

ASI-ACCREDITATION SERVICES INTERNATIONAL GmbH

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FSC Annual Surveillance of Soil Association Woodmark Programme for 2007

Forest Management Audit to Dospat Forest Management Unit,
Bulgaria (BGR)

(SA-FM/COC-1497)

Date of audit: 08-09 October 2007

Public Summary

| | NAME | DATE |
|----------------------|-----------------------------------|------------------|
| Report drafted by: | Guntars Laguns Zhivko Bogdanov | 17 October 2007 |
| Reviewed by ASI: | Paolo Tranquillini | 17 October 2007 |
| Reviewed by CB: | SA | 28 November 2007 |
| Finalized by ASI: | Guntars Laguns | 16 January 2008 |
| Report last updated: | | |

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1 Background

The operation audited by SA

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|-------------------------------|--|
| Name of operation | Dospat Forest Management Unit (Dospat FMU) |
| Total area | 19 429 ha |
| Type of management | Semi natural |
| Name of contact person | Vergil Baikalov, Director |
| Address | 6, Orphei Str., 4831 Dospat |
| Country | Bulgaria |
| Phone number | +359 3045 2223 |
| E-mail address | dldospat@nug.bg |

Brief description of the company

Please see SA public report on SA website.

The certification history

| | |
|--|----------------------------|
| Main assessment: | 14-16/11/2005 |
| Date of certificate re-issue | 23/01/2006 |
| Date of 1st surveillance | 10-11/10/ 2006 |
| Date of 2nd surveillance | 08-09/10/2007 (this audit) |

ASI Audit Details

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|-----------------------------------|---------------------------------|
| Purpose of audit | Annual SA FM surveillance audit |
| ASI lead auditor | Guntars Laguns |
| Local Expert / ASI auditor | Zhivko Bogdanov |
| Audit language | Bulgarian, English |

Audit agenda

| | |
|----------------------------|---|
| 7 October (Sunday) | |
| PM | ASI meeting with SA team |
| 8 October (Monday) | |
| AM | Opening meeting, SA and company |
| | Forest sites visit |
| | Follow up on previously raised CARs, document reviews, interviews with stakeholders |
| PM | |
| 9 October (Tuesday) | |
| AM | Site visits |
| | Document review |
| PM | Document review |
| | SA and company closing meeting |
| | ASI and SA closing meeting |

People involved and met during the audit

| | |
|------------------|--|
| CB | Oliviu Iorgu - lead auditor Stanislav Lazarov – local expert / auditor Dobromira Dimova – local expert |
| Operation | Company staff members |
| Others | NA |

Main documents and records reviewed

| | |
|----------------------------|--|
| CB documents | SA standard Reports for main assessment, surveillance and Major CAR closure |
| Company's documents | Different management planning, operational and monitoring documents |
| Other documents | National regulations and different stakeholders' provided documents |

2 Audit objectives and planning

The objectives of this forest management surveillance audit 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 audits are conducted as "*witness audits*". The number of audits 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 audit findings.

3 ASI stakeholder consultation process

The ASI stakeholder consultation process consists of 2 parts:

1. public announcement of the audit on the FSC electronic fora and on the ASI website prior to the audit to solicit stakeholder comments;
2. direct interviews with selected key-stakeholders mainly conducted by the contracted local expert prior, during and after the audit.

Summary of main concerns expressed by stakeholders

| Stakeholder Comments | ASI response |
|---|---|
| <p>Conflict of interests: SA local Bulgarian Inspectors and their relationship with Bulgarian Forestry Agency is against the Forest Law/ formerly National Forestry Board</p> | <p>The local auditor of SA for this assessment is Mr. Stanislav Lazarov, PhD Forestry. His work and job doesn't relate to the state forestry sector as he works as Agriculture Coordinator in the GTZ Project "Promotion of Agro and Forestry Structures in the Rhodopes". The Project is by German Embassy in Bulgaria and is oriented to support non-state entities and structures in the Rhodope Mountain range region. Mr. Lazarov is working in this project since 2002 and before that 3 years in the Forestry University, Sofia as PhD student in Forest management and Silviculture Department.</p> <p>Mrs. Dobromira Dimova – the facilitator and local expert used by SA is now working as deputy director of Vitosha Nature Park, which is under the National Forestry Board. The responsibility of Nature Park Directorates links to plan, organize and control the implementation of the activities according to the Management Plans of the related Nature Parks which include development and monitoring of conservation and tourism activities and control whether the forest management activities on the territory are according to the goals of the particular Nature Park Plans. The Forest Management activities on the Nature parks territories are under the local State Forest Management Units operated on the same territory. The power and responsibilities of the Nature Park Directorates are limited according to their territories. They may not influence the</p> |

