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FM-02ps – 16 August 13



Forest Management
Certification Assessment
Report for:

Public Summary

Industrie Forestière de Ouessou
In
Republic of the Congo

Report Finalized: December 3, 2014
Audit Dates: Oct. 27 - Nov. 3, 2014
Audit Team: Alexandre Boursier
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Ugo Lapointe
Alfred Nkodia

Certificate code(s): SW-FM/COC- 007088
Certificate issued: 4/12/2014
Certificate expiration: 3/12/2019

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INTRODUCTION

This report presents the findings of an independent certification assessment conducted by a team of specialists representing the Rainforest Alliance. The purpose of the assessment was to evaluate the ecological, economic and social performance of IFO forest management as defined by the Principles and Criteria established by the Forest Stewardship Council™ (FSC®).

The Rainforest Alliance founded its previous SmartWood program in 1989 to certify responsible forestry practices and has grown to provide a variety of auditing services. Rainforest Alliance certification and auditing services are managed and implemented within its RA-Cert Division. All related personnel responsible for audit design, evaluation, and certification/verification/validation decisions are under the purview of the RA-Cert Division, hereafter referred to as Rainforest Alliance or RA.

This report contains four main sections of information and findings and several appendices. Sections 1 through 4 of the report plus appendix I will become public information about the forest management operation and comprise a public summary of the full report that may be distributed by Rainforest Alliance or the FSC to interested parties. The remainder of the appendices are confidential, to be reviewed only by authorized Rainforest Alliance and FSC personnel bound by confidentiality agreements. A copy of the public summary of this report can be obtained on the FSC website at <http://info.fsc.org/>.

A key purpose of the Rainforest Alliance auditing is to recognize conscientious land stewardship through independent evaluation and certification of forestry practices. Forestry operations that attain FSC certification may use Rainforest Alliance and FSC trademarks for public marketing and advertising.

Standard Conversions

1 mbf = 5.1 m³
1 cord = 2.55 m³
1 gallon (US) = 3.78541 liters

1 inch = 2.54 cm
1 foot = 0.3048 m
1 yard = 0.9144 m
1 mile = 1.60934 km
1 acre = 0.404687 hectares

1 pound = 0.4536 kg
1 US ton = 907.185 kg
1 UK ton = 1016.047 kg

1. SCOPE OF THE CERTIFICATE

1.1. Scope of the certificate

Forest management enterprise (FME) information:			
FME legal name:	Industrie Forestière d'Ouesso		
FME legal jurisdiction:	Republic of the Congo		
Contact person (public):	Antoine Couturier		
Address:	PO Box 135, Ouesso; P.O. Schutzengelstrasse 36, 6340 Baar, Zurich, Switzerland		
Tel/FAX/email:	+242.05.540.16.60 / couturier@ifo-congo.com		
Website:	www.danzer.com		
Reporting period:	N/A	Dates	Oct. 27 - Nov. 3, 2014

A. Scope of Forest Area			
Type of certificate: single FMU		SLIMF Certificate not applicable	
Group or Multiple FMU	Number of group members (if applicable):		
	Total number of Forest Management Units FMUs: (if applicable, list each below):		1
	FMU size classification within the scope:		
		# of FMUs	total forest area of FMU's
	< 100 ha		ha
	100 – 1000 ha		ha
	1000 – 10 000 ha		ha
	> 10 000 ha	1	1 159 643 ha
	SLIMF FMUs		ha
Group Certificate: List of FMUs included in the certificate scope provided in Appendix II:			
Single/Multi-FMU Certificate: List of each FMU included in the certificate scope:			
FMU Name/Description	Area	Forest Type	Location Latitude/Longitude
FMU Ngombé	1 159 643 ha	Natural	Ouesso, Dep. Sangha, Congo E. 16 ° 11 'N. 1 ° 26'
	ha		
	ha		

B. FSC Product categories included in the FM/CoC scope			
<input checked="" type="checkbox"/>	Main Class	Sub Class 1	Species
<input checked="" type="checkbox"/>	W1 Rough Wood	W1.1 Roundwood (logs)	
<input checked="" type="checkbox"/>	W1 Rough Wood	W1.1 Roundwood (logs)	
<input checked="" type="checkbox"/>	W2 Wood charcoal		
<input checked="" type="checkbox"/>	W3 Wood in chips or particles	W3.1 Wood chips	
<input type="checkbox"/>	W4 Impregnated/treated wood	W4.1 Impregnated roundwood	
<input type="checkbox"/>	W5 Solid wood (sawn, chipped, sliced or peeled)	W5.1 Flitches and boules	
<input type="checkbox"/>	Non Wood Forest Products	[enter from FSC-STD-40-004a v2-0]	

<input type="checkbox"/>	other		
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C. Species and Sustainable Rate of Harvest (AAC)					
Latin name	Common trade name	2014 AAC gross volumes	2014 AAC official volumes	Actual harvest (2014 AAC) 01/10/2014	Projected harvest for next year (2015 AAC)
		For promotion species below, all grades are explored (which give real gross possibility)			
<i>Khaya anthotheca</i>	ACAJOU	0 m3	0 m3	0 m3	0 m3
<i>Aningeria robusta</i>	ANIEGRE	0 m3	0 m3	0 m3	0 m3
<i>Triplochiton scleroxylon</i>	AYOUS	0 m3	0 m3	0 m3	0 m3
<i>Guarea cedrata</i>	BOSSE CLAIR	30 580 m3	29 112 m3	11 883 m3	20 212 m3
<i>Lovoa trichilioïdes</i>	DIBETOU	459 m3	276 m3	0 m3	308 m3
<i>Tieghemella africana</i>	DOUKA	0 m3	0 m3	0 m3	0 m3
<i>Afzelia bipindensis</i>	DOUSSIE	182 m3	263 m3	54 m3	81 m3
<i>Milicia excelsa</i>	IROKO	25 376 m3	20 956 m3	22 167 m3	46 911 m3
<i>Swartzia fistuloïdes</i>	PAU ROSA	0 m3	0 m3	0 m3	0 m3
<i>Entandrophragma cylindicum</i>	SAPELLI	98 284 m3	87 570 m3	79 396 m3	64 799 m3
<i>Entandrophragma utile</i>	SIPO	10 883 m3	10 899 m3	8 040 m3	11 402 m3
<i>Milletia laurentii</i>	WENGE	45 561 m3	36 102 m3	7 118 m3	12 547 m3
		For promotion species below, only the usable qualities are explored (gross possibility is underestimated for these species)			
<i>Lophira alata</i>	AZOBE	95 565 m3	85 659 m3	16 583 m3	50 693 m3
<i>Nauclea diderrichii</i>	BILINGA	13 855 m3	20 033 m3	1 277 m3	5 625 m3
<i>Guibourtia demeusii</i>	BUBINGA	12 m3	20 m3	0m3	0m3
<i>Diospyros crassiflora</i>	EBENE NOIR	2 112 m3	3 960 m3	134 m3	348 m3
<i>Albizia ferruginea</i>	IATANDZA	464 m3	370 m3	0m3	0m3
<i>Entandrophragma candollei</i>	KOSIPO	34 524 m3	33 852 m3	10 207 m3	19 373 m3
<i>Terminalia superba</i>	LIMBA (FRAKE)	6 417 m3	8 470 m3	157 m3	4 434 m3
<i>Gilbertiodendron dewevrei</i>	LIMBALI	7 625 m3	8 460 m3	603 m3	3 206 m3
<i>Gambeya lacourtiana</i>	LONGHI BLANC	153 m3	162 m3	0m3	0m3
<i>Autranella</i>	MUKULUNGU	2 104 m3	1 748 m3	0m3	1 695 m3
<i>Pterocarpus soyauxii</i>	PADOUK ROUGE	2 087 m3	2 275 m3	0m3	5 506 m3
<i>Erythrophleum ivorense</i>	TALI	22 635 m3	23 987.5 m3	7 919 m3	10 469 m3
Total AAC		398 879 m3	374 174 m3	165 538 m3	257 608 m3
Total annual estimated log production:				200 000 m3	
Total annual estimates production of certified NTFP:				0 m3	
(list all certified NTFP by product type):				m3 m3 m3	

D. FME Info	
Forest zone	Tropical
Certified Area under Forest Type	
- Natural	1 159 643 ha
- Plantation	0 ha
Stream sides and water bodies	Linear Kilometers

E. Forest Area Classification	
Total certified area (land base)	1 159 643 ha
1. Total forest area	1 109 881 ha

a. Total production forest area		798 182 ha
b. Total non-productive forest area (no harvesting)		311 699 ha
- Protected forest area (strict reserves)	311 699 ha	
- Areas protected from timber harvesting and managed only for NTFPs or services	ha	
- Remaining non-productive forest	ha	
2. Total non-forest area (e.g., water bodies, wetlands, fields, rocky outcrops, etc.)		49 762 ha

F. Ownership/Management Classification

Ownership Tenure		State/Public ownership
Management Tenure (list primary tenure type for group certificates)		private management
Certified area that is:		
Privately managed	1 159 643 ha	
State/Public managed	ha	
Community managed	ha	

G. Forest Regeneration

Area or share of the total production forest area regenerated naturally	1 159 643 ha
Area or share of the total production forest area regenerated by planting or seeding	ha
Area or share of the total production forest are regenerated by other or mixed methods (describe)	ha

H. High Conservation Values identified via formal HCV assessment by the FME and respective areas

Code	HCV TYPES ¹	Description:	Area
HCV1	Forest areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		967 600 ha
HCV2	Forest areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		967 600 ha
HCV3	Forest areas that are in or contain rare, threatened or endangered ecosystems.		88 000 ha
HCV4	Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		195 500 ha
HCV5	Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		48 500 ha
HCV6	Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		ha
TOTAL HCVF AREA			967 600 ha
Number of sites significant to indigenous people and communities			123 sites (2008-2013), but evolving

I. Pesticide Use

FME does not use pesticides.

