

ASI-ACCREDITATION SERVICES INTERNATIONAL GmbH

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Public summary

FSC Annual Surveillance of Soil Association Woodmark Programme for 2007

Forest Management Audit to Coillte Teoranta Irish Forestry Board,
Ireland
(SA-FM/CoC-0706)

Date of audit: 09-14 September 2007

(Final)

	NAME	DATE
Report drafted by:	Guntars Laguns Simon Armstrong	September 2007
Reviewed by ASI:	Hubert de Bonafos	26 September 2007
Reviewed by CB:	SA	November 2007
Finalized by ASI:	Guntars Laguns	December 2007

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1 Background

The operation audited by CB

Name of operation	Coillte Teoranta Irish Forestry Board
Total area	445,315 ha
Type of management	Plantations
Name of contact person	Alistair Pfeifer
Address	Co. Wicklow, Newtown Mount Kennedy
Country	Ireland
Phone number	+35312011111
E-mail address	alistair.pfeifer@coillte.ie

Brief description of the company

See webpage www.coillte.ie or SA public report on SA website.

The certification history

Certificate issued by SGS	May 2001
Certificate transfer to SA	February 2003
Surveillance audits by SA	April /May, October 2003. May/ June 2004
Reassessment:	November / December 2005
Date of certificate re-issue	24 May 2006
Date of 1st surveillance	December 2006
Date of 2nd surveillance	September 2007 (this audit)

ASI Audit Details

Purpose of audit	Annual SA FM surveillance audit
ASI lead auditor	Guntars Laguns
Local Expert / ASI auditor	Simon Armstrong
Audit language	English

Audit agenda

9 September (Sunday)	
AM	Meeting with stakeholders
10 September (Monday)	
AM	Opening meeting, ASI and SA
	Opening meeting, SA and Coillte, presentation from company
	Follow up on previously raised CARs.
PM	
11 September (Tuesday)	
AM / PM	Site visits

12 September (Wednesday)	
AM	Field visits
PM	Office, document review, evaluation of certain SA checklist indicators
13 September (Thursday)	
AM/ PM	Follow up on CARs, discussion of audit findings
14 September (Friday)	
AM	SA and company closing meeting
	ASI and SA closing meeting
PM	Travel to Dublin
	Work on audit report
15 September (Saturday)	
AM	Travel to Liepaja, Latvia / Edinburgh, Scotland

People involved and met during the audit

CB	Huw Denman (Lead auditor) Roger Busby Marie-Christine Flechard Jerry Hawe Adriene Booth Gus Hellier
Operation	Company staff members
Others	NA

Main documents and records reviewed

CB documents	
Company's documents	Different management planning, operational and monitoring documents
Other documents	National regulations and different stakeholders' provided documents

2 Audit objectives and planning

The objectives of this forest management surveillance audit are:

1. Evaluation of certification body's performance in implementing the accredited certification system in accordance with FSC accreditation requirements.
2. Witness an audit team to determine whether or not the team:
 - a) adequately applies the procedures and instructions of the certification body;
 - b) members exhibit the characteristics of an auditor as detailed in ISO 19011;
 - c) has the required expertise of the sector in which the audit is being undertaken;
 - d) applies appropriate expertise in the correct sense;
 - e) undertakes the audit effectively and draws correct conclusions.
3. Evaluation of the conformity of the certificate holder with FSC and certification body's certification requirements in so far as this is necessary to verify the performance of the certification body.
4. Evaluation of stakeholder comments or complaints ASI received in relation to this operation.

ASI annual surveillance audits are conducted as "*witness audits*". The number of audits per year is determined by ASI surveillance policy; sampling is based on the ASI sampling procedure.

Due to the nature of ASI surveillance procedures, audit evidence is only based on a sample of the information available and therefore there is always an element of uncertainty in the audit findings.

3 ASI stakeholder consultation process

The ASI stakeholder consultation process consists of 2 parts:

1. public announcement of the audit on the FSC electronic fora and on the ASI website prior to the audit to solicit stakeholder comments;
2. direct interviews with selected key-stakeholders mainly conducted by the contracted local expert prior, during and after the audit.
3. ASI meeting with stakeholders in Limerick, Ireland, before the audit.

