FSC Forest Management Certification
Surveillance audit

Report on:
ROUGIER GABON
in

CFAD of l’Ogooué-Ivindo
at Ivindo,
Republic of Gabon

Report finalised: 29 January 2020
Audit period: 22 to 26 October 2019
Audit Team: Philippe CASANOVA, Lead Auditor
Ugo LAPOINTE
Armel TSIBA-NGOLO

Type of certificate: GF/CdT
Certificate Code: NC-FM/COC-035450
Date of issue/expiration of certificate:
08/11/2018
11/8/2018 / 11/7/2023

Organisation Contact:
Éric Chezeaux
ZI OLOUMI BP 130
Libreville (Gabon)
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INTRODUCTION

This report presents the findings of an independent certification audit conducted by a team of specialists representing NEPCon. The audit aims to assess the ecological, economic and social performance of Rougier Gabon for the CFAD - Ogooué-Ivindo forest management as defined by the principles and criteria of the Forest Stewardship Council™ (FSC™).

This report contains several sections containing information and audit findings, as well as several appendices. Parts 1 to 3 of the report and Annex I will be made publicly available on the forest management operation and may be distributed by NEPCon or the FSC to interested persons. The remainder of the annexes are confidential and may only be reviewed by authorized NEPCon and FSC personnel under confidentiality agreements. A copy of the public summary of this report is available on the FSC website at http://info.fsc.org/.

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1 AUDIT RESULTS

1.1 Audit Recommendation and certificate decision

Taking into account the Organization's compliance with the certification requirements, the following recommendation is made:

X Certification approved:
On acceptance of the NCRs formulated below

☐ Certification refused:

Additional comments, including points deemed controversial or difficult to audit and explanation of the conclusion drawn: None

1.2 Report of non conformity (NCR)

Note: NCRs describe the evidence of organizational non-conformances identified during an audit. CDNs set specific deadlines during which the Organization has an obligation to prove compliance. Major RNCs formulated during re-certification audits / audits are closed prior to the issuance of a certificate. MAJOR RNCs formulated during the audits are closed before a certain time otherwise they give room for a

☐ Check in case there is (are) no NCR(s) formulated

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<thead>
<tr>
<th>RNC 2.3.5/18</th>
<th>Classification of NC : MAJOR</th>
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<tbody>
<tr>
<td>Standard &amp; Requirement :</td>
<td>FSC Forest certification standard for the Congo Basin–April 2012, indicators 2.3.5</td>
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Section of report:

Description of non conformity and associated evidence :

Summary Requirement: Indicator 2.3.5

The neighboring communities acknowledge that they have been informed beforehand of all the procedures for resolving conflicts related to the exercise of their rights of use before freely giving their consent and are able to describe these procedures.

Findings of the 2018 audit:

The different communities met by the auditors show strong dissatisfaction with Rougier Gabon, which has been slow to resolve the problems linked to the application of decree 105 (FDL).

This feeling is reinforced by the fact that Rougier Gabon did not send a letter acknowledging receipt, setting a response time, or a specific and reasonable cause for refusal to a written request from the population.

The communities are not always able to describe in detail the procedures for resolving conflicts, but generally indicate that they have been informed. Some people can certainly indicate that they were not informed of the complaints process, but the level of information may be different within a community and the Rougier Gabon social team was
able to produce signed minutes indicating that meetings had been successfully carried out with said communities.

On the other hand, the latter are insufficiently informed of the usefulness of producing a letter instead of an oral claim. For example, two villages complain about the use of their resources (gravel, sand) by Rougier Gabon without collective financial compensation, but do not seem to have a written record of their dissatisfaction. The complaints management process must be amended to avoid misunderstanding by the communities regarding the proper consideration of their claims.

2018 audit evidence:

- Interviews with Rougier staff
- Visits to communities.
- Review of the filing of grievances / complaints / grievances, and review of complaints management procedures (arrives in a filing cabinet at ROUGIER GABON).
- PROC SYS 024 V4 conflict management identification (Exhibit 36c in the appendix to the report.).
- Update on project management and awareness raising.xls (Exhibit 35b in annex to the report.).
- FDL

Findings of the 2019 audit:

However, following:

- The testimony of the population of Inzanza questioned by the auditor;
- Triangulation with the Rougier Gabon external social team and;
- Analysis of the external social file cabinet;

It appeared that the populations relating to the old social policy of Rougier (and who are not FDL) were not sensitized. Consequently, this NCR remains open and becomes a Major.

Evidence from the 2019 audit:
Interviews with local populations
Interview with Coc manager and external social service
Analysis of the external social file cabinet,

| Corrective action required : | The organization shall implement corrective actions to demonstrate compliance with the requirement (s) listed above. Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence |
| Deadline for conformity : | In the 3 months following the date of the finalisation of report |
| Evidence provided by Organisation : | PENDING |
| Findings following evaluation of evidence : | PENDING |
| Status of NCR : | OPEN |
| Comments (Optional) : | |

Findings following evaluation of evidence :
<table>
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<td>Standard and article referenced:</td>
<td>FSC Forest certification Congo Basin – April 2012, indicator 4.2.1</td>
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<tr>
<td>Section of report:</td>
<td>Annexe IV</td>
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**Description of non-conformity and justifying evidence:**

**Summary Requirement:**

The standard requires that the forest manager takes preventive measures to minimize work accidents related to forestry operations. Working conditions must be in line with the labor code and ILO recommendations. There should be rules and procedures that should be distributed to employees to make them aware of the need to meet safety standards. Appropriate safety equipment must be distributed to workers and workers must wear it when they are at their respective work stations. Workers must pass medical examinations in accordance with national laws.

**Findings of the 2018 audit:**

In accordance with the procedure for periodic medical examinations in force (PROC OP RH 004), workers on forestry sites must take a medical examination twice a year (Semi-annual visits). For financial reasons, the first medical visit took place at the beginning of September 2018 and the second is scheduled for November 2018.

The report of this annual visit is not yet available but all the Rougier Gabon employees assigned to the Kouma FMU have not taken this compulsory visit (See Art 210 of the labor code), have not received any request for an explanation to this effect for those absent and no additional visit planning for these was presented to the auditors in accordance with the procedure.

**2018 audit evidence:**

- Report of medical visits from 09 to 12/09/2018;
- Staff interview;
- Labor Code.

**Findings of the 2019 audit:**

Regarding medical visits, there has been improvement and the problem has been resolved. However, two observations made during the audit contribute to raising this non-compliance to major.

1) PPE was out of stock and according to interviews with workers and company executives, some workers including chainsaw operators worked without having all the personal protective equipment required by law and by the procedures of the company.

2) At the time of the audit, the evacuation vehicle for the forest was broken down and under repair. The staff vehicle was the temporary vehicle but is not suitable for this function.

The auditors conclude that these findings reveal a collapse of the system to ensure the safety of personnel. This NCR becomes a Major.

**Evidence from the 2019 audit:**

- Interview with nurses
- Interview with the QHSSE team
Medical reports for March, August and September 2019.

**Corrective action required:**
The organization shall implement corrective actions to demonstrate compliance with the requirement (s) listed above.
Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

**Deadline for conformity:**
3 months following the date of finalization of audit report.

**Evidence provided by Organisation:**
PENDING

**Findings following evaluation of evidence:**
PENDING

**Status of NCR:**
OPEN

**Comments (Optional):**

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**NCR: 4.3.1/18**

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<td>FSC Forest certification Standard Congo Basin– April 2012, indicator 4.3.1</td>
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**Report Section:**
Annexe IV

**Description of Non-conformance and Related Evidence:**

**Requirement:**
All the prescriptions / provisions of the labor code and of ILO conventions 87 and 98 must effectively be applied:
The labor code and its enabling texts (a collective agreement for example) as well as the ILO recommendations, if any, must be respected.
Salaries and benefits must comply with applicable national regulations.
Employees organize and negotiate freely with the forest manager.
There must be a permanent and functional body representing the interests of workers.

**Finding:**
At the time of the audit, the reclassification process was being implemented on the human resources side. Several workers had been upgraded to reflect the position they actually occupied. For workers who are transitioning from one job to another, a clear process has been developed that includes formal testing of the worker in the new job. Since the previous audit, 41 workers have been identified for redeployment to another position. This process is initiated when human resources are informed by managers in the forest of a change of function for a worker.

Interviews with managers in the forest, that is to say the team leaders and the operations manager, show that they were not trained to identify job changes. In particular, they could not confirm when human resources were notified in the classification process. In addition, they confirmed that some workers were not in their regular jobs. Thus, the auditors conclude that an important component of the process still remains to be done, that is to say to train the executives in the forest so that they are able to identify the changes of position.

**Evidence considered:**
- Meetings with workers and union representatives
- Meeting with Heads of Rougier and staff leadership
- Internal notes and files on reclassification
Corrective action required : The organization shall implement corrective actions to demonstrate compliance with the requirement(s) listed above.
Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

Deadline for conformity : 3 months following the date of finalisation of report

Evidence provided by the Organisation: PENDING

Findings after evaluation of evidence : PENDING

Status of NCR : OPEN

Comments (optional) :

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<td>Section du rapport :</td>
<td>Annexe IV</td>
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**Description of non conformity and associated evidence :**

**Summary Requirement :**
Written evidence must show that the forest manager is up to date with payment of all applicable taxes and other charges, including fines.

