

# ASI-ACCREDITATION SERVICES INTERNATIONAL GmbH

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## FSC Annual Surveillance of GFA for 2007

Forest Management Audit to Land Mecklenburg-Vorpommern,  
Germany (GFA-FM/COC-1103)

Date of audit: 17-18 July 2007

### PUBLIC SUMMARY

	NAME	DATE
Report drafted by:	Hans Joachim Droste	17 March 2008
Reviewed by ASI:	Dr Carlos Ruiz-Garvia	10 April 2008
Reviewed by CAB:	Gerhard Kuske	09 May 2008
Finalized by ASI:	Hans Joachim Droste	13 May 2008
Report last updated:		

## Credits

The author would like to thank Carsten Huljus from GFA and the audit team, Eckhardt Lange and Thorsten Specht, as well as Dr Röhe from the "Ministerium für Landwirtschaft, Umwelt und Verbraucherschutz Mecklenburg – Vorpommern" and his team for preparing and making the arrangements that made this assessment possible and efficient. ASI would also like to thank all stakeholders for submitting their comments and for sharing their concerns.

### 1 Background of the assessment

The operation audited by GFA

<b>Name of operation</b>	Land Mecklenburg-Vorpommern [National Park Protectorates in Mecklenburg-Western Pomerania]
<b>Type of certificate</b>	Single FM with 3 FMUs
<b>Total area</b>	Approx. 23.000 ha
<b>Type of forests</b>	temperate natural and semi-natural forests
<b>Name of contact person</b>	Dr P. Röhe
<b>Address</b>	Ministerium für Landwirtschaft, Umwelt und Verbraucherschutz Mecklenburg – Vorpommern Paulshöher Weg 1 19048 Schwerin
<b>Country</b>	Germany
<b>Phone number</b>	+49 385 588 6211
<b>Fax number</b>	+49 385 588 6024
<b>URL</b>	www.mv-regierung.de
<b>E-mail address</b>	p.roehe@lu.mv-regierung.de

Brief description of the operation

Three FMUs (NP "Vorpommersche Boddenlandschaft", NP "Jasmund" and NP "Waren-Müritz") are included in the scope of this certificate. The three FMUs are classified as National Parks according to German law and are managed for nature protection. All areas are classified as High Conservation Value.

The certification history

<b>Pre-audit</b>	Summer 2003
<b>Main audit:</b>	15.10. – 17.10.2003
<b>Date of certificate issue</b>	01 Jan 2004
<b>Date of 1<sup>st</sup> surveillance</b>	14.-15.12.2004
<b>Date of 2<sup>nd</sup> surveillance</b>	11.-13.5.2005
<b>Date of 3<sup>rd</sup> surveillance</b>	16.- 17.03.2006
<b>Suspension close-out audit</b>	05.12.2006
<b>Date of 4<sup>th</sup> surveillance</b>	17.-18.07.2007 (this audit)
<b>2<sup>nd</sup> suspension</b>	Starting 23 October 2007

FSC Forest Management Surveillance Audit of GFA for 2007: Darss

ASI Assessment Details

<b>Purpose of assessment</b>	Annual surveillance assessment
<b>ASI lead assessment</b>	Hans Joachim Droste (Accreditation Program Manager)
<b>Local Expert/ translator</b>	n/a
<b>Language</b>	German
<b>Sites visited</b>	NP "Vorpommersche Boddenlandschaft" and NP "Jasmund"

