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

# **ASI Annual Surveillance of ICILA for 2008**

Forest Management Audit to SEFAC concessions, Cameroon (CMR)

Date of audit: 31 July - 08 August 2008

(Final)

	NAME	DATE
	Hubert de Bonafos	
Report drafted by:	Alfredo Unda	09 August 2008
	Marie Mbolo	
Reviewed by ASI:	Paolo Tranquillini	13 August 2008
Reviewed by CAB:	Marina Crippa	12 September 2008
Finalized by ASI:	Hubert de Bonafos	26 September 2008
Report last updated:		

#### Credits

The authors would like to thank Mr. Annunziato and Mr. Coates and their team from SEFAC A.C. as well as Mr. Liviu Amariei and his team from ICILA for preparing and making the arrangements that made this assessment possible and efficient.

### 1 Background

# The operation audited by ICILA

Name of operation	SEFAC AC (Group entity)
Type of certificate	Group FM/COC (Members: SEFAC AC and Filiere Bois)
Total certified area	314.655 ha Tropical natural forest
Type of management	Management of tropical natural forest
Name of contact person	Giorgio Coates, Representing General Direction
Address	BP 942 Douala - 146 Rue des Ecoles, Douala
Country	Cameroon
Phone number	(+237) 342-97-12 / 950-58-59
Fax number	(+237) 342-38-79
URL	N/A
E-mail address	libongo@sefac.biz
Brief description	The "Société d'Exploitations Forestière et Agricole du Cameroun (SEFAC)" was created in 1968 and installed in the South-eastern part of Cameroon near the Sangha river, in Libongo. Since then, SEFAC has invested in forestry development and infrastructures have been installed in Libongo. During the 1990s, two other forest companies were established the "Société d'Exploitation des Bois d'Afrique Centrale (SEBAC)" and "La Filière Bois (FB)". VASTO LEGNO SPA from Italy defines the commercial and marketing strategy of SEFAC's certified products.
	These three companies have been allocated with a total of 5 "UFAs" all localized in the department of Boumba and Ngoko (UFAs 10.008, 10.009, 10.010, 10.012 and 10.064). The total of these forest concessions covers around 405.000 ha.  The scope of the SEFAC AC group certificate covers 314.655 hectares of tropical forest managed under Cameroon forest concession legislation and exclude the SEBAC FMU 10 009.

### The certification history

Pre-audit	01–10 February 2006
Main audit (Also ASI	29 November – 10 December 2006
surveillance audit):	
Follow-up audit:	22 – 31 July 2007
Date of certificate issue:	20 September 2007
Date of 1st surveillance	31 July – 08 August 2008
(Also ASI surveillance	

audit):

## ASI Assessment Details

Purpose of assessment	ASI Surveillance audit of ICILA for FM/COC for 2008	
ASI assessors	Hubert de Bonafos, lead auditor	
	Alfredo Unda	
ASI Local Expert	Marie Mbolo	
Audit language	French	
Sites audited	SEFAC AC offices in Libongo	
	SEFAC forest concessions (10 008, 10 010, 10 012)	
	Filiere Bois forest concessions (10 064)	
	SEFAC sawmill	
	SEBAC sawmill	

## Audit agenda

Thu 31 July 2008	
09:30 – 11:00	Meeting with FSC Cameroon in Yaounde
11:30 – 12:30	Meeting with CED in Yaounde
13:00 – 14:00	Meeting with WWF in Yaounde
15:00 – 14:00	WWF press conference on forest certification
17:30 – 17:30	Meeting with Groupement de la Filiere Bois du Cameroun
17.30 - 10.30	(IFIA)
Fri 01 Aug 2008	
11:00 – 13:00	Air travel from Yaounde to Libongo
16:00 – 16:30	Preparation meeting with ICILA
16:30 – 17:00	Opening meeting with ICILA and SEFAC
17:00 – 19:00	Presentation of SEFAC
19:00 – 20:00	Site selection for Saturday visits
Sat 02 Aug 2008	
06:40 – 09:00	SEFAC office – CARs and Document review
09:15 – 09:45	Management plans and forestry operations
09:45 – 12:00	Human resources and legal structure of SEFAC, SEBAC
09.43 - 12.00	and Filiere Bois
14:00 – 15:00	Document review
15:30 – 16:30	Libongo market (SEFAC-GTZ market)
16:30 – 17:15	Visit to new houses in Libongo
17:15 – 18:15	SEFAC office
18:15 – 19:00	ASI internal meeting
	Γeam 2 (AU & MM)
07:00 – 11:30	Visit of FMU 10 012 with logging operation
11:30 – 13:30	Visit of FMU 10 010 with logging operation
16:30 – 17:15	Visit Libongo market, housing development & GTZ project
Sun 03 Aug 2008	
09:00 – 11:00	ASI internal meeting
11:00 – 13:00	Document review
13:00 – 19:00	Document review
	Team 2 (AU & MM)
07:30 – 08:30	Breakfast
08:30 – 12:00	Document revision
12:00 – 13:00	Meeting with ICILA
14:00 – 17:00	Document review
	Team 1 (HB & AU)
11:55	Entrance of FMU 10 064 (GPS 611911 – 231173)
11:55 – 12:30	Security point (GPS 603699 – 235119)
13:30 – 14:00	Log yard 49 (GPS 614428 – 232270)
14:00 – 15:00	Log yard 50
15:30	Old Camp (GPS 611499 – 235748)
16:00	Return to Libongo
Mon 04 Aug 2008	
All day	Interviews with stakeholders: workers, supervisors,
,	infirmary, local communities, Baka communities.
Tue 05 Aug 2008	
08:00 – 08:25	Limit FMU 10 008 and 10 009 (GPS 602208 – 322300)
08:30 - 08:35	Bridge of main forestry track
	<u> </u>