Summary of main concerns expressed by stakeholders

Stakeholder Comments	ASI response
Not appropriate scale (area) of clear fellings	Problems with large clearfells have been identified. Corrective action requests (CARs) are proposed by ASI (see Annexes) and SA (see public summary on SA website).
Not appropriate water protection, erosion caused by forest operations	Problem has been addressed by SA through appropriate CARs
Closing or downgrading of CARs by SA without appropriate evidence	Problems have been identified. Major CARs are proposed (see Annexes).
No traceability of noncompliance by company since SA closes CARs and identifies new ones with different numbers.	Problems have been identified. CAR and REC are proposed (see Annexes).
Not appropriate species selection	Problems have been identified. Corrective action requests (CARs) are proposed by ASI (see Annexes) and SA (see public summary on SA website).
No appropriate landscape planning	Problems have been identified. Corrective action requests (CARs) are proposed by ASI (see Annexes) and SA (see public summary on SA website).
No appropriate broadleaves proportion	Problems have been identified. Corrective action requests (CARs) are proposed by ASI (see Annexes) and SA (see public summary on SA website).
No appropriate excision of lands	Problems have been identified. Corrective action requests (CARs) are proposed by ASI (see Annexes) and SA (see public summary on SA website).
No appropriate consultations with stakeholders	Problems have been identified. Corrective action requests (CARs) are proposed by ASI (see Annexes) and SA (see public summary on SA website).
Legal status of Coillte – public or private organization	In the SA report it is stated that Coillte is a Government owned Private Limited Company.
HCVF are not identified	Major problems regarding compliance of Coillte with FSC Principle 9 have been identified in

	this audit. A Major CAR is proposed (see Annexes).
Use of chemicals from FSC highly hazardous list	<p>ASI audit team did not detect any nonconformity as SA and the certificate holder have presented an official request for derogation regarding the use of alpha cypermethrin in line with FSC new pesticide policy. This derogation is currently being reviewed by FSC in line with FSC requirements.</p> <p>However, simazin is used in nurseries. Nurseries have not been included in the scope of this evaluation and no derogation has been requested. A CAR is proposed (see Annexes).</p>

Summary of nonconformities and observations

Major CAR(s)	Minor CAR(s)	Observations
2	10	7

Conclusion and recommendation

Based on the findings of this audit, the ASI audit team recommends to FSC AC the continuation of the FSC forest management accreditation for SA in Ireland, subject to the timely closing of the nonconformities identified during the audit and specified in the nonconformity reports (attached).

Attachments

Nonconformity reports (NCRs)

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	REC.SA.FM.IE.2007.01	Date	14 September 2007
Nonconformity detected by (name of auditor)	Guntars Laguns		
Through (e.g. office audit, document review)	FM surveillance Audit 2007		
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> OBSERVATION	
<p>SA Woodmark Generic standard and checklist, issue 3, Adapted standard for Ireland, amended with stakeholder comments on 23 April 2003, available on SA website, was reviewed.</p> <p>This checklist was not the same as the one used by SA for this audit, since SA has adapted their new generic standard for certification in Ireland after 2004 but did not publish it on the SA website.</p> <p>The certified company was apparently not aware that SA FSC standard had changed as the company was still using the version from 2003. SA should ensure that certificate holder is informed about changes in certification requirements in advance of an audit.</p>			
Normative Reference(s)	NA		
Comments:			

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	REC.SA.FM.IE.2007.02	Date	14 September 2007
Nonconformity detected by (name of auditor)		Guntars Laguns	
Through (e.g. office audit, document review)		FM surveillance Audit 2007	
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> OBSERVATION	
<p>SA standard indicator indicates that a summary of the company's monitoring activities will be included in the SA public summary report instead of the certified company making publicly available its own report. It is not the role of an FSC accredited CB to undertake work so that a certified company can demonstrate compliance with the relevant standard requirements.</p> <p>ASI recommends that SA review its generic standard.</p>			
Normative Reference(s)	NA		
Comments:			