**Finding:**
The tax file presented by ROUGIER GABON reveals that certain written proof of payment of taxes and other fees is missing. The excel summary table (see proofs below) clearly states that certain taxes have not yet been paid. By triangulation with the accounting department it is proven that the following taxes are due:
- AGEOS, APDMM and nuisance tax in negotiation with the administration
- TCS, FNH, CFP, CSS awaiting the reinstatement of VAT compensation.
- IMF, IRPP to compensate with the EPA.

The auditor describes this NC as a minor, because despite their financial difficulties ROUGIER GABON makes efforts to put themself in order with the administration. Contacts were established to find solutions. For the CNSS and the CMAGS Rougier Gabon concluded a moratorium and respects it.

**Evidence:**
- Interviews with the accounting department of ROUGIER GABON
- Excel Table taxes2019.xls (Exhibit 10b in annex to the report.)
- Forest Wood, Social and Fiscal tax file (Exhibit 10 in the appendix to the report.)
- Meeting with the CMAMGS in Libreville.
- CNAMS file (in file file 10 in annex to the report.)
- CNSS file (under file part 10 in the appendix to the report)

Corrective action required : The organization shall implement corrective actions to demonstrate compliance with the requirement(s) listed above.
Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

Deadline for conformity : During the next annual audit but not later than the 12 months following the date of finalization of report

Evidence provided by organisation : PENDING
## Findings after evaluation of evidence:

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<td>Comments (OPTIONAL) :</td>
<td>Compliance to the moratoria in force must be verified at each audit.</td>
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### NCR : 4.1.6/19

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<td>Section du rapport :</td>
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### Description of non conformity and associated evidence :

#### Summary Requirement :

The forest manager must contribute to the development of the local economy.

#### Finding:  
ROUGIER GABON has demonstrated clear progress in complying with decree 105. The sums due for the FDL are provisioned and contractual specifications are signed with the populations (see evidence below). ROUGIER GABON had also made commitments within the framework of its old social policy (Nzanza for example). During the triangulation with the local populations by the auditors, it appears that the populations express a strong dissatisfaction because (according to them) the promises are not kept. An analysis of the file on project management and sensitization and interviews with company staff proves that ROUGIER GABON is undertaking actions relating to external social issues, but that to date the impact in terms of development of the local economy and improvement of the sanitary conditions is slow to materialize (projects not yet completed: Nzanza dispensary not yet open, green space project not yet completed in Mangoumba or agricultural project in Mouyabi not yet completed).

#### Evidence:  
- Interviews with the external social service of ROUGIER GABON.
- MANGOUUMBA contractual specifications.pdf (Exhibit 36 in the appendix to the report.)
- Contractual specifications MOUYABI.pdf (Exhibit 34 in the appendix to the report.)
- Meetings with communities.
- Update on project management and sensitization.xls (Exhibit 35b in annex to the report.).
- Provision FDL 30 09 2019 v2.xls (Exhibit 19 appended to the report.).

#### Corrective action required :  
The organization shall implement corrective actions to demonstrate compliance with the requirement (s) listed above.  
Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

#### Deadline for conformity :  
During the next annual audit but not later than the 12 months following the date of finalisation of report.

#### Evidence provided by Organisation :  
PENDING

#### Findings following evaluation of evidence:  
PENDING

### Status of NCR :  
OPEN

#### Comments (Optional) :  
Note that the Mamgoumba Bus project was completed very recently and has not yet had an impact as a result, and that since the closing meeting ROUGIER GABON has provided documents (eg purchase of medicines for the dispensary) tending to demonstrate their willingness to quickly demonstrate the impact of their social actions.
**NCR : 4.2.9/19**

**Classification of NC : minor**

**Standard & requirement :**

- FSC Forest certification Standard for Congo Basin– April 2012, indicators 4.2.9

**Section of report :**

<table>
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<th>Description of non conformity and associated evidence :</th>
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| **Summary Requirement :**
| There must be a written emergency management plan in case of a serious accident suffered by a forestry worker or a subcontractor, which includes a provision for rapid evacuation to a medical outfit with appropriate equipment.  |
| **Finding:**
| The emergency evacuation procedure for the Ivindo site was developed in November 2010, then improved in September 2019 (PROC-SECU-IVI-001 of June 2019 and revised in 09/2019).
| This flowchart procedure (diagrams) provides for evacuation to various better-equipped partner medical facilities, depending on the severity of the case and the distance from the site of the accident.
| The company took the option of evacuating the injured on Booué and Libreville by choosing two operating modes:
| - When the accident is serious but under control, evacuation will take place from there by train;
| - If the situation cannot be brought under control, a high emergency reported by the site doctor, a medical helicopter from the military hospital will be mobilized according to the provider's administrative procedures.
| A stretcher-bearer was placed in the site manager's vehicle so that he could commute in the event of an accident between the forest and the Ivindo infirmary. In addition, the company does not have a transfer vehicle (with suitable equipment, for example, which includes the attachment of stretchers, oxygen and the other equipment generally found in evacuation vehicles). The vehicle was broken down according to the Rougier management team.
| The verification of the grievance book kept by the staff representatives highlights the staff grievances several times over the imperative acquisition of an ambulance. Management replied to the workers several times that "the issue is being dealt with".
| The evacuation of serious accident victims by helicopter, recommended by the company, is less reassuring for the personnel by the fact that the helicopter is an external resource. However, in another CFAD Rougier recently implemented its procedure and used a helicopter to evacuate a seriously injured person which demonstrates that the company's procedure is feasible. If a helicopter is not available or the train has broken down, the only other option is the evacuation vehicle. Thus, the fact that the evacuation vehicle used is not suitable for evacuations is a non-compliance.
| **Evidence considered:**
| - Staff Interview;
| - verification of the existence of a vehicle on the ground.

**Corrective action required :**

The organization shall implement corrective actions to demonstrate compliance with the requirement (s) listed above.
### NCR: 6.3.9/19

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<td><strong>Report Section:</strong></td>
<td>Annex IV</td>
</tr>
<tr>
<td><strong>Description of Non-conformance and Related Evidence:</strong></td>
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<tr>
<td><strong>Requirement:</strong></td>
<td>Areas exposed to a high risk of fire are identified and preventive measures implemented</td>
</tr>
<tr>
<td><strong>Finding:</strong></td>
<td>The company indicates that there is no risk of fire in the CFAD, but at the same time that there is a risk of fire adjacent to the CFAD due to burning by the villagers. The auditors conclude that the reflection is incomplete as to whether there are risks of fires especially in the event of prolonged drought in the context of climate change. Since there is very little risk of fire, but the reflection on the risk of fire is incomplete, a minor non-conformity is issued.</td>
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<tr>
<td><strong>Evidence considered:</strong></td>
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<tr>
<td>- Interviews with the applicant’s staff.</td>
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<td><strong>Demande d’action corrective :</strong></td>
<td>The organization shall implement corrective actions to demonstrate compliance with the requirement(s) listed above. Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence</td>
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<td><strong>Deadline for conformity :</strong></td>
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<td><strong>Evidence provided by Organisation :</strong></td>
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<td><strong>Findings after evaluation of evidence :</strong></td>
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<td><strong>Comments (optional) :</strong></td>
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1.3 Observations

Note: Observations are made for the early stages of a problem that is not itself a non-compliance, but which in the eyes of the audit team could become a non-compliance if it is not resolved by the Organization. An observation can become a true nonconformity if it is not resolved.

☐ No observations

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<th>OBS : 1.1/19</th>
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<td>Annexe I</td>
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Description of findings leading to observation:

Summary Requirement:
Indicator 1.1.1. The forest manager must be legally registered in accordance with the regulations in force and have all the documentation required for this registration.
Indicator 1.4.1. All conflicts between FSC principles and local law must be identified and documented.

Finding:
The Rougier Gabon company has a provisional title; while it is not supposed to last more than 3 years, the CFAD had to be definitively awarded by Decree of the Prime Minister. The administration has still not completed this formality and the situation is general in the country.

It conflicts with the principles of the FSC since the company has no legal title, but the responsibility is that of the Gabonese State; Rougier Gabon must nevertheless document this conflict and continue to try to resolve it.

Observation:
Observation: The company should regularly bring up to the administration this subject and document the follow-up to this conflict.

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<th>OBS: 1.5.1/19</th>
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Description of findings leading to observation:

At the time of the audit, the FST team was not on track to fully meet its targets for verification missions to the CFAD. Indeed, the FST team lacks means of travel, in particular because their 2 motorcycles are broken down. In addition, since a change of Provincial Director for Water and Forests, the administration has not carried out the activities described in the agreement signed with Rougier Gabon.

However, this is not a non-compliance since the FST team has been very active and has demonstrated its effectiveness by making several reports.
**Observation:** The certificate holder should ensure that he puts in place the necessary means to protect the territory.

