

# ASI-ACCREDITATION SERVICES INTERNATIONAL GmbH

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## FSC Annual Surveillance of SGS Qualifor for 2006

Forest Management Audit to Regional Directorate of State Forest in  
Białystok, Poland (SGS-FM/COC-0428)

Date of audit: 09 – 12 May 2006

*(Public Summary)*

	NAME	DATE
Report drafted by:	Hans Joachim Droste	30 November 2006
Reviewed by ASI:	Guntars Laguns	08 December 2006
Reviewed by CAB:	Gerrit Marais, Włodzimierz Jankowski	01 February 2007
Finalized by ASI:	Hans Joachim Droste, Guntars Laguns	05 February 2007
Report last updated:	Hans Joachim Droste	28 February 2007

**SGS did not agree with all the findings and conclusions presented in this report. ASI is happy to consider any further evidence that will be submitted by SGS for closing the CARs.**

## Credits

The author would like to thank Gerrit Marais from SGS Qualifor as well as Dagmara Zygowska and Włodzimierz Jankowski from SGS Poland for preparing and making the arrangements that made this audit possible, and for providing comments on the draft report.

## 1 Background

The company audited by SGS

<b>Name of operation</b>	Regional Directorate of State Forest in Białystok
<b>Name of contact person</b>	Mr Zbigniew Godlewski
<b>Address</b>	51, Lipowa St., 15-424 Białystok
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Further details on the operation are available in the public summary report of SGS, available on the SGS website under:  
[http://www.forestry.sgs.com/forestry\\_services\\_index\\_v2/mini\\_site\\_forestry\\_certification/forest\\_management\\_reports.htm](http://www.forestry.sgs.com/forestry_services_index_v2/mini_site_forestry_certification/forest_management_reports.htm)

The certification history

<b>Re-certification audit</b>	16 – 20 May 2005
<b>Date of 1st surveillance</b>	09 – 12 May 2006 (this audit)

ASI Audit Details

<b>Date of audit</b>	09 – 12 May 2006
<b>Purpose of audit</b>	Annual FSC Surveillance Forest Management Audit following stakeholder complaints
<b>ASI audit team</b>	Hans Joachim Droste (ASI Accreditation Program Manager and lead auditor) Guntars Laguns (ASI Accreditation Program Manager and co-auditor) Dr Waldemar Gil (ASI local expert)

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Audit agenda

<b>08 May 2006</b>	
16:00 - 20:00	Arrival at Białystok from Warsaw Airport
21:00 – 22:00	Initial meeting of ASI audit team
<b>09 May 2006</b>	
09:00 – 09:15	Opening meeting
09:15 – 10:00	Presentation RDSF Białystok
10:00 – 15:00	Document review; review of CARs
15:00 – 15:30	<i>Lunch</i>
15:30 – 16:00	Review of findings
16:00 – 17:30	Transfer to Hostel
18:30 – 19:30	Debriefing meeting ASI team
<b>10 May 2006</b>	
08:30 – 09:15	Transfer to Superintendence Plaska
09:15 – 09:30	Opening meeting
09:30 – 11:00	Introduction to Superintendence; Documents and records
11:00 – 17:00	Field trips in split teams to Rangery Krolowa Woda,
17:00 – 18:00	Transfer to Hostel
18:30 – 19:30	Debriefing meeting ASI team
<b>11 May 2006</b>	
08:00 – 09:00	Transfer to Superintendence Browsk
09:00 – 09:15	Opening meeting
09:15 – 10:30	Introduction to Superintendence; Documents and records
10:30 – 18:00	Field trips in split teams to
18:00 – 19:00	Transfer to Hostel
21:00 – 22:00	Debriefing meeting ASI team
<b>12 May 2006</b>	
07:30 – 09:00	Transfer to RDSF Białystok Main Office
09:00 – 10:00	Interviews and document review
10:00 – 10:45	Closing meeting
10:45 – 11:30	ASI feedback on SGS audit
12:30	Transfer to Warsaw Airport

People involved in the audit

<b>CAB</b>	Gerrit Marais (SGS Qualifor, observer) Dagmara Zygowska (SGS Poland, observer) Włodzimierz Jankowski (SGS Lead auditor) Maria Sakowska (local forestry expert, Co-auditor)
<b>RDSF Białystok</b>	Piotr Zbrozek (Deputy Director for Forest Management) Wiesław Stankiewicz (Specialist on the subject of forest contractors) Marek Taradejna (Senior Specialist for Information) Cezary Swistak (Head of Forest Protection Department) Romuald Luto (Senior Specialist) Jan Książkowski (Superintendent Plaska) Zbigniew Naumowicz (Ranger at Krolowa Woda) Scibor Zawislak (Rangery Maly Borek)

	Eugeniusz Polkowski (Rangery Jazy) Ireneusz Wiszniewski (Rangery Maly Borek) Robert Trąbka (Superintendent Browsek) Jerzy Pańkowski (Rangery Pasieki) Anatol Bortnik (Rangery Jelonka) Władysław Radziwoniuk (Rangery Swinoroje) Eugeniusz Doroszkiewicz (Head of Resource Department)
<b>Others</b>	

## 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 based on a sample of the valid certificates of the audited CB 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. 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 stakeholder consultation process employed by ASI consists of 2 parts:

1. announcement of the audit on the FSC electronic fora about one month prior to the audit to solicit stakeholder comments;
2. direct interviews with selected key-stakeholders conducted by the contracted local expert prior and during the audit.

### LIST OF KEY-ISSUES IDENTIFIED FROM THE DIRECT INTERVIEWS

#### **Complaints**

- There are numerous objections on cutting down old oak trees (especially at the frontier zone).
- On the area of some Primeval Forests (Puszcza Augustowska and Knyszyńska Primeval Forests) there were conducted clearcuts without leaving of any fragments for natural disintegration.
- Many complaints are dealing with the clearcuts area (too large).
- Some of stakeholders say that the State Forests in forest practise do not leave groups of old trees on clearcut areas.
- the State Forests of RDSF Białystok are carrying out some kind of forest activities in nature reserves:
- hunting (even renovating infrastructure for hunters, i.e. reconstructing high seats for hunters),
- cutting down trees infected by bark beetles.
- There are also some signals of violation of birds protection zones.
- Private contractors are dishonestly treated by forest manager of public forest – Administration of State Forests. National producers are victims of monopolistic practices. Local timber customers pay much more for one stereo meter of wood than whole buyers from even remote regions.
- The SGS is not willing to make their documentation accessible for some interested groups of stakeholders.
- Some NGOs consider SGS as not objective and they complain about the fact the SGS disregards their opinion expressed in context of RDSF Białystok forest certification.
- Some NGOs are complaining on total lack of feedback with SGS. Even if they were sending its remarks on forest certification of the SF they never received back any kind of information.
- Some important groups of stakeholders (like scientists) are complaining that they are excluded by SGS from consultation process.

