FSC CERTIFICATION SYSTEM

RENEWAL AUDIT REPORT

FOREST MANAGEMENT CERTIFICATION

Report finalised on : 03 June 2014

Compagnie des Bois du Gabon (CBG)

Forest(s) situation : Gabon, CFAD of Mandji, Ngounié and Ogooué Maritime Provinces
Manager's address : P.O. Box 603, Route du nouveau port
Town : Port Gentil – Country : Gabon
Contact person : Julien PHILIPPART (julien.philippart@cbgpog.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.certification.bureauveritas.com / fr
Contact person for Africa : Manuel NORROY (manuel.norroy@cm.bureauveritas.com)
Contact person for other countries : Hervé Moinecourt (herve.moinecourt@fr.bureauveritas.com)

Date of renewal audit: from 11 to 19/03/2014
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1 - Description of the prospective forest entity

1.1 - General description and identification

a/ Name of the forest management body and logging company: CBG

Address: route du nouveau port
Postal code: P.O. Box 603
Town: Port Gentil
Country: Gabon
Legal form: PLc
Legal identification code: 791 623 H
Telephone: +0241 01 56 96 43
Fax: /
e-mail: guillaumefenart@cbgpog.com
Website: http://www.cbgpog.com

Workforce: 565, including 400 in forest and 130 at sawmill
Annual turnover: €20,000,000

Chief Executive of the forest management agency: Mr. Guillaume FENART
Contact person (FSC Certification Manager and Custodian of the FSC trademark use): Julien Philippart Director of Forest Resources, Development and Sustainable Management.

b/ Activity

Type of activity: Forest management, logging and wood processing

Activity in detail: The Compagnie des Bois du Gabon (CBG) is a family company established in 1975 for trading in timber and in 1985 it became a logging company.

The company started with a 15,000 ha forest license in the Province of Ogooué Maritime and employed 40 workers. Through hard work and continuous investments over the territory of Gabon, CBG has grown steadily and now has its first processing plant, a sawmill in 1995, and has invested since 2001 in partnership with French industrialist Joubert in a very modern and high capacity Okoume peeling factory known as CPBG (Compagnie des Placages en Bois du Gabon).

CBG currently holds the Mandji CFAD, consisting of the Mandji, Rabi and Kivoro Forest Management Units (FMUs) for a total area of 568,543 ha. The Kivoro FMU is situated between the Loango and the Moukalaba Doudou national parks. It thus constitutes an ecological corridor whose stewardship ensures the continuity of the protection provided by these national parks.

The activity of the company is divided between the head office of Port Gentil, three logging sites (Rabi, Peny and Kivoro). The concession has two base camps where workers and their families live: Peny in the East and Rabi in the West (where you also find the management unit, an infirmary, a garage, the main hydrocarbons storage site, the management of non-biodegradable waste).

In 2007, CBG created the Compagnie de Services et de Logistique Pétrolière (CSLP). The company operates as a provider of services to oil companies holding operating permits in the CFAD in order to carry out works such as the
opening of sites for boreholes, opening of tracks and development and maintenance of benches for the passage of pipelines. Within the framework of this service delivery, the working methods of CSLP are applied in compliance with the procedures and requirements of CBG. CSLP does not have its own staff. Relationship between CSLP and CBG are formalized in a contract that clearly states the terms of the agreement (employment of staff, use of equipment, etc.).

c/ Name of the forest owner:

Forests are a property of the government of Gabon.

Address: Ministry of Forest, Environment and Nature Protection

Town: Libreville

Country: GABON

d/ Description of the legal ownership and usage applicable to forests and territories in the scope of the audit

The forest area of the Mandji CFAD, developed and operated by CBG belongs to the State-owned forest estate. It is divided into 3 FMUs: Mandji, Rabi and since 2008, Kivoro which covers 568,543 ha.

<table>
<thead>
<tr>
<th>FMU</th>
<th>Surface</th>
<th>Date of Approval</th>
<th>Review validated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mandji and Rabi</td>
<td>352,100 ha</td>
<td>09/12/2004</td>
<td>22/10/2009</td>
</tr>
<tr>
<td>Kivoro</td>
<td>216,443 ha</td>
<td>27/02/2009</td>
<td>/</td>
</tr>
</tbody>
</table>
Summary of the legal tenure and use rights (legal and customary) of parties other than the applicant organization:

CBG’s CFAD is a registered state-owned production forest, which forms part of the natural production forest of the State of Gabon’s permanent forest estate. According to the forestry code in force, customary use rights are defined as follows:

Article 252.- the purpose of the exercise of customary use rights is the satisfaction of the personal or collective needs of village communities, which notably concern:
- The use of trees such as building timber and the use of deadwood or branches as firewood;
- The harvesting of secondary forest products, such as barks, latex, mushrooms, medicinal or edible plants, stones and liana;
- The practice of hunting and traditional fishing;
- Grazing in the savannah, in clearings and the use of branches and leaves as fodder;
- The practice of subsistence agriculture;
- Grazing and water use rights.

Article 253.- The exercise of customary use rights is free in the rural forest estate for members of the village communities traditionally living near the estate and subject to compliance with restrictive rules laid down to meet management and protection requirements.

Article 256.- To the exception of the harvesting of deadwood and subject to the specific authorisations provided for by the classification instruments, the exercise of customary use rights shall be regulated in the classified state-owned forests and in registered production forests.

Article 257.- The classification instruments of a forest or the management plan of a production forest must provide for a sufficiently wide area within which the riparian populations can exercise their customary use rights.

Article 258.- The exercise of customary use rights in the area of hunting and wild game shall be limited to the use of the weapons and equipment that feature on the list drawn up by the Ministry responsible for Water Resources and Forestry. The hunting only concerns unprotected animals.

1.2 - Description of the forest stand

Description of the forest (s)

Type of forest: dense moist evergreen forest of the Guinea-Congo region.

List of major timber species, especially those sold, and of other species included in scope of certification (botanical and common name):

<table>
<thead>
<tr>
<th>Groups</th>
<th>Species</th>
</tr>
</thead>
<tbody>
<tr>
<td>“Objective” species</td>
<td>Mahogany, Andoung heitz, Andoung 66, Andoung durand, Andoung microphyllus, Andoung morel, Andoung pellegrin, Andoung towe, Azobé, Bahia, Nauclea Diderrickii, white Afzelia, red Anzem Afzelia pachyloba, Gombe, Igaganga, Kevazingo, Kotibe, Niove, Okan, Okoume, Olon, Oussabel, Ovang kol, Padouk, Sipo</td>
</tr>
</tbody>
</table>
In accordance with Gabonese law (decree 132 of 4 February 2009), some species are no longer harvested over the entire CFAD since 1 January 2009: Afo, Tieghemella, Andok, Biallonella toxasperma and Dacryodes buettneri.

Also, as part of HCVF protection, in the Kivoro FMU, different low-density species were withdrawn from the least of harvestable species during the drafting of the management plan to ensure their sustainability in the FMU.

<table>
<thead>
<tr>
<th>Table of species removed from logging</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aïélé Kongo</td>
</tr>
<tr>
<td>Alumbi</td>
</tr>
<tr>
<td>Anzem noir</td>
</tr>
<tr>
<td>Bodioa</td>
</tr>
<tr>
<td>Bossé clair</td>
</tr>
<tr>
<td>Bossé foncé</td>
</tr>
</tbody>
</table>

Dominant composition of forest stand:
The main forest facies are:
- The secondary forest facies with Okoume (Aucoumea klaineana) and Ozouga (Sacoglottis gabonensis) or with Alep (Desbordesia glaucescens) and with Ozigo (Dacryodes buettneri)
- Dry land primary forests
- Flooded swamp forests and marshes,
- Colonizing forests on the fringes of savannas, mainly made up of Okoumé and light-demanding species
- Savannas, which, at varying degrees, are about to be invaded by a low density shrub community,
- Plantations and regenerative growths around villages.

Location of the forest and audited forest areas:

<table>
<thead>
<tr>
<th>Rabi/Mandji FMU</th>
<th>KIVORO FMU</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location of the forest</td>
<td>between latitude 1°29’ and 2°22’ South</td>
</tr>
<tr>
<td>Latitude E/W</td>
<td>between longitude 9°37’ and 10°56’ East</td>
</tr>
<tr>
<td>Forest area</td>
<td>352,100</td>
</tr>
<tr>
<td>Under private management</td>
<td>352,100</td>
</tr>
<tr>
<td>Under public management</td>
<td>0</td>
</tr>
<tr>
<td>Community</td>
<td>0</td>
</tr>
<tr>
<td>Production forest</td>
<td>335,263</td>
</tr>
<tr>
<td>Classified as plantation</td>
<td>0</td>
</tr>
<tr>
<td>Regenerated by natural regeneration</td>
<td>335,263</td>
</tr>
<tr>
<td>regenerated mainly by natural regeneration or by a combination of natural regeneration and coppice of naturally regenerated trees:</td>
<td>0</td>
</tr>
<tr>
<td>forest area or unprotected area of a commercial logging and managed primarily for conservation objective</td>
<td>16,837</td>
</tr>
</tbody>
</table>
the production non-timber products or provision of services | 0 | 0

Forest classified as being of "High Conservation Value Forest"

* It was excluded from this area of productive forest, the surface corresponding to oil production activities, that is 2,582 ha.

Characteristic of conservation zones

<table>
<thead>
<tr>
<th>FMU</th>
<th>Characteristic</th>
<th>Surface</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rabi/Mandji FMU</td>
<td>complex of submontane forests and savannas covering the Doudou Mountains (original and marginal environments such as forests on shallow soils or rock outcrops with a particularly rich fauna, thanks to the juxtaposition of forest and savannah: Elephant, giant Pangolin, Buffalo, Cobe de fassa, etc.)</td>
<td>16,469 ha</td>
</tr>
<tr>
<td></td>
<td>zone along the river Doughoughou (refuge for the Hippopotamus)</td>
<td>263 ha</td>
</tr>
<tr>
<td></td>
<td>zone along the river Obangué of 50 m wide and 21 km long</td>
<td>105 ha</td>
</tr>
<tr>
<td>Kivoro FMU</td>
<td>The Lake Divangui zone consisting of dry land forests and floodplain forests. Lake Divangui is of major patrimonial importance because of the presence of emblematic reptiles (false gavial) and archaeological sites.</td>
<td>4670 ha</td>
</tr>
<tr>
<td></td>
<td>100m buffer zone on both sides of Rembo Eshira</td>
<td>541 ha</td>
</tr>
<tr>
<td></td>
<td>North-West of the FMU: remote and inaccessible zone between two rivers.</td>
<td>669 ha</td>
</tr>
</tbody>
</table>

List of high conservation values:
A very detailed study was conducted in 2009 and validated by a national panel of social and environmental NGOs, and international scientists as well as a college recognized for their knowledge of the forest ecology of the Gamba Protected Areas Complex;
The report perfectly describes the different types of HCVFs and the main characteristics.

<table>
<thead>
<tr>
<th>HCVF type</th>
<th>Size within the CFAD</th>
</tr>
</thead>
<tbody>
<tr>
<td>HCVF 1</td>
<td></td>
</tr>
<tr>
<td>Sub-type 1.1</td>
<td>Buffer zone of the 2 national parks and the Ramsar zone covers more than 251, 378 ha of the CFAD</td>
</tr>
<tr>
<td>Sub-type 1.2</td>
<td>The entire CFAD (568, 543 ha)</td>
</tr>
<tr>
<td>Sub-type 1.3</td>
<td>The entire CFAD (568, 543 ha)</td>
</tr>
<tr>
<td>Sub-type 1.4</td>
<td>The entire CFAD (568, 543 ha)</td>
</tr>
<tr>
<td>HCVF 2</td>
<td>The entire CFAD (568, 543 ha)</td>
</tr>
<tr>
<td>HCVF 3</td>
<td>Very variable depending on ecosystems: this can range from very small surfaces occupied for example by savannas (6,294 ha) or pioneer forests on the edges of the savannas along the Mandji/Penny highway to some conservation series (the mountain forests of the Doudou mountains in the Rabi FMU cover, with part of the savanna, 16,469 ha). Some forest types that are characteristic of this HCVF type will occupy a large part of the FMUs or even of the CFAD</td>
</tr>
<tr>
<td>HCVF 4</td>
<td></td>
</tr>
</tbody>
</table>
HCVF type | Size within the CFAD
--- | ---
Sub-type 4.1 | Zones with an important role to play in protecting water quality are the ones on the edge of rivers upstream of villages and fishing areas.
Sub-type 4.2 | Zones with an important role to play in protecting the soil against erosion are all forest zones on a steep slope with priority given to zones linked to farming working circles and to villages as well as to the Ndogo lagoon and the forests on very steep slopes in Mayombé.
HCVF 5 | This type was considered the land of the 25 villages of the CFAD, i.e. a total area of 303,817 ha, about 115,000 ha of which are in the CFAD.
HCVF 6 | All the cultural sites identified during the socio-economic study and which have been marked out on the ground prior to logging.