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| | <p>practices in other regions. Additionally as state administration the Nature Park staff have to respect the “Code for the conduct of the employees in the state administration” (State Gazette #53/22.06.2004), Chapter 4 – Conflict of Interests. The regulation mentioned above is corresponding also to the “Governmental Officer Act” (State Gazette #53/22.06.2004), §1.</p> |
| <p>Can SA provide evidence that the management of Dospat State Forest Unit has paid in full overtime to the all staff involved in weekend work / such as Hunt Supervising / an how it was arranged.</p> | <p>During the audit ASI audit team specifically checked the contracts between the employees and the FMU, the collective agreement in the forestry sector between forestry staff workers union and national Forestry Board and the collective agreement between the staff and the management of Dospat FMU. All the practices are in correspondence with the Labour Codex, with the contracts, with the collective agreements and the relative legislation in the country. The FMU has been audited in 2007 by the National Insurance Institute – the responsible authority for the labour and social insurance in the country. Anything related to the issue findings has been mentioned in the protocol of this revision by the state auditors.</p> |
| <p>Excision and restitution of forest lands</p> | <p>The company has a court case in regards to the restitution of part of their managed forests. The subject of the dispute is related to the ownership rights, when during the restitution process some private persons claimed private ownership of part of state forests. At the beginning (2001) the lands was given to private ownership, but then this decision was appealed by local community considering that these forests are state forests and should not be given to private persons. The disputable area is 124.35 ha. ASI audit team does not consider this dispute as substantial magnitude. More, the latest court decisions are positive in regards that these areas are state owned lands. These decisions possibly are going to be appealed. Dospat FMU does not carry any management activities on these lands.</p> |
| <p>Corruption in Bulgaria State Forest Service system</p> | <p>The issue related to the corruption in Bulgarian forestry sector in general, raised by the stakeholders comments, are based by findings from the WWF DCP report “The Level of the Illegal Logging in Bulgaria, 2005” and the personal experience of the particular stakeholder in one part of the country. Based</p> |

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| | on the observations, consultations with local stakeholders and findings during the assessment, ASI audit team does not consider that the issue with corruption in forestry sector in Bulgaria is applicable to the management of Dospat FMU. |
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4 Audit findings related to CB performance

4.1 Structure and content of CB standard and its application

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| CB audit team in compliance with FSC-STD-20-002 | <p>SA Woodmark Draft Standard and Checklist for Bulgaria, version 2, 03.10.2007, was reviewed.</p> <p>The locally adapted generic standard does not comply with all applicable approved FSC International Policies, Standards and Advice Notes, .e.g. FSC Criterion 4.4. During the 2002 General Assembly a motion was passed to add gender equality to Criterion 4.4, which is now reflected in the new criterion wording "<i>both men and women</i>". CB has to use new wording of Criterion 4.4 and consider gender equality in the indicators. If in indicator.4.4.3 gender equality is addressed, then wording of the Criterion are not changed.</p> <p>ASI proposes REC.SA.FM.BGR.2007.1</p> |
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4.2 Local adaptation of CB standard

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| CB audit team in compliance with FSC-STD-20-003 | <p>SA Woodmark Draft Standard and Checklist for Bulgaria, version 2, 03.10.2007, was reviewed against applicable standard requirements.</p> <p>SA has published the adopted standard on its website, however, it is available only in English and not in an official language of the district in which it is to be used.</p> <p>ASI proposes CAR.SA.FM.BGR.2007.01 (FSC-STD-20-003, part 4.7)</p> |
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4.3 Audit team