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	REC.SA.FM.IE.2007.03	Date	14 September 2007
Nonconformity detected by (name of auditor)		Guntars Laguns	
Through (e.g. office audit, document review)		FM surveillance Audit 2007	
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> OBSERVATION	
<p>ISO 19011, part 6.5.5 requires, that “audit evidence should be evaluated against the audit criteria to generate the audit findings. Audit findings can indicate either conformity or nonconformity with audit criteria.”</p> <p>ASI audit team considers that in several occasions SA did not properly word a corrective action request and did not base it against relevant audit criteria. For example, described non-compliance in CAR 2007.4 is that “up to date EIA training records have not been provided” and identifies FSC Criterion 1.1, 3.3 1and 7.3 as relevant audit criteria. Woodmark indicator under 7.3 requires training records to be kept up-to-date. However, the corrective action request states that “Coillte shall ensure that EIA are carried out”. Thus, ASI audit team considers SA corrective actions are not always clearly related to the identified non-compliance.</p>			
Normative Reference(s)	NA		
Comments:			

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	REC.SA.FM.IE.2007.04	Date	14 September 2007
Nonconformity detected by (name of auditor)	Guntars Laguns		
Through (e.g. office audit, document review)	FM surveillance Audit 2007		
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> OBSERVATION	
<p>SA CAR 2007.8 requires that Coillte demonstrate how a 10% broadleaves area will be achieved but does not specify at which level (overall area, FMU area, site level, number of plants, etc) this needs to be achieved. As a non-compliance SA identifies that planting rates of broadleaves are below 10 %. During the audit it was apparent that SA and Coillte are discussing these broadleaves cover targets at company level and district (FMU) level. However, WM standard indicator 10.4.4 sets species proportion requirements for site level.</p> <p>ASI identified some inconsistency in interpreting and applying standard requirements and considers that SA should define what is considered site level in its evaluations and justify it definition.</p>			
Normative Reference(s)	NA		
Comments:			

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	REC.SA.FM.IE.2007.05	Date	14 September 2007
Nonconformity detected by (name of auditor)	Guntars Laguns		
Through (e.g. office audit, document review)	FM surveillance Audit 2007		
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> OBSERVATION	
<p>Although there are no FSC requirement for CBs to perform stakeholder consultation before a surveillance audit, SA performed appropriate stakeholder consultation before this surveillance audit.</p> <p>SA was able to demonstrate that during the stakeholder consultation process, prior to the audit, interviews were appropriately performed. However during the audit several interviews with contractors and employees were performed in the presence of Coillte management representatives.</p> <p>ASI recommends SA auditors to ensure that worker interviews are performed without the presence of managers.</p>			
Normative Reference(s)	FSC-STD-20-006, part 3.2		
Comments:			

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	REC.SA.FM.IE.2007.06	Date	14 September 2007
Nonconformity detected by (name of auditor)	Guntars Laguns		
Through (e.g. office audit, document review)	FM surveillance Audit 2007		
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> OBSERVATION	
<p>For the stakeholder complaint in district W2, issue No 2040, registered 26/06/07, the file has no information on how the complaint was dealt with by the company. The date in the stakeholder consultation register states that the complaint was resolved on 20/07/07, but, no information is included on how the complaint was addressed and what was the outcome. Such approach for dispute and complaint management shows that the system is not adequately implemented to ensure compliance with the FSC Principles and Criteria certification requirements.</p> <p>ASI audit team considers that available evidence does not clearly demonstrate that the certified operation has implemented appropriate complaint and dispute management procedures as requested by CAR 2006.9. It is ASI recommendation for SA to ensure that company has properly implemented its procedure for disputes resolution.</p>			
Normative Reference(s)	FSC P&C, Criterion 4.5		
Comments:			