The conservation attributes that characterize these HCVFs are summarized below:

**HCVF 1**

**Landscape**
The Mandji CFAD is part of the buffer zone of the Moukalaba Doudou and Loango National Parks. The buffer zone of the National Parks comprises 80,700 ha of the Mandji CFAD.

Virtually the entire Kivoro FMU is included in the Petit Loango Ramsar site (see map below, Ramsar site demarcated by the purple dotted line). The Ramsar site comprises 192,600 ha of the Mandji CFAD. The buffer zone of the National Parks comprises 80,700 ha of the Mandji CFAD.

**Map locating the RAMSAR zone and National Parks**

At the Kivoro FMU and at the Loango and Moukalaba Doudou, wide zones deemed to be essential to maintaining the ecosystems of the Gamba Complex are undergoing conservation classification. These zones were jointly defined by MINEF, CBG, WWF, WCS, UNESCO, the Smithsonian Institution and biodiversity experts.

A plan to classify it as a Biosphere Reserve is underway.

**Concentration of vulnerable, threatened**
Vulnerable species of the CFAD 17 mammal species, 5 bird species, 2 reptile species (Nile crocodile and false gavial).

19 commercial species present within the CFAD were identified. 3 of them are...
<table>
<thead>
<tr>
<th>Species or species in danger of extinction.</th>
<th>Classified as EN (Tieghemella, Izombé and Pao rosa) by the IUCN. 17 species have serious deficiency with stems of a small diameter in the CFAD (species with an asterisk), indicating that their maintenance in the long term is in jeopardy if appropriate management methods are not adopted. Species that are in jeopardy in the long term and classified by the IUCN include Tieghemella, Afzelias and Moabi. Vulnerable species, both wildlife and plants, are well represented and distributed over the entire CFAD.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concentration of endemic species</td>
<td>The Mandji CFAD is located in the bio-geographical coastal Atlantic region. It is considered as the richest with 207 known mammal species, of which 59 are endemic to Central Africa. 48 mammal species are endemic species. Of those species, there are endemic species such as the Gorilla, Chimpanzee, Leopard, Hippopotamus and forest Elephant. The Mandji CFAD is considered as an exceptional priority site for the conservation of chimpanzees and gorillas. Regarding avifauna, herpetofauna, and piscifluna, the various inventories conducted in the zone highlight the importance of savannas and rivers near the Ndgo lagoon to the endemic species of humid zones. The strongest endemism coincide with mature forests, especially with predominantly Caesalpiniaceae, Burseraceae and Olacaceae stands, characterized by the presence of Caesapiniaceae ballochores. In this sense, within the CFAD, the Rabi massif, bounded to the south by the Kivoro FMU and to the east by the Doudou mountains indicates the highest rate of wood endemism. The cumulative abundance of Caesalpiniaceae, Burseraceae and Olacaceae families accounts for 43% of the number of stems of the 15 most abundant families. The rocky forest and the forest at the bottom of valleys are of high endemism value. These forest types are typically found in the Mayombe massifs and on the banks of all rivers. Finally, forest with a high density of Anthonotha (onzem), Gilbertiodendron, Bikinia and Aphanocalyx (the last two types regroup “andoungs”), have the highest conservation values because they have many endemic species. Concerning woody species, Okoumé, Izombé, and Ozouga are endemic to the coastal zone of Gabon; the three species are well represented over the entire CFAD.</td>
</tr>
<tr>
<td>Concentration of seasonal species</td>
<td>The Akaka marshes and the marshy forests on the edge of the Ndgo lagoon are especially important on account of their flora which provides essential food to elephants during weld time. These broad zones are currently being classified as conservation zones. The savannas in the south-west of Gabon, therefore including the Gamba Complex, as well as the CFAD, are important zones for the hibernation of birds.</td>
</tr>
<tr>
<td>HCVF 2</td>
<td>The CFAD is located in the heart of the Gamba – Mayumba – Conkouati ecological landscape (PFBC, 2006), and ensures the connection between the Loango and the Moukalaba Doudou National Parks.</td>
</tr>
<tr>
<td>HCVF 3</td>
<td>The great plant formations (especially zonal formations) of the CFAD are not especially rare and are well represented in the eco-region or in the landscape. Azonal formations, included in zonal formations, are also well represented in the CFAD. These environments were described in the work of the Smithsonian...</td>
</tr>
</tbody>
</table>
Institution. The National Parks help enormously in maintaining these ecosystems.

The consultation between the scientific and conservation world indicated that salt marshes, cascades, rock chambers, natural talus and monodominant stands with Lecomtedoxa nogo, ozouga (Sacoglottis gabonensis) and Limbali (Gibertiodendron dewevrei) are considered as crucial in the meaning of HCV criterion 3, because they are capable of constituting or being part of fragile ecosystems. These environments were all taken into account in the logging inventories and removed from the list of harvestable areas.

The forest-savanna continuum, which is marked by the ecological barrier that the Mayombe massif constitutes, can be considered as a special ecosystem. It plays a crucial role in the distribution of many animal and plant species.

FHCV 4
Protection of watershed catchment basins
Rivers found in the watershed of rivers on the edge of villages constitute the main source of drinking water for the populations. The forest cover prevents the sedimentation of rivers and flooding of houses. The Rembo Ndogo as well as other watersheds that feed the Ndogo lagoon irrigates zones that are important for fishing and the economy. All watercourses in the concession that feed lagoons, lakes, marshes and riparian forests contribute to the conservation of fragile or rare aquatic ecosystems.

HCVF 5
The lands of villages, mapped in a participatory manner by the CBG’s management unit in 2006, correspond to type 5 HCV.

HCVF 6
Zones of cultural significance (sacred forests, burial grounds, former villages, archaeological zones) were identified during the 2006 survey on village lands. They were located and mapped in a logging inventory together with the local populations.

Source: Study on HCVF, 2009 and FSC Initial Audit Report by Bureau Veritas

List of chemical pesticides used in the forest and the reasons for their use:
No pesticides are used in the scope of certification. Wood is not treated on the timber yard.

List of product categories included in the scope of FM / COC certificate and which are therefore available to be marketed as FSC certified products:
FSC 100% logs meant for sawing and peeling in CPBG and CBG factories in Port Gentil

1.3 - Description of the system and the forest management plan

Management principle
State forests have a management plan defining, in accordance with the conditions laid down by law (Forest Code, Law No. 16/01 of 31 December 2001 and Decree No. 689 of 23 August 2004), the objectives and the management rules, the means to be used so as to achieve the set objectives, as well as the
conditions for the exercise of rights of use by local populations, as prescribed by its classification deed.

The management plan is a document whose main objective is to establish forest exploitation activity on permanent blocks, through a programming in space and time of cuts (and possibly silvicultural activities) aiming at a balanced and sustained harvest to ensure sustainable production of timber, economically bearable for the logging and industrial processing company holder of the forest concession.

Establishment and management objectives
The objectives of the management plan can be viewed at several levels:

**Social and environmental objectives**
- ensure, at the level of the Forest Management Unit, the long-term sustainability of the reconstitution and the availability of the timber resources,
- ensure that the forest ecosystem preserves, after exploitation, a maximum of its ecological functions and biodiversity, through the implementation of low impact logging methods.
- ensure that the harvest of Non Timber Forest Products, where appropriate, does not endanger the ecosystems and resources,
- Protect sites with high conservation value and set aside as a reserve (through the creation of protection and conservation series) a significant surface area that will not be subject to logging throughout the implementation of the management plan.

**Social objectives**
- ensure good working conditions for workers and the well-being of their families, mostly in the base camps.
- contribute to the socio-economic development of the populations living within the scope of the CFAD through employment and support for local development
- strictly respect the rights of use and the customary rights of the local populations

**Industrial goals**
- Development of modern first and second processing factories adapted to the forest's allowable cut, and increasing the level of local processing, increasing allowable cut of second choice wood and developing secondary species. Today, 100% of the production is processed locally since the ban in 2011 on the export of logs.

The management plans and the various yield determinations are based on a management inventory made by the company at a rate of about 0.5% with inventory plots distributed appropriately on all concessions after completion of an initial stratification.

This inventory helps to know or identify
- The harvestable volume (theoretical possibility)
- The densities and the geographical distribution of the resource
- The population structure (age class distribution) and if some species will have difficulties of regeneration (lack of young stands)
• Items relating to wildlife (observation, track ...) are identified especially with regard to the main symbolic species (elephant, gorilla, chimpanzee ...)

From working assumptions such as growth and natural mortality, logging rate and, if necessary, by raising the minimum management diameter (MMD) compared to the minimum cut diameter (MCD) set by the administration, it is therefore possible to calculate the actual allowable cut of managed species taking into account the different requirements for population regeneration.

In accordance with the forest code, cutting cycle durations are above 20 years for each management plan.

Similarly, the Forest Code sets a regeneration rate. It must be
  • Greater than 40% for all Miscellaneous wood species taken separately
  • Greater than 75% for Okoume
  • Greater than 65% for all objective species, taken as a whole

The calculation of the MMD is based on the obligation to respect these regeneration rates but also in terms of population structure (distribution of individuals / diameter classes)

Each FMU is divided into 5 UFGs based on management data. The areas covered by UFG are worked out based on the possibilities of the objective species group. UFGs are obtained such that there can be a constant volume for the species of the group. Each UFG is broken up into 5 AAC of more or less equivalent area, and according to natural boundaries.

AACs are the basic management unit and remain open to logging for 3 years. A logging inventory (100% of the surface) is made. It is on this thorough knowledge of the field (precise location, foot by foot trees to be harvested, mapping of operational constraints such as the drainage network and wetlands, slopes, conservation areas ...) that a low-impact logging is implemented based on an early road programming, an appropriate hauling network and a controlled felling method.

Effectiveness with regard to the forest's history:

The bulk of the forest is made up of Okoume and Ozo on the Rabi and Mandji FMUs and mostly of miscellaneous wood on the Kivoro FMU. The principles of forest management and low impact logging are perfectly mastered by CBG and are effectively implemented. Human and technical resources are consistent and appropriate (number of team, staff training, working conditions, supervision...)

Partnerships with leading international NGOs help in enhancing the mainstreaming and follow-up of biodiversity and improving their incorporation in the management of logging operations.

The villages that are included in the concession or are near it have attracted special attention, resulting in the institution of permanent consultation and their participation in local development.

Forest management follow-up/monitoring procedure

Monitoring is probably one of the strengths of the company.

Post-logging monitoring is extremely detailed and takes into account the whole process, from the logging inventory right to the evacuation of wood out of the
AAC. An analysis of the quality of the work is done by field managers systematically for all workers and every month. This system is indeed behind the calculation of quality premium.

RIL monthly monitoring is carried out on the basis of record whose data is entered on the Acces prog Visual Basic

- Sorting quality control sheet
- Felling quality control sheet
- Hauling / skidding quality control sheet
- Tallying / scaling quality control sheet
- Road quality control sheet

The most comprehensive monitoring of the CFAD relies on the implementation of a "FM_P044 CFAD Monitoring Procedure" which specifies modalities for the control, maintenance and surveillance of forest paths forming boundaries, the monitoring of routes based on a risk assessment (attendance, accessibility, proximity to villages ...). CBG also put in place a network of checkpoints and barriers to monitor the passage or prohibit certain zones (oil activity zone for example). This procedure also describes the observation and treatment of an offence. A monitoring record is available.

CBG also has via PROLAB a partnership with WWF, the administration and park rangers (PROLAB program) to control hunting and poaching.

