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AUDIT REPORT				
Audited Organization				
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Certificate				
Certificate type	Single	☐ Multiple FMU	Group	☐ SLIMF Group
First Issue date 11. July 2013				
Recertification	11. July 2018 Expiry date 10. July 2023			
FSC FM/COC certificate number	GFA-FM/COC-002384			
FSC License Code	FSC-C109614			
National FSC FM Standard for	Country		Version	
Generic GFA Standard, adapted for FM in	Country	Cambodia	Version	1.1
Further standards	Requirements for the use of	FSC-Trademarks F	SC-STD-50-001 V1-2	
Date, Audit Type, Auditor/s				
Audit type	ype Re-Certification,			
Audit date	From 23.04.2018 to 26.04.2018			
Report date	10.05.2018			
Lead auditor	Nicolas PERTHUISOT  Qualification: forest engineer - GFA FM/COC Lead Auditor since 2016			
Other auditors /experts	Other auditors /experts  Nith CHHIN  Qualification: local expert			



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# 1 Scope of Certification

	raphic lo-	Latitude:			N/S 104 ° 08'		
catio	n:	Longitude			E/W 11 ° 31'		
Forest zone:		boreal	tempera	te	subtropical	tro	ppical
1 016	st zone.						$\boxtimes$
Forest Type:		Natural	Plantatio	on	Semi-natural a	nd mixed pla ural forest	intation &
			$\boxtimes$				
Tenu	re manage-	Concession	Commun	ity	Private	Р	ublic
ment	:	$\boxtimes$					
Tenu ship	re owner-	Government	Community	Priv	vate Pub	olic In	digenous
Silip							
Certif	fied forest	Tota	l area in ha:		Total nur	mber of FML	Js:
area:		7,896.11			1		
		<100 ha	100-1000	) ha	1000-10.000 h	a > 10	.000 ha
	numbers ize class:	FMUs	FM	//Us	1 FMUs		FMUs
Number of group members per size class:		<100 ha	100-1000	) ha	1000-10.000 h	a > 10	.000 ha
		FMUs	FM	/IUs	FMUs		FMUs
		Natural forest - SLIMF Boreal:	Boreal:	ha ha	Plantations: SLIMF Plantatio		913,08, ha ha
^ ^ E	Class	Natural forest - 0	Conservation:983,	,03 ha	Natural forest -	Temperate:	ha
AAF	Ciass .	SLIMF Conserv	ation:	ha	SLIMF Tempera	ite:	ha
		Natural forest -		ha	Natural forest -	Tropical:	ha
		SLIMF Commun	nity:	ha	SLIMF Tropical:		ha
Scope of certification		ion: Forest ma	inagement and tra	ade of	Roundwood (lo	gs)	
Nr.	Nr. Product type(s)* Level* Main output category		Species (	Scientific n	ames)		
1 Roundwood (		logs) W1.1	FSC 100%		Tectona grandi Eucalyptus Eur Acacia mangiu	rophylla &ca	
					Khaya senegal		
	* Acc. to ESC Product Classification (ESC-STD-40-004 a)						



#### 2 Description of the area included in the scope of certification.

#### 2.1 Production forest and protected areas

6674,97 ha are production forest classified as plantation.

ha are production forest.

983,03 ha are forest and non-forest areas protected from commercial timber harvesting and are primarily managed for conservation objectives.

ha are forest and non-forest areas protected from commercial timber harvesting and are primarily managed for NTFP production or services.

238,11 ha are other areas, namely: Road, nursery, gravel pit, cattle Area, villagers land

### 2.2

Hig	h Conservation Values (HCV)
0 h	a are classified as High Conservation Value (HCV).
$\boxtimes$	HCV are not present in the FMU(s).
	of the existing high conservation values (if applicable), according to categories defined by the Proest HCV Toolkit ( <a href="http://www.proforest.net">http://www.proforest.net</a> ):
	HCV 1 – Species diversity. Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels.
	HCV 2 – Landscape-level ecosystems and mosaics. Intact forest landscapes and large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.
	$HCV\ 3-E cosystems\ and\ habitats.\ Rare,\ threatened,\ or\ endangered\ e cosystems,\ habitats\ or\ refugia.$
	$HCV\ 4-Critical\ ecosystem\ services.$ Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.
	HCV 5 – Community needs. Sites and resources fundamental for satisfying the basic necessities of local communities or Indigenous Peoples (for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or Indigenous Peoples.

#### 2.3 Regeneration of the forest

6674.96 of forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems.

tified through engagement with these local communities or Indigenous Peoples.

HCV 6 - Cultural values. Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or Indigenous Peoples, iden-

983,03 ha of forest regenerated primarily by natural regeneration or a combination of natural regeneration and coppicing of the naturally regenerated stems (coppice shoots).

#### 2.4 Partial certification

Areas of forest which the certificate holder has some responsibility, whether as owner (including shared or partial ownership, with a minimum of 51%), manager, consultant or other responsibility):

Name and location of ex- cluded areas	Size of area in ha	Justification for exclusion
NA		

No partial certification. The entire area of the concession is included in the scope. Apart from the concession, Grandis Timber Ltd undertakes, in the framework of an agreement with the Ministry of Agriculture. Forestry and Fisheries (MAFF), to participate in the conservation and in the control of the governmental conservation area located to the North West of the concession (2259 ha)



# 2.5 Areas within the FMUs that have been excised from the scope of certification by management decision of the certificate holder

Name and location of ex- cluded areas	Size of area in ha	Justification for exclusion
NA		

Description of the controls that are in place to prevent confusion being generated as to which activities or products are certified, and which are not: See chapter "Tracking, tracing and identification of certified products".

### 3 Forest operation

#### 3.1 Use of lands and forests (history)

Brief description of the history of the use of lands and forests:

The Concession Area was heavily logged during the late 1980's early 1990's. Since then, local residents have harvested small diameter logs off the site for firewood and charcoal production. The current state of the forest cover on the site is severely degraded and in some areas in the early stages of desertification

This area was previously under an economic concession, which has been terminated due to failure of the concessionaire to make the necessary progress in developing the concession

The concession has been awarded to Grandis Timber Limited with a total area of 7,896.11 hectares. in accordance with Chapter 5 of 2002 Land Law and Sub Decree 146 Economic Land Concessions, under a contract with the Ministry of Agriculture, Forestry and Fisheries (MAFF). The last version of the contract was firmed the 01/12/2017

#### 3.2 Regional forestry framework

Description (legislation, administration and land use contexts, roles of government agencies involved in forest management):

The basis for forest management is the Cambodian Forestry Law of 2003

The Cambodian Forestry Administration (FA) is a government authority under the Ministry of Agriculture, Forestry and Fisheries (MAFF) in managing forests and forest resources according to the National Forestry Sector Policy and the Forestry Law.

The Forestry Administration has a unique management and organization structure for the whole country in vertical line, which divided into central, inspectorate, cantonment, division, and triage forestry administration levels (French model)

There is no particular regulation for forest plantations because they are considered as agricultural crops (interview with the Head Officer of the Cambodian Forestry Administration, April 3, 2013, Phnom Penh).

#### 3.3 Evaluated organization

### 3.3.1 Description of the structure of the organization

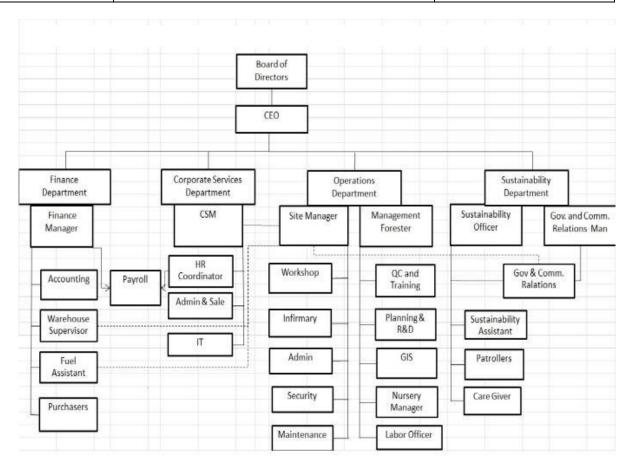
a) Organization, management structures, ownership, responsibilities, use of contractors, and others implemented by the certificate holder:

Grandis is a commercial reforestation company, developing high value tropical hardwood plantation assets on areas of degraded to severely degraded ex-natural forest land. Grandis Timber is the wholly owned subsidiary of Monsoon Timber K/S.

The organization is divided into 4 departments each under a manager reporting to the CEO: Operations, Finance, Corporate Services and Sustainability.

The organizational structure implemented is a procedure driven, hierarchical, matrix type structure.





The responsibilities at each management level and even for the forest workers are detailed in the company's labor policy and respective procedures and in the Master Plan V 7.3

b) Number of workers working in the forest within the scope of certification (estimate):

Total number of employees of forest enterprise: male: 119 female: 8

Number of forest workers (incl. contractors): male: 47 female: 89

Approximately number of day for day-workers worked for Grandis could be varies according to activity

- Pruning- carried out year round
- Weeding- carried out during wet season (between April to November)
- Planting- employ day-workers between 2 to 3 months.

Approximately number of day for contractors worked for Grandis

- Clearing- during dry season only-about 6 months
- Weeding- 10 months
- 3.3.2 Description of the ownership and land use
  - a) Ownership and use-rights (legal and customary) of 3rd parties other than the certificate holder:
    - No ownership and use-rights (legal and customary) of 3rd parties identified.