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	REC.SA.FM.IE.2007.07	Date	14 September 2007
Nonconformity detected by (name of auditor)	Guntars Laguns		
Through (e.g. office audit, document review)	FM surveillance Audit 2007		
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> OBSERVATION	
<p>During the audit there was evidence of widespread practice of premature clear felling. Coillte is also replanting forests on raised bogs, which is not considered as an economically viable practice.</p> <p>ASI audit team considers that such silvicultural practice is not consistent with Principle 5 relating to efficient use of the forest and economical viability of activities.</p> <p>It is recommendation for SA to evaluate this practice against Principle 5 requirements.</p>			
Normative Reference(s)	NA		
Comments:			

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	CAR.SA.FM.IE.2007.01	Date	14 September 2007		
Nonconformity detected by (name of auditor)		Guntars Laguns			
Through (e.g. office audit, document review)		FM surveillance Audit 2007			
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION		
Woodmark Generic standard and checklist, issue 3, Adapted standard for Ireland, amended with stakeholder comments on 23 April 2003 is published on the SA website.					
SA has adapted for Ireland its new generic standard after 2004, but has not published it on the SA website.					
Normative Reference(s)		FSC-STD-20-003, part 4.7			
Corrective Action Request: CB shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.					
Timeline for implementation			Next office audit		
Corrective Action implemented by Certification Body					
Here: describe action taken in detail					
Corrective Action evaluated by ASI					
Here: describe conclusion in detail					
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:		
Comments:					

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Nonconformity detected by (name of auditor)		Guntars Laguns		
Through (e.g. office audit, document review)		FM surveillance Audit 2007		
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION	
In the SA inspector manual GM-FM-001-04, part 2.3.3, it is clearly stated that all nonconformities remaining outstanding from previous audits shall be evaluated. However, there was no evidence during this audit that, for example, 2006.28, 2007.6 and 2007.7 were properly evaluated.				
Normative Reference(s)	GM-FM-001-04, part 2.3.3; FSC-STD-20-008, part 3.2, Box2			
Corrective Action Request: CB shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.				
Timeline for implementation		Next office audit		
Corrective Action implemented by Certification Body Here: describe action taken in detail				
Corrective Action evaluated by ASI Here: describe conclusion in detail				
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:	
Comments:				

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Nonconformity detected by (name of auditor)		Guntars Laguns		
Through (e.g. office audit, document review)		FM surveillance Audit 2007		
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION		
The SA public summary report was published more than 60 days after the surveillance audit.				
Normative Reference(s)	FSC-STD-20-009, part 2.2			
Corrective Action Request: CB shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.				
Timeline for implementation		Next office audit		
Corrective Action implemented by Certification Body				
Here: describe action taken in detail				
Corrective Action evaluated by ASI				
Here: describe conclusion in detail				
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:	
Comments:				

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Nonconformity detected by (name of auditor)	Guntars Laguns		
Through (e.g. office audit, document review)	FM surveillance Audit 2007		
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION	
<p>SA audit team kept CARs open instead of upgrading them when evidence of compliance was not available (For example, 2006.4 and 2006.8). Both CARs are related to stakeholder consultation. CAR 2006.4 was recorded as a REC on reassessment, and then was raised as a condition again in 1st surveillance audit. Although SA auditors could not find evidence of compliance, they did not upgrade the CAR to a major CAR. CAR 2006.8 was raised as a minor CAR in the 2005 audit, and afterwards upgraded to a MAJOR CAR during the 1st surveillance audit, and then downgraded to a minor CAR in July 2007. During this 2nd surveillance audit SA auditors did not find evidence of compliance, but still prolonged this CAR until July 2008. Thus, non-compliance with relevant FSC Criterion is likely to be ongoing for a few years. It should be noted that the same issue was raised in the previous certification period.</p> <p>The same issue is related to CAR 2006.30, which was identified during the SA reassessment, then upgraded to Major, then downgraded to a Minor CAR. This prolonged process has resulted with company non-compliance with the relevant standard requirements over a period of time.</p> <p>The following requirement is from the FSC standard FSC-STD-20-002:</p> <p><i>„The non-compliance may be down-graded to a minor non-compliance if the nature of the non-compliance now has the characteristics specified in paragraph 8.3.1.</i></p> <p><i>If the nature of the non-compliance still has the characteristics specified in paragraph 8.3.2 or 8.3.3 then the certificate shall be suspended or withdrawn.</i></p> <p><i>Repeated failure to take adequate action to correct a minor non-compliance would therefore result in the suspension or withdrawal of the certificate.“</i></p> <p>It is the responsibility of a certification body to ensure that the auditors grade CARs according to the FSC requirements (FSC-STD-20-002, part 8.3.1): <i>„A non-compliance may be considered minor if:</i></p> <ul style="list-style-type: none"> • <i>it is a temporary lapse, or</i> • <i>it is unusual/ non-systematic, or</i> 			

