

# ASI-ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

## FSC Annual Surveillance of SGS for 2006

Forest Management Audit to Barama Co Ltd (BCL), Guyana  
(SGS-FM/COC-2493)

Date of audit: 20 to 25 November 2006

*(Public Summary)*

|                      | NAME              | DATE             |
|----------------------|-------------------|------------------|
| Report drafted by:   | Hubert de Bonafos | 26 November 2006 |
| Reviewed by ASI:     | Daniel Arancibia  | 26 November 2006 |
| Reviewed by SGS:     | Gerrit Marais     | 28 December 2006 |
| Finalized by ASI:    | Hubert de Bonafos | 04 January 2007  |
| Report last updated: | Hubert de Bonafos | 15 January 2007  |

**Table of Content**

|   |           |
|---|-----------|
| <b>1 - Background</b>   | <b>3</b>  |
| <b>2 - Audit objectives and planning</b>                        | <b>6</b>  |
| <b>3 - ASI stakeholder consultation process</b>                 | <b>6</b>  |
| <b>4 - Audit findings: Certification Body Audit Performance</b> | <b>9</b>  |
| <b>5 - Nonconformities and observations</b>                     | <b>11</b> |
| <b>6 - Conclusion and recommendations</b>                       | <b>11</b> |
| <b>Annex 1 – Nonconformity reports</b>                          | <b>11</b> |

## Credits

The author would like to thank Gerrit Marais and Felicity Henman-Weir from SGS as well as Mohindra Chand for preparing and making the arrangements that made this audit possible and efficient.

## 1 Background

### The operation audited by SGS

|                               |  |
|-------------------------------|--|
| <b>Name of operation</b>      | Barama Co. Ltd (BCL)   |
| <b>Total area</b>             | Compartment 4: 378,596 ha<br>Compartment 5: 210,843 ha       |
| <b>Type of management</b>     | Tropical natural forest                                      |
| <b>Name of contact person</b> | Mohindra Chand<br>Roberto Ocampo                             |
| <b>Address</b>                | Land of Canaan, East bank Demerara, PO Box 10480, Georgetown |
| <b>Country</b>                | Guyana   |
| <b>Phone number</b>           | 00 592 225 4555  |
| <b>Fax number</b>             | 00 592 225 4558  |
| <b>URL</b>                    |  |
| <b>E-mail address</b>         | <a href="mailto:baramagis@yahoo.com">baramagis@yahoo.com</a> |

### The certification history

|                                  |   |
|----------------------------------|---|
| <b>Pre-audit</b>                 |   |
| <b>Main audit</b>                | 28 February to 04 March 2005                    |
| <b>Preconditions audit</b>       | 29 August to 02 September 2005                  |
| <b>Date of certificate issue</b> | 17 February 2006                                |
| <b>Date of 1st surveillance</b>  | 20 to 25 November 2006 (ASI surveillance audit) |

### ASI Audit Details

|                                 |                                |
|---------------------------------|--------------------------------|
| <b>Purpose of audit</b>         | 2006 annual surveillance audit |
| <b>ASI lead auditor</b>         | Hubert de Bonafos              |
| <b>Local Expert/ translator</b> | Daniel Arancibia               |
| <b>Audit language</b>           | English                        |
| <b>Sites audited</b>            | BCL compartments 4 and 5       |

### Audit agenda

| <b>20/11/2006</b> |  |
|-------------------|--|
| 08:00 – 09:00     | Meeting between SGS team and the Forestry Commissioner (James Singh) at the Guyana Forestry Commission (GFC) |
| 11:00 – 13:00     | SGS stakeholder meeting  |
| 16:00 – 18:00     | Buckhall camp  |
| 18:00 – 19:00     | SGS opening meeting with the management of the   |

FSC Forest Management Surveillance Audit of SGS for 2006: Barama, Guyana

|                              |   |
|------------------------------|---|
|                              | company   |
| <b>21/11/2006</b>            |   |
| 07:00                        | Leaving main camp (Buckhall)  |
| 9:00 – 10:00                 | Sub-camp Km 70  |
| 10:00 – 10:30                | Log yard Km 71  |
| 11:00 – 12:30                | Concession compartment 5; stumping 2, Quarry M1 – Q6, Bridge.   |
| 13:00 – 14:45                | Blocks 18 S and 18R   |
| 15:00 – 16:00                | Block 16 S  |
| 16:30                        | Km 100, road built in 2005  |
| 18:30                        | Back to main camp   |
| <b>22/11/2006</b>            |   |
| 7:00 – 7:30                  | Meeting with SGS audit team to clarify role of ASI audit team   |
| 7:30 – 9:45                  | Road M3, blocks 8AU, 8 AV and 9AV   |
| 10:45 – 12:00                | Interview with chainsaw operator and demonstration of tree felling.   |
| 12:00                        | Decommissioned camp   |
| 12:45 – 13:00                | Bridge and road construction work (August 2006)   |
| 13:00 – 14:00                | Block 15 AS   |
| 14:00 – 15:00                | Block 8 AS  |
| 17:30 – 20:00                | Review documents, management plans, inventories and maps  |
| <b>23/11/2006</b>            |   |
| 08:00 – 9:30                 | Chain of custody at Buckhall sawmill, document review   |
| 9:30 – 10:15                 | Audit of the operations from log yard to finished products  |
| 10:15 – 11:30                | Review of documents   |
| 13:30 – 15:30                | Review of Export documents, Barging-out reports, Log pond monthly reports for 2006, Km 70 stumpage report 2006, logs dispatch to Buckhall sawmill |
| All day for ASI local expert | Visit to local and indigenous communities with SGS social expert; Akawini, Saint Monica, Karawuab, CDO of Ministry for Amerindian Affairs.        |
| <b>24/11/2006</b>            |   |
| 08:00 – 12:00                | SGS team meeting in preparation for closing meeting<br>ASI internal meeting   |
| 14:00 – 16:00                | SGS and company closing meeting with presentation of the nonconformities  |
| 16:30 – 18:30                | Trip from Buckhall to Georgetown  |
| 19:00 – 20:00                | ASI and SGS closing meeting with presentation of the nonconformities  |
| <b>25/11/2006</b>            |   |
| 10:00 – 13:00                | ASI post audit meeting with stakeholders in Georgetown, Guyana.   |
| 14:30 – 18:00                | ASI post audit meeting with stakeholders in Georgetown, Guyana.   |

