
<td>CBB’s commitment policy was prepared in compliance with FSC principles, criteria and indicators (PCI). It is presented in a document which specifies the implementation tools of this policy (forest routes, forestry specifications, environmental reports). This policy can be accessed on the CBB Web Site.</td>
<td>Satisfactory response, CAR closed</td>
</tr>
<tr>
<td>2</td>
<td>4.2.2</td>
<td>Post the terms for consultation of the Unique Document.</td>
<td>The Unique Document is posted in Brieve and the terms for its consultation were disseminated in the various divisional offices (agencies). This was also discussed during Corporate committees and CHSCTs.</td>
<td>Satisfactory response, CAR closed</td>
</tr>
<tr>
<td>3</td>
<td>4.4.1</td>
<td>Update the list of persons (stakeholders) to be consulted in the context of forestry operations.</td>
<td>The list of stakeholders was drawn up and forwarded to BVC.</td>
<td>Satisfactory response, CAR closed</td>
</tr>
<tr>
<td>4</td>
<td>6.1.1</td>
<td>Formalize the social and environmental impact assessment method used during the initial audit.</td>
<td>The impact assessment procedure and field sheet were prepared.</td>
<td>Satisfactory response, CAR closed</td>
</tr>
<tr>
<td>5</td>
<td>6.1.3</td>
<td>Finalize TEFI forms to be appended to the management booklet.</td>
<td>TEFI forms were defined and appended to management booklets.</td>
<td>Satisfactory response, CAR closed</td>
</tr>
<tr>
<td>CAR</td>
<td>Requirement number</td>
<td>Corrective Action Request</td>
<td>Response</td>
<td>Findings of the audit team</td>
</tr>
<tr>
<td>-----</td>
<td>--------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------------</td>
</tr>
<tr>
<td>6</td>
<td>6.2.1/9.1.1</td>
<td>Supplement the stock of habitats and rare and endangered species, define HCVF by taking into account type1 ZNIEFF and map them in the management booklet.</td>
<td>Type 1 ZNIEFFs are included in the environmental assessment of forest areas. Forest habitats and species of high conservation values are being identified together with conservation associations. The inclusion of related environments will be completed.</td>
<td>See CAR m 2</td>
</tr>
<tr>
<td>7</td>
<td>6.2.2</td>
<td>Train field workers to recognize major habitats of rare or endangered species.</td>
<td>The first training sessions were organized in autumn. Training actions are envisaged in the 2012 training plan. Field workers are trained by the SD unit when a new site is opened. Sensitization forms on endangered species and their habitats are being finalized.</td>
<td>Satisfactory response, CAR closed</td>
</tr>
<tr>
<td>8</td>
<td>7.1.2/7.1.5</td>
<td>Amend the management booklet to further specify the management objectives to be attained per forest type and per forest unit.</td>
<td>The table presenting forest plots includes a column on forestry objectives.</td>
<td>Satisfactory response, CAR closed</td>
</tr>
<tr>
<td>9</td>
<td>7.1.9</td>
<td>Define biodiversity protection and invasive species control measures.</td>
<td>Invasive species control measures were defined on the basis of an invasive species guide and control methods. Biodiversity protection measures, particularly those concerning related environments to be formalized and incorporated in the management booklet or placed at the disposal of field workers (see DAC m and DMNP 6).</td>
<td>See CAR m 2</td>
</tr>
<tr>
<td>10</td>
<td>7.3.3</td>
<td>Update agreements (subcontractors) to include FSC PCI.</td>
<td>Agreements were updated.</td>
<td>Satisfactory response, CAR closed</td>
</tr>
<tr>
<td>11</td>
<td>7.4.1</td>
<td>Prepare the outline of public summaries of management documents for of SLIMF and non-SLIMF groups.</td>
<td>The outline of public summaries of management documents was prepared.</td>
<td>Satisfactory response, CAR closed</td>
</tr>
<tr>
<td>12</td>
<td>8.1.1</td>
<td>Formalize auditing conditions within groups (audit frequency and criteria) (taxation, complaints, monitoring of self-consumption products...).</td>
<td>Audit criteria of group members are defined under procedure 031. Conversely, the mechanism enabling to define non-compliance and corrective actions remains to be developed.</td>
<td>CAR m (and FSC Std 30-005)</td>
</tr>
<tr>
<td>13</td>
<td>8.2.2</td>
<td>Propose and/or adapt existing indicators to the monitoring of SLIMF and non-SLIMF groups.</td>
<td>Indicators were defined (audit criteria)</td>
<td>Satisfactory response, CAR closed</td>
</tr>
<tr>
<td>14</td>
<td>9.1.6</td>
<td>Finalize the list and forms describing important species and habitats for each region, together with experts and conservation associations.</td>
<td>Work with several conservation associations has advanced at various levels according to regions.</td>
<td>CAR m 4</td>
</tr>
</tbody>
</table>

FSC STD 30 005 V1

| 15  | 3.1                | Clearly define the FMUs taken into account in SLIMF and non-SLIMF groups.                                                                                                                                                       | Definition of FMUs specified in PO 0031                                                                                                                                                                               | Satisfactory response ; CAR closed |
5.3 - Forest management standard(s) used for the initial audit

The standards used for the initial audit were those developed by BVC for France (RF03 FSC GF France v3.3), as well as FSC STD 30 005 V1 for the management of groups.

5.4 - Stakeholders comments

Stakeholders were consulted within the framework of this audit. They include:

- Mr. Didier BRANCA of CRPF Limousin, who thinks that this initiative falls in line with the objectives defined by CRPF notably, to improve the quality of forestry and increase the size of managed areas. He believes that the level of consideration for non-economic aspects by CBB in forestry activities is high. Feedback from forest owners concerning CBB was positive, compared to other forestry companies.

- Mr. David Naudon of LNE followed up the way CBB addressed matters concerning fauna/habitats, and feels that CBB's vision is positive and would like to entertain collaboration with CBB, notably through field surveys (IBP).

- Mr. Frédéric Béchon, a forestry expert, underlined the positive image CBB projected on the field through the implementation of good practices, both forestry and environmental or with regards to workers' safety.

- Mr. Alain Persuy, environmental engineer at CRPF Poitou-Charentes worked with CBB within the framework of the training of CBB technical officers. He recognized CBB's motivation and interest in the certification process and the positive impact it would have on forest owners.

6 - Information collecting modalities

6.1 - Description of the audit programme

The initial audit was combined with ISO 9001 and ISO 14001 monitoring audits.
### FSC FM INITIAL AUDIT: RF03 FSC GF France v3.3/ FSC STD 30 005 V1 management of groups

**Monday, 5/12/11**

**Audit team**: Damien SCHMUTZ (1) – Stéphane RIVAIN (2)

<table>
<thead>
<tr>
<th>Time</th>
<th>ISO 9001</th>
<th>ISO 14001</th>
<th>FSC</th>
<th>Audited activities</th>
<th>People met</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:30-9:00</td>
<td>1.2 GP01</td>
<td>1.2 GP01</td>
<td>FSC</td>
<td><strong>Opening meeting</strong>&lt;br&gt;Presentation of the audit, objectives and modalities,&lt;br&gt;Possible revision of the audit programme,&lt;br&gt;Scope of the audit and excluded areas</td>
<td>FSC team Service heads</td>
</tr>
<tr>
<td>(1+2)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9:00-9:30</td>
<td></td>
<td>CAR</td>
<td></td>
<td><strong>Assessment of responses to corrective actions requests for CAR (documentation)</strong></td>
<td>ER VF</td>
</tr>
<tr>
<td>9:30-10:45</td>
<td>5.1 5.2</td>
<td>4.2. 4.3.3</td>
<td>FSC</td>
<td><strong>Management</strong>&lt;br&gt;Presentation of innovations for 2011&lt;br&gt;Management commitment&lt;br&gt;EQ policies and objectives&lt;br&gt;Resources, roles, responsibilities and authority&lt;br&gt;Attending to customers and interested parties&lt;br&gt;Communication&lt;br&gt;Management review</td>
<td>SC ER</td>
</tr>
<tr>
<td>(1+2)</td>
<td>5.3 5.4</td>
<td>4.4.1. 4.4.3.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10:45-12:30</td>
<td>4.3.1. 4.3.3.</td>
<td>4.2-4.6-7</td>
<td>FSC</td>
<td><strong>SME</strong>&lt;br&gt;Environmental issues&lt;br&gt;EQ management programmes&lt;br&gt;Legal and other requirements&lt;br&gt;Compliance assessment&lt;br&gt;Emergency situations</td>
<td>ER</td>
</tr>
<tr>
<td>(1)</td>
<td>4.3.2. 4.5.2. 4.4.7</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10:45 -</td>
<td></td>
<td></td>
<td>FSC</td>
<td><strong>Desk assessment</strong></td>
<td>VF</td>
</tr>
<tr>
<td>12:30-2:00</td>
<td></td>
<td></td>
<td></td>
<td><strong>Lunch Break</strong></td>
<td></td>
</tr>
<tr>
<td>14h:00-</td>
<td>6.2 8.2</td>
<td>4.4.2</td>
<td>FSC</td>
<td><strong>Training / Communication</strong></td>
<td>PL</td>
</tr>
<tr>
<td>14:45</td>
<td></td>
<td></td>
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<td></td>
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</table>
### Time Table

<table>
<thead>
<tr>
<th>Time</th>
<th>ISO 9001</th>
<th>ISO 14001</th>
<th>FSC Activities audited</th>
<th>People met</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2:00 - 18:00</strong> (2)</td>
<td>7.1</td>
<td>4.3.2</td>
<td>Desk assessment (followed)</td>
<td>VF</td>
</tr>
<tr>
<td><strong>14:45-4:00</strong> (1)</td>
<td>7.1</td>
<td>4.3.2</td>
<td>Round log purchase/trading Purchase Planning Strategic objectives Audit</td>
<td>GH</td>
</tr>
<tr>
<td><strong>4:00-17:00</strong> (1)</td>
<td>7.1</td>
<td>4.3.2</td>
<td>Logging Purchase Planning Strategic objectives Audit</td>
<td>SD</td>
</tr>
<tr>
<td><strong>17:00-17:30</strong></td>
<td>4.2.3</td>
<td>4.4.4</td>
<td>Consultation with staff representatives</td>
<td>ER</td>
</tr>
<tr>
<td><strong>17:30 - 18:00</strong> (1)</td>
<td>4.2.4</td>
<td>4.4.5</td>
<td>Desk management</td>
<td></td>
</tr>
<tr>
<td><strong>18:00-18:15</strong> (1+2)</td>
<td></td>
<td></td>
<td>Wrap-up meeting</td>
<td></td>
</tr>
</tbody>
</table>

**Tuesday, 6/12/11**

Audit team: Damien SCHMUTZ (1) – Stéphane RIVAIN (2)

<table>
<thead>
<tr>
<th>Time</th>
<th>ISO 9001</th>
<th>ISO 14001</th>
<th>FSC Activities audited</th>
<th>People met</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>7:30-11:30</strong> (1+2)</td>
<td>7.1</td>
<td>4.3.3</td>
<td>Principles 2 to 9 Group management</td>
<td>AL</td>
</tr>
<tr>
<td><strong>12:00-14:30</strong></td>
<td></td>
<td></td>
<td><em>Transfer (1h) and lunch</em></td>
<td>TC</td>
</tr>
<tr>
<td><strong>14:30-17:30</strong> (1+2)</td>
<td>7.1</td>
<td>4.3.3</td>
<td>Principles 2 to 9 Group management</td>
<td>TC</td>
</tr>
</tbody>
</table>

- **Azat Chatenet (23)** 1h40mn => Azat Chatenet
- **Liraud Sector**
- **Peyrelevade (19)**
- **Cheze Sector**
### Wednesday, 7/12/11

**Audit team**: Damien SCHMUTZ (1) – Stéphane RIVAIN (2)

<table>
<thead>
<tr>
<th>Time</th>
<th>ISO 9001</th>
<th>ISO 14001</th>
<th>FSC</th>
<th>Activities audited</th>
<th>People met</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00-11:30</td>
<td>* 7.1</td>
<td>* 4.3.3</td>
<td>Principles 2 to 9</td>
<td>Omps (15)</td>
<td>JPD</td>
</tr>
<tr>
<td>(1+2)</td>
<td>7.5</td>
<td>4.4.3</td>
<td>Group management</td>
<td>1h15mn =&gt; Omps</td>
<td></td>
</tr>
<tr>
<td></td>
<td>7.6</td>
<td>4.4.6</td>
<td></td>
<td><strong>Delcher Sector</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>6.3</td>
<td>4.4.7</td>
<td></td>
<td>Office</td>
<td></td>
</tr>
<tr>
<td></td>
<td>6.4</td>
<td>4.5.1</td>
<td></td>
<td>Inspection of FSC premises</td>
<td></td>
</tr>
<tr>
<td></td>
<td>8.3</td>
<td></td>
<td></td>
<td>Works ongoing</td>
<td></td>
</tr>
<tr>
<td></td>
<td>8.2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11:30-2:00</td>
<td>* 7.1</td>
<td>* 4.3.3</td>
<td>Principles 2 to 9</td>
<td>Perpezac le blanc (19)</td>
<td>TD</td>
</tr>
<tr>
<td>(1+2)</td>
<td>7.5</td>
<td>4.4.3</td>
<td>Group management</td>
<td><strong>Palicot Sector</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>7.6</td>
<td>4.4.6</td>
<td></td>
<td>Inspection of FSC premises</td>
<td></td>
</tr>
<tr>
<td></td>
<td>6.3</td>
<td>4.4.7</td>
<td></td>
<td>+ loggers/power saw or carrier site</td>
<td></td>
</tr>
<tr>
<td>17:30</td>
<td></td>
<td></td>
<td></td>
<td>Back to Brive (30 minutes)</td>
<td></td>
</tr>
</tbody>
</table>