- *the impacts of the non-compliance are limited in their temporal and spatial scale, and*
- *prompt corrective action has been taken to ensure that it will not be repeated, and*
- *it does not result in a fundamental failure to achieve the objective of the relevant FSC Criterion.“*

ASI audit team considers that these nonconformities (e.g. 2006.4, 2006.8., and 2006.30) can not be considered as unusual and unsystematic and that the impacts of these nonconformities are not limited in their temporal and spatial scale.

SA documented procedures are even stricter, not allowing downgrading of Major Condition (Final in SA system), see part 1.2.6 from GM-FM-001. The SA inspector manual clearly states that if: „*Conditions are not met in full then a series of steps is taken culminating in suspension and subsequent withdrawal of the certificate. If a Condition is not met it is upgraded to become a ‘Final Condition’. If a Final Condition is not met, then the certificate is suspended. If corrective action is not then taken within the time specified by Woodmark the certificate is withdrawn.*”

The SA auditors apparently have not followed SA procedures in this certification project.

ASI audit team considers that SA accredited procedures have not been appropriately implemented and did not ensure that the certificate holder complies with all relevant FSC standard requirements.

Normative Reference(s)	FSC-STD-20-008, part 8, SA GM-FM-001, part 1.2.6.
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Corrective Action Request:

CB shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.

Timeline for implementation	Next office audit
-----------------------------	--------------------------

Corrective Action implemented by Certification Body

Here: describe action taken in detail

Corrective Action evaluated by ASI

Here: describe conclusion in detail

<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:	
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Comments:

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

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Nonconformity detected by (name of auditor)		Guntars Laguns	
Through (e.g. office audit, document review)		FM surveillance Audit 2007	
Nonconformity	Status	<input checked="" type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION	
<p>ASI audit team considers that in some cases the SA decision was made based on an evaluation of the certificate holder procedures instead of field performance compliance in line with the corrective actions and/ or standard requirements.</p> <p>For example, during this audit, CARs 2006.13 and 2006.30 were closed by the SA audit team. However, the ASI auditors considers that during this audit SA audit team actually did not evaluate implementation of these two CARs. The ASI audit team considers that there was no justification to close these CARs, since there was</p> <p>a) no proper evaluation of compliance and</p> <p>b) no evidence of compliance.</p> <p>CARs were already raised in the 2005 reassessment, upgraded to Major and then downgraded to Minor, and closed during this audit with no evidence of appropriate actions being implemented by the certified operation.</p> <p>Such an approach is not in line with FSC requirements for forest management evaluations. FSC-STD-20-007, part 1.3 b) states that the certification body shall confirm that there is a management system in place that is capable of ensuring that all the requirements of the specified Forest Stewardship Standard are implemented within every FMU within the scope of the evaluation. This is in line with FSC-STD-20-002 part 2.1, which states that compliance with the standard shall be determined by evaluating observed performance at the Forest Management Unit (FMU) level against each indicator of the standard, and in comparison with any performance threshold(s) specified for the indicator.</p> <p>During this certification project there are numbers of cases, e.g. 2006.6, when CARs and RECs have been closed based on document evidence rather than field performance. This is not acceptable where implementation and field performance is also required under the terms of the SA CARs.</p> <p>The ASI audit team considers that SA must ensure that auditors base their conclusions on objective evidence obtained during FMUs field performance evaluation instead of procedures or other system documents.</p>			
Normative Reference(s)		FSC-STD-20-007 part 1.3, FSC-STD-20-002 part 2.1	