#### **Other remarks**

- Some NGOs believe that forest certification perform an important role because it creates opportunity for public to declare its opinion on forest management, and it makes the system more transparent and eliminates the suspicion of “mafia practices” in forestry.
- Stakeholders also feel that forest certification in Poland is organized in wrong way and it should be arranged on the level of a single forest superintendence (in their opinion some superintendences work properly) not at the level of RSDF area, which is too extensive and too differentiated.

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- In general, trade unions in RDSF Bialystok have neutral opinion on forest certification.
- Some forest professionals express their belief that certification does not influence of forest management and the forest management in Poland is conducted properly.
- Some important persons, occupying rather high positions in public administration in the field of environment or agriculture, hardly heard of certification processes in forestry and some of them have no knowledge at all on the subject.
- Spot checking, used by ecologists, should be replaced by holistic view of nature and human activity directed towards coexistence with nature and not against it.
- Some timber using companies require forest certificates from the RDSF Bialystok, because they, in turn, have customers ready to buy timber or wood based products with FSC certificate.
- There is evident lack of advertising action on forest certification in the region of RDSF Bialystok (supplying more information on this process) and generally public opinion is poorly informed on this subject.
- The conflicts between forest managers and stakeholders the most frequently apply to a vision of uniform structure and form of conservation and the Puszcza Bialowieska Primeval Forest management creating the conditions for sustainable development of region, i.e. the development based more and more on nature conservation of The Puszcza Bialowieska instead on it exploitation.
- Problems in forestry comprise, among others, bad working conditions of ZULs (forest contractors) because of low wages, poor equipment, low quality of services, limited possibility for supervision (because ZULs are employing subcontractors illegally).
- Some wasteland inside of forest should be cultivated in agricultural manner instead of being planted with forest tree species. Creating meadows among forest stands would amplify the feeding base for game animals.
- The State Forests of RDSF Bialystok should be informed in advance that it might be a strong demand on tree seedlings necessary for planting on post agricultural lands in the scope of UE granted funds for afforestation of those terrains.

The stakeholder comments provided valuable information to the ASI audit team to prepare for the audit and to focus on certain aspects. Due to the nature of a witness audit the ASI audit team was unfortunately not able to follow-up on each of the comments received and was therefore focussing on the main worries expressed related to the uniqueness of the forest ecosystem and the protection of the high conservation values. Therefore, ASI expects from SGS Qualifor that they follow-up on the remaining stakeholder comments in the next surveillance audit (**REC.SGS.FM.POL.2006.02**).

Main stakeholder comments	ASI response
<p><u>FSC Poland re SGS Poland:</u></p> <ul style="list-style-type: none"> <li>- lack of cooperation with FSC Working Group in Poland,</li> <li>- lack of information and cooperation regarding marketing and training activities telephonic insulation directed to the FSC-Poland,</li> <li>- unjustified certification decisions regarding the RDSF Bialystok,</li> <li>- lack of proper identification of sampling areas and a lot of other which one can find in</li> </ul>	<p>Problems in the SGS decision making procedure have been confirmed and are addressed by ASI Major CARs <b>CAR.SGS.FM.POL.2006.01</b> and <b>CAR.SGS.FM.POL.2006.02</b> (see Annexes).</p> <p>Lack in applying the FSC sampling strategy has been confirmed and is</p>

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<p>separate materials.</p>	<p>addressed by ASI CAR <b>CAR.SGS.FM.POL.2006.07</b> (see Annexes).</p> <p><u>Comment from SGS Poland:</u> SGS has participated in two meetings of the Polish FSC Working Group, has commented on 3 versions of the Polish FSC Standard, has changed correspondence regarded with HCVF, has proposed joint organization of training in the issue of HCVF. Unfortunately – there was no positive response from the side of FSC Poland for letters and proposals of SGS.</p>
<p><u>Polish ENGO:</u> Person very familiar with operation and SGS certification process. On the area of Primeval Forest Puszcza Augustowska and Knyszyńska there were conducted clear cuts without leaving of fragments for natural disintegration; in Primeval Forest Puszcza Bialowieska there are performed harmful from biodiversity point of view, unfeasible economically silvicultural operations, and reconstructing of stands “by force” incompatible with GTD model- and majority if stands is characterized by such incompatibility. “Disappeared” 2 of 4 Major CARs and 2 were qualified as Minor without presenting by RDSF of “action plan”, without formal approval of that plan by SGS and without additional audit., which was expected in September 2005. In Bialowieska Primeval Forest the trees are cut down in old growths; fencing of large areas of young forest crops (limitation of feeding and territorial base of wild animals), hunting, in this at the boundary of Poland (or even within this area) of nature reserves; forest fragmentation by making forest roads accessible for traffic. Private contractors are dishonestly treated by forest manager of public forest – Administration of SF. National producers are victims of monopolistic practices. Local timber customers pay by 30 to 100 PLN more for one stereo meter of wood than whole buyers from more remote regions.</p>	<p>Problems in addressing Major CARs by SGS Qualifor have been confirmed and are addressed by ASI Major CARs <b>CAR.SGS.FM.POL.2006.01</b> and <b>CAR.SGS.FM.POL.2006.02</b> (see Annexes).</p> <p>The issue of clear-cuts could not be fully evaluated in this audit. From what the ASI team saw however there was sufficient evidence to conclude that ecological functions and values are not maintained intact, enhanced, or restored by the felling system applied (see <b>CAR.SGS.FM.POL.2006.11</b>).</p>
<p><u>Polish ENGO:</u> In a separate mail the stakeholder elaborated in details and referring to violations of FSC Criteria in the RDSF Bialystok (materials available). In one of</p>	<p>Problems in compliance of RDSF Bialystok with FSC certification requirements have been confirmed in this audit and are addressed by</p>