ASI Forest Management Surveillance Audit of ICILA for 2008: SEFAC

08:35 - 9:00         Old log yard           09:00 - 09:30         Permanent sample plot           09:30 - 11:00         Steep slope set aside area           12:30 - 13:45         Office: Meeting with WWF           15:40 - 17:30         COC audit of SEBAC sawmill at Bela           17:30 - 18:00         Visit of nursery - SEFAC-ANAFOR project           18:00 - 18:30         Water treatment plant           Tue 05 Aug 2008 Team 2 (AU & MM)           Morning         COC surveillance audit of SEFAC sawmill at Libongo           Afternoon         Meetings with stakeholders           Wed 06 Aug 2008 Team 1 (HB & AU)         Wold of Aug 2008 Team 1 (HB & AU)           08:30 - 09:30         Office SEFAC sawmill for review COC database system           09:30 - 10:30         Meeting with forest manager to discuss HCVF           10:30 - 12:00         ASI internal meeting           16:30 - 17:00         ASI - ICILA internal meeting           17:00 - 19:00         ICILA - SEFAC closing meeting           Wed 06 Aug 2008 Team 2 (MM & AU)           08:30 - 20:00         Travel to Yokadouma           15:00         Travel to Yokadouma           Thu 07 Aug 2008 Team 1 (HB)         Travel by car Libongo-Yaounde           Thu 07 Aug 2008 Team 2 (AU & MM)         Visit to Magistrat, Ministère de la Justice a Yokadouma	ASITUTES	t Management Surveillance Addit of ICILA for 2006. SEFAC
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10:00 – 45:00 Visit to Magistrat, Ministère de la Justice a Yokadouma 10:45 – 11:00 Visit to local ONGs aYokadouma 11:30 – 12:00 Visit to the local government authority 12:30 – 21:00 Travel by car Yokadouma-Yaounde  Fri 08 Aug 2008  08:00 – 10:00 ASI internal meeting 10:30 – 12:30 ASI – ICILA closing meeting	09:00 – 10:00	Visit to Délégation Départemental du Travail et Sécurité
10:45 – 11:00 Visit to local ONGs aYokadouma 11:30 – 12:00 Visit to the local government authority 12:30 – 21:00 Travel by car Yokadouma-Yaounde  Fri 08 Aug 2008 08:00 – 10:00 ASI internal meeting 10:30 – 12:30 ASI – ICILA closing meeting		
11:30 – 12:00 Visit to the local government authority 12:30 – 21:00 Travel by car Yokadouma-Yaounde  Fri 08 Aug 2008  08:00 – 10:00 ASI internal meeting 10:30 – 12:30 ASI – ICILA closing meeting	10 :00 – 45 :00	Visit to Magistrat, Ministère de la Justice a Yokadouma
12:30 – 21:00       Travel by car Yokadouma-Yaounde         Fri 08 Aug 2008       ASI internal meeting         08:00 – 10:00       ASI – ICILA closing meeting         10:30 – 12:30       ASI – ICILA closing meeting		Visit to local ONGs aYokadouma
Fri 08 Aug 2008           08:00 – 10:00         ASI internal meeting           10:30 – 12:30         ASI – ICILA closing meeting		
08:00 – 10:00 ASI internal meeting 10:30 – 12:30 ASI – ICILA closing meeting	12:30 – 21:00	Travel by car Yokadouma-Yaounde
10:30 – 12:30 ASI – ICILA closing meeting	Fri 08 Aug 2008	
		ASI internal meeting
14:00 – 20:00   ASI report writing	10:30 – 12:30	ASI – ICILA closing meeting
	14:00 – 20:00	ASI report writing

## People involved in the audit

CAB	Liviu Amariei, ICILA lead auditor Michael Brink, ICILA auditor Eric Kaffo, ICILA local expert Patrice Bigombe Logo, ICILA local expert
Operation	Eduardo Annunziato, SEFAC administrative director Giorgio Coates, SEFAC contact person (Representant de direction) Oumar Abakar, forest manager Mr. Escassut, responsible of sawmills SEFAC and SEBAC SEFAC and Filiere Bois staff members NED Security staff members
Others	Parfait Mimbimi Esono, FSC NI Cameroon Executive Director Elie Hakizumwami, WWF regional forest officer, CAFTN Coordinator Samuel Nguiffo, Centre pour l'Environnement et le

Developpement (CED) general secretary.

Ouoguia Blandince L'Or, Groupement de la Filière Bois du Cameroun, direction assistant.

Paul Gwet and colleagues, GTZ-ProPSFE South East, staff members

Gerard Sindemo (Directeur Technique CIFED, President du réseau des ONG locales du Sud-Est Cameroun-Yokadouma)

Louis Defo, WWF-Jengi, South East

- M. Ntouanga Jean, Departmental Delegate for labor and social security
- M. Choup Saah Bernard Clovis, Magistrat, tribunal Yokadouma
- M. Mekouba Michel, Coordinator Cercle International de Formation et d'Appui pour le Développement (Cifad)
- M. Ndassa Mamoud, Coordinator Groupement International pour la Protection de l'Environnement et l'Autopromotion et le Développement (GRIPEAD)
- M. Mfofou Aliyou, Préfet de la Boumba et Ngoko (Yokadouma)

### 2 Assessment objectives and planning

The objectives of this forest management surveillance assessment were:

- 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;
  - 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 the certification body and/or operation.

ASI annual surveillance assessments are conducted according to the methodology of "witness audits" following the recommendations of the ISO/ IAF Accreditation Auditing Practice Group (APPG) published in 2005. ASI assessments are based on a sample of the valid certificates of the assessed CAB within the scope of accreditation. The number of assessments 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, assessment evidence is only based on a sample of the information available and therefore there is always an element of uncertainty in the assessment findings.

### 3 Terminology

ASI is applying the terminology following ISO Guide 65, ISO/IEC 17000:2004, ISO/IEC 19011:2002, and the FSC Terms and Definitions from the applicable accreditation and certification standards.

In the following, definitions are provided that apply for key terms relating to this report:

**Assessment**: Evaluation by ASI to assess the competence of a CAB, based on particular accreditation requirements and for a defined scope of accreditation.

**Assessor**: Person assigned by ASI to perform, alone or as part of an assessment team, an assessment of a CAB.

**Audit**: Evaluation by a CAB to verify the compliance of a company with FSC standards.

**Auditor**: Person assigned by the CAB with the competence to conduct an audit.

**CAB**: "Conformity Assessment Body", also "Certification Body"; body that performs certification services under the authority of FSC and under the control of ASI.

