Public Summary Report for Forest Management
2014 Annual audit Report for:

Rougier Gabon
in
Libreville, Republic of Gabon

Report Finalized: January 22, 2014
Audit Dates: November 9-15, 2014
Audit Team: Alexandre Boursier
Adolphe Ondoua
Ugo Lapointe
Emmanuel MveMebia

Certificate code(s): RA-FM/COC-006621
Certificate issued: October 4, 2013
Certificate expiration: October 3, 2018

Organization Contact: Paul Emmanuel Huet
Address: 75 avenue Champs
Elysées, Paris, France

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

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

1.1. Auditors and qualifications

<table>
<thead>
<tr>
<th>Auditor Name</th>
<th>Auditor role</th>
<th>Lead Auditor, socioeconomic aspects</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alexandre Boursier</td>
<td>Auditor role</td>
<td>Lead Auditor, socioeconomic aspects</td>
</tr>
<tr>
<td>Adolphe Ondoua</td>
<td>Auditor role</td>
<td>Forester, CoC auditor</td>
</tr>
<tr>
<td>Ugo Lapointe</td>
<td>Auditor role</td>
<td>Forest ecology</td>
</tr>
<tr>
<td>Emmanuel Mvê Mebia</td>
<td>Auditor role</td>
<td>Legality, socioeconomic aspects</td>
</tr>
</tbody>
</table>

Qualifications:

A professional forester since 1996, Alexandre has experience working in Africa, Asia and South, Central and North America in forest certification, education, forest inventory, community forestry and natural resources management. From 2004 to 2013 he was the country manager for Rainforest Alliance in Canada. Alex has a Master's degree in social-forestry and is a sustainable forestry specialist, a Forest Stewardship Council (FSC) senior assessor and lead auditor trainer. He has conducted numerous stakeholder consultations, developed sustainable forest management and legality standards and executed a large number of forest management assessments worldwide. In his forest management assessment activities, Alex routinely works with multidisciplinary teams of people of different national and cultural backgrounds. He is fluent in English, French and Spanish. Alex recently completed the Sustainable Agriculture Network (SAN) Lead auditor training. He currently lives in Sri Lanka. Alex completed the Sustainable Agriculture Network (SAN) Lead auditor training in 2014.

Qualifications:

Forest engineer with Master's degree. M.Ondoua is Rainforest Alliance's representative in Cameroon. He worked for two years at the ministry of forests and wildlife of Cameroon, as well as for Rougier from 2003 to 2008. M.Ondoua was also auditor with the Independent Observer. He was trained as Lead auditor by the Rainforest Alliance for forest management and chain of custody.

Qualifications:

Ugo is a senior auditor for the Rainforest Alliance team. As a biologist/ researcher who specialized in forest ecology, he joined the Rainforest Alliance in 2011. Until December 2013, he held the position of coordinator of FSC certification in Quebec before working with the Rainforest Alliance as a consultant. Ugo completed the Rainforest Alliance FSC auditor training for the forest management and for the Chain of Custody as well as the Lead auditor ISO 14001 training.

Qualifications:

Emmanuel Mvê Mebia holds a DESS (Master in advanced studies) in Ecotourism integrating Baka indigenous populations. He worked for 7 years as an anthropologist for the WWF Gabon Program (Minkebe and Gamba Projects), he is responsible for the socio-economic aspects and indigenous populations. He has contributed to the development and implementation of several projects related to the conservation of the Massif and the Minkebe National Park and Loango Park. Emmanuel was involved in the cross-border socio-economic study as part of the TRIDOM project (2003). He also participated in the 3rd Symposium on European African Studies in Leipzig. Emmanuel has been a member, since 2005, of the International Working Group on Indigenous Populations (IWGIA) and IPACC (Indigenous Peoples of Africa Coordinating Committee), the UN body dealing with the legal aspects. He has been a member of the IUCN-TILCEPA since October 2011.
### 1.2. Overview of sites visited

<table>
<thead>
<tr>
<th>Type of site</th>
<th># of Sites Visited</th>
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</thead>
<tbody>
<tr>
<td>☐ Head office</td>
<td></td>
</tr>
<tr>
<td>☐ Forest districts</td>
<td></td>
</tr>
<tr>
<td>☑ Forest sites</td>
<td>CFAD de Léké; CFAD de Moyabi; CFAD de l’Ogooué-Ivindo</td>
</tr>
<tr>
<td>☐ Other sites:</td>
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</table>
2. AUDIT FINDINGS AND RESULTS

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

<table>
<thead>
<tr>
<th>Issue</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ Changes in the forest management of the FME have occurred since the last audit</td>
<td>Since the last audit, there were cuts within the Rougier Gabon team and significant changes within the management staff. Budget cuts and staff turnover has reduced the company's ability to monitor its procedures and resulted in a loss of knowledge of FSC requirements. These changes have helped to reduce the level of conformance of the certification requirements. Thus, in the audit context, the auditors identified several elements to be improved to ensure conformance with the requirements of the standard. These items are presented in the section on non-conformities. In recent weeks, a new director is in place with the mission to restructure the company. Rougier Gabon thus benefits from a capital injection that allows it to hire additional human and material resources. The forest management has not changed as such between 2013 and 2014. The addition of personnel is obviously positive in terms of conformance with the standard.</td>
</tr>
<tr>
<td>☐ Updates to group member list <em>(if yes, see section 2.5 below)</em></td>
<td></td>
</tr>
<tr>
<td>☐ Changes in the forest management standard used for audit have occurred since the last audit</td>
<td>No changes</td>
</tr>
<tr>
<td>☒ Stakeholder comments on the forest management of the FME were received</td>
<td>Comment summary and RA response: See below</td>
</tr>
</tbody>
</table>

**Stakeholder comment:**
Stakeholders pointed out that the penalties for illegal ivory trafficking in Gabon were very low, which limited their deterrent power.

**RA Response:**
The FSC standard requires that the laws be respected within the certified territories. The fact that the legal system provides for penalties that are not sufficiently dissuasive represents a challenge to the certificate holder which works to enforce laws on its certified territory. Criteria 1.5 and 6.2 require that the certificate holder shall develop and implement mechanisms to ensure compliance with laws on the certified territory. However, auditors find gaps in the implementation of the mechanisms developed by Rougier and its partners. Major NCRs 01/14 and 10/14 are issued.

**Stakeholder comment:**
A community said to be in conflict with Rougier Gabon about a forest access issue, and there is no resolution in sight.

**RA response:**
The auditors find that social workers involved in the implementation of the dispute resolution procedure of Rougier Gabon has no training or clear instructions for them to distinguish the complaints, grievances and disputes. Rougier Gabon has not engaged its dispute resolution process in this case, when it should have been done. This is a non-conformance. NCR 02/14 is issued.

**Stakeholder comment:**
One interested party indicated that there is currently no order to formalize the CFAD (sustainable development forestry concession) in Gabon.

**RA response:**
Since the assessment audit, Rougier Gabon has sent a request for CFAD allocation of Léké to the Ministre des Eaux et Forêts in October 2013. A pilot mission assignment by the Ministry was made one month later in November 2013. Since then, draft texts were written and sent to the Prime Minister for review. The auditors met the Director General of Eaux et Forêts in Libreville, who assured them that Rougier Gabon, like other forestry companies in Gabon, was not responsible for this state of affairs, that the company benefited from a letter of the Minister acting as accrediting authority, and there was therefore no situation of irregularity in relation to legal requirements.

**Stakeholder comment:**
Stakeholders reported that housing conditions for Rougier workers are inadequate.

**RA response:**
During the field audit in November, the visit to the base camp of SETRAG showed that the housing conditions of the workers were not adequate. The auditors found that the workers and their families did not all have any access to drinking water, waste piles were visible around the camp and all the families of the workers had no mosquito nets. When leaving the field and to begin writing the report, NCR 13/13 remained open and was upgraded to major. Thus, Rougier Gabon immediately proceeded to significant improvements in the camp before closure of the report, which enables the closure of NCR 13/13.

**Stakeholder comment:**
According to two interested parties, salary conditions are inadequate compared to the guaranteed minimum wage (SMIG).

**RA response:**
Gabon SMIF requires a minimum monthly salary of 150,000 FCFA for all workers. During the audit, an audit of about fifty pay stubs to the personnel department has identified a case in this sample who had a salary of 144,000 FCFA, which is less than the minimum monthly income of 150,000 FCFA. NCR 06/14 is issued.

**Stakeholder comment:**
Representatives of several villages expressed to auditors several complaints about particular projects funded with the local investment fund.

**RA response:**
The auditors found that the identification, tracking and resolution of complaints by Rougier Gabon were deficient. The standard requires that the manager maintains a complete and updated record of all the complaints against the company and the actions taken to resolve them. However, the auditors found that several grievances in the villages were not identified nor in the process of being resolved. This is a non-conformance and NCR 09/14 is issued.

**Stakeholder comment:**
Stakeholders have reported their general concerns about the economic situation of the forestry sector in Gabon. According to these many companies are closing. The situation is exacerbated by the delay of the Gabonese government on refunds of TVA (value added tax). Hundreds of billions of FCFA have not been reimbursed to the businesses of the forestry sector.
**RA response:**
Cash flow difficulties of the Gabonese government and shortfalls reduce the scope of investment companies. Compliance with FSC certification requirements requires significant investment in human and monetary resources. Like all other forest companies in Gabon, Rougier Gabon are living this situation. The company also had to significantly cut its staff in recent years. Auditors also find several non-conformances with the FSC standard this year (see section 2.6 below). The new Rougier Gabon management has a clear mandate to turn the company around and a lot of staff was also hired. Auditors find a firm and resolute desire to restore the conformity of Rougier Gabon.