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<p>most valuable forests of Europe in Primeval Forest Puszcza Bialowieska there is lack of identification of HCVF. The remnants of natural forest stands and of natural origin should be excluded from forest operation. They frequently constitute the pattern for the altered lowland forests in Europe.</p>	<p>CARs (see Annexes).</p> <p><u>Response from SGS Poland:</u></p> <p>All elements which consist of HCVF were identified by RDSF staff. They are recorded and documented in Nature Conservation Programs of superintendences as well as in Conservation Program of the Forest Promotional Complex of BPF. More over – even if WWF organization has elaborated and published the booklet about HCVF in BPF – it was not appropriately distributed. Finally SGS has considered the fact of existing of HCVF in RDSF forest areas – what may be written in the SGS report from the Reassessment.</p>
<p><u>Polish Scientific Institution:</u>          Process of certification takes place without public consultation and particularly with omitting scientific circles engaged in nature protection. Activity of the State Forests (SF) on the area of Primeval Forest Puszcza Bialowieska are violating of nature values, and are threatening of natural lowland forest remnant of Europe. The main problems in Primeval Forest Puszcza Bialowieska are:</p> <ul style="list-style-type: none"> <li>- Cutting down of oldgrowths, the last in Europe remnants of primeval forests (natural ones).</li> <li>- Planting trees on clearcuts, what prevents natural forest regeneration; there are created artificial (fenced) production plantations in place of so far existing of natural forests.</li> </ul> <p>Hunting in nature reserves (high seats for hunters in reserves are still used and renovated). In general forest management is useful, but in case of Primeval Forest Puszcza Bialowieska it should not be conducted in stands of natural origin.</p>	<p>Major problems in compliance of RDSF Bialystok with relevant elements of FSC Principle 9 regarding stakeholder consultation at all levels of HCVF definition, reassessment and protection, have been confirmed in this audit and are addressed by ASI Major CAR <b>CAR.SGS.FM.POL.2006.04</b> (see Annexes).</p> <p>Whether or not forest management should be stopped in a case like Primeval Forest Puszcza Bialowieska is a political decision and outside of the scope of this certification.</p> <p><u>Response from SGS Poland:</u>          “Cutting down of old growths” – since 2003 there is a valid Decision Of the Ministry of Environment which does not allow this practice (with two exceptions). Regarding “planting trees on clearcuts” – this is not a normal practice, normally in BPF they prevail the natural regeneration.</p>
<p><u>Polish Scientific Institution:</u>          This stakeholder is an employee of Forest Research Institute in Bialowieza. Nobody</p>	<p>Comment recorded.</p>

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<p>approached him on forest certification. He knows the issue only generally for, professional literature.</p>	
<p><u>Polish National Park Authorities:</u> The information on certification passed on National Park by SGS was only cursory and took place too late prior to audit. After the certification procedure there was no contact with the National Park and no information on how the remarks of the National Park Authorities would be taken into consideration by SGS. The stakeholder believes that forest management in general is good. Taking into account Puszcza Bialowieska Primeval Forest it is not able to substitute the highest form of protection on which Puszcza Bialowieska deserves. The conflicts between forest managers and stakeholders most frequently apply to a vision of uniform structure and form of conservation and the Puszcza management creating the conditions for sustainable development of region, i.e. the development based more and more on nature conservation of The Puszcza Bialowieska instead on its exploitation.</p>	<p>Feedback on stakeholders comments are included in the public summary report which is available for download on the SGS website. Information about the availability of these reports is included in the stakeholder consultation letter. SGS could however make it clearer that the reports will also include the stakeholder feedback. It is further recommended that SGS provides individual feedback to stakeholders who contribute substantially in the consultation phase.</p>
<p><u>Local government:</u> SGS did not contact them. During their 20-years long practice they state that the change of forest management to change for the better. They say that environmental goals are generally taken into consideration. There are periods, for example, boom in the market, that there are more applications for cutting down of bark beetle infested trees. There is no pressure from many parties and parties generally come to agreement. There are problems with cutting down oaks at the belt of frontier zone. NGO-s and some private persons, in this the scientists want to extend the category of National Park for the whole Primeval Forest Puszcza Bialowieska. On the opposite side one can find as opponents the State Forests and the local communities, who are against it.</p>	<p>Comment recorded.  Whether or not forest management should be stopped in a case like Primeval Forest Puszcza Bialowieska is a political decision and outside of the scope of certification. For FSC certification it is important that HCVF attributes are detected and measures are taken to maintain and/or enhance the applicable conservation attributes consistent with the precautionary approach as stated in Principle 9.</p>
<p><u>Polish Social group:</u> During the certification process in May 2005 we presented our comments about the RDSF Bialystok (document attached). We did not get any answer. Till today all problems we described are still valid. Additionally there are still examples which show that the forest management practices are not in compliance with Polish law (no remnant trees on harvesting areas). As an example we would like to present the problem in Superintendency Szczebra, compartment 279c and 279g, where all compartments were cut</p>	<p>Feedback on stakeholders comments are included in the public summary report which is available for download on the SGS website. Information about the availability of these reports is included in the stakeholder consultation letter. SGS could however be more active in communicating that the audit reports also include the stakeholder feedback. It is further recommended that SGS provides</p>

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<p>without keeping necessary remnant trees and with violation of bird protection zones. The area is located less than 500 m from the White Eagle (<i>Haliaeetus albicilla</i>) zone which shall be protected. Surface of compartment is more than 50 000 square meters. Whole priority habitat from Annex I of Habitats Directive (Bog woodland 91DO) was cut. Moreover in spring 2005 cuts took place exactly in the White Eagle zone. Similar situation take place in the compartment 251, where large part of it was cut, just on the edge of the Lesser Spotted Eagle (<i>Aquila pomarina</i>) zone.</p>	<p>individual feedback to stakeholders who contribute substantially in the consultation phase.</p> <p>The issue of clear-cuts could not be fully evaluated in this audit. From what the ASI team saw however there was sufficient evidence to conclude that ecological functions and values are not maintained intact, enhanced, or restored by the felling system applied (see <b>CAR.SGS.FM.POL.2006.11</b>).</p>
<p><u>Polish NGO:</u> In the questionnaire the stakeholder refers only to the area of Primeval Forest Puszcza Bialowieska, which in his opinion should not be a commercial forest and SGS does not constitute the proper organization to evaluate what is going on and what should be going on in the area of Primeval Forest Puszcza Bialowieska. Undoubtedly – in context of international scale conflict, which is lasting for many years – the current situation influences the whole Direction of RDSF. He does not evaluate of forest management in commercial forest outside of Primeval Forest Puszcza Bialowieska because he does not know it adequately.</p>	<p>Whether or not forest management should be stopped in a case like Primeval Forest Puszcza Bialowieska is a political decision and outside of the scope of certification.</p> <p>SGS believes that stakeholder do not sufficiently distinguish between the area within the scope of the certificate and the area of the National Park and that this often leads to unfair criticism of the RDSF.</p>
<p><u>Polish ENGO:</u> SGS never contacted this stakeholder. He is considering the forest certification as useful for timber selling, although he is not able to estimate of its impact on potential increase of sale. In his opinion certification does not influence of forest management and the forest management in Poland is good one. Problems in forestry comprise: - bad working conditions of ZULs (forest contractors) (low wages, poor equipment, low quality of services, limited possibility for supervision because ZULs are employing subcontractors illegally in some cases , in superintendences, the supervision, not always is correctly executed.</p>	<p>Comment recorded.</p>
<p><u>Local Hunting:</u> This stakeholder is a hunter. He has worked for 17 years in the region of RDSF Bialystok. SGS did not contact him. He heard about forest certification from RDSF Bialystok. In his opinion State Forests part of wasteland (for instance: blanks, barren</p>	<p>Comment recorded.</p>

