Public Summary Report for Forest Management
2013 Annual audit
Report for:

Corporation de gestion de la certification forestière des territoires publics du BSL
in
Sainte-Hélène, Québec
Canada

Report Finalized: March 10, 2014
Audit Dates: December 3-5, 2013
Audit Team: Ugo Lapointe
            Mylène Raimbault

Certificate code(s): SW-FM/COC-005447
Certificate issued: May 4, 2011

Organization Contact: Normand Simard
Address: 318, route 230 Est
          Sainte-Hélène, Québec
          G0L 3J0

The only official version of this report is the French version. The report below is a translation of the French.

NOTE: More detailed public summary available in French at http://info.fsc.org/
1. AUDIT PROCESS

1.1. Auditors and qualifications

<table>
<thead>
<tr>
<th>Auditor Name</th>
<th>Mylène Raimbault</th>
<th>Auditor role</th>
<th>Lead Auditor and forest, socio-economic and indigenous aspects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Qualifications:</td>
<td>Forest engineer accumulating nearly 10 years of experience in integrated resources management, in planning and in forest and environmental certification. Mylène was initially responsible for the project in Integrated Resources Management for a structured territory, then worked for a forestry company for over 5 years as coordinator of certification activities and relations with the public and First Nations. In this position, she was among others responsible for maintaining the environmental management system of the company and participated in the development of the general, five-year and annual forest management plans. As forest engineer for the Ministère des Ressources naturelles from 2010 to 2012, she coordinated the consultation activities to be carried out with Aboriginal communities as well as the development activities integrated tactical and operational forest management plans to be implemented under the new forest regime in Québec. Mylène joined Rainforest Alliance in 2012 as a specialist in forest certification in Quebec and completed the FSC lead auditor training.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Auditor Name</td>
<td>Ugo Lapointe</td>
<td>Auditor role</td>
<td>Environmental aspects</td>
</tr>
<tr>
<td>Qualifications:</td>
<td>Ugo joined the Rainforest Alliance team in 2011. Until December 2013, he held the position of coordinator of FSC certification in Quebec before working with the Rainforest Alliance as a consultant. He had previously worked 4 years overseeing the collection and data analysis and writing reports and articles within the framework of research projects carried out in the boreal forests in Quebec. Holder of a Master’s degree in forest ecology on the impact of forest management on wildlife in the boreal forest, Ugo completed the Rainforest Alliance FSC auditor training for the forest management and for the Chain of Custody as well as the Lead auditor ISO 14001 training.</td>
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</tr>
</tbody>
</table>

1.2. Overview of sites visited

<table>
<thead>
<tr>
<th>Type of site</th>
<th>#</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Head office</td>
<td></td>
</tr>
<tr>
<td>☐ Forest districts</td>
<td></td>
</tr>
<tr>
<td>☑ Forest sites</td>
<td>12-53; 11-52; 12-51</td>
</tr>
<tr>
<td>☐ Other sites:</td>
<td>identify type as well as #</td>
</tr>
</tbody>
</table>
2. AUDIT FINDINGS AND RESULTS

2.1. Changes in the forest management of the Forest Management Enterprise (FME) and/or standard and stakeholder issues

<table>
<thead>
<tr>
<th>√</th>
<th>Issue</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>Changes in the forest management of the FME have occurred since the last audit</td>
<td>The new forest regime came into force on April 1, 2013. The roles and responsibilities were modified in March 2013 between the MRN and the forest certification applicants. The ultimate responsibility of the certificate rests with the applicant. The assessment of compliance with the standard is made based on the evidence collected in the field and those submitted by the applicant and its partners.</td>
</tr>
<tr>
<td>☐</td>
<td>Changes in the forest management standard used for audit have occurred since the last audit</td>
<td></td>
</tr>
<tr>
<td>☑</td>
<td>Stakeholder comments on the forest management of the FME were received</td>
<td>Comment summary and RA response: See below</td>
</tr>
</tbody>
</table>

Stakeholder Comments:
Stakeholders are worried about the public release and the notice sent to the MRN by a member of the CGCBSL group certificate asking the suspension of the protected areas’ identification process coordinated by the CRE as long as the conclusions and recommendations of the experimental project of versatile protected areas in the Quebec wildlife reserves (parallel approach to the CRE) are not known.