Grandis Timber Ltd. owns a 50-year contract for a land concession called 'Contract on the investment of Teak Tree Plantation' signed between the company and the Cambodian Ministry of Agriculture, Forestry and Fisheries (MAFF). Thus, the land is property of the Cambodian State as Private state land

The legal and customary user rights of the families' productively occupying land within the Concession Area are protected. Use right are defined in the Forestry law 2003 (chap 9 art 40) as following:

- The collection of dead wood, picking wild fruit, collecting bees' honeys, taking resin, and collecting other forest by-products;
- Using timbers to build houses, stables for animals, fences and to make agricultural instruments;



- Grass cutting or unleashing livestock to graze within the forests;
- Using other forest products & by-products consistent with traditional family use;
- The right to barter or sell forest by-products shall not require the permit, if those activities do not cause significant threat to the sustainability of the forest.

For information, hunting had been forbidden by Grandis Timber Ltd

b) Non-forestry activities within the area evaluated, e.g. mining, agriculture, hunting.

The primary objective of Grandis Timber is the establishment of a teak plantation and the production of high value timber. Agricultural crops (sugar cane) will in some cases be used to support the primary objective and achieve maximum productive land utilization. Agricultural crops will enhance the project benefits by;

- Allow the development of poor soils by the addition of organic matter to improve the soil structure. After an initial four year rotation of sugar cane, soils will be built up and teak establishment in many of these areas will be possible, without any chemicals and fertilizers
- Help to even out labor demand and provide more long term sustainable employment,
- Contributing some short term cash flow,

In 2018, 105.77 ha of sugar cane are planted (mostly in 2017).

Livestock belonging to local communities can freely circulate and pasture in the concession, inside the plantations and inside a dedicated cattle area (98.44 ha)

A nursery has been established to support the plant material required for the establishment of the plantation. The nursery operations consist of mother plant area, clonal area, bud houses and hardening areas established within the Concession Area. A total of 450 000 plants is produced per year (421 000 Teak clones in 2017, 20 000 acacia and 16 000 eucalyptus).

### 3.3.3 Summary of the management plan

a) Management objectives:

The management objectives and activities are clearly indicated in the last updated version of contract firmed 01/12/2017 with MAFF

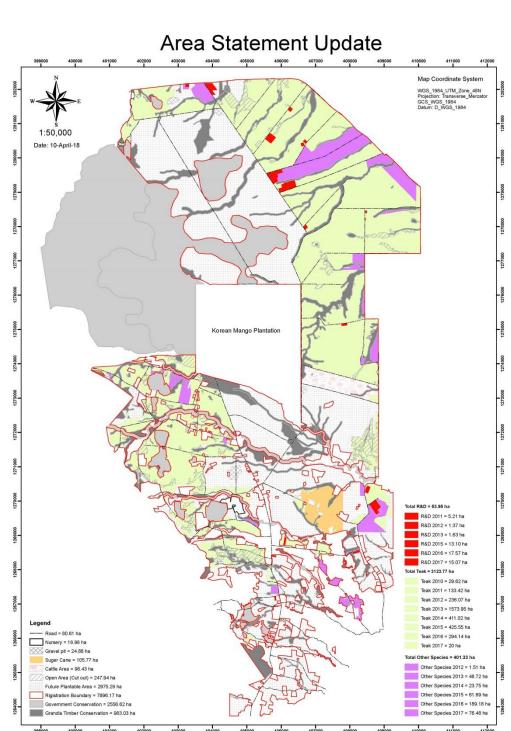
- Teak tree plantation (main production) and other species
- Agro forestry
- Planting seasonal and secondary crops for soil coverage protection
- Test planting of others kinds of tree on a reasonable small size
- Construction of processing plant.
- Develop infrastructure to support main and secondary production.
- b) Forest composition, especially for the production forests (yielding forest products):

The breakdown of the utilization of the concession is as bellow.

Area Statement (M	aster plan V7.3)
Grandis Conservation	983.03
Roads	91.39
Gravel Pit	24.88
Nursery	18.98
Villager's Land	4.42
Planted Productive	3699.7
Awaiting replant	1072.9
Temporary unplanted	23.87
Future Development	1878.5
Cattle Area	98.44
Total	7896.11



Productive planted species	Area (ha)	Harvesting cycle (years)
teak	3309	20/30
Acacia mangium X auriculoformis	289	8/10
Eucalyptus camadulensis X pelita	66	8/10
Mahogany (kaya senegalensis)	31	22/25
Other species (native)	5	na





c) Silvicultural and/or other management, including harvesting techniques:

The Planting Operations for the Teak are following different stages:

- Land preparation
  - Harvesting of non-commercial forest products if available;
  - Removal of brush and woody material;
  - Contour development to prevent erosion
  - Rectification of soil fertility through the utilisation of secondary fertilized or unfertilized crops and intensive grazing
  - Ripping on the plant line after soil fertility rectification;
- Planting
  - High quality clonal planting material is planted in the rip lines on the developed planting site at a density of approximately 1,300 trees per hectare.
- Weed Control through the following:
  - Mechanical removal (pulling, mulching or slashing);
  - Herbicide spraying;
  - Cover crops.
  - o Cattle grazing.
- Thinning and harvesting: Thinning will be done in 3 operations, the first of which is to waste and the second and third for production. While the timings and target stockings will be more closely defined depending on growth rates, in general the following prescription will be used;
  - T1 Thin to Waste to 850 stems per hectare at age 5
  - o T2 Thin for production to 650 stems per hectare at age 10
  - o T3 Thin for production to 400 stems per hectare at age 16
  - Final harvest will be conducted in the 25th to 30th year dependent on growth rates and market conditions.

d)	Brie	frational for species selection according to management plan:
		Naturally occurring species (in native forests)
		Management of existing species/stand composition and/or shift to naturally occurring species (in semi natural forests and mixed semi natural forests and native forests).
	$\boxtimes$	Plantation species: See FSC P&C 10.4 in chapter 9 "Results of the audit"
		Others, namely: TEXT
e)	Des	cription of the management concept for the production of NTFPs:
	$\boxtimes$	Not applicable
f)	Des	cription of the strategies aimed at enhancing and maintaining the functions of the forests:
		Integrated forest management with protection of water resources, soil protection, species diversity and others without special activities.
		Others, namely: TEXT

g) Environmental safeguards:

The company focuses on the following environmental safeguards:

- Protect conservation areas and buffer zones along water courses (30 meters from the edge of the water way) and creation of corridors for biodiversity for 983.03 ha). This area was increased (686 ha mapped in 2011).
- Conserve smaller plots of natural vegetation within plantation area (e.g. rocky areas, small hills, wet areas, poor soil areas). In 2018, this area represents 248 ha.
- Incorporate biomass (weeds, leaves, branches) into the soil by ploughing.
- Enrich conservation areas with native species which have been exploited smallholder farmers and today at a very low density (*Swietenia macrophylla, Afzelia xylocarpa, Dalbergia cochinchinensis*)



- Diversify plantation areas by planting species other than teak, acacia and eucalyptus in smaller quantities (Khaya senegalensis)
- Prohibiting hunting and fishing within the concession area.

Grandis Timber limited has defined an internal Environmental Policy (POL 9009) V 22/03/2013 based on specified procedure

- Conservation Area and Riparian Zone Plan SOP 4021
- Erosion Control Plan SOP 3019
- Herbicide Application SOP 3007/3012
- Waste Disposal SOP 4011
- Water Management SOP 3022
- Environmental Indicator Evaluation Monitoring and Reporting SOP 4019
- h) Management strategy for the identification and protection of rare, threatened and endangered species:

In 2010 Grandis Timber Ltd. carried out a profound environmental and social impact study. In 2018, a survey (Camera trapping biodiversity survey - final rapport Vanessa Herranz Muñoz, Biodiversity Consultant - 2018) conclude that there is no Rare, Threatened and Endangered Species within the FMU (at least for mammals and birds).

- i) Management strategy for the identification and maintenance of High Conservation Values: See FSC P&C 9.1, Chapter "Findings by Principle and Criteria (Main evaluation)
- j) The certificate holder's procedures for calculating the AAC, including inventory methods, data sources:

No applicable: No harvest activities at the moment and for the next 5 years.

The	certificate holder's procedures for calculating the AAC, including inventory methods, data sources
	Inventory data
$\boxtimes$	Permanent sample plots
$\boxtimes$	Yield tables
	Others:

k) Procedures for monitoring growth, yield and forest dynamics (incl. changes in flora and fauna), environmental and social impacts, and costs, productivity and efficiency:

Grandis timber Ltd is leading an important research development program based and permanent plots (43 ha) to monitor growth rate of different species in different situation (different technical plantation draw crossed by types of soil). SOP 3025 Permanent Sample Plots (10-02-2015).

From November to January 2018 (first campaign), Grandis Timber Ltd has developed a "sentinel site protocol" in order to obtain detailed information on biophysical variables, particularly land cover. A total of 12 sentinel sites were selected randomly throughout the concession. The collected data are: land cover type, signs and type of disturbance, percentage plant cover and wildlife signs.

I) Annual harvest by main commercial species (estimate), including NTFP:

Species (scientific name)	Sustainable yield (AAC) in m³	Actual annual harvest in m <sup>3</sup>
No applicable, no harvesting		

			narvest in m
	No applicable, no harvesting		
m)	List of all chemical pesticides used within the	forest area and reason for their use:	
	No pesticides used.		