¹ The HCV classification and numbering follows the ProForest HCVF toolkit. The toolkit also provides additional explanation regarding the categories. Toolkit is available at <http://hcvnetwork.org/library/global-hcv-toolkits>.

1.2. Exclusion of areas from the scope of certificate

X	Applicability of FSC partial certification and excision policy
<input type="checkbox"/>	All forest land owned or managed by the FME is included in the scope of this evaluation.
<input checked="" type="checkbox"/>	FME owns and/or has management involvement in other forest land/properties (forest management units) not being evaluated. If yes, complete sections A & D below.
<input checked="" type="checkbox"/>	Is any portion of the forest management unit (s) under evaluation for certification being excised from the scope of the evaluation? If yes, complete sections B, C & D below. Conformance with FSC-POL-20-003 <i>The Excision of Areas from the Scope of Certification</i> shall be documented below.
A. Comments / Explanation for exclusion of FMUs from certification:	
Finding: Area of about 1 300 ha excluded because of major non-conformance caused by a third party (the Congolese State) who built a hydroelectric dam with the implementation of an environmental impact study underway. Also, the "Série de développement Communautaire" (SDC) is managed by the state and local communities (48 500 ha) and is excluded from the scope of the certificate, due to lack of adequate control by IFO on the activities that take place there.	
B. Rationale for excision of area from FMU(s) included in scope of evaluation: <i>Note: Rationale shall be consistent with one of the permitted conditions specified in FSC-POL-20-003, under which such certifications may be permitted.</i>	
Finding: The areas were excluded during a past annual audit, in the previous certificate. The requirement to notify stakeholders was then met. The exclusion does not have to be justified again but Rainforest Alliance still resumes here the conformance verification with FSC-POL-20-003 of the exclusion.	
<p>An area of 48 500 ha (includes the above area) is excluded ("Séries de développement communautaire" - SDC, which is an area set aside for community usage, in support of community development) due to sufficient lack of control by the IFO on the activities that take place there. This area includes a road and a hydroelectric dam carried out by the Congolese state without conducting a prior environmental impact study. This causes a major non-conformity on which IFO has no control or responsibility.</p> <p>All these areas (roads, dam and SDC) were excluded in 2012. It is therefore not new exclusions. However, it should again remind the reasons for these exclusions.</p> <p><u>Justification :</u> According to the Forest Code, the SDC management, unlike the management of the production series and other management series, is under the direct responsibility of the "Ministère de l'Économie Forestière et du Développement Durable" (according to the Arrêté n°2672/MDDEFE/CAB du 15 Avril 2010, article 2), which also prepares the five-year management plan. The activities permitted in the SDC (installation of new villages, building houses, redevelopment or road construction, agriculture with the possibility of chemicals use banned by FSC ...) are not the responsibility of the IFO society and are not under its control or authority.</p> <p>In addition, the government is asphaltting and redoing the national road which is in the SDC and construct a dam on the Lengué river entirely in the SDC. This is achieved without any preliminary social or environmental impact study. The impact study is being finalized and the work had already been started. During construction, several camps, quarries and laterite gravel pits were created without IFO being able to influence in any way the work, which is under the authority of the Chair (<i>département des grands travaux</i>). Environmental and social impacts, not in conformance with the FSC standard, have already been reported in 2012. For these reasons, the SDC should not be included in the scope of the FSC certificate.</p> <p>Also, ASI said in its 2011 audit that this area would most likely not be part of the scope of FSC, given the reasons stated above. IFO has applied the FSC-POL-20-003 procedure to exclude the SDC from the scope of the certificate. SGS had then approved that exclusion in 2012.</p>	

It is very clear that IFO does not exclude these areas to be exempted from the standard. On the contrary, the auditors found that IFO continues to fully engage with communities and Aboriginal people (participatory mapping, CLIP) and applied the same procedures (healthy practices, allowable cut, health and safety, etc.) on excluded areas. So, apart from the activities of third parties over which IFO has no control, auditors find that IFO treats excluded parties the same way as certified parties. Since SDC is riparian to the certified territory and that the communities who live there have both interests and territorial impacts on the certified territory notably due to hunting, the auditors will continue to verify the involvement and practices of IFO in the SDC.

C. Summary of conformance evaluation against requirements of FSC-POL-20-003

Finding: IFO has submitted a document outlining a rationale for all of the "2.2 Excision of Areas from scope of certification" section of the FSC-POL-20-003 exclusion policy. The auditors reviewed and evaluated this document. As provided by the exclusion process, the auditors have completed their own analysis of excision proposal based on the IFO argument and the observations made during field visits to the areas proposed for excision.

For example, auditors notice that the excluded area is well defined and mapped, and IFO does not control the activities that take place. Auditors notice that a system is in place to ensure that if IFO receives wood from excluded areas, it will be segregated and not used as certified (as provided in the CoC forest and plant procedures). The reasons for this exclusion are well documented and justified (see above), et the remaining areas on which IFO has management responsibilities are declared transparent.

A detailed statement for each of these elements is documented in the "Application of FSC-POL-20-003 to IFO" and kept in the RA archives. The auditors concluded that the exclusion of the SDC and the area affected by the dam construction is fully justified. Since the area is excluded, IFO cannot make a statement on FSC timber harvested in these areas, however IFO continues to apply all of the FSC standard as part of its activities on the excluded territory.

D. Control measures to prevent contamination of certified wood with wood from excluded/excised forest areas.

Finding: At the time of the audit there was no logging in the SDC, however segregation measures are provided at the factory when non-certified wood will be transported to the factory's timber yard.

Forest Management Units Excluded From Evaluation

Forest area	Location	Size (ha)
SDC and dam		48 500

2. ASSESSMENT PROCESS

2.1. Certification Standard Used

Forest Stewardship standard Used for assessment:	FSC Forest Stewardship Standard for the Republic of Congo, FSC-STD-RoC-01-2012. Republic of Congo Natural and Plantations EN
Local Adaptation: (if applicable)	None

2.2. Assessment team and qualifications

Auditor Name	Alexandre Boursier, F. Eng., M.Sc.	Auditor role	FM Lead Auditor, Forester, Socio-economic aspects
Qualifications:	A professional forester since 1996, Alexandre has experience working in Africa, Asia and South, Central and North America in forest certification, education, forest inventory, community forestry and natural resources management. From 2004 to 2013 he was the country manager for Rainforest Alliance in Canada. Alex has a Master's degree in social-forestry and is a sustainable forestry specialist, a Forest Stewardship Council (FSC) senior assessor and lead auditor trainer. He has conducted numerous stakeholder consultations, developed sustainable forest management and legality standards and executed a large number of forest management assessments worldwide. In his forest management assessment activities, Alex routinely works with multidisciplinary teams of people of different national and cultural backgrounds. He is fluent in English, French and Spanish. Alex recently completed the Sustainable Agriculture Network (SAN) Lead auditor training. He currently lives in Sri Lanka. Alex completed the Sustainable Agriculture Network (SAN) Lead auditor training in 2014.		
Auditor Name	Adolphe Ondoua	Auditor role	Forester, Socio-economic aspects
Qualifications:	Forest engineer with Master's degree. M.Ondoua is Rainforest Alliance's representative for the Congo Basin. He worked for two years at the ministry of forests and wildlife of Cameroon, as well as for Rougier from 2003 to 2008. M.Ondoua was trained as Lead auditor by the Rainforest Alliance for forest management and chain of custody and has a large number of audits to his name in Cameroon, Gabon and the Republic of Congo.		
Auditor Name	Ugo Lapointe	Auditor role	Environmental aspects
Qualifications:	Ugo is a senior auditor for the Rainforest Alliance team. As a biologist/ researcher who specialized in forest ecology, he joined the Rainforest Alliance in 2011. Until December 2013, he held the position of coordinator of FSC certification in Quebec before working with the Rainforest Alliance as a consultant. Ugo completed the Rainforest Alliance FSC auditor training for the forest management and for the Chain of Custody as well as the Lead auditor ISO 14001 training.		
Auditor Name	Alfred Nkodia	Auditor role	Legality Socio-economic aspects
Qualifications:	Congolese geographer with a DESS (Specialized Graduate Diplomas) in Integrated Management of Tropical Forests and Lands, Alfred regularly works with the Independent Observer. He completed the Rainforest Alliance auditor training in 2013. As part of this audit, Alfred is responsible for the legality aspects as well as the socio-economic aspects.		