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| CB audit team in compliance with FSC-STD-20-004 AND ISO 19011 | <p>Auditors' qualification and performance was evaluated against FSC and ISO19011: 2002 (E) Guidelines for quality and/or environmental management systems auditing.</p> <p>During the audit it was evident that SA auditors Stanislav Lazarov and local expert Dobromira Dimova have provided training for Dospat FMU on 23 November 2006. Although the training course was provided within the framework of UNDP project "Rodopi", it was evident that training was specifically provided for the certified enterprise. ASI assessor considers that such activities indicates possibility of conflict of interest of SA auditors since training</p> |
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| | <p>(lectures) and certification evaluation is done by same persons. However, FSC accreditation requirements (FSC Guidelines for Certification Bodies Part 1: Accreditation, Subject 1.3: Consultancy Services) allows providing consultancy by FSC accredited CBs.</p> <p>ASI recommends for SA to review its conflict of interest procedure to ensure that that SA auditors or experts before job assignment clearly state what activities they have carried out in related enterprise. This will give possibility for SA to evaluate information provided by potential auditors or experts to decide what kind of activities he/ she may carry to avoid any potential COI and to demonstrate SA impartiality in certification process.</p> <p>ASI proposes REC.SA.FM.BGR.2007.04</p> |
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4.4 Pre-evaluation

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| CB audit team in compliance with FSC-STD-20-005 | NA |
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4.5 Stakeholder consultation process

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| Compliance with FSC-STD-20-006 | <p>Although there are no FSC requirements for CBs to perform stakeholder consultation before a surveillance audit, SA performed appropriate stakeholder consultation before this surveillance audit.</p> <p>No non-conformity identified.</p> |
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4.6 FM evaluation

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| CB audit team in compliance with FSC-STD-20-007 | <p>During the audit SA audit team visited 5-6 sites for field assessment. Although, SA audit conclusions on the certified operation compliance with the audit criteria is considered as appropriate, it is recommendation for SA to consider increasing amount and variety of the field audits in future surveillance visits to ensure more fundamental collection of audit evidence and company field performance.</p> <p>ASI proposes REC.SA.FM.BGR.2007.02</p> <p>No non-compliance with FSC accreditation standards identified.</p> |
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4.7 The certification reports (main report and public summary)

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| CB audit team in compliance with FSC-STD-20-008 and FSC-STD-20- | <p>ASI assessors evaluated SA audit report for Dospat, including main assessment, surveillance and Major CAR evaluation reports.</p> <p>The report is published on SA website and complies with FSC</p> |
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| <p>009</p> | <p>requirements for publicly available audit information.</p> <p>FSC standards claims that in cases where one or more stakeholders have alleged a non-compliance, but the auditors have concluded that a certificate should be issued, the report shall explain why the auditors concluded there was no non-compliance, or why the alleged non-compliance was considered minor, or what action was taken to correct the non-compliance prior to the issue of a certificate. ASI auditor during the report review did not find any evidence that SA has addressed stakeholder comments mainly related to illegal logging and compliance with national legislation (working condition and corruption).</p> <p>ASI proposes CAR.SA.FM.BGR.2007.02 (FSC-STD-20-008, part 5, Box 1)</p> <p>In the report there are two names used for the company – Dospat Forest Management Unit (also used on certificate) and DOSPAT State Forestry. SA should clarify the company names and use only one name for certified operation in the report.</p> <p>ASI proposes REC.SA.FM.BGR.2007.03</p> |
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4.8 Certification recommendation and decision making

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| <p>CB audit team in compliance with FSC-STD-20-002, part 2 and 8; FSC-STD-20-007, part 1, and FSC-STD-20-001.</p> | <p>CAR 2005.11, regarding the waste management, was identified during the main assessment then during the 1st surveillance upgraded to Major CAR, then downgraded to a Minor CAR. During this audit it was evident that there is still non-compliance with the waste management in FMU.</p> <p>After this audit, SA auditors proposed a suspension of certificate. ASI audit team considers SA decision was appropriate and is in line with FSC requirements.</p> <p>During the report review it appears that some of the CARs were closed during the 1st surveillance, although they were only partially met. In the SA report part “Basic Information”, section “Conditions closed” it is stated that SA closed 4 conditions and 3 conditions were partly closed and rewritten. It is not appropriate to close CARs which are not fully met and raise new ones, instead of upgrading CARs, to ensure implementation of requested actions to correct non-compliance.</p> <p>The following is taken from FSC standard requirements in FSC-STD-20-002:</p> <p><i>„A non-compliance shall be considered major if, either alone or in combination with further non-compliances of other indicators, it results in, or is likely to result in a fundamental failure to achieve the objectives of the relevant FSC Criterion in the Forest Management</i></p> |
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| | <p><i>Unit(s) within the scope of the evaluation.</i></p> <p><i>Such fundamental failure shall be indicated by non-compliance(s) which:</i></p> <ul style="list-style-type: none"> • <i>are not corrected or adequately responded to by the forest managers once they have been identified.“</i> <p>SA documented procedures set requirements for conditions to be fully met, see part 1.2.6 from GM-FM-001. The SA inspector manual clearly states that if: „<i>Conditions are not met in full then a series of steps is taken culminating in suspension and subsequent withdrawal of the certificate. If a Condition is not met it is upgraded to become a ‘Final Condition’.</i>”</p> <p>ASI audit team considers that SA auditors have not appropriately implemented FSC and SA requirements and thus did not ensure that certificate holder complies with relevant FSC standard requirements.</p> <p>ASI proposes CAR.SA.FM.BGR.2007.03 (FSC-STD-20-008, part 8, SA GM-FM-001, part 1.2.6.)</p> <p>During the closing meeting, SA auditors proposed two new CARs, which apparently resulted from previous CAR. It was not clear what happens with this CAR from last audit, since requested corrective actions were not fully implemented and non-compliance was evident. This issue was discussed with the SA audit team during the closing meeting, to ensure that no closure of partly met CAR is carried out after this audit and SA audit team follows FSC and SA procedures in terms of addressing non-compliances.</p> |
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5 CB evaluation of certificate holder’s compliance.