Name of pesticide	Reason for application	Applied quantity (in kg/ha or l/ha)	Frequency of use
Glyphosate (C3H8NO5P) (5l/bottle)	Herbicide	554 ha treated in 2018	<ul><li>□ permanent</li><li>⊠ occasional</li></ul>
Imidacloprid (1drumx5lite)(C9H10CIN5O2) (5l/bottle)	Insecticide against the Teak Skeletonizer, <i>Eutectona</i> machaeralis	502 ha treated in 2018	☐ permanent ⊠occasional

NB: The iminacloprid is in FSC® List of 'highly hazardous' pesticides FSC-STD-30-001a EN Last updated: 3 April 2017 BUT in bold, italic and green that currently "do not require a valid derogation for their use".

The company's Master Plan describes pest management in detail as also the POLICY 9005 – "Integrated Weed, Pest & Disease Management V 1-4-2013)" and SOP 3019 - Pest and Disease Attack (06-06-2017)

### 3.4 Group Certification Information (only groups)

Not applicable.

### 4 Changes since last evaluation.

#### 4.1 Changes of scope

Description of changes since last audit in accordance to FSC-STD-20-007-a (Chapters "Scope of Certification", "Description of the area under the scope of certification" and Forest operation in main evaluation audit report):

No changes since the last audit.

#### 4.2 Accidents in forest work since the last audit

No serious/ fatal accidents occurred.

### 4.3 Use of pesticides since the last audit

See 3.3 m)

### 5 Evaluation process (Pre-evaluation)

Not applicable in recertification audit report.

## 6 Evaluation process (Main evaluation)

#### 6.1 Standards used

See Section "Certificate" on the front page of this report.

A description of the adaptation process is included in the introduction part of applicable GFA Generic FM Standard available under www.gfa-cert.com. The National FSC Standards can be obtained from the websites of the responsible National FSC Initiative.

#### 6.2 Sampling and Field Audit

#### 6.2.1 List of selected FMUs for evaluation

According to the procedures for sampling as stated in the GFA Auditor Handbook and according to FSC-STD-20-007 the following FMUs have been selected for field visits:

List of selected FMUs:

 $\square$  All



## 6.2.2 Overall schedule with dates (for each FMU)

Date	Location	Thematic priorities of on-site audits	Remarks/Participants
23/04/2018	Vkiririom	<ul> <li>Opening meeting</li> <li>Presentation of auditors and GT</li> <li>key management staff</li> <li>Detailed planning of surveillance</li> <li>Document review</li> <li>Audit schedule and logistic organization</li> <li>Closing of CARs</li> </ul>	Eugene Kraam Winkel : CEO Grandis Timber     Lina Hong : Sustainability officer     Neak Phearoom: Government and community relations manager (GCRM)     Ros Phoura; developpement forester     Yung Vantha : site manager     Cheat Vichet : Management forester     Nith Chhin : Local Auditor     Nicolas Perthuisot : Lead Auditor
	Grandis Timber field office	<ul> <li>Detail field visit organization</li> <li>Document review Forest management plan (P7)</li> </ul>	•
	Forest plantation	<ul> <li>Nursery 1 closed</li> <li>Security check point (P8)</li> <li>New forest road and water crossing (P6)</li> <li>Teak plantation (plot C2101, C1802, C2007, C2502)</li> <li>Sugar cane (plot E0603)</li> <li>Clearing activities (plot B0301, plot B0101)</li> </ul>	<ul> <li>Manager staff</li> <li>Meas Phorn (security guard)</li> </ul>
	Conservation area and non-planted area	<ul> <li>Grandis timber area and government area)</li> <li>Environmental survey and biodiversity aspects and monitoring, (P6, P8), HCFV (P9).</li> </ul>	
24/04/2018	Meeting with laborers	<ul> <li>Labor condition, Payment, Health, Working contract, work trainings</li> <li>Relationship with Grandis</li> <li>Conflict incident:</li> </ul>	Ms Min Khim (Daily Labor)     Ms Chan Sokha (Daily Labor)     Mr. Chuor Limol (Team Leader of Daily Labours)
	Nursery n° 2	Nursery management and monitoring     Chemical product use (P10)	Manager staff
	Worker camp visit:	<ul> <li>Kitchen, canteen, employee housing and restroom.</li> <li>Water treatment plant,</li> <li>Live hood condition for employees and families (P4)</li> </ul>	Manager staff
	Mechanical work- shop	Mechanical workshop, fuel station and tanks, Storage of spare parts and small equipment  Environnemental management and pollution control, waste managment (P6).	Manager staff
	Meeting with forest administration	Relationship b/b Commune and Firm     Relationship b/b people and Firm	Mr. Cheang Tola Director of PDAFF, K/S (MAFF) Mr. Lang Aun (Chief of Phnom Srouch Triage (FA) Mr. Sen Soeun Deputy chief of Triage (FA)
		Meeting with Raksmey Samaki commune peo- ple	Mr. Yoeung Tean: Samaki Commune Chief Mr. Phorn Torn: First Deputy Chief Mr. Chea Aun: Second Deputy Chief Mr. Svay Ly: Commune council member Mr. Un Samoeun: Vice Post Chief of Police Mr. Long Sophal: Pos Veik Village leader
25/04/2018	Meeting with local communities	Meeting with Krang Dey Way commune people at commune Office	Mr. Man Men : Krain Deyvey Commune Chief Mr. Bo Sambath Member of Commune Po- lice Post Ms. Suos Sokhchea : Commune member
		Meeting with village chiefs at Pagoda on 25-04- 2018	Mr. Thay Kheng: Prey Tortung Village Chief Mr. Suos Thouen: Daung Village Chief Mr. Hoeung Chorn: Prey Kahiech Village Chief
		Meeting with people/households living within Grandis ELC	Ms. Chum Sy Mr. Lim Horm Mr. Thon Theang (Former Grandis Labour) Ms Yong Than Grandis Laborer



ticipants
: CEO Grandis lity officer rmment and com- ger (GCRM) ement forester nager ment forester itor ad Auditor

During the evaluation both field and office visits were arranged. Visited stands/ forest areas were selected by the audit team in cooperation with the forest management. Compliance with FSC P&C was assessed and discussed with these examples.

Observations presenting evidence of compliance or non-compliance at the level of indicators are presented in the form of a standardized checklist, attached in the annex of this report.

### 6.2.3 Total of man-days required for the audit

	Pre-evaluation	Main audit
Stakeholder consultation		0.75
Document review		0.75
Field Audit		9
Report preparation		1.75
TOTAL (in working days)		12.25

#### 6.2.4 Surveillance audit plan for the Forest Management Enterprise

Audit type	Date of evaluation	Audit duration in days	Sites/ Member FMU	Main focus
recertification audit	2018/ 04	12.25	all	Detailed document and field check of compliance of forest management operations with applicable FSC standards
Surveillance 1	2019/ 04	11.10	all	
Surveillance 2	2020/ 04h	11.10	all	
Surveillance 3	2021/04	11.10	all	
Surveillance 4	2022 / 04	11.10	all	

### 6.3 Consultation with stakeholders during the audit

At least six weeks prior to the audit a consultation of stakeholders was carried out by GFA. The relevant persons, institutions and authorities were asked in written form for comments. The list of the stakeholders contacted is attached in the annex. During the audit, stakeholders may also be contacted and interviewed by the audit team.

Quantitative summary of stakeholder consultation:

Number of stakeholders contacted prior to the audit in written form:

Number of replies from stakeholders received (in total):

Number of replies with comments received: 0

Number of stakeholders interviewed before and during the audit orally: 07

Relevant comments towards compliance or non-compliance with the requirements of the FSC Standard as a result of the stakeholder consultation, as well as further information, are summarized in the matrix below:



Principles & Criteria	Stakeholder Comments	Answers
Principle 1	No comments	
Principle 2	No comments	
Principle 3	No comments	
Principle 4	No comments	
Principle 5	No comments	
Principle 6	No comments	
Principle 7	No comments	
Principle 8	No comments	
Principle 9	No comments	
Principle 10	No comments /	

## 7 Evaluation process (Surveillance audits)

Not applicable in recertification audit report.

### 8 Results of the pre-evaluation

Not applicable in recertification audit report.

### 9 Results of the audit

### 9.1 Findings based on the Principles and Criteria of FSC (Main evaluation)

The evaluation of forest management enterprises are based on indicators. Each identified non-compliance results in a Corrective Action Request (See also chapter "Corrective Action Requests (CARs)"). The table below presents the summarized findings by FSC Criteria and an indication whether or not the observed level of performance is considered to comply with the requirements of the standards.

In case of group certification, the findings refer to all evaluated FMUs unless specified otherwise.

[Only regular reports: delete for public summary!]

A detailed listing of the findings of the audit and field visits on indicator level can be found in the check-list(s) included in the Annex to this report.