**Stakeholder comment:**
One interested party mentioned that Rougier Gabon sells a small portion of the harvested wood for sawing and that this transformation process generates a lot of waste in the timber.

**RA response:**
Since the audit was an annual audit and the audit did not cover the principle 5, the use of the harvested timber has not been evaluated in detail. However, the auditors found that the organization gives downgraded sawmill products to its employees and local communities in order to reduce losses. However, there is little opportunity for the sawing by-products. For this reason, the company has initiated a charcoal manufacturing project at the Mevang plant, a project it would like to expand to its other operations. Also, Note 5.2/14 is open for auditors to check that the marketing of the harvested products encourage the optimal use and local processing of all forest products during the next audit.

**Stakeholder comment:**
A stakeholder reported that a significant proportion of usable logs’ sections were left in the timber yards.

**RA response:**
Rougier Gabon only does cross-cutting in the timber yard and no cross-cutting at the strain. This method implies that there is more abandoned wood in the timber yard. However, the auditors did not have the opportunity to verify the conformance of crop residues during this audit. Note 5.2/14 is open for auditors to check that the amount of abandoned logs in timber yards meets the requirements of the standard.

**Stakeholder comment:**
Representatives of several local villages have said there was almost no benefits to communities when Rougier Gabon harvests timber on their land. Villagers say to agree upon the exercise of social mapping, and then see the logging trucks out of the forest, and find themselves after a year or two of logging with projects funded through these crops, which remain unfinished or are failing.

**RA response:**
The auditors found that local employment was favored. However, auditors find the failure of a large proportion of the projects funded by the financial contribution from the sale of timber, as required by Article 251 of the Forest Code. The lack of support and monitoring of projects funded is the cause of most failures and represents a gap in Rougier Gabon’s contribution approach to the local economy. This is a major non-conformity and NCR 03/14 is issued.

**Stakeholder comment:**
A stakeholder mentioned that Rougier Gabon helps to control illegal activities by supporting the patrols of the Ministère des Eaux et Forêts in the CFADs, but that these patrols were not well structured, were improvised and that their activities were not carried out transparently. It was also mentioned that this funding would represent a conflict of interest because the department receives that money from Rougier while it must also verify the conformance of the company’s forestry activities.

**RA response:**
The auditors found that the control of illegal activities was indeed not in conformance with the FSC standard, and is the subject of major NCR 01/14. In terms of potential conflict of interest between Rougier and the ministry, it is not an element of the FSC standard. The auditors note that it is normal that forestry companies pay the State for certain services. Inspection by the Ministère des Eaux et Forêts are
infrequent due to lack of capacity, for all forest companies.

**Stakeholder comment:**
Stakeholders reported that there has been a case of elephant poaching involving Rougier Gabon staff in the Ivindo CFAD area.

**RA response:**
The auditor has audited the company's shares in connection with this case of poaching. Disciplinary actions in accordance with the company's bylaws were taken against two employees of Rougier Gabon known to have been involved in this case. An employee was dismissed permanently and the other was suspended without pay for a period of eight days since his voluntary involvement in wrongdoing has not been demonstrated. However, during the audit, the auditors found that the supervision of forest workers as provided by company procedures remained deficient. Internal procedures and agreements with the authorities to control the hunting activities within the territory (access control, patrolling, awareness of local communities, etc.) are not implemented. The result is that the control of the collection and hunting are inadequate, it is a factor which caused the issuance of major NCR 01/14 and 09/14.

**Stakeholder comment:**
One interested party indicated that the rare species were poorly protected and that there was a lack of awareness of local communities.

**RA response:**
The audit team found several shortcomings in the implementation of procedures designed to protect the certified territories from illegal activities, including the hunting of endangered species. See answer above. These shortcomings have led to the issuance of major NCR 01/14 and 10/14.

**Stakeholder comment:**
A stakeholder said the barriers set up at the entrances of the CFADs were not effective because people pass on motorcycle.

**RA response:**
Access roads of three of the four CFADs were checked as part of the audit. In one case there was no barrier and therefore no control of the road access. All other access visited were equipped with barriers, but they are only monitored during working hours and when they lead to areas where there is exploitation. By visiting the barriers, auditors find that they are actually easy to cross by motorcycle. Controlling access to the territory is also an element that led to the issuance of the NCR 01/14 and 10/14.

### Pesticide Use

<table>
<thead>
<tr>
<th></th>
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<th>NO</th>
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<tbody>
<tr>
<td>FME does not use pesticides.</td>
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<tr>
<td>FSC highly hazardous pesticides used in last calendar year</td>
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<tr>
<td>Name</td>
<td>Quantity</td>
<td># of Hectares Treated</td>
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<tr>
<td>ProtegrumelH2</td>
<td>500 litres in 2014</td>
<td>ha</td>
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<tr>
<td></td>
<td>1050 litres in 2015</td>
<td>ha</td>
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</table>

#### 2.2. Excision of areas from the scope of certificate

☐ Not applicable. Check this box if the FME has not excised areas from the FMU(s) included in the
certificate scope as defined by FSC-POL-20-003. (delete the rows below if not applicable)

☐ The FME has excised areas from FMU(s) included in the scope of the certificate since the last assessment/audit? If yes complete sections A, B and C below

☒ The FME excised areas from FMU(s) included in the scope of the certificate prior to the last assessment/audit, and conformance with FSC-POL20-003 was evaluated? If yes complete sections B and C below.

A. Rationale for excision of area from FMU(s) included in scope of evaluation:

Note: Rationale shall be consistent with one of the permitted conditions specified in FSC-POL-20-003, under which such certifications may be permitted.

Finding:

→ The areas were excluded during a past annual audit, for the certificate issued by the previous registrar. The exclusion does not have to be justified again but Rainforest Alliance still resumes here the verification of conformance with FSC-POL-20-003 of this exclusion.

→ Three mapped and clearly marked areas are excluded from the certificate. Two sites (73 ha and 141 ha in the Léké CFAD) are subject to extraction work and rock crushing in quarries. The other area is a gold mine (1,873 ha in the Moyabi CFAD). These operations are carried out by independent companies of Rougier Gabon who received operating permits from the Gabonese government. The certificate holder has no control over the activities of these companies.

→ The mines are inactive today, however, during their exclusion in 2008 the Rougier Gabon staff had visited the sites and noted some damage to the environment. Evidence of such damage have been preserved. At the time Rougier Gabon had meetings with the quarry operators to educate and encourage them to improve their practices. Inactive sites have been restored and could be operated again in the future.

→ The gold mine is still active. In 2012, an agreement between the operator of the mine and Rougier Gabon was signed which outlines the environmental and social responsibilities of mining activities so that it does not impede the achievement of the certification requirements in the CFAD. The excluded area touches the mine itself and its surroundings where there is deforestation and where operations have impacts that cannot be controlled by Rougier Gabon.

B. Summary of conformance evaluation against requirements of FSC-POL-20-003

Finding:

→ Rougier has submitted an argument for each excluded sector that covers the requirements of the section “2.2 Excision of areas from scope of certification” of the FSC-POL-20-003 exclusion policy. The auditors reviewed and evaluated these documents.

→ During the current audit, the auditors evaluated Rougier’s argument, particularly with regard to the assessment of the impacts of mining as this is the only site that is still operated and thus the risk of environment damage remains real. The auditors concluded that the proposed exclusions are fully justified, as the potential impacts have been identified and that Rougier Gabon by its agreement with the operator of the mine has taken all possible measures to mitigate these impacts.

C. Control measures to prevent contamination of certified wood with wood from excluded/excised forest areas.

Finding:

→ No forest harvesting had been made in the CFAD areas which are excluded from the certificate since the issuance of the certificate in 2013. No harvest is scheduled in the future.
2.3. Conformance with applicable nonconformity reports

The section below describes the activities of the certificate holder to address each applicable non-conformity report (NCR) issued during previous evaluations. For each NCR a finding is presented along with a description of its current status using the following categories. Failure to meet NCRs will result in non-conformances being upgraded from minor to major status with conformance required within 3 months with risk of suspension or termination of the Rainforest Alliance certificate if Major NCRs are not met. The following classification is used to indicate the status of the NCR:

<table>
<thead>
<tr>
<th>Status Categories</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Closed</td>
<td>Operation has successfully met the NCR.</td>
</tr>
<tr>
<td>Open</td>
<td>Operation has either not met or has partially met the NCR.</td>
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<table>
<thead>
<tr>
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<th>Classification of NC :</th>
<th>Major</th>
<th>Minor X</th>
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<tbody>
<tr>
<td>01/13</td>
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- **Standard & indicator:** FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 1.1.5
- **Report section:** Appendix II

**Description of Nonconformance and Related Evidence:**

**Requirement:**
All applicable legal and administrative requirements shall be applied by the forest manager.

**Finding:**
All applicable legal and administrative requirements are implemented by Rougier Gabon. However, interviews and visits conducted in the field have identified irregularities on the marking of logs. The auditors noted the presence of abandoned logs and wood shorts bearing no number in forest parks (Moyabi CFAD) and in the Ivindo sawmill park.

**Evidence:**
- Observations made in the forest parks and plant during the audit.

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

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

**Evidence provided by organization:**
- Working Instruction No. INST OP CONT 0013 / v1 09/12/2013
- General memorandum No. 054 of 26/12/2013
- Control sheet of log yard preparation

**Finding after reviewing evidence:**
Rougier Gabon has set up a work instruction No. INST OP CONT 0013 / v1 of 09/12/2013 for the control of the preparation of logs within the forest park. In the same vein, the preparation of checking slips of the log yards have been instituted with a systematic verification of all markings to do on a log prior to discharge. To complete the monitoring of log markings, general service note No. 054 of 12/26/2013 was developed to clarify that the premium production allocation (base and method of calculation) to the park preparation teams is related to the compliance with log marking guidelines.
In addition, during field visits, the auditors did not find any unmarked...
abandoned logs in old parks or in the yards of the plants.