2.3. Report peer reviewers

Qualifications:	<p>Forest Engineer Graduate from l'Ecole Nationale du Génie Rural des Eaux et des Forêts de Nancy (AgroParisTech), FSC and PEFC consultant and independent auditor. The auditor was project manager for 9 years in Central Africa, first in the Central African Republic as a volunteer for the Ministère Français des Affaires Etrangères, then the Congo.</p> <p>Expert in tracability and forest legality, he has carried out since 2013, FSC and PEFC audits on behalf of Certification Bodies in France.</p>
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2.4. Assessment schedule (including pre-assessment and stakeholder consultation)

Date	Location /main sites	Main activities
August 25, 2014		Public Notice announcing the assessment is sent
October 23, 2014	Ngombé	On-site preparation of auditors and meetings with stakeholders
October 27, 2014	Ngombé	Opening meeting and beginning of audit
November 3, 2014	Ngombé	Receipt of last supporting documents, last interviews and closing meeting
November 3-5, 2014		Report writing
November 17, 2014		Presentation of preliminary report to IFO
		Report finalization for external review
December 1, 2014		External review
December 3, 2014		Report finalization
December 3, 2014		Certification decision
Total number of person days used for the assessment: 36.5 = number of auditors participating 4 X number of days spent in preparation, on site and post site visit follow-up including stakeholder consultation 9.		

2.5. Evaluation strategy

2.5.1 List of FMUs selected for evaluation

FMU Name	Rationale for Selection
Ngombé	This is the only FMU covered by the scope of the audit. Logging/harvesting work is in progress at the time of the audit and were visited in the UFP 2 (Forestry Production Unit).

2.5.2 List of management aspects reviewed by assessment team:

Type of site	Sites visited	Type of site	Sites visited
Road construction	1	Illegal settlement	0
Soil drainage	> 15	Bridges/stream crossing	2
Workshop	2	Chemical storage	2
Tree nursery	N/A	Wetland	5
Planned Harvest site	2	Steep slope/erosion	1
Ongoing Harvest site	1	Riparian zone	
Completed logging	3	Planting	N/A
Soil scarification	N/A	Direct seeding	2
Planting site	N/A	Weed control	N/A
Felling by harvester	N/A	Natural regeneration	15
Felling by forest worker	1	Endangered species	2
Skidding/Forwarding	1	Wildlife management	N/A
Clearfelling/Clearcut	N/A	Nature Reserve	0
Shelterwood management	N/A	Key Biotope	0
Selective felling	7	Special management area	0
Sanitation cutting	N/A	Historical site	0

Pre-commercial thinning	N/A	Recreational site	0
Commercial thinning	N/A	Buffer zone	0
Logging camp	N/A	Local community	8

2.5.3 Summary of Pre-assessment Findings

This is a reassessment. There is no pre-assessment.

2.6. Stakeholder consultation process

The purpose of the stakeholder consultation strategy for this assessment was threefold:

- 1) To ensure that the public is aware of and informed about the assessment process and its objectives;
- 2) To assist the field assessment team in identifying potential issues; and,
- 3) To provide diverse opportunities for the public to discuss and act upon the findings of the assessment.

This process is not just stakeholder notification, but wherever possible, detailed and meaningful stakeholder interaction. The process of stakeholder interaction does not stop after the field visits, or for that matter, after even a certification decision is made. Rainforest Alliance welcomes, at any time, comments on certified operations and such comments often provide a basis for field assessment.

In the case of {operation} prior to the actual assessment process, a public consultation stakeholder document was developed and distributed by email, FAX and mail. Through input from {list organizations or agencies, operation and assessment team members who contributed to the development of the stakeholder list} an initial list of stakeholders was developed and public announcements were distributed to them. This list also provided a basis for the assessment team to select people for interviews (in person or by telephone or through email). Public meetings were also held and written surveys were distributed to gather stakeholder input.

Stakeholder Type (NGO, government bodies, local inhabitant, contractor etc.)	Stakeholders Notified (#)	Stakeholders consulted directly or provided input (#)
Government agency	2	3
Aboriginal people	2	> 15
FMU personnel	> 15	60
Contractors	3	2
Local Community members, regional development, PFNL	Multiple	Multiple (> 50)
Municipality	1	0
NGOs	10	3
Hunters	0	5
Workers, Labor Union	Several Hundred	19

3. ASSESSMENT FINDINGS AND OBSERVATIONS

3.1. Stakeholder comments received

The stakeholder consultation activities were organized to give participants the opportunity to provide comments according to general categories of interest based upon the assessment criteria. The table below summarizes the issues identified by the assessment team with a brief discussion of each based upon specific interview and/or public meeting comments.

FSC Principle	Stakeholder comment	Rainforest Alliance response
<p>P1: FSC Commitment and Legal Compliance</p>	<p>A stakeholder mentioned to auditors that logging trucks carrying IFO wood had been involved in the ivory trade.</p>	<p>In this regard, the auditors met the Departmental Directorate of the Ministry of Forestry in Ouesso and that of the Customs. It was possible to confirm that tusks were seized twice by the authorities, once in 2012 and another in March 2014 on T.O.K. logging trucks, a company acting as a subcontractor for several logging companies in the region including IFO. These logging trucks were carrying IFO wood on their way to Cameroon when they got caught with the ivory tusks. In the 2014 event, one of the drivers fled while the other was caught and sentenced. The investigation revealed that he loaded the ivory (and three panther skins) in Mokéko, outside the FMU, on the way towards the border of Cameroon. IFO is not responsible for these events, which involve T.O.K. and its drivers. The auditors note that since these events, IFO reiterated with its subcontractor the requirements of the FSC standard and the consequences of its implementation. Also, IFO has installed with the PROGEPP project an ecoguard checkpoint at the Ngombé exit to control all vehicles, trucks and logging trucks, at the exit of Ngombé. IFO is in conformance.</p>
<p>P2: Tenure & Use Rights & Responsibilities</p>	<p>No comments received.</p>	<p>No response needed.</p>
<p>P3 – Indigenous Peoples’ Rights</p>	<p>An international NGO interested in indigenous issues in the Congo Basin inquired about the relationship between IFO and Bantu communities and indigenous peoples. The question and the answer being long, is found at the bottom of this table. *</p>	<p>Rainforest Alliance auditors sampled seven mixed communities (Bantu and indigenous) along the Sangha River (Tokou - in an area where IFO had no forest management for several years), along the new road built by the Chinese (Liouesso, Attention and Mahounda) and along the Sembé road (Kandeko, Paris Village and Zoulabouth). The auditors have carried out separate interviews for the Bantu and the indigenous people in most villages sampled *.</p>
<p>P4: Community Relations & Workers’ Rights</p>	<p>A local resident said the subcontracting companies that transport logs do not provide job</p>	<p>IFO has an internal policy that promotes the hiring of staff from local communities and auditors find it is implemented, with</p>

	<p>opportunities for local communities while some people are qualified for this job and are looking for employment.</p> <p>The experienced workers and members of the four established unions within IFO said they never received copies of ILO conventions 87 and 98.</p> <p>Experienced workers reported being victims of auditor discrimination in the promotion, because they are Congolese. According to them, after a decade or more in the company, they are not treated the same way as the “whites”, who occupied those positions and were sometimes less busy than them. They feel that this discrimination is due to their supervisor who will not motivate their promotion. Some said they were prepared to resign if the discrimination persists. Moreover, others stated that within the company there would be positions for “blacks” and positions for “whites”.</p> <p>An inquiry has been raised with regard to the possibilities for expatriate employees of subcontractors to benefit from social contributions paid to the NSSF in their names.</p>	<p>95% of IFO employees meeting this criterion.</p> <p>After verification, the auditors found the transmittal letter of these documents and a training program that was given to workers. In this context, IFO is consistent with indicator 4.3.6 which reads as follows: “The forest manager must have copies of ILO Conventions 87 and 98 [...]”.</p> <p>After verification, the auditors found a strong dominance of expatriates (Europeans) in positions of high responsibility (management). At the level of heads of department, we however find Africans. Moreover, it was found that advertising is not widely done, especially on the vacancy of senior positions, such is the case of the DG position, which is not displayed at IFO. Within the meaning of indicator 4.6.2 which states that “workers cannot be subject to discrimination in hiring, promotion, dismissal, remuneration and employment in the context of social security”, auditors find that IFO is not in conformance with this indicator. NCR 4.6.2/14 is issued.</p> <p>IFO regularly pays social security contributions for its employees. The majority of its subcontractors do the same. However, workers and subcontractors do not know the legal procedure to reap the benefits of those contributions. An observation was issued to IFO in order to inform its workers and subcontractors on the conditions for obtaining these contributions in a timely manner (OBS 4.2.3/14)</p>
<p>P5: Benefits from the Forest</p>	<p>One interested party told auditors that projects funded by the Local Development Fund (LDF) within communities suffering from a lack of support and monitoring in their implementation, and that IFO is holding amounts which the villagers were in great need of.</p>	<p>After verification, the auditors find that indeed among the projects funded by the LDF and produced by the villagers (cultivation, breeding, buying fishing equipment, etc.), many are bad investments by a lack of support and monitoring of the beneficiaries. Thus, indicator 4.1.7 says that the applicant must contribute to the development of the local economy while respecting its particular specifications of the</p>