People involved in the audit

|                  |   |
|------------------|---|
| <b>SGS</b>       | Felicity Henman-Weir (SGS lead auditor)<br>Salahadin Jaacob (SGS auditor)<br>Michael E. Scott (SGS local expert on social issues)   |
| <b>Operation</b> | Mohindra Chand (Forest planning manager)<br>Roberto M. Ocampo (Chief forester)<br>Cho Shiew Bun (Sawmill manager)<br>Lim Min Kong (Camp manager)<br>Dickmas Deris (Logpond supervisor)<br>Tamelines Mayla (Camp administration officer)<br>Maurice Jones (Camp administration supervisor)   |
| <b>Others</b>    | Stakeholders:<br>Peter Persaud (President TAAMOG)<br>Ronald Cumberbatch (GNIFC)<br>Jocelyn Dow (GCI)<br>Rupert Roopnaraine (WPA)<br>Janette Bulkan (GNIFC)<br>David James (APA)<br>Jean Rose (APA)<br>Joe Eizein (APA Volunteer)<br>Sharon Ousman (GNIFC)<br>Vander Redrik (GCI)<br>Howard Bulkan (GMA Wood sector)<br>James Singh (Forestry Commissioner)<br>Julius (Chainsaw operator)<br>Lloyd Pereira (CDO Region 2 of Ministry for Amerindian Affairs)<br>Leaders of indigenous communities: Thomas Charles, Winston Prathwat, and representatives of the Akawini Council. |

## 2 Audit objectives and planning

The objectives of this forest management surveillance audit are:

1. Evaluation of certification body's performance in implementing their documented accredited certification system in accordance with FSC accreditation requirements.
2. Witness a certification body's audit team to determine whether the audit 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 for the audit which is being undertaken;
  - d) applies appropriate auditing techniques and expertise in evaluating compliance with the certification requirements;
  - e) undertakes the audit thoroughly and 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 conclusions of the certification body.
4. Evaluation of stakeholder comments or complaints received in relation to this operation.

ASI annual surveillance audits are based on a sample of the valid certificates of the audited CB within the scope of accreditation. 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 the ASI surveillance procedure, the 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 stakeholder consultation process employed by ASI consists of the following:

1. Mr. Arancibia, FSC LAC representative, started the ASI consultation process by e-mail and during his visit to Guyana on October 8-13, 2006.
2. Public announcement of the audit on the FSC electronic fora and on the ASI website about one month prior to the audit to solicit stakeholder comments (13 October 2006).
3. Direct interviews with selected stakeholders mainly conducted by the contracted local expert prior, during and after the audit.
4. ASI audit team also organised a meeting with stakeholders in Georgetown, Guyana, during the surveillance audit.

| Stakeholder comments   | ASI response  |
|--|---|
| SGS had unclear criteria to select "primary" stakeholders. Some representative stakeholders (including representatives of indigenous communities) were not properly consulted. | See section below for ASI broader response on stakeholder consultation. ASI proposes <b>CAR.SGS.FM.2006.03</b> to address this issue. |

FSC Forest Management Surveillance Audit of SGS for 2006: Barama, Guyana

|  |   |
|--|---|
| <p>SGS procedures for stakeholder consultation are not adequate and SGS did not follow appropriate stakeholder consultation procedures in line with the Guyanese Constitution.</p> |   |
| <p>SGS public summary report was not sent to all relevant stakeholders.</p>  | <p>FSC requirements state that in the event of a certificate being issued, the certification body shall inform the consulted stakeholders on how their concerns raised were addressed. See section below for ASI response on SGS stakeholder consultation process.<br/>ASI proposes <b>CAR.SGS.FM.2006.03</b> to address this issue.</p>  |
| <p>No public summary of the company's forest management plan available.</p>  | <p>ASI proposes <b>CAR.SGS.FM.2006.14</b> to address this issue.</p>  |
| <p>SGS conflict of interest procedures have not been adequately implemented.</p>   | <p>Prior to SGS main certification evaluation, one SGS auditor supported the preparation of the company through SGS's Certification Support Program and performed pre-evaluation audits at the company. This SGS auditor was not involved in SGS main certification evaluation, but the SGS stakeholder consultation letter was sent on 05 February 2005 from his consultancy company Global Forestry Solutions.<br/>The SGS local expert for the main certification evaluation is currently working as an external consultant for BCL and another company with which BCL has an agreement, less than 2 years after having participated in the SGS certification process. Some certification bodies consider as normal ethical procedure for an auditor not to offer its services to a company within 2 years after having participated in the evaluation of the company.<br/>These issues have been raised in the past by ASI to SGS and SGS should take appropriate measures to ensure that any potential or perceived conflict of interest, which could discredit the certification process, is fully documented, investigated and addressed in line with SGS accredited procedures. ASI proposes <b>REC.SGS.FM.2006.01</b>.</p> |
| <p>Implementation of FSC partial certification policy by SGS was not appropriate. This is</p>  | <p>ASI proposes <b>CAR.SGS.FM.2006.04</b> to address this issue.</p>  |

FSC Forest Management Surveillance Audit of SGS for 2006: Barama, Guyana

|   |   |
|---|---|
| <p>an important issue as BCL has currently direct and indirect control over as much as 33% of production forest through harvesting contracts which may not be in full compliance with legal requirements.</p>   |   |
| <p>Samling group, BCL parent company, is going to sale shares in Hong-Kong stock exchange.</p>  | <p>This issue is beyond the scope of ASI surveillance audit and could not be investigated. No response can be provided.</p>   |
| <p>Contract signed between the Akawini and Saint Monica communities and Interior Wood Products Incorporated (IWPI). IWPI is working for BCL and has just been created to cover BCL's activities. The community is very unhappy and is being cheated by the company.</p> | <p>SGS investigated this issue during this annual surveillance audit and ASI followed SGS in their investigation. SGS and ASI went to visit the Akawini and Saint Monica communities and interviewed some of their representatives. The comments received were confirmed during this visit and SGS committed to take appropriate measures to address the situation. ASI proposes <b>CAR.SGS.FM.2006.06</b> to address this issue.</p> |
| <p>BCL has been fined for lack of payment of the 2% export tax in the export of logs coming from areas outside its own concession.</p>  | <p>SGS investigated the issue during this audit and ASI followed SGS in their investigation. SGS and ASI went to visit the Guyana Forestry Commission (GFC) and to interview the Forestry Commissioner. The Forestry Commissioner confirmed this issue, that is being addressed officially by the GFC and that currently is being resolved.</p>   |
| <p>National legislation does not allow subcontracting, and BCL is currently doing so by having harvesting contracts with other SFPs.</p>  | <p>ASI could not investigate this issue in details. See section below for ASI response on SGS stakeholder consultation process.<br/>ASI proposes <b>CAR.SGS.FM.2006.03</b> to address this issue.</p>   |
| <p>BCL has fuel concessions so that BCL does not have to pay taxes on fuel. However, BCL is using this exemption while working on harvesting subcontracts for other legal entities outside its own concession. This is not legal practice.</p>                          | <p>This issue was beyond the scope of ASI surveillance audit and could not be investigated during this audit. No response can be provided. See section below for ASI response on SGS stakeholder consultation process.<br/>ASI proposes <b>CAR.SGS.FM.2006.03</b> to address this issue.</p>  |
| <p>BCL has not turned a financial profit in 15 years. This is a quote from Girwar Lalaram, General Manager of BCL. Despite this lack of profit BCL has increased its operations over the last few years. This raises questions.</p>                                     | <p>FSC criterion 5.1 states that forest management should strive towards economic viability. However, FSC standard does not require forest companies to make a financial profit. The evaluation of the financial performance of forest enterprises is outside the scope of FSC certification</p>  |