<table>
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<tr>
<td>Report section:</td>
<td>Appendix II</td>
<td></td>
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</tbody>
</table>

**Description of Nonconformance and Related Evidence:**

**Requirement:**
The forest manager shall demonstrate that they have effective procedures in place to ensure that contractors and others responsible for forestry operations on the property comply with applicable legal requirements.

**Finding:**
The HSE (Health, Safety and Environment) regularly educates staff and subcontractors on environmentally responsible waste management. In addition, contractors are required to sign an FSC charter and respect the Rougier Gabon waste management policy. However, the auditors noted that there are no procedures outlining provisions to ensure that subcontractors operating on the concession comply with all applicable legal requirements. There is also no monitoring by Rougier Gabon related to compliance with FSC regulation and charter by the subcontractors.

**Evidence:**
- Rougier Gabon procedures
- Subcontractor personnel interviews

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

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

**Evidence provided by organization:**
- Subcontractors’ contracts signed in August 2014.
- Training evidence/awareness of October 31, 2014 for GTN carriers, Global Transport and CNT on environmental, regulatory and safety aspects.
- SYS 027 procedure to ensure compliance with legal requirements to subcontractors working on the CFAD, which includes carriers control sheet which is filled out by a Rougier staff member in Libreville and Booué.
- Control sheet filled out November 5, 2014.

**Finding after reviewing evidence:**
The auditors found that Rougier Gabon had developed a procedure to ensure that subcontractors’ carriers comply with all legal requirements. PROC SYS 027 procedure includes a comprehensive list of all the administrative documents representing the legal requirement that contractors must send Rougier to demonstrate their legality. This includes documents such as transport license, proof of insurance, contribution receipts, tax certificate, etc.

The procedure requires the demonstration by the contractor that his staff has been trained. The auditors also found that training was conducted October 31, 2014 on environmental aspects, regulatory and safety aspects.
Finally, the procedure provides for the implementation of a monthly check by Rougier, a checklist covering the regulatory requirements in terms of documentation, safety equipment and the presence of absorbent material for spills.

The auditors consulted signed contracts, training records given by Rougier to subcontractors with signature of participants, as well as the checklists of three controls in compliance with the regulatory requirements carried out by Rougier on trucks of the Global Transport subcontractor. It is expected that the action plan be prepared and by Rougier and submitted to the subcontractors as discrepancies come to light.

The auditors find that Rougier Gabon fully meets the requirements of the indicator. This NCR is closed.

<table>
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<th>NCR Status:</th>
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<table>
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<td>FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 1.6.3</td>
</tr>
<tr>
<td>Report section:</td>
<td>Appendix II</td>
</tr>
</tbody>
</table>

**Description of Nonconformance and Related Evidence:**

**Requirement:**

Subcontractors [...] should be sensitized on the requirements of this standard and of the long term consequences to forest management.

**Finding:**

The auditors’ stop at the Biboulou yard enabled the finding of deficiencies on the part of the Global Transport subcontractor in the knowledge or application of the security requirements (aid kits or missing fire extinguishers, missing absorbent paper, signs of soil contamination around the temporary installation of the fuel tank).

Since the field audit, Rougier undertook awareness and commitment initiatives of its subcontractors (see finding of non-conformance 117, or NCR 04/12). In terms of spills, the new commitment letter only asks to minimize as much as possible the impact on the environment. This does not ensure that the contractor knows, for example, sound practices in the handling of hazardous materials in order to prevent or contain spills.

**Evidence:**

- Field visit of the Biboulou yard
- New commitment letter from subcontractors.

**Corrective action request:**

Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

**Timeline for conformance:**

By the next annual audit

**Evidence provided by organization:**

- Subcontractors’ contracts signed in August 2014.
### Found after reviewing evidence:

- **Global Transport and CNT on environmental, regulatory and safety aspects.**
  - SYS 027 procedure aiming to ensure compliance with legal requirements to subcontractors working on the CFAD, which includes carriers’ control sheet which is filled out by a Rougier staff member in Libreville and Booué.
  - Control sheet filled out November 5, 2014.
  - Interviews with logging trucks drivers.

The auditors found that Rougier Gabon has developed a procedure to ensure that subcontracting carriers comply with all legal requirements. PROC SYS 027 procedure dated October 31, 2014 includes a comprehensive list of all the administrative documents representing the legal requirement that contractors must send Rougier to demonstrate their legality. These include documents such as transport license, proof of insurance, contribution receipts, tax certificate, etc.

The procedure also requires the demonstration by the contractor that his staff has been trained. The auditors also found that training was conducted for the directors of transport companies on October 31, 2014 on environmental, regulatory and safety aspects. Rougier has not directly trained workers of transport companies and counts on managers in turn to train them. The auditors note that at the time of the audit (two weeks after the directors’ training), the guidelines and trainings have not yet been communicated to all employees of transport companies. The auditors did not find absorbent paper in the three logging trucks sampled in Booué but fire extinguishers and first aid kits were present. However, the auditors find that the workers have received training in the past and that the problem of the lack of absorbent paper is because the transmission of guidelines to the employees of transport companies is still ongoing.

Finally, the procedure provides for the implementation of a monthly check by Rougier, a checklist covering the regulatory requirements in terms of documentation, safety equipment and the presence of absorbent material for spills.

The auditors consulted signed contracts, training records given by Rougier to subcontractors with signature of participants, as well as the checklists of three controls in compliance with the regulatory requirements carried out by Rougier on trucks of the Global Transport subcontractor. It is expected that the action plan be prepared and by Rougier and submitted to the subcontractors as discrepancies come to light.

The auditors find that Rougier Gabon fully meets the requirements of the indicator. This NCR is closed.

### NCR Status:

CLOSING

### Comments (optional):

- **NCR #** 05/13
- **Classification of NC**: Major
- **Minor X**
- **Standard & indicator**: FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 2.1.6
<table>
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<tr>
<th>Report section:</th>
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<tbody>
<tr>
<td><strong>Description of Nonconformance and Related Evidence:</strong></td>
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<tr>
<td><strong>Requirement:</strong></td>
<td>The forest manager shall produce and implement a policy on compliance with legal or customary tenure or use rights for each community and present it to all his or her employees and their families, and make it available to customers and the public.</td>
</tr>
<tr>
<td><strong>Finding:</strong></td>
<td>Through the exercise of participatory social mapping, Rougier operationalizes its social policy in favor of local communities. However, the reference document is entitled “Document de stratégie de politique sociale de Rougier Gabon en faveur des communautés locales.” It is therefore not an official policy, endorsed by management, which is subject to presentation to workers and their families as well as customers and the public.</td>
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<tr>
<td><strong>Evidence:</strong></td>
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<tr>
<td>– Document de stratégie de politique sociale de Rougier Gabon en faveur des communautés locales</td>
<td>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.</td>
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<tr>
<td>– Interviews with Rougier staff</td>
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<td><strong>Corrective action request:</strong></td>
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<td><strong>Timeline for conformance:</strong></td>
<td>By the next annual audit</td>
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<tr>
<td><strong>Evidence provided by organization:</strong></td>
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<tr>
<td>• Document “Déclaration de politique sociale en faveur des populations locales et autochtones”</td>
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<tr>
<td>• Meeting minutes of October 21, 2014 in the village of Akieni</td>
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<tr>
<td>• Minutes of awareness meetings with Booué workers.</td>
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<tr>
<td><strong>Finding after reviewing evidence:</strong></td>
<td>Rougier Gabon presented to auditors the “Déclaration de politique sociale en faveur des populations locales et autochtones”, endorsed by the management of Rougier Gabon on October 9, 2014. This policy was presented to Booué workers, as demonstrated in the minutes of the awareness meeting held. At the time of the audit, the awareness to this policy were scheduled in Babylon, Mikongo, Mevang and Franceville before the end of 2014.</td>
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<td>The auditors find that Rougier has made its employees aware of this social policy, and that it applies it in the implementation of its social mapping and supporting community development. This NCR can be closed.</td>
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<td><strong>NCR Status:</strong></td>
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<tr>
<td><strong>Comments (optional):</strong></td>
<td>Like many other local communities of Rougier Gabon concessions, the indigenous and Bantu communities in the Akiéni region and local officials were aware of this policy (event of October, 21 2014), as demonstrated by the PV consulted by auditors. It is obviously desirable that the indigenous people are aware of policies affecting them adopted by Rougier. However, this is not the place to “raise awareness” among indigenous people with respect for their rights, since they are not the ones who may suffer a negative impact.</td>
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<td>NCR #</td>
<td>06/13</td>
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<tr>
<td>Standard &amp; indicator:</td>
<td>FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 2.3.5</td>
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**Description of Nonconformance and Related Evidence:**

**Requirement:**
Adjacent communities acknowledge having been informed beforehand of all procedures to resolve conflict relating to the exercise of their use rights before freely giving their consent and are be capable of describing such procedures.

**Finding:**
The unanimous recognition of such procedures is difficult in communities where cohesion is not obvious, as described by sociological studies (e.g. Feasibility study of community forests in Gabon). If in more than two thirds of the villages encountered, the riparian communities acknowledge having been informed about the procedures and their use rights, in the others part of national (some urban elites) villages was not associated to meetings and have not given their consent. A part of these communities has therefore not been informed of the conflict resolution process, which can be explained by the lack of a comprehensive identification of resource persons and senior village staff.

The non-conformance is minor because the issue affects only a portion of some communities.

**Evidence:**
- Interviews in Obori-Lékoussa, Djoutou and Mbadi villages;
- Documentation of the implementation of the Djoutou community project.