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<th>OBS : 3.1.13/19</th>
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<td>Annexe X</td>
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<tr>
<td><strong>Description of findings leading to observation :</strong></td>
<td><strong>Summary Requirement :</strong></td>
<td>The conditions on which the expression of consent and its possible withdrawal depend, if any, must be recorded and annexed to the management plan.</td>
</tr>
<tr>
<td><strong>Finding :</strong></td>
<td>The company is clearly committed through its procedures to take this requirement into account and has well documented that there is no use of the CFAD by indigenous peoples. The development plans are old and do not describe the situation related to indigenous peoples.</td>
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<tr>
<td><strong>Observation :</strong></td>
<td>Observation :</td>
<td>If modifications to the development plans should take place in the future, this clause relating to the conditions of free consent of the Pygmy populations should be included.</td>
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<th>Standard &amp; requirement :</th>
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<tr>
<td><strong>Description of findings leading to observation :</strong></td>
<td><strong>Summary Requirement :</strong></td>
<td>The sanitary conditions of the employees and their families must respect the standards referred to in the legislation in force. The forest manager is required to take measures to ensure adequate hygienic and public health conditions (drinking water, latrines, garbage cans, etc.) sanitary structures must be provided and be functional with qualified medical personnel on site. Health facilities must be adequately supplied with medicines in accordance with the legislation in force. The forest manager must make practical arrangements to supply his workers with good quality products and foodstuffs according to local indicators.</td>
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<tr>
<td><strong>Finding :</strong></td>
<td>The company has installed fire extinguishers for each unit, which is good. However, it was noted by the auditors that these extinguishers are placed too high and therefore difficult to access for a small person unless standing on boxes, which was confirmed by Rougier Gabon who wants to avoid that children do not play with the extinguishers. The National Institute for Research and Security (INRS) recommends placing it 1.3 m from the ground.</td>
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<tr>
<td><strong>Observation :</strong></td>
<td>Observation :</td>
<td>Rougier Gabon must ensure that measures are taken to improve the positioning of fire extinguishers.</td>
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</table>
**OBS: 8.1.2/19**

**Standard & Requirement:** FSC Forest certification standard for Congo Basin – April 2012, indicators 8.1.2

**Report Section:** Annexe I

**Description of findings leading to observation:** The procedures, technical data sheets and work instructions are aging and the procedures identify the former designation for the position of RGFlo, that is to say the local planner. Likewise, the format of the work instructions is not standardized. Finally, the link between procedures, technical sheets and work instructions is not documented.

**Observation:** The company should update its documentary system for forest management.

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**OBS: 8.2.5/19**

**Standard & Requirement:** FSC Forest certification for Congo Basin – April 2012, indicators 8.2.5

**Report Section:** Annexe I

**Description of findings leading to observation:** Various shells were identified on the monitoring sheets revised during the audit. In particular, the sampling targeted monitoring forms for felling, for the construction and maintenance of civil engineering structures and for the construction of woodlots. Analysis of the impact of the identified shells indicates that they have no effect on the results of monitoring, particularly in the results presented in the CSR report. However, if data entry is not improved, this could lead to data quality problems.

**Observation:** The company should improve the quality of data collection during forest management monitoring.

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**OBS: 9.1.1/19**

**Standard & requirement:** FSC Forest certification for Congo Basin – April 2012, indicators 9.1.1

**Part of report:** Annexe I

**Description of findings leading to observation:** The standard does not prescribe deadlines for updating FHCV assessments including consultations with interested parties, however, given the long delay since the previous revision, an OBS 9.1.1 / 18 is issued to the effect that the FHCV study for Rougier Gabon should be updated.

**Observation:** The enterprise must update its analyses of FHCV to meet the process of total consultation.

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**OBS: 9.4.1/19**

**Standard & Requirement:** FSC Forest certification Standard for Congo Basin – April 2012, indicators 9.4.1

**Report Section:** Annexe I

**Description of findings leading to observation:** A threshold is included in the 2019 CSR document for each of the indicators monitored. When the threshold is exceeded, an analysis of the problem must be initiated. However, some thresholds are not appropriate and therefore the usefulness of the exercise is not clear to staff. This means that in 1 case, the threshold was exceeded without an analysis of the
problem having been carried out. This is not a non-compliance, as it is the threshold that seems inappropriate (too low).

**Observation:** The company should update the method of using the indicators in the CSR report to ensure that they are useful and that the follow-ups identify changes.

### 1.4 Stakeholder Consultation

The lead auditor contacted the stakeholders on September 11, 2019, from the list that was provided by Nepcon. In the meantime, an updated list had been requested from ROUGIER GABON.

Following the receipt of this additional list, a second email was sent by Philippe on October 13, 2019.

Once in the field, an administration and an NGO in Libreville were met. In Ogooué, an interview was possible with various administrations as well as the local populations of Nzanza, Mangoumba. Representatives of the people of Moyabi were also contacted by telephone.

<table>
<thead>
<tr>
<th>Type of stakeholders (NGO, governmental institutions, local residents, sub-contractors, etc.)</th>
<th>Stakeholders notified (#)</th>
<th>Stakeholders consulted directly or given an information (#)</th>
</tr>
</thead>
<tbody>
<tr>
<td>National /international NGO</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Local / regional NGO</td>
<td>6</td>
<td>2</td>
</tr>
<tr>
<td>Local community members</td>
<td></td>
<td>19</td>
</tr>
<tr>
<td>Governmental Institution</td>
<td>20</td>
<td>4</td>
</tr>
<tr>
<td>Union</td>
<td></td>
<td>2</td>
</tr>
<tr>
<td>Certified Entreprises</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Principle/Thematic domain</th>
<th>Comments from stakeholders :</th>
<th>NEPCon response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>P1 : Engagement in favor of FSC respect for legality</strong></td>
<td>None reported</td>
<td></td>
</tr>
<tr>
<td><strong>P2 : Tenure rights, usage rights and responsibilities</strong></td>
<td>No element reported.</td>
<td></td>
</tr>
<tr>
<td><strong>P3 - Rights of indigenous peoples</strong></td>
<td>No element reported.</td>
<td></td>
</tr>
<tr>
<td><strong>P4 : Community relations and rights of workers</strong></td>
<td>Some stakeholders recommended paying attention to the hiring, living and working conditions of employees as well as to the implementation of article 251 of the Gabonese forest code as well as the real existence of the contractual specifications signed by the various</td>
<td></td>
</tr>
</tbody>
</table>
forest code concerning local populations, the actual existence of contractual charges signed by the various stakeholders and tangible evidence of their implementation, and finally the tangible existence of community development projects. Other stakeholders reported that workers were escorted away from bus stops after work. Stakeholders and the tangible proof of their implementation, and finally the tangible existence of the projects have been verified by the auditor which gave rise to RNC 4.1.6 and 4.1.7 / 19, 4.2.9 / 19, 4.3.1 / 18 and to 4.2.2 / 19.

On the other hand, the fact that the workers were left at the edge of the road far from the bus stops could not be confirmed during triangulation.

<table>
<thead>
<tr>
<th>P5 : Bénéfices générés par la forêt</th>
<th>None reported</th>
</tr>
</thead>
<tbody>
<tr>
<td>P6 : Impact environnemental</td>
<td>Some workers said that the price of meat in the Ivindo store is higher than in the town of Booué After having compared with the official merchants of Booué, it turns out that several products, in particular certain meats, are sold at a price lower than the Ivindo commissary. The certificate holder has an agreement with the commissary owner to ensure that the prices of these products are kept at levels comparable to cities.</td>
</tr>
<tr>
<td>P7 : Management Plan</td>
<td>None reported</td>
</tr>
<tr>
<td>P8 : Monitoring and evaluation</td>
<td>None reported</td>
</tr>
<tr>
<td>P9 : Maintenance of High Conservation Value</td>
<td>None reported</td>
</tr>
<tr>
<td>P10 - Plantations</td>
<td>None reported</td>
</tr>
</tbody>
</table>
2. AUDIT PROCESS

2.1 Certification Standard used

<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Adaptation: (if applicable)</td>
<td>No changes to the standard.</td>
</tr>
</tbody>
</table>