FSC Forest Management Surveillance Audit of SGS for 2006: Barama, Guyana

|   |  |
|---|--|
|   | and was not investigated during ASI surveillance audit.  |
| BCL is not harvesting NTFPs during pre-harvesting operations and is not allowing local communities to harvest such NTFP products. This issue was raised with SGS in the past but no answer was provided.                            | ASI could not investigate this issue in details. See section below for ASI response on SGS stakeholder consultation process and responses to stakeholders. ASI proposes <b>CAR.SGS.FM.2006.03</b> to address this issue. |
| Implementation of Environmental Impact Assessments.   | ASI proposes <b>CAR.SGS.FM.2006.09</b> to address this issue.  |
| More foreign employees than Guyanese/local employees.<br>No appropriate training of Guyanese/local workers as foreigners maintain all supervisory positions.<br>Different labour practices applied to foreign and national workers. | ASI proposes <b>CAR.SGS.FM.2006.07</b> to address these issues.  |
| Illegal hunting should be investigated.   | ASI proposes <b>CAR.SGS.FM.2006.05</b> to address this issue.  |

Please note that some stakeholders provided their comments in confidence. ASI and FSC are respecting these requests.

4 Audit findings

| CAB AUDIT PERFORMANCE                            |   |
|--|---|
| FSC requirements                                 | Findings and conclusions  |
| Peer reviewers (20-001, sections 18. 2 and 18.3) | SGS report was finalised without adequately taking into account the comments of the 1 <sup>st</sup> peer reviewer (pages 63 to 69).<br>Following the ASI surveillance audit, the ASI audit team agrees with most if not all of the comments made by the peer reviewer. SGS should have investigated and taken into account the comments received, as a number of nonconformities could have been investigated and addressed at an early stage before taking a positive certification decision. The following minor CAR is proposed:<br><b>CAR.SGS.FM.2006.01.</b> |
| Decision making (20-002, Part 2)                 | At the time of the ASI audit, there was evidence that the company had not implemented appropriate procedures to comply with FSC certification requirements. Many of the major CARs proposed by ASI following this surveillance audit relate to this lack of compliance. The following major CAR is proposed:<br><b>CAR.SGS.FM.2006.02.</b>  |

## FSC Forest Management Surveillance Audit of SGS for 2006: Barama, Guyana

|  |   |
|--|---|
| Adaptation of CB standard (20-003)     | SGS organised a stakeholder consultation process prior to SGS main certification evaluation. SGS's proposed forest management certification standard was sent to the Guyana National Initiative on Forest Certification (a national working group, not FSC accredited) for consultation. Indicators specific to Guyana were also included in the standard prior to SGS main evaluation. No nonconformity was detected.  |
| Auditor qualification (20-004)         | The SGS audit team was comprised of 1 qualified SGS lead auditor from South Africa, 1 SGS qualified lead auditor from Malaysia and 1 social expert from Guyana. Such audit team for an annual surveillance audit is in line with FSC requirements.  |
| Stakeholder consultation (20-006)      | Prior to the certification evaluation SGS sent an e-mail to GNIFC which at the time was representing the main stakeholders related to the forestry sector in Guyana. SGS also performed stakeholder consultation during the field evaluation. However, some representative stakeholders (e.g. representatives of indigenous communities such as INDF) were not consulted and SGS did not adequately take into account all the comments received and concerns raised by stakeholders. The following minor CAR is proposed: <b>CAR.SGS.FM.2006.03.</b>  |
| Evaluation process (20-007; ISO 19011) | SGS audit team made an effort to systematically investigate the issues raised by the stakeholders during a meeting prior to this surveillance audit. However, time was limited to thoroughly investigate all the issues raised and to address all the stakeholders' comments. Due to the size of the company and the level of risk presented, SGS should schedule enough audit time to investigate thoroughly all stakeholder comments received and in such high risk situations should consider performing surveillance audits every 6 months to closely monitor compliance with FSC certification requirements. ASI proposes <b>REC.SGS.FM.2006.02.</b> |
| Audit report (20-008)                  | SGS report format is in line with FSC requirements.   |

|  |  |
|--|--|
|  | However, SGS audit team findings as presented in the report do not always accurately reflect the level of field performance and compliance of the certified company as witnessed by the ASI audit team during this surveillance audit. ASI proposes <b>REC.SGS.FM.2006.03</b> .  |
| Public summary (20-009)                    | SGS public summary report is in line with FSC requirements.  |
| Application of FSC policies and guidelines | SGS has not adequately addressed FSC partial certification requirements. SGS reported the forest areas owned by the Samling Group abroad and makes disclosure of some forest areas within Guyana over which the company has some management responsibilities (section 2.7, page 10). Areas visited by the ASI audit team outside the certified compartments 4 and 5 were not managed in the spirit of FSC P&C and major nonconformities could be witnessed by the ASI audit team. The following major CAR is proposed: <b>CAR.SGS.FM.2006.04</b> . |

## 5 Nonconformities and observations

| Major CAR(s) | Minor CAR(s) | Observations |
|--------------|--------------|--------------|
| 9            | 7            | 4            |

See nonconformity reports (attached as an annex) for details.

## 6 Conclusion and recommendation

The certified company could not demonstrate compliance with FSC certification requirements at the time of the ASI surveillance audit. This lack of appropriate evaluation against FSC certification requirements has resulted in systematic major nonconformities which had not been addressed.

Based on the findings of this audit, the ASI audit team propose a number of major CARs which will need to be addressed by SGS within the timeframe specified. Failure to demonstrate compliance with all the major nonconformities within the specified timeframe will result in a report to FSC Executive Director recommending disciplinary measures.