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<p>land, areas close to bogs) instead of planting trees should in greater extent dedicate for agricultural utilization (for example: meadows) useful for game, enriching in this way the feeding base for game animals. He is not willing to peak his mind on local conflicts because he is afraid to harm somebody. He is considering forest management as being good.</p>	
<p><u>Local Fishing:</u> This stakeholder does not know anything about forest certification and nobody contacted them in this matter. The stakeholder is conducting activity on the area of State Forest ownership. Cooperation with RDSF Bialystok is correct.</p>	<p>Comment recorded.</p>
<p><u>Polish Social group:</u> Forest certification has an important meaning. It creates opportunity for public to declare its opinion on forest management. It makes the system more transparent and eliminates the suspicion of “mafia practices” in forests. In their opinion forest certification creates a real picture of forest management.</p>	<p>Comment recorded.</p>
<p><u>Polish Social group:</u> Forest certification – in general one understands what is going on but he was not informed about it by SGS. Everything takes place at the level of RDSF Bialystok Office. In local forestry there were problems with ash dieback, now they are wit oak decline. Forest Certification in his opinion is a good idea, but it should be functioning the whole year long, not only directly before audit. Cooperation with Superintendence is correct. Superintendence is obeying Collective Agreements of the Rights and Duties of the Employers and Employees. negotiated and fixed with the Director General of SF. SF on the area of Bialystok are using currently the sum of 30 mln PLN from EU budget designed on forest road improvement. During windstorm of 4 July 2004 suffered mostly forest roads and mainly these ones without firm pavement and at present their state is tragic. Problem also cerates complicated legal procedure linked with Public Procurement Law and its difficult legal language. ZULs (forest contractors) constitute places of employment important for local community, where, in some places, the level of unemployment reaches 30 to 40%.</p>	<p>Certain problems with road maintenance of RDSF Bialystok have been confirmed in this audit and are addressed by an ASI CAR <b>CAR.SGS.FM.POL.2006.05</b> (see Annexes).</p>
<p><u>District Board:</u> is interested In forest problems, thus forest issues</p>	<p>Comment recorded.</p>

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<p>are addressed from the General Board. He only knows that there was notification at General Board on forest certification in State Forests. SGS did not approach him. Even if Nature Protection League was sending its remarks on forest certification of SF it was never receiving back any kind of information. There was a total lack of feedback.</p> <ul style="list-style-type: none"> <li>- Certification is a good tool of nature protection,</li> <li>- There is obviously lack of broader information (advertising)) on the subject of certification in the State Forests</li> <li>- No one knows, what the benefits of certification are.</li> </ul> <p>Forest management in Poland is good.</p>	
<p><u>Polish Forest Society:</u> SGS did not get in touch with Polish Forest Society</p> <ul style="list-style-type: none"> <li>- SGS not in every issues is competent</li> <li>- some problems emphasized by SGS for SF have little importance</li> </ul> <p>Current problems in forests are the following ones:</p> <ul style="list-style-type: none"> <li>- tree diseases,</li> <li>- damage caused by game,</li> <li>- a need to prepare seedlings for afforestation of post agricultural lands in the frame of PROW Program should be signaled for SF in advance,</li> <li>- used by ecologists spot check of nature should be replaced by holistic view</li> </ul> <p>quarrels with ecologists</p>	<p>Comment recorded.</p>
<p><u>Forest Entrepreneurs in Poland.</u> We represent more than 200 entrepreneurs in our Association. We are also member of the European Network of Forest Entrepreneurs (ENFE).</p> <p>The FSC certification process refers in many of it's criteria to the conditions of our work. Despite this we were not contacted within last 9 years by the certifiers regarding this process. Recently we joined the Polish FSC Working Group to be able to influence the certification process and to include our arguments into the Polish National Standard document.</p> <p>We would like to express our dissatisfaction regarding the fact that the system you represent does not recognize the problems which occur in the forest workers sector. We are able at this stage to express only main problems, without giving detailed description of the location and particular involved</p>	<p>Comment recorded.</p> <p>Issues regarding salaries and employment are difficult to evaluate and to judge since workers rights requirements beyond ILO are so far not much developed. This would require a process within the FSC system to strengthen these.</p> <p><u>Response from SGS Poland:</u></p> <p>Records with numbers from 2 to 7 are very general without any objective evidence.</p>

<p>persons / companies:</p> <ol style="list-style-type: none"> <li>1. Low level of payments which cause:             <ul style="list-style-type: none"> <li>- Lack of possibility to secure required Health and Safety measures</li> <li>- Low salaries of forest workers, often the lowest in the region</li> <li>- Necessity of employing workers without regular contracts and without legal contracts at all</li> <li>- Lack of interest from young people side - lack of perspectives to stay in the profession.</li> <li>- No possibility to educate, train and improve know-how</li> </ul> </li> </ol> <p>This results clearly from the one-sided decisions of State Forest Administration:</p> <ul style="list-style-type: none"> <li>- the contractor's fees (prepared as maximum fees during the tenders) are calculated without transparency and possibility of monitor it. They clearly violate scientifically enumerated minimum fees.</li> <li>- contractor's fees does not recognize the different categories of field difficulties</li> <li>- contractor's requirements expected during tenders are lower than prescribed by legal regulations</li> </ul> <ol style="list-style-type: none"> <li>2. Practices of discrimination towards particular companies to promote other particular companies during the tenders organized by forest administration</li> <li>3. Unbalanced financial decisions of administration - saving of the costs at the level of forest workers contracts and luxurious contracts on the side of forest administration (offices, buildings, cars, IT equipment)</li> <li>4. Unbalanced and destructive investments made by Superintendence's in the own harvesting equipment which clearly create competition to the private contractors.</li> <li>5. Violations of already signed contracts through one-sided decisions of Superintendency Directors (reduction of operation areas and fees)</li> <li>6. Engagement of new, external contractors for the forest work from the package of already agreed contracts.</li> <li>7. Practices which lead to uncontrolled lost of wood and salary by forest workers before it's registration by Forester.</li> <li>8. Examples of transition of salaries paid for</li> </ol>	
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<p>activities made by external entities (chainsaw trainers) through private entrepreneurs already contracted in particular superintendence's. Afterwards entrepreneurs are enforced to return such financial profits privately to the superintendency directors!</p> <p>9. Often practices which enforce contracted forest workers to extend their scope of work (measurements during wood registration, branch pruning during late cleaning, selective bucking)</p> <p>10. Lack of cooperation (in selected RDSF's) between organised Forest Entrepreneurs and State Forest representatives, even despite the General Director resolutions (39/36A) which require and describe this cooperation.</p> <p>On 25th of April we also organized the meeting with the new General Director of State Forest to express our concerns. We attached you the report (in Polish) from this meeting which clearly show that even the Director is aware about above non-compliance with existing legal regulations. He indeed promise to improve the situation, but we heard such promises many times.</p>	
<p><u>Local Economic:</u> The company is consumer of more than 30 thous. cu. m. of solid wood from RDSF Bialystok. It has a product certificate of FSC, thus is interpreted forest certification of SF. SGS approached of their plenipotentiary for certification. Cooperation with RDSF in Bialystok is good.. They would like that SF produced wood in sizes technologically convenient for them.</p>	<p>Comment recorded.</p>
<p><u>Polish ENGO:</u> Feels a lack of information on forest certification since 2003. They have not received but one questionnaire to express her opinion. There were no further contacts with SGS and SGS is not objective- and disregards opinion of the Organization. Certification of the whole RDSF is not legitimate. In their opinion certification should be conducted on the level of superintendence Some superintendences work properly. Comments of Organization have not been taken into consideration by SGS. The conservation of the Primeval Forest Puszcza Bialowieska is not sufficient – some oldgrowths are cut down. :In Primeval Forest Puszcza Knyszynska there were conducted harvesting operation on a large scale. The stakeholder worked for years at the Mammal Research Institute Polish Academy of Sciences In</p>	<p>Feedback on stakeholders comments are include in the public summary report which is available for download ion the SGS website. Information about the availability of these reports is included in the stakeholder consultation letter. SGS could however make it clearer that the reports will also include the stakeholder feedback. It is further recommended that SGS provides individual feedback to stakeholders who contribute substantially in the consultation phase.</p> <p>Whether or not forest management should be stopped in a case like Primeval Forest Puszcza</p>