Agenda of the GFA audit

<b>17 July 2007</b>	<b>National Park Vorpommersche Boddenlandschaft</b>
09:00 – 09:30	Opening meeting at Nationalparkamt Vorpommern in Born
09:30 – 12:00	Review of documents and records
12:00 – 13:00	Report on the work of the wildlife and game working group
14:00 – 18:00	<u>Field trips</u> Stop 1: Josaarsbruch; controversial pond establishment Stop 2: Abt. 44 a2; PEINT PLANT site Stop 3: Abt. 53 B 3; thinning of alder Stop 4: Abt. 73 a 1; planting site Stop 5: fire break; game meadow (no soil prep) Stop 6: Abt. 71; controversial cutting of trees Stop 7: Abt. 369 B 6; mechanical thinning site Stop 8: Abt. 363 B 5; transition from exotic to domestic tree species Stop 9: flood protection; compensation measures Stop 10: Abt. 374; planting site after storm event
18:00 – 20:00	Meeting with stakeholders
<b>18 July 2007</b>	<b>National Park Jasmund</b>
09:00 – 09:30	Opening meeting at Sassnitz Office
09:30 - 15:30	<u>Field trips</u> Stop 1: Abt. 1388; illegal cutting of beech trees Stop 2: Abt. 1375; illegal cutting of birch trees Stop 3: Abt. 1310; illegal cutting of beech trees Stop 4: Abt. 1237; game damage monitoring site # 10 Stop 5: Abt. 1320; game damage monitoring site # 08 Stop 6: Abt. 1306; health and safety of forest work Stop 7: Abt. 1307 A 2; thinning in spruce stand Stop 8: Abt. 1302; thinning in beech stand
15:30 – 16:00	Internal GFA auditor meeting
16:00 – 17:00	Closing meeting
17:00	Adjourn and ASI feedback

People involved in the audit

<b>GFA team</b>	E. Lange (lead auditor, freelancer) Th. Specht (co-auditor, freelancer) C. Huljus (observer on day 1, GFA Group)
<b>Operation</b>	Dr. Röhe (Ministry, in charge of FSC certification) Mr Brosowski (Head of National Park Office) Dr. Weigelt (Head of NP Jasmund) Mr Hackert (National Park office) Mr Oswald (National Park office administrator) Mr Brandt (member of the working group for game management) Mrs Jasmand; Mr Merx, Mr. Schröter, Mr. Merting (foresters)
<b>Others</b>	Various stakeholders (names are known to ASI)

**2 Assessment objectives and planning**

The objectives of this forest management surveillance assessment are:

1. Evaluation of certification body's performance in implementing the accredited certification system in accordance with FSC accreditation requirements.
2. Witness an audit team to determine whether or not the team:
  - a) adequately applies the procedures and instructions of the certification body;
  - b) members exhibit the characteristics of an auditor as detailed in ISO 19011;
  - c) has the required expertise of the sector in which the audit is being undertaken;
  - d) applies appropriate expertise in the correct sense;
  - e) undertakes the audit effectively and draws correct conclusions.
3. Evaluation of the conformity of the certificate holder with FSC and certification body's certification requirements in so far as this is necessary to verify the performance of the certification body.
4. Evaluation of stakeholder comments or complaints ASI received in relation to this operation.

ASI annual surveillance assessments are based on a sample of the valid certificates of the audited CAB within the scope of accreditation. The number of audits per year is determined by ASI surveillance policy; sampling is based on the ASI sampling procedure. ASI conducts witness audits following the recommendations of the ISO/ IAF Accreditation Auditing Practice Group (APPG) published in 2005. Due to the nature of the ASI surveillance procedure, the audit evidence is only based on a sample of the information available and therefore there is always an element of uncertainty in the audit findings.

### 3 Terminology

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

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

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

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

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

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

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

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

**Nonconformity:** The absence of, or the failure to implement and maintain, one or more management system requirements of the reference standards, or a situation which would, on the basis of available objective evidence raise significant doubt as to the credibility of the certificates issued by the CAB.

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

#### Major Nonconformity (Category 1)

A systematic failure or significant deficiency -either as a single incident or a combination of a number of similar incidents- in a significant part of the quality system, or the lack of implementation of such a part, governed by applicable standards. A number of minor nonconformities against one requirement of the applicable standards can represent a total breakdown of the system and thus be considered a major nonconformity

#### Minor Nonconformity (Category 2)

An isolated or sporadic lapse in the content or implementation of procedures or records which could reasonable lead to failure of the system if not corrected. If a pattern of minor nonconformities occurs over successive assessments, it may represent a total breakdown of the system and a major nonconformance is issued.

#### Observation (Category 3)

An area of concern, a process, document, or activity that is currently conforming that may if not improved, result in a nonconforming system,

product or service. Observations shall be recorded in the audit report for the benefit of the customer.

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

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

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

#### 4 ASI stakeholder consultation process

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

1. Announcement of the assessment on the FSC electronic fora about one month prior to the assessment to solicit stakeholder comments;
2. Individual interviews with selected key-stakeholders prior, during and after the assessment.