### Thursday, 8/12/11

**Audit team**: Damien SCHMUTZ (1) – Stéphane RIVAIN (2)

<table>
<thead>
<tr>
<th>Time</th>
<th>ISO 9001</th>
<th>ISO 14001</th>
<th>FSC</th>
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<th>People met</th>
</tr>
</thead>
<tbody>
<tr>
<td>7:30-12:00</td>
<td>* 7.1</td>
<td>* 4.3.3</td>
<td>Principles 2 to 9</td>
<td>Orgedeuil (16)</td>
<td>VM</td>
</tr>
<tr>
<td>(1+2)</td>
<td>7.5</td>
<td>4.4.3</td>
<td>Group management</td>
<td>2hrs =&gt; Orgedeuil</td>
<td></td>
</tr>
<tr>
<td></td>
<td>7.6</td>
<td>4.4.6</td>
<td></td>
<td><strong>Moreau Sector</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>6.4</td>
<td>4.4.7</td>
<td></td>
<td>Visit of FSC premises</td>
<td></td>
</tr>
<tr>
<td></td>
<td>8.3</td>
<td>4.5.1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>8.2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11:30-13:30</td>
<td></td>
<td></td>
<td></td>
<td>(1) Transfer to Saillat (40 minutes) and lunch</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(2) Transfer to Bonnac (1h15) and lunch</td>
<td></td>
</tr>
<tr>
<td>13:30-14:45</td>
<td>7.1</td>
<td>4.3.3</td>
<td></td>
<td>Service Supply Chain.</td>
<td>JMY</td>
</tr>
<tr>
<td></td>
<td>7.4</td>
<td>4.4.6</td>
<td></td>
<td>RSP purchase/trading.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>8.3</td>
<td>4.5.1</td>
<td></td>
<td>Planning-sale.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>8.2</td>
<td></td>
<td></td>
<td>Transportation.</td>
<td></td>
</tr>
</tbody>
</table>
## 6.2 - Documents reviewed

### 15:30-16:30
- **Consultations with PP in Limoges** (list to be finalized by audit time)
- **Transfer to Brive (1 hour)**

### 14:00-15:30
- **Bonnac la Cote (87)**
- **Poisson Sector**
- Inspection of FSC premises
- Works ongoing

---

<table>
<thead>
<tr>
<th>Time</th>
<th>ISO 9001</th>
<th>ISO 14001</th>
<th>Auditor</th>
<th>Activities audited</th>
<th>People met</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00-9:00</td>
<td>6.1</td>
<td>4.4.6</td>
<td>8</td>
<td>Monitoring and measurements. Internal audits.</td>
<td>ER</td>
</tr>
<tr>
<td>9:00-10:00</td>
<td>4.1</td>
<td>4.4.4</td>
<td>2</td>
<td>Processing of claims.</td>
<td>ER</td>
</tr>
<tr>
<td>8:00-10:00</td>
<td>6.3</td>
<td>4.4.7</td>
<td>All FSC principles</td>
<td>Additional activities/field visits.</td>
<td>VF</td>
</tr>
<tr>
<td>10:00-12:00</td>
<td>FSC STD 30005</td>
<td>Group management Monitoring</td>
<td>ER  VF</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12:30-2:00</td>
<td>Lunck break</td>
<td>Drafting of findings.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2:00-4:00</td>
<td>---</td>
<td>---</td>
<td>Closing meeting. Presentation of findings based on the three standards.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4:00-16:30</td>
<td>---</td>
<td>---</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Documents reviewed during this audit:

- Enterprise manual, September 2010
- CBB organization chart
- The enterprise policy (March 2011)
- Sustainable management policy
- 2011 strategic objectives
- 2011 safety objectives
- 2011 Strategic Action Plan (SAP)
- 2011 Environmental Action Plan (EAP)
- Biannual individual interview form
- 2010/2011 and 2011/2012 training plan
- 2011 training evaluations
- CBB/Célimo 2011 Customer satisfaction indicators (CSI)
- Balanced scorercard 5/12/11
- CBB – CBB-DOC6067 regulatory basis
- Internal audit procedures
- Claims processing procedures
- Hydraulic oil sampling procedure
- “FSC certification system” procedure P00031 A
- Controlled timber procedure P00028 D
- FSC chain of custody procedure P00029C
- Incident notification form (Life)
- Internal guide: list of indigenous and exotic species
- Internal guide: FSC “Plantation” or “natural forest”
- FSC 2011 policy and specifications of 15/09/11
- FCS forestry “framework” document
- Datasheet of stands per forestry unit - 22/11/11 version
- Land survey form and impact assessments - 9/12/11 version
- TEFI form - 21/11/11 version
- Forest routes
- Annual summary report of FSC forest certification - 21/10/11 version (outline)
- HCVF management - 9/11/11 version
- Files of standing volumes inspected
- Standing volumes purchase files (declaration of site opening, work contract, DICT request, right-of-way authorization)
- Auditing procedure of standing volumes and logging operations auditing benchmarks
- Safety audit reports
- “Didactic tools” for loggers and off-road logging vehicles
- Induction and FSC training for employees and sub-contractors
- List of authorized sub-contractors
- Sub-contracting framework agreement
Work contracts
Logistical quality standard for the transport of round logs
Audit report of round log suppliers
PAQ 8: assessment of sub-contractors
General transport procurement conditions
Timber sale contract /acceptance procedures in the presence of both parties/timber scaling listing
Invoices and delivery slips

6.3 - Interviews of people met

Mr. Emmanuel RIPOUT and Mr. Vincent Fidon, in charge of the sustainable development unit guided us during the entire audit and attended all meetings.

- Owners(s):
  - Mr. John Leenards, owner at Perezac le Blan (19)
  - Mr. Delpont, husband of the owner at Omps (15)

- Managers:
  - Stéphane Corée - GM

- Employee(s):
  - Emmanuel Ripout – Business Support officer
  - Vincent Fidon – Sustainable management officer
  - Maxime Aubert – sustainable management technician
  - Patricia Lachaud - HRO
  - Charline Giraud – Official representative - SD
  - Saïd Diffe – Logging officer
  - Gilbert Hoellinger – Roundlogs trading officer
  - Stéphane Poujade – Management controller
  - Jean-Marc Yvernault – Supply Chain and trading officer
  - Dominique Troubadis – Payroll service
  - Corinne Doffe – Training monitoring
  - Thibault Damboradjian – TEF and staff representative
  - Brigitte Puidebois – PCS assistant and staff representative (cash flow)
  - Dominique Lefebvre – Business Support assistant
  - Dominique Chenieux – Saillat Transport Supply Chain assistant
  - Lionel Henry – Saillat Supply Chain logistics coordinator

Creuse branch:
- Aurélien Liraud - CSE
- Ludovic Porte – TEF

Correze branch
- Thierry Cheze
- Bertrand Freyssac – Logger and carrier
Cantal branch
- Jean Pierre Delcher – CSE
- Guillaume Andelot – TEF
- Paul Carrière – TEF
- Jean-Pierre Grassinot – TEF
Correze branch (Brive)
- Bernard Palicot
Charente branch
- Emmanuel Poisson – CSE
- Vincent Moreau – TEF
- Antoine Béchon - TEF

- Sub-contractors(s):
  - Zeki Ayvali– Logger, Liraud sector
  - Yunus Ayvali – Assistant logger
  - Gérard Teulade – Forest works engineer (Cheze sector)
  - KORKMAZ (Logger, Bonnac-La-Côte site)

6.4 - On-sites visit

<table>
<thead>
<tr>
<th>Distric t</th>
<th>Council</th>
<th>Type of forest</th>
<th>Clear-cut harvesting and natural regeneration</th>
<th>Stands improvement</th>
<th>Environmental constraints</th>
<th>Social constraints</th>
</tr>
</thead>
<tbody>
<tr>
<td>23</td>
<td>Azat Chatenet Liraud sector</td>
<td>10 stands of 9.65 ha Mix of coppice and deciduous seedling plus regular seedling forests</td>
<td>X For mature stands-sanitary cutting</td>
<td>X Hardwoods target</td>
<td>Non Ibp 17</td>
<td>Hunting</td>
</tr>
<tr>
<td>19</td>
<td>Peyrelevade Cheze sector</td>
<td>4 stands of 8.85ha Mix of coppice and deciduous seedling plus regular seedling forests</td>
<td>X pending PNR expertise</td>
<td></td>
<td>Natura 2000 zsp IBA Contact with PNR Bird nests issue</td>
<td>Hunting</td>
</tr>
<tr>
<td>19</td>
<td>Sarran Cheze sector</td>
<td>Softwood/hardwood copice forests Not included in SLIMF certification</td>
<td>X</td>
<td></td>
<td></td>
<td>Power-saw employees</td>
</tr>
<tr>
<td>15</td>
<td>Omps Delcher sector</td>
<td>7 stands of 13.34ha regular seedling forests</td>
<td>X Maintained</td>
<td></td>
<td></td>
<td>Mushroom picking</td>
</tr>
<tr>
<td>19</td>
<td>Perpezac le blanc Palicot sector</td>
<td>5 stands of 5.67 ha deciduous seedling forests – coppice forests</td>
<td>X Maintained</td>
<td></td>
<td></td>
<td>Crossing of watercourse, during dry periods TEF</td>
</tr>
</tbody>
</table>
6.5 - Stakeholder identification and consultation

The list of stakeholders whose consultation was organized by BVC is appended to this report.

As of the initial audit date, there was no feedback from stakeholders.

Within the context of this initial audit, the following persons were consulted:
- Mr. Didier Branca of CRPF Limousin
- Mr. David Naudon of LNE
- Mr. Frédéric Béchon, Forestry expert
- Mr. Alain Peruy, environmental engineer, CRPF Poitou-Charentes

6.6 - Other evaluation techniques

No particular technique was used.

6.7 - Closing meeting of the initial audit

The closing meeting took place in the presence of CBB management.

Prior to the presentation of CARs resulting from the gaps observed during the audit, the audit team made a summary of existing strengths and weaknesses.

7 - Audit team observations

The audit team highlighted the following strengths and weaknesses:

**STRENGTHS**

- strategic objectives of the 2011 policy are relevant, shared and deployed within the company;
- sound structuring and internal communication (management review, Management committee, adjustment meetings, sector head meetings, zone head meetings, general information meetings (2/year), Chsct, DP…);
- bi-annual individual interviews are completed and structured, contributing to the continuing improvement and coherence of company action;
✓ conditions governing the preparation and monitoring of the training plan (planning and evaluation);
✓ the FSC/FM certification was based on a sound management system;
✓ the Life approach and the use of feedback to feed the preparation of prevention plans
✓ quality of the management booklet and, generally, documents collected for FSC/FM
✓ quality of forestry operations as concerns both silvicultural techniques and works execution;
✓ internet site developed by CBB in view of the certification;
✓ management of John Deere machine oils making it possible to the frequency of reduce oil change.

WEAKNESSES

✓ a number of documents prepared recently within the framework of FSC certification had no version nor date;
✓ there are no records to attest that corrective actions undertaken after the audit are completed;
✓ this year, only new sub-contractors were included taken in PAQ8 2011

7.1 - Evaluation results with reference to the FSC referential / standard

7.1.1 - Principle 1 – Compliance with laws and FSC principles

CBB is certified ISO 9001 and 14001. This audit being combined with ISO audit, we had to assess the regulatory intelligence procedures put in place by CBB. We noticed that the regulatory framework was up-to-date and that regulatory instruments were complied with.

Owners are informed of the legal provisions applicable through the management booklet and later on through CBB monitoring. Any owner who operates on his stand in violation of the management booklet prescriptions may be excluded from the group. Exclusion conditions are specified in the contracts signed with owners.

Persons (employees or sub-contractors) operating on FSC stands are informed by the CSE or TEF of the provisions to comply with when opening the site (sub-contractor’s work contract).

In any case, all violations and complaints are assessed in accordance with CBB procedures or within the framework of the ISO management system.
7.1.2 - **Principle 2 – Land tenure, user rights and responsibilities**

CBB does not own the forests in which it carries out its activities. The work of CBB teams is authorized within the framework of a contract signed with the owner.

During initial inspection, the “Sustainable Management” service conducts a diagnosis based on a check-list that takes into account all aspects relating to land tenure and user rights and addressed in the management booklet. No owner can become member of the group if the situation of his estate is not clearly defined and controlled (title register).

During this initial audit, several files were examined and found to be complete since they contained all the documents attesting that adequate measures had been taken in accordance with the regulations in force and CBB internal procedures (title register, purchase contract and estimates sheet, notice of site opening, work contracts with sub-contractors, notification of works commencement, telephone line, authorization of right-of-way…).

All the audited sites were always clearly identified through CBB site signs.

Within the framework of its environmental management system, CBB may have to implement a conflict management procedure (M06012)

7.1.3 - **Principle 3 – Indigenous peoples’ rights**

This principle is not applicable in the context of France.

7.1.4 - **Principle 4 – Community relations and workers’ rights**

Operators or sub-contractors were interviewed during this initial audit. All field assessment was positive.

We noticed that staff representative bodies (CE and CHSCT) were operational. We held discussions with staff representatives on Monday, 5/01. CE and CHSCT meet regularly and systematically produce minutes thereon.

All necessary measures were taken internally to ensure that employees work in a social, hygienic and secure environment that meets minimum regulatory standards. All CBB workers received training on first-aid at the workplace. Within the framework of International Paper general policy, major attention is paid to health and safety aspects (Life Project), as well as the social wellbeing of the community (Galup Survey).