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

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

**Evidence provided by organization:**
- Lists of expatriate elites of the local Ogooué-Ivindo and Upper Abanga villages

**Finding after reviewing evidence:**
The auditors met in their homes villagers from 11 local villages of Moyabi, Léké and Ogooué-Ivindo CFADs. Rougier Gabon’s records show that multiple Rougier updated procedures and policies have been presented and left in multiple paper copies during a recent tour (October 2014) of Rougier Gabon’s social staff in villages. The elites and other expatriates villages will have access to these procedures left behind:
- Identification and conflict management procedures affecting forest harvesting operations;
- Hydrocarbon pollution prevention policy;
- Statement of responsible forest management policy;
- Youth recruitment policy;
- Management plan summary;
- Management plan procurement procedure;
- CFAD map;
- Social policy statement in support of local and indigenous populations.

These updates on policies and procedures are presented all at once during an awareness event in each village. The auditors found that the
villagers are not able to describe the procedures that have been presented to them, probably because it’s a lot to remember for a single awareness, and because they have no practical use in the daily life of the villagers. However, auditors recognize that the efforts of Rougier Gabon to meet the requirements of indicator 2.3.5 are substantial and show a lot of good intentions. The procedure for the identification and management of conflicts affected by this NCR, simply states for their part, the villagers have to send their complaints orally or in writing to a social supervisor of Rougier Gabon, so that their relevance may be evaluated by the head of Sustainable Development. The rest of the procedure then follows its course. Without being able to describe the procedure, the villagers, questioned on what they would do if a conflict about their right of use occurs, correctly identified the fact that they would talk to the social supervisor of Rougier Gabon. The objective of this criterion is reached and this NCR may be closed.

The auditors noted the existence of a conflict listed by Rougier and not resolved, involving an issue on the right of use (forest access). This issue is treated in NCR 02/14.

**NCR Status:** CLOSED

**Classification of NC:**

- **Major**
- **Minor X**

**Standard & indicator:** FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 2.3.7

**Report section:** Appendix II

**Description of Nonconformance and Related Evidence:**

**Requirement:**

Dispute resolution procedures shall contain provisions stipulating that in the event a dispute should arise relating to the tenure or use rights of adjacent communities, the forest operations that are the direct cause of the dispute shall be delayed or suspended until said dispute has been resolved.

**Finding:**

The conflict management process is the PROC SYS 024. Nothing in this procedure provides that in case of any conflict over land ownership and use rights of surrounding communities, forest operations that are the direct cause of the conflict can be delayed or suspended pending resolution of the conflict.

The non-conformance is minor because Rougier works upstream of such conflicts to predict them through participatory social mapping, and can occasionally, in conflict prevention, without stopping the operation move on other operating plots, the time to address a problem or to ensure that the roads’ passages or other activities that may have negative impacts on use rights of the population or their cultural and sacred interests on certain sites have been seen with the villagers.

**Evidence:**

- Procedure for identification and management of conflicts, PROC SYS 024

**Corrective action request:** Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

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

**Evidence provided by organization:**

- Revised procedure for the identification and management of conflicts, PROC SYS 024, dated October 8, 2014.
Finding after reviewing evidence: | The revised procedure provides that in case of conflict, the forestry operations that are the direct cause of this conflict may be delayed or suspended pending conflict resolution. This NCR may be closed.

NCR Status: | CLOSED

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**Description of Nonconformance and Related Evidence:**

**Requirement:**

Indicator 3.1.1 requires that the indigenous pygmy peoples who enjoy customary and legal rights in the FMU be located, identified and registered

Indicator 3.1.2 requires that the concerns and interests, legal and customary rights of indigenous pygmy peoples inside the FMU be identified in a participative manner, documented and taken into account in the management plan.

**Finding:**

Socio-economic studies were conducted before or after the FMU operation process where Indigenous Peoples are located. These studies carried out by the committee or the service of socio-economic studies, locates Indigenous Peoples using participatory mapping, identifies and counts them (exhaustive census).

However, these pieces of information from 2007 for Léké and 2008 for Moyabi, being six and five years ago. This information requires an update to ensure that, at all times, it is not located in an area of interest for a population that has traditionally been mobile. If the Pygmies often practice hunting expeditions over long distances, an update of the 2007 and 2008 studies and a new participatory social mapping are then necessary to know for certain the nature and location of rights, interests and activities in the audited forests.

**Evidence:**

- Interviews with Rougier Gabon
- Documentation provided by Rougier Gabon (management plans and sociological studies)

**Corrective action request:**

Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

**Timeline for conformance:**

By the next annual audit

**Evidence provided by organization:**

- Maps of lands, landmarks and resources of Boumango and Kassiélé (and others but the land is outside the CFAD);
- Memoranda of Understanding on participatory methods of managing sites identified by social mapping with Kassiéné and Boumango;
- Meeting between auditors and the Aboriginal Kassiéné community.

**Finding after reviewing evidence:**

Rougier Gabon has implemented from beginning to end its participatory social mapping procedure, including signing agreements and the "rituel de la fête de la forêt" (celebration of the forest ritual) in the Kassiéné Aboriginal communities (Léké CFAD) and Moyabi (Boumango). These activities and the maps and agreements that result from it entirely meet the requirements of both indicators. This NCR may be closed.

**NCR Status:** | CLOSED
### NCR # 09/13

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**Description of Nonconformance and Related Evidence:**

**Requirement:**
The indicator requests that the indigenous pygmy peoples should indicate formally, clearly and unequivocally in writing or by means of traditional methods that their legal and customary rights relating to their lands and resources are recognized and observed.

**Finding:**
Several documents were made available to the auditors. But none present a written confirmation by Aboriginal peoples attesting the forester’s compliance of their rights. Currently, the FMUs where these populations were located are not operating. Although not yet exploited, under the provisions of Article 251 for FMUs where indigenous peoples live, the operator should already have a document confirming the compliance of the rights of Pygmies.

**Evidence:**
- Interviews with Rougier Gabon
- Documentation provided by Rougier Gabon (management plans and related documents)

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

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

**Evidence provided by organization:**
- Maps of lands, landmarks and resources of Boumango and Kassiéié (and others but the land is outside the CFAD);
- Memoranda of Understanding on participatory methods of managing sites identified by social mapping with Kassiéié and Boumango;
- Meeting between auditors and the Aboriginal Kassiéié community.

**Finding after reviewing evidence:**
Rougier Gabon has implemented from beginning to end its participatory social mapping procedure, including signing agreements and the "rituel de la fête de la forêt" (celebration of the forest ritual) in the Kassiéié Aboriginal communities (Léké CFAD) and Moyabi (Boumango). Through these activities, maps and agreements, Kassiéié and Boumango indigenous people indicate that their legal and customary rights relating to their lands and resources are recognized and respected. The operations in the two targeted FMUs are not planned for several years. This NCR may be closed.

**NCR Status:** CLOSED

### NCR # 10/13

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<td>FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 3.3.4</td>
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**Description of Nonconformance and Related Evidence:**
**Requirement:**
The indicator requests that in collaboration with the indigenous pygmy peoples, the forest manager shall raise awareness among and inform other communities of the indigenous pygmy peoples’ rights.

**Finding:**
Rougier holds a copy of the United Nations Declaration on the Rights of Indigenous Peoples (which Gabon is a signatory). In its application of participatory social mapping and respect for rights of local communities (regardless of ethnicity), Rougier does not contravene this statement.

Moreover, according to Leonardo Odambo, head of the Gabonese organization of indigenous peoples, MINAPYGA “the participatory mapping is used to help indigenous peoples to produce a demonstration of their traditional lands and resources in order to effectively initiate a debate about how forests should be managed.”

However, indicator 3.3.4 does not ask to apply these rights but to educate non-pygmies on the rights of pygmies. The application of this indicator, which seeks to develop an ethnic identity in a context of assimilation where members of this ethnic group cannot claim in themselves, can be tricky. However, given the existence of organizations like MINAPYGA, Edzendgui or the Association for the development of the culture of the Pygmies of Gabon, it remains to Rougier to demonstrate that it had examined with such organizations the possibility to highlight, with other communities, the rights of Pygmy communities affected by its CFADs.

**Evidence:**
- Interviews with Rougier staff.

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

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

**Evidence provided by organization:**
- Reports of international conventions and declarations relating to indigenous peoples
- PV meetings in several Bantu villages.

**Finding after reviewing evidence:**
The auditors found that Rougier Gabon had prepared a “Collection of international conventions and declarations relating to indigenous peoples.” These documents and their significance were presented orally by the Rougier Gabon social team in the local villages where there is the presence of indigenous communities in the vicinity (ObouObyia andLenka near Kassiélé and Bafoumou 1, 2, and 3 close to MoyabiMopata). Indigenous communities such as Kassiélé and MoyabiMopata have also received such awareness on their own rights. This same awareness was given to the authorities (prefecture, county council and the mayor and the confinement of water and forest).

This is in conformance with the requirement of the NCR and the indicator.

**NCR Status:**
CLOSED

**Classification of NC:**
Major
Minor X

**Standard & indicator:**
FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 4.1.2
Description of Nonconformance and Related Evidence:

**Requirement:**
The standards requests that the forest manager implements a recruitment and training policy that gives priority to young people from the populations within the FMU or neighbouring areas.

**Finding:**
Rougier Gabon has no specific policy for the recruitment and training of young local people.

**Evidence:**
- Interviews with Rougier Gabon staff
- Recruitment Sheet

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

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

**Evidence provided by organization:**
- “Young” policy in relation to the local and indigenous populations of CFADs and of industrial sites of October 9, 2014.
- Interviews with human resources’ representatives within the Rougier Gabon sites.