2.2 Audit Team

<table>
<thead>
<tr>
<th>Name</th>
<th>Role et qualifications</th>
</tr>
</thead>
<tbody>
<tr>
<td>Philippe CASANOVA</td>
<td>Lead Auditor</td>
</tr>
<tr>
<td></td>
<td>Philippe graduated from the Montpellier Business School in International Business and an MBA from the University of Mannheim (Germany) in international economic relations and development policies.</td>
</tr>
<tr>
<td></td>
<td>He has 27 years of experience in managing international teams and 15 years of experience in Audit and development projects in Africa and Asia.</td>
</tr>
<tr>
<td></td>
<td>For 10 years, he imported wood and bamboo products from Fair Trade, worked for the international subsidiary of the National Office of Forests (FRANCE) as Tender Manager, managed 5 teams of experts for the support for African countries in the preparation of COP 21, and finally managed the FLEGT Independent Audit in Congo Brazzaville.</td>
</tr>
<tr>
<td></td>
<td>He is now an independent consultant and PEFC / FSC COC and FSC FM auditor.</td>
</tr>
<tr>
<td>Ugo LAPOINTE</td>
<td>Witness and auditor</td>
</tr>
<tr>
<td></td>
<td>Ugo is a consultant in forest ecology and sustainable forestry and senior auditor for NEPCon and holds a management position at SmartCert. Prior to that, he held the position of FSC certification coordinator in Canada and worked in the field of scientific research in forest ecology. Holder of a master's degree in the impact of forest management on wildlife, Ugo participated in the FSC auditor training from Rainforest Alliance for forest management and for the chain of custody, as well as ISO 14001, ISO 9001 and ISO 17021.</td>
</tr>
<tr>
<td>Armel TSIBA-NGOLO</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Armel is a Forest Technical Engineer and holds a Research Master in Sustainable Forest Management. In 2011, he worked at Rougier (Mokabi S.A.) as Social Manager. Then returned in 2012 to the international NGO ACTED, as AME Monitor and investigator for a study of the impact of logging on populations under the FLEGT VPA. He then worked with the Independent Observer APV-FLEGT in the Republic of Congo. Then returned to the APLE FLEGT Support Project as Assistant Technical Assistant for the support component for forestry companies with TEREA (2016-2018).</td>
</tr>
</tbody>
</table>
also attended several training courses related to sustainable forest management, in particular in social forestry as part of the Social Center of Excellence for Congo Basin (CES) project in 2009, in an audit organized by the Rainforest Alliance in 2013, in forest governance in 2014 in Kumasi, Ghana, and in Sustainable Development in 2015. He also received additional training in public-private partnership organized online by the World Bank in 2016. He participated both as local expert and auditor in the context of legality and sustainable forest management certifications. For this audit, Armel Lead auditor and looks at legal and environmental aspects.
1.1 Presentation of audit

Note: The table below presents an overview of the scope of the application and/or the auditors. Consult the reference in the annex for specific details on the persons considered.

<table>
<thead>
<tr>
<th>Site(s)</th>
<th>Date(s)</th>
<th>Main activities</th>
<th>Auditor(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ivindo</td>
<td>22 to 24 October 2019</td>
<td>Document review, site visit, staff interview, meeting with local population, meeting with stakeholders.</td>
<td>Philippe CASANOVA</td>
</tr>
<tr>
<td>Ivindo</td>
<td>22 to 24 October 2019</td>
<td>Witness and accompany de Philippe CASANOVA, visit to the buffer zone.</td>
<td>Ugo LAPOINTE</td>
</tr>
<tr>
<td>Ivindo</td>
<td>22 to 24 October 2019</td>
<td>Document review, site visit, staff interview, technical assistance with lead auditor.</td>
<td>Armel TSIBA-NGOLO</td>
</tr>
</tbody>
</table>

Total number of man-days used: 9 Days for preparation, onsite audit, stakeholder consultation.
1.2 Description of global audit process

Philippe arrived in Libreville on 20/10/2019 in the evening because he was to conduct the COC audit of ROUGIER GABON on the 21st.

Certain elements, concerning the COC and the use of brands were collected on this occasion before the start of the FM audit of Ogooue Ivindo scheduled for October 22 to 26, 2019. Philippe was joined by Armel on the evening of the 21st.

Two ASI observers were present from the evening of the 21st or the morning of the 22nd and participated in the opening meeting in Libreville with Philippe and Armel.

However, UGO, whose flight was canceled, did not arrive in Libreville until the evening of the 22nd.

On the 22nd Philippe and Armel conducted the documentary review and interviewed the staff in Libreville. Armel met with the unions that met at the Owendo site.

Philippe also met with stakeholders on Libreville: the CNAMGS administration and the NGO BRAINFOREST.

On the morning of the 23rd, the whole team set out for Ivindo. The car journey lasted all day.

On arrival (which continued the following day) the roads, structures (bridges) were analyzed.

On the morning of the 24th, the opening meeting was held at the Ivindo site with company officials.

The entire team began the document review and staff interviews. Philippe and Ugo met the stakeholders on Booué (Prefecture, Department Council, forest administration) as well as local populations (Inzanza). This last meeting was unexpectedly organized. It was possible to locate and meet the village chief accompanied by an official.

On return, access to the CFAD (blocked roads) was analyzed.

In view of the lack of a railcar, it was not possible to organize a trip to meet the populations of MOYABI. However, Philippe was able to establish telephone contact and conduct an interview. Meanwhile Armel interviewed different people in the companies (unions, HR, etc.) and analyzed the documents.

On October 25, Philippe continued the interviews with the local populations by going to meet the Mangomba village bordering the Ivindo site. A meeting (organized) with many people from the village was held, followed by a visit to the village, the village chief and the notables wishing to show their sanitary conditions to the auditors. In the afternoon, analysis of documents and interviews with Eric Chezeaux (the various legality indicators, taxes and charges, as well as social indicators, subcontracting, keeping of forest statistics, document models, etc.) as well as with the external social team were carried out.

Armel continued the interviews and visited the site to analyze internal social, security and health aspects.
The 26th was planned to spend half a day to ¾ days in the forest on the production site, but very heavy rain prevented displacement and the operating personnel could not go to the site. As a result, Armel and Philippe, accompanied by Ugo, interviewed the staff. The infirmary, the store and the stock were also visited.

On the evening of the 26th were held both the closing meeting with the site management, a meeting of Witnesses between Philippe and Ugo, and a meeting between Philippe, Ugo and the ASI team to close the sighting.

1.3 Changes made by the FME in forest management and the impacts on the conformity to the standard requirements.

No changes in the context of forest manager.

<table>
<thead>
<tr>
<th>Name of FMU</th>
<th>Justification for selection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ogooué-Ivindo</td>
<td>Each CFAD is certified separately.</td>
</tr>
</tbody>
</table>

1.3.1 Examination of documents and data required

a) All types of certificates

<table>
<thead>
<tr>
<th>Documents required</th>
<th>Examined</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complaints received by stakeholders, actions taken, follow up of correspondence</td>
<td>Yes X No</td>
</tr>
<tr>
<td>Comments : the only complaints are from the local population who cannot see sufficient social impact of the actions of the enterprise. This constitutes an NCR.</td>
<td></td>
</tr>
<tr>
<td>Supporting documents</td>
<td>Yes X No</td>
</tr>
<tr>
<td>Comments :</td>
<td></td>
</tr>
<tr>
<td>Training Documents</td>
<td>Yes X No</td>
</tr>
<tr>
<td>Operation Plan(s) for the next 12 months</td>
<td>Yes X No</td>
</tr>
<tr>
<td>Comments : Tableau complet 2019-08-reporting ROG.xls</td>
<td></td>
</tr>
<tr>
<td>Inventory Documents</td>
<td>Yes X No</td>
</tr>
<tr>
<td>Comments :</td>
<td></td>
</tr>
<tr>
<td>Harvesting Documents</td>
<td>Yes X No</td>
</tr>
<tr>
<td>Comments : Tableau complet 2019-08-reporting ROG.xls</td>
<td></td>
</tr>
</tbody>
</table>
## 2 INFORMATION ON THE ENTERPRISE

### 3.1.1 Description of scope of application

<table>
<thead>
<tr>
<th>Period covered by the audit report:</th>
<th>Period covering the previous 12 months</th>
<th>Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Period covering the previous 12 months</td>
<td>September 2019 - October 2020</td>
</tr>
</tbody>
</table>

### A. Scope of application of the forest zone

<table>
<thead>
<tr>
<th>X No changes since the previous report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of certificate: single FMU</td>
</tr>
<tr>
<td>Certificat PEFFFI (SLIMF) Not applicable</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Groupe or several FMU</th>
<th>Number of members (if applicable):</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total number of forest management units:</td>
</tr>
<tr>
<td></td>
<td>(if applicable, mention each one below):</td>
</tr>
<tr>
<td></td>
<td>Classification of size of FMU covered by the scope of application:</td>
</tr>
<tr>
<td></td>
<td># FMU</td>
</tr>
<tr>
<td>&gt; 10 000 ha</td>
<td></td>
</tr>
</tbody>
</table>

**New FMU added since previous audit?**

- Yes ☐
- No ☐
- NA ☐

**Groupe Certificate**: List of FMU covered by the scope of the application of the certificate provided in Annexe VII-a:

<table>
<thead>
<tr>
<th>Single / multiple FMU Certificate:</th>
<th>List of each FMU covered by the scope of the application:</th>
</tr>
</thead>
<tbody>
<tr>
<td>FMU Name/Description</td>
<td>Surface (ha)</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### B. Categories of FSC products covered by the scope of the application of the FM/Coc certificate

<table>
<thead>
<tr>
<th>X No change since previous audit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level 1</td>
</tr>
<tr>
<td>W1 Bois brut</td>
</tr>
<tr>
<td>W2 Charbon à bois</td>
</tr>
<tr>
<td>W3 Bois en copeaux ou particules</td>
</tr>
<tr>
<td>W5 Bois solide (sciés, copeaux, tranchés ou déroulés)</td>
</tr>
<tr>
<td>Produits forestiers non ligneux N1 Écorces</td>
</tr>
<tr>
<td>Autres</td>
</tr>
</tbody>
</table>

### Notes

1 Les données présentées dans ce rapport sont exprimées en unités du système métrique
C. Species and sustainable harvest rate (AAC)