On a yearly basis, CBG conducts “internal audits” of the environmental management system (RIL, waste management, traceability, etc.), to ascertain that procedures are rigorously applied.

Management structure put in place

CBG has a management unit, headed by a Director of Forest Resources, Development and Sustainable Management. This Unit has the human and technical resources (MIS mapping) for inventories, for the implementation of the social program, the production of management documents (MP, AOP, document on the closing of AACs...), all post-harvest control operations and the opening, maintenance and surveillance of boundaries. The Unit works in close partnership with the Consulting firm, TEREA.

The Management Unit is in charge of certification

1.4 - Harvesting and production

The logging of the stands of the Rabi-Mandji forest massif started since 1950. The initial logging operation was basically carried out along the tracks without special planning, mainly in the western part because of its limited natural constraints and the fact that it is easy to get there through the river and the lagoon.

In 1990, CBG’s production stood at 30,000 m³. It increased regularly right up to 105,000 m³ in 1997. Since 2000, its production ranges between 80,000 m³ and 100,000 m³ (depending on markets and the economic situation), distributed between Okoume (50 %) and miscellaneous wood (50 %).

The harvesting of ozigo, douka and moabi stopped right upon issuance of Decree No.137 of 2009. To compensate for this loss, CBG increased its harvest
of Okoume and upgraded several secondary species for which it was able to find markets (ghéombi, gombé, bilinga…)

The 2008 crisis resulted in significant difficulties and irregularity in marketed volumes.

The logging is concentrated in AACs with a lifetime of 3 years (see map below). In 2013, 13,396 trees were felled representing a marketed volume of 84,000 m$^3$.

Data from the management inventory show that the theoretical allowable cut, that is to say, the available gross volume, varies vary between 28 and 69 m$^3$/ha.
m³/ha for the Rabi and Mandji FMUs, and from 12 m³/ha to 17 m³/ha for that of Kivoro.

Average commercial allowable cuts per species group are also variable depending on the FMU.

<table>
<thead>
<tr>
<th>FMU</th>
<th>Groups 1a et 1b (m³/year)</th>
<th>Groups 2 and 3 (m³/year)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mandji</td>
<td>51,897</td>
<td>38,365</td>
<td>90,262</td>
</tr>
<tr>
<td>Rabi</td>
<td>58,476</td>
<td>32,518</td>
<td>90,994</td>
</tr>
<tr>
<td>Kivoro</td>
<td>55,000</td>
<td>13,816</td>
<td>68,816</td>
</tr>
</tbody>
</table>

**Annual theoretical allowable cut**

The total annual allowable cut is 250,000 m³ compared to the actual harvest which is about 80,000 to 100,000 m³. This difference is obviously due to lack of market for some managed species, non-respect for quality criteria relatively drastic at the time of felling, non-respect for RIL rules, the existence of operational constraints and existence of non-harvestable areas (marsh and buffer zone along the stream...).

The harvesting rate of CBG is between 12 and 15 m³/ha, which corresponds to a rather low range compared to average harvests in Central Africa estimated at 5 m³/ha to 30 m³/ha (source: FAO, 2003).

<table>
<thead>
<tr>
<th>Species</th>
<th>Nature of the product</th>
<th>Produced quantity</th>
<th>Type of sale</th>
<th>FSC type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objective species and secondary species (see list)</td>
<td>logs</td>
<td>m³</td>
<td>In sawmill timber yard or peeling factory in Port Gentil</td>
<td>pure</td>
</tr>
</tbody>
</table>

**Estimated annual biological production:** Not relevant in natural tropical forest.

**Estimated volume to be harvested annually (annual allowable cut - CAA / AAC):** Between 80,000 and 100,000 m³

**Estimated annual harvesting rate (AAC / total volume available):** the rate is variable depending on the species and qualities. It also varies depending on the timber market. The harvesting rate is between 30 and 50 %.

**Estimated annual commercial production for non-timber forest products integrated into the scope of the audit, by product type : NIL**

### 1.5 - Type of certification application

Type of certificate: several UGFs constituting 1 single Forest Concession under Sustainable Management (CFAD)

- Normal certification

Total number of UGFs integrated in the scope of the certificate: 1 CFAD composed of 3 FMUs

Total number of UGFs and forest area integrated in the scope of the certificate that are:

- less than 100 ha : 0 UGF representing 000 ha;
- from 100 to 1,000 ha: 0 UGF representing 000 ha;
between 1000 and 10,000 ha : 0 UGF representing 000 ha;
more than 10,000 ha : 3 UGF covering 568,543 ha.
meeting SLIMF eligibility requirements : 0 UGF covering 000 ha.

2 - Legal and administrative background

Forest and environmental context
The forest law in Gabon was revised in 2001 with the new law that made the implementation of management plans compulsory. This was a decisive step towards a sustainable management of forest resources. The 1994 Labour Code was revised in 2000. In recent years, several implementing instruments have allowed to strengthen the legislative corpus with regard to labour in Gabon. With regard to environmental issues, implementation decrees of the 1993 law are recent and draw inspiration from European regulations.

International conventions and agreements on sustainable forest management of which the Republic of Gabon is signatory (non exhaustive list):

- RAMSAR Convention of 2 February 1971 on wetlands of international importance
- Convention for the Protection of the World Cultural and Natural Heritage (adopted by the UN in Paris on 16 November 1972)
- Framework Convention on Climate Change and on biodiversity defined in 1992 during the United Nations Conference on environment and development (known as Rio Declaration or Earth Summit Convention);
- Kyoto Protocol on CO₂ emissions
- Vienna Convention for the Protection of the Ozone Layer.
- Stockholm Convention on persistent organic pollutants, 2001

Sub-regional conventions and agreements:

- Lusaka Agreement on Cooperative Enforcement Operations Directed at Illegal Trade
National legal and administrative requirements (non exhaustive list):

- Forest Code, law No. 16/01 of 31 December 2001;
- Environment Code (law 16/93 of 26 August 1993 and its implementation decrees:
  - Decree 539/PR/MEFEPEPN of 15/07/05 to regulate environmental impact assessments.
  - Decree 541/PR/MEFEPEPN of 15/07/05 to regulate waste disposal.
  - Decree 542/PR/MEFEPN of 15/07/05 to regulate the discharge of certain products in surface, underground and sea waters.
  - Decree 543/PR/MEFEPN of 15/07/05 to define the legal framework for classified facilities.
  - Decree 545/PR/MEFEPN of 15/07/05 regulating the recovery of used oils.
- Decree No. 689 of 23 August 2004 to define technical standards for the development and sustainable management of registered production state forests
- Order No. 117 of 1 March 2004 to determine the administrative exploitability minima diameters of timber
- Order No. 118 of 1 March 2004 on the regulation of forestry, mining, agricultural, aquacultural, cynegetic and tourist activities within a buffer zone;
- Order No. 119 of 1 March 2004 to lay down the composition of exploitable species groups
- Decree No. 1206 of 30 August 1993 to lay down general and special conditions of specifications in terms of logging
- Decree No. 137 of 4 February 2009 to prohibit the logging of Afo, Andok, Douka, Moabi and Ozigo species.
- Decree No. 164 of 19 January 2011 to regulate the classification and slaughter latitudes of animal species.

Legislative and/or regulatory references pending adoption

- Decree to lay down the conditions of transfer of forest license for grouping or constitution of CFADs (in application of sections 147, 155 and 297 of the Forest Code)
- Decree to lay down the conditions for the acquisition of professional authorisations for logging and wood processing section 102 of the Forest Code)
- Decree to lay down the conditions for the execution of works for the restoration and rehabilitation of degraded sites;
- Decree to regulate the exploitation, processing and marketing of forest products other than timber;
- Decree to lay down the conditions of creation of wild animal species farming units;

Normative documents pending adoption
• NTG: National Technical Guide for the development and management of registered productive state-owned forests. (Provisional version of 30/05/2004).
• Documents of the training workshop on the monitoring and evaluation methods for the implementation of forest management plans (25 to 28 May 2004 in LASTOURVILLE). Working document. Detailed description of the legal requirements for forest management, logging, etc.

2.1.1 - Social context and workers rights (non exhaustive list):
• ILO Conventions (International Labour Office), some fifty different conventions of which the list is available on request
• Collective agreement of the logging industry of the Republic of Gabon (19 February 1986)
• Collective Labour Agreement of the wood, lumber and veneering industries of Gabon.
• Decree No. 1494 of 29/12/2011 to regulate the general rules on hygiene and safety measures at the work place
• Decree No. 692 of 24 August 2004 to lay down conditions for the exercise of customary rights of use with regard to forest, wildlife, hunting and fishing;
• Order No. 1197/MTACT/SG/DGSR of 19 October 2007 to make compulsory the equipment of extinguishers in motor vehicles in the Republic of Gabon.
• Order No. 1327/MTACT/SG/DGSR of 3 November 2007 to make compulsory the equipment of an emergency medical kit in motor vehicles in the Republic of Gabon.
• Order No. 147/MTEFP of 26 April 2001 to regulate the institution of staff representatives.
• Ordinance No. 22/2007 of 21 August 2007 to establish a compulsory health insurance and social security scheme in the Republic of Gabon.
• Ordinance No. 23/2007 of 21 August 2007 to establish a family benefits scheme for underprivileged Gabonese.
• Decree No. 01494 of 29/12/2011 to determine the general rules on hygiene and safety at the work place

3 - Other activities

3.1 - Description of such activities
The Rabi and Mandji FMUs, unlike the Kivoro FMU, are characterized by the presence of many villages that exercise their use and customary rights on the territory: harvesting of NTFPs, subsistence hunting, farming near sites, use of cultural and other sites, etc.
The successive socio-economic studies that were conducted by CBG during the implementation of MPs helped describe activities and their impacts.

**Agricultural activity** Agriculture plays a vital role in feeding and is the main source of income for most village communities. The populations in and around the CFAD practice itinerant slash-and-burn subsistence agriculture while the main cash crops are cassava and plantain. Livestock is an underdeveloped activity in all villages and settlements. It is not used in daily consumption, but for special occasions such as marriages, deaths and diseases.

**Hunting and fishing:** Bushmeat is currently the most important source of animal protein for the entire population in and around the CFAD, especially for the town of Mandji. The most common method of hunting is the use trapping cables or rifle. Hunting pressure within the CFAD is variable depending on the areas and the proximity of villages or towns and of the bushmeat markets of Mandji, Mouila, Lambaréné and even Libreville. Transportation of hunters and firearms in vehicles is prohibited within the CFAD, the hunting lands are usually located in an area of maximum ten kilometers around villages or camps.

The Kivoro FMU is not subject to any hunting activity (quasi-absence of human presence). Agreements between the Ministries concerned, WWF, WCS and CBG operate from the basic principle that no living camp should be set up within the concession and strict checks should be put in place and regular surveillance organized on the territory in order to limit or prevent penetration by hunters to a minimum.

Half of the villages of the CFAD only practice subsistence fishing. Less than a quarter of villages practice a commercial and subsistence fishing.

**Collection of firewood:** The collection of firewood is usually carried out within and around the plantations. It consists essentially of dead wood.

**Harvesting of NTFPs:** Village populations resort to a large number of forest products for medicines, food and handicraft. NTFPs are harvested in the village land, usually by women around the plantations, or by men during hunting. The volumes take into account are anecdotal. As few NTFPs producing trees are harvested for the production of timber, the risk of conflict for this resource is very limited. On 4 February 2009, the moabi, the douka, the ozigo, the afo and the andok were banned from logging by the Ministry in charge of Forests. Therefore, these NTFPs producing species may no longer be in competition with a possible logging.
List of NTFPs in the Mandji CFAD (source: CBG / TEREA Study on HCVF, 2011)

**Oil production** : Within the concession, oil and gas companies Shell, Total, Maurel and Prom, Perenco, and ADDAX have operating licenses covering 45,801 ha (8.05% of the CFAD) located mainly in the Kivoro FMU.
Map locating petroleum development licenses on the Mandji CFAD

Oil-related facilities and infrastructure (roads, pipelines and drilling platforms) used in the exploitation of these reserves cover 742 ha of cleared surfaces, that is 0.13% of the CFAD. These oil routes and equipment are subject to an environmental impact assessment.
A detailed study was conducted by the audit team of BV during the initial audit in 2009. This study presents the situation in detail and all actions taken by CBG. The main findings presented below were again validated by the audit team during the renewal audit and state that:

- The surfaces involved are relatively small.
  - The areas of industrial implantation of oil companies representing 2,582 ha were excluded from development. They are not under the responsibility of CBG.
  - The surfaces corresponding to petroleum activities within the CFAD, that is 246 ha platform and 496 ha clearing for road and pipeline represent 0.13% of the surface.

