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|  <b>SGS Forestry</b> | <b>MAIN ASSESSMENT REPORT</b> <b>SUMMARY</b><br><b>PAGE</b> |                            |
|   | <b>QUALIFOR Programme</b>                                   | <b>Company:</b>            |
|   | <b>Forest Area:</b>   | <b>Eastern Cape Region</b> |


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## Forest Certification Public Summary Report


|                                |   |
|--------------------------------|---|
| <b>Project Number:</b>         | 6093 za   |
| <b>Certified Organisation:</b> | SAFCOL  |
| <b>Country:</b>                | South Africa  |
| <b>Certified Area:</b>         | Eastern Cape Region - 42,714 ha   |
| <b>Main species/products:</b>  | Pine sawlogs, pine poles  |
| <b>Annual production:</b>      | 35,000 m <sup>3</sup>   |
| <b>Assessment date:</b>        | 16 - 20 March   |
| <b>Certificate Number:</b>     | 0755/6093/0123  |
| <b>Date of Issue:</b>          | 22.05.98  |
| <b>Duration:</b>               | 5 years   |
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| <b>Date:</b>                   | 22.05.98  |

For details of related chain-of-custody certificates, please contact the QUALIFOR Administrator at the address above.

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## SECTION I - PUBLIC SUMMARY REPORT

### INTRODUCTION AND SCOPE

This report presents the results of an assessment of SAFCOL's forest management operations in the Eastern Cape Province of South Africa. SAFCOL Eastern Cape Region consists of three Districts, namely Tsitsikamma, Algoa, and Amatola. Each District is sub-divided into two or three plantations, amounting to a total number of plantations within the Region of seven. Planted areas are as follows:


| Area  | Total Area (ha)               | Average Production (m <sup>3</sup> ) |
|---|-------------------------------|--------------------------------------|
| Tsitsikamma District <ul style="list-style-type: none"> <li>• Lottering Plantation</li> <li>• Bluelliesbush Plantation</li> <li>• Keurboomsrivier Plantation</li> </ul> | 6 022.2<br>6 824.6<br>2 838.1 |                                      |
| Algoa District <ul style="list-style-type: none"> <li>• Longmore Plantation</li> <li>• Witelsbos Plantation</li> </ul>  | 10 676.4<br>6 227.2           |                                      |
| Amatola District <ul style="list-style-type: none"> <li>• Kubusie Plantation</li> <li>• Hogsback Plantation</li> </ul>  | 7 257.4<br>2 868.1            |                                      |
| <b>Total</b>  | <b>42 714.0</b>               | <b>35,000 per annum</b>              |

With regard to areas of natural vegetation, the region is transferring title to many of these to public conservation bodies - see section 2.

The assessment was carried out by SGS Forestry during the period 16 to 20 March, 1998. The purpose was to assess the operations against the requirements of the QUALIFOR Programme, SGS's forest certification programme accredited by the Forest Stewardship Council. This includes all the requirements of the Forest Stewardship Council's Principles and Criteria (FSC P&C) as well as locally-specific requirements from the following:

Forest Industry Environmental Committee, 1995, Guidelines for Environmental Conservation Management in Commercial Forests in South Africa.

Forest Engineering Working Group of South Africa (FESA), 1995, South African Harvesting Code of Practice.

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## **CERTIFIED ORGANISATION BACKGROUND**


SAFCOL commenced operations in 1993 as a result of a re-organisation of the government forestry service, with a remit to manage the state-owned plantations and processing capability on a commercial basis. SAFCOL Forests and SAFCOL Processing exist as separate divisions. The Department of Water Affairs and Forestry (DWAFF) and SAFCOL ratified an agreement in 1994, to provide SAFCOL with rights to the relevant state forests; major indigenous forest areas were excluded from the agreement, and remained under the management of DWAFF. The land managed by SAFCOL remains in the ownership of the Ministry of Public Works. SAFCOL reports to the Minister for Public Enterprises through the Board of Directors.

The government has now stated that it intends to privatise SAFCOL, and the latest indications are that this will be implemented through long-term lease of the land holding, and the sale of the growing stock and other assets.

Associated with the privatisation of SAFCOL are on-going negotiations with government departments to 'rationalise' SAFCOL's landholding, in terms of the transfer of large blocks of natural vegetation (forested and grassland) to the DWAFF and/or the provincial Parks Boards. This is under consideration where these areas are on the periphery of SAFCOL plantations, contiguous with other natural vegetation under the management of these departments. Such areas can then be managed more coherently to maximise environmental benefits.

Eastern Cape Region is one of five geographical divisions within SAFCOL, which in total manages around 260,000 ha of forestry landholdings in South Africa. Three of the regions have already been assessed and certified under the QUALIFOR Programme. The company also owns 7 processing facilities: 5 sawmills and 2 plants for telegraph pole manufacture.

Of the 42,000 ha of planted area within the Eastern Cape Region, over 95% is under pine with very small proportions under *Eucalyptus* and *Acacia* species. 73 % of the production in Eastern Cape Region consists of pine sawlogs, a figure projected to rise to around 88%. Sawlogs are supplied under contract to both SAFCOL Processing mills and privately owned mills. The remainder of the production comprises mainly pine poles. Current total production from SAFCOL Eastern Cape is approximately 35,000 cubic metres per annum.