**Finding after reviewing evidence:**
The documentary review allowed the auditors to notice that Rougier Gabon has implemented a “Youth” policy in relation to the local and indigenous populations of Rougier Gabon sites. This policy stipulates in the third point that “with equal skills, youths of local villages of Rougier Gabon CFADs are recruited first. Through its “Youth” policy Rougier Gabon is committed to recruiting and training young people under 30 years of age in the local villages under the supervision of a tutor, through vacation, academic or professional work experiences. Rougier is also involved in this policy to send job offers for display and distribution to local and indigenous populations.

The documentary review (payslips and hiring sheets) and interviews with the human resources’ representatives in the Rougier Gabon sites show that the Rougier Gabon “Youth” policy is being implemented. The auditors actually observed that the job offers had been distributed in CFAD local villages of FMU 3 of UFA 3 of the Ogooué-Ivindo, in preparation for operations which are beginning there in a few months. This NCR may be closed

**NCR Status:**
CLOSED

**Comments (optional):**

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**Classification of NC :** Major

**Standard & indicator:** FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 4.2.2

**Report section:** Appendix II

**Description of Nonconformance and Related Evidence:**

**Requirement:**
Indicator 4.2.2 requires that the condition of employees’ and their families’ health be compliant with the applicable regulations of the legislation in force. The forest manager should undertake measures to
ensure adequate public health and safety conditions (potable water, lavatories, buckets, etc.).

**Finding:**
Side Booué, Rougier rents boxes SETRAG. Although the company has already made efforts to put these boxes level, additional efforts are required. The auditors found deficiencies in relation to the electrical distribution, water distribution, sewer or garbage collection (the site is littered with waste, rusty metal objects including children play). The auditors acknowledge that the case is unique in that Rougier rents boxes in a neighborhood in a context where housing can be scarce and the provision of these services is outside its control. However, society has a duty to provide minimum sanitary conditions for its employees, regardless of how they choose to house (Basic Life vs. similar neighborhood).
The boxes are not screened or any preventive system, while malaria is the leading cause of death in Canada.

**Evidence:**
- Visit the SETRAG district and some huts
- Interview with Rougier staff and workers

**Corrective action request:**
Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

**Timeline for conformance:**
Six months after report closure

**Evidence provided by organization:**
- 6 months after report closure in April 2014, Rougier Gabon has provided Rainforest Alliance with a list of actions undertaken with SETRAG to resolve the non-conformance;
- At the ongoing annual audit, the auditors visited the camp and interviewed workers and their families.

**Finding after reviewing evidence:**
The finding leading to the closure of the NCR was conducted in two stages. First, during the annual audit of November 9 to 15, where the finding was that the NCR could not be closed and it was upgraded to major. Immediately after the audit, during the drafting of the report by the auditors, Rougier has implemented significant corrective actions. Rainforest Alliance has agreed to make a second visit to the non-conforming camp on December 5th to determine the state of the situation.
The finding presented below therefore states the two observations:

**Initial finding of November 9-15:**
The visit to the camp during the ongoing annual audit allowed auditors to notice that several mosquito nets were distributed and used by workers and their families. The auditors also found that all families now have permanent electricity, and a tank of drinking water was purchased and installed with a booster pump to distribute water to the last huts at the end of the camp. However:
- The pump stopped working three months ago and algae cover the bottom of the tank. The water therein is not chlorinated. Residents near the tank continue to use the water from the tap installed on the side, but this one is in a depression filled with rainwater, that is why the valve is at water level. Residents who want to use this water must be considerably wet and containers to be filled may be contaminated by the water from the depression;
- Many families also have running water all the time, but others only intermittently, and others not at all. Old oil barrels are used to store rainwater. This water is mainly used for toilets and to wash the floor, but some families use it to wash the dishes and others,
further away from public taps, drink rain water accumulated in oil drums;
- The infirmary is without water. Despite a request made six months ago, the two examination rooms lack any equipment (bed, chair, table) and there are no tools for infusions;
- The waste is accumulated in a pile on the ground all around the camp. Some workers complain of odors and insects, and manage the problem themselves by regularly throwing gasoline to burn them;
- All families have not yet received mosquito nets. This is problematic because the Rougier camp nurse confirmed that malaria is common in the community.

The auditors find that the problems initially identified at camp Booué are not resolved. This non-conformance remains open and is upgraded to major.

Findings of December 5:
The auditor has identified a sample of sites and huts to visit for verification on the basis of the map (ground plan) prepared to present the breakdown of the field camp. Thus the infirmary, all garbage bins and 11 out of 30 huts were visited.

Following this visit, the following observations were made:

SETRAG camp:
- setting up 10 household waste collection points
- awareness of households on the new household waste management rules
- distribution of garbage bags for waste collection in households
- signing a contract for waste collection in the SETRAG city of Booué with the THEO SHOPPING company who is responsible to make one transition per day to collect waste from Monday to Friday. The implementation of this contract is effective because the auditor found that the camp was clean, rid of all dunghills that cluttered it during the past auditors’ visit.

Infirmary:
- sterilization tray endowment
- establishment of a 50 liters drum of drinking water per day
- establishment of a medical waste conservation bin
- installing and equipping two examination rooms with 2 gallows and 2 beds with mosquito nets.

Huts visited:
- in all huts visited, housekeepers have reported receiving a 50 liters drinking water drum for unmarried workers and 100 liters for married workers. Every morning, the distribution service established passes in each hut to fill up drinking water drums. The water drawn from the national distribution network and consumed by the inhabitants of the Booué city is treated with the “Micropur” powder in 1000 liters’ casks used for refueling huts. The roadman responsible for monitoring water potability of the Camp was trained on the use and dosage of the product during water treatment. During the visit of the huts and the infirmary, the
The auditor was able to realize the effectiveness of the measure with the full drums in all visited huts. The housekeepers said they never had a rupture of drinking water since the launch of the drinking water distribution of November 29, 2014.

- All households report having an increase in mosquito nets and in sufficient quantity for all rooms. The mosquito nets’ discharge sheets were presented at the office documentary review.

The auditors find that the health conditions of employees and their families now meet the standards referred to in the legislation. The forest manager has taken the necessary measures to ensure hygienic conditions and adequate public health (drinking water, latrines, garbage etc.). This NCR may be closed.

NCR Status: CLOSED

Comments (optional):

NCR # 13/13 Classification of NC : Major Minor X

Standard & indicator: FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 4.2.6

Report section: Appendix II

Description of Nonconformance and Related Evidence:

Requirement:
The indicator requires that the risk assessment and the statistics’ analysis on work-related accident are available and updated.

Finding:
The evaluation of SST (occupational health and safety) prevention measures and types of required medical examination does not address all the relevant elements for each position or for remote sites (saw dust, malaria).

Some HSE officials have no training in this area and had to learn their trade on the job. If this has advantages, such training requires the support of skilled people by the time the new staff is up to level. The flaw found here compared to the indicator is that those responsible do not always have all the necessary skills to identify risks associated with work. There is room for a more comprehensive assessment of the hazards and inherent risks with different working risks with the assistance of an occupational doctor.

Evidence:
- Interviews with Rougier staff and workers

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

Timeline for conformance: By the next annual audit

Evidence provided by organization:
- Occupational risk assessment methodology document for Rougier Gabon forest stations
- Summary table of occupational risk assessment results
- Interviews with Rougier Gabon occupational doctor, HSE official and the Health and Safety Officer

Finding after reviewing evidence: Rougier Gabon, in collaboration with its company doctor, has carried out a risk assessment of workplace accidents study in its different sites. A total of 98 forest stations were reviewed and additional measures to
mitigate identified risks were recommended. The implementation of these measures was underway during the audit.

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**Description of Nonconformance and Related Evidence:**

**Requirement:**
Indicator 5.3.8 requires that timber harvesting operations be carried out in strict compliance with this mapping.

**Finding:**
The boundaries of AAC (allowable annual cut), protected areas, logging roads and timber yards are respected as designated on the maps in the majority of cases. The field visits have identified some parks provided during the planning of operations was not open; this caused the log storage along logging roads (Babylon site). This practice does not comply with the operational techniques that require open parks suitable for stacking and storing logs.

**Evidence:**
- Operating maps and skid trails
- Forest timber yards
- Site personnel interviews.

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

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

**Evidence provided by organization:**
- *Procedure planification préparation parcs forêt v1*
- *carte parcs-suivi-évaluation*
- Instructions on the construction of timber yards
- Site visit operation CFAD Moyabi (AAC 2014)

**Finding after reviewing evidence:**
Rougier Gabon has implemented a procedure for the planning and preparation of timber yards; a work instruction was also given for the construction of parks, identification and use of parks as well as the provisions relating to respect for the environment. A visit to the logging site was verified that the parks provided in the planning are actually open on the field and are used for storage of logs.

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**Description of Nonconformance and Related Evidence:**

Rainforest Alliance Forest Management Annual Audit Report - this version is a translation. The official version of this report is the French version.
**Requirement:**
The standards require that the management plan and/or supporting documents include a description and a justification of the techniques and operating equipment.

**Finding:**
The management plans include a description and a justification of harvesting techniques in the “Organization for the monitoring and implementation of the management plan” part. This organization is presented in a summary of the commitments made in the CFAD management plans' implementation framework. Among these commitments are quoted: the drafting of updated documents on the operation rules, openness and realization of the CFAD limits and the maintenance of these limits, achieving operation inventories, DME control, respect for controlled logging techniques, marking and mapping of skid trails on the ground, skidding impact reduction on residual stand, soil and waterways, marking and protection of crop trees along the skid trails, tracing secondary roads after the operations’ inventory analysis. All these commitments are divided in procedures. These procedures written for forest activities (tracking, the opening of roads and parks, felling, hauling...) describe the proceeding techniques of these activities. The procedures are divided into work instructions to facilitate the understanding and practice by employees of the operating site.

