

Forest Certification Surveillance Report

2nd, surveillance

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Att. Faron Knott 709-637-3155

for the following certified forest area(s):¹

Forests management districts no. 5, 6, 9, 14, 15 and 16 in Newfoundland

File number: 011643-09

Date of surveillance evaluation: (08/18/2014)

Date of finalized report: (11/20/2014)

FSC[®] Registration Code: QM-FM/CoC-001506

Date of Certificate Issue: July 5, 2012

Validity of the certificate: From (05/07/2012) to (04/07/2017)

¹ In the case of group certification, the certificate holder is the group manager and the region in which the group is located must be specified.

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1.0 DESCRIPTION OF EVALUATION

Evaluation dates:	August 18 – 23, 2014
Task	Person days (excluding travel)
Pre-evaluation	0
Preparatory Work+ report	6
Documents, Records and Fieldwork	7
Stakeholder Interviews	2
TOTAL	11

EVALUATION TEAM
Lead auditor: Sylvain Frappier
<p>Senior Forestry Manager Engineer with 29 years of experience in project management of public, private and urban forestry. Preparation of budget forecasts and management of logging operations budget. Proven capacity in managing capital forestry assets (purchase, sale, rental of lands). Annual negotiations of several timber procurement contracts. Supervised forestry operations on public and private lands in Quebec, Vermont and New York. Developed a strategy to access timber supply sources from Russia to support a pole export market in Asia and the Middle East.</p> <p>Negotiated with various groups of interested parties (Ministry of Natural Resources, Environmental groups, Aboriginal communities, Wildlife sanctuary managers,). Auditor for ISO 9001, OHSAS 18001, lead auditor for International forestry management standards such as SFI (Sustainable Forestry Initiatives). CSA Z809, CSA Z804 and FSC (Forestry Stewardship Council) as well as for Chain of custody for, PEFC ST, SFI and FSC.</p> <p>Sylvain is currently the technical manager for the forestry sector for QMI-SAI Global Member of the Ordre des ingénieurs forestiers du Québec.</p>
Auditor: Daniel Martin
<p>Forest engineer with a more than 14 years of experience in the forest industry as a supervisor and manager, specifically in silviculture, harvesting and fiber procurement for sawmills in New Brunswick and Nova Scotia. This has allowed for development of skills ranging from budgeting, negotiating and human resource management. Furthermore, Daniel has cumulated experience in the management of an engineered wood products facility in the province of Quebec. Daniel has negotiated collective bargaining agreements in both the forest harvesting industry and wood products manufacturing in the provinces of New Brunswick and Quebec. He has also been a lecturer at the Moncton University. Daniel is an ISO 14001 assessor and a FSC FM lead auditor and has conducted field work in the Maritimes, Boreal and Great Lakes/St-Lawrence forest types.</p>

1.1.1 Itinerary

Day 1	Evaluators arrive at the site Kick-off meeting Introduction of the audit team Introduction of CBPPL representatives Field visit preparation Evaluation of indicators for principles 1-2-4-5-6-8
Day 2	Evaluation of indicators for principles (cont.) 3-4-6 Stakeholder interviews Field visits Districts 9-15

Day 3	Stakeholder interviews
Day 4	Evaluation of indicators for principles (cont.) 4-5-6-8-9
Day 5	Auditors complete assigned principles\indicators and prepare for closing meeting Closing meeting

1.1.2 Approach

The evaluation consisted in:

- Document reviews and interviews with management personnel at the Corner Brook office (administration)
- Field visits where meetings were held with field supervisors and operators; for logistical reasons and travel efficiency, a helicopter was used
- Meetings with stakeholders.

1.1.3 Selected FMUs and Rationale

CBPPL had made the list of all activities that were taking place at the time of the audit as well as location of HCVF present in the different FMU's. The sites were selected by the audit team based on the activity type and the location that would allow covering all selected sites in the most efficient way. The table below presents the active sites per district at the time of the audit. On active sites workers performing task were interviewed as well as contractor supervisors and CBPPL staff. The scope of the interviews covered the workers knowledge of the work instructions applicable to their activities, Health and Safety, working conditions and knowledge of FSC.

1.1.4 Sites Visited

Management unit	Location	Activities audited	Indicators assessed
09	Bear Cove	Harvesting - Mechanical	P4-P5-P6-P7-P8
15	Serpentine North	Harvesting - Mechanical	P4-P5-P6-P7-P8
09	Lynx Pond	Road construction	P4-P5-P6-P7-P8
09	Bear Cove	Road construction	P4-P5-P6-P7-P8
15	Camp 184	Road construction	P4-P5-P6-P7-P8
15	Serpentine North	PCT Operations	P4-P5-P6-P7-P8

1.1.5 Stakeholder Consultation

The stakeholder consultation consisted in phone interviews or in person meetings. During this process we also have a chance to discuss with the Public advisory committee that consist of members representing organisations or individuals from all spheres of activities (Social, Environment, Economic)

Interest group of stakeholders contacted	# of stakeholders contacted	# of stakeholders having made comments
Individuals and enterprises	8	None
Observations resulting from stakeholder consultation		
None		
SAI Global investigation		
Not applicable		

Interest group of stakeholders contacted	# of stakeholders contacted	# of stakeholders having made comments
Municipalities	4	None
Observations resulting from stakeholder consultation		
None		
SAI Global investigation		
Not applicable		

Interest group of stakeholders contacted	# of stakeholders contacted	# of stakeholders having made comments
First Nations	4	2
Observations resulting from stakeholder consultation		
The First Nations representatives had the following comments:		
Group 1 expressed the following:		
<ol style="list-style-type: none"> 1. Concerned about the wording in the audit report indicating under P3 that the Aboriginal People on the island of Newfoundland have no special rights to Crown land. (This section of the present report will be reworded). 2. Relationship building is great and working well. 3. Find the company to be open and providing honest feedback. 4. Confirm that there is a process in place to seek input for the planning process. Consider the company relationship as a good partnership. 		
Group 2 expressed the following		
<ol style="list-style-type: none"> 1. Refute the fact that Aboriginal People on the island of Newfoundland have no special rights to Crown land. 2. Consider that the community is not being taken seriously by the company when make request. 3. Have expressed the request of having not cut in the area where the community practices its traditional activities. 4. Expressed the fact that the community was never invited by DNR in the 5 year plan consultation process. 5. Community would like to see forestry work offered to their contractors. 6. Would like for the company to invest money for projects in the community besides their participation in the CBFA process. 		
SAI Global investigation		
<u>Group 1</u>		
Point 1 – SAI Global has reviewed this section of the report.		
<u>Group 2</u>		
Point 1 - SAI Global is not in a position to argue on traditional rights after the fact that a court ruling was issued. <i>Newfoundland and Labrador - Heard: January 23 - February 6, 2006 / Judgment: October 11, 2006</i> . Notwithstanding the current application of P3 in the present context in Newfoundland, it is		

understood that the possibility of future interpretations of Aboriginal rights may require CBPPL to review its approach accordingly. Any new interpretations/Court ruling will be integrated in the FSC process by CBPPL and SAI Global will ensure that CBPPL is in compliance with any changes any new application of the law may bring.