Principles and Cri	teria	Result / CARs
Principle #1: Compliance with laws and FSC Princi	ples	Pass
Forest management shall respect all national and ments.	local laws and administrative require-	Pass
All applicable and legally prescribed fees, royalties paid.	s, taxes and other charges shall be	Pass
1.3 The provisions of all binding international agreement Biological Diversity, shall be respected.	ents such as CITES and Convention on	Pass
1.4 Conflicts between laws, regulations and the FSC I ated for the purposes of certification, on a case by volved or affected parties.		Pass
Forest management areas should be protected fro other unauthorized activities.	m illegal harvesting, settlement and	Pass
Forest managers shall demonstrate a long-term or ples and Criteria.	ommitment to adhere to the FSC Princi-	Pass
Principle #2: Tenure and use rights and responsibilities		Pass
2.1 Clear evidence of long-term forest use rights to the or lease agreements) shall be demonstrated.	ne land (e.g. land title, customary rights,	Pass



2.2	Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.	Pass
2.3	Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights.	Pass
Prin	Pass	
3.1	Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.	Pass
3.2	Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	Pass
3.3	Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	Pass
3.4	Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations.	Pass
Prin	ciple #4: Community relations and worker's rights	Pass
4.1	The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	Pass
4.2	Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.	Pass
4.3	The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).	Pass
4.4	Management planning and operations shall incorporate the results of evaluations of social impact.	Pass
4.5	Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples.	Pass
Prin	ciple #5: Benefits from the forest	Pass
5.1	Forest management (FM) should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.	Pass
5.2	FM and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	Pass
5.3	FM should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	Pass
5.4	FM should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	Pass
5.5	FM operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.	Pass
5.6	The rate of harvest of forest products shall not exceed levels which can be permanently sustained.	Pass
Prin	ciple #6: Environmental impact	Pass
6.1	Assessment of environmental impacts shall be completed appropriate to the scale, intensity of FM and the uniqueness of the affected resources and adequately integrated into management systems.	Pass Minor CAR 2018-01
6.2	Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established.	Pass
6.3	Ecological functions and values shall be maintained intact, enhanced, or restored, including Forest regeneration and succession, Genetic, species, and ecosystem diversity, Natural cycles that affect the productivity of the forest ecosystem.	Pass



6.4	Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps.	Pass
6.5	Written guidelines shall be prepared and implemented to: control erosion; minimize forest damage during harvesting, road construction; and protect water resources.	Pass
6.6	Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides.	Pass
6.7	Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner.	Pass
6.8	Use of biological control agents shall be documented, minimized, monitored and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	Pass
6.9	The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	Pass
6.10	Forest conversion to plantations or non-forest land uses shall not occur, except if it entails a very limited portion of the forest management unit; and does not occur on high conservation value forest areas; and will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit.	Pass
Princ	iple #7: Management plan	Pass
7.1	The management plan and supporting documents shall provide  a) Management objectives.	Pass
	b) Description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.	
	<ul> <li>Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.</li> </ul>	
	d) Rationale for rate of annual harvest and species selection.	
	e) Provisions for monitoring of forest growth and dynamics.	
	f) Environmental safeguards based on environmental assessments.	
	g) Plans for the identification and protection of rare, threatened and endangered species.	
	h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.	
	i) Description and justification of harvesting techniques and equipment to be used.	
7.2	The management plan shall be periodically revised to incorporate the results of monitoring or new scientific information.	Pass
7.3	Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan.	Pass
7.4	While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1	Pass
Princ	iple #8: Monitoring and assessment	Pass
8.1	The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations as well as the relative complexity and fragility of the affected environment.	Pass Minor CAR 2018- 02
8.2	FM should include the research and data collection needed to monitor, at a minimum, the following indicators:  a) Yield of all forest products harvested. b) Growth rates, regeneration and condition of the forest. c) Composition and observed changes in the flora and fauna. d) Environmental and social impacts of harvesting and other operations. e) Costs, productivity, and efficiency of forest management.	Pass
8.3	Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	Pass
8.4	The results of monitoring shall be incorporated into the implementation and revision of the management plan.	Pass



8.5	While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators.	Pass
Princ	Pass	
9.1	Assessment to determine the presence of the attributes consistent with HCV will be completed.	Pass
9.2	The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	Pass
9.3	The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach.	Pass
9.4	Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	Pass
Princ	ciple #10: Plantations	Pass
10.1	The management objectives of the plantation, including natural forest conservation and restoration objectives, shall be explicitly stated in the management plan.	Pass
10.2	The design and layout of plantations should promote the protection, restoration and conservation of natural forests, and not increase pressures on natural forests.	Pass
10.3	Diversity in the composition of plantations is preferred, so as to enhance economic, ecological and social stability.	Pass
10.4	The selection of species for planting shall be based on their overall suitability for the site and their appropriateness to the management objectives.	Pass
10.5	A proportion of the overall forest management area, appropriate to the scale of the plantation and to be determined in regional standards, shall be managed so as to restore the site to a natural forest cover.	Pass Minor CAR 2018-03
10.6	Measures shall be taken to maintain or improve soil structure, fertility, and biological activity.	Pass
10.7	Measures shall be taken to prevent and minimize outbreaks of pests, diseases, fire and invasive plant introductions. Integrated pest management shall form an essential part of the management plan, with primary reliance on prevention and biological control methods rather than chemical pesticides and fertilizers.	Pass
10.8	Monitoring of plantations shall include regular assessment of potential on-site and off-site ecological and social impacts, in addition to those elements addressed in principles 8, 6 and 4. No species should be planted on a large scale until local trials and/or experience have shown that they are ecologically well-adapted to the site, are not invasive, and do not have significant negative ecological impacts on other ecosystems.	Pass
10.9	Plantations established in areas converted from natural forests after November 1994 normally shall not qualify for certification.	Pass

### 9.2 Occurred difficulties during assessment

Description of issues that were hard to assess, for example, because of contradictory evidence or difficulty in interpreting the standard(s) in the field, and explanation of the conclusion reached:

### 9.3 Chain of Custody

### 9.3.1 Integrated processing or trading activities

Integrated processing or trading associated with the forest management enterprise must be inspected for compliance with the appropriate COC standard with a separate report required.

Inte	grated processing facilities or trading activities of wood from other sources are included in the scope:
	Yes, see separate COC report in Annex.
	No

				GFA
9.3.2	Tracking, tracing and ide	entification of certified products		
	ings and/ or transported might be possible. This	rnal chain-of-custody (COC) is necest dover longer distances, where a mi- applies especially in cases, where no cluded in the scope of certification (scion").	ix with products from	m non-certified sources in which the certificate
	No harvesting activity, n	o sale of FSC certified wood		
9.3.3	Balance of sold FSC pro	oducts		
	Products sold with FSC	Claim (only recertification and survei	llance audits):	
	Yes	⊠ No		
		ace of sold products specifying produ agement enterprise. In case of grou		
	Yes	☐ No, see "Corrective Action	n Requests".	
	Overview on products sold as FSC certified since the last audit			
	Overview on products so	old as FSC certified since the last aud	dit	
	Overview on products se	old as FSC certified since the last aud Species (scientific name)	Amount in m³	Comments
				Comments
9.3.4	Product Type (Nr.)* W1.1 Invoicing for FSC certification. The following elements a	Species (scientific name)  No sale of FSC certified wood  ed products  are included in all trading documents	Amount in m³	C certified material sold
9.3.4	Product Type (Nr.)* W1.1 Invoicing for FSC certified The following elements a as FSC certified and thu	Species (scientific name)  No sale of FSC certified wood  ed products  are included in all trading documents is in compliance with the applicable F	Amount in m³	C certified material sold
9.3.4	Product Type (Nr.)* W1.1  Invoicing for FSC certified The following elements a as FSC certified and thus Certificate registration compared.	Species (scientific name)  No sale of FSC certified wood  ed products are included in all trading documents is in compliance with the applicable Fode (GFA-FM/COC-xxxxxx):	Amount in m³ having to do with FSFSC COC requirements	C certified material sold
9.3.4	Product Type (Nr.)* W1.1 Invoicing for FSC certified The following elements a as FSC certified and thu	Species (scientific name)  No sale of FSC certified wood  ed products  are included in all trading documents is in compliance with the applicable F	Amount in m³ having to do with FSFSC COC requirements	C certified material sold
9.3.4	Product Type (Nr.)* W1.1  Invoicing for FSC certified The following elements a as FSC certified and thu Certificate registration co	Species (scientific name)  No sale of FSC certified wood  ed products are included in all trading documents is in compliance with the applicable Fode (GFA-FM/COC-xxxxxx):	Amount in m³ having to do with FSFSC COC requirement	C certified material sold
9.3.4 <b>9.4</b>	Product Type (Nr.)* W1.1  Invoicing for FSC certifice The following elements as FSC certified and thus Certificate registration of Yes "FSC 100%" claim:	Species (scientific name)  No sale of FSC certified wood  ed products are included in all trading documents is in compliance with the applicable Fode (GFA-FM/COC-xxxxxx):  No, see "Corrective Action	Amount in m³ having to do with FSFSC COC requirement	C certified material sold
	Product Type (Nr.)*  W1.1  Invoicing for FSC certified The following elements as FSC certified and thus Certificate registration of Yes  "FSC 100%" claim: Yes  FSC trademark use The company shall subm	Species (scientific name)  No sale of FSC certified wood  ed products are included in all trading documents is in compliance with the applicable Fode (GFA-FM/COC-xxxxxx):  No, see "Corrective Action	Amount in m³  having to do with FSFSC COC requirement in Requests".  The Requests in Reque	Customer Service Portal
	Product Type (Nr.)*  W1.1  Invoicing for FSC certified The following elements as FSC certified and thus Certificate registration of Yes  "FSC 100%" claim: Yes  FSC trademark use The company shall subm	Species (scientific name)  No sale of FSC certified wood  ed products  are included in all trading documents is in compliance with the applicable Fode (GFA-FM/COC-xxxxxx):  No, see "Corrective Action No, see "Corrective Action it any planned FSC trademark use to trt.com for approval prior to publishing	Amount in m³  having to do with FSFSC COC requirement in Requests".  The Requests in Reque	Customer Service Portal
	Product Type (Nr.)* W1.1  Invoicing for FSC certified The following elements a as FSC certified and thu Certificate registration of Yes "FSC 100%" claim: Yes  FSC trademark use The company shall subravailable at www.gfa-ce	Species (scientific name)  No sale of FSC certified wood  ed products are included in all trading documents is in compliance with the applicable Fode (GFA-FM/COC-xxxxxx):  No, see "Corrective Action No, see "Corrective Action No, see "Corrective Action In the applicable Fode (GFA-FM/COC-xxxxxx):  No, see "Corrective Action No, see "Corrective	Amount in m³  having to do with FSFSC COC requirement in Requests".  The Requests in Reque	Customer Service Portal

☐ Invoices, delivery documents

Stationary

Business cards

Others:

All FSC trademark use complies with FSC trademark standards and all GFA trademark approvals are obtained and documented:

### 9.5 Forest enterprise strength and weaknesses

As main strength points for the forest enterprise / the group are recognized:

- Good capacity to dominate the core activity (management of plantation).
- Very good technical capacity of staff (young, motivation and good will, competency, solidarity, adaptability)
- Very good relationships with forest administration
- · Very good relationships with local communities



- The recent (or ongoing) implementation of particularly positive action
- o Process of boundaries poles installation
- o The new permit system to be implemented
- The training center under building

As main weaknesses for the forest enterprise / the group are recognized:

See chapter "Corrective Action Requests (CARs)" / "Identified non-compliances".

