



FOREST MANAGEMENT SURVEILLANCE REPORT

SECTION A: PUBLIC SUMMARY

Project Nr.:	6274-ZA		
Client:	Mondi Business Paper South Africa		
WebPage:	www.mondibp.co.za		
Address:	171 Jabu Ndlovu , Pietermaritzburg , 3200		
Country:	South Africa		
Certificate Nr.	SGS-FM/CoC 0084	Certificate Type:	Forest Management
Date of Issue	05 July 2005	Date of expiry:	27 November 2007
Scope:	Forest management of plantations in the provinces of Mpumalanga, KZN in South Africa and in Swaziland for the production of soft and hardwood timber. Including CoC for timber depots receiving and dispatching certified timber.		
Company Contact Person:	C Burchmore		
Address:	171 Jabu Ndlovu street Pietermaritzburg.		
Tel:	033 897 4071		
Fax	033 394 6313		
Email:	chris.burchmore@mondibp.com		
Evaluation dates:			
Surveillance 1	8 to 16 September 2003		
Surveillance 2	4 to 8 October 2004		
Surveillance 3	24 to 28 October 2005		
Surveillance 4	4 – 8 September 2006		

TABLE OF CONTENTS

- 1. SAMPLING AND EVALUATION APPROACH 3
- 2. CHANGES IN MANAGEMENT, HARVESTING, SILVICULTURE AND MONITORING 3
- 3. STANDARD USED IN THE EVALUATIONS..... 3
- 4. RECORD OF CORRECTIVE ACTION REQUESTS (CARS) 3
- 5. RECORD OF STAKEHOLDER COMMENTS AND INTERVIEWS 17
- 6. RECORD OF COMPLAINTS 18
- 7. RECORD OF OBSERVATIONS 18
- 7. MAINTENANCE OF CERTIFICATION..... 21

1. SAMPLING AND EVALUATION APPROACH

The team visited sites in all three regions Mpumalanga, Swaziland and Kwazulu-Natal. Sites were selected to cover all aspects of the company's management on the different FMUs. All criteria were checked at the different FMUs but not necessarily everything on each FMU. The sites included Nurseries, clinics, harvesting sites, depots, head office, planning and specialized services, weed control, road maintenance, quarries, worker accommodation and open area management areas. The team travelled together for the duration of the audit but divided on site to verify different aspects. Eight man days were spent on the audit.

2. CHANGES IN MANAGEMENT, HARVESTING, SILVICULTURE AND MONITORING

The following table shows significant changes that took place in the management, monitoring, harvesting and regeneration practices of the certificate holder over the certificate period.

Description of Change	Notes
SURVEILLANCE 1	
Refer separate report	
SURVEILLANCE 2	
Refer separate report	
SURVEILLANCE 3	
None	
SURVEILLANCE 4	
Harvesting operations were mechanised.	Full social impact studies done.
The CEO for Mondi SA John Barton retired and has been replaced by Otto Pichler.	

3. STANDARD USED IN THE EVALUATIONS

A checklist was used that consisted of the documents listed below. This checklist was prepared using the FSC-endorsed national or regional standard. A copy of this checklist is available on the SGS Qualifor website, www.sgs.com/forestry.

Standard Used in Evaluation	Effective Date	Version Nr	Changes to Standard
SGS Qualifor: Generic Forest Management Standard (AD33-ZA-02) adapted for South Africa	1 September 2005	02	Substantial changes were made to the standard and these were subject to a stakeholder review process.

4. RECORD OF CORRECTIVE ACTION REQUESTS (CARS)

RECORD OF CARS

CA R #	FSC P&C	CAR DETAIL					
		Date Recorded>		Due Date>		Date Closed>	
Major 01	1.6	2002/09/18		2002/10/18		2002/10/18	
Non-Conformance:							

CA R #	FSC P&C	CAR DETAIL					
		<p>There is a lack of commitment in adhering to the FSC principles and criteria in terms of the leased farms. Upgraded from Minor CAR 61.</p> <p>Objective Evidence:</p> <p>There is evidence of neglect of the leased farms in Richmond, Hazyview and White River areas such as absence of ECDB and soil maps, absence of open area management plans, very high degree of weed infestation, no weed control plan for White River and Mellgem (Richmond). The termination of lease agreements (e.g. Stentor in Satico, Versailles in Hazyview) without informing the certification body.</p> <p>Close-out evidence:</p> <p>An action plan was received from Mondi Forests, which documented the following: The first step was to determine the status quo of all of the leased farms in terms of where they are and the terms of the lease. The second step is to determine the management requirements of these leases and put target dates in place as to when the required management will be completed. The type of management listed was as follows: the completion of soil surveys, open area management plans (OAMP), tactical road planning and fire break assessment. A complete example with set target dates was provided for the Paper Value Chain. This CAR is closed, and replaced with Minor CAR 10 in order to continue monitoring the implementation of the action plan for the leased areas.</p>					
Major 02	8.3.1; 2.1.1	Date Recorded>	2002/09/18	Due Date>	2002/10/18	Date Closed>	2002/10/18
Non-Conformance:							
Timber harvested from uncertified areas is being sold as FSC certified.							
Objective Evidence:							
Timber harvested from "standing timber" purchase areas such as Walsh, False Bay, Misty Ridge and Meyer, is being sold as certified.							
Close-out evidence:							
Appeal: Mondi Forests appealed against this CAR on the grounds that clause 2.1.1 did not cover "standing timber" agreements and that the uncertified timber sold as certified would not make a difference in the rolling average of the %-based CoC claim of Merebank, and the SAICCOR Sappi client, who did not require certified timber. This CAR was upheld on the basis of the inadequacy in the company's CoC procedure that allowed this to happen. The clause number was changed to 8.3.1. The detail of this SGS response to the appeal is documented in Appendix III of the Re-assessment report of 2002. This CAR was closed on the provision of an updated Chain of Custody (CoC) procedure, revision No 2.							
03	3.3.1; 3.3.2	Date Recorded>	2002/09/18	Due Date>	2003/09/16	Date Closed>	2003/09/16
Non-Conformance:							
Inadequate interaction with stakeholders in terms of the identification of sites and the development of management prescriptions for sites of special cultural, historical, ecological, economic or religious significance.							
Objective Evidence:							
1) No evidence of such interaction (Hazyview, White River, Piet Retief, Greytown – Salem graves), 2) personal communication with staff members – S. McPhial, A. Curling, P. Pienaar), 3) No management prescriptions or maintenance schedules for Tower/BMV WPU ASI's.							
Close-out evidence:							
The past 12 months has seen intensive interaction with local and provincial stakeholders concerning the identification of sites, the capturing of such sites into ASI registers, and the development of management prescriptions for these sites. Minutes of stakeholder meetings were inspected and sites were checked in-field to ensure that management prescriptions were being implemented. No evidence to the contrary was detected. This CAR is closed.							