		<p>agreement, the requirements set/granted and the national standards. Because of the weaknesses of the LDF, IFO is not in conformance with these requirements. This is the object of NCR 4.1.7/14. In terms of withholding the funds by IFO, the auditors find that IFO was not withholding but rather paying sums, when needed, to prevent the accumulation of a greater amount in the account of the LDF, which would represented a risk given the weakness of accounting conducted by the LDF. Now, IFO pays all funds in the account of the LDF since September 2014.</p>
P6: Environmental Impact	<p>One NGO reported that hunting safaris had been made by foreign agencies in the Ngombé FMU until 2013. The NGO adds that the operators of these safaris had a valid authorization from the authorities, they accepted that WCS dictates where they could hunt, and they accepted that the WCS Wildlife protection teams follow and observe the hunt. For its part, this NGO had no problem with the hunt in the FMU.</p>	<p>The species listed in this safari was the buffalo which is a partially protected species whose hunting is permitted with a big game licence. These hunting attempts were unsuccessful according to the stakeholders interviewed. In addition, such safaris have not reoccurred since 2013. Obtaining the prior authorisations, the cooperation of the hunters with the NGOs and the fact that no new hunting activities are planned means there is no non-conformance.</p>
	<p>An NGO involved in wildlife management on FMU Ngombé said the ecoguards coordinator was competent and exercised good control over them.</p>	<p>The auditors found that the ecoguards are actually doing their job thoroughly and seriously.</p>
	<p>A stakeholder said that at least two of the three Chinese companies operating in the region were involved in the illegal ivory trade, and placed orders to villagers.</p>	<p>The auditors were unable to verify these claims. WCS said it found 4-5 elephant carcasses in the last 4-5 years, so an average of one per year. If there is an ivory trafficking, it is not possible to know if it comes from parks and other FMUs around the candidate forest or from the candidate forest itself. However, the auditors, find that IFO and its partners deploy significant resources to control poaching in Ngombé FMU.</p>
P7: Management Plan	No comment received	No response required
P8: Monitoring & Assessment	No comment received	No response required
P9: Maintenance of High Conservation Value Forest	<p>An interested party consulted as part of identifying HCVs and protective measures indicated that IFO ignored some of his important comments</p>	<p>IFO has demonstrated having made concerted efforts periodically to obtain the opinion of stakeholders on the management of high conservation values. However, in terms of the protection of the bay, auditors find that communication between IFO and</p>

		its partners was inadequate and was unable to make a concerted decision. For this reason, NCR 9.3.1/14 is issued.
P10 - Plantations	No comment received	No response required

Stakeholder comments	Rainforest Alliance Response
<p>An international NGO interested in indigenous issues in the Congo Basin asked about the relationship between IFO and Bantu communities and indigenous peoples.</p> <p>This organization wanted to know:</p> <p>a) how serious and informed on indigenous people IFO is;</p> <p>b) Whether the groups actually give them their CLIP;</p> <p>c) If their rights, resources and values are integrated into the management plan;</p> <p>d) If a strong process of conflict resolution is in place;</p> <p>e) If improvements in the living conditions of local populations can be identified as a result of IFO's activities;</p> <p>f) If the local people were informed of the suspension of the IFO FSC certificate;</p> <p>g) What their thoughts are on the possibility of a new FSC certificate for IFO;</p> <p>h) How IFO could solve the problems caused by the Chinese company making the road through the FMU without CLIP;</p> <p>i) Is there is a risk that mining companies enter the FMU;</p> <p>j) Is IFO well prepared to confront the</p>	<p>Rainforest Alliance auditors sampled seven mixed communities (Bantu and indigenous) along the Sangha River (the village of Tokou - an area where IFO has had no forest management for several years), along the new road built by the Chinese (Liouesso, Attention and Mahounda) and along the Sembé road (Kandeko, Paris Village and Zoulabouth). The auditors have carried out separate interviews for the Bantu and the indigenous people in most villages sampled.</p> <p>The auditors found that the relationship between IFO and Bantu and indigenous communities was good. The IFO "social" team is competent, young, committed and very present in the field, with regular, well-conducted meetings, with minutes signed by all participants. IFO's Consultation Procedure prescribes that meetings are held separately between the Bantu and indigenous peoples, to avoid marginalising any segment of the population and to ensure that the message of the meeting is heard/understood by all members of the communities. If the members of the social team find that women or other groups cannot speak freely (lack of participation), separate sessions are held with these groups. This was verified by the auditors during the interviews in the villages. For topics that also concern women or that are specific to them, separate meetings will be held as well. Each meeting is made in the language of the target community. IFO applies social mapping since its inception (2008), but more recently (2013) adopted and began implementing a participatory mapping procedure in accordance with the PRA-Mapping method (Participatory Rural Appraisal). When local guides are needed for the implementation of the field part of the cartography exercise in the coastal villages, like for UFP3 where operations are scheduled for 2016, IFO's social team ensure guides are chosen so that they represent different segments of the population (Bantu, indigenous population, male/female, depending on the activity). The IFO social team is itself composed of five people, including two indigenous people and a woman.</p> <p>Specifically, auditors found that IFO:</p> <p>a) Takes interactions with indigenous people seriously;</p> <p>b) Until 2013 used to apply a consultation method that lead to consent, also through participatory mapping, but for the UFP3 which will be operating in 2016, IFO applies its CLIP procedure, which is much more comprehensive and structured around a strong element of participatory mapping. The auditors will be back for the first annual audit a year before operating the UFP3 and will be able to determine whether the CLIP has really been given. Until then, IFO harvests in UFP2 which is in a secluded peninsula in which communities have not shown much interest. The auditors met with the two largest affected indigenous villages (Liouesso and Attention) and found they were aware of IFO's activities and had given their consent. The consultation for this sector, however, was in a prior proceeding. The process applied for UFP3 is however aligned to the new definition of the CLIP as recently developed by FSC and presented in guidelines (recommendations) that could become the standard, once the new international FSC standard is implemented;</p> <p>c) The management plan generally presents resource rights and indigenous values. The current participatory mapping process underway in a dozen villages will allow IFO to consider all of these rights, values and resources in the development of the management plan of UFP3. Auditors have already seen the first version of the maps. The indigenous people are trained by IFO in the use of GPS so that they can identify themselves through the mapping process the sites and the trees they want to see protected;</p> <p>d) IFO has a comprehensive dispute resolution procedure. It was developed by IFO</p>

<p>problems that could arise with the entry of mining in the area.</p>	<p>but presented to neighboring communities and local authorities for comments. No comments having been provided by any party, the procedure was adopted as proposed. The auditors found during visits to the seven sampled communities that they understand the procedure and are satisfied with the process and outcome.</p> <p>e) Yes. IFO largely fulfilled the contractual obligations of its ‘<i>cahier de charges sociales</i>’ (the building of schools, health centers, etc.) and provided health centers with drugs for 5 years for a total of 300 million CFA. The volumes harvested in the SDC between 2010 and 2012 were paid 1000 CFA/m³ to the communities, for a total of 109 million CFA (between 4 and 23 million per affected village). Finally, IFO funds the LDF, which, despite its weaknesses, represents a very important opportunity for the Bantu and indigenous people. The auditors visited indigenous agricultural projects which were working well in Zoulabouth and fully funded by the LDF.</p> <p>f) Several indigenous people and Bantu interviewed were aware of the suspension of the certificate. Others had never heard of FSC certification. This is a non-conformance with the standard and NCR 02/14 is issued;</p> <p>g) The auditors did not notice any enthusiasm about the idea of certification among villagers met in general, but certainly no particular apprehension either;</p> <p>h) Affected territories were excluded from the scope of the certificate. However, IFO continues to be fully involved with the communities. See section 1.2 above. Indigenous people and the Bantu met in the villages liked the job opportunities brought by Chinese companies;</p> <p>i) Prospecting permits for mines were granted and two operating licenses. None have yet been implemented. The auditors did not pursue this question since there is still no activity, and that in any case information on upcoming projects is nonexistent.</p> <p>j) The auditors did not elaborate on this issue because the entry of mining remains hypothetical for now.</p>
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3.2. Summary of Evaluation Findings for FSC Forest Criteria