5.1 Principle 1

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| Certificate holder compliance with FSC Principle 1 | At the time of the ASI audit, the SA audit team had adequately evaluated compliance with FSC Principle 1 and no nonconformity on Criterion level was identified. |
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5.2 Principle 2

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| Certificate holder compliance with FSC Principle 2 | The company has a court case in regards to the restitution of part of their managed forests. The subject of the dispute is related to the ownership rights, when during the restitution process some private persons claimed private ownership of part of state forests. At the beginning (2001) the lands was given to private ownership, but then this decision was appealed by local community considering that these forests are state forests and should not be given to private persons. The disputable are is 124.35 ha. ASI audit team does not consider this dispute as substantial magnitude. More, the latest |
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| | <p>court decisions are positive in regards that these areas are state owned lands. These decisions possibly are going to be appealed. Dospat FMU does not carry any management activities on these lands.</p> <p>At the time of the ASI audit, the SA audit team had adequately evaluated compliance with FSC Principle 2?? and no nonconformity was identified.</p> |
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5.3 Principle 3

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| <p>Certificate holder compliance with FSC Principle 3</p> | <p>At the time of the ASI audit, the SA audit team had adequately evaluated compliance with FSC Principle 3 and no nonconformity on Criterion level was identified.</p> |
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5.4 Principle 4

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| <p>Certificate holder compliance with FSC Principle 4</p> | <p>During the audit there was evidence of non-compliance with Health and Safety requirements, mainly related to personal protective equipment (lack of safety trousers, visor, ear protection). In one active harvesting site case, workers left already harvested tree hanging in other tree. It was also evident that qualification of workers in terms of harvesting skills was not sufficient.</p> <p>There was no evidence that certified operation performed harvesters' control to ensure compliance with H&S requirements.</p> <p>This was already identified by SA audit team on main assessment with CAR 2005.2, which was closed on 1st surveillance, with new recommendation raised to develop standardized forms for registering H&S observations. Such forms have been developed, however, not systematically implemented.</p> <p>During the closing meeting SA raised two new CARs addressing lack of PPE and first aid kit.</p> <p>ASI audit team reviewed company documents of the site, where non-compliance with the H&S requirements were evident and it appears that company has not implemented their own procedures in regards to control of forest workers compliance with H&S requirements (no checklist for H&S control was filled on for active harvesting operation) or otherwise the elaborated operational procedures are not appropriate, since this does not ensure compliance with company FSC H&S requirements. This aspect was not considered by SA auditors during the closing meeting.</p> <p>ASI proposes CAR.SA.FM.BGR.2007.04 (ILO Code of Practise; Health and Safety in Forestry Works, FSC Criterion 4.2)</p> |
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5.5 Principle 5

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| <p>Certificate holder</p> | <p>At the time of the ASI audit, the SA audit team had adequately</p> |
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| compliance with FSC Principle 5 | evaluated compliance with FSC Principle 5 and no nonconformity on Criterion level was identified. |
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5.6 Principle 6