In Part 1 ASI received comments from:

- Förderverein Nationalpark Boddenlandschaft e.V. ("Friends of the National Park Boddenlandschaft")
- NABU Germany
- BUND / FoE (Chapter Mecklenburg-Vorpommern)
- WWF Germany
- Greenpeace Germany
- ANW (Chapter Mecklenburg-Vorpommern)
- Sierra Club, USA
- FSC Germany

In some cases, maps and photographs were attached as evidence for non-compliances. ASI would like to thank all stakeholders for submitting their comments and for sharing their concerns.

In Part 2, the ASI lead auditor called and met with some of the stakeholders who provided comments in advance to get a better understanding of their concerns.

Main stakeholder comments	ASI response
Unacceptably high deer populations that do not allow the forest to regenerate naturally (breach of Indicator 6.3.a3 of the German FSC Standard)	Confirmed; GFA issued MAJOR CAR 2007-7 in this audit.
Protection of exotic tree species (breach of Indicator 6.3.b1 of the German FSC	The responsible National Park authorities stated that all protection measures had been removed

FSC Forest Management Surveillance Audit of GFA for 2007: Darss

Standard and NP regulations)	at the time of this audit. The audit team could not find protections any more.
Cutting and removing of dead wood (breach of Indicator 6.3.c4 of the German FSC Standard and NP regulations)	The audit team visited the site. A broken tree (damaged by felling of another tree) was cut for protection of public; the cut tree was left on site as per regulations.
Application of prohibited soil cultivation method (i.e. PEIN PLANT), (breach of Indicator 6.5.5 of the German FSC Standard)	Confirmed; GFA issued MAJOR CAR 2007-6 in this audit.
Planting with high numbers of seedlings (breach of Indicator 6.3.a1 of the German FSC Standard and NP regulations)	Confirmed in this audit by GFA audit team; addressed by minor CAR 2007-21.
Establishment of a pond at "Josaarsbruch" (Compartment 55) without any consultation or environmental impact assessment (breach of Indicator 6.1.5 of the German FSC Standard and NP regulations).	Confirmed; was done by the certificate holder without required stakeholder consultation. GFA issued CAR 2007-5.
GFA does not provide on their website translated versions of their complaints/appeal procedure	This is not required by FSC or ASI. There only has to be summary information about the existence of the procedure. Addressed in the 2007 office audit at GFA HQ in Hamburg.
GFA does not provide on their website translated versions of their audit reports as required.	ASI already detected this problem in the last office audit. A CAR by ASI is pending to improve the situation.
GFA did not adequately consider the issues raised by stakeholders	In this audit, GFA paid a lot of attention to stakeholder inputs. Basically, the whole audit agenda (FMUs and sites) was designed around issues raised by stakeholder. The public summary of this report responds to each point raised by stakeholders and outlines the conclusions. The GFA audit team met with stakeholders on several occasions during the audit.
Communication between GFA and stakeholders is insufficient, e.g. no information about the results of an audit after the audit, report submitted 6 months after main audit.	ASI verified and addressed this issue during a previous audit. Public reports must generally be available within 60 days after the audit. In addition to the summary report, certification bodies are not required to provide individual response to stakeholders after an audit.
GFA did not announce the 2004 surveillance in time to stakeholders.	This is not formally required by FSC / ASI for surveillance audits, just for the main audit.
GFA approved the PEIN PLANT method without being authorized to do so.	GFA states that they never approved the application of this method. It was a misinterpretation by the certificate holder due to misleading formulation of the CAR by GFA. <b>CAR.GFA.FM.2007.01</b>
1 <sup>st</sup> Suspension was lifted without	This issue was discussed with stakeholders at