## Attachments

Annex 1: Nonconformity reports (NCRs)

**Annex 1: Nonconformity reports (NCRs)**

|  |                           |  |  |
|--|---------------------------|--|--|
| <h2 style="margin: 0;">ACCREDITATION SERVICES INTERNATIONAL GmbH</h2> <p style="margin: 5px 0 0 0;">Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com</p>  |                           |  |  |
| <h3 style="margin: 0;">NONCONFORMITY / CORRECTIVE ACTION REQUEST</h3>  |                           |  |  |
| REF. No.   | <b>CAR.SGS.FM.2006.01</b> | Date                                       | <b>26 November 2006</b>  |
| Nonconformity detected by (name of auditor)  |                           | <b>ASI audit team</b>                      |  |
| Through (e.g. office audit, document review)   |                           | <b>FM audit</b>                            |  |
| Nonconformity  |                           | Status                                     | <input type="checkbox"/> MAJOR<br><input checked="" type="checkbox"/> <b>MINOR</b><br><input type="checkbox"/> OBSERVATION |
| SGS report was finalised without adequately taking into account the comments of the 1 <sup>st</sup> peer reviewer (pages 63 to 69). Following the ASI surveillance audit, the ASI audit team agrees with most if not all of the comments made by the peer reviewer. SGS should have investigated and taken into account the comments received. (FSC-STD-20-001, sections 18.2 and 18.3). |                           |  |  |
| Corrective Action Request:<br><b>SGS 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.</b>   |                           |  |  |
| Deadline for implementation  |                           | <b>Next SGS office surveillance audit.</b> |  |
| Corrective Action implemented by Certification Body  |                           |  |  |
| <b>Describe action taken by the CB in detail</b>   |                           |  |  |
| Corrective Action evaluated by ASI   |                           |  |  |
| <b>Describe ASI evaluation and conclusion in detail</b>  |                           |  |  |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*   | Name auditor:             | Date:                                      |  |
| Comments:  |                           |  |  |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                           |   |  |       |
|--|---------------------------|---|--|-------|
| REF. No.   | <b>CAR.SGS.FM.2006.02</b> | Date  | <b>26 November 2006</b>  |       |
| Nonconformity detected by (name of auditor)  |                           | <b>ASI audit team</b>                             |  |       |
| Through (e.g. office audit, document review)   |                           | <b>FM audit</b>                                   |  |       |
| Nonconformity  |                           | Status  | <input checked="" type="checkbox"/> <b>MAJOR</b><br><input type="checkbox"/> MINOR<br><input type="checkbox"/> OBSERVATION |       |
| At the time of the ASI audit, there was evidence that the company had not implemented appropriate procedures to comply with FSC certification requirements. Many of the major CARs proposed by ASI following this surveillance audit relate to this lack of compliance and as a result a significant number of major nonconformities could be witnessed which had not been adequately addressed by SGS. (FSC-20-002, section 8). |                           |   |  |       |
| Corrective Action Request:<br><b>SGS 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.</b>   |                           |   |  |       |
| Deadline for implementation  |                           | <b>3 months from finalization of this report.</b> |  |       |
| Corrective Action implemented by Certification Body  |                           |   |  |       |
| <b>Describe action taken by the CB in detail</b>   |                           |   |  |       |
| Corrective Action evaluated by ASI   |                           |   |  |       |
| <b>Describe ASI evaluation and conclusion in detail</b>  |                           |   |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*   |                           | Name auditor:                                     |  | Date: |
| Comments:  |                           |   |  |       |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                           |  |  |       |
|--|---------------------------|--|--|-------|
| REF. No.   | <b>CAR.SGS.FM.2006.03</b> | Date                                       | <b>26 November 2006</b>  |       |
| Nonconformity detected by (name of auditor)  |                           | <b>ASI audit team</b>                      |  |       |
| Through (e.g. office audit, document review)   |                           | <b>FM audit</b>                            |  |       |
| Nonconformity  |                           | Status                                     | <input type="checkbox"/> MAJOR<br><input checked="" type="checkbox"/> <b>MINOR</b><br><input type="checkbox"/> OBSERVATION |       |
| Representative stakeholders (Representatives of indigenous communities) were not consulted prior to the certification evaluation and SGS did not adequately take into account and respond to all the comments received and concerns raised by stakeholders. (FSC-20-006, section 7.3).                                     |                           |  |  |       |
| Corrective Action Request:<br><b>SGS 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.</b> |                           |  |  |       |
| Deadline for implementation  |                           | <b>Next SGS office surveillance audit.</b> |  |       |
| Corrective Action implemented by Certification Body  |                           |  |  |       |
| <b>Describe action taken by the CB in detail</b>   |                           |  |  |       |
| Corrective Action evaluated by ASI   |                           |  |  |       |
| <b>Describe ASI evaluation and conclusion in detail</b>  |                           |  |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*   |                           | Name auditor:                              |  | Date: |
| Comments:  |                           |  |  |       |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|   |                           |   |  |       |
|---|---------------------------|---|--|-------|
| REF. No.  | <b>CAR.SGS.FM.2006.04</b> | Date  | <b>26 November 2006</b>  |       |
| Nonconformity detected by (name of auditor)   |                           | <b>ASI audit team</b>                             |  |       |
| Through (e.g. office audit, document review)  |                           | <b>FM audit</b>                                   |  |       |
| Nonconformity   |                           | Status  | <input checked="" type="checkbox"/> <b>MAJOR</b><br><input type="checkbox"/> MINOR<br><input type="checkbox"/> OBSERVATION |       |
| SGS has not adequately addressed FSC partial certification requirements. SGS report indicates the forest areas owned by the Samling Group abroad and makes disclosure of some forest areas within Guyana over which the company has some management responsibilities (section 2.7, page 10). Areas visited by the audit team outside the compartments under evaluation were not managed in the spirit of FSC P&C and major nonconformities could be witnessed by the ASI audit team. (FSC partial certification policy and SGS indicators 1.6.3 and 1.6.4). |                           |   |  |       |
| Corrective Action Request:<br><b>SGS 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.</b>  |                           |   |  |       |
| Deadline for implementation   |                           | <b>3 months from finalization of this report.</b> |  |       |
| Corrective Action implemented by Certification Body   |                           |   |  |       |
| <b>Describe action taken by the CB in detail</b>  |                           |   |  |       |
| Corrective Action evaluated by ASI  |                           |   |  |       |
| <b>Describe ASI evaluation and conclusion in detail</b>   |                           |   |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*  |                           | Name auditor:                                     |  | Date: |
| Comments:   |                           |   |  |       |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                           |  |  |       |
|--|---------------------------|--|--|-------|
| REF. No.   | <b>CAR.SGS.FM.2006.05</b> | Date                                       | <b>26 November 2006</b>  |       |
| Nonconformity detected by (name of auditor)  |                           | <b>ASI audit team</b>                      |  |       |
| Through (e.g. office audit, document review)   |                           | <b>FM audit</b>                            |  |       |
| Nonconformity  |                           | Status                                     | <input type="checkbox"/> MAJOR<br><input checked="" type="checkbox"/> <b>MINOR</b><br><input type="checkbox"/> OBSERVATION |       |
| During the ASI surveillance audit, SGS has not adequately evaluated the company's compliance with the company's own procedures regarding illegal activities and FSC requirements under criterion 1.5.  |                           |  |  |       |
| Corrective Action Request:<br><b>SGS 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.</b> |                           |  |  |       |
| Deadline for implementation  |                           | <b>Next SGS office surveillance audit.</b> |  |       |
| Corrective Action implemented by Certification Body  |                           |  |  |       |
| <b>Describe action taken by the CB in detail</b>   |                           |  |  |       |
| Corrective Action evaluated by ASI   |                           |  |  |       |
| <b>Describe ASI evaluation and conclusion in detail</b>  |                           |  |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*   |                           | Name auditor:                              |  | Date: |
| Comments:  |                           |  |  |       |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|   |                           |  |                         |
|---|---------------------------|--|-------------------------|
| REF. No.  | <b>CAR.SGS.FM.2006.06</b> | Date   | <b>26 November 2006</b> |
| Nonconformity detected by (name of auditor)   |                           | <b>Hubert de Bonafos</b>   |                         |
| Through (e.g. office audit, document review)  |                           | <b>FM audit</b>  |                         |
| Nonconformity   | Status                    | <input checked="" type="checkbox"/> <b>MAJOR</b><br><input type="checkbox"/> MINOR<br><input type="checkbox"/> OBSERVATION |                         |
| <p>At the time of the ASI surveillance audit, in areas under the indirect control of the company, outside of compartments 4 and 5, there was evidence that local indigenous communities could not maintain full control over forest management on their land (Contract with IWPI and Akawini). They had delegated control without free and informed consent according to their representatives. An exclusive contract was signed between the company IWPI and the local communities. Due to this exclusive contract some local people are not allowed to perform forest management operations on their own land and it is BCL that is currently harvesting on these indigenous lands. BCL has a harvesting contract with IWPI and ASI audit team witnessed the fact that BCL machineries and BCL staff is performing harvesting operations in this Amerindian reservation. BCL argues that nothing can be done to clarify the situation because the contractual agreement is between IWPI and the communities. The communities also stated that they had not been paid over the last 6 months for the timber harvested by BCL. BCL argues that they cannot pay the community directly due to the contract with IWPI. While these activities are not performed directly on the company's certified compartments, such activities are covered by FSC partial certification policy. This issue was not formally addressed by SGS audit team during SGS closing meeting but SGS needs to urgently investigate and address this issue. (FSC Criterion 2.2, 3.1 and 3.2).</p> |                           |  |                         |
| Corrective Action Request:<br><b>SGS 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.</b>  |                           |  |                         |
| Deadline for implementation   |                           | <b>3 months from finalization of this report.</b>  |                         |
| Corrective Action implemented by Certification Body   |                           |  |                         |
| <b>Describe action taken by the CB in detail</b>  |                           |  |                         |
| Corrective Action evaluated by ASI  |                           |  |                         |
| <b>Describe ASI evaluation and conclusion in detail</b>   |                           |  |                         |