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## **FOREST MANAGEMENT SYSTEM**

### **Bio-physical setting**

Climate and effect of fires have confined natural forests to approximately 327,600 ha or 0.2% of South Africa's land area. Although the natural forest has been depleted over the past three centuries, some has survived. Most natural forest occurs in the Eastern Cape (140,000 ha) and in KwaZulu-Natal (91,200 ha), followed by the Western Cape (60,000 ha) and the Northern Province and Mpumalanga (35,000 ha). These forests are mostly small and scattered with the largest and second largest being 1,800 and 700 ha. The conservation value of natural forests is recognised and the areas as such preserved. Most of these forests are owned by the State. DWAf and provincial conservation authorities are responsible for the management of indigenous forest and areas of other types of natural indigenous vegetation.


Rainfall governs the extent of plantations, both directly and indirectly. Areas which receive more than 850 mm of rain per year and have a mean temperature greater than 14°C are preferred for pines and eucalyptus. In the past plantations were always established in the wettest and therefore highest altitude areas on former grassland. In recent years legislation controlling planting, based on concerns regarding water consumption by plantations, has increased significantly. Due to hydrological constraints, there are now relatively few areas where new plantations can be established. Those water catchments supplying conurbations or important farming areas, have a total ban on tree planting. This will prevent the forestry sector from expanding significantly in area for the foreseeable future.

### **History of use**

Commercial forestry was initiated in the last quarter of the nineteenth century with government projects. Planting was originally aimed at supplying the mining sector with pit props. Wattle, pines and eucalyptus were brought in from Australia, America and Europe at the turn of the century and the area under plantation increased rapidly from 1920 onwards.

By 1997, the area of commercial plantations had grown to about 1.49 million ha, comprising, 55% pine, 37% eucalyptus, 7% wattle and 0.6% other hardwoods. The largest plantation areas are in Mpumalanga Province (624 000 ha) and KwaZulu Natal (532 000 ha). The area currently afforested amounts to a significant fraction of the total area of these regions that are biologically suitable for forestry. Current establishment rate is approximately 17,000 ha per year.

Potential productivity (yet to be fully realised) of these forests is relatively high by world standards, averaging about 20m<sup>3</sup> per ha per

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annum. They currently yield about 18.5 - 19 million m<sup>3</sup> per year, which satisfies over 90% of domestic demand and provides for a surplus for export, largely as pulp, paper, wood chips and other products. The average realised yield of about 13m<sup>3</sup> per ha per annum is lower than average potential productivity, because many plantations are still young. Neglect of some industrial forests, such as in the former homelands, also contributes to poor realised yields.

### **Planning process**

SAFCOL corporate strategy is guided by Mission and Vision statements, emphasising business performance, technical management excellence and opportunities for employees. A SAFCOL Forests Vision and Strategy sets the focus on high perceived value product (“the benchmark in pine sawlogs”), growth and people. Key issues and priorities are identified in a 5-year Strategic Business Plan, which are reflected in medium-term business plans at regional level. Each region within SAFCOL Forests exists as a separate business unit.

Management planning within SAFCOL Eastern Cape is carried out at two main levels: Strategic and Operational planning. Forest planning is based on sustained yield principles: to manipulate the age-class distribution of the forest in order to supply a consistent annual volume in perpetuity.


Strategic planning consists of 30-year yield regulation predictions which permit the planning of expected production and revenues, known as the COMPAS system. Yield predictions are made on the basis of current compartment register data; growth data determined through on-going sampling; and growth models developed by an industry-wide programme of PSPs and spacing trials.

30 year Working Plans are maintained for each plantation. Within each Working Plan a rolling 5-year plan is maintained. Working plans are updated annually by the Planning Department in the Regional Office. This details for each plantation the compartments planned for felling, thinning (first, second and third), pruning, and planting.

Operational planning is covered in the Annual Plan of Operations (APO). This is carried out for each plantation and updated monthly. The APO consists of a compartment register detailing all compartments to be felled, thinned, pruned, planted, burned, slashed, etc. The APO contains all compartments planned for operations within the 5-year plan, plus any compartments which have been ‘left over’ from the previous year and any unplanned operations.

The APO is updated monthly by the Regional Office, according to reports of operations provided by the plantation office.

### Conservation Management Planning

|   |                               |                            |               |
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Environmental issues are traditionally not covered by the management planning process described above. However, 5-year Conservation Management Plans have recently been produced, or are still under preparation, for each plantation, containing a description of the physical and biotic environment, main issues and priorities, and management prescriptions.

Location-specific prescriptions for conservation areas and sites of special significance are then detailed annually, analogous to the APO process.

Conservation management planning and site prescriptions are based on the current process of field surveys, undertaken as part of the introduction of a new, GIS-based system. All non-productive and conservation lands are being mapped for inclusion in the database, which will permit integrated planning for timber and conservation management. Vegetation mapping has now been completed on 6 of the 7 plantations.

### **Harvest and regeneration**


Most plantations within SAFCOL Eastern Cape have a harvesting and a silvicultural forester. The former typically controls harvesting and thinning operations, either by SAFCOL's own teams or harvesting contractors; the latter controls all other activities (also using either direct employees or contractors). Final crops are clearfelled at harvest, and regenerated through planting.

Harvesting systems typically utilise grapple-skidders and/or cable-skidders, with some use of cable-yarding in steeper areas and a new mechanised system in Tsitsikamma District.

SAFCOL are committed to compliance with the FESA Harvesting Code of Practice which prescribes techniques for harvest planning, felling, debranching and cross-cutting, extraction systems and loading. Requirements for compartment planning and recommended terrain conditions for different methods of felling and extraction are described. Additional considerations regarding environmental management are contained in the Guidelines for Environmental Conservation Management.