Point 2 - 6 – SAI Global has issued a minor NC to have the concerns discussed

Interest group of stakeholders contacted	# of stakeholders contacted	# of stakeholders having made comments
Contractors	2	None
Observations resulting from stakeholder consultation		
None		
SAI Global investigation		
Not applicable		

Interest group of stakeholders contacted	# of stakeholders contacted	# of stakeholders having made comments
Non-governmental organizations (NGOs)	15	2
Observations resulting from stakeholder consultation		
The Non-governmental organizations (NGOs) representatives had the following comments:		
Group 1 responded:		
Very few interactions with CBPPL, mainly around data sharing which was satisfactory.		
Group 2 responded:		
<ol style="list-style-type: none"> Expressed concerns about CBPPL suspending its participation (January 2014 in the Canadian Boreal Forest Agreement (CBFA) and that no long term assurances is in place to ensure that CBPPL would continue to work with NGOs signatories to the CBFA in Newfoundland should the company decide to suspend their participation within the CBFS . To be noted that CBPPL had agreed to return to the CBFA table in April 2014. The NGO expressed the following recommendation to SAI Global: <i>Require CBPPL to undertake joint protected areas planning and caribou conservation planning with CPAWS and the other ENGO participants of the CBFA process in Newfoundland, should the company suspend its participation in the CBFA agreement in the future.</i> Wanted to know why CBPPL did not want to co-sign a letter with the NGO addressed to the provincial government to indicate their support for the NASP (Natural Areas System Plan). The NGO expressed the following recommendation to SAI Global: <i>CBPPL needs to be more proactive with communicating their support for the NASP and following through on delivering a letter to the provincial government that clearly indicates their interest in seeing these sites officially protected.</i> The area of concern for ENGOs pertains primarily to the Bay d’Espoir unit. This unit is important to conservation because of its importance to woodland caribou, and to the First Nations. The 2011-2016 Forest Management Plan seems to suggest CBPPL plans to harvest some of this LLEV. Original submissions by the NGO, through the Zone 3 Forest Management Planning Process recommended this area be deferred entirely from forest harvesting, but these recommendations were not incorporated. A recent joint report by 2 NGOs that used the NL Forest Resource Inventory (FRI) identified that a substantial component of the Bay d’Espoir LLEV has already been 		

clear-cut, and permeated by resource roads at the time of its original designation, especially the portion east of the highway. Hence a significant portion of this LLEV appears compromised and likely not meeting the ecological values for which it is intended under FSC.

The NGO expressed the following recommendation to SAI Global: *CBPPL update its LLEVs with current FRI and woodland management data, and adjust the proposed boundaries of the Bay d'Espoir LLEV to compensate for the 40% to 50% of the area apparently compromised by previous harvesting activities. Adjust/amend the current 5-Year Forest Management Plan to align with commitments to maintain a LLEV in deferred status in this area.*

4. We consider the PIC report deficient as per our original review, and in need of a qualified third party audit. This could be best achieved by selection of a mutually agreeable third party expert. The original PIC report was not reviewed by a mutually agreeable independent third party. A suggested potential reviewer could be Dr. Kneeshaw at Laval University as he has extensive scientific background in old-growth boreal forests.

SAI Global investigation

Group 1 - No comments

Group 2

Point 1 – SAI Global had a discussion with CBPPL representative about this concern. We understand that CBPPL through Kruger Inc. has signed the CBFA agreement in 2010 and remains committed to it. CBPPL wanted to evaluate the process in light of how it was proceeding both nationally and locally. This was expressed in a letter to the regional working group facilitator and copied to the CBFA executive director. A face to face meeting in April 2014 addressed CBPPL concerns (some of which were shared by the ENGO caucus with the national approach to communication). This meeting was facilitated by the national executive director of the CBFA. All issues were resolved to everyone's satisfaction and it was decided to move forward.

The recommendation put forward by the NGO could also apply to the NGOs signatories to the CBFA process. This would in our opinion be counter-productive and not add value to the process in place. We remain confident in the process in place and that all active members will see this process go through.

No further action required.

Point 2 – SAI Global had a discussion with CBPPL representative about this concern. CBPPL representatives expressed to the auditor that to co-sign a letter to the provincial government regarding support for the NASP would impact on their position when dealing with government in the CBFA process.

The NASP was developed in the 1990's and is being held from becoming a public document (by government) for reasons unknown to CBPPL and the general public. Although the areas proposed for protection are unknown they are protected from all forest management activities. All of CBPPL proposed forest management activities must be outlined during the five year planning process and submitted to government for approval. If a proposed area falls inside a proposed NASP area the activity is not approved, therefore protected from harvesting.

The CBFA process will provide recommendation to government for a protected areas network. Some of the recommended areas may include NASP areas. CBPPL was not prepared to pressure government into accepting or implementing those recommendations. According to CBPPL this was a point made to the ENGO caucus during the first face to face meeting. The

Executive director of the CBFA would have explained that industries across the country were taking the same position with regard to this approach when dealing with governments.

SAI Global is the opinion that initiating activities outside the current CBFA process would not be productive as such. The current process is the forum by which all parties having interest in the provincial protected areas can be driven. No further action required.

Point 3 - SAI Global has requested from CBPPL to provide evidence of its commitment to maintain the deferral area of the Bay d'Espoir unit which was the main unit that was of concern for the NGO. We also wanted to have the full picture of the areas that may have been harvested as indicated in the letter from the NGO where up to 40% to 50% of the area was apparently compromised by previous harvesting activities.

