Corrective Action Verification Audit (CVA) Report

Organization: Syndicat des Producteurs Forestiers du Sud du Québec (SPFSQ)
Cert/Ver/Val Code: SW-FM/COC-004614
Report Date: September 26, 2014

I. AUDIT PROCESS

Auditor, Qualifications: Nicolas Blanchette, For. Eng., M.Sc. MBA, Socio-economic issues
Forest engineer since 1996, Nicolas was introduced to forest certification as part of his undergraduate training in Canada and Central America. He acquired a thorough knowledge of the FSC certification program through his involvement in this organization in New Brunswick, at the office of FSC International in Mexico, as coordinator of the Quebec Development Initiative of the FSC standard and as consultant for FSC Canada in Toronto. He actively participated in the development of the Boreal and Great Lakes St-Lawrence standards. He is a certified Lead Auditor according to the ISO 14001 standard as well as for FSC by the Rainforest Alliance Registrar. His many years of experience with the FSC certification program make Nicolas a versatile auditor. He also supports companies to move toward or to maintain certification of forest management and chain of custody through his INCOS Stratégies business.

Yves Bouthillier, Biol. M. Sc., Socio-economic issues
Forest Management Coordinator for the Rainforest Alliance’s forest certification division, Yves is a biologist with a FSC Forest Management Lead Auditor Training and master in forest ecology from the Research Centre on Water, Earth, and the Environment of the INRS University. The subject of his master’s project was the evaluation of the effect of lake-level variations on the growth of riparian forests near the La Grande hydroelectric complex. During his baccalaureate in biology with a concentration in conservation and environment at Laval University, he worked on a renaturalization project for riparian shores of private properties of Lac St-Charles and was a trainee in urban forestry for the City of Québec for the control program against the Dutch elm disease. He also worked at the redaction of a recommendation report for retention basins with filtrating vegetation for storm water runoff.

Audit Date(s): July 9, 2014 and September 26, 2014
CVA Type: Desk review  On-site Location(s):
July 9: Club de chasse et pêche Compton (succession cutting, partial cut), Newport Canton (commercial thinning), Wotton (road network, white pine plantation thinning), Notre-Dame-de-Ham (cut improvement and thinning), Ham-Nord (partial cut)
September 26: Dunham (manual work), Cleveland (mechanized work), Stratford (manual work), Hampden (mechanized work), Milan (manual work).

Audit Overview: Nicolas Blanchette received documentary evidence from Thursday, July 3 until the week of July 14, 2014. Two field visits took place. The first was on July 9 where Nicolas Blanchette visited operations of three OGC (joint management group): Aménagement forestier et agricole des Sommets, Aménagement forestier coopératif de Wolfe and Aménagement forestier coopératif des Appalaches. On September 26, Yves Bouthillier visited operations of four OGC: Groupement Forestier de la Haute-Yamaska, Groupement forestier coopératif St-François, Aménagement forestier coopératif de Wolfe and Aménagement forestier coopératif des Appalaches.

Changes to Scope since last Audit: No changes

II. NON-CONFORMITY REPORT (NCR) EVALUATION

<table>
<thead>
<tr>
<th>MAJOR NCR #</th>
<th>05/13</th>
<th>NC Classification:</th>
<th>Major X</th>
<th>Minor</th>
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</thead>
<tbody>
<tr>
<td>Standard &amp; Requirement:</td>
<td>Indicator 5.1, FSC-STD-30-005 (V1-0) FSC standard for group entities in forest management groups</td>
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<td>Report Section:</td>
<td>2.5</td>
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NC description and related evidence:

2013 Finding:
There is no list of owners made to allow the monitoring of members (insertion or withdrawal date, reason for withdrawal reason, turnover rates). Therefore, it lacks a tool to further document this turnover.

2014 Finding:
The new ENR-03-01 document has been modified to include all information as required by the FSC standard. During the audit, one of the OGC was not in conformance with the new procedure and didn’t used the new version of the ENR-03-01 document.

Corrective Action Request:
The organization shall implement corrective actions to demonstrate its compliance with the requirements or above.
Note: Effective corrective actions focus not only on the particular situation described above, but also the root cause in order to prevent recurrence.

Compliance deadline: Within the 3 months following the finalisation of the report (by August 20, 2014)

Evidence provided by the organization:
- OGCs updated member list
- Communications with the group leader and some of their group members

Findings for the evaluation of evidence:
The SPFSQ has provided the auditor with an Excel™ file entitled “Registre groupements membres certifiés”. This register reports present and past members of OGGs who acceded to forest certification. The provided register includes the following information provided by OGC: member's
name and contact information, woodlot and property area, if the owner is certified and since when, the withdrawal date and reasons where applicable. A summary tab shows the number of owners by OGC, the associated areas, and specifying whether they are certified or not. A final tab describes the variations observed in the group since the certificate was obtained in 2010.

The SPFSQ is in conformance with the requirements of the standard. The NCR is closed.

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<tr>
<th>NCR Status:</th>
<th>CLOSED</th>
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**MAJOR NCR #** | 01/14 | **NC Classification:** | Major X | Minor |
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<tbody>
<tr>
<td><strong>Standard &amp; Requirement:</strong></td>
<td>Indicator 4.2.1, Rainforest Alliance standard adapted locally for the evaluation of the forest management in the Great Lakes/St-Lawrence region, with modifications to accommodate small and low intensity managed forests (SLIMFs) – August 2010</td>
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<td><strong>Report Section:</strong></td>
<td>Appendix IV</td>
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**NC description and related evidence:**

**Requirement:**
All forestry workers are in conformance with all provincial requirements relevant to health and safety.

**Finding:**
The field observations in the three OGCs highlight several shortcomings including workers without protective eye wear or having a broken visor, not wearing a safety helmet when disembarking the machinery, a lack of bandage with the worker, machinery without fire extinguishers, not verified or without proof of verification, the shovel and feller head not deposited when the tractor engine is stopped.