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| Certificate holder compliance with FSC Principle 6 | <p>SA has identified a number of issues and raised CARs for company to implement measures for biodiversity protection and HCVF management (e.g. 2006.4, 2006.5, 2006.6, 2006.7, 2006.8, 2006.9, 2006.10, and 2006.11), including development of written procedures and implementation of these procedures. During this audit, it was apparent that some of those procedures, e.g related to water protection, are not implemented and thus appropriate protection of biodiversity values are not ensured.</p> <p>During the closing meeting SA presented several new CARs, while some of the last year CARs were upgraded to Major. ASI audit team considers that SA audit team has appropriately addressed identified non-compliances.</p> |
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5.7 Principle 7

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| Certificate holder compliance with FSC Principle 7 | <p>In general forest management planning documents complies with FSC requirements.</p> <p>However, the implementation evidence of the FMP in many cases is missing, as for example, biodiversity and H&S control procedures.</p> <p>SA has already identified in previous surveillance implementation of procedures as non-compliance and raised CARs. Some of them during the closing meeting were upgraded to Major level and new CARs requesting implementation of certain aspects were raised, thus ASI audit team considers that Principle 7 was appropriately evaluated by SA audit team.</p> |
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5.8 Principle 8

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| Certificate holder compliance with FSC Principle 8 | <p>At the time of the ASI audit, the SA audit team had adequately evaluated compliance with FSC Principle 7 and no nonconformity on Criterion level was identified.</p> <p>There is no evidence that a monitoring summary is publicly available. SA report states that a summary of monitoring activities will be included in the SA public summary of evaluation. It is not acceptable for FSC accredited CB to undertake work to enable certified company's to meet the relevant standard requirements.</p> <p>ASI proposes CAR.SA.FM.BGR.2007.05 (FSC P&C, Criterion 8.5)</p> |
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5.9 Principle 9

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| Certificate holder compliance with FSC Principle 9 | At the time of the ASI audit, the SA audit team had adequately evaluated compliance with FSC Principle 9 and no nonconformity on Criterion level was identified. |
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5.10 Principle 10

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| Certificate holder compliance with FSC Principle 10 | NA |
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5.11 Chain of custody

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| Certificate holder compliance with FSC chain of custody requirements | No certified wood sales are carried out by certified operation. No non-compliance identified. |
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5.12 FSC trademark use

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| Certificate holder compliance with FSC trademark use requirements | <p>Company uses a stamp, which included FSC logo. No trademark statements included there. Also, in several occasions it was apparent that company uses FSC trademark which is in no compliance with FSC requirements.</p> <p>Also, the FSC code issued by SA is used incorrectly, since SA issued code is SA-FM/COC-1497, but on company documents is used code SM-FM/COC-1497.</p> <p>SA has raised two CARs to address non-compliance.</p> |
|--|--|

Summary of nonconformities and observations resulting from this audit

| Major CAR(s) | Minor CAR(s) | Observations |
|--------------|--------------|--------------|
| None | 5 | 4 |

Conclusion and recommendation

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

Credits

The author would like to thank Soil Association Woodmark and Dospat FMU staff for their cooperation and help in organizing this ASI surveillance forest management audit.

Other

All information in this report is confidential and may not be disclosed to third parties, with the exception of the information which is to be included in the FSC Audit Public Summary Report.

Terms and definitions

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 applicant body. ASI procedures for nonconformity and corrective action requests are included in ASI QMS, procedure ASI-PRO-20-116 Corrective action procedure.

Note:

A “nonconformance” is a product that does not meet specifications;

A “nonconformity” is a process that does not meet specifications.

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

Major Nonconformity - CAR

“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 reference standards can represent a total breakdown of the system and thus be considered a major nonconformity.”

Minor Nonconformity – CAR

“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 non-conformance shall be issued."

Observation or recommendation - REC ¹

"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."

Attachments

Nonconformity reports (NCRs)

¹ **Note:** 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 be upgraded to conditions in the following audit.