Before recruiting sub-contractors, CBB verifies that they fulfil administrative requirements (Kbis, RC…). Verifications are conducted every year within the framework of annual agreements meetings. When signing the agreement, the sub-contractor is given a prevention plan (safety directives) and environmental specifications to be
implemented on the field. This year, in keeping with the changes occurring within the regulatory framework (Decree No. 2010-1603 of 17 December 2010 relating to sanitation and safety rules in forestry and silvicultural sites), CBB staff as well as their various sub-contractors working on CBB stands were trained on the requirements of the new decree.

In keeping with ISO certification, where directives (safety, environmental) are not applied, the CSE opens an observation file. Moreover, audits are planned every year to ensure that safety directives in particular are applied. Sub-contractors are evaluated within the framework of PAQ 8 (quality system) by CSE.

7.1.5 - **Principle 5 – benefits from the forest**

All forestry activities supervised during the audit were coherent and aimed at sustaining forest resources and improving stands and biodiversity. It was also noticed that recommendations made to owners were not guided by the need of future supplies to the paper industry. Timber harvested is processed by CBB that has a significant customer base for the product, even for timber harvested from declining woodlands (fuel wood platform).

To carry out forestry activities, certain procedures and methods (TEFI forms: low-impact forest exploitation) are implemented to limit any adverse effects, in accordance with FSC specifications for CBB. Works are supervised by CSE and TEF who undertake unexpected stand inspections. Any eventual non-compliance observed during the logging phase is addressed through ISO system (remedial, corrective or preventive action) in order to find solutions tailored to the issue at stake and, specifically, to avoid any re-occurrence.

Overall, we noticed that the inspected sites operated in keeping with good practices. There were no cases of abnormal logging residues.

7.1.6 - **Principle 6 – Environmental impact**

CBB already has a sound theoretical basis for these notions of impact assessment under ISO 14000 certification process. An environmental impact assessment is summarized in the table presenting significant environmental aspects (SEA). The remedial measures taken by CBB are reflected in the management system put in place by the company.

The Sustainable Management Unit is responsible for the prior environmental assessment. Such assessment is documented in the management booklets given to owners (see § 2.3). To reduce the impacts of logging, the company documented its best practices under TEFI specifications (Reduced-impact logging techniques) that can be implemented on a case-by-case basis.

Measures were taken to ensure the protection of rare and endangered species and their habitats. The existence of specific habitats and species was determined using regulatory data or official inventories
(ZNIEFF type 1, Natura 2000, IBAs, SPAs, and SACs). This is found in the management booklet. As concerns non-SLIMF group owners who are bound to have SMPs, it may be decided to resort to conservationists, as the case may be, to supplement SMPs on these aspects when drafting the management booklet.

For stands description, the Sustainable Development Unit uses the IBP method (Index of Biodiversity Potential) that was developed by CRPF Midi Pyrenees.

Staff of the "Sustainable Management" unit was trained on these aspects, though further training of the unit is envisaged in 2012 (according to the 2012 training plan). CSE and TEF were trained by the "SUSTAINABLE MANAGEMENT" unit. Moreover, the presence of particular species/habitats is notified to workers or subcontractors on the field. Area sheets are being prepared for finalization. The owners are informed of the presence of species in the management booklet.

Through observations on the field, it was found that CBB consistently seeks to maintain, or even increase the ecological functions and values of stands on which it operates (maintaining oaks or other hardwoods in given situations...).

To prevent erosion, preserve water resources and reduce logging damages, procedures were developed and applied on the field.

FSC specifications state that a 5m buffer zone shall be maintained around wetlands.

In addition, it should be noted that CBB does not systematically use pesticides except in particular cases and where the regulations in force authorize the use of solubor (tree fungus).

Absorption kits are available on the stands when machinery is used. Generally, CBB developed means to control and manage chemical substances and residues.

7.1.7 - Principle 7 – Management plan

The management booklet serves as the management plan for both SLIMF and non-SLIMF owners:

- For SLIMF: owners for whom CBB activities are conducted in the context of the FSC, on less than 25 ha, who are therefore not bound to having a management document.

- Conversely, for non-SLIMF, owners must have a SMP. Firstly, CBB seeks to include into this group owners who have not yet established a SMP, without excluding those who already have a SMP.

The procedure for drafting the management booklet is summarized in the following diagram (extract of CBB Procedure M06022):
The management booklet comprises the following sections:
- owner’s administrative data;
- land measurements and registry correspondence;
- regulatory analysis;
- Equipments on the estate;
- environmental and social assessment;
- objectives per forest estate and intervention programme;
- reduced impact logging techniques.

The booklet is coupled with:
- forest maps;
- title registry;
- IBP spreadsheets;
- Forest stewardship code sheets templates for the owner’s region;
- CBB FSC specifications;
- CBB FSC general membership conditions.

The CBB file also contains the stand datasheet, the land surveys and potential environmental assessment sheet, including an analysis HCVF presence. Where necessary, the rare and endangered species description form, reduced Impact Logging techniques used and information on invasive species present.

Harvest rates are defined according to species, stand types and selected silvicultural routes (those developed by the CRPF).

The items to be monitored (forestry, environmental or social) are stated and documented in the management document (IBP, processing of complaints, nature of disputes, type of paths, presence of waste...).

The implementation of actions provided for in SLIMF owners’ management booklets is planned and the revision of these documents follows a specific schedule:
- Possible review after 5 years and automatic renewal every five years
- Review after 10 years, otherwise the member is excluded from the group.

The work of staff and sub-contractors is supervised, training gaps identified (internal audit, observation sheet, PAQ8) and where appropriate, a programme is developed to address these gaps.

A public summary of forest certification was prepared and presented to the audit team (see annex).

7.1.8 - Principle 8 – Monitoring and assessment

Post-operation monitoring activities are being conducted correctly and improved thanks to many years of ISO 14000 experience. Procedure P00031 defines post-operations monitoring arrangements. It is the responsibility of the sustainable management unit to carry out such audits on a classical sampling basis $X = 0.6\sqrt{n}$ ($n$ being the number of member owners).

During monitoring, controls focus particularly on:
- HCVF (to ensure that all HCVF are inspected every 5 years);
- estates that may impact water resources (slopes, riverine forests and wetlands);
- estates on which social issues may be identified during the inventory phase;
- all estates subject to an administrative procedure.

The owner must be present during the audit, otherwise the audit will be considered null and void.
A complete audit template was presented to the audit team. Data concerning forestry, biodiversity, water, soil, air, landscape, social issues, logging will be included therein. A report is prepared at the end of the audit and sent to the owner. Where any gaps are identified, the report will not be classified until they are addressed.

During the drafting of the management booklet, field data is stored in a database. During monitoring controls, the sustainable management unit supplements this database.

CBB has a good traceability track-record (see §7.3).

### 7.1.9 - Principle 9 – Maintenance of high conservation value forests

An initial approach was adopted to determine HCV features. This work was carried out by the Sustainable Management Unit, in accordance with WWF methodology. It was the subject of extensive consultation with independent experts, associations and nature conservation bodies.

HCVF identification method is based on the following definitions of high conservation value:

- existence of a compliant zoning system (APPB, RNN, RNR, ENS, Natura 2000, type 1 ZNIEFF, classified sites, classified woodlands, etc.);
- **complementary** identification of rare species or habitats by local conservation associations;
- existence of habitats of community interest through the presence of specific species. This list should be completed (minor CAR 4);
- existence of elements characteristic of types 4 and 6 HCVF (major hiking trail, hiking plans (PDIIPR), small houses, watercourses bank protection (5 m buffer zone), steep slope with a runoff or erosion risk).

### 7.1.10 - Principle 10 - Plantations

CBB defines a plantation as follows:

1) Forest of predominantly trees established by planting and/or deliberate seeding;
   and,
   Stand of high forest (regular hardwood or softwood) whose rotation is less than 40 years;
   or

1) Forest of predominantly trees established by planting and/or deliberate seeding;
   and,
   Use of exotic species that need to be monitored

CBB prescriptions regarding plantations are consistent with Principle 10 of the FSC criteria and are stated in the management booklet. The owners are expected to comply thereto, under pain of being excluded from the group (internal audit controls).
7.2 - Systematic presentation of results

See auditors' verification list in annex C of this report.

7.3 - Product identification, traceability and monitoring

7.3.1 - Description of the implemented systems to ensure the traceability

To award FSC certification to a felling area and consider its products to be FSC pure, the forest management unit must have been found to be FSC compliant by the sustainable management unit.

Upon establishment of the management booklet, the sustainable management unit assigns the owner a membership number. This number is written on the third party IOS management file and the felling area is considered FSC under site management.

Each group member is assigned a membership number as follows:

- CBB.
- 2 figures for the year of accession to membership
- 3 figures in chronological order.

For example:
- CBB-11-S-1-001 for the first 2011 HCVF SLIMF member
- CBB-11-P-0-001 for the first 2011 SMP

The site review available in IOS makes it possible to visualize quantities certified as purchase and sales. Not through a pivot table. All timber purchased from an FSC-certified felling area is pure FSC timber. This is captured in IOS through delivery slips or sales entries.

7.3.2 - Description of the final location of taking in charge

Initial location: timber is purchased in bulk or product unit. The timber is considered to belong to CBB as soon as it is felled (in the case of bulk sale) or upon receipt in the case of product unit sale.

Final location: Once felled and skidded, timber is stored in an area adjacent to the site.

CBB is responsible for organizing and ensuring the transportation of timber to the Saillat factory. However, timber sold to third parties is roadside timber.

7.3.3 - Description of the documentation or product marking system

A procedure was prepared on FSC-related aspects. The system already operates PEFC.

7.3.4 - Evaluation of the mixing risk
Timber is identified using an IOS-managed number plate. This number helps to identify the corresponding felling area. Pulpwood is not identified by unit but by lot. It is possible that for transportation reasons, a truck picks up timber and mixes product from two different stands. In this case, the CSE browses the timber portal to allocate the amount of wood corresponding to each stand, on the basis of cubic volumes calculated on the field. It is worth noting that at CBB, if timber is not 100% certified, it is at least FSC CW.

7.4 - Elements subjects to controversy

There were no controversial issues.

8 - Scope retained for the certification

Purchase of standing hardwood and softwood, logging and transportation of roundlogs within the framework of certification of SLIMF and non-SLIMF groups.

8.1 - Geographical limitation at the level of the entity

For the SLIMF group, only one-block estates of less than 25 ha, and for the non-SLIMF group, all one-block estates of more than 25 ha situated in regions where CBB operates (see paragraph 2.2) and signatories to agreements may also be included in the group and in the certification process.

8.2 - Limitation at the level of the forest products

All forestry products were concerned.

9 - Proposals regarding the certification decision

9.1 - Explication on all rating, weighting systems or other systems used decisions taking

The audit team did not use any scoring or weighing system to conduct the initial audit.

In fact, all standard requirements were considered of equal importance, since each criterion had to be met by the candidate company. Corrective action requests were evaluated for each indicator.

9.2 - 8.2 - Clear description of all recommendations and conditions associated to the certification decision

No recommendations, conditions or prior actions were associated with the certification proposal.

9.3 - Minor corrective actions requests
### No. Criterion Description Deadline

1. 4.4.3 and 6.2.1 Supplement procedure M0006022 “FSC management booklet” by specifying at what stage consultation of stakeholders and conservationists takes place (for non-SLIMF). 12 months or next monitoring audit

2. 6.1.3 and 7.1.9 Formalize forms presenting the conservation measures of related environments and append them to the management booklet and work contracts. 12 months or next monitoring audit

3. 8.3.7 Define and implement internal information arrangements on FSC claims on contracts and sale documents for lumber marked as 100% FSC. 12 months or next monitoring audit

4. 9.1.6 Finalize the list and datasheet of forest species and habitats, in collaboration with experts and conservation associations. 12 months or next monitoring audit

<table>
<thead>
<tr>
<th>FSC STD 30 005 V1</th>
</tr>
</thead>
</table>

5. 2.3 Strengthen communication and sensitization tools in view of a wider ownership of the FSC approach by CSE, TEF and members. 12 months or next monitoring audit

6. 8.7 Define criteria for identifying major or minor gaps observed during auditing. 12 months or next monitoring audit

### Auditors’ comments:

**CAR No.1:**

The graph on procedure M06022 describing the management booklet drafting process, in the case of non-SLIMF, does not provide for consultation with stakeholders and conservationists. This should be included in the procedure in order to be consistent with the expected outcomes of the management booklet.

**CAR No. 2:**

Not only forest habitats were taken into account for the preparation of datasheets for habitats and species to be considered as high conservation value attributes. Often, forest values, in terms of biodiversity, reside in open spaces associated with forests: heath lands, peat bogs, wet or humid meadows, rocky cliffs, dry grasslands, caves, etc. The list of such related environments should therefore be defined in conjunction with CBB’s partner conservation associations in each region, and the corresponding datasheet prepared as in the case of forest habitats.

**CAR No. 3:**

Non-compliance in this case concerns sales to third parties other than IP. Rules governing FSC claims (notably 100% FSC) in contracts, scaling sheets, delivery slips, were not yet clearly defined as at the date of the initial audit. This non-compliance is a minor shortcoming since as at now, no lumber customer has placed an order for FSC-certified timber (no sawmill or processing firm is presently FSC-certified).
CAR No. 4:
Habitats and species with a high conservation value for forests are being defined but forms are available for only a few species. This activity should be supplemented and finalized in each region.