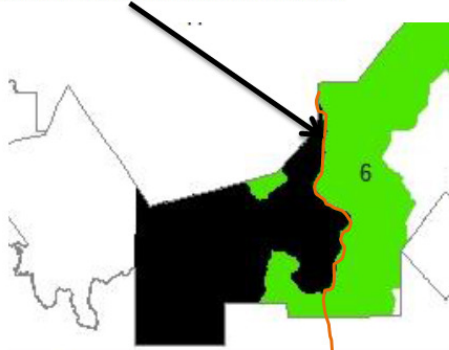
SAI Global has obtained a chain of emails (August 11 and 14, 2014) where the NGO is inquiring about the commitment to maintain the deferral areas. The response made by CBPPL representative is as follow: *"With regard to our deferrals, we agree to leave these in place while the CBFA process is taking place. We need to look at the boundaries of the deferral located at the bottom of forest Management district 06 to accommodate Aboriginal values and concerns in that area. We are committed to this process and feel that once we look at the medium and fine scale proposals, we will be able to generate recommendations to the government."*

We understand that the NGO would prefer to see an adjustment made to the Forest Management Operating Plan but we have no reason to believe that CBPPL would not respect its commitment for the Baie d'Espoir area. No further action required.

As far as the area is being compromised by previous harvesting activities at a level of 40% to 50% we believe that there might be a misunderstanding in the boundaries proposed by CBPPL for the Baie d'Espoir area as suggested by a statement made in the letter from the NGO. *"A recent joint report by CPAWS-NL and NCC that used the NL Forest Resource Inventory (FRI) identified that a substantial component of the Bay d'Espoir LLEV has already been clear-cut, and permeated by resource roads at the time of its original designation, especially the portion east of the highway. Hence a significant portion of this LLEV appears compromised and likely not meeting the ecological values for which it is intended under FSC.*

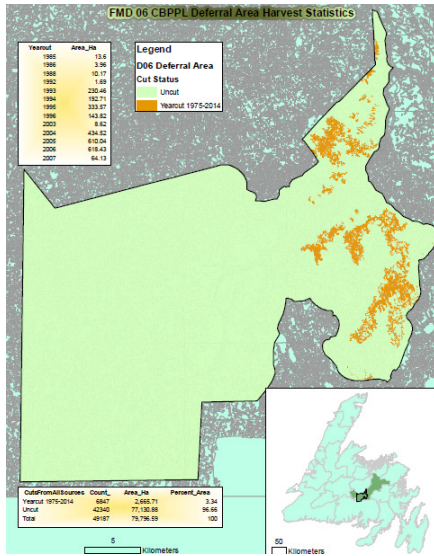
As can be seen in the figure below, the boundary does not extend east of the Bay d'Espoir highway. In fact, the highway is essentially the eastern boundary of the deferral area. The original proposal made by CBPPL for this ~80,000 ha has not changed.

Approximate location of the Bay d'Espoir Highway



We have also reviewed the information for the harvesting operations that could have taken place West the Bay d'Espoir highway. The GIS report (mapped area) plus an analysis for

areas harvested from 1975 to present indicate that 3.36% of the total area West of the highway has been harvested.



At this point we are documenting an opportunity for improvement to CBPPL in order to clarify with the NGO the basis of their evaluation and review the sources of information of the CPAWS-NCC GIS project that was funded by the MEC GIS which results indicated that 40-50% of the CBPPL LLEV in the Zone 3 (Bay d'Espoir) tenure was compromised and would not qualify as intact.

Point 4 – Indicator 6.1.6 requires the pre-industrial condition (PIC) analysis to be subject to a peer review and be available for public review.

The pre-industrial report (Brown and Wells 2011) has been made available for public review (web: 5 August 2011). The report was externally peer reviewed by Dr. William Meades, NRC Canada, Canadian Forest Service (retired), Sault Ste. Marie, ON. Dr. Meades has approximately 20 years' experience with Newfoundland forest/vegetation mapping, worked to develop Newfoundland's Forest site classification manual, and currently is National Coordinator of the Circumboreal Vegetation Mapping Project.

Comments made by Dr. Meades were incorporated in the PIC report. Dr. Meades found the report satisfactory. Here is the comment he made in his letter addressed to Faron Knott dated June 27 2011. *'Overall, the report is very well written and comprehensive in terms of the literature reviewed and experts consulted to respond to the challenge of "backcasting" what the pre-industrial forest and related environment might have been.'*

The report is also available to public review and is posted on the company website.

SAI Global considers that CBPPL is in compliance with the indicator 6.1.6.

No further action is required

Interest group	of stakeholders contacted	# of stakeholders contacted	# of stakeholders having made comments
Associations		20	None
Observations resulting from stakeholder consultation			
None			
SAI Global investigation			
Not applicable			

Interest group of stakeholders contacted	# of stakeholders contacted	# of stakeholders having made comments
Governments	11	4
Observations resulting from stakeholder consultation		
The government representatives had the following comments:		
1. Company responds in a timely manner to request presented by DNR. Acknowledge that CBPPL is taking the application of their EMS seriously on the ground. Company is underutilizing the available AAC.		
2. Satisfied with the operations.		
3. Relationship with CBPPL is good. Company is responsive to DNR's request. In general DNR is satisfied with CBPPL work in the district.		
SAI Global investigation		
Not applicable		

1.1.6 Additional Evaluation Techniques

No other evaluation techniques were used other than field visits and interviews.

1.1.7 Update on any changes to the scope of the certificate

There are no changes in the scope of the evaluation. The scope remains the Forest management activities on forest management districts no. 5, 6, 9, 14 and 16

The update shall include;

a) Changes in the basic quantitative information as collected at the initial audit(Section 1 of main assessment report):
No changes
b) List of chemical pesticides used within the forest area since the last audit, summarized quantitative data on their use (amount and area) and reason for use;
Vision Max, 954L in 2014. Site preparation for the control of herbaceous vegetation in order to realize 2015 program.
c) Number of accidents in forest work (serious / fatal) since the last audit.
No serious accidents since the last audit, only three incidents where employees were placed on restricted duty for a period of time. Two incidents related to strained back muscles and one a bruised arm muscle.

2.0 STANDARD(S)

2.1 Standard Used

For this audit we have used the National Boreal Standard August 6, 2004

You may get a copy of the standard at the following address:
www.fscCanada.org/fmstandards.htm