They also expressed that, in general, the level of commitment (speech and attitudes in meetings) was not uniform among the members of the corporation.

Rainforest Alliance Response:
The Corporation de gestion de la certification des territoires publics du Bas-Saint-Laurent (CGCBSL) clarified in writing that the statements made by this member as to protected areas only committed itself and that the Corporation dissociated itself. The auditors found that this dissociation was seen favorably by one of the organizations most involved in the process. The identification process of protected areas always follows the course and the Corporation is an active player. The auditors also found that all members of the Corporation signed an agreement with the latter, highlighting their duties and obligations in connection with the FSC certificate. The applicant has demonstrated its long-term commitment to adhere to the FSC Principles and Criteria, it meets the requirements of the criterion 1.6 of the standard.

Stakeholder Comments:
One interested party was concerned about the increase in oil exploration and of the creation of mines and of wind farms on publicly owned lands in the Bas-Saint-Laurent.

Rainforest Alliance Response:
The FSC standard covers the forest management of forests. However, the presence of operators of other resources that disturb the forest may have implications particularly in the maintenance of HCVF, endangered species and indigenous resources and the potential impacts are included in the audit activities. In previous audits, the auditors have audited the impact of certain wind projects on compliance with the standard. Note that the areas affected by these activities can also be optionally excluded from the scope of the certificate under certain conditions (see https://ic.fsc.org/fsc-pol-20-003-policy-on-
excision.441-3.htm). In the event, the procedures involve among other things that this also be documented in the audits. At the moment, there are no such requests. The implications of possible new natural resource projects that disturb the forest will be evaluated in future audits, but for the moment no deviation is identified.

**Stakeholder Comments:**
Stakeholders from various backgrounds have indicated their satisfaction with the significant advances made by the integrated resource and land management tables (GIRT) thanks to the high effort level of participations including the BGA (timber supply guarantees).

**Rainforest Alliance Response:**
No response required.

**Stakeholder Comments:**
One interested party stated that she was so far satisfied with the balance between the stakeholders of the GIRT tables but expressed concern with changes in the financing structure for the participation in GIRT tables. The new structure may limit the funding of certain parties and reduce their ability to participate.

**Rainforest Alliance Response:**
Until the auditors found that significant work has been done by the GIRT tables and all parties interviewed testified that they saw progress, especially at the level of the operating schedule and implementation of integrated resource management (GIR) operational tables to conduct fine harmonization in harvest sites. Changes in funding and reducing the frequency of meetings may indeed have implications for the participation of stakeholders and the public. However, during this audit the applicant remains consistent. Since criterion 4.4 dealing with this aspect is evaluated annually, the evolution of this issue can be monitored during the next audit.

**Stakeholder Comments:**
One interested party indicated that since the land is FSC certified instead of CSA, stakeholders have less information on the state of the forest and forest management activities on the territory.

**Rainforest Alliance Response:**
The CSA standard enables the participation of the local public to identify the level of performance achieved by the applicant. The FSC standard for its part involves upstream public participation in the development of the standard, which becomes the same for all applicants. It is not surprising that the stakeholders accustomed to participate in briefings related to CSA certification feel less stressed. Note that the process of certification to the FSC standard of CGCBSL was initiated in 2010-2011, along with the transition to the new forest regime. This period of major changes in the roles and responsibilities of the applicant vs the government brought its share of uncertainties and it has probably had an impact on the availability and quality of information that parties could communicate. During the audit, the auditors nevertheless found a good level of satisfaction on the part of stakeholders in relation to engagement activities that have been conducted so far. No non-conformance on public participation was found.

**Stakeholder Comments:**
One interested party indicated that the implementation of follow-up after cut in the ravages of white-tail deer was inadequate.

**Rainforest Alliance Response:**
This comment was received following the audit. Thus, the follow-up note 04/13 is issued to verify this information at the next audit in 2014.