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

| | | | |
|--|--------------------------------------|--|------------------------|
| REF. No. | REC.SA.FM.BGR.2007.01 | Date | 09 October 2007 |
| Nonconformity detected by (name of auditor) | Guntars Laguns | | |
| Through (e.g. office audit, document review) | SA FM surveillance Audit 2007 | | |
| Observation | Status | <input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> OBSERVATION | |
| <p>During the 2002 General Assembly a motion was passed to add gender equality to Criterion 4.4, which is now reflected in the new criterion wording "<i>both men and women</i>". CB has to use new wording of Criterion 4.4 and consider gender equality in the indicators. If in indicator.4.4.3 gender equality is addressed, then wording of the Criterion are not changed</p> | | | |
| Normative Reference(s) | NA | | |
| Comments: | | | |

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

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|---|------------------------------|--|------------------------|
| REF. No. | REC.SA.FM.BGR.2007.02 | Date | 09 October 2007 |
| Nonconformity detected by (name of auditor) | | Guntars Laguns | |
| Through (e.g. office audit, document review) | | SA FM surveillance Audit 2007 | |
| Observation | Status | <input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> OBSERVATION | |
| <p>During the audit SA audit team visited 5-6 sites for field assessment. Although, SA audit conclusions on the certified operation compliance with the audit criteria is considered as appropriate, it is recommendation for SA to consider increasing amount and variety of the field audits in future surveillance visits to ensure more fundamental collection of audit evidence and company field performance.</p> | | | |
| Normative Reference(s) | NA | | |
| Comments: | | | |

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| | | | |
|---|------------------------------|--|------------------------|
| REF. No. | REC.SA.FM.BGR.2007.03 | Date | 09 October 2007 |
| Nonconformity detected by (name of auditor) | | Guntars Laguns | |
| Through (e.g. office audit, document review) | | SA FM surveillance Audit 2007 | |
| Observation | Status | <input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> OBSERVATION | |
| <p>In the report, two names are used for the certified company– Dospat Forest Management Unit (also used on certificate) and DOSPAT State Forestry. SA should clarify the company names, and use only one name for certified operation in the report.</p> | | | |
| Normative Reference(s) | NA | | |
| Comments: | | | |

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

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|--|--------------------------------------|--|------------------------|
| REF. No. | REC.SA.FM.BGR.2007.04 | Date | 09 October 2007 |
| Nonconformity detected by (name of auditor) | Guntars Laguns | | |
| Through (e.g. office audit, document review) | SA FM surveillance Audit 2007 | | |
| Observation | Status | <input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> OBSERVATION | |
| <p>ASI recommends for SA to review its conflict of interest procedure to ensure that SA auditors and experts always disclose all information about activities carried out in certified enterprise.</p> | | | |
| Normative Reference(s) | NA | | |
| Comments: | | | |

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NONCONFORMITY / CORRECTIVE ACTION REQUEST

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|---|---------------------------------|--|--------------------------|--|--|
| REF. No. | CAR.SA.FM.BGR.2007.01 | Date | 09 October 2007 | | |
| Nonconformity detected by (name of auditor) | | Guntars Laguns | | | |
| Through (e.g. office audit, document review) | | SA FM surveillance Audit 2007 | | | |
| Nonconformity | Status | <input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION | | | |
| SA has published the adopted standard on its website. However, this is available only in English and not in an official language of the district in which it is to be used. | | | | | |
| Normative Reference(s) | FSC-STD-20-003, part 4.7 | | | | |
| Corrective Action Request: CB 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 office audit | | |
| Corrective Action implemented by Certification Body | | | | | |
| SA: 23.11.07 The translated version of the Bulgarian adapted standard is currently being updated and will be posted on the Website as soon as this is completed. | | | | | |
| Corrective Action evaluated by ASI | | | | | |
| Here: describe conclusion in detail | | | | | |
| <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

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|--|------------------------------|--------------------------------------|--|-------|--|
| REF. No. | CAR.SA.FM.BGR.2007.02 | Date | 09 October 2007 | | |
| Nonconformity detected by (name of auditor) | | Guntars Laguns | | | |
| Through (e.g. office audit, document review) | | SA FM surveillance Audit 2007 | | | |
| Nonconformity | | Status | <input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION | | |
| <p>FSC standards claims that in cases where one or more stakeholders have alleged a non-compliance, but the auditors have concluded that a certificate should be issued, the report shall explain why the auditors concluded there was no non-compliance, or why the alleged non-compliance was considered minor, or what action was taken to correct the non-compliance prior to the issue of a certificate. ASI auditor during the report review did not find any evidence that SA has addressed stakeholder comments mainly related to illegal logging and compliance with national legislation (working condition and corruption).</p> | | | | | |
| Normative Reference(s) | | FSC-STD-20-008, part 5, Box 1 | | | |
| <p>Corrective Action Request: CB 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.</p> | | | | | |
| Timeline for implementation | | | Next office audit | | |
| Corrective Action implemented by Certification Body | | | | | |
| Here: describe action taken in detail | | | | | |
| Corrective Action evaluated by ASI | | | | | |
| Here: describe conclusion in detail | | | | | |
| <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