2.2 Description of Local Adaptation of Generic Standard

Not applicable

3.0 OBSERVATIONS

PRINCIPLE #1: COMPLIANCE WITH LAWS AND FSC PRINCIPLES	
Criterion 1.1 Compliance with national and local laws and administrative requirements.	
The applicant undertakes immediate and specific corrective actions when incidences of non-compliance are identified. It was noted that in 2 instances infraction raised by DNR have not been entered in the CAR/PAR process for investigation and resolution. A major NC was raised on the indictor 1.1.4	
Strength	Weakness
Criterion 1.2 Payment of fees, taxes etc.	
The company has put in place a list of Fees that need to be paid in order to maintain the operation running. Verified evidence of payment of municipal taxes (Levy). Verified evidence of payment of the managed forest land tax.	
Strength	Weakness
Criterion 1.3 Compliance with international agreements	
Managers and forest managers could demonstrate awareness and understanding of the legal and administrative obligations with respect to relevant international agreements.	
Strength	Weakness
Criterion 1.4 Documenting of conflicts with laws.	
Not audited during the S2 audit	
Strength	Weakness
Criterion 1.5 Protection from illegal activities	
A verification item is present in the Environmental incident report to document illegal activities (EMS reference 4.5.2) EMS`SFM handbook Manual 1 Section 15 documents the purpose of this procedure to document and report illegal activities. Incidents would be treated through the Corrective actions process. Review of records indicates 2incidents related to illegal activities. Whistleblower policy in place also to encourage workers to inform proper supervisor of any illegal activities that may take place.	
Strength	Weakness
Whistleblower policy	
Criterion 1.6 Adherence to FSC principles.	
Not audited during the S2 audit	

Strength

Weakness

PRINCIPLE #2 TENURE AND USE RIGHTS AND REPSONSIBILITIES

Criterion 2.1 Evidence of forest use rights.

Not audited during the S2 audit

Strength

Weakness

Criterion 2.2 Local communities with use rights can protect their rights and resources.

Not audited during the S2 audit

Strength

Weakness

Criterion 2.3 Appropriate mechanisms to resolve disputes.

No dispute recorded since the 2013 Surveillance 1 audit. Five year plan consultation process generates comments and request that are documented in a register for each of the FMD. Comments and request from stakeholders or general public are addressed and responded by CBPPL. MOU are agreed and signed with some stakeholders (ex: outfitters)

Strength

Weakness

PRINCIPLE #3 INDIGENOUS PEOPLES' RIGHTS

Notwithstanding the current application of P3 in the present context in Newfoundland, it is understood that the possibility of future interpretations of Aboriginal rights may require CBPPL to review its approach accordingly. Any new interpretations/Court ruling will be integrate4d in the FSC process by CBPPL and SAI Global will ensure that CBPPL is in compliance with any changes any new application of the law may bring.

The following conclusion for the application of P3 in this case of certification for the FMUs in the province of Newfoundland is based on:

CBPPL's lawyer from the firm McInnis Cooper

Supreme Court of Canada, Appeal dismissed May 3 2007

Newfoundland and Labrador - Heard: January 23 - February 6, 2006 / Judgment: October 11, 2006

Information gathered through the court decision review and interviews confirm that the Mi'kmaq have no special Aboriginal rights to hunt, fish, or trap in forested areas.

Aboriginal People knowledge of sustainable forest management will be taken into account in the development of CBPPL's Sustainable Forest Management Plan. This will be achieved through active participation of Aboriginal People on the Public Advisory Committee (PAC) or other direct involvement with the interested communities. It is important, therefore, that the target of representation of the Aboriginal People on the PAC is maintained or through other means of communication.

We conclude that the court ruling makes C3.1 and C3.2 not applicable. C3.1 makes a clear reference to the lands and territories.

The intent of C3.1 defines Land and territories of the indigenous people as:

- 1) Those areas where Aboriginal title still exists, that is where no treaties are in place (such lands may be subject to a formal land claim); and,
- 2) Those areas subject to historical (pre-Confederation and post-Confederation) or modern-day treaties.

Our understanding of C3.1 is to the effect the no land title exists, no treaties are in in place and there is no land claim.

C3.2 relates to the impact that forest management may have on the resources or tenures right. The court ruling is clear about the rights of indigenous tenures rights and resources. QMI SAI Global is not making at this point an interpretation of the Court ruling but only considers it as valid and unbiased information to make its decision.

C3.3 and C3.4 are found to be applicable in the context of the related scope of certification because they are not linked directly to Aboriginal titles/Treaty rights

Criterion 3.1 Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.

NA see introduction under P3 above

Strength

Weakness

Criterion 3.2 Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of Indigenous Peoples.

NA see introduction under P3 above

Strength

Weakness

Criterion 3.3 Sites of special cultural, ecological, economic or religious significance to Indigenous People(s) shall be clearly identified in cooperation with such Peoples, and recognized and protected by forest managers.

Not audited during the S2 audit

Strength

Weakness

Criterion 3.4 Indigenous Peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.

Not audited during the S2 audit

Strength

Weakness

PRINCIPE 4 COMMUNITY RELATIONS AND FOREST WORKERS' RIGHTS

Criterion 4.1 The communities within or adjacent to the forest management area should be given the opportunity for employment, training, and other services.

Since the initial registration 2011CBPPL has provided a variety of high-quality jobs throughout the FMUs, and employs a large number of individuals from all over the Province. In total, CBPPL operations directly employs 540 individuals; 315 at the mill in Corner Brook, 200 in Woodlands, and 25 at Deer Lake Power (2014 budgeted numbers). These positions contribute significantly to the economy within the FMUs. To date, DFA wages have been higher than the provincial average wage.

The company remains an active supporter of events in the communities.

Strength

Weakness

Criterion 4.2 - Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.

Health and safety Policy in place and signed by Woodland manager December 7, 2010. Monitoring for OH&S is done through the number 2 inspection. Annual schedule is divided by quarter. All contractors are visited 3 times a year. All workers are covered by the provincial WHSCC. The collective agreement has provision for extra provincial coverage such as dental plan, life insurance and short term disability.

Strength

Weakness

Criterion 4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labour Organization (ILO).

Current Labor Agreement with Local 60 UNIFOR. Interviews with worker during field audit indicate no evidence of company interference.

Strength

Weakness

Criterion 4.4 Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.

Public consultations are conducted for the five year operating plan. Requests are documented and can be found in the operating plan binder for each operating plan. DNR and CBPPL conduct the consultation jointly for each district (FMU). DNR sends the public invitation and make publicity in local paper. The report issued by DNR following the environmental assessment contains comments/recommendations/concerns issued by government agencies. CBPPL must ensure to document consistently how these issues are being addressed. One first Nation community feels that their concerns cannot be discussed properly at the PAC and that CBPPL is not making sufficient effort to develop a partnership for jobs and helping the community financially. A minor NC was issued to ensure that dialogue and effort for consultation is maintained with this community.

Strength

Weakness

Criterion 4.5 Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.

Not audited during the S2 audit

Strength

Weakness

PRINCIPE 5 BENEFITS FROM THE FOREST

Criterion 5.1 Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.

Not audited during the S2 audit

Strength

Weakness

Criterion 5.2 Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.

Not audited during the S2 audit

Strength

Weakness

Criterion 5.3 - Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.