**Stakeholder Comments:**
Several stakeholders and actors in the territory of the management unit 012-52 voiced their concerns and dissatisfaction with an issue that was being discussed among others when it comes to the Commission régionale sur les ressources naturelles et le territoire (CRRNT) at the time of audit. This file discusses the possible merger of management units (MU) and the respect of the historical territories of the various
timber supply guarantees (BGA). These stakeholders complained inter alia that decisions in this regard had been taken without being able to give their opinion, so by the time of the audit, several resolutions were presented to auditors, resolutions expressing the followings concerns:

- Respect of the historical link with the territory
- Well-established relationships between users
- Understanding that there will be deterioration of relations and the status of the territory

Some stakeholders have pointed out that these are similar to concerns expressed during the 2002 consultations on the possible merger of common areas in the designation of MU. These concerns have also been a consensus to the concerned TGIRT, which resulted in the adoption of form #5, “Territory of warranty timber supply and maintenance of historical connection with supply territories”.

Rainforest Alliance Response:
Since the applicant is only indirectly involved in this case, it was difficult for auditors to assess its scope in relation to the applicant's compliance with the standard. However, the following findings were established through interviews with key stakeholders involved in connection with the consideration of community concerns (4.4.1).
The auditors found that indeed, a decision of the directorate regional branches (DGR) of the MRN was made to recommend the merger of MUs to provincial authorities echoing provincial direction to limit the number of FMUs for the purpose of administrative simplification. Should there truly be such a merger process with BSL, auditors had from the MRN of the BSL as well as from the MRN of another region, the confirmation that there will be public consultations in good and due form, as was the case in 2002 when the FMUs were established to replace the common areas.

The DGR held a meeting with the wildlife Table in December, where it said that if mergers were to take place, it would not be effective until 2018 and by that time, the intention were rather to consolidate the MU level between other harvesting agreements, as this was also the case when creating TRGIRTs (3 tables covering each 2 MU).

For these stakeholders, the distinction between aggregation and fusion remains unclear. However, there is an operating agreement project that helps clarify things. Indeed, always in connection with the search for administrative simplification, the applicant was to develop an "OPERATING AGREEMENT" between the Corporation and the MRN on harvesting agreements for the 2014-2018 period. The examination of the preliminary version of this Agreement under development allowed auditors to find that, although it supervises the signing of two harvest agreements for BSL (one by management unit (MU) via grouping, and not fusion, of MU), more elements referred to in this agreement have clarified the roles and responsibilities of each party and their scope and, with the objective to maintain the historical supply connection of the BGA with their MU, in accordance with the provisions in the MRN/CIFQ agreement. In addition, this objective of maintaining the historical connection is realized by the fact that this grouping is done in the maintenance and respect of the current limits of the six (6) MU, a single management agent remains assigned to each of them and that they are responsible for developing annual plans (PRAN) and harmonize with stakeholders across each MU.
Thus, auditors find that by these foundations to maintaining a historical link with the territory, the possible implementation of this agreement would address the concerns raised by stakeholders interviewed. Moreover, the draft agreement provides that the concerns emanating from the TGIRTs, which ensures compliance with form #5 and is in line with criterion 4.4.
Since the agreement was not signed at the completion of the report, note 01/13 is issued to track the progress of this issue. The implementation of such operating agreement reduces the risk that the applicant is in a situation of non-conformance with criterion 2.3.

Stakeholder Comments:
Several stakeholders noted that, despite their level of overall satisfaction regarding their involvement in the various steps of planning, it nevertheless remained that there are still problems:

- At the level of consultations on changes in cut or road networks, which are still regularly done “at the last minute”;
- A certain lack of monitoring or late returns as to applications (e.g. rehabilitation of roads, various
commitments)

Rainforest Alliance Response:
A review of monitoring records for requests and complaints from members sampled during this audit did not allow auditors to find breaches in the standard. The interview with the GIR coordinator did not reveal any issues concerning the non-respect of harmonization measures or disagreements requiring the engagement process of dispute resolution. That said, the auditors find that there are several general contractors on the territory, whose roles and responsibilities have evolved and are specified as and when the implementation of the new forest regime in 2013, which may in part explain some inconsistencies in the monitoring records. However, it was found that the various stakeholders in the territory have been actively involved in efforts to ensure a smooth transition of files and several steps in this direction have been implemented:

- Operational GIR tables, animated by the GIR coordinator of the CRE have been put in place to ensure the fine harmonization of harvest sites of 2013 and + where all affected stakeholders, MRN and industry representatives are expected to participate in the identification of possible harmonization measures.
- A first meeting of the operational table took place in November and had to verify that the major stakeholders in the industry and the MRN have a common reading of the MRN-CIFQ agreement.
- A regional agreement between the corporation and the MRN was also being developed at the time of the audit to further clarify roles and responsibilities, allowing inter alia to strengthen the monitoring of forestry activities in the territory. See follow-up note 01/13 previously issued.