Corrective Action Request: CB shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.			
Timeline for implementation		3 months	
Corrective Action implemented by Certification Body			
Here: describe action taken in detail			
Corrective Action evaluated by ASI			
Here: describe conclusion in detail			
<input type="checkbox"/> CLOSED	Name auditor:		Date:
<input type="checkbox"/> UPGRADED			
<input type="checkbox"/> OTHER DECISION*			
Comments:			

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Nonconformity detected by (name of auditor)		Guntars Laguns			
Through (e.g. office audit, document review)		FM surveillance Audit 2007			
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION			
<p>ASI considers that SA has not ensured during its evaluations that the certified company implements proper HCVF identification and management. For details please see part 5.9 of this report.</p> <p>During the audit there was evidence of excision of potential HCVF. The land, which potentially could be considered as HCVF, was sold without evaluation for high conservation values and attributes or appropriate stakeholder consultation.</p> <p>Also, it should be noted that during the audit ASI identified that Coillte is developing other business opportunities, excising its land for windfarms. In these cases there is no evidence that the company performed appropriate identification of high conservation values before excision from the certified area.</p> <p>ASI considers that the certified operation has not adequately demonstrated compliance with the FSC Excision policy and that compliance has not been adequately evaluated by SA.</p>					
Normative Reference(s)	FSC-POL-20-003				
Corrective Action Request: CB shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.					
Timeline for implementation			Next office audit		
Corrective Action implemented by Certification Body					
Here: describe action taken in detail					
Corrective Action evaluated by ASI					
Here: describe conclusion in detail					
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:		
Comments:					

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	CAR.SA.FM.IE.2007.07	Date	14 September 2007	
Nonconformity detected by (name of auditor)		Guntars Laguns		
Through (e.g. office audit, document review)		FM surveillance Audit 2007		
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION		
<p>The Certified operation's land tenure dispute procedure is not considered appropriate by the ASI audit team, because the procedure allows Coillte to continue its activities under certain circumstances even when disputes are not resolved.</p> <p>SA raised a CAR (2006.6) requiring the implementation of a land tenure dispute procedure, clearly indicating that the dispute procedure must ensure that all operations are suspended until a dispute is resolved. However, SA then allowed the company to have procedure with the following wording: <i>"operations will be suspended as soon as written details of the dispute are received and will not be resumed until the full procedure has been followed"</i>. This procedure allows Coillte to resume operations in cases where a dispute is not solved. It is not clear why SA stepped back from its initial corrective action request and allowed company to have and implement a procedure not in full compliance with the initial CAR.</p> <p>ASI audit team considers that SA evaluation and follow up did not ensure that the certified operation is in compliance with the certification requirement.</p>				
Normative Reference(s)	FSC Criterion 2.3			
Corrective Action Request: CB shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.				
Timeline for implementation		Next office audit		
Corrective Action implemented by Certification Body Here: describe action taken in detail				
Corrective Action evaluated by ASI Here: describe conclusion in detail				
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:	
Comments:				

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	CAR.SA.FM.IE.2007.08	Date	14 September 2007
Nonconformity detected by (name of auditor)		Guntars Laguns	
Through (e.g. office audit, document review)		FM surveillance Audit 2007	
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION	
<p>The issue of the management of stakeholder complains and disputes has been an issue for years in this certification project.</p> <p>Stakeholder consultation is in many cases a mutual process and requires a lot of resources from a certified operation. However, it is an FSC requirement that certified companies are operating transparently, ensuring stakeholder consultation and participation in forest management planning activities as well as in the implementation of the FMP.</p> <p>SA has issued CAR 2006.8 to ensure that company meet these FSC requirements. This CAR was kept open by SA audit team after this ASI audit, although it was already identified in SA reassessment (Nov 2005), upgraded to a Major CAR (Dec 2006), and downgraded to a Minor CAR (July 2007).</p> <p>ASI considers that such approach of follow up on identified non-compliance does not ensure that adequate stakeholder consultation process is implemented by the certified company. This CAR is also related to the identification of HCVF and excision of lands from the certified area.</p>			
Normative Reference(s)	FSC P&C, Criterion 4.4		
Corrective Action Request: CB shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.			
Timeline for implementation		Next office audit	
Corrective Action implemented by Certification Body			
Here: describe action taken in detail			
Corrective Action evaluated by ASI			
Here: describe conclusion in detail			
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:	Date:	
Comments:			