<p>Białowieża and knows the forests of RDSF Białystok pretty well. On the subject of forest certification there were articles in Gazeta Wyborcza (6th September 2005, by Mr. Adam Wajrak) and in Las Polski on the subject of a suit brought by the <b>Greens' Federation "GAJA"</b> against RDSF Białystok). In general forest management is bad. one can find information on 7 old oaks cut down close to the frontier zone on Web:  <a href="http://www.bialystokonline.pl/artukul.php?ida=1208">http://www.bialystokonline.pl/artukul.php?ida=1208</a>  Performance of sanitary cutting in nature reserves is another example of bad forest management. In years 2000-2002 the trees were taken off when was obligatory the general Decision on taking off trees infested by bark beetle.  The well known examples are related with the subsequent years.  In 2003:  - .Wysokie Bagno Reeserve (Superintendency Białowieża) – cutting out ca.160 trees at the close to order belt  - Siemianówka Reeserve (Superintendency Browsk), birds protection zones – cutting out of infested spruces.  In 2004:  - removing infested spruces form the Lipiany Reserve  - removing a few dozen of trees form The W. Szafer Reserve,  - removing dead and dying trees from ".Lasy Naturalne PB Reserve".  The cases of unlawful tree removing were observed during audit in 2005 and were the cause of CARs 06, 07 and 08.  This stakeholder was invited by the ASI team to join the closing meeting but did not show up.</p>	<p>Białowieska is a political decision and outside of the scope of certification.</p> <p>Major problems in compliance of RDSF Białystok with relevant elements of FSC Principle 9 regarding stakeholder consultation at all levels of HCVF definition, reassessment and protection, have been confirmed in this audit and are addressed by ASI Major CAR <b>CAR.SGS.FM.POL.2006.04</b> (see Annexes).</p> <p>The issue of clear-cuts could not be fully evaluated in this audit. From what the ASI team saw however there was sufficient evidence to conclude that ecological functions and values are not maintained intact, enhanced, or restored by the felling system applied (see <b>CAR.SGS.FM.POL.2006.11</b>).</p> <p>Cutting of trees in protected areas was reported as exceptional sanitary felling.</p> <p><u>Response from SGS Poland:</u></p> <p><i>"Cutting oaks at the belt of frontier zone" – this issue was focused of the court proceeding, which finally acquitted Forest Staff from raised charges (2005). Continuous recalling of this example is evidence of not taking cognizance of the objective events.</i></p>
<p><u>Robin Wood (German ENGO):</u>  SGS did not sufficiently address that the whole area must be treated as <i>High Conservation Value Forest (HCVF)</i>. It is a very unique forest ecosystem and therefore parts are already declared as <i>World Heritage Site</i> and <i>National Park</i> (IUCN approved).</p>	<p>Major problems in compliance of RDSF Białystok with FSC Principle 9 have been confirmed in this audit and are addressed by an ASI Major CAR (see Annexes).</p> <p>SGS believes that stakeholder do not sufficiently distinguish between the area within the scope of the certificate and the area of the National Park and that this often</p>

FSC Forest Management Surveillance Audit of SGS for 2006: Bialystok

	leads to unfair criticism of the RDSF.
<p><u>International ENGO:</u>                  During whole process of certification of RDSF Bialystok we observed and experienced numerous cases of violating FSC principles, such as such as transparency and independence of certification procedure, stakeholder consultation requirements etc. We are extremely disappointed with SGS QUALIFOR policy in RDSF Bialystok, which has led to downgrading of FSC certificate to a cover for deliberate degradation of one of most valuable forests in Poland and Europe.</p>	<p>Comment recorded.</p> <p>Problems were detected and addressed (see Annexes).</p> <p><u>Response from SGS Poland:</u></p> <p><i>closing out and downgraded CARs was made in line with SGS Procedure 04-01</i></p>

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
Decision making (20-002, Part 2)	<p>At the time of the ASI audit, there was factual evidence that the company had not implemented appropriate procedures to comply with Criterion 6.1 and Criterion 9.2. Preconditions issued by SGS to address these nonconformities had subsequently been closed or downgraded without sufficient evidence of demonstrated implementation and field performance. <b>The following major CAR is proposed: CAR.SGS.FM.POL.2006.01</b></p> <p>In addition to the above mentioned, the SGS auditor extended minor CARs for years without ever receiving sufficient objective evidence of compliance with FSC requirements or upgrading the minor CARs as required by SGS procedure. <u>Examples:</u> CAR # 40 was issued on 18 June 2004 because of the lack of monitoring of the effectiveness of measures to protect conservation values in HCVF. Cards of assessment of the state of protected objects and cards of sites of the rare, threatened and endangered species were presented as close-out evidence by the Superintendences. The CAR was closed on 20 May 2005 and replaced by new minor CAR 07. In the closing meeting of this audit CAR # 07 was again extended by the SGS lead auditor since RDLP Bialystok still couldn't present sufficient close-out evidence. Other examples: CAR 37 closed and by new raised CAR 43; CAR 38 closed and by new raised CAR 05. <b>The following</b></p>

