Public Certification Summary for FSC Controlled Wood Certification (FSC-STD-40-005) for Enviaudits Ltd

Annual audit 2018
Report date: 22-10-2018
Certificate code: NC-COC-005535/NC-CW-005535
Issued date: 31-10-2016

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INTRODUCTION

NEPCon is an international, non-profit organisation that delivers sustainability services and engages in innovation projects to facilitate the transformation of business practices and consumer behaviour to promote the responsible use of natural resources. Around 1,300 Chain of Custody-certified clients benefit from our over 15 years of experience in providing services to the forest supply chain sectors – including timber processing and manufacturing companies, printing houses, publishers, paper merchants, traders and retailers of all sizes.

Through a well-developed network of regional representatives and contractors, NEPCon offers timely and cost-effective certification services around the world.

The purpose of this report is to comply with requirements of accreditation standard FSC-STD-20-011 V4-0, which requires certification body to publish a certification summary for the controlled wood evaluation according to standard FSC-STD-40-005 V3 on FSC database.

If there are any necessary follow-up actions required by your Organisation, they are outlined in an Audit Conclusions section of this report.

Dispute resolution: If NEPCon clients encounter organisations or individuals having concerns or comments about NEPCon services, these parties are strongly encouraged to contact the relevant NEPCon regional office or any member of the NEPCon Chain of Custody Programme. Formal complaints and concerns should be sent in writing.

Impartiality commitment: NEPCon commits to using impartial auditors and our clients are encouraged to inform NEPCon management if violations of this are noted. Please see our Impartiality Policy here: http://www.nepcon.org/impartiality-policy
1. AUDIT CONCLUSIONS

1.1. Auditor Recommendation

Based on Organisation's conformance with FSC Chain of Custody requirements, the auditor makes the following recommendation:

- ☒ Certification approved
  - No NCRs issued

- ☐ Certification not approved
  - Choose auditor conclusion from drop down menu

General audit comments (optional): None

1.2. Certification Decision

Based on auditor's recommendation and NEPCon quality review, the following certification decision is taken:

<table>
<thead>
<tr>
<th>NEPCon certification decision:</th>
<th>Certification approved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certification decision by (name of the person):</td>
<td>Debora van Boven-Flier</td>
</tr>
<tr>
<td>Date of decision:</td>
<td>22nd October 2018</td>
</tr>
<tr>
<td>Date of updated decision if additional audit (e.g. corrective action verification or scope change) was conducted:</td>
<td>N/A</td>
</tr>
</tbody>
</table>

1.3. Non-Conformity Reports (NCRs)

NCRs describe evidence of Organisation non-conformities identified during audits. NCRs include defined timelines for the Organisation to demonstrate conformity. MAJOR NCRs issued during assessments/reassessments shall be closed prior to issuance of certificate. MAJOR NCRs issued during annual audits shall be closed within timeline or result in suspension.

No NCRs issued for the controlled wood standard
1.4. Closed Non-Conformity Reports (NCRs)

<table>
<thead>
<tr>
<th>NCR number: 18319</th>
<th>NC grading:</th>
<th>Major ☐</th>
<th>Minor ☒</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standard &amp; Requirement:</td>
<td>FSC-STD-40-005 V3-1 - 1.1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Description of Non-conformance:**

EJ Holmes & Sons Ltd (IM): The member was provided by the GM on the 24th July the revised procedure from purchasing Uncertified wood, which includes also a training form, an internal audit and annual review forms (2017 Audit Exh 1K).

It is noticed, however, that the member is still using/implementing the old procedures (2017 Audit Exh 1J) including records of purchase of uncertified material – see 2017 Audit Exh 4N_IM(b).

This does not pose any risk in terms of uncontrolled material entering certified products, because of the nature of the industry (chestnut paling limited to local UK counties); however, the member shall ensure that his system is up-to-date and in line with the new standard.