CBPPL has specific objectives on residual commercial fibre left on cutovers. They are implemented as well as the monitoring and control measures. Damage to residual stand is not significant. Field visit in Serpentine North harvest area. There was no evidence of damage to the residual stand. Harvest is being conducted using skid trails in a way to protect naturally established regeneration.

Strength

Weakness

Criterion 5.4 - Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.

Saw logs are sorted out and delivered to sawmilling operations whenever possible.

Strength

Weakness

Criterion 5.5 Forest management operations shall recognize, maintain, and where appropriate, enhance the value of forest services and resources, such as watersheds and fisheries.

Not audited during the S2 audit

Strength

Weakness

Criterion 5.6 The rate of harvest of forest products shall not exceed levels which can be permanently sustained.

CBPPL is committed to the application of the Forest management strategy in order to respect the AAC estimate and its applicability. The audit found that CBPPL respects the rate of harvest and does not exceed the level that can be permanently sustained.

Strength

Weakness

PRINCIPE 6 ENVIRONMENTAL IMPACT

Criterion 6.1 Environmental impact assessments.

Not audited during the S2 audit

Strength

Weakness

Criterion 6.2 Safeguards must exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas).

When Management activities are approved by Wildlife division, special considerations as outlined in DNR certificate of Managed Lands are adhered to. CBPPL has provided training to all relevant forest workers on the identification of species at risk, appropriate measures are taken when a species at risk or sign of a species at risk (e.g., a nest) is identified during field operations.

Field audit confirmed that workers are aware of the species at risk.

CBPPL is in the process to review the Migratory Bird management strategies, including those migratory birds that are also Species at Risk with the Canadian Wildlife Service of Environment Canada (EC-CWS).

No incident related to illegal hunting, trapping, and fishing have been reported by CBPPL staff since last audit.

Strength

Weakness

Criterion 6.3 Ecological functions and values shall be maintained intact, enhanced or restored.

CBPPL use the spatial modeling software Woodstock and Stanley for long term planning. The system takes into consideration, forest age, intact habitat, species composition, remoteness. Field audit and inspection report demonstrate that planning takes into consideration the vegetation types, soil types etc. CBPPL has an Access Management Plan, where the values of the forest identified by all stakeholders, the impact of forest access roads on these values, and a management strategy to eliminate or minimize any negative impacts are listed. Regeneration is assessed for all areas being harvested and timely regeneration occurs. Wildlife habitat and other resources are taken into account at the planning level and however the group of 3 EMS and harvest area compliance sheets and utilization tally sheet do not well cover the intent of this entire indicator.

CBPPL has designated five areas to be added to the Large Intact Landscape area being proposed by the provincial government: Cat Arm (27,487 ha) in District 16; Hampton Downs (32,550 ha) in District 9; Grand Lake South (1,334 ha) in District 15; Bay D'Espoir (79,796 ha) in District 6; and a block (10,790 ha) in District 14. This represents an addition of 151,957 ha. Harvesting will be prohibited in these areas until the report from the CBFA is produced. Then the strategy will be revised accordingly.

Strength

Weakness

CBPPL is committed not to harvest in the identified deferral areas.

Criterion 6.4 Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.

All of CBPPL proposed forest management activities must be outlined during the five year planning process and submitted to government for approval. If a proposed area falls inside a proposed NASP area the activity is not approved, therefore protected from harvesting. CBPPL is also committed not to harvest in the identified deferral areas.

Strength

Weakness

Criterion 6.5 Written guidelines shall be prepared and implemented to: control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and protect water resources.

Not audited during the S2 audit

Strength

Weakness

Criterion 6.6 Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides.

Not audited during the S2 audit

Strength

Weakness

Criterion 6.7 Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.

Not audited during the S2 audit

Strength

Weakness

Criterion 6.8 Use of biological control agents shall be documented, minimized, monitored and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.

Not audited during the S2 audit

Strength

Weakness

Criterion 6.9 The use of exotic species is carefully controlled and actively monitored to avoid adverse ecological impacts.

Norway spruce, an exotic tree, has been planted on about 1000 ha to date some trees have reached seed-bearing age: the species is not considered invasive. Nevertheless, there may be subtle effects over the long term from planting any tree on an area for which it would not colonise naturally. A survey to determine if this species was colonizing outside the perimeter planted was conducted during the summer of 2014. No Norway spruce seedlings were found outside the perimeter planted. CBPPL will stop planting Norway Spruce. Foresters in NL. (CIF) feels that there will be no impact to the provincial wood supply if CBPPL takes this action. Minutes of EMS management review committee Jan 14 and Feb 12 2013 confirms this.

A list of non-invasive exotic species from the Canadian Botanical Conservation Network "Invasive Plant List" was used to generate a seed mix for CBPPL Forestry Operations. Contractors have been notified of a supplier and will purchase only the seed mix specified. "seed mix "

Strength

Weakness

Criterion 6.10 Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:

- a. Entails a very limited portion of the forest management unit; and**
- b. Does not occur on high conservation value forest areas; (HCVF) and**
- c. Will enable clear, sustainable, additional, secure long-term conservation benefits across the forest management unit.**

Not audited during the S2 audit

Strength

Weakness

PRINCIPE 7 MANAGEMENT PLAN

Criterion 7.1 Content of management plan.

Not audited during the S2 audit

Strength

Weakness

Criterion 7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.

Not audited during the S2 audit

Strength

Weakness

Criterion 7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan.

Not audited during the S2 audit

Strength

Weakness

Criterion 7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.

Not audited during the S2 audit

Strength

Weakness

PRINCIPE 8 MONITORING AND ASSESSMENT

Criterion 8.1 Frequency and intensity of monitoring.

Not audited during the S2 audit

Strength

Weakness

Criterion 8.2 Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:

a) Yield of all forest products harvested. b) Growth rates, regeneration and condition of the forest. c) Composition and observed changes in the flora and fauna. d) Environmental and social impacts of harvesting and other operations. e) Costs, productivity, and efficiency of forest management.

Every year, there is a series of report by licence being processed and transmitted to the DNR reporting all volumes by species and categories of product. Collection of information is done through the past annual operations report, that integrates fire wood, volume exchanges, and transfers to other parties. CBPPL contribute financially to the DNR program for regeneration and growth rate improvement of the database. For the 2-5 years regeneration surveys, CBPPL complete the survey and supply the information to the DNR.

The budget covers all the financial resources needed to support forest management and wood procurement activities needed by the mill.

Strength

Weakness

Criterion 8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."

A load slip issued to the truckers by a computerized system allows tracking the trucks from their origin to the delivery point at the mill (truck scale). The load slip identifies the contract number, the contractor name, the Forest Management District of origin, the permit number and the geographical location of the cut blocks. By law, no deliveries from forest to mill can be made if a load slip is not issued and carried along with the wood load. Also, no receiving of raw material can be made at the mill if the trucker doesn't have a contract number.