	<p><b>major CAR is proposed: CAR.SGS.FM.POL.2006.02</b></p> <p>Also in other cases, SGS procedure 04-01 was not adequately implemented which resulted in an up- and downgrading of CARs without ever reaching a point of full compliance with certification requirements or resulting in disciplinary measures. <u>Examples:</u> Minor CAR # 36 was issued on 18 June 2004, closed on 16 May 2005 and replaced by Major CAR # 03 and minor CAR # 06. Major CAR # 03 was closed on 20 July 2005 “<i>and minor CAR 09 has been raised in these same issues</i>” (SGS re-audit report p. 51). At this point in time SGS should have suspended the certificate according to FSC requirements. In this audit minor CAR 09 was finally proposed to be closed. A similar incident happened with Major CAR # 04, replaced by minor CAR # 10 and extended in this audit. Another example is Major CAR 25 which was replaced by CAR 35 which then was replaced by CAR 38, again replaced by new raised CAR 05 and finally proposed to be extended again in this audit. The history of the RDLP Bialystok certification reveals a number of similar examples where nonconformities are carried forward for years without proper disciplinary action taken by SGS.</p>
<p>Standard adaptation (20-003)</p>	<p>Poland does not have an FSC accredited national forest stewardship standard. Therefore, the SGS audit team applied the “SGS Qualifor forest management generic standard, adapted to local requirements in Poland (June 2005)”. The adapted standard however is not in full compliance with FSC requirements. Relevant annexes to the standard are missing. <b>The following CAR is proposed: CAR.SGS.FM.POL.2006.06</b></p>
<p>Auditor qualification (20-004)</p>	<p>Wlodzimierz Jankowski is a trained SGS lead auditor and complies with qualification requirements of FSC. There is however no evidence that Mrs Maria Sakowska –who independently audited compliance with selected elements of the standard during the audit- has received the required auditor training <b>The following recommendation is recorded: REC.SGS.FM.POL.2006.06</b></p>
<p>Stakeholder consultation (20-006)</p>	<p>Stakeholder consultation has been conducted by SGS and is documented in the re-assessment report. The SGS lead auditor provides response to 31 stakeholder comments. Local stakeholders are underrepresented in the SGS stakeholder list and individual feedback to stakeholders providing substantial input is missing</p>

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	<p>(<b>REC.SGS.FM.POL.2006.01</b>).</p> <p>Following the ASI surveillance audit, the ASI audit team agrees with comments made by stakeholders regarding shortcomings of RDLP Bialystok in complying with requirements of Principle 6 and Principle 9. <b>See major CAR.SGS.FM.POL.2006.03 and CAR.SGS.FM.POL.2006.04</b></p>
Evaluation process (20-007 ISO 19011)	<p>SGS auditors did not include a sufficient number of FMUs into their audit sample during this surveillance audit. The total number of FMUs (superintendencies) included in this certificate is 32. 10 FMUs (about 30%) were subject to the main audit in 1999. 50% of this number should be evaluated in each surveillance audit and in the re-certification audit as per FSC sampling requirements outlined in FSC-STD-20-007.</p> <p><b>The following CAR is proposed: CAR.SGS.FM.POL.2006.07</b></p> <p>The SGS audit team made an effort to systematically audit the activities of RDLP Bialystok for compliance with SFC requirements. Time for the audit and number of auditors are acceptable in relation to the size of the operation.</p> <p>The audit technique of the auditors was flawed: both auditors had a kind of “professor” approach. Instead of asking non-guided open questions, explanations and lectures were often given. Staff interviews were conducted in the presence of supervisors. The opening meeting did not follow ISO 19011 recommendations. <b>The following recommendation is recorded: REC.SGS.FM.POL.2006.05</b></p>
Audit report (20-008)	<p>At the time of drafting this report SGS Poland had not yet submitted their audit report for this surveillance audit. Therefore ASI was not able to evaluate compliance with report writing requirements and the effectiveness of the CARs proposed by SGS in the closing meeting.</p>
Public summary (20-009)	<p>A public summary report for the 2005 main assessment was produced using the AD 36 A template and is available for download on the SGS Qualifor website. The summary is bilingual (English/Polish) and consists of 70 pages. At the time of drafting this report, the summary on the SGS website was not yet updated to include the findings and conclusions from this audit. <b>The following CAR is proposed: CAR.SGS.FM.POL.2006.10</b></p>
Application of FSC policies and	<p>The scope of the certificate includes games, herbs,</p>

guidelines	forest fruits and mushrooms. However, the main audit report does not include documented evidence that RDLP Bialystok is in compliance with FSC NTFP requirements. <b>The following CAR is proposed: CAR.SGS.FM.POL.2006.09</b>
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**5 Nonconformities and observations**

Major CAR(s)	Minor CAR(s)	Observations
4	7	7

See nonconformity reports (attached as annexes) for details.

**6 Conclusion and recommendation**

Major problems were detected with SGS procedure 04-01 and the way it is implemented:

- MAJOR CARs are closed and downgraded to MINORs without sufficient close-out evidence;
- MINOR CARs downgraded from MAJORS are extended (in single examples up to 4 times), instead of being upgraded and suspension recommended;
- MINOR CARs are extended consecutively instead of being upgraded.

Similar problems were also detected in recent ASI surveillance audits to SGS FM certificates of Barama (Guyana) and Sveaskog (Sweden). The inadequately developed and implemented SGS procedure 04-01 seems to be the root-cause for many problems in SGS decision making and a threat for the credibility of the SGS Qualifor certification system and subsequently for FSC if not corrected quickly. Continuing non-compliance of RDLP Bialystok with requirements of FSC Criterion 6.1 and all of FSC Criterion 9.2 are the result of this problem.

Update: ASI issued a CAR against SGS in the I2006 office audit addressing the issue of CAR up- and downgrading. SGS is in the process of revising their related procedure to avoid reoccurrence of the problem in future.

Based on the findings of this audit, the ASI auditor recommends to FSC AC the continuation of the FSC forest management accreditation for SGS Qualifor, subject to the timely closing of the nonconformities identified during the audit and specified in the nonconformity reports (attached). If the major CARs are not fully addressed by SGS Qualifor within 3 months following finalization of this report, ASI will recommend to the FSC Board of Directors suspension of SGS Qualifor’s accreditation for forest management certification in Poland.