The application of these various guidelines is controlled by the harvesting forester. All plantations within the region utilise compartment maps (either hand-drawn or computer generated), and have introduced post-harvest audits.

Regeneration operations are described in the SAFCOL Timber Growing Policy. Planting restrictions according to slope and soil erodibility are provided in the Guidelines for Environmental Conservation Management. Buffer zones are left unplanted around wetlands and streams and cultural sites.

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As compartments are felled and restocked, it is intended to return areas which should not be planted, but currently carry a commercial crop, to natural vegetation, and gradually integrate the management of unplanted areas within overall management planning.

### **Silviculture**

The silvicultural systems employed by SAFCOL Eastern Cape are well defined, based on research and subject to frequent review. Plantations have a silvicultural forester in charge of all silvicultural work. The silvicultural systems are described in the Timber Growing Policy. Methods and regimes for establishment, fertilisation, tending, pruning and thinning are established. A silvicultural audit system has been implemented to evaluate silvicultural performance as compared to the guidelines set out in the Policy manual.

### **Monitoring processes**

There are four strands to monitoring within SAFCOL Eastern Cape: growth and yield monitoring; operational monitoring (through post-harvest and silvicultural audits); biennial environmental audits; and long-term data collection.

Growth and yield monitoring is based on an on-going sampling programme involving repeated measurements on particular sites.

Post-harvest operational monitoring is carried out by individual foresters checking activities of their own and contractors' teams, against a standard checklist. A standard checklist is also used for annual silvicultural self-assessment.


Environmental audits are undertaken with the use of standard checklists/pro-formas by the Environmental Manager, in co-ordination with the plantation manager.

SAFCOL Eastern Cape participates in a variety of long-term data collection initiatives, including compaction trials relating to the mechanised harvesting system, and programmes at the Plant Protection Research Institute (PPRI).

## **SOCIO-ECONOMIC AND ENVIRONMENTAL CONTEXT**

### **Social aspects**

South Africa is currently undergoing a phase of rapid and far-reaching socio-political transformation, as a direct result of the election of the country's first democratic government in 1994. The new government has embarked on an ambitious programme of policy and legislative reform for national reconstruction and development. The translation of changing policy and legislation into a clear set of acceptable social norms and standards for the forestry industry is still

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at a very early stage. This complicates the task of undertaking the social aspect of forestry certification assessment. Key social issues in forestry in South Africa are land tenure, contract workers and unionisation.

Land tenure Legislation has been recently passed in South Africa to protect vulnerable rural communities who occupy privately owned land from random evictions by land owners, and to restore land rights to those who were evicted from land in the past. Forestry companies have in the past been guilty of evictions. The White Paper on South African Land Policy (1997) lays out a national land reform programme. Procedures for lodging land restitution claims are in place in all provinces. All claims have to be screened by Regional Land Claims commissioners and the land owner informed. At that point the parties are urged to negotiate a solution, failing which the case will go before the land claims court.

Contractor workers Since the mid 1980s, forest companies have been moving towards a system of contracting out forestry operations to independent operators and reducing the number of company employees. This trend has caused major concern amongst labour rights groups nationally among suspicions that contracting is a means for companies to reduce labour costs by paying less, passing responsibility for health and safety, pensions and insurance on to contractors, who do not necessarily provide adequate cover and benefits. SAFCOL Eastern Cape now contracts out about 50 % of silvicultural and harvesting operations, a level that is considered by the company to be stable.

Unionisation Unions are free to represent forestry workers but require a certain proportion of workers as members to acquire rights to represent them in negotiation. There is currently one union, SAAPAWU, representing the vast majority of forestry employees in the SAFCOL Eastern Cape region.


## **Environmental aspects**

There are several major environmental issues concerning plantation forestry in South Africa.

### ***Water quality and quantity***

In 1996 the industrial forests in South Africa were estimated to consume about 3 - 400 million cubic metres of water that would otherwise have entered rivers and streams, and been available for other uses. This volume equated to about 15% of the amount used for urban and industrial purposes, or about 5% of the volume used in irrigated agriculture.

The value of wood produced per cubic metre of water consumed is higher than that yielded by many forms of agriculture. However,

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plantation forestry is only practised generally in the wetter areas, such that over 50% of the plantation area is situated where rainfall > 800 mm per annum. The water consumed is a cost required to support the forestry sector. Forestry competes with both agriculture and domestic water use further down stream.

At the macro landscape level, new planting is restricted or banned in particular catchments where river systems supply conurbations or important agricultural areas. New planting can only take place if granted a permit and all planting permits are subject to a full Environmental Impact Assessment and the approval of the Ministry of Water Affairs and Forestry.


The aim of the permit system for afforestation is to disperse afforestation amongst catchments, rather than to limit afforestation generally; permits are administered at the level of quaternary catchments. The intention is that the increased water use anticipated from a proposed forestry development should be assessed in relation to all demands for water downstream of the development. The decision is based on the most favourable use of the water in economic terms after the provision of community needs; the needs of downstream countries on international rivers; and the requirement to maintain aquatic ecosystems.

On a smaller scale, riparian zones and drainage lines must be kept free of all trees. This encourages run off and increased stream flow. The tradition has been, however, for plantations to be planted right up to and over drainage lines. This practice has been stopped by law, but there are still those active in forestry that are not aware of the restraints connected with planting. Guidelines on riparian buffer zone widths are given in the “Guidelines for Environmental Conservation Management in Commercial Forests in South Africa”, which also refers to “the Bosch Model”, a system to determine widths of buffer zones mainly based on stream order and slope.