CAR No. 5:
During interviews with CSEs and TEFs, it was noticed that the reasons put forward to convince owners to join the group were not the same and could lead to confusion. It is necessary to standardize arguments and provide workers with a communication tool to be served to owners. The audit team considered this non-compliance as a minor shortcoming since CBB made substantial efforts this year to sensitize and train its staff, and it would be necessary to give them time to adjust.

CAR No. 6:
CBB did not define the audit arrangements. It is necessary to describe the gaps noted during the audit, in order to be able to classify them and determine corrective measures accordingly.

9.4 - Major corrective actions requests
There were no major corrective actions request during the initial audit.

9.5 - Observations
During the closing meeting, a number of observations were made with regard to the standards:

<table>
<thead>
<tr>
<th>Obs.</th>
<th>Criterion/Indicator</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>6.2.4.</td>
<td>Define the related environments in Procedure P0031.</td>
</tr>
<tr>
<td>B</td>
<td>4.2.3.</td>
<td>Strengthen the monitoring of first-aid kits and “cut limb” kits.</td>
</tr>
<tr>
<td>C</td>
<td>9.7.3.</td>
<td>Strengthen partnership and engagement with conservation associations.</td>
</tr>
</tbody>
</table>

Standard FSC STD 30-005

| D    | 3.1.3.              | Complement general membership conditions by defining SLIMF/non-SLIMF and membership conditions as stated in Procedure P0031. |

Auditors’ comments:

A: The description of biodiversity in the booklet does not clearly state the related environments to be taken into account (heath lands, peat bogs, wet or humid meadows, rocky cliffs, etc.).
B: There is no central list of first-aid kits to make it possible to monitor validity dates.

C: To enhance the expertise of the sustainable management unit, it would be necessary to strengthen engagement with conservationists.

D: Harmonize information on internal procedures and general membership conditions sent to owners.

9.6 - Proposal of conclusion on whether the candidate entity achieved or not the required level of conformance

CBB has established a forest management system that complies fully with FSC standards tailored to the French context, with regards to SLIMF and non-SLIMF estates.

CBB developed the necessary tools to award FSC certification based on reliable management systems, since it has been ISO 9001 and ISO 14001-certified for many years. An undeniable asset of the new organization in place at CBB is the creation of the sustainable management unit in charge of drafting the management booklet and monitoring SLIMF and non-SLIMF groups.

The minor gaps observed during the audit are not of a nature to prevent the certification of CBB. Hence, the audit team recommends CBB for the award of FSC certification in the context of SLIMF and non-SLIMF group certification.

Following the findings of the initial audit and the lack of any major non-compliance, the audit team recommends that CBB be awarded the FSC certificate based on BVC standards for France (RF03 FSC GF France v3.3) and FSC STD 30 005 V1 benchmark for group management for the entire certification surface area.

10 - Certification decision

Following the initial audit conducted from 5 to 9 December 2011, Bureau Veritas Certification forest-timber certification committee, meeting on 7 February 2012, deliberated as follows:

Deliberation: Having reviewed the initial audit report referenced “AR120131FR FSC GF CBB A1 V10 [31 01 2011]”, Bureau Veritas Certification hereby decides to award Comptoir des Bois de Brive (CBB) the FSC FM/CoC certificate.

This certificate is issued for a 5-year period, on condition that Comptoir des Bois de Brive fulfils the 6 minor Corrective Action Requests within the required timeline stated in the audit report and before the next surveillance audit.

The Certification Committee draws the attention of CBB on the need to adapt the group’s management capacities to its growing membership that is expected to rise steadily during the lifetime of the FSC FM/CoC certificate awarded to CBB.
Revised on 9 January 2012, reviewed on 15 January 2012 and finalised on 20 February 2012

FSC FM Certification Manager,  Lead Auditor,

Vincent PELÉ  Damien SCHMUTZ
B. Surveillance audit No. 1

11 - Basis of evaluation

11.1 - Date of the surveillance evaluation

11.2 - Composition of the audit team

Lead Auditor (LA):

Auditor:
- Stéphane RIVAIN (Oréade-Brèche), FSC-qualified Forest Management Auditor for Bureau Veritas Certification, Forestry Expert, specialised in biodiversity and environmental issues, Independent Consultant.

11.3 - Standard(s) used

During the audits, we referred to the checklist. This latest version was updated on 22 September, 2009, and is available on www.certification.bureauveritas.fr or upon request from Bureau Veritas Certification.

12 - Information collecting modalities

12.1 - Description of the audit programme

<table>
<thead>
<tr>
<th>Time</th>
<th>ISO 9001</th>
<th>ISO 14001</th>
<th>FSC</th>
<th>Audited activities</th>
<th>Interviewed stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>9:00 am-9:30 am (1+2)</td>
<td>1.2 GP01</td>
<td>1.2 GP01</td>
<td></td>
<td>Opening meeting&lt;br&gt;Presentation of the audit, objectives and terms. &lt;br&gt;Potential audit programme adjustments.&lt;br&gt;Scope of application and exclusions.</td>
<td>FSC team Department Managers</td>
</tr>
</tbody>
</table>
### FSC Forest Management Certification
Certification Public Summary
Comptoir des Bois de Brive (CBB)

<table>
<thead>
<tr>
<th>Time</th>
<th>ISO 9001</th>
<th>ISO 14001</th>
<th>FSC</th>
<th>Audited activities</th>
<th>Interviewed stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>9:30 am-12 pm</td>
<td>5.1</td>
<td>5.2</td>
<td>4.2</td>
<td>Principles 1-8 Management team commitment</td>
<td>SC ER</td>
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<tr>
<td>(1+2)</td>
<td>5.3</td>
<td>5.4</td>
<td>4.3.3</td>
<td>Management team presentation of the 2011 new developments</td>
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<tr>
<td></td>
<td>5.5</td>
<td>5.6</td>
<td>4.4.1</td>
<td>Management team commitment</td>
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</tr>
<tr>
<td></td>
<td>6.1</td>
<td>4.4.3.</td>
<td>4.4.6</td>
<td>Resources, roles, responsibility and objectives</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>4.6</td>
<td>Customer focus and stakeholders. Communication</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Management review.</td>
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</tr>
<tr>
<td>12:30 pm-1:00 pm</td>
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<td></td>
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<td>Lunch break</td>
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<tr>
<td>1:30 pm-2:30 pm</td>
<td>7.1</td>
<td>7.4</td>
<td>4.3.2</td>
<td>Principles 4-6-7-8 Machinery pool operations &amp; management</td>
<td>NV</td>
</tr>
<tr>
<td>(1)</td>
<td>7.5</td>
<td>8.2</td>
<td>4.4.6</td>
<td>Planning. Strategic objectives.</td>
<td></td>
</tr>
<tr>
<td>2:30 pm-3:30 pm</td>
<td>6.2</td>
<td>8.2</td>
<td>4.4.2</td>
<td>Principle 4 Training/communication</td>
<td></td>
</tr>
<tr>
<td>(1)</td>
<td></td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td>3:30 pm-5:00 pm</td>
<td>4.3.1.</td>
<td>4.3.3.</td>
<td>4.3.2.</td>
<td>Principles 1-2-4-6-7 SME Environmental issues.</td>
<td>ER</td>
</tr>
<tr>
<td>(1)</td>
<td>4.3.2.</td>
<td>4.5.2.</td>
<td>4.4.7</td>
<td>Environment quality management programmes.</td>
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<td>Legal and other requirements.</td>
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<td></td>
<td>Compliance assessment. Emergency situations.</td>
<td></td>
</tr>
<tr>
<td>5:00 pm-6:00 pm</td>
<td>7.1</td>
<td>7.4</td>
<td>4.3.2</td>
<td>Principle 8 PEFC/FSC CoC Log procurement/trading</td>
<td>GH Bernadette Baio (Assistant)</td>
</tr>
<tr>
<td>(1)</td>
<td>7.5</td>
<td>8.2</td>
<td>4.4.6</td>
<td>Procurement. Planning Strategic objectives. Audit.</td>
<td></td>
</tr>
<tr>
<td>6:00 pm-7:00 pm</td>
<td>7.1</td>
<td>7.4</td>
<td>4.3.2</td>
<td>Principles 4-6-7-8 Logging. Procurement. Planning. Strategic objectives. Audit.</td>
<td>SD</td>
</tr>
<tr>
<td>(1)</td>
<td>7.5</td>
<td>8.2</td>
<td>4.4.6</td>
<td>Procurement. Planning. Strategic objectives. Audit.</td>
<td></td>
</tr>
<tr>
<td>1:30 pm-7:00 pm</td>
<td>Principles 2-5-6-7 9-10</td>
<td>FSC FSC document analysis</td>
<td>VF</td>
<td></td>
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<td>(2)</td>
<td></td>
<td></td>
<td></td>
<td>Breeing meeting.</td>
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<td>7:00 pm-7:15 pm</td>
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<td>(1+2)</td>
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</tr>
</tbody>
</table>

**Tuesday 27/11/12**

Audit team: Damien SCHMUTZ (1) – Stéphane RIVAIN (2)
### Visit of the FSC IP SA property in Saillat

Visits of the FSC property.

- Land parcel 5, mechanised felling, regular mixed high forest mixture, surface area of 4.72 ha. Logging site in operation.
- Departure for Montbron (1 h).

### Lunch with the local team

Lunch with the local team

### Corporate Office Audit, Poisson sector

Corporate Office Audit, Poisson sector

### Visit of the PEFC logging sites in MANSEL

Visit of the PEFC logging sites in MANSEL (standing timber and timber in the process of being felled), “lieu-dit Châlet de la Boixe”, 206 ha, land parcel 8, oak coppice to high forest conversion (100 stems/ha).

### Visit of Villejésus logging site

Visit of Villejésus logging site (FSC-timber not felled yet), 8.3 ha, Znieff type 1 land parcel, oak coppice to high forest conversion (150 stems/ha).

- Owner: Ms. Anne Marckert CBB 12-043.
- Departure for Saillat.

### Visit of logging sites:

- **Town of Montalambert**
  - Ms. de Menthon CBB 12027
  - Logging site 80229
  - Surface 2.998 ha, land parcel 1.7 ha chestnut trees. Mechanised coppice.
  - Mr. Rouffaud CBB12055
  - Logging site 80214
  - Property 47 ha, non-SLIMF.
  - Oak coppice cutting over a surface area of 2 h. Mechanised process: sub-contractor Pascal Mesrine, John Deere 1270 D
  - Town of Champagne-Mouton (Charente Department; 16).
  - Logging site 80 2205, Ms. Braquet.
  - Property of 3.5 ha, cut over 2 ha. Mechanised coppice clear-cut.
  - In any case, a few reserves are preserved.

- **Saillat audit/CBB weighbridge.**
**Wednesday 28/11/12**

Audit team: Damien SCHMUTZ (1) – Stéphane RIVAIN (2)

<table>
<thead>
<tr>
<th>Time</th>
<th>ISO 9001</th>
<th>ISO 14001</th>
<th>FSC</th>
<th>Audited activities</th>
<th>Interviewed stakeholders</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00 am-9:00 am</td>
<td>7.1</td>
<td>4.3.3</td>
<td>Principles 2 to 9 Group management</td>
<td>Corporate Office Audit, Provot sector</td>
<td>DP</td>
</tr>
<tr>
<td></td>
<td>7.5</td>
<td>4.4.3</td>
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<td>7.6</td>
<td>4.4.6</td>
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<td>DP</td>
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<td>4.5.1</td>
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<td>8.2</td>
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<td>8.2</td>
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<tr>
<td>1:30 pm-6:00 pm</td>
<td>PEFC/FSC</td>
<td>CoC</td>
<td>CW/DDS</td>
<td>Document analysis. Multisite. Recordings (material balance). Procurement, sales, billing. Trademark use.</td>
<td>ER</td>
</tr>
<tr>
<td></td>
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<tr>
<td>6:00 pm-7:00 pm</td>
<td>.</td>
<td>8.2.1</td>
<td></td>
<td>Customer focus, customer satisfaction.</td>
<td>SD JMY</td>
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<tr>
<td>8:00 am-11:00 am</td>
<td>.</td>
<td>.</td>
<td>Principles 2 to 9 Group management</td>
<td>Florent Courtin sector Groupement forestier des bois de Loret (Timber Forestry Group). Mr. Pierre de Ribère des Gardes in Nuret-le-Ferron (Indre Department; 36), meeting with 2 employees. CBB 12020 non-SLIMF, 47.68 ha land parcels 1-7-6 for 15 ha, coppice clear-cutting with preservation of reserves.</td>
<td>Florent Courtin</td>
</tr>
<tr>
<td></td>
<td>7.1</td>
<td>4.3.3</td>
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<td>7.5</td>
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<td>7.6</td>
<td>4.4.6</td>
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<td>4.4.6</td>
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<td>4.5.1</td>
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<td>8.2</td>
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<tr>
<td>11:00 am-12:30 pm</td>
<td>.</td>
<td>.</td>
<td>Principles 2 to 9 Group management</td>
<td>Jean-François Thomas and Ludovic Pottier (TEF) sector Property of Ms. Chantal Richar in Fléré-la-Rivière</td>
<td>Jean-François Thomas and Ludovic Pottier (TEF)</td>
</tr>
</tbody>
</table>
**Thursday 29/11/12**