FSC Forest Management Surveillance Audit of SGS for 2006: Barama, Guyana

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

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                           |  |                         |
|--|---------------------------|--|-------------------------|
| REF. No.   | <b>CAR.SGS.FM.2006.07</b> | Date   | <b>26 November 2006</b> |
| Nonconformity detected by (name of auditor)  |                           | <b>ASI audit team</b>  |                         |
| Through (e.g. office audit, document review)   |                           | <b>FM audit</b>  |                         |
| Nonconformity  | Status                    | <input checked="" type="checkbox"/> <b>MAJOR</b><br><input type="checkbox"/> MINOR<br><input type="checkbox"/> OBSERVATION |                         |
| At the time of the ASI surveillance audit, the company was not in compliance with FSC Principle 4 certification requirements; e.g. basic health and safety requirements for workers in the camps as well as at work, training (also FSC Criterion 7.3), etc. SGS has not adequately evaluated the company's compliance against FSC Principle 4 and FSC Criterion 7.3. This lack of appropriate evaluation has resulted in systematic major nonconformities at principle level.   |                           |  |                         |
| Corrective Action Request:<br><b>SGS 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.</b>   |                           |  |                         |
| Deadline for implementation  |                           | <b>1 month from finalization of this report.</b>   |                         |
| Corrective Action implemented by Certification Body  |                           |  |                         |
| Following SGS annual surveillance audit, SGS issued 3 minor CAR and one major CAR to address major nonconformities against FSC Principle 4 by the certified company. SGS 3 minor CARs address the following issues: <ul style="list-style-type: none"> <li>- Worker's accommodation is lacking in certain aspects in terms of ILO.</li> <li>- Personal protective equipment (PPE) is not adequate in term of ILO requirements.</li> <li>- Workers have inadequate access to medical facilities while working on the FMU</li> </ul> These minor CARs have a 6 months deadline for compliance, until SGS next surveillance audit. SGS also proposed a major CAR addressing the following issue: <ul style="list-style-type: none"> <li>- Inadequate commitment to meeting the health and safety requirements of workers, and complying as a minimum with the ILO Code of Practice on Safety and health in Forestry.</li> </ul> This major CAR has a 6 months deadline for compliance, until SGS next surveillance audit, which is not in line with SGS procedures. <p><b>SGS minor CARs and 6 months deadlines are inappropriate to adequately address the major</b></p> |                           |  |                         |