### ***Wattle as a weed problem***

Black wattle (*Acacia mearnsii*) and silver wattle (*Acacia dealbata*) were introduced to South Africa from Australia at a time there was a major international market for tannin manufactured from bark. However with the fall in the world price of tannin, numerous plantations have been abandoned and left unmanaged. Wattle is an effective competitor with local flora, its seed is readily dispersed and can remain dormant for many years.

Unmanaged wattle has now spread to many areas; particularly drainage lines where it kills indigenous vegetation; increases erosion on slopes and decreases water supplies. It is one of South Africa’s most important weed problems. Where it regenerates in an uncontrolled fashion it quickly becomes an impenetrable thicket which

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is difficult to eradicate. Wattle coppices when cut. Seed dormancy is broken by fire which is one of the main management tools for open grassland areas; hence fire stimulates a fresh flush of seedling growth rather than controlling the problem.

### ***Plantation forestry and biodiversity***


In South Africa, an essentially dry country, there is a limited indigenous forest resource (largely managed by DWAF and the provincial Parks Boards). Practically all plantations have been established on grassland. Initially it was assumed that grassland was low in terms of biodiversity. It is now being seen as an important element of the local ecology and one that warrants management even within a forest plantation setting.

About 11% of the mountain grasslands and higher-lying parts of South Africa are afforested, resulting in fundamental habitat changes that impact on biodiversity. Although forestry displaces many of the original species, it does provide habitats for new species suited to arboreal habitats. Nevertheless, biodiversity in plantations is lower than that found in the climax vegetation, except when compared with many agricultural monocultures, and degraded land.

New laws have been implemented to prevent plantations being established up to the edge of drainage channels. The aim is to encourage the re-establishment of natural vegetation types in riparian buffer zones. In well managed plantations where such buffer zones do exist, biodiversity is maintained. To restore vlei (wetland) areas that have been planted up in the past, many of these areas are now being cleared of trees and allowed to return to grassland. They are then actively managed under a strict fire regime, since the natural grasslands in South Africa are fire climax vegetation types.

Other important types of natural vegetation in the region are the fynbos vegetation (a low, sclerophyllous, shrubby type of vegetation) and indigenous evergreen high forest. These establish themselves in areas that are either protected from fire, or situated in a humid environment. These pockets or corridors of indigenous vegetation are protected by law and therefore need to be respected in day-to-day management.

The Parks Board, which is responsible for management of conservation areas, has to be economically self supporting by the end of the year 2006 and is developing a tourist industry around these conservation areas. Although only 1.5% of the areas may be used for the required infrastructure and buildings [roads, lodges, restaurants, huts, etc.], the pressure on some of the conservation areas, and thus on their biodiversity, is likely to increase significantly. In the meantime the Parks Board is heavily dependent on the large plantation companies for the management and maintenance of the

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areas. Some of the areas are completely enclosed by plantation compartments. The fire risk is the main incentive for the plantation companies to keep the areas managed.

Although plantation forestry and its impact on biodiversity is being debated intensely in South Africa, there are concerns that alternative stewardship over environmentally sensitive areas will not necessarily mean an improvement to their conservation status.

### ***Landscaping***

Landscape planning is a relatively new concept in South African forestry. The FESA Code of Practice and Guidelines for Environmental Conservation Management mention the issue and indicate acceptable practice.

### **Regulations**

Plantation activities in South Africa are controlled by State Legislation and controlling bodies. The main Acts of relevance are:

- The Forest Act (Law 122, 1984),
- The Occupational Health and Safety Act (Law 85, 1993)
- The Labour Relations Act (1996)
- The Restitution of Land Rights Act (22 of 1994)
- The Land Reform (Labour Tenants) Act (1996)

South Africa is a signatory to the Convention on Biological Diversity, however, it has not come into force in the country yet. Other international agreements (CITES, ITTA and ILO), where relevant, are addressed in existing South African legislation.

The negative environmental impacts of plantations have caused the industry to have a poor public image and to be potentially subject to new legislation. Several sector associations have reacted by producing guides for their members including:


South African Harvesting Code of Practice ( Forest Engineering Working Group of South Africa, 1995);

Guidelines for Environmental Conservation Management in Commercial Forests in South Africa (Forestry Industry Environmental Committee, 1995);

Wattle Control (South African Wattle Growers' Union & Directorate Resource Conservation 1993).

Several Acts of significance for forestry are yet to be promulgated including:

- Health Act

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- Environment Conservation Act
- Water Act
- Conservation of Agricultural Resources Act
- Forest Act
- Lands and Tenure Bill

## **THE ASSESSMENT**

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### **Schedule**

The Assessment was preceded by a pre-assessment by SGS Forestry during 1996. This examined the forest management systems in Eastern Cape Region and identified any gaps that might preclude certification. Information gathered was used to plan the main assessment. Key stakeholders were identified.

The main assessment was carried out during the period 16 - 20 March, 1998. An itinerary is shown in Appendix I of the full report.

### **Team and peer reviewers**

- Lead Assessor: Neil Judd, SGS Forestry
- Forest Management Assessor: Fabrice Lantheaume, SGS Forestry
- Local Social Specialist: Saths Moodley, SEDIBA South Africa
- Local Environmental Specialist: David Scott, CSIR Division of Water, Environment and Forestry Technology

Curricula vitae are provided in Appendix II of the full report.