In regards to the operating equipment adapted to the recommended techniques, the auditors noted that the material used is not always the one provided; (e.g., the crawler tractor used for hauling instead of the tire tractor). It also lacks the description of the driving techniques of handling activities such as logs in forest park and the description of the equipment used.

**Evidence:**
- Rougier Gabon procedures
- Site personnel interviews

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

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

**Evidence provided by organization:**
- PROC OP EXP 024 version 1 (24 octobre 2014) : Règle d'exploitation : Planification et préparation des parcs forêt.
- Gear use and park planning memos

**Finding after reviewing evidence:**
A procedure has been developed that includes a description and a justification of technical and operating equipment to be used during the different operating mechanized activities (road progress and skidding). A presentation of the possible land difficulties was conducted and the proposed solutions have been integrated into the process. The planning process and preparation of forest parks has also been amended to incorporate the equipment to be used.

Rougier was accompanied by a consultant to assist in developing and implementing procedures that meet this requirement. This has produced a mission statement that describes its activities during the stay including its meetings with the operations teams and awareness campaigns that have been conducted. To ensure the implementation of its procedures, memos that include a summary of the proceedings were sent to site managers. The memo “use of gear” clearly indicates which machines are permitted or prohibited for different types of work.
During field visits, the auditors did find a very good control of the impacts on soil and on non-operated rods during operations. The auditors found that there was very little rutting and injury to standing trees. This is a further indication that the machinery is well adapted to operating sites. This demonstrates conformance with the requirement and the NCR can be closed.

**NCR Status:** CLOSED

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**Description of Nonconformance and Related Evidence:**

**Requirement:**
The standard requires that the summary includes a specific section on the presence of high conservation value sites within the FMU, as well as the measures taken to improve or maintain them.

**Finding:**
Rougier Gabon has prepared a summary of the management plan for each CFAD. The auditors noted that the measures taken to improve or maintain HCVF (management measures) do not appear in the summaries of management plans. These summaries only present a HCVF location map in Section 7.

**Evidence:**
- Development Plan Summary
- Interviews with Rougier Gabon personnel

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

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

**Evidence provided by organization:**
- Revised management plans summaries

**Finding after reviewing evidence:**
The organization has provided a revised summary for the management plan for each of the four CFAD. The summary of each of the management plans now include a summary of HCVF and of these management methods. Conformance has been met, this NCR can be closed.

**NCR Status:** CLOSED

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**Description of Nonconformance and Related Evidence:**

**Requirement:**
The standard requires that the procedure for obtaining the summary of the management plan should be defined and known by all stakeholders.
Finding:
The auditors noted that there is no formal procedure and even an approach to obtain summaries of management plans. Moreover, this approach is not known to stakeholders.

Evidence:
- Rougier Gabon procedures
- Interviews with Rougier Gabon staff

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

Timeline for conformance: By the next annual audit

Evidence provided by organization:
- PROC SYS 027 Procedure for obtaining the management plan summary

Finding after reviewing evidence:
The auditors found that Rougier Gabon had developed a simple procedure for obtaining the management plan summary and that it had been distributed to stakeholders, including riparian communities. Rougier Gabon has already sent to all communities a folder containing multiple procedures, policies, as well as a section on HCVFs. This NCR may be closed.

NCR Status: CLOSED

Comments (optional):

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NCR # 18/13 Classification of NC: Major

Standard & indicator: FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 9.2.3

Report section: Appendix II

Description of Nonconformance and Related Evidence:

Requirement:
The standard requires that the assessment procedure and its results, including comments and suggestions by stakeholders during consultation, should be fully documented and made public.

Finding:
The results of HCVF assessments are documented (map of constraints). The maps are published. However, the results for HCVs 5 and 6 are only reported in restricted meetings with the authorities and some representatives of the village but are not made public.

Evidence:
- Maps of constraints
- Interviews with Rougier Gabon staff and villagers.

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

Timeline for conformance: By the next annual audit

Evidence provided by organization:
- Résumé public du rapport de suivi 2013 HA
  - Résumé public du rapport de suivi 2013 HO
Finding after reviewing evidence:
Rougier Gabon presented the public summaries of the 2013 monitoring reports for the Haut-Abanga, Ogooué-Ivindo and Haut-Ogooué. These reports present the evolution of conservation areas set in all three zones for all categories of HVCs (1 to 6). Agropastoral series, sacred sites, rivers and wetlands shores, hunting sites, NTFP harvesting, etc. are presented. During visits to local villages, the auditors found that these monitoring summaries were distributed to the villagers. Furthermore, these summaries are available on request from the Rougier website. This is in conformance and the NCR can be closed.

NCR Status: CLOSED
Comments (optional): Note that there is no HVC in categories 5 and 6 in Haut-Abanga.

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Description of Nonconformance and Related Evidence:

Requirement:
The standard requires that the stakeholders consulted should have received a copy of the section of the summary of the management plan and/or supporting documents dealing with the management of high conservation values.

Finding:
The development plan summaries are available to the public are displayed at the entrance of each CFAD particularly, but it lacks the section on HVCs.

Evidence:
- Displayed plans.

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

Timeline for conformance:
By the next annual audit

Evidence provided by organization:
- Summary of the revised management plans
- Distribution Procedure of the PA summary
- Interviews with community representatives.
- Interviews with stakeholders involved in the consultations of the HCVF report

Finding after reviewing evidence:
To meet this requirement, Rougier has provided consulted stakeholders with summaries of the management plans that now include a summary of HCVFs and management methods.

A distribution process of the PA summary was also developed which indicates that a copy of the RPA is given to the various villagers monitoring committees during meetings and when there is demand for obtaining the PA it would be documented and a signed receipt would be obtained.

Interviews with communities near CFADs show that they have received
copies of the updated PA summaries and which contain summaries of HCVF. Evidence was provided that the final HCVF reports were submitted in 2011 to those consulted. Before finalizing the audit, the applicant forwarded a copy of the PA summary to such persons or organizations.

NCR Status: CLOSED
Comments (optional):

2.4. New nonconformity reports issued as a result of this audit

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Report section: Appendix IV

Description of Nonconformance and Related Evidence:

Requirement:
Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.

Finding:
Procedures to identify, report and fight against illegal activities exist, but are not implemented. For example, for the main path of the Ivindo CFAD, the barrier has been removed because it had been smashed too many times. In the Léké and Moyabi CFADs, barriers are present, but they can easily be crossed by motorcycles and other small vehicles. In addition, one of the barriers of the main path was smashed shortly before the audit, but repaired when the breakage was found. Barriers to access roads are kept only when forest management activities are ongoing. In the evenings and on weekends there is no supervision. For barriers of access roads that do not lead to operating areas, there is no supervision. In Ivindo, where there are no barriers, there is no supervision.

Unannounced vehicle checks are not carried out in accordance with the procedure. For example, in Ivindo, only one check of two logging trucks was documented in 2014. In addition, in Ivindo, logging trucks from another TBNl company crosses through the CFAD to transport logs from an operation north of the Ivindo CFAD and they have not been subject to any verification. According to interviews, it is not clear to officials that the unannounced verification procedure covers vehicles from other companies using the CFADs.

Measures to find solutions to illegal activities in the CFAD or fight against them is to reach agreements with the MEF and NGOs (WCS and WWF according to the province). Rougier Gabon has agreements with WCS, WWF and the MEF for the completion of missions fighting against illegal activities in the CFAD by personnel of the parties involved. Interviews conducted by auditors show that these agreements are not enforced.

The shortcomings mentioned above occurred in the context of a case of elephant poaching in June 2013 in the region of the Ivindo CFAD. Two Rougier employees were suspected of taking part in the operation (transporting ivory and concealing a weapon).

In summary, the procedures to identify, report, limit and fight against illegal activities within the CFAD exist, but they have not been implemented as they should have since the reassessment audit. The audit team concludes that the current system does not protect CFADs from illicit activities. Major NCR 01/14 is issued.

Evidence:
Field visits during the audit
- Interviews with Rougier Gabon staff
- Interviews with stakeholders.
- Procedures for control of access roads and internal hunting control.
- Bipartite or tripartite agreements for the control of illegal activities on CFADs

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

Timeline for conformance: Within 3 months of report finalization

Evidence provided by organization: PENDING

Finding after reviewing evidence: PENDING

NCR Status: OPEN

Comments (optional):

NCR # 02/14 Classification of NC: Major Minor X

Standard & indicator: FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 2.3.1

Report section: Appendix IV

Description of Nonconformance and Related Evidence:

Requirement:
Indicator 2.3.1 requires that the forest manager should prepare written procedures jointly with the adjacent communities for dealing with potential conflict relating to tenure and use rights on the basis of the legal framework of the country and should assign personnel and resources for the effective implementation of same

Finding:
The auditors find that social workers involved in the implementation of the Rougier Gabon dispute resolution procedure was not trained or did not have clear instructions enabling him to distinguish the complaints, grievances and disputes. One member of the social team of the staff interviewed by the auditors could not describe his own role in the process. Another member of the social staff team has not activated the procedure in a clear case of conflict over the rights to use the Moyabi CFAD. This issue, linked to the forest access, to hunting, fishing and worship for a CFAD local community therefore remains untreated for several months. During a meeting with village representatives, auditors found that the grievance has clearly evolved in conflict. So Rougier Gabon staff has not identified a situation where its own procedure should have been applied (if only to assess whether it is a conflict or not, as provided for the first stage of the procedure). This is among other things due to the fact that the current identification and conflict resolution process is inappropriate to treat a situation that is not the result of non-conformance with Rougier Gabon’s commitments to the affected community. The current conflict is due to the fact that the community is denied access by car to the site of his former forest village, which has nothing to do with forestry operations in progress or commitments taken by Rougier towards the community. Rougier Gabon has its reasons to deny access by car (danger of accident, risk of poaching), and the community has its reasons for the request (exercise its rights of use). This is the typical case in which a conflict resolution process should have started. This is non-conformance and NCR 02/14 is issued. This is a minor non-conformance, as auditors find that among the 11 other sampled communities, there is no dispute over land rights and usage, and therefore there no other event that this procedure should have been applied to. Rougier Gabon has an excellent system of social mapping and materialization on the ground that greatly reduces the risk of conflicts over land tenure and use rights.
Evidence:
- Interviews with the affected community;
- Interviews with Rougier Gabon staff;
- PROC SYS 024 Identification and management of conflicts;
- Gabonese Forestry Code.