PRINCIPLE 1: Compliance with law and FSC Principles					
Criterion 1.1 Respect for national and local laws and administrative requirements					
Conformance		Non conformance	X	NCR #(s)	01/14
Finding (strength/weakness)	IFO respects the laws and regulations of the Republic of Congo. Some contractors had not submitted a legal record to date but IFO continued to outsource some of its operations to these companies.				
Criterion 1.2 Payment of legally prescribed fees, royalties, taxes and other charges					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	IFO is current in the payment of all taxes, duties and other charges. The balance of €35,000 from the specifications has been subject to an extension until 2016.				
Criterion 1.3 Respect for provisions of international agreements					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	IFO has a copy of the international agreements and treaties, national laws and local species identified in the document of CITES.				
Criterion 1.4 Conflicts between laws and regulations, and the FSC P&C					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	IFO made a very comprehensive identification of conflicts between the laws and regulations of the Congo, and the P&C of the FSC standard. As required by the criteria				

	and indicators, IFO forwarded the list of these conflicts to its certification body and FSC representative for the region of the Congo Basin. For each identified conflict, IFO offers a policy and actions, which is useful because auditors find that despite the large number of identified conflicts, IFO can demonstrate its conformance across the territory included in the scope of the certificate. The Minor nonconformities identified during the audit does not originate from identified conflicts.				
Criterion 1.5 Protection of forests from illegal activities					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	IFO has a procedure to control the FMU limits and the different series, the illegal exploitation of timber, mining without authorization, bushfire and fishing with means prohibited by law. The team in charge of the implementation of this procedure is that of the tripartite project PROGEP (IFO, WCS, MEFDD). Despite the consensus among stakeholders regarding inadequate staffing and ecoguard material resources given the area to be monitored, they get to control illegal activities.				
Criterion 1.6 Demonstration of a long-term commitment to the FSC P&C					
Conformance		Non conformance	X	NCR #(s)	02/14
Finding (strength/weakness)	IFO and Danzer have repeatedly demonstrated their strong commitment to adhere to the FSC principles and criteria. However, the auditors find that several local communities do not know what the FSC standard is and what it implies.				
PRINCIPLE 2: Tenure and use rights and responsibilities					
Criterion 2.1 Demonstration of land tenure and forest use rights					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	IFO recognizes and respects the usage, legal or customary rights of each affected community.				
Criterion 2.2 Local communities' legal or customary tenure or use rights					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	Local communities preserve their rights to resources and control the impact of the operations carried out by IFO.				
Criterion 2.3 Disputes over tenure claims and use rights					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	There is no conflict as such on the candidate FMU. Nevertheless, IFO has a strong dispute resolution process. IFO is very proactive and engaged, through its social team, with communities. IFO has not released the results of its negotiations with the local communities.				
PRINCIPLE 3: Indigenous peoples' rights					
Criterion 3.1 Indigenous peoples' control of forest management					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	Aboriginal people of the N'gombé FMU control the forest management on their land. Participatory mapping, procedures to prevent and resolve conflicts as well as the CLIP procedure was adopted by IFO mark out aboriginal relations.				
Criterion 3.2 Maintenance of indigenous peoples' resources or tenure rights					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	The impacts of forest operations on the resources of Aboriginal people are identified and controlled. Participatory mapping procedures to prevent and resolve conflicts as well as the CLIP procedure was adopted by IFO mark out aboriginal relations.				
Criterion 3.3 Protection of sites of special cultural, ecological, economic or religious significance					

to indigenous peoples					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	Participatory mapping carried out by IFO with the Aboriginal communities helps to recognize and protect sites important for Aboriginal people.				
Criterion 3.4 Compensation of indigenous peoples for the application of their traditional knowledge					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	IFO is not intended to appropriate the aboriginal traditional knowledge in order to market them. Instead, the items identified in the territory represent “constraints” which IFO protects to be in conformance with the laws and requirements of the FSC standard.				
PRINCIPLE 4: Community relations and workers rights					
Criterion 4.1 Employment, training, and other services for local communities					
Conformance		Non conformance	X	NCR #(s)	03/14
Finding (strength/weakness)	IFO contributes to the development of the local economy through employment opportunities as well as the implementation of its specification, through the payment of fees, royalties directly to the communities, as well as the financing of micro-projects. However, the funds and micro-projects are not well managed.				
Criterion 4.2 Compliance with health and safety regulations					
Conformance		Non conformance	X	NCR #(s)	04/14 & 05/14
Finding (strength/weakness)	IFO has an excellent performance with respect to health and safety. Wearing EPI (personal protective equipment) is widespread, the base camp is clean and pleasant. All employees and other residents of the FMU have access to the health center of the living quarter, which is equipped with a functional operating theater, a medical laboratory with two biochemistry automatons tests for kidneys, liver, cholesterol, blood sugar, blood smear, amylase etc. There are also two electron microscopes, and two centrifuges to detect anemia, urine examinations etc. The IFO CMS also has a birthing unit as well as a 24-bed inpatient accommodation capacity as well as bathroom facilities with four toilets and four modern showers. However, a visit to the commissary has identified an inconsistency between the prices announced by IFO and those actually charged by the Commissary partners. The ecoguards do not wear EPI when handling animals and finally, there is no suitable means of egress for emergencies.				
Criterion 4.3 Workers' rights to organize and negotiate with employers					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	The membership of trade unions, faith-based and others, is free and has never been subject to any retaliation within the society, as evidenced by the 4 functional unions within the society, churches and other organizations in Ngombé. In general, the IFO company respects the agreements with the workers, including wages and working conditions. In case of disagreement, a procedure is provided for request and complaints, the complaint, the prevention and resolution of disputes and conflicts.				
Criterion 4.4 Social impact evaluations and consultation					
Conformance		Non conformance	X	NCR #(s)	06/14
Finding (strength/weakness)	IFO conducted a study of the social impacts of its activities on the Ngombé FMU in 2008 and identified measures to mitigate negative impacts and enhancing positive impacts. A team covering the social component is made at the IFO Environment, social and certification Directorate (management unit). It consists of a manager and four in charge of missions, including representatives of indigenous communities of the Ngombé FMU and a woman. Also, at the time of audit, an expert on human rights was making monthly visits to further enhance the skills of the social team and the				

	communities and indigenous peoples, thereby strengthening their participation. IFO regularly conducts various consultation activities to identify on an ongoing basis the social impacts and incorporate the results into forest management plans. All communities affected by the IFO operations had no copy of the summary of the management plan.				
Criterion 4.5 Resolution of grievances and settlement of compensation claims					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	IFO has and applies a procedure which prescribed conflict resolution and the compensation for damage in case of loss or damage. IFO also made the list of possible damage to village property (canoe, livestock, dogs, chickens, etc.) and identified the compensation allowed for each property.				
Criterion 4.6 Forest management must comply with all ILO Conventions					
Conformance		Non conformance	X	NCR #(s)	07/14
Finding (strength/weakness)	Wages paid by IFO are comparable to the standard of the forestry sector in the region, and higher than in other local businesses. However, the auditors found discrimination in awarding promotions.				
PRINCIPLE 5: Benefits from the forest					
Criterion 5.1 Economic viability taking full environmental, social, and operational costs into account					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	IFO operates a planned and mapped selective logging to harvest stems which is based on minimum diameters of superior usability as provided by the forestry administration. IFO applies the reduced impact logging methods defining ecologically fragile areas that must be protected and biodiversity conservation areas. The network for logging roads and skid trails is mapped to avoid as much as possible stream crossing and future or social value stems are marked on the field and mapped to ensure their preservation.				
Criterion 5.2 Optimal use and local processing of forest products					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	IFO can operate up to 24 tree species and performs primary processing, sawing, with an electric drying system and a recovery chain with a jointing system manufacturing products glued and laminated "finger-joint". Participatory mapping is performed with local populations concerned in order to identify, georeference and map trees and other products of interest to the community.				
Criterion 5.3 Waste minimization and avoidance of damage to forest resources					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	The visit of operating facilities and the data analysis available at the IFO office show that harvesting operations cause limited damage to the residual stand, especially during skidding and hauling operations. Skidding planning is made and adhered to in order to avoid future stems of species marketed on the field. Staff working in the IFO yards was trained in EFIR (reduced impact logging) operating techniques. The analysis of the IFO forest database and field visits show that wood abandonment caused by a quality unsuitable for processing or commercialisation are between 2% and 10%.				
Criterion 5.4 Forest management and the local economy					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	The management plan of the Ngombé FMU identifies NTFPs and participatory mapping is performed with the local populations concerned to identify, georeference and map trees with an interest in the communities. IFO ensures the exclusion of these trees from the cutting potential. IFO conducted a study on the consumption of				

	caterpillars, a study on fishing activities in the area of the <i>Parc National Odzala-Kokoua</i> within the framework of the Project for the Management of Ecosystems around the <i>Parc National Odzala-Kokoua</i> .				
Criterion 5.5 Maintenance of the value of forest services and resources					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	The organization has a good knowledge of forest resources and ensures proper consultation with local communities to protect forest resources on which they depend. IFO is diligent in the application of procedures to limit the impact of forest management on forest resources.				
Criterion 5.6 Harvest levels					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	The development parameters (reconstruction, mortality, rotation length and number of stems) are used to calculate the forest potential that allow the calculation of sampling rate by group of species. The harvest rate is lower than the potential of the forest provided for each group of species. The objectives of distribution and composition of the forest over time are discussed in indicator 6.3.3.				
PRINCIPLE 6: Environmental impact					
Criterion 6.1 Environmental impacts evaluation					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	IFO has developed a simple method for assessing environmental impacts which is enhanced continuously, and covers the identified risks. Mitigation procedures are in place to limit the frequency, intensity, and wherever the severity of potential impacts.				
Criterion 6.2 Protection of rare, threatened and endangered species					
Conformance		Non conformance	X	NCR #(s)	08/14
Finding (strength/weakness)	A wildlife monitoring is carried out to see the changes within its populations. The roads are closed after discontinued operating activities and the flow is not possible on them. A team of ecoguards is in place and improvements are apparent in the efficiency of the team since 2012. For endangered species "with full protection", hunting is prohibited and well-controlled in all of the FMU. To further enhance the capabilities of this team, IFO is committed to investing a substantial additional amount. Since IFO is a partner in the governance arrangement of the ecoguards' team, it obtained some information about their activities. However, mechanisms for monitoring the effectiveness of the control of hunting by ecoguards that would make changes if the team is ineffective, are not implemented by IFO. This is subject to the non-conformance with indicator 6.2.14.				
Criterion 6.3 Maintenance of ecological functions and values					
Conformance		Non conformance	X	NCR #(s)	09/14
Finding (strength/weakness)	The implementation of operational procedures with reduced impact logging (EFIR) helps minimize the impact of cuts on the forest and the specific guidelines allowing the protection of trees with ecological value. The regeneration is monitored in the permanent plots and in the skid trails of exploited areas. Seed trees of all species are kept in the stands. The minimum cutting diameter is greater than the minimum diameter prescribed by the Congolese forest administration. The diameters provided are greater than anticipated at the age of maturity of tree species which helps to leave more stems that can act as seed trees. However, some harvested species exhibit a decrease in abundance in the classes of small diameters. These species are not subject to special monitoring or specific action.				
Criterion 6.4 Protection of representative samples of existing ecosystems					
Conformance		Non conformance	X	NCR #(s)	10/14