2.2. Conformance with applicable corrective actions

The section below describes the activities of the certificate holder to address each applicable corrective action issued during previous evaluations.

<table>
<thead>
<tr>
<th>NCR #</th>
<th>Classification of NC</th>
<th>Major</th>
<th>Minor X</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/12</td>
<td>Rainforest Alliance locally adapted standard for evaluation of forest management in the Great Lakes St-Lawrence region – August 2010, Indicator 4.4.1</td>
<td></td>
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</tr>
</tbody>
</table>

**Requirement:**
4.4.1 Local communities, organizations, NGOs, forest workers and the public affected by forest management have opportunities to take part in planning of forest management. The manager demonstrates that comments were considered and followed up on.

**Finding:**
Some wildlife managers feel powerless when it comes to harmonization of forest companies’ needs with their own. In the Matane reserve, many exchanges between the manager and Groupe Lebel have taken place without resulting in agreements before forest operations. Occasionally, no time was allowed for conversation with the manager following meetings which resulted in various interpretations of the discussions. This all results in many differences and poor integration of concerns in forest activities and disrespect of other users (e.g.: Sectors Vivier, John, Rivière Ouellette, Lac Bonafeule).

**Evidence:**
- Interviews with staff  
- Documentary evidence

**Corrective action request:**
Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.  
Note: Effective corrective actions focus on addressing the specific
occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

### Timeline for conformance:
By the next annual audit

### Evidence provided by organization:
- Documents relating to the work of TGIR
- Interviews with the applicant, the MNR and the facilitator of TGIRT
- Interview with stakeholders

### Finding after reviewing evidence:
Auditors find that there are several general contractors in the area, whose roles and responsibilities have evolved and have specified as and when setting up the new forest regime. Several actions have been implemented to ensure a smooth transition and to promote consideration of the community’s concerns despite the transitional period:
- A first meeting of the operational table took place in November and had to verify that the major stakeholders in the industry and the MRN have a common reading of the MRN-CIFQ agreement. A regional agreement between the corporation and the MRN was under development at the time of the audit to further clarify the roles and responsibilities of various parties, particularly in connection with activities in the development of annual plans (PRAN) and alignment thereof.
- Operational GIR tables, animated by the GIR coordinator of the CRE have been put in place to ensure the fine harmonization of harvest sites of 2013 and + where all affected stakeholders, the MRN and industry representatives are expected to participate in the identification of possible harmonization measures.
- Significant improvements have been made as to the involvement of people in the community in determining harvest schedules.
- Work was in progress focused on forest roads, whose condition, maintenance and cost sharing remain common concerns to several stakeholders met.
- Several sheets making consensus within the TGIRT were adopted and included in the PAFI-T. They were still under development at the time of the audit.
- Other opportunities for participation were provided to stakeholders, including the identification of AIPL (areas of intensification of timber production), external reviews of the calculation of the forest, process of identifying protected areas, etc.

Considering these facts and the overall degree of satisfaction shown by the various stakeholders, this non-conformance is closed.

### NCR Status:
CLOSED

### Comments (optional):
NCR #
02/12
Classification of NC :
Major
Minor X
Standard & indicator:
Rainforest Alliance locally adapted standard for evaluation of forest management in the Great Lakes St-Lawrence region – August 2010, Indicator 6.3.3
Report section:
Section 2.5

### NC description and associated evidence:

**Requirement:**
Quantity objectives for species for which their habitat needs have not been addressed by indicator 6.3.1 should be defined with the help of specialists. The plans were developed and implemented in natural forests in order to achieve the objectives.

**Finding:**
An interview with MRN staff indicates that two bat hibernating areas are present on the certified territory.
One of them is within the harvested territory but does not benefit from protection measures.