### 10 Identified non-compliances (Pre-evaluation)

Not applicable in recertification audit report.

### 11 Corrective Action Requests (CARs)

According to the importance of the non-compliances with respect to scale and intensity of the forest operation, the corrective action requests are classified as Minor or Major.

"Major Corrective Action Requests" (Major CARs) result from fundamental failures to achieve the objective of the relevant FSC requirements. Adequate corrective action needs to be implemented by the organization before a certificate can be issued or re-issued. If Major CARs are not complied with within the timeframe existing certificates shall be suspended according to the accredited FSC system.

"Minor Corrective Action Requests" (Minor CARs) result from failures to achieve the objective of the relevant FSC requirements which are not considered to be fundamental. They do not inhibit the issuing or re-issuing of the certificate but adequate corrective actions needs to be implemented until the next surveillance audit. Otherwise Minor CARs are upgraded to Major CARs automatically. Repeated disregard leads to a suspension of the certificate

"Observations" do not influence the status of the certificate but identify the early stages of a problem which does not of itself constitute a non-compliance, but which may lead to a future non-compliance if not addressed by the client.

In the case of Major CARs the organization has to send evidence of both corrective and preventive actions to the GFA certification department within the given timeframe. In addition the organization shall keep the evidence available on site for the next audit. In the case of Minor CARs the organization has to keep evidence of corrective actions available on site for the next audit.

### 11.1 CARs from previous audits

	Not applicable,	no previous	CARs open
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CAR#	2017-01			
Short Title	Legality of subcontractors			
Grade	☐ Major ☐ Minor			
Scope of CAR:		, resp. Group Entity		
	FM: Group member(s):	TEXT		
Normative Reference	☐ GFA Interim Standard for FM ☐ National FSC FM Standard ☐ FSC-STD-30-005, V.1.0 ☐ Other:  ☐ GFA Interim Standard for FM ☐ National FSC FM Standard ☐ Clause:  4.1.5		4.1.5	
Requirement acc. standard	The forest manager shall ensure that all employees, contractors and sub-contractors working in the forest of the certificate holder are paid a fair wage and other benefits, which meet or exceed all legal requirements and those provided in comparable occupations in the same region.		enefits,	
Description of identified non-conformity	Grandis timber can't provide that all subcontractors comply with all legal requirements in all circumstances  • Discussions with Mr Chy Vichet, manager of the Chy Vichet Tractor Company (working in plot C0106) show that 2/8 of driver, the 3 mechanic and the cooker (daily workers) didn't seem to have appropriated working contract.  • Grandis Timbers didn't have check/controlled the workers contract before the			



	The contract between Grandis timber and this sub-contractor (contract agreement for the provision of services 08/02/2016) is not detailed enough and do not include specific requirement for FSC (environmental and social issues).  The CAR is minor because for daily workers, writing contracts are not compulsory. Elsewhere the subcontractor provides to audit team by email before closing meeting the 3 social attestations of legality for 2016 (certificate of incorporation 03-11-2016 n° 0003264, certification of tax registration 02-02-2016 and patent tax 02-12-2016)
	☐ Until next audit, not later than 10/06/2018 (12 months after the last audit day)
Timeframe	☐ Before certificate issue
	☐ XX.XX.20XX
	Analysis and Actions (to be filled by the organization)
Root Cause Analysis	Grandis timber Ltd has got the system in place yet it is poorly managed
Corrective Actions	<ul> <li>According to the Cambodian Labor Law, writing contract for sub-contractor are not compulsory (Chapter 4, section I, article 67-6). However,</li> <li>the contract for sub-contractor has been made by contractor (Contract for tractor drivers and for mechanics)</li> <li>Induction form for Grandis's day labors has been established</li> <li>Indicator 4.1.5 of FSC standard has described and highlighted in the clause 5.13 of recent update contract for the contractor</li> </ul>
Preventive Actions	Internal inspection for contractor will be checked during activity
	Evaluation of Corrective Action (by GFA Certification)
Status	☐ CAR closed: Root Cause Analysis and Actions are appropriate.
Otatus	☐ CAR not closed: Root Cause Analysis and Actions are not appropriate.
Rationale and objective evidences revised	<ul> <li>See the 5 writing contract between Chy Vichet Tractor Company and its own workers (firm in November 2017)</li> <li>See the document "Induction for Casual Labour" clarifying the company obligation (section 1), the worker obligation (section 2) and the good understanding of the worker (section3)</li> <li>See the agreement for the provision of services Between Grandis Timber limited And Chy Vichet Tractor Co.,Ltd (01/02/2018)</li> </ul>

CAR #	2017-02			
Short Title	Safety requirement			
Grade	☐ Major ☑ Minor			
Scope of CAR:				
	☐ FM: Group member(s):	TEXT		
Normative Reference	GFA Interim Standard for FM National FSC FM Standard FSC-STD-30-005, V.1.0 Other:		4.2.3	
Requirement acc. standard	Safety training is carried out, relevant to	the tasks of workers	and the equipm	ent used.
Description of identified non-conformity	<ul> <li>Safety requirement are not fully implemented</li> <li>Fire extinguisher are not all controlled and checked by relevant organization (could be local administration or private company).</li> <li>Lake of strategy of training regarding safety issues</li> <li>The CAR is minor because no work injury, fire or accident have been occurred for 2 years.</li> </ul>			
	Until next audit, not later than 10/06/2018 (12 months after the last audit day)			
Timeframe	☐ Before certificate issue			
	☐ XX.XX.20XX			
	Analysis and Actions (to be filled by the organization)			
Root Cause Analysis	Legislation requires 2 years inspection of fire prevention system. It does not quantified the type of inspection which need to be carried out (Law on fire prevention and fighting 2013- Article 19)			



Corrective Actions	<ul> <li>Apply to local fire department to check fire extinguishers</li> <li>Diagnosis and repair of defective fire extinguishers. Installation at the appropriate height respecting safety standards.</li> <li>Firefighting and prevention training was taking place in November from 13 until 14, 2017</li> </ul>
Preventive Actions	Internal inspection will be regularly checked and reported to relevant task implementer for action taken
	Evaluation of Corrective Action (by GFA Certification)
Status	☐ CAR closed: Root Cause Analysis and Actions are appropriate.
Status	☐ CAR not closed: Root Cause Analysis and Actions are not appropriate.
Rationale and objective evidences revised	<ul> <li>See the maintenance report from the private company "Azisafe Agency" (report V1 from 16-02-2018 on Kampong Speu Site) where it is clearly noted that "the whole of 49 units fires extinguishers are considered to replace due to the poor conditions and passed expiration date".</li> <li>See the internal process to get quote from several companies. The budget for fire prevention in 2018 is 29500 \$, to be compare to 6000 \$ for 2017.</li> <li>See attendance list of Firefighting and prevention training session of 36 people (13 and 14 November 2017).</li> <li>See the GT Accident register (last version March 2018)</li> </ul>

CAR#	2017-03			
Short Title	Safety equipment			
Grade	☐ Major	Minor		
Scope of CAR:	M: FM: Forest Management Enterprise, resp. Group Entity			
•	☐ FM: Group member(s): TEXT			
Normative Reference	□ GFA Interim Standard for FM     □ National FSC FM Standard     □ FSC-STD-30-005, V.1.0     □ Other:	National FSC FM Standard FSC-STD-30-005, V.1.0 Clause: 4.2.4		4.2.4
Requirement acc. standard	Workers, including subcontractors, are p tasks of workers, the equipment used ar Safety and Health in Forestry.			
Description of identified non-conformity	<ul> <li>Safety equipment are not properly wearied by all workers during field activities</li> <li>Some daily workers in charge of pruning activities are not wearing at list, boots and gloves.</li> <li>Workers on forest are not equipped with fluorescent vest when they are working near forest road or near forest engine at work (tractors)</li> <li>Tractors drivers employed of "Chy Vichet Tractor Company" (subcontractor) are not equipped of all the necessary safety equipment (helmets and security shoes).</li> <li>Stock of safety equipment and storage are not properly monitored.</li> <li>The DAC remains minor because Grandis timber had done a first risk assessment (SOP 4013) but not for all the activities, including sub contracted activities.</li> <li>Workers exposed to main risk (chemical product user) are properly equipped.</li> <li>There is no work injuries occurrence in 2015 and 2016 (as confirmed by statistic and medical team). Until today, in absence of logging activities, the forest activities (planting, manual weeding and pruning) are not very dangerous.</li> <li>The safety equipment "strategy" has to fight against mentality and cultural aspects that require times and a long process of conscious understanding.</li> </ul>			
	Until next audit, not later than 10/06/2018 (12 months after the last audit day)			
Timeframe	☐ Before certificate issue		_	
	☐ XX.XX.20XX			
	Analysis and Actions (to be filled by the			
Root Cause Analysis	The company has got the system in place		-	_
Corrective Actions	<ul> <li>Operation risks including PPE have</li> </ul>	been currently modif	ied and validate	ed