Finding (strength/weakness)	More than 28% of the FMU area is protected in the FMU while the standard requires a minimum of 10%. However, it has not been shown that the current conservation areas are representative of the natural ecosystems of the FMU and that they are planned in its entirety to be maintained in their natural state in the long-term.				
Criterion 6.5 Protection against damage to soils, residual forest and water resources during operations					
Conformance		Non conformance	X	NCR #(s)	11/14
Finding (strength/weakness)	Good operational procedures have been developed and are being implemented. The work that IFO applies best practices for the protection of soil and water resources. Although IFO has demonstrated rehabilitating some degraded sites by rutting. The audit team found that some lumberyards and some main skidding tracks were not properly rehabilitated. The auditors find that there is a gap in the procedures to be applied in order to identify sites to be rehabilitated.				
Criterion 6.6 Chemical pest management					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	No phytosanitary products are used in the forest. At the factory, the chemicals used are not on the list of substances banned by the FSC.				
Criterion 6.7 Use and disposal of chemicals, containers, liquid and solid non-organic wastes					
Conformance		Non conformance	X	NCR #(s)	12/14
Finding (strength/weakness)	Contaminated soil, waste oil, batteries and acid are treated in Pointe Noire by a company processing hazardous waste. The auditors find that machinery drivers entering the forest, for example for logging or the layout of bulldozer skid trails, do not have in their possession the right equipment to collect oil that may spill from machinery in case of breakage. This equipment is available, but not on the machines themselves in case of an emergency.				
Criterion 6.8 Use of biological control agents and genetically modified organisms					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	No biological control agents used.				
Criterion 6.9 The use of exotic species					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	No alien species used.				
Criterion 6.10 Forest conversion to plantations or non-forest land uses					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	Areas where there is or could be conversion of forests to plantations or non-forest land within the FMU (dam, cultured in the FMU, etc.) were excluded from the scope of the certificate. There is no conversion in the candidate FMU.				
PRINCIPLE 7: Management plan					
Criterion 7.1 Management plan requirements					
Conformance		Non conformance	X	NCR #(s)	13/14
Finding (strength/weakness)	The forest management plan includes the vast majority of items required by the standard, but does not have the machinery used for forest operations or the description of the driving techniques of certain activities such as handling the forest park, evacuation etc.				
Criterion 7.2 Management plan revision					

Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	The regulations in force in the Congo does not require a periodic review unless such review is initiated by the Minister.				
Criterion 7.3 Training and supervision of forest workers					
Conformance		Non conformance	X	NCR #(s)	14/14
Finding (strength/weakness)	The standard says that the Forest workers shall receive adequate training and supervision to be sufficiently managed to correctly implement the management plan. The recruitment policy requires to favor the competence when recruiting but the job descriptions outlining the desired profiles at the workplace are not available. It is therefore not possible to make a clear link between the profile of existing workers and the company's vision.				
Criterion 7.4 Public availability of the management plan elements					
Conformance		Non conformance	X	NCR #(s)	15/14
Finding (strength/weakness)	The summary of the management plan exists and is available on the website of Danzer, however it does not include a specific section on the presence of HCV within the FMU as required by the standard, but this document is available as a separate document.				
PRINCIPLE 8: Monitoring and evaluation					
Criterion 8.1 Frequency, intensity and consistency of monitoring					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	The monitoring procedures allow the monitoring of forest composition changes and wildlife populations over time.				
Criterion 8.2 Research and data collection for monitoring					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	IFO has set up a network of permanent plots to enable the monitoring of the dynamics of plant populations by estimating classic demographic parameters since 2005. The monitoring data enables the validation of the growth of the forest as well as regeneration. Ambitious wildlife monitoring is carried out. This information is documented and analyzed periodically.				
Criterion 8.3 Chain of custody					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	The organization has set up a very good traceability system that is in conformance with regulatory requirements and ensures traceability from the strain. The first numbering of trees takes place during the selection of trees to exploit. At felling, an operating number is assigned to each tree and is applied to each section of the logs on the stump and all abandoned parts.				
Criterion 8.4 Incorporation of monitoring results into the management plan					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	The monitoring results are analyzed and taken into account in the management approach. For now, the forest management plan has not been revised, but the results of the monitoring are provided in other related documents.				
Criterion 8.5 Publicly available summary of monitoring					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	The summary of the monitoring results is available on request on the website of Danzer.				

PRINCIPLE 9: High Conservation Value Forests					
Criterion 9.1 Evaluation to determine high conservation value attributes					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	HCVFs were identified by IFO in accordance with the framework of the standard. The HCVF report has been reviewed by some relevant stakeholders.				
Criterion 9.2 Consultation process					
Conformance	X	Non conformance		NCR #(s)	
Finding (strength/weakness)	Stakeholders have been and continue to be involved in the development of the HCVFs on the Ngombé FMU.				
Criterion 9.3 Measures to maintain and enhance high conservation value attributes					
Conformance		Non conformance	X	NCR #(s)	16/14 & 17/14
Finding (strength/weakness)	IFO has identified measures to protect HVCs, but stakeholders want to work with IFO to make it better. Not all stakeholders have received a copy of the summary of the management plan dealing with the management of high conservation values.				
Criterion 9.4 Monitoring to assess effectiveness					
Conformance		Non conformance	X	NCR #(s)	18/14
Finding (strength/weakness)	An annual monitoring of the implementation of HCV protective measures and HCV status is performed annually. However, the audit team found that the personnel of the subcontractor who is responsible for identifying some HVCs, that is to say the shoreline before the operation is not trained properly.				
PRINCIPLE 10: Plantations					
No plantation, not applicable					

3.3. Identified non-conformances and Non Conformity Reports (NCRs)

A non-conformance is a discrepancy or gap identified during the assessment between some aspect of the FME's management system and one or more of the requirements of the forest stewardship standard. Depending on the severity of the non-conformance the assessment team differentiates between major and minor non conformances.

- **Major non-conformance** results where there is a fundamental failure to achieve the objective of the relevant FSC criterion. A number of minor non-conformances against one requirement may be considered to have a cumulative effect, and therefore be considered a major nonconformance.
- **Minor non-conformance** is a temporary, unusual or non-systematic non-conformance, for which the effects are limited.

Major non conformances must be corrected **before** the certificate can be issued. While minor non-conformances do not prohibit issuing the certificate, they must be addressed within the given timeframe to maintain the certificate.

Each non-conformance is addressed by the audit team by issuing a non conformity report (NCR). NCRs are requirements that candidate operations must agree to, and which must be addressed, within the given timeframe of a maximum of one year period.

NCR#:	01/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 1.1.9			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<p><u>Summary:</u> The standard requires that the forestry entity ensures that its subcontractors, according to the FLEGT standard:</p> <ul style="list-style-type: none"> – Are legally registered in accordance with current regulations, – Have the necessary licenses <p><u>Finding:</u> IFO has implemented a system for monitoring the legality based on obtaining legal documents: declared business contract, as patent of the current year, the tax identification number, registration number with CNSS, trade register and profession approval if applicable. IFO consistently asks its suppliers all these documents which must be renewed annually. During the document review, the auditors found that some contractors had not submitted an updated file but IFO continued to outsource some of its operations to these companies.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> – Interviews with the Head of tracking subcontractors – Review of legality records of each subcontractor 				
Corrective Action Request:	<p>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>			
Timeline for Conformance:	12 months after the issuance of the certificate			
Evidence Provided by Organization:	PENDING			
Findings for Evaluation of	PENDING			

Evidence:	
NCR Status:	OPEN
Comments (optional):	

NCR#:	02/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 1.6.3			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<p><u>Summary:</u> Subcontractors, local and indigenous communities [...] should be aware of the standard requirements and consequences of its implementation on long-term forest management.</p> <p><u>Finding:</u> Communities: The auditors find that if more sampled communities are aware of the requirements of the FSC standard, others had never heard of it.</p> <p><u>Evidence:</u> – Meetings with communities.</p>				
Corrective Action Request:	<p>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>			
Timeline for Conformance:	12 months after the issuance of the certificate			
Evidence Provided by Organization:	PENDING			
Findings for Evaluation of Evidence:	PENDING			
NCR Status:	OPEN			
Comments (optional):				