Strength

Weakness

Criterion 8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.

Not audited during the S2 audit

Strength

Weakness

Criterion 8.5 While respecting the confidentiality of some information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.

Not audited during the S2 audit

Strength

Weakness

PRINCIPLE 9 HIGH CONSERVATION VALUE FORESTS

Criterion 9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to the scale and intensity of forest management.

Not audited during the S2 audit

Strength

Weakness

Criterion 9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.

Not audited during the S2 audit

Strength

Weakness

Criterion 9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.

Not audited during the S2 audit

Strength

Weakness

Criterion 9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.

Monitoring of HCV management strategies can be done through a number of processes. Superintendents monitor harvesting operations by daily contact with contractors and by checking their progress through on-line operating maps that are updated daily. They also perform on-site monitoring at least weekly. Another process is through the Environmental Management System (EMS) compliance inspections. Contractors monitor their own work through monthly #1 EMS Compliance Inspections. CBPPL conducts a comprehensive #2 EMS Compliance Inspection of harvesting contractor activity 3 times per year, and road building activity 1-2 times per year. CBPPL conducts a final #3 EMS Compliance Inspection or a Final Road Inspection after the operating area activity (harvesting or road building) is completed. A Cutover Assessment Survey is done in conjunction with the #3 inspection to determine utilization rates, amount of soil disturbance, and number of wildlife/snag trees. Any HCVs that are to be monitored through the EMS Compliance Inspections and Cutover Assessment Surveys have been added to the inspection forms and guidelines. The annual EMS and SFM Standards internal and external environmental audits also serve as monitoring processes. To determine the effectiveness of the management strategies, in many cases CBPPL relies on agencies with which it has "agreements" related to the High Conservation Values. Table 7 of the HCVF assessment report lists monitoring strategy for each HCVF has been updated in July 2014.

Strength

Weakness

PRINCIPE10 – PLANTATIONS

Principle 10 does not apply to the operation of CBPPL. None of the forest practices are considered to be plantation according to the FSC definition.

3.1 Observations on review and resolution of complaint

No complaint were received since the initial audit

3.2 Summarized progress in implementing the conditions related to any approved pesticide derogation

Not applicable – No pesticide derogation.

4.0 SURVEILLANCE DECISION

4.1 Non-Compliances

NC #:	2014-01	Type of NC – Major or Minor:	Major
Standard requirement :	Indicator 1.1.4		
Non-compliance:	CBPP did not follow its nonconformity, corrective and preventive action procedure.		
Evidence provided to close the NC	September 19, 2014, Woodlands Manager issued a directive to superintendents, supervisors and contractor supervisors requiring them to document any written or verbal directive from DNR, and to complete an incident report for the directive. On September 12, 2014 an addition was made to the #3 inspection form that any deficiency requires an Environmental Incident Report and is an Automatic Fail.		

NC Status: Closed - November 20, 2014

NC #: 2014-02 **Type of NC – Major or Minor:** Minor
Standard requirement : Indicator 6.5.1
Non-compliance:
CBPP did not follow its Standard Operating Procedure for road construction method and ballast and borrow pit operations.
Evidence provided to close the NC
NC Status: Open

NC #: 2014-03 **Type of NC – Major or Minor:** Minor
Standard requirement : Indicator 4.5.2
Non-compliance:
Employee training on the installation of watercourse crossing is ineffective.
Evidence provided to close the NC
NC Status: Open

NC #: 2014-04 **Type of NC – Major or Minor:** Minor
Standard requirement : Indicator 6.5.2
Non-compliance:
The weekly inspection process was not adequately implemented on the road construction occurring on Camp #184.
Evidence provided to close the NC
NC Status: Open

NC #: 2014-05 **Type of NC – Major or Minor:** Minor
Standard requirement : Indicator 6.5.1
Non-compliance:
Stream crossings on Camp 184 road were not installed according to the standard operating procedure Woodlands R-02 Steel culvert and pipe arch installation
Evidence provided to close the NC
NC Status: Open

NC #: 2014-06 **Type of NC – Major or Minor:** Minor
Standard requirement : Indicator 4.4.3
Non-compliance:
Even though efforts were made to contact and involved the Miawpukek communities in forest management in the area under certification the concerns raised by the community indicates that more

efforts are needed with this community.

Evidence provided to close the NC

NC Status: Open

NC #: 2014-07 **Type of NC – Major or Minor:** Minor

Standard requirement : Indicator 6.2.6

Non-compliance:

The documents used by employees as a reference to identify species at risk is incomplete and does not contain all the species, as indicated on the document Species at Risk and High Conservation Value Species on CBPPL Limits.

Evidence provided to close the NC

NC Status: Open

4.2 Difficult Assessments

No specific aspects were difficult to assess during this audit.

4.3 Status of previous non-compliances

NC #: 2012-14 **Type of NC – Major or Minor:** Minor

Standard requirement : Indicator 6.3.4

Non-compliance:

The pre-industrial report does not show strong quantitative evaluations of the various forest communities across space, at least across the many ecological districts and ecotypes currently recognized on CBPPL land. It is important to develop the best means possible for judging whether pre-industrial communities are under-represented and where their retention is possible.

Evidence provided to close the NC

Kruger Inc. is one of the FPAC member companies that signed the Canadian Boreal Forest Agreement (CBFA). CBPPL Tenure is within the boreal forest and therefore subjected to the terms and conditions of this agreement. The Newfoundland Regional Working Group (NRWG), consisting of Newfoundland signatories to the CBFA (Canadian Park and Wilderness Society, the Canadian Boreal Initiative and CBPPL), was established in May 2012 to address Goals 2 & 3 of the CBFA. The NRWG also requested representatives from the following joint working group to provide local expertise and knowledge in the areas of protected areas and caribou: Parks and Natural Areas Division and Institute for Biodiversity & Ecosystem Science in the provincial Department of Environment and Conservation; the Centre for Forest Science and Innovation in the provincial Department of Natural Resources; the Canadian Forest Service; the Miawpukek First Nation; and Qalipu Mi'kmaq Indian First Nation. The NRWG took over the work of the committee previously formed by CBPPL

Goal 2 of the CBFA is “The completion of a network of protected areas that, taken as a whole, represents the diversity of ecosystems within the boreal region and serves to provide ecological benchmarks”. Using A Methodological Framework for the Protected Areas Planning in Support of the Canadian Boreal Forest Agreement (developed by a national independent science committee), the NRWG has assessed the NASP against the Methodological Framework and identified gaps. At present, the NRWG is working

though the Methodological Framework to identify protected areas planning for the island of Newfoundland to complement the NASP. This CBFA protected areas planning work should be completed by the Fall of 2014.