**Audit team Damien SCHMUTZ (1) – Stéphane RIVAIN (2)**

<table>
<thead>
<tr>
<th>Time</th>
<th>ISO 9001</th>
<th>ISO 14001</th>
<th>FSC</th>
<th>Audited activities</th>
<th>Interviewed stakeholders</th>
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</thead>
<tbody>
<tr>
<td>8:00 am-9:00 am</td>
<td></td>
<td>4</td>
<td>4</td>
<td>Safety management.</td>
<td>PF</td>
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<td>(1)</td>
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<tr>
<td>9:00 am-10:30 am</td>
<td>6.1</td>
<td>4.4.6</td>
<td>8</td>
<td>Monitoring and measurements. Internal audits.</td>
<td>ER</td>
</tr>
<tr>
<td>(1)</td>
<td>6.3</td>
<td>4.4.7</td>
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<td>6.4</td>
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<td>4.4.7</td>
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<tr>
<td>10:00 am-11:00 am</td>
<td>4.1</td>
<td>4.1</td>
<td>2</td>
<td>Claim handling.</td>
<td>ER</td>
</tr>
<tr>
<td>(1)</td>
<td>4.2</td>
<td>4.4.4</td>
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<td>GP01</td>
<td>4.4.5</td>
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<td>8.2.3</td>
<td>4.5.4</td>
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<tr>
<td>11:00 am-12:00 pm</td>
<td>4.2</td>
<td>4.4.4</td>
<td>Document management.</td>
<td>ER</td>
<td></td>
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<tr>
<td>(1)</td>
<td>4.4.5</td>
<td></td>
<td></td>
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<tr>
<td>8:00 am-10:00 am</td>
<td></td>
<td>All principles FSC</td>
<td>Complements/on-site visits. Document review. Monitoring.</td>
<td>VF</td>
<td></td>
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<tr>
<td>(2)</td>
<td></td>
<td>FSC</td>
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<tr>
<td>10:00 am-12:00 pm</td>
<td></td>
<td>FSC STD 30005</td>
<td>Group management. Presentation – Owner audit-verification.</td>
<td>VF</td>
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<tr>
<td>12:30 pm-2:00 pm</td>
<td></td>
<td>Lunch break</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>2:00 pm-4:00 pm</td>
<td></td>
<td>---</td>
<td>Preparation of conclusions.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4:00 pm-4:30 pm</td>
<td></td>
<td>Closing meeting. Presentation of conclusions per the different standards.</td>
<td>Department Manager</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
12.2 - Total man-days for the surveillance audit

Declaration of the number of man-days spent in evaluating the forest entity.
- pre-evaluation and other preparatory work: 0.5 day.
- Time spent in reviewing documents, records, interviewing people and stakeholders as well as on-site visits: 4 days.
- Formatting and presentation of findings: 2.5 days.

i.e. a total of 7 man-days.

12.3 - On-site visit(s)

During the audit we visited the following sites:

<table>
<thead>
<tr>
<th>Dep.</th>
<th>Town</th>
<th>Forest stand</th>
<th>Clear-cut and natural regeneration</th>
<th>Forest stand improvement</th>
<th>Environmental constraints</th>
<th>Social constraints</th>
</tr>
</thead>
<tbody>
<tr>
<td>87/16</td>
<td>Saillat</td>
<td>Regular high forest mixture CBB12-050</td>
<td>No</td>
<td>Yes</td>
<td>No specific constraints Forest stand adjacent to IP industrial site</td>
<td>In the long term plan to develop an educational path to raise awareness among members and visitors on responsible forest management</td>
</tr>
<tr>
<td>16</td>
<td>Villejésus</td>
<td>Oak coppice CBB 12-043 Owner: Marckert 8.3 ha</td>
<td>No</td>
<td>Oak coppice to high forest conversion (150 stems/ha)</td>
<td>Znieff type 1.</td>
<td>No</td>
</tr>
<tr>
<td>79</td>
<td>Montalambert</td>
<td>Chestnut tree coppice CBB 12-027 Owner: de Menthon 2.998 ha</td>
<td>Yes, over 1.7 ha (mechanised)</td>
<td></td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>79/16</td>
<td>Montalambert</td>
<td>Chestnut tree coppice CBB 12-055 Owner: Rouffaud 47 ha non-SLIMF</td>
<td>Yes, over 2 ha (mechanised)</td>
<td></td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>16</td>
<td>Champagne-Mouton</td>
<td>Chestnut tree coppice CBB 12-001 Owner: Braquet 3.5 ha</td>
<td>Yes, over 2 ha (mechanised)</td>
<td></td>
<td>Steep incline</td>
<td>No</td>
</tr>
<tr>
<td>36</td>
<td>Tranzault</td>
<td>Regular hardwood high forest CBB 12-060 Owner: Léger 13.46 ha</td>
<td></td>
<td>Improvement (marking out in progress)</td>
<td>Classified forested area</td>
<td>Local Town Planning (green zone) DDT declaration</td>
</tr>
<tr>
<td>36</td>
<td>Montipouret</td>
<td>Regular hardwood high forest CBB 12-031 Owner: de Saint-Salvy</td>
<td></td>
<td>Improvement cut over 8.036 ha</td>
<td>Wetland and water stream protection</td>
<td></td>
</tr>
</tbody>
</table>
### 12.4 - Document review

List of reviewed documents:
- MO 06022 procedure, index B.
- Group membership procedure.
- Vegetation catalogue for the Millevaches en Limousin Regional Nature Park (PNR).
- Logging site sheets.
- Management handbooks.
- New website.
- 1210 CBB safety reporting (Excel file).
- 2011-2012 Management review – environment.
- Sustainable management policy.
- 110202 Accreditation agreement.
- 131031 FSCCBB membership update on 30/10/12.
- Sub-contractor list.
- Audit schedule FSC CBB 11 002 and 11 004.
- Audit planning.
- M06022 Operational procedure for the development of a management handbook.
- Presentation sheets for related environments and management measures for wet moorlands, dry moorlands, edges, pools and ponds, riverine forested areas, sources, seeps and streams, peat bogs.
- Forward-looking training schedule, 2013.
- Strategic objectives, 2012.
- CBBDOC01005 work agreement and logging site sheet.
- Environmental specifications.

Traceability:
- P00030 FSC multisite.
- P00029 FSC chain of custody.
- P00023 PEFC forest certification system.
- P00031 FSC forest certification system.
- P00028 FSC controlled timber.
- 121202 FSC PEFC multisite internal audit report.
- 120809 District analysis for CW.
- 2009010 FSC 2012IP monitoring, Saillat.
- CBB DOC 06086 Risk assessment of 19.08.12.
- Purchase and sale invoice.

12.5 - Interviews during this audit

During this audit we interviewed the following staff members:
- Emmanuel Ripout, Business Support Manager.
- Vincent Fidon, Sustainable Management Officer.
- Aurélie Lafuente, Sustainable Management Technician.
- Patricia Lachaud, HR Manager.
- Saïd Difle, Logging Manager.
- Gilbert Hoellinger, Log Trading Manager.
- Bernadette Baïo, Log Trading Assistant Manager.
- Stéphane Poujade, Management Controller.
- Jean-Marc Yvernault, Supply Chain and Trading Manager.
- Philippe Fouquet, Safety Manager.
- Dominique Troubadis, Payroll Department.
- Corinne Doffe, Training Monitoring.
- Eymeric Botin, Quality Controller, Saillat.

Agency:
- Emmanuel Poisson, CSE.
- Vincent Moreau, TEF.
- Antoine Béchon, TEF.
- Damien Provot, CSE.
- Florent Courtin, CSE.
- Jean-François Thomas, CSE.
- Ludovic Pottier, TEF.
Owners:
- Patrick Théret, CBB12-013.

**Interview conclusion:**
The interviews were constructive. The interviewees were able to speak freely. They were able to describe their work, the implementation of procedures within FSC and the difficulties they face in their respective positions.

**12.6 - Consultation with stakeholders since the last audit and during the current audit**

The following stakeholders were interviewed during this audit:
- Sylvestre Couderc, Forestry Expert.
- Bruno Jacquet, CRPF Ile-de-France/Centre.

**Conclusion of discussions:**
- The approach is recognised as courageous and innovating. Regret was expressed as to the following: the environmental objectives were not appropriately emphasised when the process was introduced.
- It was also acknowledged that the FSC process and the management handbook helped to foster thinking and enhance the quality of intervention.

**12.7 - FSC trademark use control**

No mention of the trademark on products. All promotional uses of the trademark "on invoices, handbook/communications, website" were validated by BVC as part of the IP multisite certification. This was confirmed during the CoC audit.

**12.8 - Controversial elements**

No controversial matter was reported to the auditors.

**12.9 - Change in the management of the certified company**

**Organisational background:**
- No major change in the existing organisation. However, the following was noted:
  - Ms. Aurélie Lafuente joined the sustainable development unit in mid-November, taking over Mr. Maxime Aubert.

Support functions have been reinforced with:
- The arrival of Mr. Philippe Fouquet as health & safety instructor. Safety is a strategic objective of the utmost importance for CBB and, more generally speaking, for IP (Life project). The safety action plan is monitored by a steering committee reporting monthly to the European directorate. Please refer to the attached management review on safety 2011-2012 and safety reporting plans.
- The arrival of Mr. Nicolas Vernet, assistant to Said Diffle, in charge of machinery pool management and improvement. Improving the
machinery pool is a key objective for CBB. We were presented with the improvement project during this audit (optimising logging site organisation in relation with the sustainable development unit to take into account FSC aspects; management involvement with equipment allocation based on needs rather than on a per-sector approach).

Economic background:

CBB's by-laws (68 employees for €70 M in sales for 2011) have changed since the last audit: CBB is now a simplified joint stock company (previously a general partnership).

Timber quantities mobilised in 2012 by CBB have declined since last year as a result of a weaker business climate in the paper industry and of the shutting down of the Saillat plant for maintenance purposes.

In 2011, CBB timber deliveries were distributed as follows:

- Saillat: 1.34 K tons
- Sawmills: 46 K tons
- Heating: 22.5 K tons
Other industries and bioenergy: 35 K tons

**FSC status in late October:**
- 79 owners (including 23 in progress)

1,200 ha.

<table>
<thead>
<tr>
<th>Number of owners</th>
<th>0 to 10 ha</th>
<th>10 to 25 ha</th>
<th>25 to 50 ha</th>
<th>&gt;50 ha</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Forest surface (Ha)</td>
<td>210</td>
<td>347</td>
<td>410</td>
<td>241</td>
<td>1208</td>
</tr>
<tr>
<td>Average surface</td>
<td>4.88</td>
<td>15.79</td>
<td>41.00</td>
<td>60.25</td>
<td>15.79</td>
</tr>
</tbody>
</table>

Produced volumes (since the certification process)
765 ha in operation yielding the following outputs:
- 34,500 tons of industrial wood (14,900 tons delivered to this day)
6,300 tons of hardwood timber.
6,400 tons of softwood timber.
2,300 tons of firewood.

- 2012 forecast: 85 members

Technical review based on 5 FSC members declared to BVC (signed off management handbook):
- 84% SLIMF:

<table>
<thead>
<tr>
<th>Number of members</th>
<th>Year 2012</th>
<th>Year-to-date</th>
</tr>
</thead>
<tbody>
<tr>
<td>SLIMF</td>
<td>40</td>
<td>48</td>
</tr>
<tr>
<td>Non-SLIMF</td>
<td>8</td>
<td>8</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Certified surfaces</th>
<th>Year</th>
<th>Year-to-date</th>
</tr>
</thead>
<tbody>
<tr>
<td>SLIMF</td>
<td>420.82</td>
<td>484.95</td>
</tr>
<tr>
<td>Non-SLIMF</td>
<td>367.37</td>
<td>367.37</td>
</tr>
<tr>
<td>TOTAL</td>
<td>798.19</td>
<td>852.32</td>
</tr>
</tbody>
</table>

- Distribution according to forest stand type:

- Potential impact on 31% of the surface area.
• HCVFs account for 8% of the surface area (67.33 ha)

12.10 - Surveillance audit closing meeting

The closing meeting took place with all members of the company corporate team.

The audit team reminded the surveillance audit objective (observation of minor CARs, evaluation on the basis of a number of selected criteria as part of this surveillance audit). The closing system of minor CARs or changing system from a minor CAR to a major CAR was explained.

The conduct of the audit was presented as well as the strengths and weaknesses of the company. Each of the minor CARs (2) and recommendations were described and explained.
All CARs and recommendations were validated by the company.

### 13 - Audit team observations

#### 13.1 - Actions taken in order to answer to the Corrective Action Requests from the previous audit

<table>
<thead>
<tr>
<th>CAR #</th>
<th>M</th>
<th>m</th>
<th>Requirement</th>
<th>CAR description</th>
<th>Actions taken by the entity to close the CAR</th>
<th>Date of closure</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>m</td>
<td>4.4.3 and 2.1</td>
<td>Complete the M006022 procedure &quot;Livret de gestion FSC&quot; (FSC Management Handbook) specifying the consultation stage with stakeholders and naturalists (for non-SLIMF).</td>
<td>The stakeholder consulting step was added at two stages of the M006022 procedure. Before field work, based on regulatory data, and after field work stage in case of specific observations. During this audit we noted that this procedure had been successfully implemented by the sustainable development unit (see attached procedure).</td>
<td>29/11/12</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>m</td>
<td>6.1.3 and 7.1.9</td>
<td>Formalise the presentation sheets on conservation measures regarding related environments to be attached to the management handbook and work agreements.</td>
<td>Presentation sheets for related environments and associated management measures were prepared for dry moorlands, wet moorlands, pools and ponds, peat bogs, sources, seeps and edges (see appendix).</td>
<td>29/11/12</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>m</td>
<td>8.3.7</td>
<td>Determine and implement within the agency how FSC statements on agreements and sale documents for sold timber should be communicated. FSC 100%.</td>
<td>Currently no 100% FSC timber is sold. Logs coming from FSC cuts and sold as such have only been industrial wood for the Saillat plant until now. However, the P00029 procedure was modified to take into account that aspect. Staff members will be trained as soon as 100% FSC-certified timber is sold.</td>
<td>29/11/12</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>m</td>
<td>9.1.6</td>
<td>Finalise the list and fact sheets for species, forest habitats and associated habitats in relation with experts and naturalist associations.</td>
<td>Fact sheets are created with Charente Nature and Nature Centre. Fact sheets have been developed for cavity trees, big nest trees, dead and senescent trees, river banks, ruts and pools, peat bog areas and wooded areas with or without scattered orchids, chalk grasslands and moorlands.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>m</td>
<td>2.3</td>
<td>Reinforce communication and awareness-raising tools to help area managers, logging technicians and</td>
<td>The sustainable development unit has reinforced training and awareness efforts within CBB. During this audit we</td>
<td>29/11/12</td>
<td></td>
</tr>
</tbody>
</table>
### CAR #6

**Requirement: CAR description**

- CAR 6M8.7: Determine the criteria qualifying minor or major deviations during audits with owners.