FSC Forest Management Surveillance Audit of GFA for 2007: Darss

<p>sufficient performance evidence in the field</p>	<p>the FSC Germany meeting in Hamburg. ASI shares the view that CARs should only be closed based on objective close-out evidence if implementation is ensured <b>REC.GFA.FM.2007.01.</b> In principle, a legally binding decree by the Ministry can be considered sufficient documented evidence. If a CAB has reasonable doubts whether a document will be sufficient evidence for solving a problem, further evidence for implementation should be requested in addition.</p>
<p>We also make the assumption that, because the FSC does not certify protected area management, this certificate certifies extractive timber management.</p>	<p>Rules and regulations of FSC do not prohibit the certification of protected areas. As a matter of fact there are several valid pure FM FSC certificates at the moment, for the main management objective of protection or recreation, and where no timber is extracted for commercial purposes (see fsc-info.org)</p>
<p>The certified area consists of designated National Parks, a protected land classification within which resource extraction is normally prohibited.</p>	<p>The National Parks are divided into several zones. Within the development zone, harvesting of a certain type and magnitude is still allowed by law and the National Parks regulation.</p>
<p>The certified area is not a single, coherent management unit but a patchwork of geographically separate, selectively grouped, and apparently differently-managed areas managed by different legal entities – a very peculiar version of the already-controversial concept of “partial certification”.</p>	<p>The certified area covers the 3 National Parks NP "Vorpommersche Boddenlandschaft", NP "Jasmund" and NP "Waren-Müritz" located in the German state of Mecklenburg-Vorpommern. All of them have separate management plans but all are managed according to the same set of laws and regulations under the direct authority of the <i>Ministry for Agriculture, Environment and Consumer Protection, Mecklenburg Pomerania</i>. The issue of partial certification was discussed and analysed by GFA in the main audit and is documented in the corresponding public summary report according to FSC policy and standards. ASI doesn't detect any nonconformity.</p>
<p>The Public Summary reveals several management failures: 1) From the very first assessment a continuing problem has been repeatedly noted regarding unsatisfactory game management, and has been the subject of CARs at every subsequent audit. 2) several unfulfilled CARs concern violations of law 3) the forest manager is unable to ensure that its management plan is actually</p>	<ol style="list-style-type: none"> <li>1. Game management is an ongoing problem. ASI considers that this issue was not rigorously enough treated by GFA from the beginning (see <b>CAR.GFA.FM.2007.03</b>).</li> <li>2. Violations of law / regulations have been confirmed by GFA and ASI. ASI confirms that corrective action taken by GFA is generally in line with FSC requirements.</li> <li>3. The new forest management plans are not yet ready. The date for finalizing the plan for NP Vorpommersche</li> </ol>

FSC Forest Management Surveillance Audit of GFA for 2007: Darss

implemented	Boddenlandschaft is scheduled by the end of 2007. The development of the plan for NP Jasmund will start in 2008. Currently, all FMUs operate with figures from the former Eastern German forest planning system ("Datenspeicher Wald") together with the rules and regulations from the National Park authorities. ASI considers this sufficient for conditional compliance with Criterion 7.1.
GFA allowed a timeline of 24 months for minor CARs	This is in line with FSC requirements. FSC-STD-20-002 Clause 8.3.3 does allow certification bodies to issue timelines of up to 24 months for minor CARs.
GFA did not adequately and timely respond to stakeholders	There is no requirement that specifies individual and timely responses to stakeholder comments by certification bodies. Timelines are only attached to formal complaints submitted by stakeholders (6 months, FSC-STD-20-001 Clause 14.2.1). However, certification bodies must make public after 6 months, how stakeholder comments were considered. The publication of the summary report is generally accepted as being sufficient to comply with this rule. Nevertheless, ASI encourages certification bodies to respond individually to stakeholders who expressed their concerns in the certification process, but again, this is currently not mandatory to do so.
Protection measures for exotic tree species which are to be removed.	The certificate holder confirmed that all protections have been removed. GFA and ASI could not find protections any more in this audit. Therefore, this issue is considered closed.

5 Assessment findings

CAB AUDIT PERFORMANCE	
FSC requirements	Findings and conclusions
Auditor qualification (20-004)	This audit was conducted by a 2 person team: Mr Lange and Mr Specht. Mr Specht was already a team member on the main audit. Both auditors are professional senior foresters and have the required qualification and experience to conduct FSC forest management audits in Germany.
Standard adaptation (20-003)	GFA used the FSC accredited Forest Stewardship Standard for Germany (Version 2004). Therefore, a local adaptation process was not required.
Pre-audit (20-005)	Pre-audits are mandatory for operations with high conservation values and for operation larger than