CA R #	FSC P&C	CAR DETAIL					
		Date Recorded>		Due Date>		Date Closed>	
04 CAR Withd rawn	9.1.1	Date Recorded>	2002/09/18	Due Date>	2003/09/16	Date Closed>	2002/10/18
		Non-Conformance:					
		High Conservation Value Forests (HCVFs) have not yet been determined according to prescribed attributes.					
		Objective Evidence:					
		1) No HCVF evaluations, 2) Interview with Rick van Wyk revealed that the indigenous forest monitoring that he had undertaken did not specifically include the assessment of the attributes of HCVFs for such categorisation, 3) Satico Forest monitoring report – no reference to attributes of HCVFs.					
		Close-out evidence:					
Appeal and Withdrawal of CAR: Mondi Forests appealed against this CAR on the basis that all of their HCVF's have been proclaimed as Natural Heritage Sites. This appeal was supported by the Programme Manager and replaced by an Observation (see Observation 16). The justification of this is appended to the 2002 Re-assessment report (See Appendix III).							
05	2.3	Date Recorded>	2002/09/18	Due Date>	2003/09/16	Date Closed>	2003/09/16
		Non-Conformance:					
		A large number of resident families are still living on Mondi properties. This constitutes a tenure problem of substantial magnitude.					
		Objective Evidence:					
		Extensive informal villages and "kraals" on Mondi WPU's at Piet Retief Area, Paulpietersburg Area, Louwsberg, Greytown Area and Babanango.					
		Close-out evidence:					
<p>Appeal: Mondi Forests appealed against this CAR on the grounds that "<i>the issue of informal villages has not been raised before by the FSC, although villages have been in existence for a large number of years.</i>" Mondi also stated that they had initiated efforts to address the villages, but that the problem was complex and that some of the residents had acquired rights in terms of ESTA. This CAR was upheld. The details of the SGS response are documented in Appendix III of the 2002 re-assessment report.</p> <p>Close-out Details: This CAR has been effectively closed out following intensive interaction between Mondi and SGS-SA where a plan of managing progress with the closure of the CAR was developed. The programme director will have regular meetings with Mondi to assess progress with this CAR until the finalisation of the first surveillance. As the first surveillance has revealed excellent progress with the management of the tenure problem, the CAR can now effectively be closed. The progress of the tenure problem, particularly in the Piet Retief area is evidenced by the disposal or substantial progress of tenure reform at the following properties: Hartebeesfontein farm, Driepan, Riversdale, Rustplaats, Maline, Maphepheni, Nkonjaneni. The programme manager will however, continue to monitor progress.</p>							
06	6.5.3	Date Recorded>	2002/09/18	Due Date>	2003/09/16	Date Closed>	2003/09/16
		Non-Conformance:					
		Adequate emergency procedures were not implemented following accidental oil spills.					
		Objective Evidence:					
		Numerous oil spills at Hazyview area office car park, Boscombe car park, Uplands depot, Salem workshop outlet areas.					
		Close-out evidence:					
Could not be closed out. Replaced with Major CAR 13.							

CA R #	FSC P&C	CAR DETAIL					
		Date Recorded>		Due Date>		Date Closed>	
07 Upgr ade to Major 24	6.2.1; 8.2.3	Date Recorded>	2002/09/18	Due Date>	2003/09/16	Date Closed>	Upgrade to Major 24
		Non-Conformance:					
		Species registers are non-existent or incomplete in several areas at Estate level, particularly for plants. Rare, threatened and endangered (RT&E) species are not identified and monitored at Estate level.					
		Objective Evidence:					
		No species lists or identification of RT&E species for Hazyview, Seven Oaks or Boscombe.					
		Close-out evidence:					
There has been good progress in terms of the generation of species registers and the identification of RT&E species (for example on Tygerskloof), but there are still areas where there is scant or no information (for example DeKaap, Jambile and Toki). There has also been progress in the identification of veld types as a GIS layer, and from this to identify the high risk areas (based on anthropogenic threats such as medicinal plant harvesting, grassland grazing areas, as well as the potential occurrence of RT&E species etc). These high risk areas will then receive priority in terms of baseline studies and monitoring. This is sound logic, and maps with evidence of progress were available. In addition, a "Biodiversity Action Plan" was also submitted by Ricky Pott, which details the targets in generating species lists, identifying red data species and determining management activities. Included in this plan is a progress report of species lists that are currently available in the different areas. This plan, however, is very general and not auditable. Based on this progress, it was decided to keep this CAR open for another year, with the condition that Mondi provide a roll-out of the programme to address this CAR. This action plan must be provided prior to the next surveillance visit, and, obviously verified at the assessment.							
08	6.3.3; 10.2.2; 7.1.13	Date Recorded>	2002/09/18	Due Date>	2003/09/16	Date Closed>	2004/10/08
		Non-Conformance:					
		Long-term open area management planning, particularly with regard to alien vegetation control is not sufficient. This CAR was carried over from Minor CAR 68.					
		Objective Evidence:					
		1) No long-term plans available for weed control for Hazyview, White River and Satico. 2) ECDB mapping is still not complete for all areas. 3) Long-term burning plans and burning records for open areas are not available for all areas e.g. Kranskop WPU.					
		Close-out evidence:					
The Open Area management plan for Barberton (DeKaap, Toki and Jambile) was very good. All open areas are scheduled for management 2003-2010. This management includes long-term burning and weed control planning. The aim is to have 80% of the area covered by 2005. There were good long-term weed control plans for Hilton Heritage and Wel Mountain (Meinweiss Farm) WPU's in the Northern Natal Area. Long-term weed control and burning plans were also checked on New Hanover WPU. These plans were adequate and there was evidence of implementation of the plans. Despite this good progress, however, it was found that there were still areas which were lacking in long-term weed control plans, for example Babanango and Amsterdam WPU's. There was also evidence of areas that had not been scheduled for weed control and evidence of scheduled control that had not been implemented (See Table 1.7 of the 2003 Surveillance Report). For this reason, it was decided to keep this CAR open for an additional year to continue monitoring.							
09	6.5.1	Date Recorded>	2002/09/18	Due Date>	2003/09/16	Date Closed>	2003/09/16
		Non-Conformance:					
		Inadequate long-term planning for road maintenance and improvement (including quarries, stream crossings and depots).					
		Objective Evidence:					