**Actions taken by the entity to close the CAR**

- Noted that logging technicians showed more self-confidence and sounded better informed when presenting the FSC process. The approach of area managers with owners is more construed and compelling.

**Date of closure:** 29/11/12

---

### 13.2 - Actions taken in order to answer to previous recommendations

<table>
<thead>
<tr>
<th>OBS #</th>
<th>Requirement</th>
<th>Recommendation</th>
<th>Measures taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>6.2.4</td>
<td>Define the related environments in the P0031 procedure.</td>
<td>Related environments (moorlands, peat bogs, wetlands, rocky cliffs...) are now listed in the P0031 procedure (appendix).</td>
</tr>
<tr>
<td>B</td>
<td>4.2.6</td>
<td>Reinforce first-aid and &quot;chopped-off limb&quot; kit monitoring.</td>
<td>Mr. Philippe Fouquet, Safety Instructor, implemented a monitoring process for all first-aid kits so as to check use-by dates.</td>
</tr>
<tr>
<td>C</td>
<td>9.1.3</td>
<td>Reinforce partnerships and exchanges with naturalist associations.</td>
<td>Meetings were organised with Limousin Regional Nature Park, Brenne Regional Nature Park, France Nature Environnement, Charente Nature and Famille de France. Exchanges take place between CBB and the relevant associations so they can get involved as service providers as part of biodiversity diagnosing. (Contract signed with Nature Centre: in progress with Poitou-Charentes Nature).</td>
</tr>
<tr>
<td>D</td>
<td>3.1.3</td>
<td>Complete the membership terms &amp; conditions by adding the definition of SLIMF/NON-SLIMF as described in the P00031 procedure.</td>
<td>Membership terms &amp; conditions have been completed to address this observation.</td>
</tr>
</tbody>
</table>
13.3 - Evaluation of the general conformity level of the entity

**Strengths**

The Strengths observed during the audit include the following:

- Internal strategy deployment. Management reviews (quality, health & environment) and monitoring committee. Meeting interconnections in the field. Internal communications (one-on-one meeting, training plan…).
- Synergy between the ISO and FSC FM processes.
- Regulatory monitoring and regulatory compliance (environment and social).
- Creation of support functions (equipment management and safety instruction). Coaching/safety approach.
- Manufacturing Excellence Project (project management deployment tools to promote total quality).
- "Machinery pool performance improvement" project management.
- Sub-contractor monitoring and assessment.
- Educational path implementation project in Saillat.
- High level of uptake of the FSC FM certification by area managers and logging technicians. More self-confident and informed line of speech with owners.
- Supporting role of the sustainable development unit with area managers and logging technicians to recruit new FSC Group members.
- The quality level of the management handbook and, on a larger scale, the quality level of documents implemented for FSC/FM (the graphic charter initiated as part of the FSC process has expanded to new documents).
- Quality level of forestry operations both in terms of silvicultural choices and work completion.

**Weaknesses**

No weaknesses have been identified within the existing organisation. However, please see the two minor deviation cases and related recommendations.

13.4 - Potential change in the scope of the certificate

Change in CBB by-laws: changed from a general partnership to a simplified joint stock company.

Change in the certified surface area: 850 ha in late October 2012 (refer to the Excel file – FSC IP CBB member list update).

14 - Proposal regarding the certification decision

14.1 - Description of new recommendations

A few recommendations were made after this audit:
<table>
<thead>
<tr>
<th>No.</th>
<th>Indicators</th>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>E</td>
<td>7.1.2</td>
<td>Give an overview of the forestry, environmental and social objectives in the management handbook.</td>
</tr>
<tr>
<td>F</td>
<td>7.3.2</td>
<td>Make sure that the PBI (Potential Biodiversity Index) is correctly understood by all area managers and logging technicians to make it easier for them to explain them to owners.</td>
</tr>
<tr>
<td>G</td>
<td>8.2.2.1</td>
<td>The PBI calculated during owner audits is not recorded in the monitoring database.</td>
</tr>
<tr>
<td>H</td>
<td>1.3.1</td>
<td>Complete the definition of type 1 HCVF taking into account the RAMSAR data.</td>
</tr>
</tbody>
</table>

**Comments**

Observation E:
The management handbooks lack an overview (in a table) on the forestry, environmental and social objectives for the relevant forestry management unit. Such a summary would also help area managers and logging technicians to present them more clearly.

Observation F:
The audit team noted that PBI understanding was not consistent from one sector to the next. Area managers and logging technicians should be reminded of PBI reading and analysis keys in order to better explain them to owners.

Observation G:
The audit team noted that the PBI, which is determined during the field surveys performed prior to the development of the management handbook, had not been recorded in the monitoring file set up for the monitoring process.

Observation H:
The presentation of the different HCVF types does not include RAMSAR areas although such areas exist within CBB's scope of intervention.

### 14.2 - New Minor Corrective Action Requests

<table>
<thead>
<tr>
<th>Nº</th>
<th>Criteria</th>
<th>Description</th>
<th>Resolution date</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>4.2.3</td>
<td>Always accurately complete the risk analysis table and the diagrams showing the risks specified in the logging site sheet.</td>
<td>Next surveillance audit (AS4).</td>
</tr>
<tr>
<td>8</td>
<td>7.3.2</td>
<td>Raise awareness area managers and logging technicians on forestry habitat and species fact sheets.</td>
<td>Next surveillance audit (AS4).</td>
</tr>
</tbody>
</table>

**Comments on minor CARs:**

**Minor CAR No. 7:**
During visits to the logging sites (Châlet de la Boixe and Saillat) we noticed that the risk table and related diagrams were not systematically and consistently completed and filled in.
This is a minor CAR as this was not always the case.

**Minor CAR No. 8:**
Fact sheets have not been handed out to the relevant people yet to raise awareness on better integrating biodiversity issues when preparing logging sites. This is a minor CAR as a momentum was created and distribution to field staff members has been organised.

14.3 - Major CARs

No major CAR was made during this audit.

14.4 - Conclusions of the audit team

The forest management system established by CBB still fully addresses the FSC standard adapted to the French context in SLIMF and NON-SLIMF properties. This year CBB has allocated additional human resources to strengthen support functions, which has helped the company to address the main weaknesses identified during the prior audit. The two minor deviations pointed out during this audit are not such as to hamper the CBB certification process. Therefore, the audit team recommends the extension of the FSC certification for CBB as part of a joint certification for a group of SLIMF and non-SLIMF owners.

15 - Certification decision

In the light of the elements provided by the company and found by the audit team during this surveillance audit to close the Corrective Action Requests the Wood and Forestry Department decided to extend the FSC certificate for CBB. Nevertheless, in order to maintain its compliance with the FSC certification requirements, the company should implement the appropriate actions within the scheduled deadline (next surveillance audit) in order to fulfil the minor Corrective Action Requests.


FSC FM Certification Manager, Lead Auditor,

Vincent PELÉ Damien SCHMUTZ
C. Surveillance audit No.2

16 - Basis for evaluation

16.1 - Date of surveillance audit
9-13 December 2013

16.2 - Membership of the audit team

Lead auditor:
- Damien SCHMUTZ, (Arcanne), Qualified FCS forest management auditor and CoC for Bureau Veritas Certification, timber expert, independent consultant.

At the request of CBB and in agreement with BVC, Mr. Guillaume Dahringer of FSC France took part in this audit with an observer capacity until 11 December 13. He cosigned SF09 appended to this report.

16.3 - Standard(s) used

During this audit, we made reference to the checklist, the latest version of which was updated on 22 September 2009 and can be obtained from the website www.certification.bureauveritas.fr or upon request from Bureau Veritas Certification.

17 - Data collection arrangements

17.1 - Audit program

<table>
<thead>
<tr>
<th>Time</th>
<th>FM FSC</th>
<th>Group FSC</th>
<th>Auditor</th>
<th>Audited activities</th>
<th>People met</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:30-9:00</td>
<td></td>
<td>DS</td>
<td></td>
<td>Opening meeting</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Presentation of the audit, objectives and modalities</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Possible revision of the audit program</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Scope of the audit and excluded areas</td>
<td></td>
</tr>
<tr>
<td>9:00-10:00</td>
<td></td>
<td>DS</td>
<td></td>
<td>Management</td>
<td>S. Corée</td>
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<td></td>
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<td></td>
<td></td>
<td>Policies</td>
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<td></td>
<td>Resources</td>
<td></td>
</tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>Organization</td>
<td></td>
</tr>
</tbody>
</table>
## FSC Forest Management Certification

**Certification Public Summary**

Comptoir des Bois de Brive (CBB)

### Schedule

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity Description</th>
<th>Auditor</th>
<th>People met</th>
</tr>
</thead>
<tbody>
<tr>
<td>10:00-10:30</td>
<td>Training / Communication / HR</td>
<td>P. Lachaud</td>
<td></td>
</tr>
<tr>
<td>10:30-12:30</td>
<td>Desk review</td>
<td>ER/VF/AL/JD</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Management document</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Silvicultural routes</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Specifications</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>F &amp; F Habitats /species</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>HCVFs</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>TEFI</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Stakeholders</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12:30-14:00</td>
<td>Lunch break</td>
<td>ER/VF/AL/JD</td>
<td></td>
</tr>
<tr>
<td>14:00-16:00</td>
<td>Desk review</td>
<td>PF</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Management document</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Silvicultural routes</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Specifications</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>F &amp; F Habitats /species</td>
<td></td>
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<td></td>
<td>HCVFs</td>
<td></td>
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<tr>
<td></td>
<td>TEFI</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Stakeholders</td>
<td></td>
<td></td>
</tr>
<tr>
<td>16:00-16:30</td>
<td>Safety</td>
<td></td>
<td>PF</td>
</tr>
<tr>
<td>16:30-17:30</td>
<td>Staff representatives (work committee/OHSC)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>17:30</td>
<td>Transfer to Châteauroux</td>
<td>ER/VF/AL/JD</td>
<td></td>
</tr>
</tbody>
</table>

### Tuesday, 10/12/2013

<table>
<thead>
<tr>
<th>Time</th>
<th>Auditor</th>
<th>Audited activities</th>
<th>People met</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00-8:30</td>
<td>DS</td>
<td>Transfer to Nuret le Ferron</td>
<td></td>
</tr>
<tr>
<td>08:30-9:30</td>
<td>X DS</td>
<td>2012 Non-Slimf FSC (old): Property of Mr. De Ribéré</td>
<td>Alexandre Martin</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Activity: Site closed and delivered for the 1st tranche /timber for 2014 / owner absent</td>
<td></td>
</tr>
<tr>
<td>09:30-10:00</td>
<td>DS</td>
<td>Transfer to Pallau / Indre</td>
<td></td>
</tr>
<tr>
<td>10:00-11:00</td>
<td>X DS</td>
<td>NON-Slimf FSC / new : Property of Mr. Le Gouestre</td>
<td>Jean-François Thomas, Ludovic Pottier</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Activity: Site closed / owner informed and available for the audit</td>
<td></td>
</tr>
<tr>
<td>11:00-11:30</td>
<td>DS</td>
<td>Transfer to Verneuil / Indre</td>
<td></td>
</tr>
<tr>
<td>11:30-12:30</td>
<td>X X DS</td>
<td>SLIMF / new, Boué-Desperches : + meeting with owner.</td>
<td>Jean-François Thomas, Ludovic Pottier</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Activity: site closed / owner informed and available for the audit - contact her again on Monday evening</td>
<td></td>
</tr>
</tbody>
</table>
### Wednesday, 11/12/2013

<table>
<thead>
<tr>
<th>Time</th>
<th>FM FSC</th>
<th>Group FSC</th>
<th>Auditor</th>
<th>Audited activities</th>
<th>People met</th>
</tr>
</thead>
<tbody>
<tr>
<td>8:00-8:30</td>
<td></td>
<td></td>
<td>DS</td>
<td>Transfer to Montalembert</td>
<td></td>
</tr>
<tr>
<td>8:30-9:00</td>
<td>X</td>
<td></td>
<td>DS</td>
<td>Property of Mr. Rouffaud NON-SLIMF / old Activity: site closed. Already visited by S. Rivain during the last audit as was being exploited by Mesrine at the time the audit was conducted on an adjoining property.</td>
<td>Vincent Moreau</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Antoine Bechon</td>
</tr>
<tr>
<td>9:00-10:00</td>
<td></td>
<td></td>
<td>DS</td>
<td>Transfer to Angoulême sud-ouest: Roulet-St-Estèphe</td>
<td></td>
</tr>
<tr>
<td>10:00-11:00</td>
<td>X</td>
<td></td>
<td>DS</td>
<td>Property of Lafarge SLIMF / New Activity: Operations not yet started (planned for this winter /deliveries in 2014), booklet out for signature, marking of thinning by AL/JD/AB/VM</td>
<td>Vincent Moreau</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Antoine Bechon</td>
</tr>
<tr>
<td>12:00-13:00</td>
<td></td>
<td></td>
<td>DS</td>
<td>Transfer to Vanxains</td>
<td></td>
</tr>
<tr>
<td>13:00-14:00</td>
<td></td>
<td></td>
<td>DS</td>
<td>Lunch</td>
<td></td>
</tr>
</tbody>
</table>
### Thursday, 12/12/2013