<table>
<thead>
<tr>
<th>Species</th>
<th>Annual cutting limit (m³)</th>
<th>Harvested Volume (m³)</th>
<th>Annual cutting limit (m³)</th>
<th>Harvested Volume (m³)</th>
<th>Annual cutting limit (m³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aucoumea klaineana</td>
<td>OKOUME</td>
<td>47499</td>
<td>49728</td>
<td>85958</td>
<td></td>
</tr>
<tr>
<td>Paraberlinia bifoliata</td>
<td>BELI</td>
<td>9078</td>
<td>12314</td>
<td>3435</td>
<td></td>
</tr>
<tr>
<td>Pterocarpus soyauxii</td>
<td>PADOUK</td>
<td>10549</td>
<td>3841</td>
<td>7474</td>
<td></td>
</tr>
<tr>
<td>Erythrophleum ivorense</td>
<td>TALI</td>
<td>4497</td>
<td>1055</td>
<td>2834</td>
<td></td>
</tr>
<tr>
<td>Khaya ivorensis</td>
<td>ACAJOU</td>
<td>367</td>
<td>117</td>
<td>524</td>
<td></td>
</tr>
<tr>
<td>Lophira alata</td>
<td>AZOBE</td>
<td>5105</td>
<td>5355</td>
<td>5556</td>
<td></td>
</tr>
<tr>
<td>Guarea cedrata</td>
<td>BOSSE CLAIR</td>
<td>100</td>
<td>249</td>
<td>212</td>
<td></td>
</tr>
<tr>
<td>Lovoa trichilioides</td>
<td>DIBETOU</td>
<td>662</td>
<td>416</td>
<td>525</td>
<td></td>
</tr>
<tr>
<td>Afzelia bipindensis</td>
<td>DOUSSIE BLANC</td>
<td>61</td>
<td>117</td>
<td>111</td>
<td></td>
</tr>
<tr>
<td>Berlinia bracteosa</td>
<td>EBIARA</td>
<td>713</td>
<td>0</td>
<td>618</td>
<td></td>
</tr>
<tr>
<td>Chlorophora excelsia</td>
<td>IROKO</td>
<td>92</td>
<td>78</td>
<td>218</td>
<td></td>
</tr>
<tr>
<td>Testulea gabonensis</td>
<td>IZOMBE</td>
<td>281</td>
<td>147</td>
<td>108</td>
<td></td>
</tr>
<tr>
<td>Cylicodiscus gabunensis</td>
<td>OKAN</td>
<td>8210</td>
<td>4851</td>
<td>9135</td>
<td></td>
</tr>
<tr>
<td>Swartzia fistuloides</td>
<td>PAO ROSA</td>
<td>66</td>
<td>9</td>
<td>11</td>
<td></td>
</tr>
<tr>
<td>Entandrophragma cylindricum</td>
<td>SAPELLI</td>
<td>608</td>
<td>351</td>
<td>368</td>
<td></td>
</tr>
<tr>
<td>Entandrophragma utile</td>
<td>SIPO</td>
<td>267</td>
<td>125</td>
<td>210</td>
<td></td>
</tr>
<tr>
<td>Milletia laurentii</td>
<td>WENGE</td>
<td>30</td>
<td>0</td>
<td>105</td>
<td></td>
</tr>
<tr>
<td>Nauclea diderrichii</td>
<td>BILINGA</td>
<td>326</td>
<td>122</td>
<td>293</td>
<td></td>
</tr>
<tr>
<td>Total AAC</td>
<td></td>
<td><strong>88511</strong></td>
<td><strong>78875</strong></td>
<td><strong>117695</strong></td>
<td></td>
</tr>
</tbody>
</table>

Estimation totale de la production annuelle de grumes (m³) : 158576
Estimation totale de la production annuelle de PFNL certifiés :
(Répertoriez tous les PFNL certifiés par type de produit) :

The volumes of the AAC are given in the 2019 budget, and the achievement is the synthesis at the end of September 2019
The forecast volume is that of the budget prepared for the year 2020 (slight increase compared to 2020)

The estimate of annual production comes from the two management plans of the two FMUs in operation (catching up with the delay in the implementation of the management plan)

### D. Informations on FME

<table>
<thead>
<tr>
<th>Forest Zone</th>
<th>Subtropicale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certified area (ha) by type of forest</td>
<td>282 030 ha</td>
</tr>
<tr>
<td>- Natural</td>
<td></td>
</tr>
<tr>
<td>- Plantation</td>
<td></td>
</tr>
<tr>
<td>Berges de cours d'eau et plans d'eau (km linéaire)</td>
<td></td>
</tr>
</tbody>
</table>

### E. Classification of forest zone (ha)

- Total certified area: 282 030 ha
- Total forest area covered by the scope of the certificate: 282 030 ha
- Land right management:
  - State property
  - Private management

<table>
<thead>
<tr>
<th>Forest area</th>
<th>282 030 ha</th>
</tr>
</thead>
<tbody>
<tr>
<td>Managed by private interests</td>
<td></td>
</tr>
<tr>
<td>Managed by state/public institution</td>
<td></td>
</tr>
<tr>
<td>Managed by community</td>
<td></td>
</tr>
<tr>
<td>Forest production area (zones for wood harvesting)</td>
<td>251 092 ha</td>
</tr>
<tr>
<td>Zones without harvesting activity or management: strictly forest reserves</td>
<td>30 938 ha</td>
</tr>
</tbody>
</table>

### F. Regeneration of the forest

- No change since previous report

<table>
<thead>
<tr>
<th>Area or proportion of total area of naturally regenerated production forests</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Area or proportion of the total area of production forests regenerated by planting or seeding</td>
<td></td>
</tr>
</tbody>
</table>

### G. High conservation values identified by FME using formal HCV assessment and related areas

- No change since previous report

<table>
<thead>
<tr>
<th>Code</th>
<th>Types of HCV²</th>
<th>Description :</th>
<th>Area (ha)</th>
</tr>
</thead>
</table>

² La classification et la numérotation des HVC respecte la boîte à outils de ProForest sur les FHVC. La boîte à outils fournit également des explications supplémentaires sur les catégories de HVC. La boîte à outils est disponible à l'adresse http://hcvnetwork.org/library/global-hcv-toolkits.
| HVC1 | Forest areas containing concentrations of biodiversity values of global, regional and national significance (e.g., endemism, endangered species, refuge areas) | Buffer Zones of the Ivindo National Park Of which 200m total in conservation 6 blocks representative of the types of forests série de protection des marécages ouverts et raphiales mountainous zones de montagnes | 57 400ha 2869 ha 3 272 ha 5 872 ha 4 910 ha |
| HVC2 | Forest areas containing large, globally, regionally or nationally important landscape forests contained or contained in the management unit, where viable populations of most, if not all, natural species exist in natural patterns distribution and abundance. | IFL Forests in conservation | 15 268 ha 2600 ha in conservation |
| HVC3 | Forest areas that contain or contain rare, threatened or endangered ecosystems. | Idem 1 |
| HVC4 | Forest areas that provide basic ecosystem services in critical situations (protection of water catchment areas and control of erosion). | In protection along the banks of Ivindo, Mvoung, Lévi, Mazinano, Dilo, Niandou, Mvoung, Toho, Mvogo, and other rivers (100 m on the other part) | 17 723 ha |
| HVC5 | Basic forest areas for meeting the basic needs of local communities (livelihoods, health) | Some hunting and fishing zones in the villages of Mangomba, Mouyabi and Dji Dji Série à usage des populations d’OVAN | Env 19 500ha 2 416 ha |
| HVC6 | Forest areas fundamental to the traditional cultural identity of local communities (sites of cultural, ecological, economic or religious importance, identified in collaboration with such communities) | Some ancient human settlement zones in the villages of Mangomba, Mouyabi and Dji Dji |

| TOTALE AREA FHCV | About 120 000 ha |

Number of sites of importance to indigenous peoples and local communities

**H. Use of pesticides**

X The FME does not use pesticides.
### 3.1.2. Exclusion de zones from the scope of application of the certificate

<table>
<thead>
<tr>
<th>X</th>
<th>Partial applicability of FSC certification FSC and the policy of excision</th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td>All forests belonging to or managed by the FME are included in the scope of this audit.</td>
</tr>
<tr>
<td></td>
<td>The FME owns and / or has management activities in other unaudited land / forest properties (forest management units). If yes, complete all of the parts below.</td>
</tr>
<tr>
<td></td>
<td>Is part of the forest management unit (s) being audited excluded from the scope of certification? If yes, complete all of the parts below. Compliance with policy FSC-POL-20-003 “Excision of areas of the scope of certification” is documented.</td>
</tr>
<tr>
<td>Comments / Explanations on exclusion/excision:</td>
<td></td>
</tr>
<tr>
<td>Control Measures to prevent contamination</td>
<td>Other forestry area</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
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3 AUDIT AND FINDING OF NON-CONFORMITIES

1.1 Audit Context

Has the management system changed since the last evaluation? Oui ☐ Non ☒

If yes, briefly summarize the changes:

Have there been any complaints, conflicts or accusations of non-compliance with the standard against the Organization during the audit period? Oui ☐ Non ☒

If yes, refer to the standard and criterion for which relevant findings are found in the report:

1.2 Evaluation of open non-conformities (NCR)

**Note:** This section describes actions performed by the Organization to respond to RNCs issued during the last audit (or since). Failure to comply with a minor CAR results in transformation to a major CAR; the defined follow-up action is mandatory for the Organization or an involuntary suspension will take place.