**Attachments**

Nonconformity reports (NCRs)

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>CAR.SGS.FM.POL.2006.01</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Nonconformity	Status	<input checked="" type="checkbox"/> <b>MAJOR</b> <input type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION	
Major CARs (# 03 and # 04) issued by SGS Qualifor in the re-certification process of RDLP Bialystok had been closed without sufficient performance based close-out evidence.			
Normative Reference(s)	<b>FSC-STD-20-002 Clause 8.3 - 8.6; SGS Procedure 04-01</b>		
Corrective Action Request: <b>SGS Qualifor 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>3 months from finalization of this report.</b>		
Corrective Action implemented by Certification Body			
<b>Here: describe action taken in detail</b>			
Corrective Action evaluated by ASI			
<b>Here: describe conclusion in detail</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.SGS.FM.POL.2006.02</b>	Date	<b>30 November 2006</b>	
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>		
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>		
Nonconformity	Status	<input checked="" type="checkbox"/> <b>MAJOR</b> <input type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION		
Minor CARs replacing previous MAJOR CARs issued by SGS Qualifor in the certification process of RDLP Bialystok were extended after detected repeated noncompliance instead of disciplinary measures (such as suspension of certification) launched. Objective evidence: Major CAR # 04, replaced by minor CAR # 10, extended again in this audit. Minor CAR # 36 replaced by Major CAR # 03 and minor CAR # 06, extended again in this audit. Major CAR # 25 replaced by minor CAR # 35 which then was replaced by minor CAR # 38, again replaced by new raised minor CAR # 05 and finally extended again in this audit. Like this, nonconformities go on and on without being properly addressed and without disciplinary consequences for the certificate holder. Minor CARs issued by SGS Qualifor in the certification process of RDLP Bialystok were extended after detected repeated noncompliance instead of upgraded to Major CARs. Objective evidence: CAR # 40 / CAR # 07.				
Normative Reference(s)	<b>FSC-STD-20-002 Clause 8.6 (info box); SGS Procedure 04-01 6.03</b>			
Corrective Action Request: <b>SGS Qualifor 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>3 months from finalization of this report</b>			
Corrective Action implemented by Certification Body				
<b>Here: describe action taken in detail</b>				
Corrective Action evaluated by ASI				
<b>Here: describe conclusion in detail</b>				
<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:	

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>CAR.SGS.FM.POL.2006.03</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Nonconformity		Status	<input checked="" type="checkbox"/> <b>MAJOR</b> <input type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION
SGS awarded an FSC certificate to RDLP Bialystok despite the fact that RDLP Bialystok could not demonstrate compliance with FSC Criterion 6.1, especially considering the scale and intensity of the operations and the uniqueness of the affected resources.			
Normative Reference(s)		FSC-STD-01-001, Criterion 6.1; SGS Qualifor Forest Management Generic Standard adapted to local requirements in Poland (June 2005), Criterion 6.1	
Corrective Action Request: <b>SGS Qualifor 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>3 months from finalization of this report</b>	
Corrective Action implemented by Certification Body			
<b>Here: describe action taken in detail</b>			
Corrective Action evaluated by ASI			
<b>Here: describe conclusion in detail</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.SGS.FM.POL.2006.04</b>	Date	<b>30 November 2006</b>	
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>		
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>		
Nonconformity		Status	<input checked="" type="checkbox"/> <b>MAJOR</b> <input type="checkbox"/> MINOR <input type="checkbox"/> OBSERVATION	
At the time of this audit ASI did not find sufficient evidence that RDLP Bialystok sufficiently consulted with stakeholders on the definition of HCVF attributes, the identification of the High Conservation Values on the whole territory, and the management options thereof (FSC Criterion 9.2), especially considering the scale and intensity of the operations and the uniqueness of the affected resources.				
Normative Reference(s)		FSC-STD-01-001, Criterion 9.2; SGS Qualifor Forest Management Generic Standard adapted to local requirements in Poland (June 2005), Criterion 9.2		
Corrective Action Request: <b>SGS Qualifor 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>3 months from finalization of this report</b>		
Corrective Action implemented by Certification Body				
<b>Here: describe action taken in detail</b>				
Corrective Action evaluated by ASI				
<b>Here: describe conclusion in detail</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.SGS.FM.POL.2006.05</b>	Date	<b>30 November 2006</b>	
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>		
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>		
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> <b>MINOR</b> <input type="checkbox"/> OBSERVATION	
Forest roads and skid trails inspected by the ASI audit team in the visited compartments of RDLP Bialystok are in a poor condition (maintenance, rutting).				
Normative Reference(s)		FSC-STD-01-001, Criterion 6.5; SGS Qualifor Forest Management Generic Standard adapted to local requirements in Poland (June 2005), Criterion 6.5		
Corrective Action Request: <b>SGS Qualifor 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 office audit</b>		
Corrective Action implemented by Certification Body				
<b>Here: describe action taken in detail</b>				
Corrective Action evaluated by ASI				
<b>Here: describe conclusion in detail</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.SGS.FM.POL.2006.06</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> <b>MINOR</b> <input type="checkbox"/> OBSERVATION	
SGS Qualifor Forest Management Generic Standard adapted to local requirements in Poland (June 2005) does not include as annexes: <ul style="list-style-type: none"> <li>a) a list the national and local forest laws and administrative requirements which apply in the country or region in which the standard is to be used,</li> <li>b) a list the multilateral environmental agreements and ILO Conventions that the country has ratified,</li> <li>c) a list of, or reference to official lists of, endangered species in the country or region in which the standard is to be used,</li> <li>d) The certification body shall prepare a short report listing the principle issues related to the standard where stakeholders have sustained disagreement with the adapted generic standard or where significant differences of opinion about appropriate indicators were expressed by stakeholders, and explaining the basis on which the certification body made its decision in relation to these indicators. The report shall be attached as an annex to the published standard.</li> </ul>			
Normative Reference(s)	FSC-STD-20-003, Clause 2.1 and 4.8		
Corrective Action Request: <b>SGS Qualifor 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 office audit</b>		
Corrective Action implemented by Certification Body			
<b>Here: describe action taken in detail</b>			
Corrective Action evaluated by ASI			
<b>Here: describe conclusion in detail</b>			
<input type="checkbox"/> CLOSED	Name		Date:

<input type="checkbox"/> UPGRADED	auditor:			
<input type="checkbox"/> OTHER DECISION*				
Comments:				

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<h3>NONCONFORMITY / CORRECTIVE ACTION REQUEST</h3>			
REF. No.	<b>CAR.SGS.FM.POL.2006.07</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> <b>MINOR</b> <input type="checkbox"/> OBSERVATION	
RDLP Bialystok comprises of an area of about 580.000 ha and consists of 31 FMUs (see SGS re-certification public summary page 5 and 6). In this surveillance, 2 FMUs (Superintendence Plaska and Superintendence Browsk) were visited. The number of FMU's sampled is not enough to comply with FSC sampling requirements; the sampling strategy applied has also not been explained or described by the SGS audit team in the audit report.			
Normative Reference(s)	FSC-STD-20-007, Clause 4.3.2		
Corrective Action Request: <b>SGS Qualifor 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 office audit</b>	
Corrective Action implemented by Certification Body			
<b>Here: describe action taken in detail</b>			
Corrective Action evaluated by ASI			
<b>Here: describe conclusion in detail</b>			

<input type="checkbox"/> CLOSED <input type="checkbox"/> UPGRADED <input type="checkbox"/> OTHER DECISION*	Name auditor:		Date:	
Comments:				

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<h3>NONCONFORMITY / CORRECTIVE ACTION REQUEST</h3>
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REF. No.	<b>CAR.SGS.FM.POL.2006.08</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)	<b>Hans Joachim Droste</b>		
Through (e.g. office audit, document review)	<b>FM surveillance Audit 2006</b>		
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> <b>MINOR</b> <input type="checkbox"/> OBSERVATION	

The SGS re-certification public summary report for RDLP Bialystok included CAR # 02 for insufficient knowledge of rangers related with principles of leaving holed trees and dead wood as well as lack of documentation of these data. The SGS Lead Auditor reported closure of this CAR in the closing meeting of this surveillance audit. Since the related SGS audit report has not yet been submitted to ASI, the close-out evidence remains unclear since the ASI audit team could not verify compliance with the related certification requirement in the field.