**Corrective action request:**

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

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

**NCR conformance deadline:**

By next audit, but not later than 12 months after report finalisation date

**Client evidence:**

Group Member training form, internal audit and annual review forms (Exh 7 IM)

**Evaluation of Evidence:**

Refresher training on the purchasing of uncertified wood was recorded for Debbie Holmes, the Group Member’s FSC responsible person. The Group Member has demonstrated that it has implemented and used those documents as provided by the Group Manager to fully document its diligence system (DDS) for material supplied without an FSC claim. The member has carried out an internal audit and review of its DDS, although no changes had been noted based on a review of supplier invoices. Internal audit and reviews were conducted 30-08-2017 and 28-02-2018.

**NCR Status:**

Closed

**Comments (optional):**
Appendix A: Description of the Due Diligence System, including information provided by the organisation according to FSC-STD-40-005 V3-1, Section 6

1. General information

<table>
<thead>
<tr>
<th>Organisation name:</th>
<th>Wessex Woodland Management Ltd (LO), E J Holmes &amp; Sons Ltd (IM), JS Cole Ltd (IO), D S Norman (JO)</th>
</tr>
</thead>
<tbody>
<tr>
<td>FSC certificate code:</td>
<td>NC-COC-005535 (LO), (IM), (IO), (JO)</td>
</tr>
<tr>
<td>Organisation’s DDS contact person:</td>
<td>Jamie Stewart (LO), Debbie Holmes (IM), Stuart Cole (IO), David Norman (JO)</td>
</tr>
<tr>
<td>DDS prepared/assisted by:</td>
<td>John Barne, Group manager</td>
</tr>
<tr>
<td>Date last reviewed/updated (by the organisation):</td>
<td>09th August 2017 (LO), 18th July 2017 (IM), 28th July 2017 (IO), 5th September 2017 (JO)</td>
</tr>
</tbody>
</table>

2. Suppliers

<table>
<thead>
<tr>
<th>Participating site</th>
<th>Non-certified material type sourced</th>
<th>Exact number of suppliers</th>
<th>Supplier type(s)</th>
<th>Average no. of tiers in the supply chains</th>
<th>Approximate or exact number of sub-suppliers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name of organisation’s site. All applicable sites shall be included.</td>
<td>Describe the type of product supplied e.g. logs, sawn logs, chips, wood pulp, etc.</td>
<td>Number of suppliers directly supplying material to the site</td>
<td>E.g. Forest management enterprise, Broker/trader without physical possession, Primary processor, Secondary processor, Distributor/wholesaler.</td>
<td>Average number of organisations within the supply chains, from forest to suppliers.</td>
<td>Total number of organisations that are sub-suppliers (indirect suppliers, or suppliers of your direct suppliers) within all supply chains</td>
</tr>
<tr>
<td>Wessex Woodland Management Ltd (LO)</td>
<td>logs</td>
<td>Exact number not collected, see Obs 18325</td>
<td>Forest private owners</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>------------------------------------</td>
<td>------</td>
<td>------------------------------------------</td>
<td>----------------------</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>E J Holmes &amp; Sons Ltd (IM)</td>
<td>Chestnut coppice or chestnut poles</td>
<td>Exact number not collected, see Obs 18325</td>
<td>Forest private owners, or harvesting contractors</td>
<td>1 or 2</td>
<td>1</td>
</tr>
<tr>
<td>JS Cole Ltd (IO)</td>
<td>Logs</td>
<td>Exact number not collected, see Obs 18325</td>
<td>Forest private owners</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>D S Norman (JO)</td>
<td>Logs</td>
<td>Exact number not collected, see Obs 18325</td>
<td>forest manager, landowner or felling contractor</td>
<td>1</td>
<td>0</td>
</tr>
</tbody>
</table>