NCR#:	03/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 4.1.7			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<p><u>Summary:</u> The standard requires that the forestry entity contributes to the development of the local economy while respecting its particular specifications of the agreement, the requirements set/granted and the national standards.</p> <p><u>Finding:</u> IFO contributes to the development of the local economy including through three separate operations, being the specifications, the purchase of wood from the SDC, and the Local Development Fund (LDF). But the LDF is dysfunctional, with operating costs of over 50% in 2010, poor accounting (account statements difficult to reconcile, distinguishing between operating expenses and investments in microprojects, etc.) and insufficient support for microprojects resulting in a high failure rate. The fundamental cause of the lack of sustainability of micro-projects is the lack of a technician dedicated to assisting beneficiaries. The Consultative Committee plans to recruit this technician for almost two years now.</p>				

Evidence: Interviews and visits to projects in villages; Interviews with members and delegates of the Consultative Committee; Interviews with IFO staff; RapMission_N°01.2014.LDF_2(ST) Annexe CR Mission_01.2014.LDF_vf Monitoring of revenues and expenditures of LDF LDF ledger accounts	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	12 months after the issuance of the certificate
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR#:	04/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 4.2.2			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<u>Summary:</u> The standard requires the forest manager to take practical steps to supply its workers with products and food of good quality according to local mercurial.				
<u>Finding:</u> IFO has signed partnership agreements with three merchants to whom it provides local electricity through a reduction in sale prices of commodities. However, the auditors noted that these partnerships are not adequately monitored by IFO because it is not possible at this stage to verify the compliance with the commitments made by the various partners. For example, trade partners are not able to present a clear picture of the difference between the prices charged by other traders in the Ngombé site and those charged by them. It should also be noted that despite the fact that the contract emphasizes the hygiene and cleanliness of the premises, the butcher shop was not clean with black water flows to the ground under the freezers which for some were rusted.				
<u>Evidence :</u> – Interviews with IFO employees – Price grid review – Economats' visit				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.			
Timeline for Conformance:	12 months after the issuance of the certificate			

Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR#:	05/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 4.2.9			
Report Section:	Appendix II			

Description of Non-conformance and Related Evidence:	
<p><u>Summary:</u> The standard requires that forest managers put in place a written emergency management plan in the event of a serious accident suffered by a forest worker or contractor, and which includes a provision allowing rapid evacuation to a medical facility with appropriate equipment</p> <p><u>Finding:</u> IFO has implemented an evacuation procedure to various medical facilities depending on the severity of the emergency for its Ngombé site. However, the auditors noted that there is no appropriate means of evacuation to medical facilities in case of emergency.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> - Interviews with the HSE Manager, the CMS Physician - Documentary Review - CMS installations' visit 	

Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
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Timeline for Conformance:	12 months after the issuance of the certificate
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR#:	06/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 4.4.5			
Report Section:	Appendix II			

Description of Non-conformance and Related Evidence:	
<p><u>Summary:</u> The indicator says that the forest manager must provide copies of the summary of the management plan (to include a section on the HCVs sites and the measures taken to protect them) to representatives of the communities and riparian wildlife management units (UGF).</p> <p><u>Finding:</u> The forest management plan is summarized in the form of laminated sheets. During meetings in the villages,</p>	

the auditors found that such a summary was not available. Auditors do not doubt that these documents have once been distributed to villagers, but over the years with changes in the leadership of the villages, it is possible that these documents were lost. IFO staff said it would provide workbooks to help villagers manage their documents. Nevertheless, the requirement of the indicator is not yet reached.

Evidence:

- Sampling of seven villages
- Interviews with the manager
- Plasticized summaries of the forest management plan

Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	12 months after the issuance of the certificate
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR#:	07/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 4.6.2			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<p><u>Summary:</u> Workers cannot be subject to discrimination in relation to the recruitment, promotions, layoffs, pay and employment in the context of social security.</p> <p><u>Finding:</u> Some workers interviewed by the auditors said they felt there was discrimination in relation to hiring and promotion. The auditors noted that vacancies were not adequately reported (e.g. display at the IFO level; local newspapers) and for some positions at the national level were not informed of the vacancy (e.g. DG vacancy).</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> - Interviews with stakeholders 				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.			
Timeline for Conformance:	12 months after the issuance of the certificate			
Evidence Provided by Organization:	PENDING			
Findings for Evaluation of Evidence:	PENDING			
NCR Status:	OPEN			

Comments (optional):	
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NCR#:	08/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 6.2.14			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<p><u>Summary:</u> The company monitors and evaluates the effectiveness of control measures to enable improved control systems.</p> <p><u>Finding:</u> IFO has no mechanism in place to monitor the effectiveness of measures implemented for the protection of wildlife. This mechanism should allow improved control systems when they are proven ineffective.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> - Interviews with staff - Interviews with ecoguards - Interviews with partners of PROGEP - Summary of activities of the eco-guards' team since 2012 				
Corrective Action Request:	<p>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>			
Timeline for Conformance:	12 months after the issuance of the certificate			
Evidence Provided by Organization:	PENDING			
Findings for Evaluation of Evidence:	PENDING			
NCR Status:	OPEN			
Comments (optional):				

NCR#:	09/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 6.3.3			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<p><u>Summary:</u> Exploited species that exhibit an abnormal break in the size distribution classes must be subject to monitoring and specific measures.</p> <p><u>Finding:</u> IFO has implemented measures to reduce the pressure on the species exploited that is to say, the maintenance of seed trees, a very careful selection of rods in order to fell only the stems of very good potential for sawing and increased operating diameters. In the next rotation, there will be a decrease in the abundance of certain species harvested. According to IFO, this decrease is natural and these species would decline whether or not exploited. It has not been shown that this assumption is based on a credible analysis based on the latest scientific knowledge.</p> <p>To assess the relevance and strength of measures to be applied to these species, we must first establish</p>				

future goals for the distribution and abundance of these species in line with the natural processes of succession of forest cover. For now, IFO has no such objectives. Thus, it is not shown that the monitoring and the current measures for exploited species are in conformance with the requirements of the standard.

Evidence:

- Forest management plan
- Interviews with experts
- Staff interviews with the applicant.

Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	12 months after the issuance of the certificate
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR#:	10/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 6.4.2			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<p><u>Summary:</u> Conservation areas established by the forest manager contain representative samples of ecosystems in their natural state as identified in 6.4.1.</p> <p>The management requirements must be defined in the management plan of the UGF and other documents to maintain representative samples of ecosystems within conservation areas in their natural state.</p> <p><u>Finding:</u> More than 28% of the FMU area is protected in the FMU while the standard requires a minimum of 10%. However, it has not been demonstrated that the current conservation areas are representative of the natural ecosystems of the FMU and they are planned to be maintained in their natural state.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> - Identification and protection of representative ecosystems - Interviews with IFO staff 				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.			
Timeline for Conformance:	12 months after the issuance of the certificate			
Evidence Provided by Organization:	PENDING			
Findings for Evaluation of Evidence:	PENDING			
NCR Status:	OPEN			

Comments (optional):	
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NCR#:	11/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 6.5.3			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<u>Summary:</u> All sites where significant erosion or other forms of significant degradation of soil and water are rehabilitated are found.				
<u>Finding:</u> Sites degraded due to rutting and compaction are not rehabilitated. Wood parks and 2013 skid trails and of summer 2014 that showed a significant level of rutting were visited. They had not been restored and restoration of these sites was not envisaged, according to interviews conducted. Due to the high amount of precipitation in the period of the audit, the ruts created accumulations of water that became unsuitable for regeneration. The audit team concluded that the sites where degradation is recognized due to rutting and compaction are not always adequately rehabilitated.				
<u>Proof:</u>				
<ul style="list-style-type: none"> - Field visits - Interviews with IFO staff 				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.			
Timeline for Conformance:	12 months after the issuance of the certificate			
Evidence Provided by Organization:	PENDING			
Findings for Evaluation of Evidence:	PENDING			
NCR Status:	OPEN			
Comments (optional):				

NCR#:	12/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 6.7.1			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<u>Summary:</u> Adequate facilities must be available for the collection and transport of non-organic waste;				
<u>Finding:</u> Adequate facilities are not available for the collection and storage of non-organic waste: the auditors find that machinery drivers entering the forest, e.g. for logging or the layout of bulldozer skid trails, do not have in their possession the appropriate equipment in order to collect oil that can spill from the machinery in case of breakage. This equipment is available, but not on the machines themselves in case of an emergency.				
<u>Evidence:</u>				
<ul style="list-style-type: none"> - Area code of reduced impact logging (FAO) - Interviews with IFO staff 				