CBPPL has set aside large area under the process with CBFA. These large areas encompass forest units and communities that may be under represented on the DFA. The PIC report indicates that the forest conditions during the pre-industrial period is non-existent. Thus, the assessment of forest conditions prior to 1890 is based mainly on back casting the present forest conditions and the forest successional predictions that were documented for Newfoundland in the 1960's by Dr. A.W.H. Damman. As well, the opinions of a variety of forestry experts were also incorporated into the report. Considering the lack of documentation of pre-industrial forest conditions, discussions in this report was based on the assumptions that, during the pre-industrial time, fires were fewer, insect outbreaks were similar in both frequency and intensity, logging disturbances were minimal and did not cause significant changes in successional patterns, and that, while remarks about "back casting" are based on a the proven Damman forest classification, some components of the back casting might still be considered somewhat hypothetical. Review of the forecast for the 100 year period shows and increases in the mature and over mature age class and a reduction of balsam and an increase of spruce.

Deferral areas identified on CBPPL districts are areas of interest that are being evaluated as benchmark in the first place. The evaluation will now focus on intactness, dendritic/hydrology connectivity and shape efficiency. We consider that the deferral areas will help to increase the abundance of forest communities being under represented at this time.

NC Status: Closed, August 19 2014

NC #:	2012-22	Type of NC – Major or Minor:	Minor
Standard requirement :	Indicator 6.3.17		
Non-compliance:			
Although the current documentation (SOP and 5 year plan) includes provisions for the protection of riparian zones it does not reflect the same verbiage as found in the indicator 6.3.17 and 6.3.18 to ensure that when required the additional 45 metres measured from the end of the inner riparian reserve is applied at the operational level and that when required adequate measure are applied to ephemeral stream and not only those visible on a 1:50,000 map.			
Evidence provided to close the NC			
The FSC standard requires protection to all permanent bodies of water. At the time of the audit the SOP had not been updated to reflect such protection, in particular for the permanent unmapped brook.			
NC Status:	Upgraded to a major NC. See NC 2013-01		

NC #:	2012-23	Type of NC – Major or Minor:	Minor
Standard requirement :	Indicator 6.4.1		
Non-compliance:			
CBPPL relies at this time on the NSAP system used by DNR for the identification of the protected areas. Since the NSAP has not yet been released, CBPPL does not know where the candidate protected areas evaluated by DNR for the 11 ecoregions part of the FMUs are. This situation prevents CBPPL to fully			

evaluated its potential contribution to network of protected areas

Evidence provided to close the NC

Kruger Inc. is one of the FPAC member companies that signed the Canadian Boreal Forest Agreement (CBFA). CBPPL Tenure is within the boreal forest and therefore subjected to the terms and conditions of this agreement. The Newfoundland Regional Working Group (NRWG), consisting of Newfoundland signatories to the CBFA (Canadian Park and Wilderness Society, the Canadian Boreal Initiative and CBPPL), was established in May 2012 to address Goals 2 & 3 of the CBFA. The NRWG also requested representatives from the following join the working group to provide local expertise and knowledge in the areas of protected areas and caribou: Parks and Natural Areas Division and Institute for Biodiversity & Ecosystem Science in the provincial Department of Environment and Conservation; the Centre for Forest Science and Innovation in the provincial Department of Natural Resources; the Canadian Forest Service; the Miawpukek First Nation; and Qalipu Mi'kmaq Indian First Nation. The NRWG took over the work of the committee previously formed by CBPPL (last paragraph).

Goal 2 of the CBFA is “The completion of a network of protected areas that, taken as a whole, represents the diversity of ecosystems within the boreal region and serves to provide ecological benchmarks”. Using A Methodological Framework for the Protected Areas Planning in Support of the Canadian Boreal Forest Agreement (developed by a national independent science committee), the NRWG has assessed the NASP against the Methodological Framework and identified gaps. At present, the NRWG is working though the Methodological Framework to identify protected areas planning for the island of Newfoundland to complement the NASP. This CBFA protected areas planning work should be completed by the Fall of 2014.

CBPPL has set aside large area under the process with CBFA. These large areas encompass forest units and communities that may be under represented on the DFA. The PIC report indicates that the forest conditions during the pre-industrial period is non-existent. Thus, the assessment of forest conditions prior to 1890 is based mainly on back casting the present forest conditions and the forest successional predictions that were documented for Newfoundland in the 1960’s by Dr. A.W.H. Damman. As well, the opinions of a variety of forestry experts were also incorporated into the report. Considering the lack of documentation of pre-industrial forest conditions, discussions in this report was based on the assumptions that, during the pre-industrial time, fires were fewer, insect outbreaks were similar in both frequency and intensity, logging disturbances were minimal and did not cause significant changes in successional patterns, and that, while remarks about “back casting” are based on a the proven Damman forest classification, some components of the back casting might still be considered somewhat hypothetical. Review of the forecast for the 100 year period shows and increases in the mature and over mature age class and a reduction of balsam and an increase of spruce.

Deferral areas identified on CBPPL districts are areas of interest that are being evaluated as benchmark in the first place. The evaluation will now focus on intactness, dendritic/hydrology connectivity and shape efficiency. We consider that the deferral areas will help to increase the abundance of forest communities being under represented at this time.

NC Status: Closed, Aug 19 2014

NC #:	2013-01	Type of NC – Major or Minor:	Major
Standard requirement :	Indicator 6.3.17		
Non-compliance:			

Minor NC 2012-22 Upgraded to Major

Although the current documentation (SOP and 5 year plan) includes provisions for the protection of riparian zones it does not reflect the same verbiage as found in the indicator 6.3.17 and 6.3.18 to ensure that when required the additional 45 meters measured from the end of the inner riparian reserve is applied at the operational level and that when required adequate measure are applied to ephemeral stream and not only those visible on a 1:50,000 map.

Evidence provided to close the NC

Update of October 22 2013

Root cause analysis presented October 22 2013.

Noted in the Woodlands operation meeting minutes Aug 2013 " Discussed the identification of permanent streams. " Effective immediately all permanent streams must be buffered. If a stream has a defined channel and has water in it then it is a permanent stream. In future, harvest areas will be surveyed in summer to determine their status, permanent or centerline."