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	CAR.SA.FM.IE.2007.09	Date	14 September 2007
Nonconformity detected by (name of auditor)		Guntars Laguns	
Through (e.g. office audit, document review)		FM surveillance Audit 2007	
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION	
<p>Certified operation in many cases implemented large scale clear felling.</p> <p>The ASI audit team considers that during the 2nd surveillance (this audit) there was evidence that the certified operation did not comply with standard requirements and SA CARs, since large scale clear felling without landscape design plan were evident and clear fells in OWS were still possible.</p> <p>Some issues relating to large scale clear felling were addressed by SA CARs 2006.13 and 2006.14. During the closing meeting of the audit SA decided to close CAR 2006.13 and leave open 2006.14 until further information is provided by Coillte.</p> <p>After the audit SA raised this issue as a Major nonconformity and recommended the suspension of the certificate. However, after receiving the SA draft audit report, Coillte provided evidence to SA to demonstrate that the company complies with the standard requirements. ASI audit team considers that such evidence was not present during the audit and considers that the company could not demonstrate compliance at the time of the audit.</p> <p>ASI audit team considers that SA has not ensured compliance with relevant standard requirements.</p>			
Normative Reference(s)	FSC P&C, Criterion 6.3		
<p>Corrective Action Request:</p> <p>CB shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.</p>			
Timeline for implementation		Next office audit	
Corrective Action implemented by Certification Body			
Here: describe action taken in detail			
Corrective Action evaluated by ASI			
Here: describe conclusion in detail			
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:	Date:	
Comments:			

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	CAR.SA.FM.IE.2007.10	Date	14 September 2007
Nonconformity detected by (name of auditor)	Guntars Laguns		
Through (e.g. office audit, document review)	FM surveillance Audit 2007		
Nonconformity	Status	<input checked="" type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION	
<p>After this ASI audit, SA proposed two CARs related to HCVF management. However, ASI does not consider that these CARs fully address non-compliance since systematic approach on HCVF definition and identification is not fully implemented by the certified company. A number of assessments have been performed by the company mainly related to the environmental aspects of high conservation values, however, other aspects such as social and cultural aspects have not been adequately considered.</p> <p>According to the company's HCVF definition, old woodland sites shall be considered as HCVF. However, since the definition does not clearly refers to all old woodland sites as HCVF, the company's definition is open to interpretation which is being used by the company, e.g. allowing the excision of lands or performing clear cuts without prior assessment and consultation process.</p> <p>From ASI perspective, such approach and flexibility does not ensure that high conservation values are maintained. A certified operation shall have clear criterions and definition for HCVF identification covering all aspects of FSC HCVF definition.</p> <p>ASI did not find evidence during this audit that the certified operation had conducted a systematic assessment to determine the presence of all attributes consistent with High Conservation Value Forests on their territory (FSC Criterion 9.1) nor that the certified operation adequately consulted with stakeholders on the identification of these High Conservation Values, and the management options thereof (FSC Criterion 9.2). Due to the non-compliance with FSC Criteria 9.1 and 9.2 it is subsequently difficult to evaluate compliance with FSC Criteria 9.3 and 9.4.</p> <p>This nonconformity constitutes a fundamental failure at Principle level.</p>			
Normative Reference(s)	FSC P 9		
<p>Corrective Action Request:</p> <p>CB shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.</p>			
Timeline for implementation	3 months		
Corrective Action implemented by Certification Body			
Here: describe action taken in detail			

Corrective Action evaluated by ASI				
Here: describe conclusion in detail				
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:	
Comments:				