**CAR**: "Corrective Action Request"; is issued against the assessed CAB to describe and correct detected nonconformity with accreditation requirements. According to the severity of the nonconformity, a short (usually 3 months) or medium (usually 12 months) timeline is defined to correct the problem.

**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 CAB.

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

#### **Major Nonconformity** (Category 1)

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 applicable standards can represent a total breakdown of the system and thus be considered a major nonconformity

### **Minor Nonconformity** (Category 2)

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 nonconformance is issued.

#### **Observation** (Category 3)

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.

**Objective evidence**: evidence that someone can inspect and evaluate for themselves; this includes documented evidence from documents and records, anecdotal evidence from interviews (if independently corroborated), and factual evidence through direct observations in the field.

**Surveillance:** set of activities to monitor the continued compliance of accredited CABs with accreditation requirements.

**Witnessing**: ASI assessors are observing the CAB auditors carrying out certification services in the company / operation of their certificate holder.

### 4 ASI stakeholder consultation process

The stakeholder consultation process employed by ASI consists of 2 parts:

- Public announcement of the audit on the FSC electronic fora and on the ASI
  website about one month prior to the audit (02 July 2008) to solicit stakeholder
  comments:
- 2. Direct interviews with selected key-stakeholders mainly conducted by the contracted local expert prior, during and after the audit.

Before the audit, ASI asked for further stakeholder comments from NGOs via email (10 July 2008) and personal contacts. Also, to facilitate this process, ICILA provided the list of stakeholders that they had contacted during the original ICILA main audit.

Stakeholder comments	ASI response
Centre pour l'Environnement et le	
Development (CED):	
Clarification needed regarding compliance with Cameroon national law for control over 200,000 ha.	Legal status and General Assembly's minutes of SEFAC, SEBAC and Filiere Bois were reviewed by ICILA and ASI audit teams. These documents show that 3 legal entities and 5 individuals have shares in these three companies. ICILA and ASI audit teams also found that there is no single entity with an interest of more than 50% in all 3 legal entities SEFAC, SEBAC and Filiere Bois. Therefore, there is no single entity with an interest over more than 200,000 ha as none of SEFAC, SEBAC and Filiere Bois' concessions cover more than 200,000 ha.  See section under Principle 1.
At the time of the certification not all the necessary documents were ready. For example, the socio-economic studies requested under Criterion 4.4 were not ready and the certification was granted before the studies results were available.	ASI investigated this issue during this surveillance audit. At the time of this ASI and ICILA surveillance audit, the company was not in full compliance with FSC certification requirements. SEFAC presented a large number of studies which are now available but in

ASI Forest Management Surveillance Audit of ICILA for 2008: SEFAC some cases appropriate measures have not been implemented. Following this surveillance audit, ICILA audit team proposed over 20 corrective action requests to addressed nonconformities identified during the audit, some of them related to the issue raised by the stakeholder. It seems that environmental impact During the ASI surveillance audit, ASI reviewed evidence that legal EIA had been assessment studies were not done or ready in relation to requirements for performed and that the management plans Principle 7. Therefore, no results or d'Amenagements) (Plan had been recommendations of EIA studies were approved. available to add them to the management However, the company had not performed appropriate EIA before plan. disturbing This nonconformity operations. identified by the ICILA audit team and a corrective action request was raised. Regarding Criteria 2.2 it is not clear if the During the audit, ASI reviewed a project for compensation scheme used by the development of a new market in the company was appropriate as it refers to a center of Libongo. legal scheme which was drafted for To build this new market, people had to be compensation in the case of public relocated to new houses. This project was managed by GTZ and Libongo authorities. projects. While the company provided some of the timber for the construction of the houses. and support for this project, the relocation was performed by the local authorities. Compensation was identified attributed on a case by case basis and all the people affected were compensated. ASI could review some of the documents relocation related to this and compensations and could talk to some of the people that had been relocated. No non-conformity with FSC certification requirements has been identified. There seem to be social conflicts between ASI and ICILA audit team thoroughly

There seem to be social conflicts between the company and the workers. Abusive treatment against workers was indicated. Also the company has not respected decisions to favour the workers as well as the minimum legal salary. ASI and ICILA audit team thoroughly investigated these issues during the audit. Stakeholder consultation process was organised with workers, their families, workers' representative and with the Judge based in Yokadouma.

The situation could not be fully clarified before the end of the ASI audit, but ASI requested ICILA to follow-up and to provide a clear response to the stakeholder comment.

More information should be available before the finalisation of ASI and ICILA

reports and will be included to clarify the situation regarding dismissal of workers, work contracts and minimum salaries.

For CED the situation of the Baka forest people in the concessions area is the main problem. CED has talked to local Baka people and claims that their rights are not respected.

At the time of the ASI audit, the company had signed a formal convention with the Baka communities (signed 14 June 2008). ASI met with Baka communities and with Gerard Sindemo (Directeur Centre d'Information et de Formation pour l'Environnement et le Development, President du Reseau des ONG locales du Sud Est Cameroun-Yokadouma) who is in charge of communicating with the Baka populations.

These interviews show that communication has improved and that Baka populations consider the convention signed with the company as a positive step forward as it indicates that all use rights will be respected by the company. They see this convention as a sign of formal recognition However, Baka communities also noted that they are still waiting for the action plan that the company should propose for the implementation of the convention. This action plan has been promised for September 2008. ICILA indicated that they will follow-up to ensure that an appropriate action plan is being developed and implemented in collaboration with Baka communities.

An "habitat improvement" project has been well received by the Baka despite the small scale of the projects.

A small scale agriculture project in collaboration with GTZ has been less successful and the Baka communities do not use the places which were reserved for them in Libongo's new market.

ASI also checked that work opportunities were provided to Baka communities. At the time of the ASI audit, the company had work contracts with 11 Baka.

Baka communities around SEFAC's concessions had also free access to medical treatment delivered by SEFAC's infirmaries.

During meetings with ASI, Baka indicated that they were satisfied with the fact that the company had now formally recognised their rights, that they had full access to the forest and natural resources and that they will get support to obtain official ID cards.