<table>
<thead>
<tr>
<th>Status Categories</th>
<th>Explanations</th>
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<tr>
<td>CLOSED</td>
<td>The Organisation has satisfied the NCR successfully</td>
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<tr>
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<td>The Organisation has not satisfied or partially satisfied the NCR.</td>
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<th>Classement de la NC :</th>
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<td>Norme &amp; Exigence :</td>
<td>Annexe IV</td>
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**Description de la non-conformité et preuves associées :**

Summary of Requirement:
The forest manager must prove that he has effective procedures which ensure that the subcontractors and other managers of forest operations on the concession comply with all the legal requirements in force.

Finding:
The auditors noted that Rougier Gabon had procedures to prevent the risks of non-compliance with the requirements by its subcontractors, but that they were not always applied.

On January 23, 2018, Rougier Gabon implemented a "charter of subcontractors, service providers, service providers for Rougier Gabon" code PROC / SYS / 23.

However, the Rougier Gabon company uses the services of the PRIMA security company on several sites. For each site, Rougier Gabon should therefore be able to produce a contract accepted by the subcontractor and taking up the following commitments as provided for by its procedure:
- compliance with health and safety instructions;
- the prohibition of forced labor and the employment of children;
- the supply of PPE;
- the implementation of emergency procedures;
- environmental protection (waste management, hunting rules, water pollution, chemicals, etc.);
- compliance with the internal regulations and the Rougier Gabon forestry convention;
- dissemination of the said charter to all staff and raising awareness.

There is a duly signed contract for the CFAD of Haut-Abanga and evidence of respect for legality by this company is collected, but for the CFAD of Ogooué-Ivindo Rougier Gabon could only produce a letter of provision.

Rougier Gabon staff said it was an emergency due to the failure of their previous provider. The Rougier Gabon managers indicated that they were preparing a multi-site contract with the PRIMA company containing annexes depending on the sites concerned.

The publication of this document is imminent.

These gaps lead to the issue of a minor NCR in indicator 1.1.8.

This NCR remains minor, because the gap is not systemic and that Rougier Gabon staff seemed to be aware of the need to quickly remedy it.

Evidence considered:
- Field visits
- Discussions with workers and managers

Corrective action required:
The organization shall implement corrective actions to demonstrate compliance with the requirement(s) listed above.

Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

Deadline for conformity: In the 12 months following the date of finalisation of report

Evidence provided by organisation:
- Note Adm Subcontractor V3
- Global Transport file
- Okoumé Transport file
- Prima file

Findings following evaluation of evidence:
ROUGIER GABON has implemented procedures to verify that its subcontractors meet the requirements of the standard.

It sends letters to its subcontractors to request supporting documents and updates it twice a year. The subcontracting files presented to the auditor (see attachment) include CNAMGS receipts, circuit sheets, signed contracts, agent registration, list of trucks and drivers, insurance.

The company therefore has effective procedures which ensure that the subcontractors and other managers of forest operations on the concession comply with all the legal requirements in force, the requirement is thus satisfied.

Status of NCR: CLOSED

Comments (facultatifs):
Description of non-conformity and associated evidence:

Summary of Requirement:
Indicator 1.2.4: The proofs relating to the payment of the taxes must be preserved and their calculation documented.

Finding:
First of all, it should be noted that the Rougier group holds the Haut Ogooué forest licenses (Moyabi and Leké) through the CIFHO company, which is a legal entity of Rougier Gabon (the same legal entity cannot hold more than 600,000 ha of concession).

By wanting to check whether Rougier Gabon was up to date with the payment of taxes, the auditors noted a system of compensation for taxes due and APE credits which included the legally separate company CIFHO. Rougier Gabon operates CIFHO concessions through a rental contract duly validated by the administration and is therefore liable to pay taxes on behalf of CIFHO in this respect.

Nevertheless, the document presented to the auditor certainly stipulates that "the forest taxes relating to the permits that allow CIFHO to create the FMU No 1 and FMU No 2 are payable by the Rougier Gabon who is obliged to do so" but "With the exception of the surface tax which remains chargeable to CIFHO."

So a priori the CIFHO area tax should not appear in this compensation system. However, in the accounting situation of the APE Credit produced by Rougier Gabon appears on 31/03/18 a compensation for CIFHO area tax for an amount of FCFA 117,164,800.

During the auditors' discussions with the departments concerned, Rougier Gabon affirmed that the tax inspector had made the same remark without leading to an adjustment. Rougier Gabon presented a letter from the Tax Administration (reference 035 / MEPPDD / SG / DGI / DVF / SVNI) proving that the heads of redress concerning the rental contract were abandoned by the administration. There remains only one tax point linked to the administrative allowances of administrators for CIFHO and for which they have paid the sum of 2,213,855 FCFA (1,475,903 in law and 737,952 in penalties following administrative allowances for administrators without contract with CIFHO).

Another document provided ref. 0073/2018 / PB PPE dated February 8, 2018 on CIFHO header paper declares the area tax for the 2 CFADs concerned and requests the allocation to the APE credit of Rougier Gabon.

Various letters from the tax administration (ex letter of April 7, 2017 ref. N ° 973 MEPPDD / SG / DGI / DGE / SGC) demonstrate the acceptance of this compensation method.

CIFHO therefore becomes liable for the amount of the surface tax vis-à-vis Rougier Gabon, which is recorded in a cash account.

Another APE loan in the amount of 1,167,624,690 FCFA dating from 2013 (agreement no. 241 002-03-015 / DGD / ROUGIER GABON, the reimbursements of which by third parties have been slow to be paid by the State also appear in the accounts.

Given the complexity of the system and the risk of confusion between two separate legal structures, the method for calculating taxes and their payment must be clearly documented.
**Evidence:**
- Interviews with Rougier Gabon staff
- Rental contract
- Letter following the tax audit of the company
- Letters with the administration on tax compensation.
- Account statements

<table>
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<tr>
<th>Corrective action required :</th>
<th>The organization shall implement corrective actions to demonstrate compliance with the requirement (s) listed above. Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.</th>
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<td><strong>Deadline for conformity :</strong></td>
<td>Until next annual audit</td>
</tr>
<tr>
<td><strong>Proof provided by organisation</strong></td>
<td>ROUGIER GABON presented a Forest wood social taxation 2019 file. In addition, an Excel file Taxes2019.xls contains the list of taxes with their calculation method and the balance.</td>
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<tr>
<td><strong>Findings following evaluation of evidence:</strong></td>
<td>ROUGIER Gabon has clearly documented the calculation of taxes and their balance and presented files with elements relating to regulations. Evidence relating to the payment of taxes is well preserved and their calculation documented thus satisfying the requirements of this indicator.</td>
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30 FSC FM Audit Report
# NCR | Classification of NC | Major | Minor X
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1.2.7/18 | FSC Forest certification standard for Congo Basin– April 2012, indicator 1.2.7. | | |
Section du rapport : | Annexe IV |

**Description of non-conformity and associated evidence :**

**Summary Requirement :**
Indicator 1.2.7: Forest managers publish the entire status of the taxes and fees to which they are subject.

**Finding:**
It appears that the status of taxes and fees to which the company is subject is not published as required by the indicator. The explanation provided by Rougier Gabon is that given the financial difficulties and the restructuring of the group they do not have been up to date in the content of the website, but that this will change soon (desired before the end of the year). Rougier Gabon realizes that they should not only publish the tax situation, but also report the commitment to the FSC on the Rougier Gabon website. This problem similar to that described in NCR 8.5.1 / 18

**Evidence:**
- Interviews with Rougier Gabon staff
- website [www.rougier.fr](http://www.rougier.fr)

**Corrective action required :**
The organization shall implement corrective actions to demonstrate compliance with the requirement (s) listed above. Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

**Deadline for conformity :**
Until next annual audit

**Evidence provided by organisation :**
Organization’s website
Interviews with staff of Organisation

**Findings following evaluation of evidence :**
ROUGIER Gabon has added a new sub-section in "Afrique International / Engagements" on the website [www.rougier.fr](http://www.rougier.fr) where a paragraph relating to taxes is included

The requirement is therefore met, since the tax situation is published.

**Status of NCR :**
CLOSED

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# NCR | Classification of NC | Major | Minor X
--- | --- | --- | ---
2.3.5/18 | FSC Forest certification standard for Congo Basin– April 2012, indicator 2.3.5. | | |
Section du rapport : | Annexe IV |

**Description of non-conformity and associated evidence :**
Summary of Requirement:
Indicator 2.3.5 The neighboring communities acknowledge that they have been informed beforehand about all the procedures for resolving conflicts related to the exercise of their rights of use before freely giving their consent and are able to describe these procedures.

Finding:
The different communities met by the auditors show strong dissatisfaction with Rougier Gabon, which has been slow to resolve the problems linked to the application of decree 105 (FDL).