FSC Forest Management Surveillance Audit of GFA for 2007: Darss

	<p>10.000 ha. Both criteria are applicable in the case of this certificate. The pre-audit here was carried out in Summer 2003. Basic information is included in the public summary report as required.</p>
Stakeholder consultation (20-006)	<p>The evaluation of the formal Stakeholder consultation process at the beginning of this project was not included in the scope of this assessment. It has been noted, however, that GFA was reported to be not very responsive and that the public summary was delayed. This will be subject of the next office surveillance. In this audit however, there was a clear focus on issues raised by stakeholders.</p>
Evaluation process (20-007)	<p>Corrective action for pending CARs was thoroughly reviewed. The audit was structured and conducted following the FSC requirements for surveillance audits as well as the recommendations of ISO 19011. 4 auditor days (2 days with 2 auditors) are acceptable to audit the two sites which were sampled in this audit. The majority of the audit time was spent in the forest.</p> <p>Good selection of sites according to the issues raised by stakeholders prior to the audit. The sites visited included areas affected by high deer populations, pond establishment, unauthorized cuttings, the Pein Plant method, deer monitoring fences, planting and compensation areas. The sites were selected by the GFA lead auditor without any impact from the certificate holder.</p> <p>Interviews were conducted with stakeholders and forest workers. In certain situations, forest workers did not have the chance to speak freely without the presence of their supervisors <b>(CAR.GFA.FM.2007.02)</b></p>
Decision making (20-002 Part 2)	<p>A number of CARs were repeatedly extended and therefore upgraded too late <b>(CAR.GFA.FM.2007.03)</b>.</p> <p>This refers to the following CARs: social impact assessment: 2003-9, 2004-6, 2005-6 hunting: 2004-2, 2005-4, 2006-4, 2007-7 workers safety: 2004-1, 2005-2, 2006-6, 2007-2/2007-4 management plan: 2003-8, 2004-5, 2005-5, 2006-7, 2007-16 monitoring: 2003-11, 2004-7, 2005-7 soil cultivation: 2004-3, 2006-3, 2007-6</p> <p>Non-compliances or suspension could have been launched earlier, if GFA had implemented the rules of FSC more strictly. The suspension of the certificate was probably justified even 1 or 2 years earlier than the current first suspension.</p>

FSC Forest Management Surveillance Audit of GFA for 2007: Darss

	<p>The numbering of some CARs has changed from 2005 to 2006. This makes it difficult to track the history of the noncompliances. This refers to:                  Hunting: # 2005-4 in 2005 report, displayed as #2005-3 in the 2006 report                  Management plan: # 2005-5 in 2005 report, displayed as # 2005-4 in the 2006 report  <b>CAR.GFA.FM.2007.04</b></p> <p>In total, GFA issued 7 MAJOR and 13 MINOR CARs as a result of this audit. As this number of noncompliance indicates a breakdown of the system, GFA subsequently suspended the certificate. This is in line with FSC and GFA decision making procedures.</p>
Auditor performance (ISO 19011)	<p>The GFA audit team conducted a professional and systematic audit. Audit evidence to verify continued compliance of the certificate holder with FSC certification requirements was adequately collected through interviews, evaluation of documents and records and field inspections. It should be avoided to discuss procedural questions in front of the certificate holder as happened in the closing meeting of this audit (<b>REC.GFA.FM.2007.02</b>). The ASI lead auditor highlights the objectivity, persistence and deliberateness of the GFA lead auditor considering the difficult and challenging audit situation.</p>
Audit report (20-008)	<p>The audit report was written by the lead auditor, Mr E Lange with contributions from Mr Th Specht covers 141 pages (including the 2006 update) and complies with FSC report writing requirements.</p>
Public summary (20-009)	<p>The public summary report was published on GFA website with delay. GFA was able to demonstrate that the delay was caused by an extended comment timeline granted to the certificate holder in a force majeure situation.</p>
Use of FSC trademark	Not included in the agenda of this audit.
Application of relevant FSC policies and guidelines	N/A

**6 Nonconformities and observations**

Major CAR(s)	Minor CAR(s)	Observations
--	<b>6</b>	<b>3</b>

See nonconformity reports (attached) for details.

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

*Note 2: Observations are related to an area of concern, a process, document, or activity that is currently conforming that may if not improved, result in a nonconforming system, product or service. Thus, observations which are not considered by the CB may lead to corrective action requests in the future.*

## **7 Conclusion and recommendation**

The GFA audit team conducted a professional and systematic annual audit.