Three independent specialists have been selected to review this report. They include one from academia, one forest industry environmental specialist and one from a socio-economic background.

### **Process**


The Main Assessment was conducted in the steps outlined below.

#### ***Preparation***

Using the results from the pre-assessment and the locally applicable documents noted below, a checklist was prepared from the generic QUALIFOR checklist.

#### ***Local standards***

Since no draft national FSC standard was available, the QUALIFOR assessment checklist was modified for the specific local conditions based on requirements of the following:

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South African Harvesting Code of Practice ( Forest Engineering Working Group of South Africa, 1995) [also referred to hereafter as FESA COP];

Guidelines for Environmental Conservation Management in Commercial Forests in South Africa (Forestry Industry Environmental Committee, 1995) [also referred to hereafter as GEC];


Workshop on Criteria and Indicators for Sustainable Management of Plantations (Department of Water Affairs and Forestry, March 1997).

The resulting checklist was available six weeks before the assessment for comment and was sent to any organisation which requested a copy following receipt of the stakeholder consultation letter.

### ***Stakeholder consultation***

A wide range of stakeholders were contacted four weeks before the field visit to inform them of the planned assessment and ask for their views on relevant forest management issues. These included:

| ORGANISATION                             | TYPE OF COMMUNICATION |
|--|-----------------------|
| SAAPAWU (Keurboomsrivier)                | meeting               |
| SAAPAWU (Witelsbos)                      | meeting               |
| SAAPAWU (Blueliliesbush)                 | meeting               |
| SAAPAWU (Longmore)                       | meeting               |
| SAAPAWU (regional)                       | meeting               |
| Humansdorp Local Council                 | meeting               |
| Plettenbergbay Local Council             | meeting               |
| Stutterheim Local Council                | meeting               |
| Hogsback Local Council                   | meeting               |
| Western District Council                 | meeting               |
| Tsitsikamma Community Forum              | meeting               |
| Stormsrivier Ratepayers Association      | meeting               |
| Friends of Hogsback                      | meeting               |
| Lentz Forest Products (Pty) Ltd          | fax                   |
| Pollution Control Technologies           | fax                   |
| Department of Water Affairs and Forestry | fax                   |
| Tyrrell Associates                       | fax                   |
| Stutterheim Development Foundation       | fax/telephone         |
| East London Museum                       | fax                   |
| The Croft Enterprises                    | fax                   |
| Wildlife and Environment Society of SA   | fax                   |
| Afforestation Review Panel               | fax                   |
| Agricultural Computer Services           | fax                   |
| Albany Museum                            | fax                   |
| ARDRI Univ Ft Hare                       | fax                   |
| B&K                                      | fax                   |
| Cape Nature Conservation                 | fax                   |
| Coastal & Resource Management            | fax                   |
| Corplan                                  | fax                   |
| Crab-Bush School                         | fax                   |
| Dept Economic Aff, Env & Tourism         | fax                   |

|   |                                      |                            |
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|                                     |     |
|-------------------------------------|-----|
| DWAF - Forestry                     | fax |
| Dohne Merino Breeders Ass           | fax |
| Dohne Research Station              | fax |
| Earth Life Africa                   | fax |
| East London Museum                  | fax |
| Eastern Province Agricultural Union | fax |
| Agricultural Extension Officer      | fax |
| Farmer's Union                      | fax |
| Hogsback Chamber of Commerce        | fax |
| Hogsback Civil Protection           | fax |
| Hogsback Local Council              | fax |
| Hogsback Rate Payers                | fax |
| Plaatjieskraal School               | fax |
| Outward Bound                       | fax |
| Rance Timber                        | fax |
| Rhodes University                   | fax |
| Rural Support Services              | fax |
| SA National Parks                   | fax |
| Stutt Poles                         | fax |
| WWF                                 | fax |

Meetings or telephone discussions were held with stakeholders as determined by the responses to notification letters and follow-up calls. These aimed to collect further information on any issues raised which were then included as part of the assessment.

#### ***Document review***


A review of the main forest management documentation was conducted to evaluate the adequacy of coverage of the QUALIFOR Programme requirements. This involved examination of policies, management plans, systems, procedures, instructions and controls. The document review was carried out at SGS Forestry's offices prior to the Main Assessment.

#### ***Field assessments***

Field assessments aimed to determine how closely activities in the field complied with documented management systems and QUALIFOR Programme requirements. Interviews with staff, operators and contractors were conducted to determine their familiarity with and their application of policies, procedures and practices that are relevant to their activities.

#### ***Sampling***

Selection of sites for field visits consisted of two levels of random sampling. Firstly, two of the three Districts within SAFCOL Eastern Cape were randomly selected. Secondly, three of the five plantations within these two Districts were randomly selected. (In the event of the random sample generating three plantations within the same District, the final selection would have been rejected until one plantation from the second District had been selected).