Normative Reference(s)	FSC-STD-01-001, Criterion 6.3; SGS Qualifor Forest Management Generic Standard adapted to local requirements in Poland (June 2005), Indicator 5.6.2.4 and 6.3.3.
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Corrective Action Request:  
**SGS Qualifor 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	<b>Next office audit</b>
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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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<h3>NONCONFORMITY / CORRECTIVE ACTION REQUEST</h3>
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REF. No.	<b>CAR.SGS.FM.POL.2006.09</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Nonconformity	Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> <b>MINOR</b> <input type="checkbox"/> OBSERVATION	

The scope of the certificate for RDLP Bialystok includes NTFPs (game, herbs, forest fruits and mushrooms). However, the re-certification report does not include documented evidence that RDLP Bialystok is in compliance with FSC NTFP requirements.

Normative Reference(s)	FSC-GUI-20-200 Subject 2.8
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Corrective Action Request:  
**SGS Qualifor 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	<b>Next office audit</b>
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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:	
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Comments:

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>CAR.SGS.FM.POL.2006.10</b>	Date	<b>30 November 2006</b>	
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>		
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>		
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> <b>MINOR</b> <input type="checkbox"/> OBSERVATION	
At the time of drafting this ASI surveillance audit report, the public summary report for RDLP Bialystok was not yet updated on the SGS website to include the SGS findings of this audit. According to SGS procedures this should have happened within 60 days after the audit was conducted.				
Normative Reference(s)		SGS Procedure 03-C-01 Clause 15.08		
Corrective Action Request: <b>SGS Qualifor 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 office audit</b>		
Corrective Action implemented by Certification Body				
<b>Here: describe action taken in detail</b>				
Corrective Action evaluated by ASI				
<b>Here: describe conclusion in detail</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.SGS.FM.POL.2006.11</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Nonconformity		Status	<input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> <b>MINOR</b> <input type="checkbox"/> OBSERVATION
The clear fell methods applied by RDLP Bialystok (including burning of all branches and residues after felling, no retention of ecological trees, lack of deadwood, ploughing of the soil before planting and consequently over years implementing monoculture methods) do not provide evidence that ecological functions and values are maintained intact, enhanced, or restored.			
Normative Reference(s)		FSC-STD-01-001, Criterion 6.3; SGS Qualifor Forest Management Generic Standard adapted to local requirements in Poland (June 2005), Criterion 6.3	
Corrective Action Request: <b>SGS Qualifor 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 office audit</b>	
Corrective Action implemented by Certification Body			
<b>Here: describe action taken in detail</b>			
Corrective Action evaluated by ASI			
<b>Here: describe conclusion in detail</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>REC.SGS.FM.POL.2006.01</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> <b>OBSERVATION</b>	
Local stakeholders are underrepresented in the SGS stakeholder list and individual feedback to selected key stakeholders who provided substantial input is missing.			
Normative Reference(s)	FSC-STD-20-006, Clause 7.3		
Comments:			

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>REC.SGS.FM.POL.2006.02</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> <b>OBSERVATION</b>	
Stakeholders provided valuable comments to ASI prior to the audit which could not all followed-up upon due to the witness audit circumstances. It is strongly recommend that SGS Qualifor reviews the list of comments in Section 3 of this report and reports on the findings after evaluating them in the next			

surveillance audit to RDLP Bialystok.	
Normative Reference(s)	FSC-STD-20-006, Clause 5.2 and 8.1
Comments:	

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>REC.SGS.FM.POL.2006.03</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> <b>OBSERVATION</b>	
Some stakeholders contacted by ASI in the course of this audit complaint about the lack of feedback from SGS to their comments provided I the process. Comments are usually included in the next version of the public summary report but the fact that they are there is not sufficiently explained in the stakeholder letter (AD 39-01).			
Normative Reference(s)	FSC-STD-20-006, Clause 7.3		
Comments:			

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

**FSC Forest Management Surveillance Audit of SGS for 2006: Bialystok**

REF. No.	<b>REC.SGS.FM.POL.2006.04</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> <b>OBSERVATION</b>	
The ASI local expert detected some boundaries of compartments and special protection areas within the management area of RDLP Bialystok which were not adequately and consistently demarcated.			
Normative Reference(s)	SGS Qualifor Forest Management Generic Standard adapted to local requirements in Poland (June 2005), Indicators 2.1.1.2, 6.2.2, 6.2.5.4, 6.5.1.8, 6.5.3		
Comments:			

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>REC.SGS.FM.POL.2006.05</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> <b>OBSERVATION</b>	
Mr Włodzimierz Jankowski and Mrs Maria Sakowska did not adequately employ audit techniques in the 2006 surveillance audit at RDLP Bialystok as recommended in ISO19011.			
Normative Reference(s)	FSC-STD-20-004, ISO 19011 Clause 6.5.4, 6.5.5		
Comments:			

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>REC.SGS.FM.POL.2006.06</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> <b>OBSERVATION</b>	
There was no evidence that Mrs Maria Sakowska –who on some occasions independently audited compliance with selected elements of the standard during this surveillance audit at RDLP Bialystok - has received formal auditor training of SGS Qualifor.			
Normative Reference(s)	SGS Procedure 12-01, Clause 5.6 c		
Comments:			

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### NONCONFORMITY / CORRECTIVE ACTION REQUEST

REF. No.	<b>REC.SGS.FM.POL.2006.07</b>	Date	<b>30 November 2006</b>
Nonconformity detected by (name of auditor)		<b>Hans Joachim Droste</b>	
Through (e.g. office audit, document review)		<b>FM surveillance Audit 2006</b>	
Observation	Status	<input type="checkbox"/> MAJOR <input type="checkbox"/> MINOR <input checked="" type="checkbox"/> <b>OBSERVATION</b>	
Sanitary fellings in protected areas of RDLP Bialystok are conducted without any impact assessment			

FSC Forest Management Surveillance Audit of SGS for 2006: Bialystok

and are reported to be in line with Polish regulations. There is evidence that this constitutes a conflict between laws and regulations and FSC requirements which requires evaluation by SGS Qualifor.

Normative Reference(s)	FSC-STD-01-001, Criterion 1.4
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Comments:
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