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	No non-conformity with FSC certification requirements was identified at the time of the ASI surveillance audit.
There are also problems with the protected areas as requested by Criteria 3.1, 3.2 and 3.7. Also the communication with Baka people is not well developed and it is not guaranteed by the company.	During the ASI surveillance audit, there was evidence that the company had now established a project to improve communication with Baka communities (see comment above). The company was also working on a strategy to further improve communication with these communities.  The protection of sites of importance for Baka communities was discussed during meetings with the Baka communities. Baka people are participating and joining inventory teams during forestry inventories, so that sites and natural resources of importance for Baka communities can be identified and mapped.  ASI checked the GIS system of the company and saw that sites of special interest had been identified by the company. However, the company had just started to implement this new system based on Cyber-Track. Such system and identification of important sites and natural resources should have started before as it is essential to demonstrate compliance with FSC Principle 3.  No non-conformity with FSC certification requirements was identified at the time of the ASI surveillance audit.
There are demands regarding ICILA certification report:  a. The document is not clear, i.e. who manage the commercial relationships? The document does not explain this in detail. What is exactly certified?  b. The report protocol it is not signed properly.	ASI reviewed ICILA's report prior to and during the audit. ASI identified that ICILA's report is missing information regarding chain of custody for the SEFAC sawmill. This non-conformity is addressed in ASI report below. ICILA's report has a section describing the group certificate which is managed by SEFAC SA. ICILA's report is not always very clear but includes the information requested, apart from the missing information on chain of custody.
In summary, there is a problem with the SEFAC certification, as it seems there is not clear differences between certified and non certified companies.  It is important to solve and clear this	During the ASI surveillance audit, the ASI audit team identified a large number of non-conformities against FSC cer5tification requirements. These nonconformities were also identified by ICILA's audit team and

situation to make certification credible.

21 corrective action requests were raised by ICILA against the company (3 major CARs and 18 minor CARs).

Many of the nonconformities identified during ASI and ICILA surveillance audit should have been identified and addressed by ICILA before awarding an FSC certificate.

However, ICILA has now improved and ICILA's audit team addressed the nonconformities identified during the field surveillance audit. The company will have 6 months to demonstrate full compliance and ASI is recommending ICILA to perform a new field surveillance audit to check for compliance before closing the corrective action raised.

REC.ICILA.FM.CMR.2008.01

### <u>Centre International d'Etudes</u> <u>Forestières et Environnementales:</u>

One part of SEFAC forest under management was granted to a mining company (GEOVIC) who gives accounts directly to a different ministry (Ministry of Mines) rather than the Ministry of Forests and Fauna. And although both ministries belong to the Cameroonian government they have different objectives which can be contradictory in terms of forest sustainable management. This shows the limits of the Cameroonian legislation. The activities of the mining company within the UFA can be contradictory with the SEFAC forest management objectives and this may jeopardize SEFAC certificate if the auditors are not alert in the assessment processes.

This issue was investigated by ASI during the surveillance audit and a meeting was organised with MINFOR Yokadouma to discuss the situation.

MINFOR confirmed that mining concessions overlapping each one of SEFAC's FMUs have been established. The mining concessions cover parts of UFA 10 008, 10 009, 10 010, 10 012 and 10 064 and part of the national park.

This topic was discussed with ICILA's audit team during the audit and ASI recommends ICILA to seek formal guidance from FSC even before the mining companies start the exploration work.

REC.ICILA.FM.CMR.2008.02

We know of many efforts made by SEFAC to collaborate with the neighboring populations to help to improve their living conditions. But our concern of the value of social achievements is always to perceive the durability in term of the community appropriation of the actions carried out by SEFAC so that the communities become independent. Is this under consideration? We have not noticed it yet.

The Comite Paysan Foret (CPF) have started to work but are not yet fully functional. Meetings with the management of the company were organised during the ASI audit.

The adequate implementation of an appropriate action plan should lead to long-term benefits to the local communities.

However, so far the company has only been working in collaboration with NGOs on small scale projects.

ICILA's audit team raised two minor corrective action request against the company to address the following issues:

- the lack of rules, statutes and

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	formal agreement. ICILA will have to follow-up to ensure that the action plan proposed correspond to the needs and requests of the local communities.  - the lack of an overall procedure for communicating with local populations.
WWF: The company has signed an agreement with WWF/CAFTN program. The company has improved a lot in its performance. However, there are several aspects requiring improvements especially with the sawmills such as the working conditions of workers. Improvements are also needed regarding low impact harvesting. The company need also to improve its communication.	ASI agrees with WWF comments. While the company has improved, a large number of nonconformities were identified during ASI surveillance audit. The company will need to address these nonconformities to demonstrate full compliance with FSC certification requirements.

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

### 5

	CAB AUDIT PERFORMANCE
FSC requirements	Findings and conclusions
General requirements (20-001 and 20-002)	Certification decision: ICILA awarded a certificate to SEFAC on 20 September 2007. However, at the time of the ASI surveillance audit in August 2008, there was evidence that the company was not in compliance with many FSC certification requirements. During this ASI surveillance audit, ICILA's audit team addressed most of the nonconformities with appropriate corrective action requests. However, some of the nonconformities identified during the ASI surveillance audit should have been identified and addressed during ICILA's main assessment in November 2006 and ICILA's complementary audit in July 2007.
	FSC standard FSC-STD-20-001, section 19.1, requires a certification body not to issue a certificate if there are outstanding major non-compliances with the FSC Principles and Criteria. CAR.ICILA.FM.CMR.2008.01
	Grading of corrective action requests:  Among the nonconformities identified during the ASI surveillance audit, ICILA raised 2 minor corrective action requests for nonconformities with indicators 3.3.2 and 3.3.3. However, at the time of the surveillance audit the company did not demonstrate compliance with indicator 3.3.1. ICILA's audit team should have addressed these nonconformities through one major corrective action request for non-compliance with criterion 3.3.
	During this ASI surveillance audit, ICILA raised a minor CAR for a nonconformity with indicator 1.5.1. However, ICILA's standard for Cameroon contains only one indicator under criterion 1.5. ICILA's audit team should have raised a major corrective action request to address this nonconformity at criterion level, as the company could not demonstrate compliance with the indicator and the criterion.
	ICILA issued a minor corrective action request for lack of compliance with FSC criterion 7.4 due to a lack of compliance of the company's public summary management plan. Lack of compliance with criterion 7.4 should have been identified as a major corrective action request.
	During this ASI surveillance audit, ICILA raised an observation for a nonconformity with indicator 9.4.1. However, ICILA's standard for Cameroon contains only one indicator under criterion 9.4. ICILA's audit team should have raised a major corrective action request to address this nonconformity at criterion level, as the company could not demonstrate compliance with the indicator and the criterion.
	FSC standard FSC-STD-20-002, section 8.3.2, requires a certification body to consider a non-compliance as major if it