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|--|--|--|------------------------|--|
| REF. No. | CAR.SA.FM.BGR.2007.03 | Date | 09 October 2007 | |
| Nonconformity detected by (name of auditor) | | Guntars Laguns | | |
| Through (e.g. office audit, document review) | | SA FM surveillance Audit 2007 | | |
| Nonconformity | Status | <input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION | | |
| <p>During the report review it appears that some of the CARs were closed during the 1st surveillance, although they were only partially met. In the SA report part "Basic Information", section "Conditions closed" it is stated that SA closed 4 conditions and 3 conditions were partly closed and rewritten. It is not appropriate to close CARs which are not fully met and raise new ones, instead of upgrading CARs, to ensure implementation of requested actions to correct non-compliance.</p> <p>ASI audit team considers that SA auditors have not appropriately implemented FSC and SA requirements and thus did not ensure that certificate holder complies with relevant FSC standard requirements.</p> | | | | |
| Normative Reference(s) | FSC-STD-20-008, part 8, SA GM-FM-001, part 1.2.6. | | | |
| Corrective Action Request: CB 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 office audit | | |
| Corrective Action implemented by Certification Body | | | | |
| This refers to past reports. Woodmark had already picked up on this issue. We have now updated our systems and issued further guidance to auditors to ensure that this no longer happens (Woodmark Technical Update issued on 2 May 2007). Conditions are now separated out into easily auditable components so that it is clear at each audit whether each individual condition can be closed or not. Check the S2 2007 report for non-compliances on this issue. If none are found then remove the condition. | | | | |
| Corrective Action evaluated by ASI | | | | |
| Corrective action is accepted; however CAR is not closed until next office audit to be able to evaluate implementation of Woodmark Technical Update addressing this non-conformity. | | | | |
| <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

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|--|---|--|------------------------|
| REF. No. | CAR.SA.FM.BGR.2007.04 | Date | 09 October 2007 |
| Nonconformity detected by (name of auditor) | | Guntars Laguns | |
| Through (e.g. office audit, document review) | | SA FM surveillance Audit 2007 | |
| Nonconformity | Status | <input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION | |
| <p>During the audit there was evidence of non-compliance with Health and Safety requirements, mainly related to personal protective equipment (lack of safety trousers, visor ear protection). In one active harvesting site case workers left already harvested tree hanging in other tree. It was also evident that qualification of workers in terms of harvesting skills was not sufficient.</p> <p>ASI audit team reviewed company documents of the site, where non-compliance with the H&S requirements were evident and it appears that company has not implemented their own procedures in regards to control of forest workers compliance with H&S requirements (no checklist for H&S control was filled on for active harvesting operation) or otherwise the elaborated operational procedures are not appropriate, since this does not ensure compliance with company FSC H&S requirements. This aspect was not considered by SA auditors during the closing meeting.</p> | | | |
| Normative Reference(s) | ILO Code of Practise; Health and Safety in Forestry Works, FSC Criterion 4.2 | | |
| Corrective Action Request: CB 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 office audit | |
| Corrective Action implemented by Certification Body Here: describe action taken in detail | | | |
| Corrective Action evaluated by ASI Here: describe conclusion in detail | | | |
| <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

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| REF. No. | CAR.SA.FM.BGR.2007.05 | Date | 09 October 2007 | |
| Nonconformity detected by (name of auditor) | | Guntars Laguns | | |
| Through (e.g. office audit, document review) | | SA FM surveillance Audit 2007 | | |
| Nonconformity | Status | <input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION | | |
| There is no evidence that a monitoring summary is publicly available. SA report states that a summary of monitoring activities will be included in the SA public summary of evaluation. It is not acceptable for FSC accredited CB to undertake work to enable certified company's to meet the relevant standard requirements. | | | | |
| Normative Reference(s) | FSC P&C, Criterion 8.5 | | | |
| Corrective Action Request: CB 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 office audit | | |
| Corrective Action implemented by Certification Body | | | | |
| Here: describe action taken in detail | | | | |
| Corrective Action evaluated by ASI | | | | |
| Here: describe conclusion in detail | | | | |
| <input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION* | Name auditor: | | Date: | |
| Comments: | | | | |