

ASI-ACCREDITATION SERVICES INTERNATIONAL GmbH

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FSC Annual Surveillance of IMO 2007

Forest Management Audit to IMO-FM/COC-99161

Date of audit: 3rd to 5th September 2007

PUBLIC SUMMARY

	NAME	DATE
Report drafted by:	Dr Martin Walter	10 September 2007
Reviewed by ASI:	Hans Joachim Droste	25 October 2007
Reviewed by CAB:	Thomas Papp-Vary	13 December 2007
Finalized by ASI:	Hans Joachim Droste	17 January 2008
Report last updated:		

Credits

The author would like to thank Walter Mattheis and all staff of Saarforst Landesbetrieb involved in the audit for preparing and making the arrangements that made this assessment possible and efficient.

1 Background

The operation audited by IMO

Name of operation	SaarForst Landesbetrieb
Total area	Approx 37.000 ha
Type of management	Natural forest management
Name of contact person	Mr W. Matheis
Address	Von der Heydt 12, D-66115 Saarbrücken
Country	Germany
Phone number	Tel.. +49-681-9712-0
Fax number	Fax: +49-681-9712-150
URL	
E-mail address	walter.matheis@saarforst.saarland.de

The certification history

Pre-audit	-
Main audit:	20.-23. June 2005, 21.-23. November 2005 (re-certification)
Date of certificate issue	4 th September 2000
Date of 1st surveillance	16 th – 19 th October 2006
Date of 2nd surveillance	3 rd – 5 th September 2007

ASI Assessment Details

Purpose of assessment	Surveillance of IMO for forest management in 2007
ASI lead assessor	Dr Martin Walter
Local Expert/ translator	-
Language	German
Sites visited	Headquarter and different forest sites of Saarforst Landesbetrieb

Audit agenda

Date 3rd September 2007	
8.30 – 9.30	Opening meeting
9.30 – 11.00	Discussion on outstanding CARs
11.00 – 12.00	Discussion on measures for restoration of natural habitats
12.00 – 12.30	Lunch
12.30 – 13.30	Travel to compartment 7.1 Merzig
13.30 – 17.00	Visit to different sites in compartment 7.1 (ongoing harvesting)

	operation, recently finalised harvesting operation, weeding of planted sites, old beech stand harvested in 2006)
20.00 – 22.00	Discussion with stakeholder (ASI team leader without IMO team)

Date 4th September 2007

7.30- 8.15	Travel to compartment 4.1, Homburg
8.15 – 10.30	Visit of different sites in compartment 4.1 (harvesting of trees killed by bark beetle, thinning with harvester in broadleaved stand, implementation of dead wood concept)
10.30 – 11.00	Travel to compartment 4.2
11.00 – 13.00	Visit of sites in compartment 4.2 (interview with workers, safety issues, thinning in young stand of spruce and birch)
13.00 – 13.30	Lunch
13.30 – 17.00	Visit of sites at compartment 7.2 (game impact, harvesting impact, sites left open after storms in 1990)
17.00 – 18.00	Travel to hotel
19.00 – 20.00	Discussion of observation (ASI and IMO auditors)

Date 5th September 2007

7.00 – 8.00	Travel to Wadern Wädrl (Saarforst group certificate)
8.00 – 10.00	Visit of sites with intensive game impact in the community forest Wadern Wädrl
10.00 – 11.00	Travel to Saarforst headquarters
11.00 – 12.00	Closing meeting of the IMO audit
12.00 – 12.30	Closing meeting of ASI

People involved in the assessment

IMO	Mr Günter Heins, Lead Auditor
Operation	Mr W. Mattheis (contact person) Mr Tiemann, Pfaff, Scherer (forest engineers)
Others	Mr. Seizinger (observer, FSC Germany)

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 conducted as “*witness audits*” and are based on a sample of the valid certificates of the audited CAB within the scope of accreditation. The number of assessments per year is determined by ASI surveillance policy; sampling is based on the ASI sampling procedure. Due to the nature of ASI surveillance procedures, audit evidence is only based on a sample of the information available and therefore there is always an element of uncertainty in the assessments findings.

3 ASI stakeholder consultation process

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

- 1. public announcement of the audit on the FSC electronic fora and on the ASI website about one month prior to the audit to solicit stakeholder comments;
- 2. direct interviews with selected key-stakeholders, conducted by FSC Germany on behalf of ASI prior to the audit.