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	results in a fundamental failure to achieve the objectives of the relevant FSC criterion.  CAR.ICILA.FM.CMR.2008.02
Standard adaptation (20-003)	ICILA's locally adapted standard for Cameroon (icila2203 version 2 dated 30-07-06) states in the annexes that "annexes are being translated in French for the final version". Version 2 of ICILA's standard for Cameroon was at the time of the ASI audit only a draft standard as indicated in the standard itself (FSC-STD-20-003, sections 4.1 and 4.7).  Version 2 of ICILA's standard does not include:  - multilateral environmental agreements and ILO Conventions that the country has ratified (FSC-STD-20-003, section 2.1.b).  - list of, or reference to official lists of, endangered species in Cameroon (FSC-STD-20-003, section 2.1.c).  - all the national forest laws and administrative requirements which apply in Cameroon are included in the annexes to the standard (FSC-STD-20-003, section 2.1.a).  ICILA's locally adapted standard for Cameroon (icila2203 version 2 dated 30-07-06) has been reviewed by ASI before the ASI surveillance audit and has been discussed with ICILA's audit team. ICILA's standard for Cameroon is not in compliance with FSC accreditation requirements (FSC-STD-20-002, sections 3.1, 3.7, 3.10, 3.11, 3.13).  ICILA's locally adapted standard for Cameroon (icila2203 version 2 dated 30-07-06) shall be revised to ensure full compliance with FSC requirements.  Major CAR.ICILA.FM.CMR.2008.03
Auditor qualification (20-004)	ICILA performed this surveillance audit with 2 qualified lead auditors and 2 local experts. ICILA's auditors were fully qualified and competent to perform ICILA's surveillance audit. ICILA's local experts were from Cameroon and fully proficient in French. However, ICILA's auditors were lacking full proficiency in French which made the audit more complicated for ICILA's audit team. ICILA should improve the proficiency of its lead auditors in French or should build the capacity of its local experts so that they can participate more actively in such surveillance audit. This would improve communication between ICILA's audit team and the company's management, company's workers, NGOs and other stakeholders.  REC.ICILA.FM.CMR.2008.03
Stakeholder consultation (20-006)	ICILA stakeholder consultation process was very thorough prior to and during this surveillance audit.  The stakeholder consultation process performed by ICILA's audit team during this surveillance audit was very detailed and went beyond strict compliance with FSC requirements for stakeholder consultation.
	No non-conformity with FSC accreditation requirements has been

identified
identified.
ICILA's audit took place over 7 days with 4 team members. ICILA's audit team performed a very through and detailed audit in compliance with FSC accreditation requirements. All FMUs covered by the scope of the FSC certificate were audited and ICILA's audit covered most of FSC certification requirements during this surveillance audit.
ICILA issued a certificate to the group SEFAC and ICILA's report refers to the group SEFAC-Cameroun. The FSC certificate database also refers to "Groupe SEFAC". However, the "group SEFAC" is not a legal entity. ICILA's certificate should have been issued to SEFAC AC and ICILA's report should refer to SEFAC AC as the group entity.  REC.ICILA.FM.CMR.2008.04
ICILA's audit report for SEFAC Group dated 20/09/2007 does not include appropriate information regarding compliance of the group with FSC chain of custody requirements (FSC-STD-20-008, section 6).  CAR.ICILA.FM.CMR.2008.04
ICILA's public summary report was not evaluated for compliance with FSC requirements during this ASI surveillance audit.
SEFAC does not have enough resources to manage and monitor compliance of SEFAC group members with FSC certification requirements.  The person in charge of managing and monitoring the compliance of the group members performed an annual monitoring audit of the group member Filiere Bois in February 2007. Following this monitoring audit, no non-conformity has been identified despite the fact that major nonconformities could be identified a few months later by the ASI and ICILA audit team. FSC requirements for group certificates (FSC-POL-20-001, sections 2.4 and 3.1.3) requires the group entity to ensure that group members comply with FSC certification requirements.
The person in charge of managing the group is also in charge of the management of SEFAC, SEBAC and Filiere Bois'. SEFAC has now recruited 3 assistants to support the forest manager in this task. However, SEFAC small team is unlikely to be sufficient to manage, monitor and ensure full compliance with FSC P&C of a group operating over more than 300,000 ha.
ICILA's audit team did not raise this as an issue with the company and did not issue an appropriate corrective action request to ensure that the group has enough resources to act as a group and ensure full compliance with FSC P&C over more than 300,000 ha.  CAR.ICILA.FM.CMR.2008.05

COC evaluation
40-004
40-005

ICILA performed an evaluation of compliance with FSC chain of custody certification requirements and a separate report has been prepared by ICILA in July 2007. However, ICILA's audit report for SEFAC Group dated 20/09/2007 does not include appropriate information regarding compliance of the group with FSC chain of custody requirements (FSC-STD-20-008, section 6).

### See CAR.ICILA.FM.CMR.2008.04

ICILA performed a chain of custody surveillance audit for SEFAC sawmill and a main assessment for SEBAC sawmill. SEFAC requested ICILA to issue independent COC certificates to these 2 sawmills.

ASI performed a surveillance audit of ICILA for chain of custody during ICILA's main assessment at the SEBAC sawmill. An independent ASI COC surveillance report has been prepared for this surveillance audit.