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

Timeline for conformance: By the next annual audit

Evidence provided by organization: PENDING
Finding after reviewing evidence: PENDING

NCR Status: OPEN

MAJOR NCR # 03/14 Classification of NC: Major X Minor

Standard & indicator: FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 4.1.7

Report section: Appendix IV

Description of Nonconformance and Related Evidence:

Requirement:
Indicator 4.1.7 requires that the forest manager should contribute to the development of the local economy.

Finding:
There is no doubt that Rougier Gabon contributes to the development of the local economy and has been for decades. With its 1,500 employees, Rougier Gabon is one of the largest employers in the country. In addition, Rougier Gabon funds projects in accordance with Article 251 of the Forest Code up to 60 million FCFA/year.

However, auditors found insufficient involvement of Rougier Gabon in funded projects: a significant lack of monitoring and support for village projects funded by Rougier Gabon results in a high rate of failure, a social climate that festers in some villages, as well as the bitterness and even the suspicion of the villagers towards Rougier Gabon.

Rougier Gabon operates in a particularly difficult climate, with many villages and funded projects, an already weak social cohesion in the villages, a restricted social team and limited resources. Obviously, Rougier Gabon shares the responsibility of funded projects with several other parties, but unfortunately these other entities have minimal capacities and motivation.

In conclusion, the involvement of Rougier Gabon in the coaching and monitoring of village projects is not to the extent of its investments there. Because of this, the financial contributions do not give the expected results, and there is therefore a non-conformance in the process of contributing to the local economy required from Rougier Gabon by the standard. This is a major non-conformance given the problems and tensions caused in many villages because of failures of a large proportion of funded projects.

Evidence:
- Interviews in 12 local villages from three Rougier CFADs;
- Tableau Suivi Projets Article 251.
Corrective action request: Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

Timeline for conformance: Within 3 months of report finalization

Evidence provided by organization: PENDING

Finding after reviewing evidence: PENDING

NCR Status: OPEN

Comments (optional):

NCR # 04/14 Classification of NC: Major Minor X

Standard & indicator: FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 4.2.1

Report section: Appendix IV

Description of Nonconformance and Related Evidence:

The requirement Summary:
Indicator 4.2.1 says that the forest manager should undertake preventive measures to minimize accidents at work related to forest operations.

Finding:
Rougier Gabon conducted a study to evaluate the risk of work accidents in its different sites. A total of 98 forest stations were reviewed and additional measures have been developed. The EPI management process (PRO_OP_SECU_025) identifies, at the workplace, risks, consequences, required EPIs and behaviors to outlaw or encourage. Accident statistics are saved in the file which allows to present monthly statements of work accidents and occupational diseases. An annual review shall be conducted at the end of each year to define the evolution (increase or decrease) of industrial accidents. However, there is a blockage in the implementation of the recommendations emanating from, because the budget resulting from this study has not been validated by the Rougier Gabon management. It is an element that leads to non-conformance.

For the year 2014, there has been a reduction in serious accidents while minor accidents have increased. For the more minor accidents, internal reporting of workplace accidents is made and signed by the doctor in order to trigger the action of full support by the CNSS.

Interviews with Rougier Gabon staff showed that the increase in minor accidents at work was mainly due to weak awareness of staff about the risks of work-place accident. On the same plan, the auditors found that the loggers were working without a security vehicle close enough to their place of work, that it lacked the anti-venom products in first aid kits in the forest and in the Mbouma Oyali site, Rougier Gabon had set up ambulance without a paramedic.

Evidence:
- Interviews with Mbouma Oyali factory workers, health and safety staff officials, employee representatives;
- Table assessing the risks of accidents;
- Visiting the sites Moyabi UFA and the infirmary of the Mbouma Oyali site.

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

Timeline for conformance: Before the next annual audit
Evidence provided by organization: PENDING
Finding after reviewing evidence: PENDING
NCR Status: OPEN
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**Description of Nonconformance and Related Evidence:**

**Requirement:**
Indicator 4.2.11 requires that the transportation of workers from their meeting points to their place of work should be provided by means of transport that are regularly checked and guarantee their safety.

**Findings:**
The transportation of workers on the Ivindo site and construction sites is ensured by Rougier Gabon vehicles. However, these vehicles are not equipped and regularly checked. Workers report that these vehicles are constantly breaking down and sometimes they are subject to long delays after working hours. In the register of grievances submitted by staff representatives, the transport problem was stated and the Rougier Gabon directorate promised to buy two new buses in 2014 to replace the old buses in use. This promise was not kept and a new promise to purchase was made for 2015 as evidenced by the register of grievances submitted by staff representatives met in the Mbouma Oyali site.

**Evidence:**
- Bouué operating site visit
- Interviews with the Delegates of staff and other workers of the Mbouma Oyali and Ivindo sites.

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

**Timeline for conformance:**
Before the next annual audit

Evidence provided by organization: PENDING
Finding after reviewing evidence: PENDING
NCR Status: OPEN
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**Description of Nonconformance and Related Evidence:**

**Requirement:**
Indicator 4.3.1 says that the pay and employee benefits must be compliant with the national regulations in force.

**Findings:**
The documentary review and interviews with HR managers shows that Rougier Gabon respects the Labour Code. Interviewed workers and employee delegates claim that the legal provisions on labor rights are respected.

However, workers have raised a concern about the salaries that were below the minimum income provided for by law. A verification of about fifty pay slips of the personnel department has noted that a case in this sample had a salary of 144,000 FCFA, which is less than the minimum monthly income of 150,000 FCFA.

**Evidence:**
- Interviews with workers of Mbouma Oyali sites, Ivindo site, Human Resources Managers, staff representatives;
- Review of Rougier Gabon workers’ payslips

**Corrective action request:** Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

**Timeline for conformance:** Before the next annual audit

**Evidence provided by organization:** PENDING

**Finding after reviewing evidence:** PENDING

**NCR Status:** OPEN

**Comments (optional):**

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**Description of Nonconformance and Related Evidence:**

**Requirement:**
Indicator 4.3.6 says the forest manager must have copies of ILO Conventions 87 and 98 and all supervisory staff must be made aware of said conventions.

**Finding:**
The RARH (administrative branches relays & human resources) were made aware of and trained in all the texts and legislation in the Gabon Labour Code. A filing cabinet with all the texts in force (in particular the Labour Code; variation order; social security code; decree implementing the Social Security Code; Practical Guide to CNSS, forest agreement; internal forestry regulation) was put in place.

Staff delegates have a filing cabinet with texts concerning them directly, including the Labour Code, collective forest agreement, the internal forestry regulation and agreements 87 and 98 of the OIT. However, delegates were not made aware of these conventions.

**Evidence:**
- Interviews with workers of Mbouma Oyali sites and of the Ivindo site, employee representatives;
- Visit of site UFA Ogooué Ivindo

**Corrective action request:** Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

  Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

**Timeline for conformance:** Before the next annual audit
## Description of Nonconformance and Related Evidence:

### Requirement:

Indicator 5.6.6 requires that the forest manager keep up-to-date records of the volumes harvested of all commercial timber species.

### Finding:

During the documentary review, the auditors noted that all felled trees are recorded in the field notebook and evacuations specifications in the waybills. These documents are issued by the forest administration and the data contained therein are compiled to calculate the different taxes. A visit to the UFA Moyabi operating site found a delay of almost 200 feet in the registration of felled trees. Furthermore, when analyzing the field notebook in the office, the auditors noted a delay of nearly a month in the recording of the trees felled in the field notebook. However, the auditors noted that felled and not recorded trees in the field notebooks were already reported in the internal felled trees monitoring sheets, and as these sheets are drafts for filling the field notebook, this information will appear sooner or later in the notebooks. The fact remains that all documents on harvested volumes are outdated.

### Evidence:

- Interviews with officials of the UFA Moyabi site
- Documentary review in the forest office of Mbouma Oyali
- Site visit of UFA Moyabi

### Corrective action request:

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

### Timeline for conformance:

By the next annual audit

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## Description of Nonconformance and Related Evidence:

### Requirement:

Indicator 4.5.4 requires that the forest manager maintains a complete and up-to-date record, including
associated documentation, relating to any grievances against the enterprise and the action taken to resolve them.

**Finding:**
Conflicts related to Article 251 (community development funds) should be treated by the Monitoring Committees, as stipulated in the terms of the statement of work in Article 5: “The Monitoring Committee noticeably has the task of to ensure the cohesion of the various sustainable development projects and, where appropriate, to make the necessary trade-offs in the event of profound differences between the parties.” Thus, auditors find that the villagers are often unaware that it is even part of these committees and what their role is, and sometimes even ignore their existence.