Stakeholder comments	ASI response
Most stakeholder comments reported an overall satisfactory performance of the operation. Comments refer to the relationship of the company to its clients, the measures for nature protection, and the overall good organisation	Noted.
Hunting issues were predominantly mentioned by stakeholders as being critical due to decreasing hunting intensity. Particularly the occurrence of red deer in some areas was deemed critical.	The damage caused by roe deer was checked during the audit. It could be observed that in some areas damage is above the level specified in the German FSC standard. The company is aware of this situation and intends to change the responsibilities in order to improve the situation. Damage by red deer was observed in some areas managed by Saarforst but was at least from what can be said from the audit observations not at a critical level. It is mainly influenced by high densities in neighbouring areas. Due to various stakeholder comments related to an area certified under the group certificate in Saarland the audit was extended in order to evaluate the situation. An analysis of this situation is given at the end of the report.

	IMO addressed the game problem through corrective action requests.
It was mentioned that the applied harvesting technologies are damaging to soils and remaining trees. The use of harvesting machines in broad leaved stands during the summer was considered as particularly critical.	During the audit broadleaved stands harvested mechanically were visited. Damages were at a low level and did not exceed those in coniferous stands. Saarforst staff was well aware of the risks involved in summer harvest in broadleaved stands and declared that harvesting operations with tree harvesters are not carried out during summer. In some harvesting operations skidding lines showed soil damages due to transport of timber under unfavourable conditions. This non-conformity was considered in IMO's corrective action requests.
Stakeholders mentioned the reform program executed in 2005 which lead to a sharp decrease of staff numbers and some turmoil in the organisation. The personnel situation was said to be critical and in some aspects (hunting intensity, control of contractors) not sufficient to maintain the envisaged performance level over the whole area.	It could be observed during the audit that indeed the current staffing levels are comparably low given the duties mainly of the forest engineers in operations. However, the decision on the number of posts is in the responsibility of the certified company. No indicators for this subject are included in the German FSC standard.

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

4 Audit findings

CAB AUDIT PERFORMANCE	
FSC requirements	Findings and conclusions
Standard adaptation (20-003)	IMO used the FSC accredited forest management standard for Germany. Therefore, a local adaptation process was not required.
Auditor qualification (20-004)	No formal auditor records were checked during the audit but the observations made on the audit quality indicate a high level of experience, professional knowledge and behaviour. Apart from minor omissions (s. company evaluation) IMO auditor carried out the audit with much oversight and knowledge of the forest management practices and the respective standard requirements.
Stakeholder consultation (20-006)	The consultation carried out by ASI revealed some weaknesses of the IMO procedures. Some important stakeholders, as the 'Ökologischer Jagdverband' and 'Arbeitsgemeinschaft Naturgemäße Waldwirtschaft' were not included

	<p>on the list of stakeholders contacted by IMO. Later, particularly these stakeholders criticised the certificate holder and the certification body for weaknesses of management or audit quality, respectively.</p> <p>The controversies were and still are most pronounced with one stakeholder who repeatedly challenged the performance of the company and of IMO. The correspondence between this stakeholder and IMO was analysed. It is concluded that the way the concerns are addressed by IMO is not appropriate to settle the conflict. The issues brought forward were not replied and there was apparently no attempt to discuss the issues with this stakeholder directly.</p> <p>CAR.IMO.FM.2007.01; REC.IMO.FM.2007.01</p>
Evaluation process (20-007; ISO 19011)	<p>The evaluation was carried out according to the requirements as set in FSC-STD-20-007. Evaluation intensity and the sites visited were appropriate to assess compliance of the company with the previously raised corrective action requests. The audit focused on the areas which were previously identified as critical and on current and recently finalised harvesting operations.</p>
Audit report (20-008)	<p>The certificate was issued in 2000. The current report was therefore not written according to the new FSC requirements of 2004. Analysis of the IMO report therefore was not be done on the basis of this certificate and should be carried out in one of the next ASI surveillance audits</p>
Public summary (20-009)	<p>The content of the public report for the year 2006 was analysed. Deficits could be identified for the points:</p> <ul style="list-style-type: none"> <input type="checkbox"/> summary of the management plan, <input type="checkbox"/> summary of the certificate holder's monitoring procedures <p>CAR.IMO.FM.2007.04</p>
Decision making (20-002, Part 2)	<p>The IMO procedure for classifying, wording and setting deadlines for corrective action requests shows some weaknesses in relation to FSC requirements.</p> <p>At least for one instance (4/04 on management planning) deadline for full compliance was prolonged without changing the classification of the CAR.</p> <p>The CARs are worded in a way which does not necessarily lead to compliance with the related requirement of the standard. Often the measures to be undertaken by the certified company are described in much detail without clear reference to</p>