OPERATION'S COMPLIANCE WITH CERTIFICATION REQUIREMENTS						
FSC requirements	Findings and conclusions					
Principle 1	Control over more than 200,000 ha: Following comments received by stakeholders, ICILA and ASI audit teams evaluated the legal structure of the group SEFAC and compliance with Cameroon's legal requirements for article 49 of Ley number 94/01 from 20 January 1994:					
	1 « (1) la superficie totale pouvant être accordée à un même concessionnaire est fonction du potentiel de la concession forestière calculée sur la base d'un rendement soutenu et durable et de la capacité des industries de transformation existantes ou à mettre en place. Elle ne peut en aucun cas excéder deux cent mille (200 000) hectares.					
	(2) Toute prise de participation majoritaire ou création d'une société d'exploitation par un exploitant forestier ayant pour résultat de porter la superficie totale détenue par lui au-delà de deux cent mille (200 000) hectares est interdit ».					
	Legal status and General Assembly's minutes of SEFAC, SEBAC and Filiere Bois were reviewed by ICILA and ASI audit teams. These documents show that 3 legal entities and 5 individuals have shares in these three companies. ICILA and ASI audit teams also found that there is no single entity with an interest of more than 50% in the 3 legal entities SEFAC, SEBAC and Filiere Bois. Therefore, there is no single entity with an interest over more than 200,000 ha.					
	No non-conformity has been identified.					
	Overlapping mining concessions: This issue was investigated by ASI during the surveillance audit and a meeting was organised with MINFOR Yokadouma to discuss the situation. MINFOR confirmed that mining concessions overlapping each one of SEFAC's FMUs have been established. The mining concessions cover parts of UFA 10 008, 10 009, 10 010, 10 012 and 10 064 and part of the national park.					
	MINFOR confirmed that instructions were received from the Prime Minister to facilitate cohabitation between the forestry and mining companies. However, such cohabitation is likely to be very difficult or even impossible, and such situation is very likely to make it impossible for SEFAC to demonstrate compliance with FSC certification requirements. This topic was discussed with ICILA's audit team during the audit and ASI recommends ICILA to seek formal guidance from FSC even before the mining companies start the exploration work so as to clarify how the impact of mining					
	operations has to be evaluated within an FSC certified FMU. ICILA should seek formal clarification from FSC on the overlap of mining concessions which are being awarded by					

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	Cameroon's government. See REC.ICILA.FM.CMR.2008.02
	Illegal activities: Compliance with FSC criterion 1.5 was evaluated by the ICILA audit team. ICILA has raised a corrective action request to address non-compliance with FSC indicator 1.5.1. See CAR.ICILA.FM.CMR.2008.02
	Reforestation: ICILA audit team evaluated compliance of the company against reforestation requirements included in the company's management plan and part of the legal requirements. ICILA audit team identified a nonconformity with reforestation requirements and addressed this through a minor corrective action request. However, ICILA corrective action request addresses only the lack of reforestation on old landings but does not include the lack of reforestation within the 5 meters corridor defining the FMU limits. ASI and ICILA audit team identified this as a non-conformity during the audit.  REC.ICILA.FM.CMR.2008.05
Principle 2	ICILA audit team thoroughly evaluated compliance with FSC certification requirements under FSC Principle 2 and issued 2 minor corrective action requests to address identified non-conformities regarding:  - Effective implementation of Comite Paysan Foret (CPF).  - Communication procedures with local communities.
Principle 3	ICILA audit team thoroughly evaluated compliance with FSC certification requirements under FSC Principle 3 and issued 3 minor corrective action requests to address identified non-conformities regarding:  - Lack of operational action plan to implement convention with Baka communities.  - Identification of resource areas not validated by the Baka community.  - Training of harvesting teams on Baka resource areas.
Principle 4	ICILA audit team thoroughly evaluated compliance with FSC certification requirements under FSC Principle 4.  During this surveillance audit, ICILA's audit team identified a large number of non-conformities with FSC certification requirements regarding health and safety of workers and their families. ICILA audit team issued one major, five minor corrective action requests and one observation to the company, requesting full compliance with FSC certification requirements:  - Major CAR for non-conformity with indicator 4.2.3.  - Minor CARs for non-conformity with indicators 4.2.5, 4.2.6, 4.2.8, 4.3.4 and 4.4.1.  - Observation for indicator 4.2.7.

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	It was not clear during the audit whether the contract template used by the company with all its workers was in compliance with legal requirements. ICILA indicated during the audit that it will follow-up and issue a new corrective action request if there was evidence that the company's contracts were not in compliance with legal requirements. ASI will follow-up with ICILA to ensure that legal requirements are fully enforced.  ASI and ICILA audit team thoroughly investigated the dismissal of workers by the company following a strike hich took place in October 2006. The situation could not be fully clarified before the end of the ASI audit, but ASI requested ICILA to follow-up on this issue.
	More information should be available before the finalisation of ASI and ICILA reports and will be included in ASI report to clarify the situation regarding dismissal of workers, work contracts and minimum salaries.
	The non-conformities identified during this surveillance audit and ICILA's corrective action requests address very important certification requirements. ASI recommends ICILA to evaluate full compliance with these FSC certification requirements through a new field surveillance audit to be performed within the 6 months timeline established by ICILA for the corrective action requests proposed. See REC.ICILA.FM.CMR.2008.01
Principle 5	ICILA audit team evaluated compliance with FSC certification requirements under FSC Principle 5 and raised a corrective action request against the company under indicator 5.6.3, to address the fact that the reconstitution rate of Ayous in FMU 10 010 was well below the 50% required.
Principle 6	<ul> <li>ICILA audit team evaluated compliance with FSC certification requirements under FSC Principle 6.</li> <li>ICILA audit team raised 2 major and 2 minor corrective action requests to address identified non-conformities regarding:         <ul> <li>Operational harvesting plans, maps and implementation.</li> <li>Lack of procedure for the use of chemical pesticides.</li> <li>Use of a FSC prohibited chemical on a small scale in the nursery.</li> <li>Storage and handling of fuel and lubricants.</li> </ul> </li> </ul>
Principle 7	ICILA audit team evaluated compliance with FSC certification requirements under FSC Principle 7 and raised a minor corrective action request for lack of compliance of the company's public summary management plan.
Principle 8	ICILA audit team evaluated compliance with FSC certification requirements under FSC Principle 8 and raised one minor corrective action request and 1 observation.