3. Supply areas

<table>
<thead>
<tr>
<th>Supply area</th>
<th>Controlled wood category</th>
<th>Reference to risk assessment used</th>
<th>Risk designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>England and Scotland</td>
<td>1</td>
<td>FSC-CNRA-UK V 1-0</td>
<td>Low risk</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>FSC-CW-RA-006-GBR 1-0 (UK Old NRA)</td>
<td>Low risk</td>
</tr>
<tr>
<td></td>
<td>3</td>
<td>FSC-CW-RA-006-GBR 1-0 (UK Old NRA)</td>
<td>Low risk</td>
</tr>
<tr>
<td></td>
<td>4</td>
<td>FSC-CW-RA-006-GBR 1-0 (UK Old NRA)</td>
<td>Low risk</td>
</tr>
<tr>
<td></td>
<td>5</td>
<td>FSC-CW-RA-006-GBR 1-0 (UK Old NRA)</td>
<td>Low risk</td>
</tr>
</tbody>
</table>

4. Risk assessment and mitigation

4.a Risk mitigation for the origin of the material

*N/A, all supply areas are low risk.*
4. b Risk assessment and mitigation for mixing in the supply chain

<table>
<thead>
<tr>
<th>Participating site</th>
<th>Supply chain type and supply area</th>
<th>No. of tiers</th>
<th>Risk of mixing</th>
<th>Control measures</th>
<th>Findings from field verification if undertaken as a control measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>This table shall be filled for each applicable participating site (listed in the table in Section 2).</td>
<td>Describe each type of supply chain e.g. • Wood delivered and purchased directly from concession holder to Organisation’s log yard • Wood delivered and purchased directly from concession holder to Organisation’s log yard, but purchased through a round wood trader. • Wood delivered from forest to railway terminal and transported by train to organisation and state the relevant supply area, or state that the material previously had an FSC claim but was coursed from a non-FSC certified (chain of custody) supply chain.</td>
<td>‘Tiers’ indicates the legal entities taking ownership of the wood from harvesting to the organisation purchasing it. If there is only 1 tier, it means that wood is purchased directly from the concession holder.</td>
<td>Summarise the risk assessment of mixing in this supply chain. Justify any conclusions.</td>
<td>If risk is identified, state what actions are being taken to mitigate that risk. Describe the activities that have been conducted by the organisation to verify the effectiveness of the control measures. Include information on the cycle (how often verification is conducted), number of audits, justification of sampling intensity, and the key results of the audits. If non-conformities were found, state steps taken to address them.</td>
<td>Summarise findings, if field verification was conducted. Describe steps taken to address any non-conformities found, unless confidential. If information is deemed confidential and not published, provide a justification for this.</td>
</tr>
<tr>
<td>Wessex Woodland Management Ltd (LO)</td>
<td>Wood delivered and purchased directly</td>
<td>1</td>
<td>Low</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Company Name</td>
<td>Description</td>
<td>Grade</td>
<td>Remarks</td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>E J Holmes &amp; Sons Ltd (IM)</td>
<td>Wood delivered and purchased directly from concession holder to Organisation’s log yard</td>
<td>1 or 2</td>
<td>Low</td>
<td>In case of 2 tier, the delivery documentation is examined to verify origin (which is just from local counties Kent and Sussex – no material is sourced anywhere else than locally for this type of industry = chestnut coppicing)</td>
<td></td>
</tr>
<tr>
<td>JS Cole Ltd (IO)</td>
<td>Wood is bought standing</td>
<td>1</td>
<td>Low</td>
<td></td>
<td></td>
</tr>
<tr>
<td>D S Norman (JO)</td>
<td>Wood is purchased at roadside from landowner or forest manager and invoiced by load of timber extracted</td>
<td>1</td>
<td>Low</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

5. Technical experts used in the development of control measures

N/A, technical experts were not required.

6. Stakeholder consultation processes

N/A, stakeholder consultation not required
7. Complaints procedure

We encourage stakeholders who have suggestions for improvements, comments, or complaints related to our controlled wood due diligence system to contact John Barne john@oxta.co.uk by mail, email, or phone. We commit to follow up on stakeholder input as soon as we receive it and to provide stakeholders with feedback within 2 weeks.

Provide the organisation’s complaints procedure. The procedure must satisfy the requirements of Section 7 of the standard.