	<p>the performance level required by the indicators in the standard. The changes required by IMO in the company's management system do not necessarily lead to compliance with the respective indicators of the standard. Examples can be found in the CAR 5/04 on hunting intensities, 1/04 related to safety issues or 2/06. The requirement in the CAR 5/04 to increase monitoring of game damage will not lead to compliance with the indicator of the German FSC standard in the near future which requires a defined population density. When IMO requires e.g. the introduction of a license for chainsaws from small scale fuel wood collectors this, although meaningful, does not necessarily lead to full compliance with health and safety issues and is not required as such by the German standard.</p> <p>Moreover, this concept in wording the CARs may lead to a potential conflict of interest as the detailed proposals are of consultative nature. CAR.IMO.FM.2007.02</p>
Application of FSC policies and guidelines	<p>It turned out during the audit that the owner of the certified forest the 'Bundesland Saarland' is also joint owner in different so-called 'Gehöferschaften'. The issue partial certification was not evaluated by IMO for this case. CAR.IMO.FM.2007.03</p>

5 Nonconformities and observations

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

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.

6 Conclusion and recommendation

IMO conducted a systematic and professional audit and addressed all issues in a professional manner.

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

7 Evaluation of stakeholder comments to the area of community Wadern-Wädriil

Due to a number of stakeholder comments the forests of the community Wadern-Wädriil which are certified under a group certificate managed by SaarforstLandesbetrieb were visited.

The received stakeholder comments mainly complained about game damage caused by red deer which occurs in too high densities and is not efficiently controlled through appropriate measures. In addition, it was stated that feeding of red deer aggravates the situation.

The affected forests of the community (ca.40 ha) are part of a larger area which is so called 'red-deer area' and where red deer populations are tolerated. This area includes neighbouring areas which are certified under the SaarforstLandesbetrieb certificate but also in the Bundesland Rheinland-Pfalz which is next to Saarland. The critical situation is mainly caused by the fact that the forests of the community are attractive for red deer due to their Southern exposition. In combination with the behaviour of red deer to form herds this leads to a high concentration and a high impact on the forests of the community.

In direct relation to deer management, the German FSC standard does not consider the damages from peeling off the bark ('Schältschäden') but only the impact on natural regeneration. The whole forest is composed of older spruce stands which are dissolving due to storm and beetle damage. In this situation the natural regeneration would most likely be spruce again in mixture with birch. Areas fenced in after the storms in 1990 where partly replanted with oak and can now be classified as young forest stands. On other areas, so far unfenced, regeneration is existent but is composed mainly of spruce (birch is reduced through game impact).

The feeding machines were inspected. There was no indication that these are accessible for red deer. The amount of corn distributed by the machines is controlled; the containers are closed by a lock. However, this should be analysed more thoroughly by an independent expert for red deer, which would fall under the responsibility of IMO.

Although the situation is complex and different factors add up to the overall impact the following conclusions can be drawn:

- The game impact in the area is high presumably due to low hunting intensities in the neighbouring areas, the attractive habitats in the forests of the community and probably also due to insufficient hunting intensity on the area itself. Whether feeding aggravates the situation should be analysed in more detail. The damages from peeling off the bark are (currently) outside the scope of the German FSC standard.
- The reaction of IMO is so far inadequate to resolve the problem and not in line with the requirements of the German FSC standard. IMO should therefore

analyse the situation in line with the legal requirements and the German FSC standard, identify the non-compliances and raise appropriate corrective action requests. These aspects are covered under CAR.FM.IMO.2007.2 in this report.

- A more proactive approach from the part of IMO should be sought for the consultation with the stakeholders. Again this is requested by the CAR.FM.IMO.2007.1.

Attachments

Nonconformity reports (NCRs)

Annex 1

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	CAR.IMO.FM.2007.01	Date	10 th September 2007	
Nonconformity detected by (name of auditor)		Dr Martin Walter		
Through (e.g. office audit, document review)		FM assessment		
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION	
Deficits in implementation of procedures for stakeholder consultation: <ul style="list-style-type: none"> ○ <i>In the list of stakeholders prepared by IMO some important NGOs are not included as e.g. the 'Ökologischer Jagdverband' and 'Arbeitsgemeinschaft Naturgemäße Waldwirtschaft'.</i> 				
Normative Reference(s)		FSC-STD 20-006, 3.1, FSC-STD 20-006, 3.3.1, FSC-STD 20-007, 4.3.3.1 b) und c)		
Corrective Action Request: IMO 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.				
Timeline for implementation		Next IMO office audit		
Corrective Action implemented by Certification Body <i>IMO developed a "Master" Stakeholder list for audits in Germany which is adapted on a project to project basis. The missing organizations are now included. The use of the master list is mandatory (Chapter 5.4.1.5).</i>				
Corrective Action evaluated by ASI <i>ASI is convinced that this list is sufficient to avoid recurrence of the problem.</i>				
<input checked="" type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*		Name auditor:	Achim Droste	Date: 26/06/08
Comments:				