CA R #	FSC P&C	CAR DETAIL					
		1) No long-term plans available for Greenhill WPU, white River, Hazyview, Satico, Piet Retief, Baynesfield. 2) Numerous problem areas were identified, which were not included on road plans.					
		Close-out evidence:					
		Mondi has developed a Road Management System (RMS), which has been introduced in the Richmond Area as a pilot project. The details of this system are documented in the 2003 surveillance report. Mondi has also provided a roll-out plan for the implementation of this RMS to the other areas, together with target completion dates. According to the scheduled roll-out, by November 2004, all of the Mondi Areas will have an up and running RMS. The implementation of this will be verified in future surveillance visits. This CAR is closed.					
10	1.6	Date Recorded>	2002/09/18	Due Date>	2003/09/16	Date Closed>	2003/09/16
		Non-Conformance:					
		There is a lack of commitment in adhering to the FSC principles and criteria in terms of the leased farms. This CAR replaces Major CAR 1, which was closed.					
		Objective Evidence:					
		There is evidence of neglect of the leased farms in Richmond, Hazyview and White River areas such as absence of ECDB and soil maps, absence of open area management plans, very high degree of weed infestation, no weed control plan for White River and Mellgem (Richmond). The termination of lease agreements (e.g. Stentor in Satico, Versailles in Hazyview) without informing the certification body.					
		Close-out evidence:					
		On Amsterdam WPU, leased farms Avoca and Lion's Glen were checked and there was evidence of good road maintenance, weed control and wetland delineation. On Wel Mountain WPU, Meinweiss leased farm had evidence of good weed control and general management. On Ncalu WPU, Rowley and Bam leased farms were also evidence of good management and maintenance. This CAR is closed.					
Major 11	4.2.2	Date Recorded>	2003/09/16	Due Date>	2003/10/16	Date Closed>	2003/10/29
		Non-Conformance:					
		All employees do not have access to adequate shelter and accommodation while working on the FMU.					
		Objective Evidence:					
		1) Sakhimpilo tented accommodation at Selba (Wel Mountain WPU) was unacceptable. 2) Worker accommodation at de Kaap hostel was below standard. 3) Worker accommodation at Tygerskloof below standard. 4) Outside tap drainage problems at all villages. 5) Leaking toilets at many villages. (See Table 1.7 of 2003 surveillance report for further objective evidence).					
		Close-out evidence:					
		An interim clearance of findings visit took place on 29 October 2003 in order to verify the implementation of the action plans that were submitted by Mondi. The Tygerskloof area was re-visited. It was found that the tented accommodation at Selba had been removed and the site rehabilitated. Through an environmental screening assessment process, an alternative site for accommodation was located on Mr Palmer's land (neighbour). Sakhimpilo labour interviewed indicated that they were much happier with the new site. Wonderkloof Village was also visited and found to be in good condition, with evidence of monthly checklists completed per village. In terms of Mondi villages in general, all villages on the FMU have been identified and listed per WPU. An assessment of these villages was carried out and those to be demolished were identified. The villages to remain were assessed in terms of ablution facilities, septic tanks, waste-water disposal and repairs necessary. In the case of Northern Natal Area, costs have been allocated to the necessary repairs in order to prioritise work. This CAR is closed.					
Major 12	8.3.1	Date Recorded>	2003/09/16	Due Date>	2003/10/02	Date Closed>	2003/10/02
		Non-Conformance:					

CA R #	FSC P&C	CAR DETAIL					
		<p>The chain-of-custody procedures are not being implemented at Kemp Siding/depot, resulting in the mixing of FSC certified and non-certified timber.</p> <p>Objective Evidence:</p> <p>There was no separation of certified and non-certified logs on the siding. The logs were stacked together. There was no evidence of any sign-posting of non-certified timber zones. Three conflicting procedures are available for the Kemp siding/depot, namely Document G/PM/0001/3, R. Kotze Procedure and G.R. Ray Procedure.</p> <p>Close-out evidence:</p> <p>An interim clearance of findings visit was scheduled for 2/10/2003 (2 weeks after the audit). Kemp and Iswepe sidings/depots were visited, selected specifically because they were receiving certified and non-certified timber. At both depots, certified and non-certified timber were clearly segregated in demarcated bays which were clearly signposted. At this visit, Mondi also presented a new procedure (G/PM/001/3 dated September 2003) for CoC from forest to Depots/sidings such as Kemp and Iswepe. This procedure replaces (and supercedes) all previous procedures to this effect. Pertinent aspects of the CoC checklist (AD50) were also checked at these depots (see surveillance report), and the scope of the Mondi certificate was recommended for change in order to include the CoC requirements at the various depots/sidings where mixing of timber occurs. This CAR is closed.</p>					
Major 13	6.5.3	Date Recorded>	2003/09/16	Due Date>	2003/10/16	Date Closed>	2003/10/29
		Non-Conformance:					
		Operators are not implementing adequate measures to manage or clean up oil spills. Upgraded from minor CAR 06.					
		Objective Evidence:					
		1) Extensive oil spills, lack of bunding and storage of open oil containers at Sakhimpilo tractor driver's site. 2) Crane truck at loading depot (Babanango WPU) leaking oil onto site.					
		Close-out evidence:					
		An interim clearance of findings visit took place on 29 October 2003 in order to verify the implementation of the action plans that were submitted by Mondi. The Tygerskloof area was re-visited. It was found that the Sakhimpilo tractor driver's site had been rehabilitated – oil spills had been dug up and the contaminated soil taken to the Abaqulusi Municipal registered waste site (letter from the municipality dated 20/20/03 verified this). Remaining oil that surfaced at the site was dug up and transported to a specially built oil rehabilitation site (on concrete and bunded) at the Tygerskloof Office. All contaminated soil has been treated with "Spillsorb" (bioremediation agent). A new "toolbox talk" document dealing specifically with hydrocarbon pollution, and procedures to be followed, has been drawn up and translated into Zulu. This document has been circulated throughout Mondi. In order to ascertain whether staff and contractors were now aware of the prescriptions dealing with hydrocarbon pollution prevention and remediation, numerous workers were interviewed, and all demonstrated a very good knowledge of the procedures and why such contamination was bad. This CAR is closed.					
14	4.1.10	Date Recorded>	2003/09/16	Due Date>	2004/09/16	Date Closed>	2004/10/08
		Non-Conformance:					
		Not all contractor employees are being paid a fair wage.					
		Objective Evidence:					
		CLC general silvicultural workers at Richmond Area were found to be earning a daily wage of between R20-R21 per day.					
		Close-out evidence:					
		Phephanathi Contractors, Cloggs, Sakhimpilo, M&C Forestry all checked at various areas, found to be compliant with minimum wages. Mondi has made an excellent effort to ensure compliance in this area.					