This feeling is reinforced by the fact that Rougier Gabon did not send a letter acknowledging receipt, setting a response time, or a specific and reason for refusal to a written request from the population. The communities are not always able to describe in detail the procedures for resolving conflicts, but generally indicate that they have been informed. Some people can certainly indicate that they were not informed of the complaints process, but the level of information may be different within a community and the Rougier Gabon social team was able to produce signed minutes indicating that meetings had been successfully carried out with said communities.

On the other hand, the latter are insufficiently informed of the usefulness of producing a letter instead of an oral claim. For example, two villages complain about the use of their resources (gravel, sand) by Rougier Gabon without collective financial compensation, but do not seem to have a written record of their dissatisfaction. The complaints management process must be amended to avoid misunderstanding by the communities regarding the proper consideration of their claims.

Evidence:
- Interviews with Rougier staff
- Visits to communities.
- Review of the filing of grievances / complaints, and review of complaints management procedures.

Corrective action required: The organization shall implement corrective actions to demonstrate compliance with the requirement (s) listed above. Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

Deadline for conformity: D’ici au prochain audit annuel

Evidence provided by organisation: The ROUGIER GABON company provided proof of sensitization of the populations on the new complaints policy within the framework of the FDL (external social file see evidence in PJ).

Findings following evaluation of evidence:
However, following
• the testimony of the population of Inzanza interviewed by the auditor,
• triangulation with the Rougier Gabon external social team
• the analysis of the external social file cabinet;

It appeared that the populations relating to the old social policy of Rougier (and who are not FDL) were not sensitized.

The NC remains open and becomes a Major with a 3 month schedule. See section 1.2 of this report for NC Major.

Status of NCR: OPEN

Comments (facultatifs): See section of present report
## Description of non-conformity and associated evidence:

### Summary of Requirement

The standard requires that the forest manager takes preventive measures to minimize work accidents related to forestry operations. Working conditions must be in line with the labor code and ILO recommendations. There should be rules and procedures that should be distributed to employees to make them aware of the need to meet safety standards. Appropriate safety equipment must be distributed to workers and workers must wear it when they are at their respective work stations. Workers must take medical examinations in accordance with national laws.

### Finding:

In accordance with the procedure for periodic medical examinations in force (PROC OP RH 004), workers on forestry sites must take a summary medical examination twice a year (Semi-annual visits). For financial reasons, the first summary medical visit took place at the beginning of September 2018 and the second is scheduled for November 2018.

The report of this annual visit is not yet available but all the Rougier Gabon employees assigned to the FMU Kouma have not passed this compulsory visit (See Art 210 of the labor code), have not received any request for an explanation to this effect for those absent and no additional plan of visit was presented to the auditors in accordance with the procedure.

### Evidence considered:

- Report of medical visits from 09 to 12/09/2018;
- Staff interview;
- Labor Code.

### Corrective action required:

The organization shall implement corrective actions to demonstrate compliance with the requirement (s) listed above. Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

### Deadline for conformity:

In the 12 months following the date of finalization of report

### Evidence provided by Organisation:

- Interview of nurses
- Interview QHSSE team
- Medical exam reports for march, August and septembre de 2019.

### Findings following evaluation of evidence

Regarding medical visits, there has been improvement and the problem has been resolved. However, two observations made during the audit contribute to raising this non-compliance to major.

1) PPE was out of stock and according to interviews with workers and company executives, some workers including chainsaw operators worked without having all the personal protective equipment required by law and by the procedures of the company.
2) At the time of the audit, the evacuation vehicle for the forest was broken down and under repair. The personnel vehicle was the temporary vehicle but is not suitable for this function. Auditors conclude that these findings point to a collapse of the system as workers are trained to work with PPE they did not receive.

The NC remains open and becomes a Major with a 3 month schedule. See section 1.2 of this report for NC Major.

### Status of NCR:
- **OPEN**

### Comments (optional):
See section 1.2 of present report

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<td>Section of report :</td>
<td>Annexe IV</td>
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#### Description of non-conformity and associated evidence:

#### Summary of Requirement:

The standard requires that the sanitary conditions of employees and their families comply with the requirements referred to in the legislation in force. The forest manager is required to take measures to ensure adequate hygiene and public health conditions (drinking water, latrines, garbage cans, etc.) health structures must be provided and be functional with qualified medical personnel on site. Health facilities must be adequately supplied with medicines in accordance with the legislation in force. The forest manager must make practical arrangements to supply his workers with good quality products and foodstuffs according to local indicators.

#### Finding:

The Rougier Gabon staff of the CFAD of l'Ogooué Ivindo is housed at the Ivindo site, The dwellings of the Control Agent (AM) staff housed in the Essengo camp present security risks because out of the 23 houses in this camp which are placed on wooden logs, 15 have logs whose state of advanced rotting constitutes a risk for the inhabitants of these houses.

#### Evidence considered:

- Ivindo base-visit;
- Interview with residents of the base camp;

#### Corrective action required:

The organization shall implement corrective actions to demonstrate compliance with the requirement(s) listed above. Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

#### Deadline for conformity:

Dans les 12 mois suivant la date de finalisation du rapport

#### Evidence provided by l’Organisation:

- HSE-SST action plan
- Internal QHSE pre-audit report of 09/24/2019
- Visit to the housing of workers in general and of particular supervisors in the ESSENGO district
- Interactions with the HSE team
- Interactions with nurses
- Interactions with the economat manager
Findings after evaluation of evidence:

Following the request for a minor corrective action on the deterioration of the pilings of the housing of foremen of the ESSENGO camp, the management of the Ogoué-Ivindo site replaced the rotten logs with new logs in order to secure the housing of the camp supervisors.

In addition, the auditors toured the entire camp and found that the company, through the new site director, is in the process of repairing the drainage system for dirty water. The living environment is clean and marked so that pedestrians and vehicles do not cross each other. The markup is materialized by the vertical signaling which clearly indicate passages for vehicles and pedestrians.

In fact, improvements are continuing on all the installations at the Ivindo site, in particular the storage of soil in fitted tanks, the storage of used oil filters in the tanks, the recovery and conditioning of waste oil and maintenance decanters and sludge separators.

Status of NCR: CLOSED

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<td>Description of non-conformity and associated evidence et pièces justificatives:</td>
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**Summary of Requirement:**

The standard requires that the forest manager ensures that all employees and subcontractors have subscribed to social insurance (or its equivalent) in order to provide compensation and / or continuous support in the event of layoffs or injuries at work.

**Finding:**

All Rougier workers are registered with the CNSS, and the company ensures that subcontractors are registered and in good standing with this body via the quarterly declaration of wages which is part of the legality file updated annually.

However, Rougier Gabon did not provide auditors with proof of actual payment of social security contributions for its staff and that of its subcontractors for the years 2017 and 2018.

**Evidence considered:**

- Staff interview;
- Financial statements and proof of payment of taxes and fees for Rougier Gabon 2017 and 2018.

**Corrective action required:**

The organization shall implement corrective actions to demonstrate compliance with the requirement (s) listed above.
Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

<table>
<thead>
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<th>Deadline for conformity</th>
<th>Prochain audit annuel.</th>
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</table>
| Evidence provided by Organisation | • 2016-2017 and 2017-2019 moratoria on indebtedness;  
• 2019 moratorium on CNAMGS indebtedness  
• Interview with the Human Resources manager in Libreville  
• Table excel Taxes2019.xls  
• Interview of the Administrative and Human Resources Manager on the Ivindo site. |
| Findings following evaluation of evidence | Rougier Gabon had a difficult time due to cash flow concerns. This led them to indebtedness to public administrations in general, the CNSS and the CNAMGES in particular. They informed auditors that in order to remedy this situation of imbalance, they proceeded to the restructuring (reduction of the staff, of agents). Thus, as part of the regularization of its debt situation of previous years, Rougier Gabon proceeded by obtaining several moratoria with the CNSS and the CNAMGES. In order to ensure that this situation was followed up, the auditors checked the existence of proof of payment to the CNSS and the CNAMGES and exchanged with the administrations concerned. It turns out that the company is up to date with the payment of the deadlines set out in the moratoria. |
| Status of NCR | CLOSED |
| Comments (optional) | Due to the binding nature of the moratoriums obtained from the administrations of the CNSS and the CNAMGES, the auditors should monitor compliance with these moratoriums by Rougier Gabon. |

| # RNC | 4.3.1/18  
8 8 |
| Classification of NC: | Major | Minor X |
| Standard and article referenced | FSC Forest certification standard for Congo Basin– April 2012, indicator 4.3.1 |
| Section of report | Annexe IV |

**Description of non-conformity and associated evidence:**

**Summary of Requirement:**

The standard requires that all the prescriptions / provisions of the Labor Code and ILO conventions 87 and 98 be effectively implemented: The Labor Code and its enabling texts (a collective agreement for example) as well as the recommendations of the ILO, where applicable, must be respected. Salaries and benefits must comply with applicable national regulations. Employees must organize and negotiate freely with the forest manager. There must be a permanent and functional body representing the interests of workers.
### Finding:
Rougier Gabon ensures compliance with the Labor Code in the context of its activities. The personnel department at the General Management level (ZI OLOUMI) is well organized and has access to all applicable national and international laws, regulations and conventions.

In the field, each site has a ARHM (Administrative Relay & HR) for the close monitoring of workers.