<table>
<thead>
<tr>
<th>Time</th>
<th>Group</th>
<th>Auditor</th>
<th>Audited activities</th>
<th>People met</th>
</tr>
</thead>
</table>
| 8:00-9:00      | DS    |                   | Property of Mr. Sulzer  
NON-SLIMF / New  
Activity: Site closed/delivered. Possibility to meet the watchman of the property.                                                                                                                                   | Jason Carpentier, Stéphane Barrot |
| 9:00-9:30      | X     | DS                | Property of Mrs. Thomas  
SLIMF / Old  
Activity: EFFE Bois (Akkakaya), manual logger.                                                                                                                                                                        | Jason Carpentier, Stéphane Barrot |
| 9:30-10:15     | DS    |                   | Property of Mr. Manaux  
SLIMF/ new  
Activity: All wood felled. As at 21/11, 50% of the wood remains to be skidded: Skidding was interrupted at the end of week 46 (Bahri GOMEC) due to bad weather conditions | Paul Carrière, Guillaume Andelot |
| 10:15-10:45    | X     | DS                | Property of Mr. Laporte  
SLIMF/ new  
Activity: site closed/delivered                                                                                                                                                                                          | Paul Carrière, Guillaume Andelot |
| 10:45-11:45    | DS    |                   | Property of Mr. Sulzer  
NON-SLIMF / New  
Activity: Site closed/delivered. Possibility to meet the watchman of the property.                                                                                                                                   | Jason Carpentier, Stéphane Barrot |
| 11:45-12:15    | X     | DS                | Owner Balitrant  
SLIMF/ old (2 allowable cuts, mother and daughter)  
Activity: Ongoing operations, Logger, Garcia Dos Santos                                                                                                                                                                 | Paul Carrière, Guillaume Andelot |
| 12:15-13:00    | DS    |                   | Lunch                                                                                                                                                                                                             |                             |
17.2 - Total man-days of the surveillance audit

Statement on the total number of man-days spent evaluating the forest estate:
- Prior assessment and other preparatory work: 0.5 day
- Time spent to study documents, records, interviews of stakeholders and site visits: 4.5 days
- Editing and reporting: 2.5 days
This gives a total of 7.5 man/days.

17.3 - Site visit(s)

During the audit, the following properties were visited (except the Pleaux site which was undergoing a desk audit)
<table>
<thead>
<tr>
<th>No.</th>
<th>Location</th>
<th>Type</th>
<th>Area (ha)</th>
<th>Plots</th>
<th>Mix</th>
<th>Treatment</th>
<th>Logging Monitored</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>36</td>
<td>Nuret le Ferron “les bois de Loret”</td>
<td>Non-Slimf</td>
<td>47.68</td>
<td>8</td>
<td>Mix seed and coppice forest</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>36</td>
<td>Palluau</td>
<td>Stored coppice</td>
<td>47.18</td>
<td>No</td>
<td>No</td>
<td>Stored coppice logging</td>
<td>Exploitation of the coppice forest, oak reservation, less those withering</td>
<td>No</td>
</tr>
<tr>
<td>36</td>
<td>Verneuil sur Indre</td>
<td>Slimf</td>
<td>9.927</td>
<td>5</td>
<td></td>
<td>Softwood thinning (+ tied-ridging)</td>
<td>Natura 2000 (ZSC) “vallée de l’Indre”: 1 plot of HCVF natural offshoots 0.385ha + 1 strip of 5m on each side of the hiking trail on plots 1A/1B and 2B</td>
<td>GR46</td>
</tr>
<tr>
<td>36</td>
<td>Saint Michel en Brenne</td>
<td>Slimf</td>
<td>17</td>
<td></td>
<td></td>
<td>Final cut of regular oak seed forest in view of natural regeneration</td>
<td>Natura 2000 - Associated natural environment - dry heath, pond</td>
<td>Poaching issues</td>
</tr>
<tr>
<td>Site</td>
<td>Location</td>
<td>Forest Description</td>
<td>Management Details</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------</td>
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<td>------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>79</td>
<td>Montalembert</td>
<td>Oak coppice 1.5ha plot</td>
<td>SMP developed following an initial assessment in view of the integration into the FSC group</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>CBB-12-055 Allowable cut No. 80-214</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>Aussac Vadalle</td>
<td>SLIMF Spanish chestnut coppice on a “strip” for a total area of 1.94 ha</td>
<td>Cutting of the coppice but keeping of better grown beech and oak as well as the “nannyberry” precious species</td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Types 1 Znieff (HCVF) Consultation of DREAL and monitoring of compliance with prescriptions</td>
<td></td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Intervention outside the “March-September” period</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Pilot implementation of the instructions sheet</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>Roullet Saint Estèphe</td>
<td>SLIMF 10 ha of oak coppice Full ownership of 30 ha but not subjected to the SMP (no plot &gt;4ha)</td>
<td>3ha improvement cut (opening of tie-ridges, row spacing 1, line 1/3) File out for consultation at the city council (EBC, hiking, catchment)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24</td>
<td>Ponteyraud</td>
<td>NON SLIMF SMP 239 ha of which 167 ha of forest FSC annex to SMP Signed by the manager CBB 13-056</td>
<td>Registered site (Jemaye pond) Type 1 Znieff, Nature 2000 “vallée de la Double” Hiking trail</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24</td>
<td>La Bachellerie</td>
<td>SLIMF CBB 12-062 4.39ha Seed and coppice forest mix</td>
<td>Plot 2 (0.4ha) : Clear cutting of locust tree – natural regeneration Plot 1 (2.4ha) Clear cutting of maritime Hive were removed to allow for exploitation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plot</td>
<td>Location</td>
<td>Description</td>
<td>Action/Condition</td>
<td>Notes</td>
<td></td>
<td></td>
<td></td>
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<td>------------------------------------------------------------------------------</td>
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<td></td>
</tr>
<tr>
<td>19</td>
<td>Sevrière le Chateau</td>
<td>SLIMF CBB 13-019, 19.579 ha, 10 plots, Plot 1 Douglas + pine timber forest (on moist land)</td>
<td>1st softwood thinning: tie-ridge + selective cutting</td>
<td>Remaining wood to skid, site operations interrupted due to poor weather conditions</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>PBI 21</td>
<td>TEFI area</td>
<td>Other blocks of the property in Natura 2000 area “Gorges de la Dordogne”</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>Parlan</td>
<td>2 allowable cuts SLIMF CBB 12 053 (14.829ha) and CBB 12 054 (3.487ha)</td>
<td>Improvement cutting for oak and beech</td>
<td>Source on plot 3 identified and protected</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>2 identical and adjoining properties (mother and daughter)</td>
<td></td>
<td>Interview with the logger, José Garcia</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Normal high forest oak and beech + softwood</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>Pleaux (allowable cut not visited: desk audit)</td>
<td>SLIMF 8.885 in one stand of 5 plots CBB 13 052</td>
<td>First thinning of Scots pine and Douglas</td>
<td>1 cater course</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Softwood high forest, some hardwood coppice and natural offshoots on moist land</td>
<td></td>
<td>HCVF 2.78 ha</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(Plot 3: Steep slope and stream; Plot 5: moist area significant presence of tussock and sphagnum)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**17.4 - Desk review**

List of reviewed documents:
- Procedure MO 06022,
- Group membership procedure
- Site records
- Management booklet
- FSC forest management guide G 5/12/13
- FSC framework document for forest management
- Silvicultural specifications
- Operational specifications
- Website
- HCVF management record V4 9/12/13
- CBB reports on safety (excel file)
- Management review on the environment
- Sustainable management policy
- Management review on quality
- 110202 Licensing agreement
- 131031 update of FSCCBB membership register as at 30.11.13
- List of sub-contractors
- 2013 Environmental action plan
- 2013 safety action plan
- CBB FSC audit checklist
- Audit planning and summary of FSC controls
- M06022 Management booklet design methodology
- Associated natural environment record: forest clearing, forest edge, fallow and felling, dead and senescent trees, ponds, alluvial forest, heath, cavity trees,
- 2013 training program and 4014 provisional training program
- 2013 strategic objectives
- CBBDOC01005 works contract and site record
- Environmental specifications

Traceability:
- P00030 multi-site FSC
- P00029 chain of control FSC
- P00023 PEFC forest certification system
- P00031 FSC forest certification system
- P00028 controlled timber FSC
- 120809 District analysis for CW
- FSC selling invoice

17.5 - Interviews conducted during this audit

We interviewed the following staff during this audit:

- Emmanuel Ripout – Business support officer
- Vincent Fidon – Sustainable management officer
- Elodie Lafuente – Sustainable management staff
- Jennifer Dallot – Sustainable management staff
- Patricia Lachaud - HRO
- Saïd Difle – Forest exploitation officer
- Gilbert Hoellinger – Logs marketing officer
- Stéphane Poujade – Management controller
- Philippe Fouquet - Safety officer
- Corinne Doffe – Training supervision

Agency
- Alexandre Martin – CSE
- Thomas Dufournaud – TEF
- Jean-François Thomas – CSE
- Ludovic Pottier -TEF
- Vincent Moreau – TFE
- Antoine Béchon - TFE
- Jason Charpentier - CSE
- Stéphane Barrot – TFE
- Paul Carrière – CSE
- Guillaume Andelot – TFE

- Staff representatives
  - Dominique Lefebvre, assistant to the GM and secretary of the work committee
  - Brigitte Puitsdebois, assistant to the PCS
  - Thierry Chèze, CSE

- Owners:
  - Mr. Legouestre (Palluau- 36)
  - Mrs. Boué-Despreches (Verneuil sur Indre- 36)
  - Mr. Multon (Saint Michel en Brenne – 36)

- Sub-contractors:
  - Pascal Mesrine, Manager, operator of a power-driven circular saw
  - José Garcia, logger,

- Stakeholders :
  - Mr. Bruno Fillion, Poitou Charente Nature,
  - Mr. Yann Rolland, DREAL Poitou Charente,
  - Mr. Alain Persuy, Environmental engineer, CRPF Poitou Charente

- Outcome of interviews:
  Interviews were fruitful. Interviewees were able to express themselves freely. They described their work, implementation of procedures put in place in view of the FSC and difficulties faced in their respective functions.

17.6 - Stakeholder consultations since the first audit and during this audit

During this audit, we interviewed the following stakeholders:

- Mr. Bruno Fillion, Poitou Charente Nature. Intervention of the association to prepare habitat fact sheets in consultation with all PCN associations
- Mr. Yann Rolland, DREAL Poitou Charente, in charge of forest within Dreal: consulted on a case by case basis (type 1 ZNIEFF / Natura 2000)

- Mr. Alain Persuy, Environmental engineer, CRPF Poitou Charente, consulted for the validation of silvicultural routes and HCVF classification. Intervention on behalf of CBB in the context of the training (moist area, “Sol” day….)

Outcome of the consultation

- Good collaboration with CBB
- Clear and specific process
- Well established partnership

17.7 - Control of use of the FSC trademark

The trademark is not applied on products

Promotional use of the trademark “on invoices, booklets/communication, and website” is always approved by BVC within the framework of multi-site certification.

This was ascertained during the CoC audit

17.8 - Controversial issues

No controversial issue was reported to the auditors.

17.9 - Changes in the management of the certified entity

Organizational structure

No major change in the organization of CBB whose mission is to supply timber to meet the needs of the Saillat factory as well as those of local partners (sawmills, industries) by valorizing the whole gamut of forest products and promoting forest stewardship. FM FSC certification continues to develop and a new technician was added to the DD team (Mrs. Jennifer Dallot).

CBB has expanding its activities to numerous departments (03, 15, 16, 18, 19, 23, 24, 36, 37, 41, 45, 46, 63, 79, 86 and 87). These departments are divided across 10 offices as against 8 previously (headed each by an Operations sector chief (CSE) and assisted by a Forest exploitation technician – TEF). The Dordogne sector was divided into 2, to create a new Creuse Est sector.

CBB has 70 staff working on forest exploitation and wood trade. These two sectors are supported by different processes, especially a central logistics service located at Saillat.
At the regulatory level, one can cite the entry into force of the EU regulation on timber and the HSE decree (numerous controls by government services on the field).