- CBG has established a partnership with the oil companies through concerted environmental management agreements defining the general principles of the commitments of each of the signatory parties on key issues that are:
  - Exchanges of data and studies
  - Compliance with the regulations
  - Monitoring and Risk prevention
  - Fight against poaching
  - Preventive measures to protect the environment and fight against pollution
  - Protection of HCVFs
  - Improving agriculture and limiting clearing by populations

- This partnership is effective. CBG is involved in the impact assessments of oil companies (consultation, advice via TEREA). The areas are highly monitored by operators. Fences and guard posts are erected at the main entrances to the concession by Shell (which limits penetrations into the concession, thus limiting poaching).

- The oil companies got involved in the implementation of internal measures (ISO 14001 approach) or partnerships with NGOs through support for projects
  - Total Gabon / WWF / WCS Partnership for environmental education and support to the natural park
  - Cooperation between Shell, WWF and the Smithsonian Institution since 2000, which helped increase the knowledge on biodiversity within the Gamba Complex
  - Addax signed a collaboration agreement within the framework of the fight against poaching with the Ministry Water Resources & Forestry in 2008

- CSLP was created by CBG to offer civil engineering services to oil companies in the CFAD for the preparation of technical areas and areas for the installation of pipelines by mastering the techniques, knowing the terrain perfectly and minimizing the negative environmental and social impacts.

- The regulatory framework for the oil industry is complete and strictly implemented and monitored by the Directorate General of Environment (EIA files) with many scoping meetings followed by reporting and
exchanges with the National Parks Authority (ANPN) in case of proximity of the project with Parks;

- There are procedures for restoration after operation that are implemented (e.g.: PERENCO recently planted 30,000 mangrove seedling trees (outside the CFAD) in a mangrove area crossed by a pipeline. Maurel & Prom has a hydro seeding unit for sites revegetation and erosion control.

- Oil companies have first-degree emergency procedures fin case of accident. PERENCO, Shell and Total are also part of GI WACAF which is a global initiative that aims to build the capacity of countries to respond to accidental hydrocarbons spills not only off-shore but also in coastal areas. This international consortium of oil companies enables exchanges on the techniques used.

3.2 - Potential impact on forest management

The impact of hunting is minimized and poaching activity in the concession is controlled through internal checks by CBG on its own vehicles and workers and at the level of barriers and through the many checks by WWF within the framework of the PROLAB (Anti-poaching program) project. Currently, PROLAB shows some loss of momentum and WWF plans to withdraw by the end of the year. Project funding should be provided by the oil companies in 2014 (officially recorded payment of 20 million CFA F). Shell’s fence at the entrance to the CFAD and to the Kivoro FMU helps limit the risks of penetration into the FMU.

All oil companies working in the CFAD have an environmental policy forbidding hunting by their workers.

Other activities (fishing and collection of NTFPs) have no significant impact on the environment due to very low harvesting rates.

Since the beginning of the certification, the company has put in place a procedure for the monitoring of agricultural fronts. After a few years, it is possible to see that the plantations are contained in the agricultural series of the management plans (MPs). Therefore, this activity has relatively little impact.

Petroleum activities with greater impact are located mainly at the level of drilling wells, access roads and involve only a very limited area of CFAD (less than 0.13%). Pipelines are not obstacles to the passage of large and small wildlife that grows particularly well in these areas which are highly controlled and protected from any human penetration.

4 - Bases of the initial assessment

4.1 - Composition of the audit team

Lead auditor: - NP, GREF engineer, forest expert, international consultant, FSC and OLB qualified lead auditor. 10 years experience in forest management auditing (Europe, Asia).

Auditors: - AT, Auditor specialized in forest development and CoC, FSC qualified auditor for Bureau Veritas, 11
years experience and 4 years experience in forest management auditing, salaried worker of Bureau Veritas.
- EN, Independent Consultant, Bureau Veritas Certification Consultant, Agricultural Engineer, specialized in social and environmental aspects. 10 years experience in forest management auditing and chain of custody.

4.2 - Summary of the certification process

CBG was certified FSC-COC FM by Bureau Veritas under No. BV-FM/COC-639590 on 2 June 2009.

4 surveillance audits were conducted by an audit team. On the whole process, 59 non-conformities were dealt with, including 2 major non-conformities in 2010 during SA1.

Further to SA4, some minor non-compliances were raised.

Actions taken to address the non-compliances raised during the previous audit

<table>
<thead>
<tr>
<th>No.</th>
<th>Ind.</th>
<th>Content</th>
<th>Evidence</th>
<th>Status and date</th>
</tr>
</thead>
</table>
| 52  | 6.5.4| The taking into account of sensitive environmental conditions (very steep slope, river banks) is not framed with enough precision in the procedure for the construction of roads and bridges as well as their monitoring. | • Modification of the procedure for road construction, November 2013 version.  
• Clarification of the different types of tracks and specific measures based on the erodibility and the slope.  
• Very positive finding on the field (2013 construction between the Kivoro UFG2 and the RABY UFG3)  
• Building of bridges with riprap, anti-erosion device (rubble mound breakwater), effective management of flows.  
• Technical discussion with JC MBOUMBA, Road construction manager | Closed on 19/03/2014 |
| 53  | 4.2.1| Logging crews do not all have available a whistle per worker to alert in case of accident. | • Findings on the ground of the existence of whistles for all staff  
• Document on the allotment of whistles to fellers seen | Closed on 19/03/2014 |
| 54  | 8.4.3 (8.5.1) | Raw monitoring data are regularly collected according to well-established procedures but their treatment is not formalized to allow a systematic analysis of trends (annual and interannual) and ensure the eventual dissemination of a single document based on external demands. | • 2013 Annual Monitoring Report significantly improved  
• Simplification of some indicators and typology of indicators for annual and monthly or five-year monitoring  
• Taking into account of data from 2011 and systematic discussion on trends and developments | Closed on 19/03/2014 |
<p>| 55  | 2.3.5| Riparian communities were not involved in the development of the procedure for the management of conflicts over land rights and use. They were not involved in its development and did not formally | • A sensitization of local communities was carried out in relation to the explanatory flowchart of the conflict management procedure. | Closed on 19/03/2014 |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
</table>
| 56 | 4.4.4 (4.4.5) | The riparian communities and the local authorities met did not receive copies of the summary of the management plan and are not informed about the logging activities of the company and the potential social impacts.  
- A very plain language summary was made and sent (laminated A3 format)  
- On the occasion of the delivery of such documents, a sensitization was once again carried out (see acknowledgements of receipt of AZENDJE, YENO, NGANDA, PENY, MWILA villages, etc.)  
**Closed on 19/03/2014** |
| 57 | 6.6 1 | Non clearly identified chemicals were identified within the company.  
- Disposal of the products in question  
- Sensitization of operators  
- Gallons are fitted with identification rings (jerrycan noticed at the Dianongo landing pier, writing down of the still store content).  
- No negative finding on the field  
  
The company provided after the audit an updated list of chemicals classified by category (acid, CAT product, lubricant, resin, thinner, cleaner, paint, mechanical ...)  
**Closed on 15/04/2014** |
| 58 | 6.6.5 | The monitoring of settling tanks and separators installed on sites hydrocarbons is not adequate.  
- Issue of a memo on 29/10/2013  
- Appointment of an official to be in charge of the management and maintenance of settling tanks  
- Creation of a data sheet for the different types of settling tanks and separators with diagram and the various checkpoints to be put in place.  
- A plastic sheet is placed on each settling tank and on it the maintenance check is recorded fortnightly.  
- The maintenance officer knows the procedure.  
- The different bins observed meet the standards.  
  
The procedure was not applied on the decantation system at the fuel station of the Bonabri landing pier. The information provided subsequently allowed to close the NC  
- Placement of the sensitization data sheet and the plastic monitoring data sheet  
- Cleaning of the settling tank  
**Closed on 15/04/2014** |
| 59 | 5.3.1 | The impact of logging on the residual stand is not minimized.  
- Issue of a memo dated 29/11/2013 on the treatment of hanging trees  
- Sensitization on this problem during the fellers training conducted by L REPANS in September 2013  
- No negative finding on the field  
**Closed on 19/03/2014** |

Nonconformities 57 and 58 were not closed during the renewal audit for lack of information and evidence. The items were subsequently sent to the Lead auditor who analyzed them. The NCs were therefore closed on 15/04/2014, that is within 10 months, which is in compliance with the procedures of Bureau
Veritas (lifespan of 12 months as from their official presentation, in the case of CBG during the closing meeting of SA4 in June 2013).

<table>
<thead>
<tr>
<th>No.</th>
<th>Ind.</th>
<th>Remarks</th>
<th>Actions taken by the company</th>
</tr>
</thead>
<tbody>
<tr>
<td>AO</td>
<td>4.2.1</td>
<td>The company should ensure that first aid kits are in full permanently in staff trucks.</td>
<td>A rigorous monitoring of first aid kits shall be ensured by the supervisory teams on the field. Additions are made to aid kits after the checks of their content. Kits that were checked on the field during the audit and in particular those of trucks were complete.</td>
</tr>
<tr>
<td>AP</td>
<td>4.1.4</td>
<td>Workers of the Rabi based expressed in the list of grievances and during this audit, the need for the school found there to have a pre-school cycle for the education of their children. The company should conduct a reflection on this complaint.</td>
<td>A study is underway with regard to the project for the construction and management of a pre-school for workers children in Rabi.</td>
</tr>
<tr>
<td>AQ</td>
<td>4.1.7</td>
<td>The social actions of the company are not documented and evaluated in compliance with the requirements of the procedure for social support in favour of local communities (Ref SF.P051 of February 2012, items I.14 and I.16).</td>
<td>To date, all social actions are fully documented and quantified as much as possible by the company. A summary table of social achievements was seen during this audit</td>
</tr>
<tr>
<td>AR</td>
<td>4.2.2</td>
<td>The document entitled “Occupational Health and Safety Committee” Ref HSE_8010-FT1 of February 2012, V1 seen on the Rabi site is outdated.</td>
<td>The “Occupational Health and Safety Committee” document Ref HSE_8010-FT1 of February 2012, V1 has been reviewed and updated</td>
</tr>
<tr>
<td>AS</td>
<td>4.2.1</td>
<td>A system for the monitoring / control of compressors tanks is not established.</td>
<td>On the Peny site, a new compressor was recently purchased and installed, the life data sheet of this compressor is available.</td>
</tr>
<tr>
<td>AT</td>
<td>4.2.6</td>
<td>The article of the Order No. 006/MTEPS of 12 April 2010 concerning the composition and functioning of the Occupational Health and Safety Committee is not systematically applied.</td>
<td>On the Peny site, it was found that the nurse does not participate in meetings of the OHSC as prescribed by Order No. 006/MTEPS of 12 April 2010 concerning the composition and functioning of the Occupational Health and Safety Committee.</td>
</tr>
</tbody>
</table>

### 4.3 - Forest management standard(s) used during the initial audit

During the audits, we made reference to FSC Standard for the certification of forests in the Congo Basin”, FSC-STD-CB-V01-04-EN. This latest version is available on the website of Bureau Veritas Certification www.certification.bureauveritas.fr or on request from Bureau Veritas Certification. Checklists filled in by auditors are available in Appendix C.