|   |                  |  |       |  |
|---|------------------|--|-------|--|
| <p><b>nonconformities witnessed by the ASI audit team during the ASI surveillance audit.</b></p> <p><b>Following the SGS surveillance audit, SGS decided to suspend the company.</b></p>  |                  |  |       |  |
| <p>Corrective Action evaluated by ASI</p>   |                  |  |       |  |
| <p><b>ASI proposes to join the SGS audit team for SGS reinstatement audit to ensure that major nonconformities against FSC Principle 4 have been adequately addressed by the company before reinstatement of the FSC certificate.</b></p> |                  |  |       |  |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*  | Name<br>auditor: |  | Date: |  |
| Comments:   |                  |  |       |  |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                           |   |  |       |
|--|---------------------------|---|--|-------|
| REF. No.   | <b>CAR.SGS.FM.2006.08</b> | Date  | <b>26 November 2006</b>  |       |
| Nonconformity detected by (name of auditor)  |                           | <b>ASI audit team</b>                             |  |       |
| Through (e.g. office audit, document review)   |                           | <b>FM audit</b>                                   |  |       |
| Nonconformity  |                           | Status  | <input checked="" type="checkbox"/> <b>MAJOR</b><br><input type="checkbox"/> MINOR<br><input type="checkbox"/> OBSERVATION |       |
| At the time of the ASI surveillance audit, there was no evidence that the rate of harvest of forest products was not going to exceed levels which can be permanently sustained. SGS has not adequately evaluated the company's compliance against FSC criterion 5.6. This lack of appropriate evaluation has resulted in systematic major nonconformities. |                           |   |  |       |
| Corrective Action Request:<br><b>SGS 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.</b>                                 |                           |   |  |       |
| Deadline for implementation  |                           | <b>3 months from finalization of this report.</b> |  |       |
| Corrective Action implemented by Certification Body  |                           |   |  |       |
| <b>Describe action taken by the CB in detail</b>   |                           |   |  |       |
| Corrective Action evaluated by ASI   |                           |   |  |       |
| <b>Describe ASI evaluation and conclusion in detail</b>  |                           |   |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*   |                           | Name auditor:                                     |  | Date: |
| Comments:  |                           |   |  |       |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|   |                           |   |  |       |
|---|---------------------------|---|--|-------|
| REF. No.  | <b>CAR.SGS.FM.2006.09</b> | Date  | <b>26 November 2006</b>  |       |
| Nonconformity detected by (name of auditor)   |                           | <b>ASI audit team</b>                             |  |       |
| Through (e.g. office audit, document review)  |                           | <b>FM audit</b>                                   |  |       |
| Nonconformity   |                           | Status  | <input checked="" type="checkbox"/> <b>MAJOR</b><br><input type="checkbox"/> MINOR<br><input type="checkbox"/> OBSERVATION |       |
| At the time of the ASI surveillance audit the company had not performed appropriate environmental impact assessments prior to performing activities with a very high and significant environmental impact. SGS did not ensure that the company had appropriate EIA procedures in place before making a positive certification decision. This lack of appropriate evaluation against FSC criterion 6.1 has resulted in systematic major nonconformities. |                           |   |  |       |
| Corrective Action Request:<br><b>SGS 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.</b>  |                           |   |  |       |
| Deadline for implementation   |                           | <b>3 months from finalization of this report.</b> |  |       |
| Corrective Action implemented by Certification Body   |                           |   |  |       |
| <b>Describe action taken by the CB in detail</b>  |                           |   |  |       |
| Corrective Action evaluated by ASI  |                           |   |  |       |
| <b>Describe ASI evaluation and conclusion in detail</b>   |                           |   |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*  |                           | Name auditor:                                     |  | Date: |
| Comments:   |                           |   |  |       |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                           |  |  |       |
|--|---------------------------|--|--|-------|
| REF. No.   | <b>CAR.SGS.FM.2006.10</b> | Date                                       | <b>26 November 2006</b>  |       |
| Nonconformity detected by (name of auditor)  |                           | <b>ASI audit team</b>                      |  |       |
| Through (e.g. office audit, document review)   |                           | <b>FM audit</b>                            |  |       |
| Nonconformity  |                           | Status                                     | <input type="checkbox"/> MAJOR<br><input checked="" type="checkbox"/> <b>MINOR</b><br><input type="checkbox"/> OBSERVATION |       |
| SGS did not ensure that the company had established appropriate conservation zones and protection areas and implemented appropriate procedures to protect these areas (FSC Criterion 6.2).   |                           |  |  |       |
| Corrective Action Request:<br><b>SGS 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.</b> |                           |  |  |       |
| Deadline for implementation  |                           | <b>Next SGS office surveillance audit.</b> |  |       |
| Corrective Action implemented by Certification Body  |                           |  |  |       |
| <b>Describe action taken by the CB in detail</b>   |                           |  |  |       |
| Corrective Action evaluated by ASI   |                           |  |  |       |
| <b>Describe ASI evaluation and conclusion in detail</b>  |                           |  |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*   |                           | Name auditor:                              |  | Date: |
| Comments:  |                           |  |  |       |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                    |                                     |   |       |
|--|--------------------|-------------------------------------|---|-------|
| REF. No.   | CAR.SGS.FM.2006.11 | Date                                | 26 November 2006  |       |
| Nonconformity detected by (name of auditor)  |                    | ASI audit team                      |   |       |
| Through (e.g. office audit, document review)   |                    | FM audit                            |   |       |
| Nonconformity  |                    | Status                              | <input checked="" type="checkbox"/> MAJOR<br><input type="checkbox"/> MINOR<br><input type="checkbox"/> OBSERVATION |       |
| SGS did not ensure that the company had implemented appropriate written guidelines to control erosion, road construction and other mechanical disturbances and to protect water resources before issuing an FSC certificate. This lack of appropriate evaluation against FSC criterion 6.5 has resulted in systematic major nonconformities.   |                    |                                     |   |       |
| Corrective Action Request:<br><b>SGS 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.</b>   |                    |                                     |   |       |
| Deadline for implementation  |                    | Next SGS office surveillance audit. |   |       |
| Corrective Action implemented by Certification Body  |                    |                                     |   |       |
| Following SGS annual surveillance audit, SGS issued 2 major CARs to address the following issues: <ul style="list-style-type: none"> <li>- Site specific assessments of the potential environmental impacts are not carried out prior to the commencement of certain site-disturbing operations, and resulting negative impacts are evident.</li> <li>- Lack of program for restoration of degraded sites.</li> </ul> This major CAR has a 6 months deadline for compliance, until SGS next surveillance audit, which is not in line with SGS procedures. <p style="background-color: yellow; margin-top: 5px;"><b>Following the SGS surveillance audit, SGS decided to suspend the company.</b></p> |                    |                                     |   |       |
| Corrective Action evaluated by ASI   |                    |                                     |   |       |
| <b>ASI proposes to join the SGS audit team for SGS reinstatement audit to ensure that major nonconformities against FSC Criterion 6.5 have been adequately addressed by the company before reinstatement of the FSC certificate.</b>   |                    |                                     |   |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED   |                    | Name auditor:                       |   | Date: |