CA R #	FSC P&C	CAR DETAIL					
		Date Recorded>		Due Date>		Date Closed>	
15 Continue Monitoring	5.3.1	Date Recorded>	2003/09/16	Due Date>	2005/10/8	Date Closed>	28/10/2005
		Non-Conformance:					
		Operational harvesting plans are not of a consistently good quality.					
		Objective Evidence:					
		1) 2004 Surveillance 02 SMZ's not identified in harvesting plans at Sjonasjona F11. Felling direction not consistent with plan at Pivaanspoort. C49A.					
		Close-out evidence:					
Harvesting operations at Peak timbers compartments D302 & D304 were done according to plan. Babanango Compartments MO 27 & 28 was well planned and executed accordingly. CAR is closed.							
16	1.1.5	Date Recorded>	2003/09/16	Due Date>	2004/09/16	Date Closed>	2004/10/08
		Non-Conformance:					
		There was evidence of non-compliance with legal requirements regarding planting permits.					
		Objective Evidence:					
		1) Compartment B15c at Babanango WPU was planted without a permit or ESA. 2) No current contracts with employees (Vriendschap Boerdery) at Babanango WPU. 3) Compartment D03B at Newlands (New Hanover WPU) constitutes illegal planting.					
		Close-out evidence:					
Planting permits were checked at a sample of sites – Mkondo Area and Pivaanspoort.. No deviation from permits was detected.							
17	1.1.4	Date Recorded>	2003/09/16	Due Date>	2004/09/16	Date Closed>	2004/10/08
		Non-Conformance:					
		Where non-compliances have been identified, corrective actions have not been implemented.					
		Objective Evidence:					
		1) Inadequate close-out and follow-up of second party SHEARS at Ntonjaneni Area e.g. illegal plantings, SMZ's not on harvest plans and inadequate ESA's for crossings were all issues that re-occurred at Babanango WPU at 3 rd party assessment, after being raised at 2 nd party level. 2) Inadequate close-out details recorded for Major SHEARS on roads at Amsterdam WP, and Major SHEAR not signed off by VC manager. 3) Closure of SHEAR wrt G01 depot on Ncalu, despite insufficient progress with rehabilitation. (See Table 1.7 of 2003 surveillance report for further objective evidence).					
		Close-out evidence:					
Second party audit reports checked at Greytown, Mfolozi, Pivaanspoort, Sjonajona. A sample of CAR's was checked at each site. The CAR system is being effectively implemented in the company, no substantial deviation was found.							
18	8.3.3	Date Recorded>	2003/09/16	Due Date>	2004/09/16	Date Closed>	2004/10/08
		Non-Conformance:					
		The use of the certificate number in an incorrect format.					
Objective Evidence:							

CA R #	FSC P&C	CAR DETAIL					
		<p>Delivery note 322661 dated 9/9/2003 from Vlakkloof seen at Kemp Depot had "SGS-F-0084" stamped on it (should be SGS-FM/CoC-0084). The release form No 806 504 2684 dated 9/9/2003 at the Paulpietersberg Office had "SGS-F-0084" stamped on it.</p> <p>"World Stamp of Approval" Brochure produced by Mondi has the certificate number in the incorrect format. The logo was approved – email from SGS dated 29/10/2002 confirmed this).</p> <p>Close-out evidence:</p> <p>Iswepe siding delivery notes compliant with FSC requirements.</p>					
19	6.1.2	Date Recorded>	2003/09/16	Due Date>	2004/09/16	Date Closed>	2004/10/08
		Non-Conformance:					
		Assessments of impacts are not carried out prior to the commencement of site disturbing operations.					
		Objective Evidence:					
		1) The use of the D17a grassland to stack timber (Babanango WPU). 2) The new road below B15C was constructed without an ESA (Babanabgo WPU). 3) The ESA for the extension of Depot 8 at Tygerskloof was inadequate. The depot was within 10m from the stream in many places (Wel Mountain WPU). 4) No ESA, no drainage for crossing at Vaalkrantz Comp 77 (Wel Mountain WPU). 5) No ESA for extension of depot (Island Dam). Rehabilitation not done (New Hanover WPU). 6) No ESA for Sakhimpilo Contractor's accommodation (Wel Mountain WPU). (See Table 1.7 of 2003 surveillance report for further objective evidence).					
		Close-out evidence:					
		ESA for Black Gold operations checked at Greytown and Pivaan. Mkondo site visited. ESA's checked at Sjonajona. Assessments are being carried out, though the Black Gold operations were found to be encroaching on grasslands and other natural resources.					
20	6.1.6	Date Recorded>	2003/09/16	Due Date>	2004/09/16	Date Closed>	2004/10/08
		Non-Conformance:					
		Operations, planning and protective measures do not ensure that adverse impacts are avoided or mitigated.					
		Objective Evidence:					
		1) Fire truck filling point below Island Dam on Newlands is in a wetland (New Hanover WPU). 2) Impoundments of water by stone weir and stacking of stones from road maintenance activities on river bank on Avoca (Amsterdam WPU). 3) Sakhimpilo Contractor's accommodation on the banks of a stream (Wel Mountain WPU). 4) Mechanical excavation in De Kaap Z016 riparian zone (Barberton WPU). 5) Gum clearing by W4W above the NCT wetland resulted in debris and logs in the stream. (See Table 1.7 of 2003 surveillance report for further objective evidence).					
		Close-out evidence:					
		With the exception of the new Pivaan Black Gold operation where there was undue impact on grasslands, and where the company has raised an internal CAR, Mondi is systematically planning to avoid adverse impacts of operations such as mechanical debarking. The typical areas of timber depots on all sites, harvesting operations, roads and watercourses were found to be compliant.					
21	6.5.2	Date Recorded>	2004/10/8	Due Date>	2005/10/8	Date Closed>	28/10/2005
		Non-Conformance:					
		Buffer zones are not consistently maintained around watercourses, in compliance with best practice guidelines.					
		Objective Evidence:					