**FSC situation as at end 2013**

Distribution of FSC members per surface area category
Distribution per type of stand
Cumulative numbers as at end 2013

<table>
<thead>
<tr>
<th>Property category</th>
<th>Number of owners</th>
<th>Area in ha</th>
<th>Average area</th>
</tr>
</thead>
<tbody>
<tr>
<td>SLIMF</td>
<td>116</td>
<td>1194</td>
<td>10.29</td>
</tr>
<tr>
<td>NON-SLIMF</td>
<td>17</td>
<td>1022</td>
<td>60.12</td>
</tr>
<tr>
<td></td>
<td>133</td>
<td>2216</td>
<td>16.66</td>
</tr>
</tbody>
</table>

Increase in 2013

<table>
<thead>
<tr>
<th>Property category</th>
<th>Number of owners</th>
<th>Area in ha</th>
<th>Average area</th>
</tr>
</thead>
<tbody>
<tr>
<td>SLIMF</td>
<td>52</td>
<td>607</td>
<td>11.67</td>
</tr>
<tr>
<td>NON SLIMF</td>
<td>6</td>
<td>457</td>
<td>76.17</td>
</tr>
<tr>
<td>Total</td>
<td>58</td>
<td>1064</td>
<td>18.34</td>
</tr>
</tbody>
</table>

- Volumes produced as at end 2013 and exploited area

<table>
<thead>
<tr>
<th>Entry products* (according to FSC codes STD 40 004a v2.0)</th>
<th>Species</th>
<th>100% FSC in 2012</th>
<th>Total production in 2012</th>
<th>100% FSC in 2013</th>
<th>Total production in 2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>W1.1 Hardwood</td>
<td>17692 T</td>
<td>167242 T</td>
<td>29651 T</td>
<td>181868 T</td>
<td></td>
</tr>
<tr>
<td>Softwood</td>
<td>4721 T</td>
<td>62022 T</td>
<td>10660 T</td>
<td>65336 T</td>
<td></td>
</tr>
</tbody>
</table>

FSC area exploited since the beginning of FSC certification: 2215ha of which 937ha in 2013

- Potential impact on 50% of the surface areas according to the following distribution:
- HCVFs cover 4% of the area (95.68 hectares)
17.10 - Report on the surveillance audit

The reporting meeting was held in the presence of the entire management of the company.

The audit team recalled the objective of the surveillance audit and explained the mechanism for closing or changing a minor CAR into a major one.

They indicated how the audit was conducted, as well as the strengths and weaknesses of the company. The minor CAR and observations were described and explained.

The findings were approved by the company.
18 - Observations of the audit team

18.1 - Actions undertaken to address previous minor non-compliance issues

<table>
<thead>
<tr>
<th>No</th>
<th>Requirement</th>
<th>CAR</th>
<th>Actions taken by the certified entity to close the CAR</th>
<th>Closing date</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>4.2.3</td>
<td>Systematically and rigorously fill the risk assessment table and the diagram situating the risks captured in the worksite sheet.</td>
<td>Mr. Fouquet, the safety officer, visits worksites every month to verify that internal safety procedures are applied properly, and especially that reality on the field is consistent with comments made on the sheets. On average, Mr. Fouquet spends 3 days per week touring worksites. Technicians and CSEs are trained on how to fill the form in the most consistent and understandable manner possible. The procedures as well as completion of the sheet are systematically explained to newly recruited employees. There is no contrary observation on the field: CAR closed</td>
<td>13/12/13</td>
</tr>
<tr>
<td>8</td>
<td>7.3.2</td>
<td>Sensitize CSEs and TEFs on forest habitats and species fact sheets.</td>
<td>Sensitization of CSEs and TEFs during tours by the DD Unit (evidenced by convening mail). The “forest habitats and species fact sheets” are annexed to the Management booklet. A new instructions sheet supplements the “works contract-worksite sheet” and summarizes all the requirements pursuant to the provisions of the Management booklet. That sheet is completed by the DD Unit, which thus ensures the continuous flow of information down to the field.</td>
<td>13/12/13</td>
</tr>
</tbody>
</table>

18.2 - Actions taken to respond to previous observations
<table>
<thead>
<tr>
<th>No</th>
<th>Requirement</th>
<th>Observations</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>7.1.2</td>
<td>Present briefly the forest, ecological and social objectives in the Management booklet</td>
<td>Version 15 of the Management booklet was amended on 5/12/12 (currently version 16). All copies of the 2013 Management booklet henceforth refer to the new chapter (chapter 6)</td>
</tr>
<tr>
<td>6</td>
<td>7.3.2</td>
<td>Ensure the PBI is properly understood by all CSE/TFEs so that they are better equipped to give explanations to the owners</td>
<td>This task was accomplished alongside sensitization on the habitats and species fact sheets (see response to CAR No. 8)</td>
</tr>
<tr>
<td>7</td>
<td>8.2.2.1</td>
<td>The PBI calculated while auditing the owners is not recorded in the monitoring database</td>
<td>Addition of the column “PBI score” and “PBI score during audits” in the monitoring file.</td>
</tr>
<tr>
<td>8</td>
<td>1.3.1</td>
<td>Complement the definition of type-1 HCVFs based on RAMSAR data.</td>
<td>Mainstreaming of Ramsar zoning: If zoning is done in the Natura 2000 area, then consult manager or operator of the site if it is an HCVF If only Ramsar zoning, then area linked to water are classified as HCVFs (precautionary principle) A new version of the “HCVF management” sheet was presented to us (V4 dated 9/12/13)</td>
</tr>
</tbody>
</table>

18.3 - Evaluation of the forest entity’s overall level of compliance

**Strengths**

The following strong points were noted during the audit:

- The audited sector and headquarters teams are involved in SM QE, documents are up-to-date and well kept, offices are properly tidied. There is operational mastery of core activities to fulfil CBB’s mission.
- The policy is disseminated internally through the development of the IAP (Integrated Action Plan). Joint meetings, community management.
- Documentation made available to TEFs and CSEs: ISO file, tips for field operations and crisis management manual
- Training and learning policy
- Job description, individualized objectives, delegation of signature/financial thresholds
- Great number of steering indicators and mastery of TCDs by audited personnel
- Correlating the various audits and controls on the field
Legal watch, assessment of compliance and dissemination/popularization of information internally

- Contracting (sub-contracting, trade, transport), quality and environmental specifications. Monitoring, evaluation and auditing of suppliers
- Research and development: review of softwood resources, ongoing development of a decision support tool for wood collection depending on the weather and soil structure in order to optimize resource management and reduce impact.

Good FSC FM certification process within CBB, which translates in:

- An expanding certified forest area
- Volume of certified wood delivered to Saillat ahead of projections
- Improved ownership of certification by field staff compared to the situation observed at the last audit
- Development of the DD Unit
- Responsiveness of CBB (plans of action were developed to address the weaknesses highlighted during the recent ISO audit conducted last October)
- Striking coherence between the DD Unit and field staff, and internally through crossed review of manuals and joint audit for calibration purposes. Quality of membership audits and reporting
- The quality of the initial analysis and relevance of the management booklet are acknowledged by the owners and stakeholders consulted. Quality of forest operations both in terms of silvicultural choices and in terms of works executed.

**Weaknesses**

No weaknesses were identified in the current organization. However, see the minor non-compliance issue and recommendations made.

18.4 - Potential change in the scope of the certificate

Change in the certified surface area.
19 - Proposals concerning the certification decision

19.1 - New recommendations
A few recommendations were made following this audit.

<table>
<thead>
<tr>
<th>N°</th>
<th>Indicators</th>
<th>Observations</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>6.7.1</td>
<td>Validate and implement the waste management plan</td>
</tr>
<tr>
<td>10</td>
<td>7.3.2/9.1.6</td>
<td>Finalize and implement “environmental instructions sheets with a view to FSC certification” that detail out the operations to be carried out in line with the provisions of the Management booklet</td>
</tr>
<tr>
<td>11</td>
<td>7.1.12</td>
<td>Consider options to facilitate group members’ ownership of the requirements contained in the “silviculture and exploitation” specifications</td>
</tr>
<tr>
<td>12</td>
<td>8.2.2.1</td>
<td>Specify in internal documents that the average PBI for a non-SLIMF estate is calculated based on the weighting of the various surface areas considered.</td>
</tr>
<tr>
<td>13</td>
<td>8.2.2.4</td>
<td>Consider completing the monitoring table by inserting therein the surface areas allocated for reforestation or enrichment.</td>
</tr>
<tr>
<td>14</td>
<td>3.1/9.2 (FSC STD 30005)</td>
<td>Clarify the FSC certification status of wood sold directly by a Group-member owner</td>
</tr>
<tr>
<td>15</td>
<td>FSC SDT 50001 V1.2</td>
<td>Ensure the FSC label is used properly before disseminating the “environmental instructions – FSC certification” sheet</td>
</tr>
</tbody>
</table>

Comments

Observation 9:
CBB activities generate very little waste. However, during the ISO 14001 audit, a weak point was identified regarding waste management, namely that field staff had to manage wastes themselves, some of which are classified as dangerous. Following the observations of the ISO audit, a plan of action was designed and presented to us. The plan is complete and shall be implemented after presentation thereof in early 2014 to the relevant staff.

Observation 10:
A draft new instructions sheet was presented to us during the audit. The DD Unit intends to operationalize this sheet to ensure that environmental, social and technical requirements are properly disseminated and consequently properly taken into account by field staff (CSEs and TFEs) as well as by forest logging sub-contractors.

Observation 11:
The “Silviculture and Exploitation” specifications annexed to the Management booklet and intended for owners are the same as those addressed to TEFs when work is outsourced. During discussions with owners, we noted that these specifications, which are perhaps too technical, were not well understood and we deem it important to suggest to CBB to review the content of the specifications to make them more user friendly.
Observation 12:
As a matter of fact, this is not mentioned in internal procedures.

Observation 13:
Here, the concern is filling the FSC monitoring table with data relating to reforestation/plantation in order to avoid painstaking search in the various Management booklets.

Observation 14:
The case, still hypothetical, where a Group-member owner may sell wood to a third party other than CBB is not clarified. In other words, can a Group-member owner sell wood certified 100% FSC to a third party? In light of indicator 9.2 of FSC STD 30 005, this is not possible and should be clearly stated as such.

Observation 15:
The draft instructions sheet (see observation 10) bears an FSC label, which is not consistent with the rules governing FSC trademark use. Though meant for internal use, the document may be disseminated to third parties and, consequently, must comply with the requirements of the FSC STD 50 0001 V1.2 standard.
19.2 - New minor Corrective Action Request

<table>
<thead>
<tr>
<th>N°</th>
<th>Criterion</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>9.1.2</td>
<td>Implement suitable intervention mechanisms to comply with the recommendations of stakeholders consulted within the framework of HCVF maintenance.</td>
</tr>
</tbody>
</table>

Comments concerning the minor CAR:

**Minor CAR No 9:**
This non-compliance issue follows on from field observation of the measures implemented by CBB in the Aussac Vadalle (CBB 12-045) allowable cut located in a type 1 Znieff. DREAL Poitou Charente was consulted within the framework of stakeholder consultation on HCVF and forwarded its recommendations by mail dated 3/9/12 (maintenance of a forest environment through the conservation of an underwood or of trees in the form of forest patches). The trees were marked for manual logging, also accounting for a new constraint raised by the owner regarding maintenance of the borders of the fenced estate. For want of a logger, it is a power-driven saw that was finally used and the recommendations of DREAL could not be entirely respected. It would also have been necessary to anticipate the constraints inherent to the specificity of the cut in order to adapt silvicultural operations or means of intervention (engineering). This default is deemed minor since the initial intention was to comply fully with the recommendations of DREAL, which moreover appreciates the methods of and relations with CBB.

19.3 - Major CARs

No major CAR was made during this audit.

19.4 - Conclusion of audit team

Desk review, field observations, interviews with staff, owners and stakeholders, all point to the fact that CBB’s forest management system continues to be fully compliant with the FSC standard tailored to the French context for SLIMF and Non-SLIMF estates.

The minor non-compliance issue highlighted during the audit is not one that can undermine CBB certification. Consequently, the audit team recommends that CBB’s FSC certification be upheld as part of group certification of SLIMF and Non-SLIMF owners.

Drafted on 1 February 2014, reviewed on 17 February 2014, finalized on 24/03/2014
20 - Annexes

20.1 - Peer review

This certification file does not require peer review.
20.2 - Stakeholders consultation

<table>
<thead>
<tr>
<th>Date</th>
<th>Comments ref.</th>
<th>Comments received</th>
<th>FSC indicator/criterion</th>
<th>Answer client</th>
<th>Answer Lead Auditor</th>
<th>Answer Bureau Veritas Certification</th>
</tr>
</thead>
<tbody>
<tr>
<td>17/12/2011</td>
<td>1</td>
<td>Sir, Following your mail dated 29 November on the subject: Stakeholders Consultation for CBB forest management FSC certification, I wish to inform you that I have no observations. Yours Sincerely</td>
<td>None</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>30/12/2011</td>
<td>2</td>
<td>Sir, In response to your mail referenced above concerning the on-going FSC certification, I would like to make the following observations: Firstly, I think it is worth recalling Section L 420-1 of the Environment Code which stipulates that: “the sustainable management of fauna and its habitats shall be of general interest. The practice of hunting, an activity of environmental, cultural, social and economic interest, shall be part of such management and contribute to a balance between game and human activities, while ensuring sustainable agricultural, forestry and hunting activities”. As such, hunting is therefore a requirement for the regulation of certain species such as cervids. However, in some cases, it is difficult to practice hunting because some owners refuse to</td>
<td>None</td>
<td></td>
<td></td>
<td>Mr. Sauvage, FSC forest management certification considers fauna-related aspects under Principles 6, 7 and 9, as concerns the monitoring of environmental impacts, forest management and the preservation of high conservation values. CBB will ensure that impacts are reduced to minimum and will foster the environmental component in respect of FSC standards and its commitment to responsible forest management. The owners concerned with the certification process are free to cede their hunting rights within the limits provided for by law. However, there is no incompatibility between the practice of hunting, French regulation and FSC certification. Hunting is a recognized management tool, particularly for cervid populations as you rightly pointed out in your mail. We thank you for your interest in the CBB certification process and wish you good season (31/01/2012).</td>
</tr>
</tbody>
</table>
### Comments received

Transfer their hunting rights to local hunting structures. It is also worth considering that the presence of big game in some areas is an environmental component and should be addressed accordingly in the definition of silvicultural practices (choice of species, forestry sites, maintenance, conservation...). I believe it is indispensable to sensitize owners on these two issues.