	The minor corrective action request proposed address the fact that the company is not efficient in supervising and validating results of external social and environmental monitoring.  The observation proposed relates to the quality of the information obtained from the company's monitoring system.
Principle 9	ICILA audit team evaluated compliance with FSC certification requirements under FSC Principle 9 and raised one corrective action request and one observation. The corrective action request address the fact that some of the identified management measures aimed at protecting high conservation attributes are not implemented. The observation proposed by ICILA relates to the fact that the company has not developed and implemented a monitoring program and strategy aimed at the conservation of HCVF (Indicator 9.4.1.). This observation should have been raised as a corrective action request. See CAR.ICILA.FM.CMR.2008.02
Principle 10	NA
Chain of custody	<ul> <li>Two chain of custody evaluations were performed by ICILA's audit team: <ul> <li>Chain of custody evaluation for the surveillance audit of SEFAC sawmill at Libongo against FSC standard FSC-STD-40-004, version 1.</li> <li>Chain of custody evaluation for the certification audit of SEBAC sawmill at Bela against FSC standard FSC-STD-40-004, version 2.</li> </ul> </li> <li>ASI performed a surveillance audit of ICILA for chain of custody during ICILA's main assessment at the SEBAC sawmill. An independent ASI COC surveillance report has been prepared for this surveillance audit.</li> </ul>

### 6 Nonconformities and observations

Major CAR(s)	Minor CAR(s)	Observations
1	4	5

See nonconformity reports (attached) for details.

Note 1: the failure to successfully address MAJOR CARs within the given timeline may result in disciplinary measurers, including the suspension of accreditation.

Note 2: 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 lead to corrective action requests in the future.

#### 7 Conclusion and recommendation

During this ASI surveillance audit, ICILA's audit team performed a thorough and detailed audit. This audit outlined a large number of nonconformities with FSC certification requirements, some of them major nonconformities, which were adequately addressed by ICILA's audit team. However, some of these non-conformities could and should have been identified by ICILA and addressed by the company following ICILA's main assessment in November 2006 and ICILA's complementary audit in July 2007.

During this ICILA surveillance audit, ICILA's audit team raised against the company 3 major and 18 minor corrective action requests. Some of them will have to be addressed by the company within 6 months after ICILA's audit. ASI recommends ICILA to check compliance with these corrective action requests through a new field surveillance audit by the 6 months timeline specified ICILA's audit team; i.e. 08 February 2009.

Based on the findings of this ASI surveillance audit, the ASI audit team proposes one major corrective action request regarding ICILA's standard for Cameroon, and 4 minor corrective action requests which will need to be addressed by ICILA within the timeframe specified.

ASI recommends to FSC AC maintaining ICILA's accreditation for forest management evaluations worlwide, subject to the timely closing of all the nonconformities identified during this ASI surveillance assessment, as specified in the nonconformity reports (attached). Failure to demonstrate compliance with the major nonconformity within the specified timeframe will result in a report to the FSC Executive Director recommending disciplinary measures.

#### **Attachments**

- Nonconformity reports (NCRs).
- ASI feedback to CAB comments on report (if provided)
- Local expert's report (ASI version only)

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

### 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.ICILA.FM.CMR.2008.01 Date 13 August 2008 Nonconformity detected by (name of auditor) **Hubert de Bonafos** Through (e.g. office audit, document review) FM Surveillance Audit 2008 - SEFAC. Cameroon ☐ MAJOR Nonconformity Status X MINOR ☐ OBSERVATION ICILA issued a certificate to the company despite the fact that there was evidence that the company was not in compliance with many FSC certification requirements. During this ASI surveillance audit, ICILA's audit team addressed most of the nonconformities with appropriate corrective action requests. FSC standard FSC-STD-20-001, section 19.1, requires a certification body not to issue a certificate if there are outstanding major non-compliances with the FSC Principles and Criteria. FSC-STD-20-001, section 19.1 Normative Reference(s) Corrective Action Request: ICILA 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. 3 months from finalization of report Deadline for implementation Corrective Action implemented by Certification Body Here: describe action taken in detail Corrective Action evaluated by ASI Here: describe conclusion in detail □ CLOSED Date: Name ☐ UPGRADED auditor:

☐ OTHER DECISION\*

Comments:

<sup>\*</sup> add comments

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ı	NONCON	FORMITY / CORI	RECTIVE	ACTION I	REQUEST	Γ	
REF. No.	CAR.ICIL/	A.FM.CMR.2008.02	Date	Date 13 August 2008			
Nonconformity	detected by	(name of auditor)	Hubert de	Bonafos			
Through (e.g. o	office audit, d	ocument review)	FM Surve	illance Audi n	it 2008 – SE	FAC,	
Nonconformity			Status		<ul><li>□ MAJOR</li><li>X MINOR</li><li>□ OBSER</li></ul>	RVATION	
corrective action team were graction identified were FSC standard	ICILA audit team addressed the nonconformities identified during the surveillance audit through corrective action requests. However, some of the corrective action requests raised by ICILA's audit team were graded as minor corrective action requests despite the fact that the nonconformities identified were at criterion level.  FSC standard FSC-STD-20-002, section 8.3.2, requires a certification body to consider a noncompliance as major if it results in a fundamental failure to achieve the objectives of the relevant FSC seritorian.						
Normative Refe	erence(s)	FSC-STD-20-002, sec	tion 8.3.2				
and described	plement app l above with	propriate measures to nin the given timeline eliminating causes of	e. The measi	ures shall b	e adequate	to correct the	
Deadline for im	plementation	1	Next offic	e audit			
Corrective Action	on implemen	ted by Certification Bo	dy				
Here: describe action taken in detail							
Corrective Action evaluated by ASI							
Here: describe	conclusion	ı in detail					
☐ CLOSED☐ UPGRADE☐ OTHER DE		Name auditor:			Date:		
Comments:							

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NON	ICON	FORWITT / COP	RECTIVE	ACTION	KEQUES	ı
REF. No. CA	R.ICIL	A.FM.CMR.2008.03	Date	13 Augus	t 2008	
Nonconformity detec	ted by	(name of auditor)	Hubert o	de Bonafos		
Through (e.g. office audit, document review)				FM Surveillance Audit 2008 – SEFAC, Cameroon		
Nonconformity			Status		X MAJOR  MINOR  OBSER	
ICILA's standard for 20-002, sections 3.1 4.7).						
Normative Reference(s) FSC-STD-20-002, section FSC-STD-20-003, section FSC-STD						
Corrective Action Re ICILA shall impleme and described above current problems as	ent app ve with	nin the given timeli	ne. The mea	sures shall l	oe adequate	to correct the
Deadline for impleme				s from finali		
Corrective Action imp	olemen	ted by Certification B	ody			
Here: describe action	on take	en in detail				
Corrective Action evaluated by ASI						
Here: describe conclusion in detail						
☐ CLOSED☐ UPGRADED☐ OTHER DECISION	ON*	Name auditor:			Date:	
Comments:						