### 4.4 - Adaptation of the standard and stakeholder comments

No Adaptation was made as we used the Standard locally adapted by FSC NI.
## 5 - Information collection methods

### 5.1 - Description of the audit program

<table>
<thead>
<tr>
<th>Date</th>
<th>Location</th>
<th>Time</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tuesday, 11 March</td>
<td>Libreville</td>
<td>6:00 pm</td>
<td>Arrival of auditors</td>
</tr>
<tr>
<td>Wednesday, 12 March</td>
<td>Libreville / Libreville Lambaréné</td>
<td>7:00 a.m.</td>
<td>Meeting amongst auditors Stakeholder consultation (WWF, Administration) Departure for Lambaréné</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8:30 a.m.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>2:00 p.m.</td>
<td></td>
</tr>
<tr>
<td>13 March 2014</td>
<td>Lambaréné – Mandji</td>
<td>7:30 a.m.</td>
<td>Departure for Mandji (3 hrs) Opening meeting in the presence of officials from CBG sites and services. Introduction of auditors, objectives of the FSC surveillance audit (review of scopes of certificates), certification procedure, validation of the audit planning with regard to logistic aspects, presentation of companies' developments</td>
</tr>
<tr>
<td></td>
<td></td>
<td>10:30 a.m.</td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>EN 12:00 a.m. Visit of the workshops in Peny Meeting with HRM</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>NP+AT 12:00 a.m. Visit of the Oloumi worksite – logging and post-logging (Rabi FMU) Departure for Rabi</td>
</tr>
<tr>
<td>Friday, 14 March</td>
<td>Mandji / Mandji-Rabi</td>
<td>EN During the day</td>
<td>Meeting with the public authorities and neighboring villages</td>
</tr>
<tr>
<td></td>
<td>/ Rabi</td>
<td></td>
<td>NP+AT During the day Visist of the logging site (Kivoro FMU) Road clearing site Oil zone</td>
</tr>
<tr>
<td>15 March 2014</td>
<td>Rabi</td>
<td>7:00 a.m.</td>
<td>Visit of the workshops, the garage, the waste management on the Rabi site, literature review</td>
</tr>
<tr>
<td></td>
<td></td>
<td>7:00 a.m.</td>
<td>Meeting with staff, literature review Field audit balance sheet Transfer to POG</td>
</tr>
<tr>
<td></td>
<td></td>
<td>11:00 a.m.</td>
<td></td>
</tr>
<tr>
<td>16 March 2014</td>
<td>POG</td>
<td>Team During the day</td>
<td>Working session amongst auditors</td>
</tr>
<tr>
<td>17 March 2014</td>
<td>POG</td>
<td>NP 8:00 a.m.</td>
<td>Literature review Meeting with the administration</td>
</tr>
<tr>
<td></td>
<td></td>
<td>EN+AT 8:00 a.m.</td>
<td>Meeting of CBG Visit of CPBG</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Team 6:00 p.m.</td>
<td>Meeting amongst auditors</td>
</tr>
<tr>
<td>18 March 2014</td>
<td>POG</td>
<td>AT 8:00 a.m.</td>
<td>DDS Evaluation</td>
</tr>
<tr>
<td></td>
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<td>NP EN 8:00 a.m.</td>
<td>Meeting with adm/HR/Finance Literature review</td>
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<td>Team 6:00 pm</td>
<td>Stakeholder consultation R Meeting amongst auditors</td>
</tr>
<tr>
<td>19 March 2014</td>
<td>POG / LBV</td>
<td>Team 8:30 a.m.:</td>
<td>Meeting amongst auditors.</td>
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</tbody>
</table>
5.2 - Total persons/days of the audit

Declaration of the total number of persons/days spent in evaluating the forest entity:
- Pre-evaluation and other preliminary work: 1.5 man.days
- Time spent in reviewing documents, records, interviewing people and stakeholders as well as site visits: 15 man.days
- Time spent in traveling to and from the region where the evaluated forest is located: 4.5 man.days
- Formatting and restitution: 1.5 man.days
- Report: 2.5 man.days
That is a total of 24 man/days.

5.3 - Site visit(s)

In the course of the audit, the following sites have been visited:
- Douengui technical base
- Mouréri and Mandji gate
- Peny camp et technical base
- Rabi camp et technical base
- Rabi offset camp
- Rabi FMU, AAC 8 and AAC9: logging site, roads and hauling paths. Post-logging monitoring
- Kivoro FMU, AAC 5: logging site, roads and hauling paths, traceability.
- Rabi FMU: construction site of the main road and bridges (4) towards lake Onangy
- CBG’s sawmill
- CPBG peeling factory
- Bon Abri landing pier
- Bordering villages of YENO and PETI VILLAGE

5.4 - Literature review

Legality, taxation
- Trade register No. POG 2001 B 59
- Receipt of payment of the first instalment in November 2013, the second instalment on 30 January 2014 and third instalment on 30 April 2014 of corporate tax
- Receipt of payment of quarterly contributions to the NSSF for the fourth quarter of 2013 received on 29/01/14, receipt of 29/01/14 with 14 million as wage share and 118 million as employer's share paid in instalments.
- Receipt of payment of quarterly contributions to the NSSF for the third quarter of 2013 received on 29/10/2013, receipt of 29/10/2013 with 16
million as wage share and 116 million as employer's share paid in instalments.
- Receipt of payment of the personal income tax, TCS and FNH for the month of February submitted on 14 March 2014 with list of the documents.
- Transmission slip of tax return on salaries 13/03/14.
- Check for payment of the tax on salaries of 11/03/2014 cleared on 11/03/14.
- Check of 13/01/14 for the return of property tax on rents counting for the 4th quarter of 2013 received on 13/01/14
- Voucher for the payment of the stumpage fees before boarding of 03/05/2014 and of 25/02/2014.
- Receipt of payment of the tax on income from movable capital, grants and donations (IRCM payable no later than April 30 AN n+1) for the year 2012 paid on 30 April 2013.
- Acknowledgement of receipt of the electronic filing of tax return of 19/12/2013 for the month of November 2013. Acknowledgement of payment, etc... 19 Feb. 2014 for the month of January 2014

Internal Social
- Summary of quantities on order, Peny Staff store 2011 ;
- Summary of quantities on order, Peny Staff store 2012 ;
- Summary of quantities on order, Peny Staff store 2013 ;
- Water analysis: CBG domestic water, sample collected on 15/02/2013 under registration number 13/0913.
- Water analysis: CBG domestic water, sample collected on 21/02/2014 under registration number 14/0847.
- Memo (referenceless) of 10 March 2014 concerning the bacteriological potability and treatment measures in base camps.
- Procedure (HSE P014 of February 2012) to guarantee the potability of water in base camps.
- Incidents and accidents report form
- List of the content of the logging site first aid kit for Production Team 1, 2 and road team
- Summary table of OHSC's meeting of 01/02/2014
- Emergency Factsheet (MEDEVAC Procedure) PENY, January 2014
- Incidents and accidents report form
- List of the content of the logging site first aid kit for Production Team 1, 2 and road team
- Summary table of OHSC's meeting of 01/02/2014
- List of grievances of CBG's forest staff representatives
- Response of the Management to the grievances of staff representatives, 20 December 2013
- Scorecard of Mr. PAMBOU Paul, shovel operator, month of November 2012
- Medecines consumption data sheet
- Prices of medicines in CBG pharmacy (undated)
- Summary table of OHSC's meeting of 01/02/2014
- Order placed by the Peny infirmary, 15 February 2014.
- Report of medical visits for the staff on the Douengui - CBG logging site in Mandji, 7 April 2013.
- CBG Letter (referenceless) of.............. to Mr. MIHINDOU Maurice concerning the support following the periodic health examination.
- CBG mail of 19 November 2013 sent to Mr. MIHINDOU Maurice concerning the medical certificate.
- Report of medical visits for the staff on the Douengui - CBG logging site in Rabi, 7 April 2013.
- CBG training plan and methodological note  I Mvé, Y Petrucci March 2009

External social
- State of things with ongoing projects or pending funding
- External social policy – declaration of intent, HSEP-07 August 2013

Monitoring
- Settling tanks and salvagers control sheet for 2014
- Monitoring annual report for 2013
- Mail form Mr. Jonathan Di Placido, Inventories Manager concerning the risks of penetration of the Mandji FMU - Guidouma Road (28 October 2013)
- Mail form Mr. Jonathan Di Placido, Inventories Manager concerning the last boundary monitoring (19 March 2014)
- Boundary monitoring data sheets of 3 March 2014
- Schedule of boundaries and sensitive areas monitoring for 2014
- Schedule of boundaries and sensitive areas monitoring for 2013
- PROLAB 2013 Annual Monitoring Report
- CBG 2013 Follow-up Annual Report
- Typology and list of CBG's monitoring indicators, Excel base 2014
- CBG's wildlife monitoring data sheet (draft).
- Sorting quality control sheet
- Felling quality control sheet
- Hauling / skidding quality control sheet
- Tallying / scaling quality control sheet
- Road quality control sheet
- Balance Sheet UFG1 2005/2011 MANDJI FMU
- Database of the mechanism for growth monitoring in Kivoro 2013 (Excel base)

Environment
- Non-biodegradable waste registration, sending / receiving form
- Report of the validation meeting on the Environmental Impact Assessment of the KIVORO FMU of 05/05/2009
- Environmental Impact Assessment of the MANDI and RABI FMUs, TEREA 2006
- Environmental and Social Impact Assessment + ESMP of the KIVORO FMU, TEREA V2 September 2009
- Environmental and Social Impact Assessment + ESMP of the MANDJI FMU, TEREA June 2012
- Database of chemical products fact sheet
- Study on HCVFs of the MANDJI CFAD by LAPORTE / VAN POL TEREA V4, May 2011
- Environmental Protection Policy - Statement of intention. HSEP-04 July 2013
- General Procedures Guide for Environmental Assessments of forest sector in GABON (MEF / DGEPN. March 2014 Draft)

Procedures
- GF_P030_FT1_Prepa and construction of water passage
- SF_P054 Procedure for the Wildlife component
- GF_P030_FT3_Management of flows
- GF_P037 Procedure for felling and topping_V3
- GF_P038 Procedure for hauling_V2
- GF_P044 Procedure for the monitoring of the CFAD
- GF_P045 Procedure for Quarries V1
- GF_P045_FT03_Quarry closure Data sheet
- HSE_P015_Procedure for waste management

Management and logging
- AOP AAC No. 10 (2014) UFG2 RABI, MANDJI CFAD
- AOP AAC No. 09 (2013) UFG2 MANDJI, MANDJI CFAD
- CBG Management Plan of the CFAD, KIVORO FMU 2009/2034 VF January 2009
- CBG Management Plan of the CFAD, MANDJI RABI FMU 2005/2029, Revised version 2010, TEREA
- Closure File of Annual Felling Site No. 03 (2010) UFG 1 Kivoro FMU. CBG 2014
- Closure File of Annual Felling Site No. 06 (2010) UFG 2 Mandji FMU. CBG 2014
- Closure File of Annual Felling Site No. 06 (2010) UFG 2 Raby FMU. CBG 2014
- Management Plan of UFG2, KIVORO FMU 2013-2017
- Public summary MP CBG Kivoro
- Résumé Publique PA CBG for RABI/MANDJI FMU
- Presentation / extension sheet (A3 format) of the development
- Operation Map, Pocket KO5-13
- Operation Map, Pocket KO5-04
- National Technical Guide for Forest Management (GTNAF) MEF / PAPPFG
  - May 2013

Traceability
- Control Chain of processed products, Version 06, February 2014
- Mail to validate the use of the mark

5.5 - Interviews of the stakeholders met

Executives and salaried workers of the Company

Head office of the company in Port Gentil

- Mr. Guillaume FENART, Chief Executive Officer
- Mr. Hubert FENART, CBG (Forest) General Manager
- Mr. José Luis BONNIN, Administrative Director of the CFAD
- Mr. Luc HOLTZSCHERER, Administrative and Financial Director
- Mr. Julien PHILIPPART, Director of Forest Resources, Development and Sustainable Management.
- Mr. Paul BOUSSOUGOU, Personnel Manager
- Mr. Vincent DECHAMPS, CBG Sawmill
- Mr Pierre François MERLIN, Deputy GM
- Mr. FENART Remy, Leasing Manager
- Mr. DANG Jean Nestor, Chairman of OHSC, CBG