The procedure, taken from Doc 14 of the GM states:

“If a complaint is received from a stakeholder you must:

a) Acknowledge receipt of the complaint;
b) Inform stakeholders of the complaint procedure, and provide an initial response to complainants within two weeks;
c) Forward complaints related to risk designations in the relevant FSC risk assessment to the responsible body (When a complaint is forwarded to a responsible body, d) – k) below do not apply).
d) Conduct a preliminary assessment to determine whether evidence provided in a complaint is or is not substantial, by assessing the evidence provided against the risk of using material from unacceptable sources;
e) Communicate with complainants to try to solve complaints assessed as substantial before further actions are taken;
f) Forward substantial complaints to the certification body and relevant FSC National Office for the supply area within two weeks of receipt of the complaint. Information on the steps to be taken in order to resolve the complaint, as well as how a precautionary approach will be used, shall be included with the complaint;
g) Employ a precautionary approach towards the continued sourcing of the relevant material while a complaint is pending. This includes a description of how the precautionary approach is employed when a complaint is active.
h) Implement a verification process (e.g. field verification and/or desk verification) for a complaint assessed as substantial within two months of their receipt;
i) Determine the corrective action to be taken by suppliers and the means to enforce its implementation by a supplier if a complaint has been assessed and verified as substantial. If a corrective action cannot be determined and/or enforced, the relevant material and/or suppliers shall be excluded;
j) Verify whether corrective action has been taken by suppliers and whether it is effective;
k) Exclude the relevant material and suppliers if no corrective action is taken;
l) Inform the complainant, the certification body, and the relevant FSC National Office of the results of the complaint and any actions taken towards its resolution, and maintain copies of relevant correspondence;
m) Record and file all complaints received and actions taken.”

Annex

n/a
Appendix B: Summary of the evaluation of the Due Diligence System against FSC-STD-40-005 V3-1

1. Evaluation of justification for the organisation excluding confidential information (according to Clause 6.2 (d) in FSC-STD-40-005 V3-0) – See Appendix C2 (Description of the Due Diligence System)

N/A

2. Extensions granted to the organisation for using approved FSC risk assessments

N/A

3. Brief description of the system developed for the evaluation of the DDS

Within NEPCon’s system for evaluating an organisation’s due diligence system (DDS), auditors evaluate the presence and quality of a documented DDS in accordance with all applicable requirements of the FSC standards and additional guidance provided by the FSC Policy and Standards Unit. The DDS is evaluated for its relevance, effectiveness and adequacy. When auditing, sampling is conducted to capture variation in supply areas, operations, and risks.

Obtaining information

Auditors evaluate whether the due diligence system is comprehensive and allows organisations to identify risk at the forest level, and of mixing within supply chains. Organizations must be able to provide:

- supplier list (including sub suppliers) in a comprehendible format.
- supply chain map to understand who supplies whom.
- an indication of the material type being purchased
- documented evidence of the above

Auditors must confirm the legitimacy of the information through e.g. cross-referencing documentation with other reliable sources of information, interviewing appropriate persons about the contents of the documentation, confirming authenticity of documentation with the persons or government body that is the issuer, and conduct supplier audits.

Risk assessment

When an FSC risk assessment is used, auditors evaluate whether the correct versions are used by checking the FSC Document Centre and FSC-PRO-60-002b. When company risk assessments are used, auditors verify that that risk assessments are prepared according to requirements and that the contents and results of the risk assessment are adequate and justified, and consistent with publicly available information. Risk assessments for mixing in supply chains must be supply chain-specific.

Risk mitigation

Auditors must verify the implementation of control measures, including:
• minimum requirements for control measures;
• mandatory control measures provided in national risk assessments;
• whether applicable approved documents listed in FSC-PRO-60-002b were used;
• use of experts, when required;
• use of stakeholder consultation, when required

The implementation of each type of control measure is sampled.

Adequacy of control measures is evaluated by:
• comparison with example control measures in Annex E in FSC-STD-40-005 V3-0;
• results of internal and external audits by the organization;
• comments from stakeholder consultation;
• comments, complaints, and appeals received by NEPCon;
• the process of review and revision of the DDS by the organization.

4. Summary of findings from field verification (confidential findings excluded from FSC DDS public summary appendix below)

N/A