Evidence:
- Interviews

Corrective action request: Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

Timeline for conformance: By the next annual audit

Evidence provided by organization:
- Interviews with MRN and MDDEFP personnel

Finding after reviewing evidence:
The information provided by the MRN indicate that bat hibernacula listed in managed forest in the MU 12-53 is wedged between a band of 60 m (Salmon River) and slopes of class F. Timber harvesting and road construction are hardly possible and are not foreseen in the next five-year immediate peripheries of bat hibernacula.

NCR Status: CLOSED

Comments (optional):

NCR # 04/12  Classification of NC : Major Minor X
Standard & indicator: STD-40-004 V2
Report section: Appendix V, CoC 3.1

NC description and associated evidence:

Requirement:
CoC 3.1: For material sold with an FSC declaration, the FME must include the following information on sales and shipping documents:
- The FMU certificate code and;
- FSC declaration: FSC 100%

Finding:
Shipping documents have the declaration FSC Pure instead of FSC 100%.

Evidence:
Shipping authorization

Corrective action request: Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

Timeline for conformance: By the next annual audit

Evidence provided by organization:
- Authorizations to transport from the managed forest

Finding after reviewing evidence:
During the audit the auditors were able to check the authorizations to transport (AT) for recent shipments from the certified forest that were produced following the reissuance of the certificate. The AT audited by the auditors included a FSC 100% reference. Thus, the AT meet the requirements and the NCR can be closed.

NCR Status: CLOSED

Comments (optional):
## 2.3. New corrective actions issued as a result of this audit

<table>
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<tr>
<th>MAJOR NCR #</th>
<th>01/13</th>
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<th>Major X</th>
<th>Minor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Report section:</td>
<td>Appendix IV, criterion 4.2</td>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>

### NC description and associated evidence:

#### Requirement:
Workers must comply - otherwise excel- the laws and regulations in the health and safety of employees and their families.

#### Finding:
During the interview with the workers of a forest contractor, it was found that the PPE were not provided, which violates Article 51 of the *Act Respecting Occupational Health and Safety*, which dictates that the employer must take the necessary measures to protect the health and ensure the safety and physical integrity of the worker and thus provide for free all the resources and personal protective equipment required and ensure that they have equipment in good condition and work safely. This same non-conformance was also raised during the audit of 2011 and despite all the outreach performed to close the non-conformance, the non-conformance is repeated. The FSC rules dictate to the non-conformances that are repeated to be automatically elevated to the level of major NC.

#### Evidence:
- Interviews and field observations

#### Corrective action request:
Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

#### Timeline for conformance:
By the next annual audit

#### Evidence provided by organization:
- Contracts with contractors
- Pay stub (an employee of the contractor)
- Interview with the applicant

#### Finding after reviewing evidence:
The applicant was advised upon return listeners the field visit and the situation was corrected a few days after the audit. The auditors have noted that an amount is now included in the payroll contractors fault. Provide amounts from the payroll will now be a requirement included in contractors’ contracts next season, which will address the root cause of this failure to comply with regulations.

<table>
<thead>
<tr>
<th>NCR Status:</th>
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<table>
<thead>
<tr>
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<th>Classification of NC :</th>
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<th>Minor X</th>
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<tbody>
<tr>
<td>Report section:</td>
<td>Appendix IV, Criterion 8.2</td>
<td></td>
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</tbody>
</table>

### NC description and associated evidence:

#### Requirement:
When the monitoring results indicate that an attribute of specific conservation is most at risk, the manager
reassesses the measures used to maintain or improve this attribute and modify management measures to reverse this trend.

**Finding:**
The applicant has not demonstrated that the results of efficiency monitoring, that is to say monitored to track the status of high conservation values (HCVs), are used to modify management measures of HCVs to reverse the trend when an HCV is at risk.