|   |                                      |   |
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Field inspections were carried out at a selection of sites within each plantation, to evaluate whether practices met the required performance levels. Sites in each plantation were selected following consideration of APOs and maps, with the objective of inspecting a range of recent and current operations. Field sites visited during the assessment were as follows:

| Location  | Operation               | Status    |
|---|-------------------------|-----------|
| <b>LOTTERING PLANTATION<br/>(TSITSIKAMMA DISTRICT)</b>          |                         |           |
| Compartment A67   | Clearance of vlei area  | On-going  |
| Compartment A44   | Planting                | Completed |
| Compartment A19   | Riparian zone clearance | Completed |
| Compartment A7/8/10/12  | Harvesting/planting     | Completed |
| Compartment A20   | Planting                | On-going  |
| Compartment D66   | Harvesting              | Completed |
| <b>BLUELILIESBUSH<br/>PLANTATION<br/>(TSITSIKAMMA DISTRICT)</b> |                         |           |
| Compartment E14a  | Riparian zone clearance | Completed |
| Compartment D53   | Riparian zone clearance | Completed |
| Compartment E35/72  | Harvesting              | On-going  |
| Compartment E46a/b  | Harvesting              | On-going  |
| Compartment C24   | Planting                | Completed |
| <b>HOGSBACK PLANTATION<br/>(AMATOLA DISTRICT)</b>               |                         |           |
| Compartment B6a/b   | Harvesting              | Completed |
| Compartment E16/18  | Harvesting              | On-going  |
| Compartment D21a  | Planting                | Completed |

### ***Summing up and closing meeting***

At the conclusion of the field assessment, findings were presented to the organisation's management at a closing meeting. Any areas of non-conformance with the QUALIFOR Programme were raised as one of two types of Corrective Action Request (CAR):

- **Major CARs** - which must be addressed and re-assessed before certification can proceed

|   |                                      |  |
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|   | <b>Forest Area:</b>                  | <span style="float: right;"><b>Eastern Cape Region</b></span>    |

- **Minor CARs** - which do not preclude certification, but must be addressed within an agreed time frame, and will be checked at the first surveillance visit

## **ASSESSMENT RESULTS**

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Detailed assessment findings for each of the QUALIFOR Programme requirements, including any observations and corrective actions raised, are included in the full report. The main results are summarised below.

### **Summary of findings**

#### ***Legal framework***

The South African constitution includes a equality clause, prohibiting racial discrimination. An audit of salaries within grades containing employees with a variety of racial backgrounds revealed insufficient clarity in the criteria utilised for setting salaries. Differential salaries are being paid to staff on the same grade, with similar lengths of service and qualification. In order to preclude any possibility of racial discrimination, clearer guidelines must be defined.

The Human Resource Manager subscribes to a legislative update service to ensure that he is up to date with actual and forthcoming requirements relating to employees, tenants, and health & safety. No evidence of non-compliance with the main Acts of relevance, such as the Labour Relations Act and the Occupational Health and Safety Act, was observed.


There appear to be adequate systems to ensure that legislative requirements are communicated throughout the organisation, including a 'Code of Conduct' for contractors.

#### ***Forest Management System***

Separate planning documents exist at different planning levels. The two main activities are the 30-year strategic Working Plan for each plantation, and an Annual Plan of Operations (APO), also for each plantation. There is a publicly available document, summarising the primary elements of management planning.

The latest GIS infrastructure is now in place; complete map production facilities are available, and a range of spatial data layers are becoming available at the plantation level.

SAFCOL have an excellent stock management system (COMPAS), based on periodic growth and yield measurements. Silvicultural practice is based on sound science and technique, and defined in the Timber Growing Policy.

|   |                                      |   |
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There is no specific guideline for the implementation of the relevant aspects of the FESA COP, and foresters were generally not utilising the GIS tools available to them. A number of incidences of non-compliance were observed in terms of the implementation of the FESA requirements, including inadequate harvest planning, examples of felling into vleis areas, poor planning of extraction routes, and inadequate rehabilitation of skid paths. Post-harvest auditing is carried out, although the thoroughness is variable and the actual value in the field is currently doubtful, due to limitations of the audit forms and the fact that the checks are carried out by personnel too closely involved in the actual operations.

Although road maintenance was found to be included for budgeting purposes in the plantation APO, formal road maintenance plans are not maintained and implemented. Roads throughout the region were frequently inadequately drained, and are a continuing source of erosion and sedimentation.


There is a programme for systematic rehabilitation and management of indigenous forest and riparian zones, for example through weeding or burning prescriptions. The vegetation mapping project will also enable the implementation of a holistic approach to plantation layout, based upon an integrated approach to the management of unplanted areas.

### ***Social Elements***

A serious lack of systematic and on-going liaison with local communities was identified. There are no formal structures and mechanisms for ongoing liaison between SAFCOL and neighbouring communities in most areas. SAFCOL Eastern Cape's neighbours include other forestry companies, private commercial farmers and poor rural communities. Relationships between staff and the former categories are generally good, whilst there is no such history of trust between SAFCOL and poor rural communities. The alienation of neighbours has even extended to community groups with which SAFCOL has previously had good relationships, in some areas.

SAFCOL Eastern Cape contracts out approximately 50 % of silvicultural and harvesting work, a level that is now considered stable. There was evidence that contractors, or sub-contractors, from previously disadvantaged communities, are being utilised in significant numbers. However, there are insufficient formal controls in place to ensure that people in local communities have equal or preferential opportunities in employment and contracting.

There has been little or no involvement by local stakeholders in the decision-making processes regarding the allocation of Corporate Social Investment funds. There is, however, a highly commendable

|   |                                      |                               |
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environmental education and awareness initiative being implemented across the region.

SAFCOL provides their employees with family accommodation in workers villages. There is a current trend towards enabling workers and other local residents to relocate to central villages where they will be able to own houses and have access to public services; to this end, a number of potential sites identified, and SAFCOL will make land available for the villages. There was a general lack of understanding amongst employees regarding their rights under the company's Housing Policy.

SAFCOL have a progressive Affirmative Action Policy, although there is limited evidence so far of implementation.