Again, these deficiencies increase the level of responsibility of Rougier, who must make up for the weaknesses of the Monitoring Committees. However, the identification and conflict management procedure of Rougier Gabon is applied to disputes over land rights and use rights as part of its forestry operations. This procedure is already the subject of non-conformance with indicator 2.3.1. However, Rougier Gabon has no procedure to document and resolve grievances caused by other activities, such as investments in communities across the financial contribution related to timber harvesting in accordance with Article 251 of the Forest Code. However, in almost all the sampled communities, auditors find insufficient involvement of Rougier Gabon in funded projects, poor communication with communities and a significant lack of monitoring and support resulting in a high failure rate of funded projects. The failures of the funded projects result in a social climate that festers in some villages, as well as the bitterness and even the suspicion of the villagers towards Rougier Gabon due to a lack of communication and accountability in the management of funds. For example, in one of the villages sampled, the Community fisheries project was recovered by an individual who made it a private commercial project. The community quickly communicated formally in writing to the prefect as well to Rougier Gabon. This communication remained undocumented and unanswered for 4 months, and the situation escalated to the point where the villagers have considered taking the law into their own hands.

However, Rougier Gabon has a complaints monitoring register for Haut-Ogooué, including the response and actions to take, but it is incomplete for this region (the auditors documented several complaints not reported in this register) and it is not applied to other regions where Rougier Gabon operates. This is in non-conformance and NCR 09/14 is issued.

**Evidence:**
- Interviews with 12 local communities;
- Interviews with Rougier Gabon staff;
- PROC SYS 024 Identification and management of conflicts;
- Suivi des plaintes Haut Ogooué 28 10 2014 revu EC

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

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

**Evidence provided by organization:**
PENDING

**Finding after reviewing evidence:**
PENDING

**NCR Status:**
OPEN

**Comments (optional):**
MAJOR NCR # 10/14  Classification of NC : Major X Minor
Standard & indicator: FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 6.2
Report section: Appendix IV

Description of Nonconformance and Related Evidence:

Requirement:
The requirements of criterion 6.2 (indicators 6.2.1, 6.2.2, 6.2.6 & 6.2.8) require that the Forest Manager have a clear policy on hunting and collection activities. These policies must be effectively communicated to employees, contractors and local residents. Mechanisms must be in place to ensure that hunting and trapping be controlled in compliance with applicable regulations.

Finding:
There are internal procedures and agreements with the authorities to control hunting activities in the territory. However, the verifications conducted during the audit indicate that the internal procedures are not implemented. The result is that the control of the harvest and of the hunting are inadequate, particularly because a large portion of the certified areas is accessible by road without being monitored. In addition, the authorities' monitoring mechanisms to ensure that hunting and trapping are monitored in accordance with current regulations are not implemented. These represent a major non-conformance as they represent a systemic failure that affects the whole territory visited during the audit (3 of the 4 certified CFAD).

Evidence:
- Field visits during the audit
- Interviews with Rougier Gabon staff
- Interviews with stakeholders.
- Procedures for control of access roads and internal hunting control.
- Bipartite or tripartite agreements for the control of illegal activities on CFAD

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

Timeline for conformance: Within 3 months of report finalization

Evidence provided by organization: PENDING
Finding after reviewing evidence: PENDING

NCR Status: OPEN

Comments (optional):

NCR # 11/14  Classification of NC : Major Minor X
Standard & indicator: FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 6.2.13
Report section: Appendix IV

Description of Nonconformance and Related Evidence:

Requirement:
The standard requires that there be evidence that company implements a system of regular and punctual controls to ensure hunting policies are respected.

Finding:
According to its procedures, the organization must implement a common verification system (10 monthly
and unannounced verifications) made by operation managers, employee monitoring operational positions, or the planner (in the Leke and Moyabi CFAD). However, during field audits the auditors noticed that the officials’ verifications are very infrequent for the workers and the company's subcontractors. For example, in the Ivindo CFAD only 2 logging trucks of the subcontractor were audited in 2014. In addition, the interviews indicate that logging trucks of the TBNI company which operates the forest north of the Ivindo CFAD and which crosses the CFAD for transporting logs are never checked. The team therefore finds that the control procedure is only partially implemented and therefore the requirement of the standard is not met.

Evidence:
- Interviews with Rougier Gabon staff
- Compilation of controls

Corrective action request: Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

Timeline for conformance: By the next annual audit

Evidence provided by organization: PENDING

Finding after reviewing evidence: PENDING

NCR Status: OPEN

Comments (optional):

NCR # 12/14 Classification of NC : Major Minor X

Standard & indicator: FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 6.2.14

Report section: Appendix IV

Description of Nonconformance and Related Evidence:

Requirement:
The company monitors and evaluates the effectiveness of control measures to enable improvements to control systems.

Finding:
The standard requires that a system be established to evaluate the effectiveness of control measures to enable improvements to control systems. During the audit, the organization was able to provide very little implementation of evidence of its control strategies in illegal activities and hunting. Officials argued that the measures in place such as unsupervised barriers allowing them to block the access to the territory without providing concrete evidence that this system is indeed effective. Overall, the audit team found that the organization has not given the means to verify the effectiveness of its control system for illegal activities and hunting. The requirement is not reached.

Evidence:
- Interviews with Rougier Gabon staff

Corrective action request: Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

Timeline for conformance: By the next annual audit
Evidence provided by organization: PENDING
Finding after reviewing evidence: PENDING
NCR Status: OPEN
Comments (optional): 

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Report section: Appendix IV

**Description of Nonconformance and Related Evidence:**

**Requirement:**
The forest manager must set up mechanisms for monitoring natural regeneration.

**Finding:**
In 2005, a forest regeneration monitoring device, 2 years after operations, was set up on skid trails and holes generated by the logging. An inventory was conducted which covered various relevant aspects of forest structure of which are seedlings, the recovery by ferns and Marantaceae, and the presence of seed. There is no monitoring following this framework. According to interviews with the manager, new monitoring will be carried out eventually, however auditors find that the frequency of monitoring is not documented and there is no preparation or concrete plan that was presented to these short-term monitoring while they already are nearly 10 years old. In comparison, permanent plots monitoring are carried out every 5 years. The auditor concludes that the monitoring provided for seedling regeneration after harvesting is not done.

**Evidence:**
- Interviews with Rougier Gabon staff

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

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

Evidence provided by organization: PENDING
Finding after reviewing evidence: PENDING

NCR Status: OPEN
Comments (optional): 

**MAJOR NCR #** 14/14  
Classification of NC : Major X Minor

Standard & indicator: FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 6.5.7
Report section: Appendix IV

**Description of Nonconformance and Related Evidence:**

**Requirement:**
The transport network within the FMU shall be planned, constructed and maintained in accordance with legal requirements and so as to avoid erosion and disturbance to the hydric network.

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Finding summary:
The auditors found significant damage to the environment due to sediment in streams on the open road network but not used for operations. The sediment supply is high because the road network is in poor condition because it has not been maintained adequately. Auditor interviews with Rougier Gabon staff show that the stream crossings in open road sections but not used are not subject to a regular rehabilitation. In some CFADs significant topographic variations involve a significant drop in the vicinity of some rivers which increases runoff and requires more maintenance. This non-conformance is major because it is systemic to the open roads but not used and affects a large area (including 60 km of the road) of the Léké CFAD visited during the audit.

Evidence:
- Field visits during the audit
- Interviews with Rougier Gabon staff
- Road construction procedures

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

Timeline for conformance: Within 3 months of report finalization

Evidence provided by organization: PENDING

Finding after reviewing evidence: PENDING

NCR Status: OPEN

Comments (optional):

NCR # | 15/14 | Classification of NC : Major | Minor X
--- | --- | --- | ---
Standard & indicator: | FSC Forest Stewardship Standard for the Congo Basin Region – April 2012, indicator 8.1.3 |
Report section: | Appendix IV |

Description of Nonconformance and Related Evidence:

Requirement:
The frequency and intensity of monitoring shall be determined and adapted for the scale and intensity of management, as well as the sensitivity of the environment concerned to facilitate comparison of results and assessment of change.

Finding:
Field visits showed that road infrastructure such as bridges or even roads close to rivers were in poor condition, while the monitoring which were made a few months earlier had not shown that these infrastructures needed to be rehabilitated (Several comments on the 60 km from the main road of the Léké SMFC visited during the audit). Similarly, sectors that showed damage to the environment had been monitored, but the damage had not been documented. The auditors conclude that the monitoring is not well adapted to the sensitivity of the environment in question.

Evidence:
- Interviews with Rougier Gabon staff
- Sheets for the monitoring of operations, infrastructure, etc.

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

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

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<td>Report section:</td>
<td>Appendix IV</td>
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**Description of Nonconformance and Related Evidence:**

**Requirement:**
The forest manager must have a documented system for the collection of data on the presence of major species of flora and fauna within the FMU, permitting the identification and description of any changes within the populations over time.

**Finding:**
The organization monitors the changes in the flora through its operating inventories and by its permanent plots’ monitoring. Nevertheless, the organization has not shown to have a documented system for collecting data on the presence of wildlife species.

**Evidence:**
- Interviews with Rougier Gabon staff

**Corrective action request:**
Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.

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

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**Description of Nonconformance and Related Evidence:**

**Requirement:**
The forest manager shall have a specific data collecting programme to demonstrate the maintenance of any high conservation values within the FMU.
Finding:
The monitoring protocol in place to validate the implementation of HCV protection measures. However, the approach does not allow to monitor the state of the values to be protected by these measures. Indeed, the organization did not provide indicators to monitor any changes in the status of HCV after application of the procedures adopted.

Evidence:
- Interviews with Rougier Gabon staff
- HCVF Report
- HCVF Monitoring Protocol

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

Timeline for conformance: By the next annual audit

Evidence provided by organization: PENDING

Finding after reviewing evidence: PENDING

NCR Status: OPEN

Comments (optional): 

2.5. Audit decision

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

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