FSC Forest Management Surveillance Audit of SGS for 2006: Barama, Guyana

|  |  |  |  |  |
|--|--|--|--|--|
| <input type="checkbox"/> OTHER DECISION* |  |  |  |  |
| Comments:                                |  |  |  |  |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                           |  |                         |
|--|---------------------------|--|-------------------------|
| REF. No.   | <b>CAR.SGS.FM.2006.12</b> | Date   | <b>26 November 2006</b> |
| Nonconformity detected by (name of auditor)  |                           | <b>ASI audit team</b>  |                         |
| Through (e.g. office audit, document review)   |                           | <b>FM audit</b>  |                         |
| Nonconformity  | Status                    | <input checked="" type="checkbox"/> <b>MAJOR</b><br><input type="checkbox"/> MINOR<br><input type="checkbox"/> OBSERVATION |                         |
| At the time of the ASI audit, SGS had not ensured that containers, liquid and solid non-organic wastes including fuel and oil would be disposed in an environmentally appropriate manner at off-site locations. This lack of appropriate evaluation against FSC criterion 6.7 has resulted in systematic major nonconformities.  |                           |  |                         |
| Corrective Action Request:<br><b>SGS 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.</b>   |                           |  |                         |
| Deadline for implementation  |                           | <b>3 months from finalization of this report.</b>  |                         |
| Corrective Action implemented by Certification Body  |                           |  |                         |
| <b>Following SGS annual surveillance audit, SGS issued 1 major CAR to address the following issues:</b> <ul style="list-style-type: none"> <li>- <b>Poor waste disposal and hydrocarbon (oil and diesel) management resulting in severe environmental pollution.</b></li> </ul> <b>This major CAR has a 6 months deadline for compliance, until SGS next surveillance audit, which is not in line with SGS procedures.</b><br><b>Following the SGS surveillance audit, SGS decided to suspend the company.</b> |                           |  |                         |
| Corrective Action evaluated by ASI   |                           |  |                         |
| <b>ASI proposes to join the SGS audit team for SGS reinstatement audit to ensure that major nonconformities against FSC Criterion 6.7 have been adequately addressed by the company before reinstatement of the FSC certificate.</b>   |                           |  |                         |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*   | Name auditor:             | Date:  |                         |
| Comments:  |                           |  |                         |

|  |
|--|
|  |
|--|

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                           |   |  |       |
|--|---------------------------|---|--|-------|
| REF. No.   | <b>CAR.SGS.FM.2006.13</b> | Date  | <b>26 November 2006</b>  |       |
| Nonconformity detected by (name of auditor)  |                           | <b>ASI audit team</b>                             |  |       |
| Through (e.g. office audit, document review)   |                           | <b>FM audit</b>                                   |  |       |
| Nonconformity  |                           | Status  | <input checked="" type="checkbox"/> <b>MAJOR</b><br><input type="checkbox"/> MINOR<br><input type="checkbox"/> OBSERVATION |       |
| At the time of the ASI audit, the certified company did not have a management plan for the certified compartment 4 (378,596 ha). This lack of appropriate evaluation against FSC Principle 7 has resulted in a systematic major nonconformity at principle level.  |                           |   |  |       |
| Corrective Action Request:<br><b>SGS 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.</b> |                           |   |  |       |
| Deadline for implementation  |                           | <b>3 months from finalization of this report.</b> |  |       |
| Corrective Action implemented by Certification Body  |                           |   |  |       |
| <b>Describe action taken by the CB in detail</b>   |                           |   |  |       |
| Corrective Action evaluated by ASI   |                           |   |  |       |
| <b>Describe ASI evaluation and conclusion in detail</b>  |                           |   |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*   |                           | Name auditor:                                     |  | Date: |
| Comments:  |                           |   |  |       |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                           |   |  |       |
|--|---------------------------|---|--|-------|
| REF. No.   | <b>CAR.SGS.FM.2006.14</b> | Date                                      | <b>26 November 2006</b>  |       |
| Nonconformity detected by (name of auditor)  |                           | <b>ASI audit team</b>                     |  |       |
| Through (e.g. office audit, document review)   |                           | <b>FM audit</b>                           |  |       |
| Nonconformity  |                           | Status                                    | <input type="checkbox"/> MAJOR<br><input checked="" type="checkbox"/> <b>MINOR</b><br><input type="checkbox"/> OBSERVATION |       |
| At the time of the ASI audit, the certified company did not have a public summary of its management plan(s) in line with FSC requirements under FSC Criterion 7.4.   |                           |   |  |       |
| Corrective Action Request:<br><b>SGS 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.</b>   |                           |   |  |       |
| Deadline for implementation  |                           | <b>Next SGS office surveillance audit</b> |  |       |
| Corrective Action implemented by Certification Body  |                           |   |  |       |
| <b>Following SGS annual surveillance audit, SGS issued 1 major CAR to address the following issues:</b><br>- There is no publicly available summary of the management plan or monitoring results..<br><b>This major CAR has a 6 months deadline for compliance, until SGS next surveillance audit, which is not in line with SGS procedures.</b><br><b>Following the SGS surveillance audit, SGS decided to suspend the company.</b> |                           |   |  |       |
| Corrective Action evaluated by ASI   |                           |   |  |       |
| <b>ASI proposes to join the SGS audit team for SGS reinstatement audit to ensure that major nonconformities against FSC Criterion 7.4 have been adequately addressed by the company before reinstatement of the FSC certificate.</b>   |                           |   |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*   |                           | Name auditor:                             |  | Date: |
| Comments:  |                           |   |  |       |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|   |                           |  |  |       |
|---|---------------------------|--|--|-------|
| REF. No.  | <b>CAR.SGS.FM.2006.15</b> | Date                                       | <b>26 November 2006</b>  |       |
| Nonconformity detected by (name of auditor)   |                           | <b>ASI audit team</b>                      |  |       |
| Through (e.g. office audit, document review)  |                           | <b>FM audit</b>                            |  |       |
| Nonconformity   |                           | Status                                     | <input type="checkbox"/> MAJOR<br><input checked="" type="checkbox"/> <b>MINOR</b><br><input type="checkbox"/> OBSERVATION |       |
| At the time of the ASI surveillance audit, the certified company had established a number of Permanent Sample Plots. However, the company had not established a formal monitoring program and was not analysing the data collected. SGS has not adequately evaluated the company's compliance with FSC criteria 8.1, part of 8.2 and 8.5. |                           |  |  |       |
| Corrective Action Request:<br><b>SGS 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.</b>                |                           |  |  |       |
| Deadline for implementation   |                           | <b>Next SGS office surveillance audit.</b> |  |       |
| Corrective Action implemented by Certification Body   |                           |  |  |       |
| <b>Describe action taken by the CB in detail</b>  |                           |  |  |       |
| Corrective Action evaluated by ASI  |                           |  |  |       |
| <b>Describe ASI evaluation and conclusion in detail</b>   |                           |  |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*  |                           | Name auditor:                              |  | Date: |
| Comments:   |                           |  |  |       |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                           |  |  |       |
|--|---------------------------|--|--|-------|
| REF. No.   | <b>CAR.SGS.FM.2006.16</b> | Date                                       | <b>26 November 2006</b>  |       |
| Nonconformity detected by (name of auditor)  |                           | <b>ASI audit team</b>                      |  |       |
| Through (e.g. office audit, document review)   |                           | <b>FM audit</b>                            |  |       |
| Nonconformity  |                           | Status                                     | <input type="checkbox"/> MAJOR<br><input checked="" type="checkbox"/> <b>MINOR</b><br><input type="checkbox"/> OBSERVATION |       |
| At the time of the ASI surveillance audit, the certified company had identified the presence of attributes consistent with HC VF. However, the management plan did not include specific measures to ensure the maintenance or enhancement of the applicable HCV, and annual monitoring was not performed. SGS has not adequately evaluated the company's compliance with FSC criteria 9.3 and 9.4. |                           |  |  |       |
| Corrective Action Request:<br><b>SGS 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.</b>   |                           |  |  |       |
| Deadline for implementation  |                           | <b>Next SGS office surveillance audit.</b> |  |       |
| Corrective Action implemented by Certification Body  |                           |  |  |       |
| <b>Describe action taken by the CB in detail</b>   |                           |  |  |       |
| Corrective Action evaluated by ASI   |                           |  |  |       |
| <b>Describe ASI evaluation and conclusion in detail</b>  |                           |  |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*   |                           | Name auditor:                              |  | Date: |
| Comments:  |                           |  |  |       |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                    |                |  |       |
|--|--------------------|----------------|--|-------|
| REF. No.   | REC.SGS.FM.2006.01 | Date           | 26 November 2006   |       |
| Nonconformity detected by (name of auditor)  |                    | ASI audit team |  |       |
| Through (e.g. office audit, document review)   |                    | FM audit       |  |       |
| Observation  |                    | Status         | <input type="checkbox"/> MAJOR<br><input type="checkbox"/> MINOR<br><input checked="" type="checkbox"/> <b>OBSERVATION</b> |       |
| <p>Prior to SGS main certification evaluation, one of SGS auditor supported the preparation of the company through SGS support program and performed pre-evaluation audits at the company. This SGS auditor was not involved in SGS main certification evaluation, but the SGS stakeholder consultation letter was sent on 05 February 2005 by this same consultancy company GFS. This was perceived by some stakeholders as a conflict of interest.</p> <p>One of SGS technical expert for the main certification evaluation is currently working as an external consultant for BCL and another company with which BCL has an agreement.</p> <p>These issues have been raised in the past by ASI to SGS and have been addressed by SGS. However, ASI recommends SGS to take appropriate preventive measures to ensure that any potential conflict of interest, which could discredit the certification process, is fully investigated and addressed in line with SGS accredited procedures.</p> |                    |                |  |       |
| Corrective Action Request:<br><b>N/A.</b>  |                    |                |  |       |
| Deadline for implementation  |                    | <b>N/A.</b>    |  |       |
| Corrective Action implemented by Certification Body  |                    |                |  |       |
| <b>Describe action taken by the CB in detail</b>   |                    |                |  |       |
| Corrective Action evaluated by ASI   |                    |                |  |       |
| <b>Describe ASI evaluation and conclusion in detail</b>  |                    |                |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*   |                    | Name auditor:  |  | Date: |
| Comments:  |                    |                |  |       |