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	CAR.SA.FM.IE.2007.11	Date	14 September 2007		
Nonconformity detected by (name of auditor)		Guntars Laguns			
Through (e.g. office audit, document review)		FM surveillance Audit 2007			
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION			
<p>SA has identified non-compliance related to the implementation of landscape design plans and raised CAR 2006.30. This CAR has been identified already during SA reassessment, then upgraded to Major, and downgraded to Minor, thus not ensuring company compliance with relevant standard requirements for at least 3 years.</p> <p>The CAR was closed by SA during this audit closing meeting. At the same time SA has also maintained another CAR 2006.14, which is also related to landscape in management planning and which was identified as a Major CAR after this audit and SA auditors recommended the suspension of certified operation.</p> <p>However, ASI audit team considers that the non-compliance identified by SA has not been addressed fully by the certified operation and thus CAR 2006.30 should not have been closed.</p>					
Normative Reference(s)	FSC P&C, Criterion 10.2				
<p>Corrective Action Request:</p> <p>CB shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.</p>					
Timeline for implementation			Next office audit		
Corrective Action implemented by Certification Body					
Here: describe action taken in detail					
Corrective Action evaluated by ASI					
Here: describe conclusion in detail					
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:		
Comments:					

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	CAR.SA.FM.IE.2007.12	Date	14 September 2007		
Nonconformity detected by (name of auditor)		Guntars Laguns			
Through (e.g. office audit, document review)		FM surveillance Audit 2007			
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION		
<p>FSC Principle 10, Criterion 10.7 requires that CB evaluates nurseries as part of plantations. However, SA auditor and certified operation staff announced that nurseries are outside of the scope of the certificate. It is clear that seedlings and plants Coillte use for forest establishment and regeneration is coming from nurseries managed by Coillte. Thus it is not clear why SA has decided that nursery is not included in the scope (FSC-ADV-30-102 nurseries and scope of FME).</p> <p>ASI considers that there was no evidence available during this audit that nurseries managed by certified operations have been evaluated against relevant standard requirements by SA audit team, to ensure certified operation compliance with FSC Principles and Criteria.</p>					
Normative Reference(s)		FSC P&C, Criterion 10.7			
<p>Corrective Action Request:</p> <p>CB shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.</p>					
Timeline for implementation			Next office audit		
Corrective Action implemented by Certification Body					
Here: describe action taken in detail					
Corrective Action evaluated by ASI					
Here: describe conclusion in detail					
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:		
Comments:					

Terms and definitions

Nonconformity: The absence of, or the failure to implement and maintain, one or more management system requirements of the reference standards, or a situation which would, on the basis of available objective evidence raise significant doubt as to the credibility of the certificates issued by the applicant body. ASI procedures for nonconformity and corrective action requests are included in ASI QMS, procedure ASI-PRO-20-116 Corrective action procedure.

Note:

A “nonconformance” is a product that does not meet specifications;

A “nonconformity” is a process that does not meet specifications.

According to their severity, nonconformity is graded into three categories:

Major Nonconformity - CAR

“A systematic failure or significant deficiency -either as a single incident or a combination of a number of similar incidents- in a significant part of the quality system, or the lack of implementation of such a part, governed by applicable standards. A number of minor nonconformities against one requirement of the reference standards can represent a total breakdown of the system and thus be considered a major nonconformity.”

Minor Nonconformity – CAR

“An isolated or sporadic lapse in the content or implementation of procedures or records which could reasonable lead to failure of the system if not corrected. If a pattern of minor nonconformities occurs over successive assessments, it may represent a total breakdown of the system and a major non-conformance shall be issued.”

Observation or recommendation - REC ¹

“An area of concern, a process, document, or activity that is currently conforming that may if not improved, result in a nonconforming system, product or service. Observations shall be recorded in the audit report for the benefit of the customer.”

¹ **Note:** Observations are related to an area of concern, a process, document, or activity that is currently conforming that may if not improved, result in a nonconforming system, product or service. Thus, observations which are not considered by the CB may be upgraded to conditions in the following audit.