CA R #	FSC P&C	CAR DETAIL					
		<p>2004 Surveillance 02:</p> <p>While the sample showed excellent progress in buffer zone maintenance, the Sjonasjona compartments E13; F070; G04; F08b all had trees planted through drainage lines. At Pivaanspoort C34 and C35 trees in riparian zone not scheduled for excision. Not possible to close CAR.</p> <p>Close-out evidence:</p> <p>Peak timbers showed a phased approach to the problem with only the A & B compartments compliant at this stage. The D compartments are planned and scheduled. The rest of the sites in White River, Tygerskloof and Babanango were compliant.</p>					
22	7.1.13	Date Recorded>	2003/09/16	Due Date>	2004/09/16	Date Closed>	2004/10/08
		<p>Non-Conformance:</p> <p>Inadequate implementation of own plans; inadequate justifications of deviations from rate of progress.</p> <p>Objective Evidence:</p> <p>1) F19 and B11 Seele no documentation of weather conditions on slash burning permit. 2) Glen Eland/Avoca/Lions Glen burning patterns deviated from burning plans. 3) Road maintenance not on schedule at D02 Newlands and Hillerman A19. 3) Weed control plan at Ncalu not being implemented, Rocky Glen weed control plan not being implemented, Z016 Rocky Glen not burnt as prescribed in plan. (For further evidence see Table 1.7 in 2003 surveillance Report).</p> <p>Close-out evidence:</p> <p>Weather conditions documented on slash burning permits at Pivaan, burning plans implemented at Greytown, Pivaan. Weed control measures implemented according to plan at Nyalazi. PRA's implemented according to plan at Pivaan.</p>					
23	2.2.3 CoC Checklist	Date Recorded>	2003/10/02	Due Date>	2004/09/16	Date Closed>	2003/10/29
		<p>Non-Conformance:</p> <p>Training and experience records for chain of custody are not maintained.</p> <p>Objective Evidence:</p> <p>Not maintained for Kemp Depot and Iswepe Depot.</p> <p>Close-out evidence:</p> <p>FSC CoC Training records (for September and October 2003) with names, signatures and dates were presented to the Auditor on 29th October 2003. This training included the people involved in the Kemp and Iswepe depots of the Kraft Value Chain. This CAR is closed, but the effectiveness of the training will need to be verified through interviews at the next surveillance visit.</p>					
Major 24 (Closed down graded to Minor 30)	Clause 6.2	Date Recorded>	2004/10/8	Due Date>	2004/11/8	Date Closed>	2004/11/18
		<p>Non-Conformance:</p> <p>Rare threatened and endangered species are not consistently monitored, recorded or reported at estate level.</p> <p>Objective Evidence:</p> <p>Sightings of fauna are not consistently recorded at Umfolozi or Sjonasjona in spite of regular sightings.</p> <p>Close-out evidence:</p> <p>A written submission has been received which outlines the companies approach to dealing with this CAR.</p>					

CA R #	FSC P&C	CAR DETAIL					
		Date Recorded>		Due Date>		Date Closed>	
Minor 25	Cause 6.9.2 7.1.9	Date Recorded>	2004/10/8	Due Date>	2005/10/8	Date Closed>	28/10/2005
		Non-Conformance:					
		The control of unwanted generation of exotic species is not effectively controlled.					
		Objective Evidence:					
		At Nyalazi Z17 GC clones had not been treated according to best practice; at Sjonasjona bug-weed was slashed but not treated simultaneously, at Pivaanspoort GC clones were also coppicing indicating late treatment.					
		Close-out evidence:					
Upgraded to Major CAR 31.							
Minor 26	Clause 8.1 8.2 8.4 10.4	Date Recorded>	2004/10/8	Due Date>	2005/10/8	Date Closed>	28/10/2005
		Non-Conformance:					
		Monitoring to assess the condition of the forest, yield of products, management activities and environmental impacts with regard to fragile affected environments is not done. It is also not brought into the management plan.					
		Objective Evidence:					
		Marginal sites at Pivaanspoort C34 and Sjonasjona C1B was not monitored to establish it's continual use. On request at Sjonasjona no monitoring management plan was available.					
		Close-out evidence:					
Based on the monitoring results, Peak Timber was able to implement a conversion process up until 2010 between Pine and gums to optimize the FMU. At Tygerskloof no marginal sites were observed and at Babanago/ Merloth the process of establishing poor growth sites were still in process and includes the conversion of wattle jungles. . CAR is closed.							
Minor 27	Clause	Date Recorded>	2004/10/8	Due Date>	2005/10/8	Date Closed>	8/9/2006
		Non-Conformance:					
		Relevant contract legislation not adhered to at Umfolozi.					
		Objective Evidence:					
		Contractor Sindi Ndlazi had no legal contract, as well as other contractors at Umfolozi. 2005 Progress: Mondi has appointed a dedicated contractor support unit. Once the need for a contract is established it is advertised in local newspapers. Potential contractors can attend a field day and are provided with the relevant criteria for selection. Currently all contracts with contractors are not signed and in place. This is due to the restructuring process within Mondi and a move towards Evergreen contracts. Most contracts should be in place by the end of 2005. Existing car on this issue could not be closed yet.					
		Close-out evidence:					
Contractor agreements were inspected in Paul Pietersburg and were all signed. HR department actively involved in the process and it forms part of contractor compliance audits. The silvicultural operations of McComb & Clark were visited. CAR closed.							
Minor 28	Clause 6.7	Date Recorded>	2004/10/8	Due Date>	2005/10/8	Date Closed>	28/10/2005
		Non-Conformance:					
		Waste is not disposed of in an environmentally appropriate manner.					