A non-conformance on the compliance of the requirements of health and safety at work was issued in 2012 (01/12). The FSC rules dictate that recurrent non-conformances are automatically upgraded to a Major NCR.

**Evidence:**
- Site monitoring Report
- Staff interviews
- Field observations

**Corrective Action Request:**
The organization shall implement corrective actions to demonstrate its compliance with the requirements or above.

**Compliance deadline:**
By August 20, 2014

**Evidence provided by the organization:**
- Field visits
- Observations and interviews with forestry workers and OGC personnel
- Documentary evidence

**Findings for the evaluation of evidence:**
The evidence and interviews carried out revealed that forestry workers are informed repeatedly of SST (occupational health and safety) during the year. Before the beginning of the seasons of operations, the OGC invite forestry workers as well as contractors to a mandatory meeting to review, among other things, the requirements of health and safety. Training records were presented to the auditor, records that demonstrate the participation of the vast majority of workers. Furthermore, meetings of health and safety committees recently took place highlighting the importance of respecting the SST requirements for all workers including brush cutters, loggers and machine operators. Attendance records were presented to the auditor.
Interviews with forestry workers have validated their knowledge of SST meetings.

OGCs are all part of the ASSIFQ, a mutual association in health and safety. The mutual association has the responsibility to evaluate SST procedures of OGCs and demand improvements when procedures are faulty or not met. A monitoring is done by the mutual association to ensure that the recommendations have been implemented by the OGC.

OGCs have procedures to notify workers if they do not comply with legal (e.g., SST) and contractual requirements. It is expected to notify the recalcitrant or non-compliant worker at first with a verbal warning. The next step involves a written notice otherwise an unpaid leave. Ultimately, the dismissal of the worker may be required. An OGC has incidentally fired a worker this spring of 2014.

Periodic monitoring of compliance with SST requirements are carried out during forestry operations. OGCs use a variety of means to carry out the monitoring on the sites. Some use tracking sheets while others take notes to add to the files of those sites. SPFSQ procedures provide forms to record non-conformances during internal audits. Examples of non-conformances observed in 2014 at the AFCA, the GFHY and AFCW were presented to the auditor (i.e. Absence of extinguisher, no procedures for isolated workers, no compressive bandage, broken visual protector, failure to wear a safety helmet in the forest). The monitoring carried out by non-conformities of OGCs and their corrective actions were also analyzed.

During the first field visit of July 9, 2014 by Nicolas Blanchette, observations of non-conformities were observed in two out of three OGCs. These deviations from the SST requirements are: absence of a compressive bandage with logger, no airtight cap on the gasoline container, no cap on gasoline container when refueling, no dry chemical extinguisher on hand, saw-head not deposited, leaking dispensing nozzle, non-compliance with the three bearing points for raising and lowering a machinery, non-verified extinguishers on machinery (one since December 2010), starting the chainsaw within 3 meters from where refueling has been made.

On the second field visit of September 26, 2014 by Yves Bouthillier, the applicant had developed and implemented an action plan to target non-conformances during the visits of July 9, 2014. The auditor observed the effectiveness of this action plan in the field, since no differences were observed on the four OGCs visited.

Considering the efforts made by the OGCs and the SPFSQ since the annual audit, this Major NCR is closed. Observation 05/14 is issued, as it is suggested that all OGCs improve their procedures to enable more effective monitoring (documented and archived) of the compliance with the SST requirements for each worker.

### III. CONCLUSIONS

| NCR Status: | CLOSED |
| Comments (optional): | See OBS 05/14 |

☑️ No follow-up required related to closed NCRs
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<tr>
<td>□ Original NCRs closed and new NCR(s) issued, see section IV below</td>
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<tr>
<td>NCRs Open:</td>
<td>□ Certification/Verification/Validation not approved; conformance with NCRs required</td>
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<td>□ Major NCRs not closed; suspension of certification/verification required</td>
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<td>□ Minor NCRs are upgraded to Major; see section IV below</td>
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<td></td>
<td>□ New NCR(s) issued, see section IV below</td>
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<td>Comments/Follow-up Actions:</td>
<td>See OBS 05/14</td>
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### IV. OBSERVATIONS:

**OBS 05/14**

**Standard & Requirement Reference:** Indicator 4.2.1, Rainforest Alliance standard adapted locally for the evaluation of the forest management in the Great Lakes/St-Lawrence region, with modifications to accommodate small and low intensity managed forests (SLIMFs) – August 2010

**Description of findings leading to the observation:** The analysis procedures suggest that a reflection would be appropriate to promote better implementation and performance management of OGCs regarding compliance with SST requirements by workers. For example, despite the monitoring by the SPFSQ and the OGCs, it was noticed that the notice of non-conformance with SST requirements of workers were not necessarily documented and archived, and therefore, it could be difficult to establish and to know the performance of a particular worker.

**Observation:** OGCs should improve their procedures to enable a more effective monitoring of conformance with SST requirements by workers.

### V. AUDIT REPORT APPROVAL

**Note:** a formal Q-09 Report Review and Approval (RRA) Checklist conducted by an independent, authorized reviewer is required when the CVA results in certificate/verification/validation issuance or suspension/termination, or when there is a change in scope. In all other cases, the report may be approved with the 2nd checkbox below by an authorized RRA reviewer which may be the CVA auditor, or by a Senior Auditor.

□ Refer to separate Q-09 RRA Checklist

□ Report approved by way of this checkbox

Approved by:

Date:

□ Salesforce has been completed with applicable files uploaded, and is updated based on any changes to the Organization details or other areas relevant to the CVA.