Noted in the Woodlands operation meeting minutes Sept 2013 - Permanent stream ID, Need to buffer all permanent streams (streams that have running water all year round). Environmental manager discussed this issue and read Planning and Development Superintendent's email to planners on the plan going forward. For upcoming winter or spring areas where planning has already been done, there will be no change on how they are handled. Any new work will require all streams with a defined channel of any width to be buffered unless no water is present at that time.

A Standard Operation Procedure (P-01 Determining Buffer Requirements for Unmapped Streams) has been revised to aid supervisors and planning personal in determining permanent water bodies and the method of recording them for future reference. A specific note was added to the Harvesting & Road Construction Pre-work form re; unmapped brook.

Reviewed PL01 Buffer requirements for Unmapped Streams, Pre work form

NC Status: Closed, October 2013

NC #: 2013-02 **Type of NC – Major or Minor:** Minor

Standard requirement : Indicator 8.2.6

Non-compliance:

Observations in the field demonstrated that one stream crossing was not adequately installed and centerline stream crossing not installed Some oil spills (patches) were not picked up in one particular operation

Evidence provided to close the NC

The Oil Spill was cleaned up, the centerline stream crossing was cleared of debris and a culvert installed. The stream crossing not adequately installed due to not being countersunk at the outlet was fixed. Boulders were placed below the outlet to back up water into the culvert thus allow fish passage.

Incidents were reviewed at operations Meetings and the importance of proper supervision and conducting our operation in accordance with legal requirements and standard operating procedures (SOP) was stressed. Emphasis has been placed on looking for oil spills for the remainder year during #2 EMS compliance inspections, and findings will be evaluated at the inspection review at the end of the year.

Pre work meetings stresses the importance of close supervision and the importance of following all standard operating procedures.

A plan has been developed to review all road building SOPs with excavator operators during the 2014 road building season.

Monetary holdbacks associated with road building contracts will be held until CBPPL is satisfied that all quality and environmental issues are addressed.
CBPPL is committed to continuing with weekly Quality and Environmental inspections on all road jobs.

During field audit no deviation found

NC Status: Closed, August 19 2014

NC #: 2013-03 **Type of NC – Major or Minor:** Minor

Standard requirement : Indicator 1.6.3

Non-compliance:

The applicant did not submit to SAI Global documents with FSC trademarks for approval as required by FSC-STD-50-001 V1-2

Evidence provided to close the NC

CBPPL has been submitting other trademarks for approval during the year since last audit.

Request made for – Visitor Orientation checklist March 2014

- PPT presentation on Current certification

Internal audit report cover

NC Status: Closed, Aug. 19 2014

NC #: 2013-04 **Type of NC – Major or Minor:** Minor

Standard requirement : Indicator 6.3.1

Non-compliance:

The information about forest condition (forest age, intact habitat, species composition, remoteness) and the results of operational activities needed to be spatially depicted over the long-term planning horizon are not available.

Evidence provided to close the NC

- Forest Age – Age class maps can be produced for 100 years - COMPLETED
- Intact Habitat – CBPPL will ask its Science Advisory Committee to evaluate the feasibility of defining and incorporating habitat requirements of certain species into the wood supply analysis prior to it being run. – AT THIS TIME DNR DOES NOT HAVE THE HABITAT REQUIREMENTS IN THE WOOD SUPPLY MODEL. HOWEVER, THE AGE CLASS AND STAND COMPOSITION INFORMATION AND DISTRIBUTION IS USED TO EXTRAPOLATE INFORMATION.
- Species composition – This is currently being worked on to stratify species rather than hardwood and softwood. CPPPL will continue to support this initiative.
- Remoteness – Remoteness as defined by the standard and the HCV F Assessment Report for intact forest landscapes can be mapped when spatial maps are produced.

DNR has produced example of maps and chart representing the forest conditions over the 100 year period.

NC Status: Closed, Aug. 19 2014

4.4 Opportunities for Improvement

6.3.5 CBPPL must continue to seek clarification from FSC Canada related to this indicator 6.3.5 and its conflict with Forest Management strategies of the Newfoundland and Labrador provincial government as per indicator 1.4.1

Consider finding an alternative to bailed hay as a required component of the emergency response plan.

Consider evaluating the need to maintain a level of harvesting in the districts of high concentration of balsam fir in order to potentially mitigate the impact of a spruce budworm epidemic

Consider clarifying with the NGO the basis of their evaluation and review the sources of information of the CPAWS-NCC GIS project that was funded by the MEC GIS which results indicated that 40-50% of the CBPPL LLEV in the Zone 3 (Bay d'Espoir) tenure was compromised and would not qualify as intact.

4.5 Recommendation to maintain the certificate

Corner Brook Pulp and Paper has demonstrated, subject to the correction of the non-conformities, that the described system of management is being implemented consistently over the whole forest area covered by the scope of the certificate. The areas of non-conformance identified during the audit are documented in the attached Non-conformance reports. As discussed during the closing meeting, please submit a root cause analysis and an action plan within 30 days. Major non-conformance(s) must be closed within 90 days. Minor non-conformances will be reviewed at the time of the first surveillance audit. However, a root cause analysis an action-plan must be submitted for approval for each minor non-conformance within 30 days. The implementation of the actions will be verified at the next surveillance audit.

The action plan and evidence received for the major non-conformance 2014-01 allowed for its closure. The action plans received for the minor non-conformances have been reviewed and accepted by the time this report was finalized. Therefore the audit team makes the recommendation to maintain the registration.

5.0 GROUP MEMBERSHIP LIST (UPDATE)

Not applicable

6.0 COMPLAINTS, DISPUTES AND APPEALS PROCESS

On receiving a complaint the relevant details are recorded on a complaint register by the person receiving the complaint.

A SAI Global person is responsible for the handling of complaints/appeals, and forwards the complaint on to the respective Manager in charge of SAI Global FSC Program for resolution.

An initial response, including an outline of the proposed course of action to follow up on the complaint, will be sent within two (2) weeks of receiving the complaint.

SAI Global will keep the complainants informed of progress in evaluating the complaint. An investigation of the allegations and all its proposed actions in response to the complaint/appeal will be dealt within three (3) months of receiving the appeal. Upon completion of the investigation a full report of the investigation and its findings are then sent to the complainant. Full implementation of actions and confirmation of implementation (e.g. correction and closing out of non-compliances that may have been identified as a result of the complaint) outlined in the final report will be completed.

SAI Global ensures that the persons engaged in the appeals, complaints and disputes handling processes are different from those who carried out the audits, made the certification decisions and the day to day implementation.

If the issue has not been resolved through the full implementation of SAI Global's procedures the person or organization raising the complaint/dispute/appeal has the opportunity to refer their complaint/dispute/appeal to FSC's dispute resolution process.

END OF THE REPORT