CA R #	FSC P&C	CAR DETAIL					
		<p>Objective Evidence:</p> <p>Nyalazi Non-organic waste was found in organic waste pit.</p> <p>Sjonasjona: Used oil (800 l +) were not bunted for more than 6 months despite doc no E/MP/005/1 of January 2003. Prescribing waste disposal.</p> <p>Sjonasjona. Used tyres on roadside and next to road in Celtis Pass is not disposed of correctly.</p> <p>Close-out evidence:</p> <p>The waste pit at the White river nursery was well managed. A small new pit was in use only meters away at the clinic that was immediately closed and rehabilitated. Tygerkloof had an internal CAR on the fencing of the waste pit that is being addressed. In the Babanango region waste was well managed and Rooipoort village were using cages to prevent baboons from opening bags and spreading the content. CAR is closed.</p>					
Minor 29	Clause 6.1.6	Date Recorded>	2004/10/8	Due Date>	2005/10/8	Date Closed>	28/10/2005
		<p>Non-Conformance:</p> <p>Operations, planning and protection measures do not ensure that adverse impacts are avoided when conducting screening assessments.</p> <p>Objective Evidence:</p> <p>Black Gold Sites at Kleuver and Pivaanspoort had environmental impacts that were not addressed by the Environmental Screening Assessment. Impacts like soil scorching, waste management, bark build-up and demarcation is not addressed. The assessments were not approved, signed or dated, while development already took place and are operational.</p> <p>Close-out evidence:</p> <p>Tygerskloof had an internal CAR for the upgrading of a road without the EIA. Its been well addressed internally. EIAs were well done at the waterworks at Minhoop water project at Babanango. CAR is closed.</p>					
30		Date Recorded>	2004/10/08	Due Date>	2005/10/08	Date Closed>	28/10/2005
		<p>Non-Conformance:</p> <p>Rare threatened and endangered species are not consistently monitored, recorded or reported at estate level.</p> <p>Downgraded from Major 24 after receipt of a written submission.</p> <p>Objective Evidence:</p> <p>Sightings of fauna are not consistently recorded at Umfolozi or Sjonasjona in spite of regular sightings.</p> <p>Close-out evidence:</p> <p>The sightings of RT&E species is backed up by an awareness program that keeps all staff aware and familiarise them with these species. Good examples were seen at Tygerskloof. CAR is closed.</p>					
M 31	6.9.2, 7.3.3 7.1.13	Date Recorded>	2005/10/28	Due Date>	Next surv	Date Closed>	8/9/2006
		<p>Non-Conformance:</p> <p>Alien weeds are not adequately controlled. Operations not supervised and progress and deviation monitored.</p> <p>Objective Evidence:</p>					

CA R #	FSC P&C	CAR DETAIL					
		<p>The progress with the weed control program is slow. Pigs peak Block D still uncontrolled. Tygerskloof Compartment Z 037 & Z036 were indicated as being done but were not completed. Melmoth drainage lines infested with gum and bugweed.</p> <p>Close-out evidence:</p> <p>Closed as major, but raised as minor 38.</p> <p>It is closed as a Major but raised as a minor 38 for the following reasons. Refer to previous CAR 25 of 2004. The practice of slashing bugweed without treating it is still present and the evidence was found in Mkondo region. The repetitive nature of this problem prevents the CAR from being closed. Weeds were also addressed in CARs 08 of 2002 as well as 68 from the previous cycle.</p> <p>As mitigating for not remaining as a major the following was taken in consideration. Mondi has developed a comprehensive weed control strategy with dedicated timeframes to address the weed infestation on all their land. The goals and targets are realistic and there was commitment throughout the FMUs visited to adhere to the targets set. It also provides for an auditable framework against which performance of the company can be measured.</p>					
32	4.1.7	Date Recorded>	2005/10/28	Due Date>	Next surv	Date Closed>	8/9/2006
Non-Conformance:							
The company has no controls in place to ensure that labour from contractors are being paid the minimum wage and receive their benefits.							
Objective Evidence:							
There is a contractor compliance audit in place, but no formal system is in place to verify the salaries and benefits provided by contractors. Foresters in Swaziland conduct ad hoc auditing of wages and benefits but it is not included in the contractor compliance audit checklist.							
Close-out evidence:							
A consultant (U Weisbach from FEOSA) was used to workshop labour related issues with the contractors at Northern Natal region. Amongst other the minimum wages were addressed. All contractors signed a notice that they understand and agree to implement it. It was also brought into the auditors compliance internal audit checklist and is monitored by Mondi.							
33	10.6.2	Date Recorded>	2005/10/28	Due Date>	Next surv	Date Closed>	8/9/2006
Non-Conformance:							
Degraded areas are not adequately planned, mapped and where necessary rehabilitated.							
Objective Evidence:							
Open areas on Babanango showed several eroded areas that was not planned or mapped.							
Close-out evidence:							
A degraded site was visited at Scuderia Z29 where substantial rehabilitation work took place. Although still in progress it was evident that it was well planned and implemented. The CAR is closed.							
34	2.1.1	Date Recorded>	2005/10/28	Due Date>	Next surv	Date Closed>	8/9/2006
Non-Conformance:							
There is no current documentation showing the legal rights to manage leased forest land in Swaziland.							
Objective Evidence:							
Contracts to manage 399 ha of municipal leased land and 153 ha crown land expired in 1985. There are currently no contractual agreements to manage municipal or crown lands. These contracts are currently in a process of being renewed but are not signed.							

CA R #	FSC P&C	CAR DETAIL					
		Close-out evidence:					
		Negotiations are still taking place regarding the lease and the amounts to be paid. New developments are that the Swaziland operations are changing to saw timber rotation to add value within Swaziland. This change then no longer fit the Mondi resource requirements for pulp and all is being sold. CAR is closed.					
35	8.1.5 4.2.9	Date Recorded>	2005/10/28	Due Date>	Next surv	Date Closed>	8/9/2006
		Non-Conformance:					
		Drinking water not adequately monitored and corrective actions not taken when monitoring results indicate problems.					
		Objective Evidence:					
		Tyger kloof Village water last tested in 2003. Garfield compound monitoring results indicated a faecal coli form count > 100 (standard 0) VG house monitoring results indicate Heterotrophic plate counts > 10 000 with the norm as 1000. Tests for Garfield compound and VG House were conducted in November 2004 but no corrective actions were implemented as of yet.					
		Close-out evidence:					
		All water monitoring requirements were in place and up to date in the Northern Natal district.					
Major 36	7.1.13	Date Recorded>	2006/9/8	Due Date>	Next surv	Date Closed>	9/10/2006
		Non-Conformance:					
		Mondi's Silvicultural guidelines are not followed and adequately implemented in the issuing of slash burning permits.					
		Objective Evidence:					
		Refer to previous CAR 22. of 2003. Not all required weather and related detail on the permit form is completed when issuing the permit. Permits in Piet Retief are all incomplete.					
		Close-out evidence:					