	<ul> <li>Internal inspection form has been updated including regulate on stock system of the warehouse, safety equipment for plantation operating and contractor. The questions have addressed as follow:</li> <li>Warehouse         <ul> <li>Chemical and PPE list in stock are up to date?</li> </ul> </li> <li>Plantation operating         <ul> <li>Have workers been trained in regards with SOPs, QC, PPE and other daily basis tasks?</li> <li>Have PPE been worn?</li> </ul> </li> <li>Contractor         <ul> <li>Are information, training and instruction provided for using PPE?</li> <li>Is PPE provided to their workers?</li> <li>Do workers use PPE in accordance with the information, training, and instruction provided?</li> </ul> </li> </ul>	
Preventive Actions	Internal inspection and toolkit talk will be regularly inspected and carried out respectively	
Preventive Actions		
Preventive Actions		
	tively	
Status	Evaluation of Corrective Action (by GFA Certification)	
	tively  Evaluation of Corrective Action (by GFA Certification)  CAR closed: Root Cause Analysis and Actions are appropriate.	

CAR#	2017-04			
Short Title	Presence, within the FMU, of rare, endangered or threatened species and their habitats			
Grade	☐ Major ☐ Minor			
Scope of CAR:		, resp. Group Entity		
	☐ FM: Group member(s):	TEXT		
Normative Reference	□ GFA Interim Standard for FM     □ National FSC FM Standard     □ FSC-STD-30-005, V.1.0     □ Other:		Clause:	6.2.1
Requirement acc. standard	Rare, endangered or threatened species and their habitats (e.g. nesting and feeding areas) present or likely to be present are identified and mapped			
Rare, endangered or threatened species and their habitats (e.g. nesting and feedeas) present or likely to be present are identified and mapped  Grandis timber didn't have relevant information or actualized data to ensure that there is no species (fauna and flora) or habitat of interest.  • The initial environmental impact studies done in 2010 was poor quality considered that fishing cat ( <i>Prionailurus viverrinus</i> – EN and UICN red nex II Cites) is present in the concession which including at this mom 2259 ha of conservation area. There is no information detailed on his localization.  • Staff of company can also attest of presence of leopard cat ( <i>Prionailur galensis</i> - UICN Least Concern species List) and python ( <i>Malayopython latus</i> -Annex II Cites).  • No inventory of fauna or flora has been carried out. No study or survey had done regarding insects, chiropters or batrachians  • Description of vegetation formations of none planted area are very basic do not always correspond to the field reality (ex. Wetland)  The DAC remains minor because, in reality, all non-planted area are totally deforest with poor biodiversity interest. Elsewhere, the company maintains and new acts with all riparian and wetland area, rocky area and monotonous zone. The damage to biodiversity or interesting species is by the way very low.		ality but had red list, An- moment the his precise vailurus ben- ython reticu- ey has been basic and ly degraded never inter-		



	☐ Until next audit, not later than 10/06/2018 (12 months after the last audit day)			
Timeframe	☐ Before certificate issue			
	□ XX.XX.20XX			
Analysis and Actions (to be filled by the organization)				
Root Cause Analysis	Grandis has kept eyes on protection of wildlife on the conservation area. Grandis is in establishment and maintenance stage of the plantation. However, Grandis believed that our operation has operated in such way of environmental care because riparian, wetland, rocky area remain untouched			
Corrective Actions	Open areas have been recently identified in regards with vegetation description and significant biodiversity conservation Wildlife baseline assessment on the concession has been carried out by an expert from the NGO Conservation International (Consulting agreement on wildlife baseline on the concession) and a Camera Trapping Biodiversity Survey has been done.			
<b>Preventive Actions</b>	Biodiversity monitoring and management plan will be established according to significant species and habitat have been found			
	Evaluation of Corrective Action (by GFA Certification)			
Status	☐ CAR closed: Root Cause Analysis and Actions are appropriate.			
Status	☐ CAR not closed: Root Cause Analysis and Actions are not appropriate.			
Rationale and objective evidences revised	<ul> <li>CAR not closed: Root Cause Analysis and Actions are not appropriate.</li> <li>See the agreement (November 2017) between GTI and V. MUNOZ to conduct Wildlife baseline assessment on the concession.</li> <li>A drone monitoring campaign in January 2018 has been conducted and made it possible to better identify and map the open areas and wetlands that will be excluded from the plantation area (248 ha, which will be added to the existing 983.03 ha of conservation area))</li> <li>See final Camera trapping biodiversity survey report (methodology, analysis of camera trap data, map of biodiversity survey site at GT Ltd, discussion and recommendations). Main conclusions are:         <ul> <li>The biodiversity is generally low – 26 mammals species detected and 23 bird sightings (considered LC on UICN list).</li> <li>there is no Rare, Threatened and Endangered Species within the FMU (at least for mammals and birds)</li> <li>Even if hunting is forbidden, the poaching activity still remains (in the northern part of the concession)</li> <li>The rapport underline the importance of connectivity functions in the north (linked with conservation area) and the appropriate management of riparian area and corridors.</li> <li>The strategy regarding riparian, wetland, rocky area to remain untouched is good.</li> <li>Biodiversity survey shall be regularly implemented to accumulate data</li> </ul> </li> </ul>			

CAR #	2017-05			
Short Title	Soil pollution			
Grade	☐ Major			
Scope of CAR:	M: Forest Management Enterprise,	, resp. Group Entity		
	☐ FM: Group member(s):	TEXT		
Normative Reference	☐ GFA Interim Standard for FM ☐ National FSC FM Standard ☐ FSC-STD-30-005, V.1.0 ☐ Other:		Clause:	6.7.4
Requirement acc. standard	Soils and water are being protected from pollution.			
Description of identified non-conformity	Fuel management and storage procedure is not adequately implemented to limit risk run off and localized pollution on soil.  • Generator of nursery1 is not secured (the bund wall is open/destroyed) and the backup generator for security was outside of bund wall.			



	<ul> <li>In the temporary subcontractor forest camp, the fuel cans are just installed on a non-waterproof plastic cover without any efficiency to prevent micro pollution near the river.</li> <li>The field tank cart for field operation is not totally secured (no drip tray)</li> <li>There is no system for the treatment of accidental pollution at the garage and fuel station (no decanter system)</li> <li>The DAC remains minor because the pollutions observed are localized, with little environmental damages. The risk is limited.</li> </ul>
	☐ Until next audit, not later than 10/06/2018 (12 months after the last audit day)
Timeframe	☐ Before certificate issue
	□ XX.XX.20XX
	Analysis and Actions (to be filled by the organization)
Root Cause Analysis	The company has got the system in place yet it is poorly managed
Corrective Actions	<ul> <li>Fuel and chemical spill procedure have been currently described in standard operating procedure 4011 on Chemical and fuel storage and disposal management.</li> <li>In compliant with SOP 4011, the Internal inspection has checked on the contractor in regards with fuel and chemical</li> <li>The nursery 1 was closed</li> <li>A decanter system had been built.</li> </ul>
Preventive Actions	Internal inspection will be regularly undertook and reported non-conformity to responsible person
	Evaluation of Corrective Action (by GFA Certification)
Status	
Otatus	☐ CAR not closed: Root Cause Analysis and Actions are not appropriate.
Rationale and objective evidences revised	<ul> <li>See the updated Standard Operating Procedure 4011 on Chemical and fuel storage and disposal management</li> <li>Control during field audit visit:         <ul> <li>verification of the environmental compliance of the nursery 1 situation in agreement with the letter &amp; minute meeting attend to the landlord</li> <li>Verification of the environmental conformity of mechanical workshops (especially the construction of the decanter, its good functioning and its good maintenance).</li> </ul> </li> </ul>

CAR#	2017-06			
Short Title	Summary of management plan			
Grade	☐ Major			
Scope of CAR:		, resp. Group Entity		
	☐ FM: Group member(s):	TEXT		
Normative Reference	☐ GFA Interim Standard for FM ☐ National FSC FM Standard ☐ FSC-STD-30-005, V.1.0 ☐ Other:		Clause:	7.4.1
Requirement acc. standard	Regular summaries of the primary elements of the management plan, including those listed in Criterion 7.1 are available to the public. Large scale enterprises (> 10.000 ha) actively inform the public during regular stakeholder meetings (see 4.4.4)			
Description of identified non-conformity	<ul> <li>Summary of management plan is not publicly available.</li> <li>The summary of management plan including at list element of criterion 7.1 is not finalized.</li> <li>There is no indication on web site of company that specific information or data are publicly available</li> <li>The DAC remains minor because trough his new letters (twice a year), information regarding management and annual activity are communicated to all stakeholder.</li> </ul>			
Timeframe	Until next audit, not later than 10/06/2018 (12 months after the last audit day)			



	☐ Before certificate issue
	☐ XX.XX.20XX
	Analysis and Actions (to be filled by the organization)
Root Cause Analysis	Company website has been developed and went live in March 2017. The company does not have a communication person to update the website.
	Company realized that content of webpage is not adequate. To rectify this problem, the content have recently restructured (Annex A- Electronic communication on upgrading of the website)
Corrective Actions	Summary information of master plan will be available on the webpage in early May 2018. The amended investment contract was recently signed.  According to legislation, Grandis timber is forced to submit and amend Master plan for
	approval in Avril 2018.
Preventive Actions	<ul> <li>General manager corporate service has been instructed to make sure that the webpage is up to date</li> <li>Discussion points in monthly meeting</li> </ul>
	Evaluation of Corrective Action (by GFA Certification)
Status	☐ CAR closed: Root Cause Analysis and Actions are appropriate.
Status	☐ CAR not closed: Root Cause Analysis and Actions are not appropriate.
Rationale and objective evidences revised	The summary of management is already done (executive summary – part 1 of master Plan V 7.3).  Before being able to publicly publish the summary, the company must wait that the MAFF officially validates the Master Plan in May 2018. It is not possible for the company to escape from this legal obligation or to put pressure on the administration.