On-site
- Mr. Jean François GUIBERT, FSC Operations Deputy Director
- Mr. Anthony BRENON, Deputy Operations Director
- Mr. Jean Pierre BOUYER, Maintenance Manager
- Mr. Saouili DARKOUI, Cartographer, Forest Manager and Monitoring and Follow-up Manager of the Rabi workshop
- Mr. Quentin d’OTTREPPE, Deputy operations manager in Peny
- Mr. Jule Cesar OBAGHE NZE, Welfare program Manager
- Mr. Sacko CHIAKA, Head of the heavy vehicles workshop in Rabi
- Mr. NKALA MAKOSSE Armel Ghislain, Welder, Staff representative
- Mr. BISSIELOU Achille Jolly, Bull driver, Staff representative
- Mr. MABIKA Gaël, Mechanic, Staff representative
- Mr. GAMBOU Paul, Shovel operator
- Mr. MABIALA Lucien Martial, Personnel Manager ; Rabi site
- Mr. RETENDE Pierre Marius, Micro Bois Manager
- Mrs. NZANGUILA Matilde, Nurse
- Mr. Nicolas ROY, Maintenance Manager
- Mr. GUIZOMBI Jean De Dieu, Timber truck driver
- Ms. FANNY MOUPIGA, Nurse, Peny site
- Mr. MAPORO Gauthier, Checker, Yeno timber yard
5.6 - Identification and stakeholder consultation

The following stakeholders were consulted in two occasions:

A comprehensive consultation by email that was widely circulated on 17 January 2014. This consultation mainly focused on the issue of downgrading the area where the Kivoro FMU is found and which was formerly a hunting area. Some stakeholders including WCS Gabon and WWF Gabon responded (see Appendix 1)

A second consultation, more focused on actors or parties directly affected by the management of the audited forests, was conducted during the audit. Those consulted are:

**Administration**

- Mrs. Hermance MOURE OKOCHE NANG BEH, Deputy Director General No.1 of Forests DGF MFPRN
- Mr. René MOBOZA, Research Service Head, GD Env MEPNDD
- Mr. ALLOGHO, Research Officer, Industrial Env. Service, MEPNDD
- Mr. Roger AZIZET, Peripheral zone Service Head, ANPN (by phone)
- Mr. BASSIRA Cédric, Water Resources and Forestry Technical Officer, Cantonment of Mandji

**Bordering villages**
- **Yeno village**
  - Mr. GUIMBETY Narcisse, Representative of the Yeno village CFAD and
  - the Chief of Yeno village
- **Petit village**
  - Mrs. KOUMBA Helene, Village chief
  - Mr. Jean Marie NDOUMBA, Notable

**Service providers and suppliers**
- Mr. Thierry JOUBERT, JOUBERT Group
- Mr. CASSAGNEAU, Company doctor, POG
- Mr. Jean François PERION, DPS, naval construction, maintenance of barges
- Mr. Bas VERHAGE, Programme manager WWF Libreville
- Mr. Stephane Le duc Yeno, WWF GIS Data base Manager
- Mrs. KOUKOUDOU Florence, Store manager
- Mr. Joël NDECKSOMBIA, CKDO manager

CBG does not invite subcontractors for its development activities; logging (including mechanical) and transport of wood or monitoring / guarding.

**5.7 - Other evaluation techniques**
No special audit technique was used apart from literature, consultation with stakeholders, field observations and workshops (office and field) with company personnel.

**5.8 - Closing meeting of the initial audit**
The presentation meeting took place in a quiet and constructive atmosphere. The audit team recalled the purpose of the renewal audit. The conduct of the audit has been presented as well as strength and weak points of the company. Each of the minor Non compliances and observations were described and explained.
Findings of the audit were presented and accepted by the company (signature of doc SF02)

**6 - Observations during the audit**

**6.1 - Results of the evaluation with regard to FSC standard requirements**
The new FSC Standard for the Congo Basin used by the audit team was filled in with care and detail and in a comprehensive manner.
The following paragraphs are merely a summary of the result of the evaluation.
6.1.1 - Principle 1 - Compliance with laws and FSC principles

The laws are known by the company and are recorded and available at the administrative and accounting services. CBG has an effective legal monitoring via its network (union of logging operators, technical support of the consultancy firm, TEREA). All the steps for licensing were followed. There is no factual or field finding going against compliance with laws (1.1).

It was checked by the audit team that the company is up-to-date with regard to timber royalty, social and other tax obligations. Documents are available (e.g.: patent, payment receipt to the NSSF, receipt of payment of corporate tax) (1.2).

Conventions on the environment are also available. CITES, FAO, Ramsar, WASHINGTON, Bonn, Vienne, Bâle, Bamako, New York, Kyoto, Rio, Cartagena, Maputo, Yaoundé, and that of the ILO. The list of CITES species in Gabon is known and published on the different forest sites (1.3)

Currently the main conflict between the laws and PCI of FSC is related to the allocation of FMU on a hunting area which is not yet downgraded. The conflict stems from a difference in legal interpretation between NGOs (WWF / WCS) and the public authorities in Gabon (MINEF Legal Counsel, Director of inventories, Development and Regeneration of Forest and Director of Studies and Documentation). According to these NGOs, hunting areas classified must be downgraded before being reassigned to other uses (logging).

According to public authorities in Gabon, the law is above any other legal text, which means that the creation of national parks that led to the constitution of the Kivoro FMU repeals all previous provisions (and therefore invalidates hunting areas).

WCS and the National Parks Authority of Gabon in July 2012 organized a meeting on the pre-zoning of the Gamba Protected Areas complex which led to the validation of the boundaries of the various currently allocated areas. Since 2013, the Ministry of Water Resources and Forestry is embarked on refining the boundaries of the various areas and envisages in its 2014 Annual Work Plan to promulgate the decrees for the downgrading and reclassification of the disputed areas. The resolution of the conflict therefore depends on the administration and in no case on CBG and its partners (1.4)

The Operations Department, and notably the Inventories Service has a team dedicated to the planning of boundary monitoring activities. A tripartite protocol involving the Ministry of Water Resources and Forestry and WWF (PROLAB Protocol) was established. A monitoring procedure was drafted for the Mandji CFAD (Ref. GF – PO44 version 02 of February 2012). Roadways accesses of the CFAD are controlled by specific staff that manages barriers. The company has deployed the necessary means and tools to guard against illegal activities (1.5)

There is a clearly established and public commitment policy of CBG in the FSC certification process (as revised in March 2012 and signed by the CEO, Mr. William FENART available on the website https://www.cbgpog.com) (1.6)

6.1.2 - Principle 2 – Land rights, use rights and responsibilities

Documents on the granting the concession (Provisional Management/Logging/Processing Agreement signed in March 2008 or
Management Plans) establish proof of a right to long-term use. These documents and preliminary socio-economic studies describe and map the different uses. This approach was participatory at the start (participatory mapping of village lands) and recent visits were conducted with villagers to present the summary and very well popularized sheet of the development. An external social policy (HSEP 7 August 2013) was developed and signed by the General Management of the company. This policy is articulated around five objectives, the first is respect for the use, land, customary or legal rights of local communities (2.1)

Gabon’s Forest Code and its implementation instruments clarify forest and wildlife resources access modes. The management plan repeats the legal requirements for access to forest resources. Communities were strongly sensitized and they do identify very well the advantages and disadvantages, mostly cases of use conflicts that might exist around certain resources (2.2)

There is a procedure for conflict management and a simple flowchart of conflict management that was developed and presented to local communities. This procedure favors negotiation and dialogue. The company set up in collaboration with local political and administrative authorities as well as the riparian communities, a framework for consultation in the form of a committee to monitor the social achievements of the company. This committee is supposed to meet twice a year to plan actions to be taken and to evaluate achievements. The frequency of meetings is not always guaranteed and lags in implementation have been observed. No discrepancies or complaints were recorded in relation to this principle (2.3)

6.1.3 - Principle 3 - Indigenous peoples’ rights
NOT APPLICABLE. The absence of indigenous population was documented in a study carried out by external consultants in 2006 on the basis of bibliographic data and consultations as well as experts in the field

6.1.4 - Principle 4 – Community relations and workers’ rights

Riparian communities benefit from employment opportunities, training and other services (4.1) through several mechanisms

- The external social policy (HSEP 7 August 2013 Version 00 - Objective 5) promotes at equal competence priority hiring of local residents and the company welcomes and regularly supervises trainees of Gabonese nationality.
- On the Rabi base, the company has a full flesh primary school for the education of workers' children within the framework of its social program for riparian communities, the company supports school infrastructure in neighboring villages as well as equipment of health facilities.
- The process is in addition to regular taxes paid by CBG and completes development budgets provided for by the State. The amount of support will be determined on the basis of 800 CFAF per m³ of wood harvested from the CFAD in a year. The distribution of this budget is done over 4 beneficiary zones in proportion to the area of each department on the CFAD. The
support takes the form of projects, in no case of cash payment. All selected projects have a total cost of 75 million CFA francs.

Compliance with legal requirements with regard to the health and safety of workers is a constant concern (4.2).

- Preventive measures are implemented by the company to minimize accidents (first aid training and fire safety training for safe working practices - RIL September 2013).
- A risk analysis for each work station was carried out and PPEs were assigned to workers on the basis of this analysis.
- Workers undergo pre-employment medical checks and periodic health examinations.
- The health conditions of the workers and their families comply with the regulations as may confirm the audit report of the special inspector in charge of the forestry sector.
- Within the company, there are occupational health and safety committees operating in compliance with the regulations.
- Spatially distributed teams all have first aid kits and emergency workers are trained to ensure the representativeness within teams.
- Housing conditions of workers meet the requirements of the national legislation. Housing available to workers and families are comfortable. The company is carrying on with its program of construction of new houses. On the Peny site, houses are more than enough.
- All the workers are affiliated to the national social security fund and contributions are paid regularly.
- The company has at the level of the Rabi and Peny forest sites, infirmaries with trained staff. Nurses are supported by doctors from conventional hospitals, mostly for pre-employment and routine annual medical checks.
- The medical evacuation procedure (MEDEVAC) is particularly effective and depends on the means of oil companies (helicopter) The company provides a full support in case of accident involving a worker.

No major violation of the labor code was identified during this audit. An inspection carried out in 2013 by the Special Inspector of Labor for the forest sector showed that the company’s operations meet the requirements of the Gabonese Labor Code. Consultation meetings are regularly held with staff representatives who did not revealed to the audit team the special difficulty with regard to “freedom of assembly, management of complaints and consideration of grievances (4.3)

Consultations are carried out by the social unit within the framework of identification and implementation of social projects through village committees established in the riparian villages (4.4)

Operational procedures are developed for conflict management (including offsets). Within the framework of development projects, the company supports health centers in the area covered by the CFAD (donation of medicines, equipment, etc..). Medical evacuations also cover local communities (4.5)
6.1.5 - Principle 5 – Benefits from the forest

The MP identified opportunities compatible with sustained long-term operation and harvesting is generally well below (e.g.: on UFG1 of the Mandji FMU, 40% of the volume compared to what is allowed). Many measures help ensure the economic viability of the management (MMD > MCD, respect of seeds and crop trees...). Despite the current economic difficulties, CBG continues to invest (construction of a new garage on the Raby site by 2014/2015, good quality and well maintained rolling stock...) (5.1)

CBG values a relatively wide range of species and is of recent developing new markets with species historically less used in Gabon (Andoung, Towe, Okan or Dabema). The collection of non-timber forest products by the population is mainly dedicated to household consumption (subsistence). There is no marketing channel for NTFPs, this due to low demand (5.2)

Forestry operations are well planned and RIL techniques help minimize logging damages. Following the ban on log export, 100% of the production is processed in Port Gentil. (5.3)

There is currently no conflict neither over the management of these NTFPs which are free of use nor of the other benefits from forests that are maintained and available (5.4).

Impacts on physical, biological and human environments were analyzed. Mitigation measures (negative impact) or enhancement measures (positive impact) were developed. On the other hand, to take the particular case of the Mandji FMU which overlaps on about 33,000 ha the buffer zone of the Moukalaba Doudou National Park, additional recommendations were proposed to make logging consistent with the status of that area. All of these recommendations (the entire FMU and those specific to the buffer zone) constitute "the special conditions of logging in a buffer zone" (5.5)

Harvest volumes are low, lower than the allowable cut. The harvesting of NTFPs is anecdotal (5.6)

6.1.6 - Principle 6 - Environmental Impact

ESIAs were conducted by TEREA in 2009 and 2011. This are quality studies, in compliance with legal requirements. The Mandji site ESIA is not yet approved by the Ministry despite reminders and mails from TEREA (6.1)

The fight against poaching is part of the company culture and focuses on participation in PROLAB and procedure SF PO 54 for wildlife protection and management of hunting activities (access control / regulation of weapons / sensitization policy / protein supply system). The local populations retain the right to hunt and PROLAB enforces the law (period, method of hunting, protected species ...). The management plan provides for conservation series that are complied with.