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REF. No.	CAR.ICII	_A.FM.CMR.2008.04	Date	13 August 2008		
Nonconformity detected by (name of auditor)			Hubert de	e Bonafos		
Through (e.g. office audit, document review)				FM Surveillance Audit 2008 – SEFAC, Cameroon		
Nonconformity			Status	☐ MAJOR X MINOR ☐ OBSERVATION		
ICILA's audit report for SEFAC Group dated 20/09/2007 does not include appropriate information regarding compliance of the group with FSC chain of custody requirements (FSC-STD-20-008, section 6).						
Normative Refe	rence(s)	FSC-STD-20-008, sec	ction 6			
and described	olement ap above wi	ppropriate measures thin the given timeline	e. The meas	e nonconformity detected in this aud sures shall be adequate to correct the mities in order to avoid recurrence.		
Deadline for imp	olementatio	on	Next offic	ce audit		
Corrective Actio	n impleme	nted by Certification Bo	ody			
Here: describe action taken in detail						
Corrective Actio	n evaluate	d by ASI				
Here: describe conclusion in detail						
☐ CLOSED☐ UPGRADED☐ OTHER DE		Name auditor:		Date:		
Comments:						

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REF. No.	CAR.ICILA	.FM.CMR.2008.05	5	Date	13 Augus	t 2008	
Nonconformity of	letected by (r	name of auditor)		Hubert de	Bonafos		
Through (e.g. of	fice audit, do	cument review)		FM Survei Cameroon		lit 2008 – SE	FAC,
Nonconformity				Status			VATION
SEFAC does not have enough resources to manage and monitor compliance of SEFAC group members with FSC certification requirements.  ICILA's audit team did not raise this as an issue with the company and did not issue an appropriate corrective action request to ensure that the group has enough resources to act as a group and ensure full compliance with FSC P&C over more than 300,000 ha.							
Normative Refe	rence(s) F	SC-POL-20-001, s	sectio	ons 2.4 and	3.1.3		
and described	lement apprabove	opriate measures n the given timel iminating causes	line.	The measu	res shall l	oe adequate	to correct the
Deadline for imp	lementation			Next office	e audit		
Corrective Actio	n implemente	ed by Certification	Body	1			
Here: describe	action taker	ı in detail					
Corrective Action evaluated by ASI							
Here: describe conclusion in detail							
☐ CLOSED☐ UPGRADED☐ OTHER DE		Name auditor:				Date:	
Comments:							

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REF. No.	REC.ICIL	.A.FM.CMR.2008.01	Date	13 August 2008		
Nonconformity of	letected by	(name of auditor)	) Hubert de Bonafos			
Through (e.g. office audit, document review)			FM Surveillance Audit 2008 – SEFAC, Cameroon			
Nonconformity			Status		☐ MAJOR ☐ MINOR X OBSERVATION	
ASI is recommending ICILA to perform a new field surveillance audit within 6 months from the date of ICILA's surveillance audit (8 August 2008) to check for compliance with all the major corrective action requests raised against the company before closing them.						
Normative Refe	rence(s)					
Comments:						

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	REC.ICIL	.A.FM.CMR.2008.02	Date	13 August 2008
Nonconformity of	letected by	(name of auditor)	Hubert d	le Bonafos
Through (e.g. of	fice audit,	document review)	FM Surve	eillance Audit 2008 – SEFAC, on
Nonconformity		Status	☐ MAJOR ☐ MINOR <b>X</b> OBSERVATION	
government of C	Cameroon.		to seek for	have been established by the mal guidance from FSC before the ified FMUs.
Normative Refe	rence(s)			

ASI-REP-54-ICILA-2008-SEFAC.CMR

Comments:

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REF. No.	REC.ICIL	.A.FM.CMR.2008.03	Date	13 August 2008
Nonconformity detected by (name of auditor)		Hubert de Bonafos		
Through (e.g. office audit, document review)		FM Surveillance Audit 2008 – SEFAC, Cameroon		
Nonconformity		Status	☐ MAJOR☐ MINOR  X OBSERVATION	
ICILA should improve the proficiency of its lead auditors in French or should build the capacity of its local experts so that they can participate more actively in such surveillance audit.				
Normative Reference(s)				
Comments:				

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### **NONCONFORMITY / CORRECTIVE ACTION REQUEST**

REF. No.	REC.ICILA.FM.CMR.2008.04	Date	13 August 2008
Nonconformity detected by (name of auditor)		Hubert de Bonafos	
Through (e.g. office audit, document review)		FM Surveillance Audit 2008 – SEFAC, Cameroon	
Nonconformity		Status	☐ MAJOR☐ MINOR  X OBSERVATION
ICILA issued a certificate to the group SEFAC and ICILA's report refers to the group SEFAC-Cameroun. The FSC certificate database also refers to "Groupe SEFAC". However, the "group SEFAC" is not a legal entity. ICILA's certificate should have been issued to SEFAC AC and ICILA's			

report should refer to SEFAC AC as the group entity.

Normative Reference(s)	
Comments:	

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### **NONCONFORMITY / CORRECTIVE ACTION REQUEST**

REF. No.	REC.ICILA.FM.CMR.2008.05	Date	13 August 2008
Nonconformity detected by (name of auditor)		Hubert de Bonafos	
Through (e.g. office audit, document review)		FM Surveillance Audit 2008 – SEFAC, Cameroon	
Nonconformity		Status	☐ MAJOR☐ MINOR  X OBSERVATION
ICILA audit team identified a nonconformity with reforestation requirements and addressed this through a minor corrective action request. However, ICILA corrective action request addresses only the lack of reforestation on old landings but does not include the lack of reforestation within the 5			

meters corridor defining the FMU limits.

Normative Reference(s)	
Comments:	