The Human Resources Manager at Regional Office is responsible for liaison with unions. There is considerable Union representation in all Districts: the SAAPAWU union represents most of the workforce. The union has made wage agreements in all Districts.

### ***Optimising Benefits from the Forest***

The Regional Financial Manager maintains records of costs and assessments of future economic viability. The current annual operating profit is around 5 Million Rand after tax.

SAFCOL recognises the full range of forest services, as evidenced by its environmental policy and the contents of the conservation management plans. There is demonstrable awareness of other products and services from forested lands, including water, wildlife, and potential for inter-cropping.


There are two major projects for utilisation of the land for non-timber forest products (NTFPs), comprising the cultivation of *Protea* and ferns. Hiking trails through plantations are promoted as a resource for visitors and tourists.

Local contracting enterprises are increasing in number, associated with all aspects of forest management.

### ***Environmental Impact***

The Environmental Policy statement for SAFCOL specifies compliance with the FSC P&C. The public management planning summary includes a commitment to compliance with the FESA Harvesting Code of Practice.

All unplanted vegetation areas are currently in the process of being identified and mapped. In addition, comprehensive site-specific Conservation Management Plans have been produced for most plantations, and an Areas of Special Interest Register is also being compiled for each plantation as the mapping proceeds.

|   |                                      |                            |
|---|--------------------------------------|----------------------------|
|  <b>SGS Forestry</b> | <b>MAIN ASSESSMENT REPORT<br/>19</b> |                            |
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Many examples of serious weed problems in riparian zones and indigenous forest areas were observed. However, remedial work has commenced in all plantations, according to formal plans with management prescriptions.

Currently there are inadequate riparian buffers, resulting from past management practices. Considerable efforts are being directed at improving this situation, although the Bosch model requirements of the GEC are currently being applied inconsistently and conservatively. The SAFCOL Cape regions have unilaterally adopted their own riparian zone prescription which does not comply with nationally accepted standards.

Each plantation maintains a list of species of special interest. SAFCOL Eastern Cape have four sites under their ownership and/or management that have been accepted by the relevant authority as Natural Heritage Sites, designated for features of national importance. These are managed accordingly.

Biennial environmental audits are conducted at each plantation, against a common SAFCOL checklist. Evidence was noted of a feedback and corrective action mechanism working well.


In relation to long-term environmental monitoring, SAFCOL has instigated soil compaction trials with regard to the mechanised harvesting system, and some monitoring of key species at Natural Heritage Sites is being commissioned. However, there is a lack of rationale to take due account of the primary local issues, such as water yield and quality, and the relative importance thereof. Monitoring is required to provide feedback on the efficacy of the various measures that the company is taking to reduce its impact in these areas.

SAFCOL must ensure that impacts of weed escapes into surrounding natural vegetation is taken account of when land is transferred to public agencies. Such agencies may be ill-equipped to cope with serious weed problems.

### Issues raised by stakeholders

The following points were raised by stakeholders during the consultation process:

| Issue   | Finding   |
|---|---|
| A. Lack of consultation with key stakeholders, such as local authorities. Lack of clear contact points for liaison with stakeholders. Little involvement of stakeholders in identification of projects for Corporate Social Investment. | Corrective Action Requests (CARs) 01, 02 and 03 raised. |

|   |                                      |   |
|---|--------------------------------------|---|
|  <b>SGS Forestry</b> | <b>MAIN ASSESSMENT REPORT<br/>20</b> |   |
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|  |   |
|--|---|
| B. Discrimination in salaries and limited prospects for promotion for black employees. This perspective is reinforced by some negative management attitudes.         | Differential salaries are being paid to staff on the same grade, with similar lengths of service and qualification. In order to preclude any possibility of racial discrimination, clearer guidelines must be defined. CAR 09 raised.                   |
| C. Community representatives unaware of procedures for promoting opportunities in employment and contracting, particularly to previously disadvantaged communities.  | Insufficient controls are in place to ensure that people in local communities have equal or preferential opportunities in employment and contracting. CAR 08 raised.  |
| D. Employees have to work in inclement weather conditions, sometimes resulting in accidents.   | SAFCOL have a Rainy Day policy, detailing the procedure for wet-weather working. Accident books are maintained satisfactorily. No evidence of unacceptable practices was found.   |
| E. Access to plantation areas for recreation/hiking reduced without consultation. Problems with damage to water easements for neighbouring communities not resolved. | CARs 01 and 02 raised.  |
| F. Unacceptable environmental practices in terms of planting through wetlands and watercourses.  | Field observation determined that past practices are being rectified, and considerable improvements made in accordance with planned work programmes. However, many riparian zones are still inadequate according to national guidelines. CAR 13 raised. |
| G. Environmental impacts of alien invaders on native vegetation and water resources.   | Observation raised in main report, such that SAFCOL must ensure land transfers to conservation agencies take account of capabilities for on-going control of aliens.  |
| H. Employees unaware of provisions in SAFCOL Housing Policy.   | Observation raised in main report, such that SAFCOL must ensure employees are aware of their housing rights.  |

## **STRENGTHS AND WEAKNESSES**

### **Strengths**

The company demonstrates a strong technical approach to several aspects of forest management. In particular:

- A silvicultural system based on sound science and technique, and involving a complex sequence of tending, pruning and thinning: well thought through to produce the saw-timber crop that is being aimed at.
- SAFCOL have a stock management system (COMPAS) that is well integrated with the management planning process. Good records are kept

|   |                                      |                               |
|---|--------------------------------------|-------------------------------|
|  <b>SGS Forestry</b> | <b>MAIN ASSESSMENT REPORT<br/>21</b> |                               |
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of yields and growth based on periodic measurement of stock. Planning of harvesting is generally based on a sound knowledge of the size, age, type, and growth rate of stands and scientific yield models matched to site and species. The working plans for each plantation are updated by the regional office every year, based on harvests, measured yields and silvicultural activities in the previous year. The annual plan of operations (APO) is derived from the Working Plan.