The wages paid to staff correspond to the minimum wage set by the Labor Code and its implementing texts.

However, during the visit to the Kouma site, the auditors noted that certain workers had been performing functions different from those appearing on their pay slips for more than a year without being reclassified in the corresponding category.

### Evidence considered:
- Personal interview;
- Review of pay slips August 2018,

### Corrective action required:
The organization shall implement corrective actions to demonstrate compliance with the requirement (s) listed above.

Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

### Deadline for conformity:
In the 12 months following the date of finalisation of report

### Evidence provided by Organisation:
- HR mission report IVINDO Audit preparation October 2019
- Interviews with the HR manager, workers and managers.
- Staff pay slips
- Reclassification letters (example: N / REF: L.N ° 021/10/19 / NBS / AM)
- Trial sheet
- Employee situation change sheet
- List of workers trained for a new position

### Findings following evaluation of evidence:
At the time of the audit, the reclassification process was being implemented on the human resources side. Several workers had been upgraded to reflect the position they actually occupied. For workers who are transitioning from one job to another, a clear process has been developed that includes formal testing of the worker in the new job. Since the previous audit, 41 workers have been identified for reclassification to another position. This process is initiated when human resources are informed by managers in the forest of a change of function for a worker.

Interviews with forest managers, that is, the team leaders and the operations manager, show that they were not trained to identify job changes. In particular, they could not confirm when they would notify human resources in the classification process. In addition, they confirmed that some workers were not at their posts. Thus, the auditors conclude
that an important component of the process still remains to be done, that is to say to train the executives in the forest so that they are able to identify the changes of position.

The NC remains open and becomes a Major with a 3 month schedule. See section 1.2 of this report for NC Major.

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**Description of non-conformity and associated evidence :**

**Summary of Requirement :**

The standard requires that actions be taken to promote value-added processing of various forest species.

**Finding:**

At the time of the audit, Rougier Gabon had a very specific range of forest species being exploited and processed at its various production sites. The transformation levels applied are the first and the second transformation. In interviews, Rougier executives mentioned efforts they are making to diversify demand for the types of products produced by CFADs. However, there is no vision, budget and documented process to ensure that actions are taken to promote value-added processing of the various forest species from CFAD.

**Evidence considered:**

- Personal interview;
- CFAD production reports from Ogooué Ivindo;
Corrective action required: The organization shall implement corrective actions to demonstrate compliance with the requirement (s) listed above. Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

Deadline for conformity: Dans les 12 mois suivant la date de finalisation du rapport

Evidence provided by Organisation:
- Request for authorization to exploit promotional species and approval by the administration (dating from 2015).
- Resources in promotional species by plot.
- Interviews with company management
- Contact email to develop partnerships for the marketing of promotional species.

Findings following evaluation of evidence: Since the previous audit, the certificate holder has initiated efforts to market new species. First, the available resource was assessed on the basis of inventories for several species and for all the CFADs managed by Rougier Gabon. According to interviews with management, they estimate that at the company level, they would have the capacity to increase the harvest by 50,000m3 without this requiring any change or major investment in the logistics of transportation to factories. The level of possibility of realization was analyzed. In order to prepare the plots for the start of the harvest of certain species, the trackers started tracking for certain species, notably Ébiara and Mekhogo.

Since 2015, Rougier has obtained confirmation from the Water and Forest Administration for harvesting promotional species. Finally, Rougier Gabon provided email exchanges demonstrating efforts to develop partnerships that will make it possible to market certified promotional species. In particular, for the roll out, the certificate holder sets hopes on 5 species (Ozigo, Ilomba, Aiélé, Ekoune and Ghéombo). The company's actions are used to close this non-compliance.

Status of NCR: CLOSED

Comments (optional):

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<td>Section of report:</td>
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Description of non-conformity an associated evidence:

Summary of Requirement:
The standard requires that the forest manager contributes to promoting the development of markets for little or unknown forest species as well as their sustainable management.

Finding:
During the inventory of exploitation, a list of species to be identified is given to prospectors and it is these species which are the subject of sorting and are proposed for felling.
There is no vision, budget and documented process to ensure that actions are taken to promote the promotion of the development of markets for little or unknown forest species and their sustainable management.

**Evidence considered:**
- Staff interview;
- CFAD Haut-Abanga production reports;

**Corrective action required :**
The organization shall implement corrective actions to demonstrate compliance with the requirement (s) listed above. Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

**Deadline for conformity :** Until the next annual audit

**Evidence provided by Organisation :**
- Request for authorization to exploit promotional species and approval by the administration (dating from 2015).
- Resources in promotional essences by plate.
- Interviews with company management
- Contact email to develop partnerships for the marketing of promotional species.

**Findings following evaluation of evidence :**
Since the previous audit, the certificate holder has initiated efforts to market new species. First, the available resource was assessed on the basis of inventories for several species, and this for all the CFADs managed by Rougier Gabon. According to interviews with management, they estimate that, on a company-wide basis, they would have the capacity to increase the harvest by 50,000m3 without this requiring any change or major investment in the logistics of transportation to factories. The rate of realization of the possibility was analyzed. In order to prepare the plots for the start of the harvest of certain species, the trackers began tracking for certain species, notably the Aiele, Ekoune, Gheombi, Ilomba, Ozigo. RGFlo demonstrated that it was indeed tracked in recent plots including V184 AA and V184AB which were visited during the audit.

Since 2015, Rougier has obtained confirmation from the Water and Forest Administration to harvest promotional species. Finally, Rougier Gabon provided email exchanges demonstrating efforts to develop partnerships that will make it possible to market certified promotional essences. In particular, for the roll out, the certificate holder sets hopes on 5 species (Ozigo, Ilomba, Aïlé, Ekoune and Ghéombi). The company’s actions close this non-compliance.

**Status of NCR :** CLOSED

<table>
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<th>Classification of NC :</th>
<th>Major</th>
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**Section of report:** Annexe IV

**Description of non-conformity and associated evidence:**

**Requirements of the standard demanded by the NCR:**

The conservation and protection areas must have been selected so as to maximize their contribution to the conservation of biodiversity in relation to their size (for example: through the creation of conservation corridors, protected wetlands and via consolidation of natural areas). The size and location of conservation areas must be sufficient, overall, to guarantee the continued presence of rare, threatened or endangered species listed extension, to protect existing examples of ecosystems in their natural state, and these areas must represent at least 10% of the FMU area evaluated.

**Finding:**

The company has identified conservation areas. These are identified as conservation series and protection series and included in the management plan (approximately 6% of the territory). To improve the representativeness of the network, the company has identified an additional 1% of the territory as being under a logging moratorium. The company has not demonstrated that the sub-moratorium area reaches 10% of the CFAD.

**Proof:**

- Forest management plan
- Interviews with Rougier staff

**Corrective Action required:**

The organization shall implement corrective actions to demonstrate compliance with the requirement(s) listed above.

Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

**Deadline for conformity:** Until the next audit.

**Evidence provided by organisation:**

- Maps of Ogooué Ivindo and High Conservation Value
- Interview with RSE manager for Rougier Gabon
- Excel worksheet: Analysis of conservation areas

**Findings following the evaluation of evidence:**

In order to respond to this non-compliance, the Rougier team carried out an analysis of the existing conservation sawdust (4.2% of the territory). The network of conservation areas has been improved by identifying large areas with significant constraints for forest management, such as steep slopes, streams and a buffer zone, a buffer zone around Ivindo Park. By adding these different zones which vary from 90 to 2869 ha the conservation zone goes to 10.2%. Finally, approximately 10% (approximately 5,200 ha) of IFL was added to the conservation area. Thus, almost 17% of the CFAD is administratively protected, that is to say that the company undertakes not to build a road and to harvest no crops in these areas.

The conservation of the areas has been planned for the long term. For example, for watercourses, the company has only selected buffer zones around watercourses of more than 10 that they will not cross.

**Status of NCR:** CLOSED

**Comments (Optional):**
# RNC : 8.5.2/18
Classification of NC : Major

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<td>Section of report</td>
<td>Annexe IV</td>
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**Description of non-conformity and associated evidence :**

**NCR Standard Requirements:**
The procedure for obtaining a copy of a summary of indicator monitoring results should be clearly defined to the public, and the summary should be made available to any interested party who requests it.

**Finding:**
At the time of the audit, the website where the monitoring reports had been made available to the public was not online due to structural changes within the company. According to the responsible staff at Rougier, the documents were always available upon request, however there were no obvious channels for the public to make a request.

**Proof :**
- Interviews with Rougier staff
- Summary report of monitoring

**Corrective action required :**
The organization shall implement corrective actions to demonstrate compliance with the requirement(s) listed above. Note: Effective corrective actions focus not only on the particular situation described above, but also on the root cause to avoid recurrence.

**Deadline for conformity :** Until next annual audit.

**Evidence provided by organisation :** ROUGIER Gabon has added a new sub-section in “Afrique International / Commitments” on the website [www.rougier.fr](http://www.rougier.fr) where a summary of the results of indicator monitoring is included.

**Findings following evaluation of evidence :** Any interested party may therefore have access to the summary of the results of the monitoring of the indicators, as required by the indicator, the NC may therefore be closed.

**Status if NCR :** CLOSED

**Comments (optional) :**