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|  |                    |                |  |       |
|--|--------------------|----------------|--|-------|
| REF. No.   | REC.SGS.FM.2006.02 | Date           | 26 November 2006   |       |
| Nonconformity detected by (name of auditor)  |                    | ASI audit team |  |       |
| Through (e.g. office audit, document review)   |                    | FM audit       |  |       |
| Observation  |                    | Status         | <input type="checkbox"/> MAJOR<br><input type="checkbox"/> MINOR<br><input checked="" type="checkbox"/> <b>OBSERVATION</b> |       |
| <p>SGS audit team made an effort to systematically investigate the issues raised by the stakeholders during a meeting prior to this surveillance audit. However, time was limited to thoroughly investigate all the issues raised and to address all the stakeholders' comments.</p> <p>Due to the size of the company and the level of risk presented, SGS should schedule enough audit time to investigate thoroughly all stakeholder comments received and should closely monitor compliance with FSC certification requirements.</p> |                    |                |  |       |
| Corrective Action Request:<br><b>N/A.</b>  |                    |                |  |       |
| Deadline for implementation  |                    | <b>N/A.</b>    |  |       |
| Corrective Action implemented by Certification Body  |                    |                |  |       |
| <b>Describe action taken by the CB in detail</b>   |                    |                |  |       |
| Corrective Action evaluated by ASI   |                    |                |  |       |
| <b>Describe ASI evaluation and conclusion in detail</b>  |                    |                |  |       |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*   |                    | Name auditor:  |  | Date: |
| Comments:  |                    |                |  |       |

\* add comments

## ACCREDITATION SERVICES INTERNATIONAL GmbH

Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

|   |                    |  |                  |  |
|---|--------------------|--|------------------|--|
| REF. No.  | REC.SGS.FM.2006.03 | Date   | 26 November 2006 |  |
| Nonconformity detected by (name of auditor)   |                    | ASI audit team   |                  |  |
| Through (e.g. office audit, document review)  |                    | FM audit   |                  |  |
| Observation   | Status             | <input type="checkbox"/> MAJOR<br><input type="checkbox"/> MINOR<br><input checked="" type="checkbox"/> <b>OBSERVATION</b> |                  |  |
| <p>The scope of SGS certificate “ends immediately when the logs are loaded onto the barge” at Buckhall. However, the scope of SGS evaluation and certificate does appear cover transportation between Buckhall and the export harbour. Despite this possible breach in the chain of custody, the company has been selling FSC logs for export. SGS should ensure that there is no breach in the company’s chain of custody and that the chain of custody of the company is adequately evaluated against FSC certification requirements.</p> |                    |  |                  |  |
| Corrective Action Request:<br><b>N/A.</b>   |                    |  |                  |  |
| Deadline for implementation   |                    | <b>N/A.</b>  |                  |  |
| Corrective Action implemented by Certification Body   |                    |  |                  |  |
| <b>Describe action taken by the CB in detail</b>  |                    |  |                  |  |
| Corrective Action evaluated by ASI  |                    |  |                  |  |
| <b>Describe ASI evaluation and conclusion in detail</b>   |                    |  |                  |  |
| <input type="checkbox"/> CLOSED<br><input type="checkbox"/> UPGRADED<br><input type="checkbox"/> OTHER DECISION*  | Name auditor:      |  | Date:            |  |
| Comments:   |                    |  |                  |  |

\* add comments