- SAFCOL has a good GIS infrastructure (ArcInfo) in place in Head Office in Pretoria. Complete map production facilities with the latest GIS technology are available in the regional office and will soon be available on the plantations. Spatial data layers with imbedded annotation are or will be available for cadastral and plantation boundaries, topography, soils, erosion hazard, stands (compartment boundaries), conservation areas, riparian reserves, sites of special interest and terrain classification and limitations. This provides an excellent tool for planning of operations.
- Comprehensive Conservation Management Plans for plantations have been produced, being site specific and giving proper descriptive foundations and setting out the objectives for conservation planning. In addition, the environmental files at each plantation were an effective innovation that helped organise and focus these aspects of the management at plantations, although this system could detract from the future integration of management.
- The environmental education and awareness initiative (Khula nam) being implemented by the Wilderness Leadership School with sponsorship and support from SAFCOL is highly commendable.

### Weaknesses

13 Minor Corrective Action Requests (CARs) were raised during the Main Assessment. In addition, 2 further Minor CARs (nos. 14 and 15) have been raised in response to comments by peer reviewers. CARs are described in the following table, where the requirement number refers to the indicator used in the QUALIFOR Programme checklist.


| CAR No | QUALIFOR requirement        | Description  |
|--------|-----------------------------|--|
| 1.     | 3.1.3/4.5.1                 | There is no documented resolution procedure concerning disputes or grievances with local stakeholders.   |
| 2.     | 4.1.1/4.4.1/4.4.2/<br>4.4.6 | Responsibility for liaison with local stakeholders is not defined. Comprehensive lists of stakeholders are not maintained for each plantation, and ongoing consultations are not carried out.    |
| 3.     | 4.1.6                       | Local communities do not have an adequate role in the identification of projects for Corporate Social Investment.  |
| 4      | 6.5.1.2/6.5.1.5/<br>6.5.1.6 | Road drainage:<br>(1) Formal road drainage plans are not defined; (2) Road maintenance specifications are not adequately defined; (3) Examples of inadequate road drainage were observed; (4) An |

|   |                                      |   |
|---|--------------------------------------|---|
|  <b>SGS Forestry</b> | <b>MAIN ASSESSMENT REPORT<br/>22</b> |   |
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| CAR No | QUALIFOR requirement | Description  |
|--------|----------------------|--|
|        |                      | example of water draining directly from a road into a watercourse was observed.  |
| 5.     | 6.5.1.9/6.5.1.10     | Compartment harvesting plans are not adequate. For example, they do not utilise available site details such as topography and soil mapping.  |
| 6.     | 6.5.1.12             | Examples were observed of trees being felled into vlei areas, with associated damage from skidders.  |
| 7.     | 6.5.1.13             | Skid trails are not adequately rehabilitated after use.  |
| 8.     | 4.1.3                | Insufficient controls are in place to ensure that people in local communities have equal or preferential opportunities in employment and contracting.  |
| 9.     | 1.1                  | Differential salaries being paid to staff on the same grade, with similar lengths of service and qualification.  |
| 10.    | 6.6.6                | There are inadequate emergency procedures for chemical spillages and/or accidents. Procedures must be available at relevant points of use.   |
| 11.    | 8.1.1/8.2.4/8.5.1    | There is no rationale and/or procedures for monitoring activities at the plantation level. Water quality, water quantity and species of special interest must be included. A regular summary of monitoring results must be included in a publicly available document.                |
| 12.    | 10.5.1.1             | Conservation management plans are deficient in critical ecological aspects: (1) Identification of ecological gradients, and hence design of corridors; (2) Season of burn, where burns are prescribed.<br>Conservation management plans have not been completed for all plantations. |
| 13.    | 10.2.4.1             | Delineation and clearing of riparian zones is generally inadequate, and buffers are overly narrow on important rivers.   |
| 14.    | 6.5.2                | Post-harvest audits do not adequately monitor the environmental impacts of operations.   |
| 15.    | 10.8.2               | There are inadequate mechanisms to monitor off-site effects of plantations, with particular regard to the spread of invasive tree weed species.  |

## **CERTIFICATION RECOMMENDATION**

The outstanding Minor Corrective Action Requests do not preclude certification, but SAFCOL Eastern Cape is required to take the agreed actions before the first surveillance visit is carried out. This will be carried out about 6 months from the date of the issuance of the certificate. If satisfactory actions have been take the CARs will 'closed out'; otherwise Minor CARs will be raised to Major CARs.

|   |                                      |                               |
|---|--------------------------------------|-------------------------------|
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SAFCOL Eastern Cape are therefore recommended for certification.

|                            |                                    |
|----------------------------|------------------------------------|
| <b>Prepared:</b> Neil Judd | <b>Checked:</b> Fabrice Lantheaume |
| <b>Name:</b> Neil Judd     | <b>Name:</b> Fabrice Lantheaume    |
| <b>Date:</b> 22 May 1998   | <b>Date:</b> 22 May 1998           |