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	CAR.IMO.FM.2007.02	Date	10th September 2007	
Nonconformity detected by (name of auditor)		Dr Martin Walter		
Through (e.g. office audit, document review)		FM assessment		
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION		
<i>Procedure for wording of corrective action requests not appropriate to achieve full compliance with the standard.</i> <i>Proposed measures are of consultative nature.</i> <i>Undue prolongation of set deadlines.</i>				
Normative Reference(s)	FSC-STD-20-002, Clause 8			
Corrective Action Request: IMO 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.				
Timeline for implementation		Next IMO office audit		
Corrective Action implemented by Certification Body				
<i>CARs cannot be extended any more as long as not fully adhered to (see IMO Work Flow Chapter 5.3)</i>				
Corrective Action evaluated by ASI				
<i>ASI is convinced that the measures taken are sufficient to avoid recurrence of the problem.</i>				
X CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:	Achim Droste	Date:	26/06/08
Comments:				

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	CAR.IMO.FM.2007.03	Date	10th September 2007	
Nonconformity detected by (name of auditor)		Dr Martin Walter		
Through (e.g. office audit, document review)		FM assessment		
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION		
<i>The certificate holder is joint owner of forest areas which are not certified. This ownership has so far not been evaluated according to the respective FSC requirements for partial certification.</i>				
Normative Reference(s)	FSC-POL-20-002, Annex 1, 2.3			
Corrective Action Request: IMO 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.				
Timeline for implementation		Next audit to certificate holder		
Corrective Action implemented by Certification Body <i>The 2008 surveillance audit for this certificate holder is still pending.</i>				
Corrective Action evaluated by ASI <i>Deadline extended to 3 months following the 2008 IMO surveillance.</i>				
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input checked="" type="checkbox"/> OTHER DECISION*	Name auditor:		Date:	
Comments: <i>Deadline extended to 3 months following the 2008 IMO surveillance</i>				

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	CAR.IMO.FM.2007.04	Date	10th September 2007
Nonconformity detected by (name of auditor)	Dr Martin Walter		
Through (e.g. office audit, document review)	FM assessment		
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION	
<i>The public report for the year 2006 lacks information on the following issues:</i> <ul style="list-style-type: none">○ <i>summary of the management plan,</i>○ <i>summary of the certificate holder's monitoring procedures</i>			
Normative Reference(s)	FSC-STD-20-009, Box 1, 1.3 and 1.4		
Corrective Action Request: IMO 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.			
Timeline for implementation	Next IMO office audit		
Corrective Action implemented by Certification Body			
<i>The 2006 report is a re-accreditation report that presents the information in a simplified way. The report however refers to the initial audit report that does include the required information. The initial audit reports are available on the IMO website.</i>			
Corrective Action evaluated by ASI			
<i>Formally the CAR can be closed; a new recommendation is issued (see 2008 office audit report).</i>			
<input checked="" type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:	Achim Droste	Date: 26/06/08
Comments:			

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	CAR.IMO.FM.2007.05	Date	10th September 2007	
Nonconformity detected by (name of auditor)		Dr Martin Walter		
Through (e.g. office audit, document review)		FM assessment		
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION	
<i>Hunting intensity and game damage are critical. Evidence indicates a decrease in hunting pressure for which repeatedly the workload of operational personnel was made responsible. IMO did not react consistently and efficiently to address this issue.</i>				
Normative Reference(s)		German FSC Standard Indicator 6.3.a3		
Corrective Action Request: IMO 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.				
Timeline for implementation		Next IMO office audit		
Corrective Action implemented by Certification Body <i>The 2008 surveillance audit for this certificate holder is still pending. IMO issued a CAR in the 2007 audit against the certificate holder for this issue</i>				
Corrective Action evaluated by ASI <i>Deadline extended to 3 months following the 2008 IMO surveillance.</i>				
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input checked="" type="checkbox"/> OTHER DECISION*		Name auditor:		Date:
Comments: <i>Deadline extended to 3 months following the 2008 IMO surveillance</i>				

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	REC.IMO.FM.2007.01	Date	10th September 2007
Nonconformity detected by (name of auditor)	Dr Martin Walter		
Through (e.g. office audit, document review)	FM assessment		
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> OBSERVATION	
<i>IMO should record the exact names of the persons contacted and interviewed in the stakeholder consultation process to enable easier follow-up in subsequent audits.</i>			
Normative Reference(s)			
Comments:			