Stakeholders submitted important comments about the performance of the certificate holder and GFA auditing prior to this assessment. ASI is satisfied with the CARs raised by GFA in this audit to address the detected nonconformities. ASI supports the decision of GFA to suspend the certificate due the large number of MAJOR nonconformities. ASI however would like to clarify that the circumstance of certifying a National Park is not the underlying cause of the problem. ASI believes that the FSC Principles and Criteria can be well applied to a broad range of situations, including the ones where conservation goals are the main objective, under the prerequisite of a strong commitment and willingness by the applicant / certificate holder.

Based on the findings of this assessment, the ASI lead assessor recommends to FSC AC the continuation of the FSC forest management accreditation for GFA, subject to the timely closing of the nonconformities identified during the audit and specified in the nonconformity reports (attached).

### **Attachments**

Nonconformity reports (NCRs)

Annex 1: Nonconformity reports (NCRs)

<b>ACCREDITATION SERVICES INTERNATIONAL GmbH</b>				
Charles-de-Gaulle-Str. 5 • 53113 Bonn, Germany • Tel.: +49 - 228 - 367 66 0 • info@accreditation-services.com				
<b>NONCONFORMITY / CORRECTIVE ACTION REQUEST</b>				
REF. No.	<b>CAR.GFA.FM.2007.01</b>	Date	<b>17 March 2008</b>	
Nonconformity detected by (name of auditor)		<b>Achim DROSTE</b>		
Through (e.g. office audit, document review)		<b>FM surveillance assessment</b>		
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> <b>MINOR</b> <input type="checkbox"/> OBSERVATION	
<b><i>CAR 2004-3 was phrased by GFA in a misleading manner, which created significant problems for the client in understanding and interpreting the CAR. It included the description of the nonconformity as well as an apparent approval of an exception (“Pein-Plant“ ist unter dieser Bedingung genehmigt”).</i></b>				
Normative Reference(s)		<b>ISO 65 Clause 11 b) FSC-STD-20-008 Clause 5.4.2</b>		
Corrective Action Request: <b>GFA shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.</b>				
Timeline for implementation		<b>Next ASI office assessment</b>		
Corrective Action implemented by Certification Body <b>To be filled by ASI</b>				
Corrective Action evaluated by ASI <b>To be filled by ASI</b>				
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:	
Comments:				

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>CAR.GFA.FM.2007.02</b>	Date	<b>17 March 2008</b>	
Nonconformity detected by (name of auditor)		<b>Achim DROSTE</b>		
Through (e.g. office audit, document review)		<b>FM surveillance assessment</b>		
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION		
<b><i>GFA auditors conducted interviews with stakeholders and forest workers in front of their supervisors and ministry representatives. This did not allow them to speak freely.</i></b>				
Normative Reference(s)	<b>FSC-STD-20-006 Clause 3.2</b>			
Corrective Action Request: <b>GFA shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.</b>				
Timeline for implementation		<b>Next ASI office assessment</b>		
Corrective Action implemented by Certification Body				
<b>To be filled by ASI</b>				
Corrective Action evaluated by ASI				
<b>To be filled by ASI</b>				
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:	
Comments:				

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>CAR.GFA.FM.2007.03</b>	Date	<b>17 March 2008</b>
Nonconformity detected by (name of auditor)		<b>Achim DROSTE</b>	
Through (e.g. office audit, document review)		<b>FM surveillance assessment</b>	
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> <b>MINOR</b> <input type="checkbox"/> OBSERVATION
<b>GFA extended the following CARs too often and upgraded them too late:</b> <i>social impact assessment: 2003-9, 2004-6, 2005-6</i> <i>hunting: 2004-2, 2005-4, 2006-4, 2007-7</i> <i>workers safety: 2004-1, 2005-2, 2006-6, 2007-2/2007-4</i> <i>management plan: 2003-8, 2004-5, 2005-5, 2006-7, 2007-16</i> <i>monitoring: 2003-11, 2004-7, 2005-7</i> <i>soil cultivation: 2004-3, 2006-3, 2007-6</i>			
Normative Reference(s)		<b>FSC-STD-20-002 Clause 8.5, 8.6</b> <b>GFA FM Auditor Handbook Section 2.6.2</b>	
Corrective Action Request: <b>GFA shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.</b>			
Timeline for implementation		<b>Next ASI office assessment</b>	
Corrective Action implemented by Certification Body			
<b>To be filled by ASI</b>			
Corrective Action evaluated by ASI			
<b>To be filled by ASI</b>			
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:
Comments:			