CA R #	FSC P&C	CAR DETAIL					
		<p>Action plan for the closing of the major CAR received. No need for follow –up visit.</p> <p><u>Actions to Close out CAR</u></p> <ol style="list-style-type: none"> 1. Our present Silviculture Procedures manual (SPM) states on page 12 that “... <i>Mondi Forests favours slash retention and subscribes to a ‘no-burn’ policy. However, where there is a high risk of fire on (external boundaries) or where excessive residues have accumulated, increasing the fire risk, burning may, with justification and permission, be carried out. Mondi’s approach to slash management is therefore one of <u>not burning as a rule and burning as the exception.</u></i>” 2. Our revised manual will be similarly worded but will have to state more clearly that certain districts are obliged to burn as a standard practice because of the threat of fires posed to them. 3. However, this inclusion in the new manual will place greater responsibility on the operational staff to ensure that their prescribed burns of harvest residues are not causing permanent damage to the site and every effort will have to be made to ensure that burns are only done on cool days or preferably at night when there is less chance of a flare-up. 4. There are burning algorithms drawn up by the ICFR that are available on our Mondi GIS that indicate site sensitivity to burning and shows which site may or may not be burnt. Every operational area should have copies of these maps and this information will be included in our silviculture precision tool as has been done on the Zululand coast. 5. The slash burn permit will have to be revised to take into account the inspection of the site after the burn and the findings will have to be recorded. 6. We are looking very closely at other methods of slash management that will allow us to exclude burning to a large degree. <p>CAR closed</p>					
M37	6.7	Date Recorded>	2006/9/8	Due Date>	Next surv	Date Closed>	9/10/2006
Non-Conformance:							
Waste is not disposed of in an environmentally appropriate manner.							
Objective Evidence:							
Refer to previous CAR 28 of 2004. Tyres being found in the field at Vrede F122. & Kwambonambi close to harvesting operations.							
The area surrounding a private village on Mooihoek is littered with waste. No waste management system is in place.							
Close-out evidence:							

CA R #	FSC P&C	CAR DETAIL				
		<p>Action plan for the closure of major CAR received. No follow-up visit required.</p> <p><u>Actions to close out CAR:</u></p> <ol style="list-style-type: none"> 1. Survey to be conducted across the Forest Management Unit(FMU) to identify soild waste "illegally" disposed of on the FMU. <u>31st January 2007</u> 2. Register of all "illegally" disposed soild waste to be compiled, prioritised for removal considering the economical viability of such efforts. <u>28th February 2007</u> 3. Removal of "illegally" disposed solid waste. <u>Ongoing</u> 4. Policing of known dumping sites to be initiated on an ad hoc basis. <u>Ongoing</u> <p>CAR closed.</p>				
38		Date Recorded>	2006/9/8	Due Date>	Next surv	Date Closed>
Non-Conformance:						
Alien weeds are not adequately controlled. Operations not supervised and progress and deviation monitored.						
Objective Evidence:						
Refer to Major Car 31 of 2005. It is closed as a Major but raised as a minor 38 for the following reasons. Refer to previous CAR 25 of 2004. The practice of slashing bugweed without treating it is still present and the evidence was found in Mkondo region. The repetitive nature of this problem prevents the CAR from being closed. Weeds were also addressed in CARs 08 of 2002 as well as 68 from the previous cycle.						
As mitigating for not remaining as a major the following was taken in consideration. Mondi has developed a comprehensive weed control strategy with dedicated timeframes to address the weed infestation on all their land. The goals and targets are realistic and there was commitment throughout the FMUs visited to adhere to the targets set. It also provides for an auditable framework against which performance of the company can be measured.						
Close-out evidence:						
39	8.1.3	Date Recorded>	2006/9/8	Due Date>	Next surv.	Date Closed>
Non-Conformance:						
Consistent monitoring procedures not documented for activities with potential negative impacts.						
Objective Evidence:						
Monitoring the effects of fire impact after slash burning not adequately addressed by the current permit system.						
Close-out evidence:						

5. RECORD OF STAKEHOLDER COMMENTS AND INTERVIEWS

Nr	Comment	Response
SURVEILLANCE 1		

Nr	Comment	Response
	Refer separate report	
SURVEILLANCE 2		
	Refer separate report	
SURVEILLANCE 3		
	No Stakeholder comments were received and none were interviewed.	
SURVEILLANCE 4		
	Some negative publicity was recently expressed in newspapers. It was not specific to the company and generally at the forestry industry.	The audit was conducted in the normal way, focusing on the issues normally addressed during the audits. Although the issues mentioned in the negative publicity were kept in mind during the audit they were evaluated during normal auditing procedures and not individually addressed. They were not company specific.

6. RECORD OF COMPLAINTS

Nr	Detail		
	Complaint:	Date Recorded >	28/10/2005
	Iain Buchan, New owner of Portion of Gallo lease, raised concerns regarding harvesting impacts and weed control.		
	Objective evidence obtained:		
	Close-out information:	Date Closed >	8/ 9 /2006
	This complaint was for Shanduka and not Business paper		
	Complaint:	Date Recorded >	
	No complaints were received.		
	Objective evidence obtained:		
	Close-out information:	Date Closed >	

7 RECORD OF OBSERVATIONS

OBS #	Observation Detail			
	1	Date Recorded>	28/10/2005	Date Closed>
	Observation:			
	Contractor support – Good that there is a dedicated office with staff to support contractors.			
	Follow-up evidence:			