Natural windfalls and logging gaps are the driving force behind the natural regeneration dynamics. Tropical forests mode of operation with a harvesting rate of 1 to 2 stems per ha on average secures the natural regeneration of species /failed area. CBG has experimental mechanisms managed by the Smithsonian Institute (1 block of 50 ha including 25 ha inventory at 100% in 600 ha of non-exploitable
research series (SIGEO model) and 3 phenological paths (growth / fruiting) "simple Dynafor" model (Gembloux Nature +) (6.3)
All areas not affected by felling or paths (that is to say +- 90% of the surface) maintains a representative ecosystem functionality and the maintenance of conservation series and HCVFs ensures full protection of the most interesting ecosystems (6.4)
Occasionally, limited erosion is observed by the roadside and along some hauling paths in some particular areas of high relief and highly erodible silty and clayey terrains (Kivoro FMU sector). CBG established specific procedures (P030_FT3_Management of flows, PROC P030_Road construction V4 and PROCP P038_Hauling V2 to respect the maximum slopes and an original diking method along hauling paths to avoid the phenomena of very erosive water flow locally. Road construction is perfectly mastered and the management of quarries and their rehabilitation is also a strength of the company. Work quality monitoring is very intense through post-logging monitoring that generates quality premiums. (6.5)
CBG does not use pesticides and does not carry out wood treatment (6.6)
Recovery and waste management policy is perfectly mastered. The collection of oils is effective (35,000 liters / year) and all waste is collected, properly stored before being evacuated for the greater part to Port Gentil to IEG Company. Organic waste is also collected at the workshop and in the camp and regularly burned in a secure landfill (6.7)
CBG does not use biological control (6.8) nor the planting of exotic species (6.9).
No phenomenon of conversion of natural forest was observed nor denounced (6.10)

6.1.7  Principle 7 - Management plan
CBG has 2 MPs
- MP of KIVORO V FMU January 2009, period 2009/2034
- MP of RABI & MANDJI V2 FMU revised in January 2010, period 2005/2029
The content is validated by the administration, according to management standards revised in 2013. They are legally compliant and content also meets the requirements of 7.1. Objectives and concepts were described in § 1.3 of this report
The revision of the MP is possible according to management standards every 5 years.
A multi-year training was defined on the basis of the analysis of the duties performed within the company and the needs identified. The frequency of trainings is specified and the evaluation method is presented (7.3)
There is a technical summary of the MP (40 pages) and a popularized summary of the MP for the local populations (A3 sheet) which has been widely distributed. These are quality documents with a strong involvement in a process of simplification while maintaining technical accuracy (7.4)
6.1.8 - **Principle 8 - Monitoring and Evaluation**

Logging activities (inventory / felling / hauling / cross-cutting / transportation) are monitored regularly (once a month) by the forest sites managers. These data are generated monthly to enter the basis for the calculation of the quality premium and truly serve as tools for quality control. They are aggregated annually. (8.1)

In addition, there is an environmental monitoring program based on structuring elements:

- Hydrocarbon processing
- Collection and disposal of waste
- Monitoring of HCVFs
- PROLAB indirect monitoring of poaching
- RIL monitoring

CBG has a permanent monitoring device internally (phenological transects) and necessary cooperation with research organizations through collaboration agreements (Smithsonian's SIGEO device).

There is also a social monitoring (ATs monitoring + detailed analysis, OHSCs monitoring, monitoring of social achievements and funding ...)

These processes are functional and effective. They are actually used by the company to assess the management and change certain guidelines, where appropriate (8.2)

The whole traceability process is documented and effective (8.3)

- The annual report is well organized and comprehensive. It establishes a general comparison between 2012/2013 and takes into account historic data from 2009 for the oldest statistical series. It is available on CBG web page upon justified request (8.4)

6.1.9 - **Principle 9 - Maintenance of High Conservation Value Forests**

The study on HCVF V 4 of May 2011 (LAPORTE / VAN de POL) carried out by TEREA is particularly detailed, well documented in terms of maps and diagrams. It is consistent with the approach recommended by Proforest.

- Presentation of the concept of HCVF
- Characteristic and background of the Mandji CFAD
- HCVFs identification methodology
- HCVFs identification
- Conservation measures
- Specific relationship between HCVFs and the oil industry
- Monitoring and Evaluation

The 6 HCVFs are identified and addressed. Key company executives are familiar with the concept and importance of HCVFs (9.1)

Stakeholder consultation was rigorous and extensive. The study was conducted by a consulting firm, TEREA which has strong connections with NGOs and PP. In March 2009 the study is sent for consultation to scientists whose expertise is recognized in the field of forest ecology of the Gamba Protected Areas Complex, to about thirty representatives of international and national conservation NGOs, social NGOs as well as research organizations, institutions and independent consultants. The
local communities are consulted in the normal process of implementation of the MP (communication process, social units...) for type 5 and 6 HCVFs (9.2)

HCVFs management measures are specified for each type of HCVF after a detailed analysis of potential or actual threats (threat / CBG management summary table) (9.3)

The main measures are:
- Fight against poaching via PROLAB
- Respect of use rights and sacred sites
- Hunting ban for employees
- Roads closing / control
- Conservation series of the MP
- Monitoring of pioneer fronts
- RIL
- MMD/MCD
- Training / sensibilization on felling / hauling-quality control
- Logging rules specific to slope zone and high erodibility terrain
- Buffer strips
- Detailed mapping (hydro network, slopes, operating constraints

Indicators are detailed in the impact assessment. They are numerous and broadly detailed in the "summary table of the monitoring of forest management impact on HCVFs"
- Monitoring target
- HCVF concerned
- Activity
- Monitoring indicator
- Human means monitored
- Material means
- Monitoring report

Overall these are efficient, consistent and comprehensive indicators for all types of HCVFs, probably a little complex. Currently, a reassessment and simplification phase is underway by the Certification Manager (9.4).

6.1.10 - Principle 10 - Plantations

No plantation Principle NOT APPLICABLE

6.2 - Systematic presentation of results

** See auditors’ check-list in annexe C of the report.

6.3 - Identification, traceability and product tracking

6.3.1 - Description of the system implemented in view of ensuring traceability

During the logging inventory, trees of objective species are located, and assigned an "inventory number" (X + NNN). A plastic plate with that number, affixed to the trunk during the inventory, helps trace it
back in the forest. This plate is called "pre-felling plate". Information on harvestable trees (number, species, quality and diameter) are jotted down on the "counting sheet" of the logging inventory. Entering the information on the Management Information System (MIS) then allows the drawing up of the resource positioning map. During this step, the trees of secondary species located and marked on the ground, are not numbered and this in order to avoid an overload in the fieldwork.

Before logging, sorting allows to finally designate the trees that are to be harvested. Therefore, a "sorting sheet allows to know the position (location on the accompanying map) and the characteristics of the new foot, which is also numbered: “Prospection number” (X + NNN). This step also allows to assign a number to the species mapped in the logging inventory but not numbered. These two scenarios require the affixation of the "pre-felling" plate For feet with an inventory number, the prospection number is identical.

This information is entered on MIS in order to edit operating maps; they are then imported into the MICROBOIS software (first position).

During felling, a "forest Number" which is the official identifier vis-à-vis the Water Resources and Forestry Administration is assigned. A "felling sheet" allows to establish the link between the "Prospection number" and the "Forest number". This information is entered on Microbois, and through the export the Microbois file, it can be linked to MIS so as to display felled trees on the digital maps.

On the stump, the forest number is hammered by the feller and the "pre-felling plate" is affixed once again. The brand of the holder's hammer is also affixed. The feller also hammers the forest number on the trunk (see Hammering procedure).

The skidder operator must make sure that each log has a forest number hammered on its face. Otherwise, he himself writes that number with chalk (he will find hammered on the stump of the felled timber).

During cross-cutting on the timber yard, for each log, the forest number is complemented by a number ranging from 1 to x, with x being the number of logs resulting from cross-cutting). A "cross-cutting sheet" allows to save the new information while this number is hammered on the logs.

A new "cross-cutting" plate is affixed, marked "Mandji CFAD"; it assigns a new number to each log for internal monitoring. These numbers range from 1 to 99999. Therefore, the binomial "cross-cutting plate number / Forest number" gives a unique identifier to each log.

The logs are removed by truck to the landing pier timber yards of the CFAD, possibly via a transit yard. For each shipment a "Bill of rolling" is completed and accompanies the shipment. They will then be loaded onto a flat for towing to Port-Gentil accompanied by a bill of towing.

6.3.2 - Description of the final location of log management

Logs from the CFAD are received on the CBG's Bon Abri timber yard. This timber yard is the point of loss of responsibility for the CFAD.
6.3.3 - Description of the documentation system or marking of products
All logs from the Mandji CFAD carry the plate "Mandji CFAD". The binomial "cross-cutting plate number / Forest number" allows (through the Microbois software) to instantly know the date of felling of the tree from which each log originated and the position of its stump (AAC / FMU).

6.3.4 - Evaluation of the risk of log mixing
On the timber storage yard in Port-Gentil (Bon Abri) used for logs reception by CBG, there is a risk of mixing: For okoumés. Okoumé logs from other CPBG suppliers (Rougier, BSO) go through the same storage locations as CBG's logs. There may therefore be a risk of mixing with okoumés from uncertified suppliers (BSO).
To avoid mixing, all the logs are checked in upon arrival. The okoume logs from CBG's CFAD are easily recognizable thanks to the hammer CBG and the plate "Mandji CFAD". They are classified upon arrival on the timber yard and are marked by painting per section: Section number on a white square.

6.4 - Controversial elements
No controversial element was identified by the Audit team.

7 - Scope of certification
Forest development and exploitation of 568,543 ha of tropical forests in Gabon on the Mandji CFAD (Mandji, Rabi and Kivoro FMUs) for the production and marketing of quality logs and veneer logs to CPBG and CBG factories in Port Gentil.

7.1 - Geographic boundaries of the entity
The geographic scope covers the Mandji CFAD (Mandji, Rabi and Kivoro FMUs) for a total area of 568,543 ha.
It includes logging and timber transportation activities until the change of ownership of the logs, that is to say to the landing pier of Bon Abri in Port Gentil because it is the end point of barges and their diesel oil supply area.

7.2 - Limitation at the level of forest products
All forest products deriving from the exploitation of audited CFAD forests are covered by the certificate.

8 - Proposals for the certification decision
8.1 - Explanation of the overall rating system, weighting or any other decision making system used
The audit has applied no rating or weighting system in the course of the initial audit.

Actually, the overall requirements were considered as having the same importance, each criteria needed to be satisfied by the entity applying for certification. Nonconformity was evaluated against each indicator.

Indexes, specified in the checklist, should be considered as an user manual for the auditors.

8.2 - Clear description of all recommendations, conditions or pre-conditions associated with the proposed certification

<table>
<thead>
<tr>
<th>No.</th>
<th>Ind.</th>
<th>Title of observation</th>
</tr>
</thead>
<tbody>
<tr>
<td>RA</td>
<td>2.1.5</td>
<td>The company should update the monitoring of agricultural fronts across the Mandji CFAD and complete / finalize the participatory definition and delimitation of agricultural series</td>
</tr>
<tr>
<td>RB</td>
<td>2.3.1</td>
<td>In the procedures, the existence and treatment of oral complaints is not formalized</td>
</tr>
<tr>
<td>RC</td>
<td>4.1.7</td>
<td>The implementation of social projects has been delayed</td>
</tr>
<tr>
<td>RD</td>
<td>4.2.1</td>
<td>Significant delays were witnessed in the notification of the results of medical examinations to the workers concerned (more than six months after the check-ups), which may cause, where applicable, their situation to worsen before the next examinations</td>
</tr>
<tr>
<td>RE</td>
<td>4.2.9</td>
<td>The company should ensure a rigorous monitoring of expiry dates of medicines and anticipate future needs.</td>
</tr>
<tr>
<td>RF</td>
<td>5.6.2</td>
<td>Ensure the implementation of measures to improve the quality of logging inventories</td>
</tr>
<tr>
<td>RG</td>
<td>7.3.1</td>
<td>The 2009 training plan has not been updated or reviewed</td>
</tr>
<tr>
<td>HR</td>
<td></td>
<td>Systematically specify for each technical document, report or data sheet, the completion date and version.</td>
</tr>
</tbody>
</table>

Additional comments on the observations

**Observation RA**: Consultation with the Yeno community reveals that agricultural series is not known or demarcated. The monitoring of agricultural fronts on the CFAD is outdated, and this constitutes a risk factor.