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>CAR.GFA.FM.2007.04</b>	Date	<b>17 March 2008</b>	
Nonconformity detected by (name of auditor)		<b>Achim DROSTE</b>		
Through (e.g. office audit, document review)		<b>FM surveillance assessment</b>		
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION	
<p><i>The numbering of some CARs in the GFA audit reports has changed from 2005 to 2006. This makes it confusing to track the history of the noncompliances. This refers to:                  Hunting: # 2005-4 in 2005 report, displayed as #2005-3 in the 2006 report                  Management plan: # 2005-5 in 2005 report, displayed as # 2005-4 in the 2006 report</i></p>				
Evidence / Normative Reference(s)		<b>FSC-STD-20-008 Item 4.3 (Box 2)</b> <b>GFA Audit reports dated 06 August 2005 and 24 April 2006</b>		
Corrective Action Request: <b>GFA shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.</b>				
Timeline for implementation		<b>Next ASI office assessment</b>		
Corrective Action implemented by Certification Body				
<b>To be filled by ASI</b>				
Corrective Action evaluated by ASI				
<b>To be filled by ASI</b>				
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*		Name auditor:		Date:
Comments:				

## ACCREDITATION SERVICES INTERNATIONAL GmbH

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

### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>CAR.GFA.FM.2007.05</b>	Date	<b>17 March 2008</b>	
Nonconformity detected by (name of auditor)		<b>Achim DROSTE</b>		
Through (e.g. office audit, document review)		<b>FM surveillance assessment</b>		
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> <b>MINOR</b> <input type="checkbox"/> OBSERVATION	
<p><i>The original proposal from the GFA auditors was to grade CAR 2007-5 as MAJOR in the draft report, but following the certificate holder's comments it was downgraded to a MINOR. ASI cannot follow why the comments received were interpreted by GFA as being sufficient to downgrade the CAR. It should be irrelevant whether the problem was already detected in 2006 or in 2007. This can happen in an audit system based on sampling. The major noncompliance however still remains the same.</i></p>				
Normative Reference(s)		<b>FSC-STD-20-002 Clause 8.3.2, 8.3.3</b> <b>GFA FM Auditor Handbook Section 2.6.2</b>		
Corrective Action Request: <b>GFA shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.</b>				
Timeline for implementation		<b>Next ASI office assessment</b>		
Corrective Action implemented by Certification Body				
<b>To be filled by ASI</b>				
Corrective Action evaluated by ASI				
<b>To be filled by ASI</b>				
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*		Name auditor:		Date:
Comments:				

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>CAR.GFA.FM.2007.06</b>	Date	<b>17 March 2008</b>	
Nonconformity detected by (name of auditor)		<b>Achim DROSTE</b>		
Through (e.g. office audit, document review)		<b>FM surveillance assessment</b>		
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> <b>MINOR</b> <input type="checkbox"/> OBSERVATION	
<p><i>In 2003, GFA issued minor CAR 2003-10 against the certificate holder for not marking their harvested timber with the FSC Logo. The CAR was reported closed in 2004. In 2007, a stakeholder complaint that the timber marking had stopped. The response of GFA to the stakeholder was that marking of harvested timber with the FSC logo was no FSC requirements. The information given to the stakeholder is in contradiction to GFA previous corrective action and requires clarification.</i></p>				
Evidence/ Normative Reference(s)		<b>GFA main audit report</b>		
Corrective Action Request: <b>GFA shall implement appropriate measures to correct the nonconformity detected in this audit and described above within the given timeline. The measures shall be adequate to correct the current problems and to eliminating causes of nonconformities in order to avoid recurrence.</b>				
Timeline for implementation		<b>Next ASI office assessment</b>		
Corrective Action implemented by Certification Body				
<b>To be filled by ASI</b>				
Corrective Action evaluated by ASI				
<b>To be filled by ASI</b>				
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*		Name auditor:		Date:
Comments:				