CAR#	2017-07			
Short Title	summaries of monitoring			
Grade	☐ Major	Minor		
Scope of CAR:		resp. Group Entity		
	☐ FM: Group member(s):	TEXT		
Normative Reference	☐ GFA Interim Standard for FM ☐ National FSC FM Standard ☐ FSC-STD-30-005, V.1.0 ☐ Other:		Clause:	8.5.1
Requirement acc. standard	Regular summaries of monitoring results and analysis by FMU are available to the public. Large scale enterprises (> 10.000 ha) actively inform the public during regular stakeholder meetings (see 4.4.4).			
Description of identified non-conformity	Regular summaries of monitoring results are not publicly available.  Periodic (annual) summary of activity are not available  There is no indication on web site of company that specific information or data are publicly available  The DAC remains minor because trough his new letters (twice a year), information regarding management and annual activity are communicated to all stakeholder. The company must prepare also every 3 months an activity report for the forestry administration which contain some elements.			
	Until next audit, not later than 10/06/2018 (12 months after the last audit day)			
Timeframe	☐ Before certificate issue			
	☐ XX.XX.20XX			
	Analysis and Actions (to be filled by the	e organization)		
Root Cause Analysis	Company website has been developed and went live in March 2017. The company does not have a communication person to update the website			
Corrective Actions	Monitoring report has uploaded in company's webpage including report as follow:  - Wildlife baseline report by conservation international  - Internal progress report on conservation matters  - Quarterly report and annual report to MAFF and MoE			



	- Annual conservation report of 2017	
	- Annual FSC audit report	
Preventive Actions	General manager corporate service has been instructed to make sure that the webpage is up to date	
	Discussion points in monthly meeting	
Evaluation of Corrective Action (by GFA Certification)		
01.1	☐ CAR closed: Root Cause Analysis and Actions are appropriate.	
Status	CAR not closed: Root Cause Analysis and Actions are not appropriate.	
Rationale and objective evidences revised	See the company website-www.grandistimber.com (These reports under the content of "sustainability, sub-content "Policies & Report). The information is clearly available.  The MAFF annual report gives the mains data (land property, land use and surface distribution, annual forest operation and harvesting, infrastructure, manpower, conflict and incidents, main requests).	

<b>-</b>	T			
CAR#	2017-08			
Short Title	Restoration of part of an appropriate proportion ofFMU to natural forest cover			
Grade	☐ Major	Minor		
Scope of CAR:		resp. Group Entity		
	☐ FM: Group member(s):	TEXT		
Normative Reference	☐ GFA Interim Standard for FM ☐ National FSC FM Standard ☐ FSC-STD-30-005, V.1.0 ☐ Other:		Clause:	10.5.1
Requirement acc. standard	An appropriate proportion (in general 5 – is managed so as to restore the site to a i		orest managem	ent area
Description of identified non-conformity	The program of native species plantation is not put in place and since 2012. Only 1ha of native species has been planted.  The DAC remains minor because the company still shear competence to produce native species planting and maintain agreement with local people to collect seeds from rose wood ( <i>dalbergia cochinchinensis</i> ) and red wood ( <i>pterocarpus macrocarpus</i> ).  Moreover there is no specific quantitative obligation in the Master Plan relative to native species plantation.			
	☐ Until next audit, not later than 10/06/2018 (12 months after the last audit day)			
Timeframe	☐ Before certificate issue			
	☐ XX.XX.20XX			
	Analysis and Actions (to be filled by the organization)			
Root Cause Analysis	Grandis timber limited currently growth phase and therefore there are a huge amount of pressures on current resources including nursery capacity, labor force. Forest management did not deem the cultivation of native species as crucial to reaching government impose target.			
Corrective Actions	<ul> <li>An area close to the nursery have been identified as suitable for planting native species.</li> <li>Native species seeds have been collected from the conservation area. The nursery manager is in the process of germinating these seeds</li> <li>Degraded riparian forest will be identified for future rehabilitation through planting of native species</li> </ul>			
Preventive Actions	Non applicable			
	Evaluation of Corrective Action (by GFA	A Certification)		
Status	☐ CAR closed: Root Cause Analysis and Actions are appropriate.			
Otatus	☐ CAR not closed: Root Cause Analysis and Actions are not appropriate.			
Rationale and objective evidences revised	See during field audit visit: 8000 plants are available in the nursery n° 2 ( <i>Switenia macrophylla, Afzelia xylocarpa, Dalbergia cochinchinensis</i> ) and will be planted before end of august 2018.  The compartment are yet identified (D2111 for 5.6 ha)			



The new version of Master Plan V7.3 plans to plant natural species (§ 5.3.1.1.3) "Mountainous areas with biodiversity value or which could not be developed on an economically viable method, will excised to be kept as a natural restoration area. These areas could be utilized for natural species in planting or testing".  Total of Grandis timber Itd conservation area is 983 ha + 248 ha of open area. This area must be compared to the total area of concession and is representing 15,6 % in 2018

## 11.2 CARs identified during the evaluation

☐ Not applicable, no CARs identified.

### 11.2.1 Major CARs

Not applicable, no major CARs identified during the audit.

### 11.2.2 Minor CARs

CAR #	2018-01			
Short Title	Environmental assessment.			
Grade	☐ Major	Minor		
Scope of CAR:		resp. Group Entity		
	☐ FM: Group member(s):	TEXT		
Normative Reference	□ GFA Interim Standard for FM     □ National FSC FM Standard     □ FSC-STD-30-005, V.1.0     □ Other:	<b>Clause:</b> 6.1.1		
Requirement acc. standard	A system assessing environmental impacts appropriate to the scale and intensity of forest management, and the uniqueness of the affected resources is being implemented and documented prior to the start of any operation			
Description of identified non-conformity	<ul> <li>The system assessing environmental impact was not properly applied in certain situations</li> <li>For the new road construction (northern part on concession B101, B301, B401) – the Environmental Risk Quantifying (SOP 4019) has not be fully implemented</li> <li>The SOP 3031 – "Road Construction and Maintenance" does not consider bridge construction and water crossing;</li> <li>The company can't prove that it had implemented all the mitigation measures (avoiding and reduction) to limit impacts</li> <li>The CAR remains minor because Grandis Timber Itd has a good experience and competence for road building and water crossing (a lot of example of very well done water crossing had been seen during 2017 and 2018 field visit). Moreover the visible impacts on site was minimized.</li> </ul>			
	Until next audit, not later than 26/04/2	2019 (12 months after	the last audit o	lay)
Timeframe	☐ Before certificate issue			
	☐ XX.XX.20XX			
	Analysis and Actions (to be filled by the	e organization)		
Root Cause Analysis				
Corrective Actions				
Preventive Actions				
	Evaluation of Corrective Action (by GFA	•		
Status	☐ CAR closed: Root Cause Analysis and Actions are appropriate.			
Julius	☐ CAR not closed: Root Cause Analysi	s and Actions are not	appropriate.	
Rationale and objective evidences revised	TEXT			



CAR#	2018-02			
Short Title	Monitoring process			
Grade	☐ Major			
Scope of CAR:		resp. Group Entity		
	☐ FM: Group member(s):	TEXT		
Normative Reference	□ GFA Interim Standard for FM     □ National FSC FM Standard     □ FSC-STD-30-005, V.1.0     □ Other:		Clause:	8.1.2
Requirement acc. standard	A plan and design, based upon consistent plemented for periodic monitoring and rep		dures exists an	d is im-
Description of identified non-conformity  Timeframe	The company does not have a general protoring system to allow comparison of results he company shares a very efficient operategister) but  • From all the data generated by the most relevant information's/parategraphy analyzed in order to give information public (to provide a better public management, ecological and soccession endors and tendencies.  • Monitoring system does not considered to company cannot provide fluently heavily in evolutions and tendencies.  The CAR remains minor because Quality and ensure the control of field quality opment. Elsewhere, the Data base exists, and presentation.    Until next audit, not later than 26/04/2.	lts and assessment of ational monitoring system, the Companimeters/indicators to be ation to General Direct summary of monitoring id (internal/external) are a "master monitoring instorical data / informore a control mechanism are a question and the companion is more a question and it is more a question.	f change tem (POLICY, Some period of the control of	tify the d to be of the efforest of evaluate as efficient C require-
	☐ XX.XX.20XX			
	Analysis and Actions (to be filled by the organization)			
Root Cause Analysis				
Corrective Actions				
Preventive Actions	Evaluation of Corrective Action (by GFA	\ Cortification\		
		· · · · · · · · · · · · · · · · · · ·	-:-4-	
Status	CAR closed: Root Cause Analysis an	• • • •		
Rationale and objective ev-	CAR not closed: Root Cause Analysis and Actions are not appropriate.			
idences revised	TEXT			
CAR#	2018-03			
Short Title	Monitoring process			
Grade	☐ Major	Minor		
Scope of CAR:	FM: Forest Management Enterprise,	resp. Group Entity		
	FM: Group member(s):	TEXT		
Normative Reference	☐ GFA Interim Standard for FM☐ National FSC FM Standard☐ FSC-STD-30-005, V.1.0☐ Other:		Clause:	10.5.2
Requirement acc. standard	A documented strategy (as part of the ma a natural forest is available and being imp		e area to be re	stored to