**Evidence:**
- HCVF report
- HCVF Monitoring Program

<table>
<thead>
<tr>
<th>Corrective action request:</th>
<th>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Timeline for conformance:</strong></td>
<td>By the next annual audit</td>
</tr>
<tr>
<td><strong>Evidence provided by organization:</strong></td>
<td>PENDING</td>
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<tr>
<td><strong>Finding after reviewing evidence:</strong></td>
<td>PENDING</td>
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<td><strong>NCR Status:</strong></td>
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<td><strong>Comments (optional):</strong></td>
<td></td>
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</table>

**NCR #** 03/13  **Classification of NC:** Major Minor X  
**Standard & indicator:** Indicator 8.1 of FSC-STD-30-005 (V1-0) EN standard  
**Report section:** Group Appendix (VII)  
**NC description and associated evidence:**

**Requirement:**
The group entity must implement a monitoring and documented control system that includes at least the following elements:

i. Written description of the monitoring and control system;

ii. Regular monitoring visits (at least Annual) of a sample of members of the group to confirm the continued compliance with all requirements of the applicable Forest Stewardship standard

**Finding:**
The “Group Handbook” v 2012-08-20 provides that an internal audit be performed annually. The certificate was suspended between February and November 2013, no internal audit has been conducted. The last internal audit predates the previous annual audit, or summer 2012. The temporary suspension of a certificate does not relieve the applicant from the obligation to fulfill its commitments, which are among others to comply with the requirements of the standard and its internal procedures, hence the issuance of this present NCR.

**Evidence:**
- Interview with the applicant
- Group Handbook, 2012-08-20 version

<table>
<thead>
<tr>
<th>Corrective action request:</th>
<th>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</th>
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</thead>
<tbody>
<tr>
<td><strong>Timeline for conformance:</strong></td>
<td>By the next annual audit</td>
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</table>
2.4. Audit decision

The table below gives an overview of the NCRs status after the current audit.

<table>
<thead>
<tr>
<th>NCR type</th>
<th>#</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open before current audit</td>
<td>3</td>
</tr>
<tr>
<td>Closed</td>
<td>3</td>
</tr>
<tr>
<td>Upgraded to Major</td>
<td>0</td>
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<tr>
<td>New NCRs</td>
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<tr>
<td>New Major NCRs</td>
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</table>

<table>
<thead>
<tr>
<th>Certification Recommendation</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certification requirement met:</td>
<td>client approved for certificate maintenance:</td>
</tr>
<tr>
<td>Certification requirements not met:</td>
<td>major non-conformances identified that need to be addressed during 3 months after the final report date</td>
</tr>
<tr>
<td>Certification Suspension required:</td>
<td>major non-conformance not addressed.</td>
</tr>
</tbody>
</table>

Issues identified as controversial or hard to evaluate:

In spring 2013, the group developed new procedures for retention in cutting with protection of regeneration and soils (CPRS). During the field visits the auditors found that the implementation of this procedure keeps a representative retention of initial settlement and in sufficient quantity to meet the requirements of the standard.

Under the new forest regime, some of the bed cuts are auctioned. The requirements for the first projects sold in autumn 2012 did not include retention. In early 2013, the requirements were changed to include the terms of retention. However, buyers have three years to complete the harvest in areas purchased at the auction. Two sectors purchased in 2012 had still not been cut during the audit. One of the two sectors was under operation during the audit while the other (an area of 8 ha) should be cut later in 2014. The sale of sites being a legal act, it was impossible to require that a retention be maintained. So they gave buyers the choice to leave the retention when they had information to the effect that the fact of not leaving retention could jeopardize the FSC certificates. Many buyers were not members of the FSC certificate and refused to allow retention after cut-over. The total area that will not be subject to retention will be of 8 ha.

This wood has been purchased by companies that are not members of the license and that will not sell the wood with the FSC reference. Since the completion of the audit, the requirements for areas auctioned in the future have been modified to include retention in accordance with the FSC standard. So there is no non-conformance issued since the manager has already made corrective actions.

The possible merger of the UAF:

Several stakeholders in the territory of the MU 012-52 voiced their concerns and dissatisfaction with an issue that was being discussed among others at the CRRNT at the time of audit. This file discusses the
possible merger of management units and the respect of the historical territories of the various timber supply guarantees (BGA). These stakeholders complained inter alia that decisions in this regard had been taken without giving their opinion.

The applicant is only indirectly involved in this issue. It is not yet possible to assess the scope related to the conformity of the territory to the FSC standard. Monitoring note 01/13 was nevertheless issued, refer to sections 2.4 and 2.8 of this report.