**Observation RB**: The procedure for the management of conflicts in connection with land rights and use rights (SF-P050 of February 2012 Version 03) does not provide for verbal complaint from the communities, particularly in this context where the majority of the community can neither read nor write.

**Observation RC**: It is appropriate to take stock given the constraints identified and sensitize communities and territorial administrations actors on the roles they must play for the well-being of the populations living in and around the Mandji CFAD.

Many obstacles to the implementation of these achievements are not the responsibility of the company.
Observation RD: Following medical examinations conducted by Dr. Dimitri MBETHE in April 2013, 7 workers were recommended for specific exams (due to inguinal hernia or hypertension). The personnel department notified them late, during the month of November 2013 prior to their departure on leave, or more than six months after the whole visit, and this may constitute a risk of worsening of the disease or injury.

Observation RD: The verification of stocks of medicines at the infirmary in Rabi allowed to notice the presence of two drugs whose expiry dates were very close (June and July 2014).

Observation RF: Inventory procedures meet national standards but in 2010/2011 there was a loss of quality in the realization of inventories (loss of competence and motivation of prospectors). The company implemented in 2013 a method of quality control and premium that once again helped make the results more reliable for 2014 (ex: AAC 10 of MANDJI). However, there is currently on the ground many logs on which plates are affixed once again during sorting (forgotten during inventory or lost the plate), and this makes the mapping process and traceability heavier. Therefore there is a risk of exceeding the authorized volume of the AOP in case of systematic underestimation of the inventory. DFs finalized in 2013 show that there is no exceeding of the total harvestable volume but sometimes there is a significant overshoot in volume (> 20%) for some species (e.g. Bilinga) compared to AOP forecasts which may pose a risk dispute with the administration. For the record, note that there is a doubt between sections 60/65 of Decree 689 of 2004, which speaks only of “total volume” while the National Forest Management Technical Guide which speaks of “volume per species”. In addition, volumes in the AOP remain to be taken with some precautions as there are many uncertainties about the quality assessment of standing trees and the method of scaling rate. Note finally that a logging inventory is the essential element for the programming of RIL and short-term economic projection (harvestable volume in the year). It is therefore essential to ensure total reliability of this tool.

Observation RG: There is a methodological study and assessment of needs that resulted in a proposal for a training plan but that was not totally appropriated and valued. The trainings considered as the most essential (felling / hauling, health, security, mechanics ...) are regularly provided and there is a continuous learning process (Feller / Help feller - Driver / Assistant driver - Prospector), but other fields of training could be explored (ecology, conflict management, business management ...)

Observation RH: no particular comment.

### 8.3 - Minor corrective actions requests

<table>
<thead>
<tr>
<th>No.</th>
<th>PCI FSC</th>
<th>Non-compliance</th>
<th>Evidence</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>R1</td>
<td>4.2.5</td>
<td>All managerial staff do not systematically wear all the required PPE</td>
<td>On the ground in the forest, some CBG managerial staff do not systematically wear safety shoes when they control or visit sites on which risks were identified by previous analysis.</td>
<td>12 months</td>
</tr>
<tr>
<td>R2</td>
<td>4.2.7</td>
<td>The sleeping conditions of</td>
<td>The house at the barrier on the Mandji / Yeno highway</td>
<td>12</td>
</tr>
<tr>
<td>No.</td>
<td>PCI FSC</td>
<td>Non-compliance</td>
<td>Evidence</td>
<td>Deadline</td>
</tr>
<tr>
<td>-----</td>
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</tr>
</tbody>
</table>
|     |         | workers in advanced base and in the boxes near the barriers are not completely satisfactory | is invaded by runoff during heavy rains  
• The tarpaulin camp of AAC 8 UFG 2 of the Rabi FMU does not meet the minimum requirements  
  o The bedding provided does not have the minimum required comfort (risk of back pain)  
  o The installation of tarpaulins does not guarantee adequate protection in case of bad weather. | months |
| R3  | 4.2.9   | Regular breaks in supply at the store in Rabi are taking alarming proportions. | Consultation of staff representatives and residents of base camps allow to confirm these breaks.  
• Actions initiated by the Management to meet these shortages are not satisfactory so far. | 12 months |
| R4  | 4.2.9   | The company did not provide sufficient notice on the non potability of water. | Following the February 2014 water analysis, the results showed a water bacteriologically contaminated and unsafe on both sites (Rabi and Peny).  
• A memorandum signed by the Corporate Office was displayed, but no sensitization was carried out on any of the sites. Workers and families continued to consume this water. Furthermore, the procedure (HSE P014 of February 2012) to guarantee the potability of water in base camps was not respected in the semi-annual sampling). The latest analysis dates back to 15/02/2013. | 12 months |
| R5  | 6.5.7   | The construction of the track network does not always completely minimize the risk of sporadic erosion | Flows observed in the field are well positioned and in sufficient density, but sometimes some of them are not functional and do not allow adequate drainage of water as specified in the procedure “GF_P030_FT3_Management of flows”  
• The creation of a particularly impacting flow (80 m long, 3 m wide and 2 m deep) was noticed on the track near Yard 19 on the Kivoro site | 12 months |
| R6  | 6.6.5   | All risks of point pollution are not completely mastered in the Rabi workshop area | The current management of contaminated soil is not fully compliant with the existing procedure (no evacuation by Big Bag). Currently soil is stored in a dumpster riddled with holes in the open air without any real possibility of controlling leachate.  
• The mechanical workshop does not have an impermeable slab limiting any risk of accidental pollution (but there is a procedure for cleaning in case of spillage).  
• Limited pollution residues are visible from both sides of the retention slab of the diesel oil station. | 12 months |
| R7  | 6.7.1   | On the Rabi site, used batteries awaiting disposal for recycling are not systematically stored appropriately | The batteries awaiting disposal are stored outside at the entrance of the office in a container adapted to transport but whose deteriorated lid was not replaced.  
• 2 old batteries were observed in the pit meant for... | 12 months |
### Comment on minor non-compliance.

**NC No. R1**: this observation was made only 2 times. The managerial staff concerned do have their PPE and their safety shoes in their vehicles. It is therefore a carelessness rather than a systematic attitude. No particular accident was reported with regard to this category of staff and the non-compliance is one-off. The CAR is therefore a minor one.

**NC No. R2**: CBG made it clear to the audit team during the opening meeting that the advanced base camp was temporary and in a test phase and proactively asked the auditors to evaluate this aspect. The situation is actually non-compliant (poor bedding and badly installed tarpaulin), but is not made to last. Interviewed workers mentioned the difficult living conditions but they all volunteered to come to this remote camp that makes it possible for them to benefit from additional isolated post allowance. Water and food supply is guaranteed. There is no conflict or specific complaint and workers return every weekend. Travel time saved every day also allows for more interesting days for teams and improve the performance bonus.

CBG is already considering a more efficient solution (an order for building timber was placed at CBG's factory in Port Gentil) which will be implemented in a near future.

The problem of the house at the Mandji barrier is very specific and is being resolved (installation of clapboard in the bottom side).

These housing conditions are temporary and are being resolved, the NC is therefore minor.

**NC No. R3**: The supply of the Rabi base camp is complicated and depends on the goodwill of Cékado in Port Gentil. CBG put to use all the energy (meeting, contact, pressure,..) and all the facilities to ensure the supply (staffing and trucks). CBG is currently planning to develop a land-based logistics system via Lambaréné. In addition, the company has contracted local fishermen who supply the site with fresh fish.

The problem was identified and after several attempts, an effective solution is being implemented, the NC is therefore minor.
NC No. R4: Further analyses were commissioned before the audit to ensure that poor analyses are not due to mishandling. The results are expected. The display and information procedure (boil water) as well as distributions of bottled drinking water was not well implemented on the Peny site whereas it was perfectly done on the Raby site where active communication was carried out (meeting with workers, "do not consume" pictograms on the taps ...). No impact on the population was found, in particular through the consultation register of the infirmary.

Here, the non-compliance concerns the completeness of the remedial action taken by the company in the Peny camp pursuant to these test results, not the regular monitoring of water quality by it or potential effects on the health of users. The CAR is therefore a minor one.

NC No. R5: The ditch built near the forest timber yard is actually impacting. Discussions in the field about it suggests that the engine driver wanted to solve once and for all a problem of water accumulation which was hindering the approach of trucks and the loading of wood and which eventually would have rendered logging impossible in the area. It should be noted that this is a main operating road that requires a consistent drainage system during the rainy season.

The company has assessed the situation and will apply the procedure of restoration of degraded sites. This is a point observation that does not undermine the performance of the company that also has a great experience in creating and maintaining tracks, qualified staff and available equipment (grader, bucketwheel reclaimer conveyor, compactor). The CAR is thus maintained at a minor level.

NC No. R6: The Raby workshop is not completely compliant and there are spots of very specific and localized pollution. CBG has demonstrated its commitment to the total reconstruction of a workshop on the site, so as to avoid such impacts. Plans are established, funding is budgeted in 2014, work should thus begin this year. The NC is one-off and is being resolved, is therefore minor.

NC No. R7: Waste management is really a positive point of the company and is part of its culture. Procedures exist and are implemented; the staff is sensitized. These 2 findings truly reflect human error (lid not replaced and battery in the waste pit). By its very one-off nature and the compliance of the company on other aspects of this non-compliance (sensitization, operational waste management infrastructure) the non-compliance is classified as minor.

NC No. R8: The diking method, which consists in opening a series of small depression in the slope of the skidding trail helps prevent water from taking speed and causes erosion. This is an original and symbolic measure within the framework of CBG's RIL policy but it is not really described and not necessarily always applied by bull drivers with discernment and moderation. Its effectiveness has never been tested through a simple experimental comparison protocol of various modalities of diking intensity. For all that, it is highly probable that it is a good method. Moreover, the impact of logging is relatively well controlled by CBG (systematic recovery of skidding trails and elephant tracks, quality control ...).

The gap does not lead to an environmental impact but concerns the formalization of the preliminary study and the monitoring of this new method, the NC is therefore minor.

NC No. 9: no particular comment.

8.4 - Major Corrective Action Requests

No major non-compliance identified
8.5 - Auditors’ conclusion on whether the forest entity has reached or not the required level of conformity

CBG has now reached a very satisfactory level in its answers to the certification requirements. Several positive points are particularly notable:

- Complete mastery of its trade:
  - Rigorous and extended implementation of low impact logging techniques
  - An efficient traceability protocol coupled with a very good logistics
  - Experience in construction and maintenance of road with dedicated hardware

- Taking into consideration of environmental aspects enshrined in the culture of the company:
  - HCVF study particularly detailed and relevant
  - Management of operational waste and adapted to the feasibility conditions of the country
  - Fight against poaching and boundary monitoring

- A monitoring process which is a real management tool for the company:
  - Monthly monitoring that allows to define a quality premium
  - Annual strategic analysis and effective reporting both in terms of substance and form

- A peaceful internal and external social climate:
  - High sensitivity on health / safety aspects
  - A medical evacuation procedure building on the resources of oil companies.
  - Relevant social achievements

CBG is holder of a FSC certificate since 2009. We believe that this is undoubtedly one of the most successful companies in the Congo Basin. The renewal audit raised no major non-compliance and the audit team recommends the renewal of the certificate.

9 - Certification decision

Deliberation: Following the examination of the renewal report referenced “AR 140403A Rapport AR FSC FM CBG [28 04 14] - committee”, Bureau Veritas decides to renew the FSC forest management certificate to the organization “Compagnie des Bois Gabon.” This certificate issued on 2 June 2014 is valid for 5 years under the condition of meeting the 9 minor non-compliances raised in the renewal audit report within the required deadline (next surveillance audit).

Drafted on 14/04/2014, revised on 30/04/2014, finalised on 03/06/2014.
Herve MOINECOURT  
Nicolas PERTHUISOT