Description of identified non-conformity	Documented strategy relative to natural species plantation and restoration in not available. The company does not have a medium long term program for native species plantation that incorporates, for example, objectives in terms of area planted per year, a prioritization of areas of action, monitoring and evaluation rules and a budget.  The CAR remains minor because the process/dynamic of natural species production in nursery is yet engaged and first experience is in capitalisation process  There is more than 15% of natural forest within the Concession.		
	☐ Until next audit, not later than 26/04/2019 (12 months after the last audit day)		
Timeframe	☐ Before certificate issue		
	☐ XX.XX.20XX		
	Analysis and Actions (to be filled by the organization)		
Root Cause Analysis			
Corrective Actions			
Preventive Actions			
	Evaluation of Corrective Action (by GFA Certification)		
Status	CAR closed: Root Cause Analysis and Actions are appropriate.		
	☐ CAR not closed: Root Cause Analysis and Actions are not appropriate.		
Rationale and objective evidences revised	TEXT		

#### 11.2.3 Observations

■ Not applicable, no observations.

Observations	Description
Observation 2018-1	The stakeholder list is not totally updated and was not maintain using a proactive contact process
Observation 2018-2	Exotic natural regeneration species (Acacia but also teak and eucalyptus with less emergency) is not yet enough considered in order to limit future risks (not the case today, except very restricted zones (ex : new trench (F1001)
Observation 2018-3	Corporate Social Responsibility (CSR) strategy and CSR activity plan is not fully updated
Observation 2018-4	The strategy for upgrading biodiversity knowledge has to be maintained by using camera trap in the interesting habitats (some wetland for example) or using other survey tools adapted to fauna (amphibian, bats, insects) or flora
Observation 2018-5	The communication with local authorities is not fully fluent and frequent enough to identify and evaluate the request made and the interest of some local project of facilities (sanitary project of Raksmey Samaki commune remains unresponded

## 12 Summary and further procedure (Pre-evaluation)

Not applicable in recertification audit report.

### 13 Certification decision.

### 13.1 Summary of audit

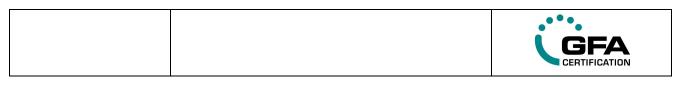
In the context of the audit three (3) Minor CARs were identified and five (5) Observations were issued.

### 13.2 Certification recommendation by the auditor(s)

The certificate holder's system of management, if implemented as described, is capable of ensuring that all of the requirements of the applicable standard(s) are met over the whole forest area covered by the scope of the evaluation:

$\boxtimes$	A certificate can be issued/reissued/maintained under the condition that the "Corrective Action Re-
	quests" mentioned above will be completely fulfilled in the indicated timeframe.

A certificate can only be issued when all identified Major CARs mentioned above are closed due to
implemented corrective actions.



Ш	The FM system of the evaluated enterprise does not comply with the provisions and standards of
	FSC and those of GFA Certification GmbH. Due to the number of identified major non-conformities
	the auditors recommend the immediate suspension of the certificate after finalization of the report.

The next surveillance audit is preliminarily planned for spring 2019.

### 14 Agreements

Between GFA and the client it is hereby agreed, that the report will be sent to the client for review and comments. If the client does not send a comment within 21 days (date of post stamp), GFA will assume, that no comments will be made and that the client agrees to the report.

If any non-conformity (CAR) has been noticed during the audit, the identified root cause(s) and selected corrective and preventive action as well as objective evidences for their implementation for each CAR shall be documented by utilization of the separate GFA CAR response form. The form shall only be submitted as digital file via email to GFA (info@gfa-cert.com) if the next audit is not carried out within the timeframe of the CAR (applicable to all Major CARs and due Minor CARs). Objective evidence for each of the implemented actions shall be submitted as attachment.

If the audit is carried out within the timeframe of the CARs, the CAR response form and all attachments can be submitted directly to the assigned GFA lead auditor in the preparation phase of the audit.

### 15 Annex [\*]

Stakeholder List

Digital map of the FMUs

GFA dispute resolution procedure [\*]

Checklists / Standards used (obligatory as <u>separate</u> part of this file in case of main and recertification audits. The checklist shall be sent in as separate document in word and as pdf file and will be merged with the report file prior to submission to the client.



### List of contacted stakeholders) [\*]

#### **Administrations and institutions**

- Ministry of Agriculture, Forestry and Fisheries (MAFF)
  - ELC review committee at MAFF
  - Dept of Agr plannning & statistic
  - o Provincial Dept. Agriculture Forestry and Fisheries
  - Forest Administration Cantonment
  - Forest Administration Division
  - Forest Administration Triage
- Ministry of Environment (MoE)
  - EIA Dept
    - o KPS\_Pro Dept of Envir
- Land Administration
- Deputy Provincial Governor
- District Governor
- Deputy District Governor
- District Police Chief

#### NGOs

- Conservation International
- WWF
- Wildlife Alliance
- Recoftc
- GIZ
- Save Cambodian Wildlife
- Cambodian Red Cross
- Flora and Fauna International

### **Subcontractor and partners**

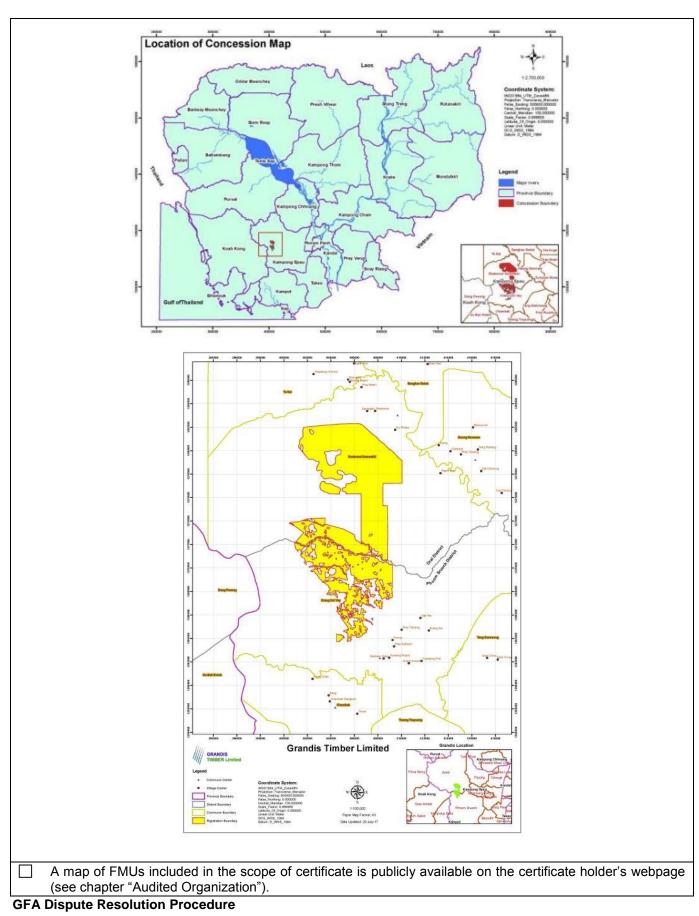
- Phnom Penh Sugar Cane
- RDI (Lab for water testing))
- Institut Pasteur du Cambodge
- Scaroni and Assoc (Legal advisors))
- ATA
- Price Waterhouse Coopers (Finanical Auditor)
- BUN & Associate (lawyer)
- Sambath Contractor (Contractor government relations)

#### Commune/Village (Krang Dey Way, Chambock, Ramsey Samaki)

- Village Chief
- Dep Village chief
- Commune Chief
- Commune Deputy

Location of the FMUs include in the scope of certification [\*]







In order to increase the public accountability of the certification process stakeholders and certificate holders have access to GFA's dispute resolution procedure (DRP).

All concerns related to GFA's certification decision can be addressed to the GFA headquarter. Concerns NOT addressed to GFA headquarters, GFA staff or GFA affiliates are not accepted. Anonymous disputes, complaints and appeals will be rejected. Further mass mailings and mass emailing to GFA addressing the same or similar issues will be rejected.

The DRP provides procedures that allow the aggrieved party the opportunity to present his/her case to GFA staff. GFA provides an initial response, including an outline of GFA proposed course of action to follow up on the complaint or appeal, within two (2) weeks of receiving a complaint or appeal. GFA keeps the complainant(s) informed of progress in evaluating the complaint/appeal, and has investigated the allegations and specified all its proposed actions in response to the complaint or appeal within three (3) months of receiving the complaint or appeal, extendable to twelve (12) months. Full implementation of actions and confirmation of implementation (e.g. correction and closing out of non-compliances that may have been identified as a result of the complaint or appeal) are completed in compliance with FSC requirements and standards.

Please note: Disputes, complaints and appeals can only be considered valid if related to issues under the authority of GFA and related to Forest Stewardship Council standards.