OBS #	Observation Detail		
	Positive statement. No follow-up required.		
2	Date Recorded>	28/10/2005	Date Closed> 28/10/2005
	Observation:		
	Fountain Nursery – Unannounced visit found virtually no FSC non-compliances. Shows that FSC is becoming a way of living for nursery people.		
	Follow-up evidence:		
	Positive Statement: No follow- up required.		
3	Date Recorded>	28 / 10 / 2005	Date Closed> 28/10/2005
	Observation:		
	Infrastructure projects for communities – e.g. Masisizane School for Disabled – Melmoth.		
	Follow-up evidence:		
	Positive statement no follow-up required.		
4	Date Recorded>	28 / 10 / 2005	Date Closed> 28/10/2005
	Observation:		
	Well worked out training matrix for contractor training with SA Forestry Training College.		
	Follow-up evidence:		
	Positive Statement no follow-up required.		
5	Date Recorded>	28 / 10 / 2005	Date Closed> 28/10/2005
	Observation:		
	Contractor Health and Safety in generally good – compliment on Phepha programme – good safety and accident free record.		
	Follow-up evidence:		
	Positive statement: No follow-up required.		
6	Date Recorded>	28 / 10 / 2005	Date Closed> 28/10/2005
	Observation:		
	Stakeholder consultation process – good under the SEAT system. Good tool but Community Facilitators should conform on system. Also just a tool to collect info and not a tool to resolve disputes etc. Excellent work by Nosipho Fuzani and Walter Shandu.		
	Follow-up evidence:		
	Positive statement		
7	Date Recorded>	28 / 10 / 2005	Date Closed> 28/10/2005
	Observation:		
	Senior manager attended the whole audit which indicates commitment to FSC.		
	Follow-up evidence:		
	Positive statement require no follow-up.		
8	Date Recorded>	28 / 10 / 2005	Date Closed> 8 / 9 / 2006
	Observation:		
	Although grazing assessments were done, a controlled permit system is not in place in Swaziland and only partially functional in Babanango.		
	Follow-up evidence:		

OBS #	Observation Detail			
	Swaziland not part of the audit in 2006. Veld condition assessments were done at grassland sites and give indication on any changes needed.			
9	Date Recorded>	28 / 10 / 2005	Date Closed>	8/9/2006
	Observation:			
	No real system to assess payment of wages by contractors. Not included in Contractor Compliance Assessment and only done on an ad hoc basis – CAR raised 4.1.7.			
	Follow-up evidence:			
	It is included in the internal contractor compliance audits.			
10	Date Recorded>	28 / 10 / 2005	Date Closed>	dd MMM yy
	Observation:			
	The compound at Peak plantations did not form part of the sample and should be included in the next site visit.			
	Follow-up evidence:			
	Peak not part of the audit in 2006			
11	Date Recorded>	28 / 10 / 2005	Date Closed>	8/9/2006
	Observation:			
	Told by community facilitators at White River that there were no complaints received during last 2 years – questionable – look at better ways of assessing community needs – SEAT or PRA to improve data gathering.			
	Follow-up evidence:			
	Issues are assessed through the SEAT system and where Mondi can change things it is incorporated into the SEAT and other community projects. Some community complaints are beyond the control of Mondi and has to go through different social structures, yet stil end up with Mondi, sometimes it is the only ear.			
12	Date Recorded>	28 / 10 / 2005	Date Closed>	8/9/2006
	Observation:			
	Contractor contracts – open CAR on contracts not signed with contractor at Umfolozi. Found large number of contracts not signed – so not possible to close CAR – not raised to Major as process is in place to sign contracts and to move to evergreen contracts			
	Follow-up evidence:			
	All contractor agreements are signed.			
13	Date Recorded>	28 / 10 / 2005	Date Closed>	8/9/2006
	Observation:			
	Empty fire extinguisher at Babanango Kop fire lookout – isolated incident.			
	Follow-up evidence:			
	Isolated incident and extinguisher replaced.			
14	Date Recorded>	8/9/2006	Date Closed>	
	Observation:			
	It was observed that there is no direct auditing or control over the sites leased by other companies such as Black Gold.			
	Follow-up evidence:			

OBS #	Observation Detail		
	15	Date Recorded>	8/9/2006
Observation:			
Good social programs in the Piet Retief Area. Implementation of SEAT and Participatory Rural Appraisal systems.			
Follow-up evidence:			
Positive observation require no follow up.			

7. MAINTENANCE OF CERTIFICATION

During the surveillance evaluation, it is assessed if there is continuing compliance with the requirements of the Qualifor Programme. Any areas of non-conformance with the QUALIFOR Programme are raised as one of two types of Corrective Action Request (CAR):

- i. Major CARs - which must be addressed and closed out urgently with an agreed short time frame since the organisation is already a QUALIFOR certified organisation. Failure to close out within the agreed time frame can lead to suspension of the certificate.
- ii. Minor CARs - which must be addressed within an agreed time frame, and will normally be checked at the next surveillance visit

The full record of CARs raised over the certification period is provided above.

The table below provides a progressive summary of findings for each surveillance. A complete record of observations demonstrating compliance or non-compliance with each criterion of the Forest Stewardship Standard is contained in a separate document that does not form part of the public summary.

SURVEILLANCE 1	
Issues that were hard to assess	Refer separate report
Number of CARs closed	Refer separate report
Nr of CARs remaining open	Refer separate report
New CARs raised	Refer separate report
Certification Decision	Refer separate report
SURVEILLANCE 2	
Issues that were hard to assess	Refer separate report
Number of CARs closed	Refer separate report
Nr of CARs remaining open	Refer separate report
New CARs raised	Refer separate report
Certification Decision	Refer separate report
SURVEILLANCE 3	
Issues that were hard to assess	The Swaziland plantations require more time and cannot just be taken as one other Mondi site. There are differences in operations, terrain, legal and customary issues that require more in depth verification.
Number of CARs closed	6 Outstanding CARs were closed.

Nr of CARs remaining open	1 Outstanding CAR from previous evaluations was not closed.
New CARs raised	1 New Major CAR and 4 Minor CARs were raised.
Certification Decision	<p>The forest management of the forests of Mondi Business Paper South Africa remains certified as:</p> <ul style="list-style-type: none"> ▪ The management system is capable of ensuring that all of the requirements of the applicable standard(s) are met over the whole forest area covered by the scope of the evaluation; and <p>The certificate holder has demonstrated, subject to the specified corrective actions, that the described system of management is being implemented consistently over the whole forest area covered by the scope of the certificate.</p>
SURVEILLANCE 4	
Issues that were hard to assess	None
Number of CARs closed	6 CARs were closed.
Nr of CARs remaining open	0 CARs remain open.
New CARs raised	4 New CARs were raised, two being major CARs. They were upgraded to major purely because it was mentioned at previous CARs and not because of significance.
Certification Decision	<p>The forest management of the forests of Mondi Business Paper South Africa remains certified as: 2 Major CARs are closed out on 9/10/2006</p> <ul style="list-style-type: none"> ▪ The management system is capable of ensuring that all of the requirements of the applicable standard(s) are met over the whole forest area covered by the scope of the evaluation; and <p>The certificate holder has demonstrated, subject to the specified corrective actions, that the described system of management is being implemented consistently over the whole forest area covered by the scope of the certificate.</p>

END OF PUBLIC SUMMARY