– Visit of plant and forest facilities	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	12 months after the issuance of the certificate
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR#:	13/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 7.1.11			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<p><u>Summary:</u> The standard requires that the management plan and/or supporting documents include a description and justification of technical and operating equipment.</p> <p><u>Finding:</u> Written procedures for forest activities (exploration, tracking, logging, skidding, hauling...) describe the technical progress of these activities but lack the equipment used (e.g. skidding and hauling equipment is neither presented nor justified). It also lacks the description of the driving techniques of certain activities such as handling the forest park, evacuation etc. and the description of the equipment used. Officials of the operating site surveyed on this issue could not give the reasons for the choice of materials used.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> – Interviews with the Head of Operations – Documentary Review – Logging site visit 				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.			
Timeline for Conformance:	By the next annual audit			
Evidence Provided by Organization:	PENDING			
Findings for Evaluation of Evidence:	PENDING			
NCR Status:	OPEN			
Comments (optional):				

NCR#:	14/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 7.3.5			

Report Section:	Appendix II
Description of Non-conformance and Related Evidence:	
<p><u>Summary:</u> The standard requires that the policies and procedures make the skills the basis of all recruitment, promotion or staff training at all levels.</p> <p><u>Finding:</u> The IFO training policy provides that after each training, trained employees benefit from advancements and these are according to the provisions of the Labour Code. The recruitment policy requires for the competence to be given priority when recruiting but the job descriptions describing the desired profiles at the workplace are not available. It is therefore not possible to make a clear link between the profile of existing workers and the company's vision.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> - Interviews with the Personnel Manager - Documentary Review 	
Corrective Action Request:	<p>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>
Timeline for Conformance:	By the next annual audit
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR#:	15/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 7.4.2			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<p><u>Summary:</u> The summary should include a specific section on the presence of high conservation value sites within the FMU, and the measures taken to improve or maintain them.</p> <p><u>Finding:</u> The summary of HCVs present within the FMU is present in a separate document but not in a specific section of the summary of the management plan as required by the standard.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> - Summary of management plan 				
Corrective Action Request:	<p>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>			
Timeline for Conformance:	12 months after the issuance of the certificate			
Evidence Provided by Organization:	PENDING			

Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR#:	16/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 9.3.1			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<p><u>Summary:</u> At the forest management unit level, management decisions regarding high conservation values should be taken in a concerted manner according to the precautionary principle.</p> <p><u>Finding:</u> Management decisions regarding shoreline were not taken in a concerted manner.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> - Recommendations in relation to the protection of clearings. - EFIR procedures and HCVF report - Interviews with IFO staff - Interviews with stakeholders 				
Corrective Action Request:	<p>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.</p>			
Timeline for Conformance:	12 months after the issuance of the certificate			
Evidence Provided by Organization:	PENDING			
Findings for Evaluation of Evidence:	PENDING			
NCR Status:	OPEN			
Comments (optional):				

NCR#:	17/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 9.3.4			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<p><u>Summary:</u> Consulted stakeholders should have received a copy of the summary section of the management plan and/or supporting documents, dealing with the management of high conservation values.</p> <p><u>Finding:</u> WCS and other organizations involved have received copies of the documents dealing with HCVs. However, the auditors found that none of the leaders of the seven villages sampled had a copy of the maps in progress or prepared in the past, nor do they have copies of management plans or annual operating plan covering their territory.</p> <p><u>Evidence:</u></p>				

– Interviews with stakeholders	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	12 months after the issuance of the certificate
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR#:	18/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-STD-RoC-01-2012 Republic of Congo Natural Plantations, Indicator 9.4.4			
Report Section:	Appendix II			
Description of Non-conformance and Related Evidence:				
<p><u>Summary:</u> All staff should be informed and trained in the implementation of the requirements of Principle 9.</p> <p><u>Finding:</u> Inventory and tracking teams are responsible for identifying sensitive areas such as the baïs, the yangas and the marshes before the operation. However, the inventory teams are the only ones to go through almost all the operating sectors in order to characterize the trees. Interviews with IFO staff indicate that these teams who are hired by a subcontractor, are not trained to identify different baïs. In 2013, a baïs was identified by WCS in the operated area in 2011 and the protection arrangements had not been applied. This case is an indication that the identification of the baïs is deficient, but no corrective action was implemented, the audit team concluded that the personnel responsible in identifying some HCVs before the operation is not trained properly.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> – Interviews with the applicant – Interviews with stakeholders – EFIR procedures and HCVF report 				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.			
Timeline for Conformance:	12 months after the issuance of the certificate			
Evidence Provided by Organization:	PENDING			
Findings for Evaluation of Evidence:	PENDING			
NCR Status:	OPEN			
Comments (optional):				

3.4. Observations

Observations are very minor problems or the early stages of a problem which does not of itself constitute a nonconformance, but which the auditor considers may lead to a future nonconformance if not addressed by the client. An observation may be a warning signal on a particular issue that, if not addressed, could turn into a NCR in the future (or a pre-condition or NCR during a 5 year re-assessment).

OBS 1.1.1/14	Reference Standard & Requirement: Indicator 1.1.1
The auditors found that the professional identity card of the wood and forest for the new director is no longer updated since 2013, but that IFO made its renewal application for the new director. This is a formality, and therefore a simple observation.	
Observation: IFO should ensure that the professional identity card is renewed.	

OBS 2.2.2/14	Reference Standard & Requirement: Indicator 2.2.2
The auditors found that the information sessions delivered to villages by the IFO social workers does not clearly cover the notion that the villages control their rights and resources beyond the SDC. The auditors also noted uncertainties in some villages in regards to their rights on production series. Yet in fact, auditors find that the rights are recognized and respected beyond SDC, among others through social mapping process.	
Observation: IFO should ensure that all communities neighboring the FMU understand that they can control the impact of forestry operations on their right and resources on all of their land, in the series of production, beyond the SDC.	

OBS 3.1.14/14	Reference Standard & Requirement: Indicator 3.1.14
The auditors find that in villages where more than one indigenous ethnic group is represented, IFO ensures that representatives of each ethnic group are present at during events. The IFO social mapping procedure provides for the creation of two maps, one for the Bantu and for indigenous people, when the two ethnic groups are present on the same land. However, this procedure does not provide for the realization of different exercises for each indigenous ethnic group present in the same village. In fact, when more than one indigenous ethnic group is present consent is obtained from the group representing all Aboriginal people, not each ethnic group separately. Each ethnic group is a distinct Aboriginal population and according to the FSC standard the consent of each ethnic group must be obtained.	
However, since representatives from each indigenous ethnic group is present when consent is given, it can be considered that the consent of each is obtained.	
Observation: IFO should make sure to obtain the consent of each indigenous people individually when several indigenous ethnic groups are present on the same land.	

OBS 4.1.7/14	Reference Standard & Requirement: Indicator 4.1.7
The auditors find that some health centers, like Attention, often lack nurses and fear that the villagers are left with drugs without any expertise to administer them. This represents a significant risk to the health of the villagers. IFO is to ensure that the local development funds be used in 2014 to supply drugs in health centers that were built according to the specifications. The villages have also begun to develop drug lists that the FLD will be able to buy for them. The auditors find that some health centers, like Attention, often lack nurses and fear that the villagers are left with drugs without any expertise to administer them. This represents a significant risk to the health of the villagers.	
Observation: IFO should ensure not to distribute drugs in villages where nurses are lacking.	

OBS 4.2.1/14	Reference Standard & Requirement: Indicator 4.2.1
<p>The auditors found that ecoguards did not use protective equipment when handling dead animals. The auditors believe that ecoguards are at risk of disease and mostly becoming important infectious agents, since they are in contact with the population and carcasses transported through their guardhouse. However these are not the IFO employees nor contractors.</p>	
<p>Observation: IFO should support ecoguards with some basic safety equipment.</p>	

OBS 4.2.3/14	Reference Standard & Requirement: Indicator 4.2.3
<p>All IFO employees and subcontractors were made aware on issues related to working accidents and their support by the company and the CNSS. These awareness campaigns have also extended the management aid kit the hygiene, health and safety, waste management and handling of chemicals, forest emergencies and use of emergency kits, the use of fire extinguishers procedures, controlled felling, the EFIR techniques, environmental impacts, work commitments and work contracts.</p>	
<p>However, the auditors found that expatriate employees of a subcontractor do not know the eligible legal requirements for social insurance in the event of a work stoppage for any reason whatsoever.</p>	
<p>Observation: IFO should take steps to inform its employees and subcontractors in the process of obtaining social insurance in case of permanent work stoppage. For foreign workers, IFO should ensure that the international agreements are in place between the Congo and the country of origin of the workers so that they can effectively benefit from their contributions.</p>	

OBS 6.2/14	Reference Standard & Requirement: Indicator
<p>A memo from the Minister of Forests settled on the issue of ownership of research results on the FMU. This decision goes against what WCS was negotiating. Following discussions with WCS, auditors notice it possible that WCS completely stops its support research activities to the coordinator of ecoguards and funding on the FMU. This would represent a significant problem for the conformance of IFO on wildlife aspects. The end of the WCS contribution to the wildlife inventory, to financing ecoguards and support coordinator ecoguards, which represents €100,000/year should then be filled by IFO or a new partner. The portion of this amount dedicated by WCS in support of ecoguards is €25,000, which in the event of withdrawal will be amply filled by the recent IFO commitment up to 100.000 to €150.000 to increase the capacity of ecoguards. This commitment by IFO reduces the impact of a potential withdrawal of WCS from hunting control on the FMU. Because WCS is always present and that so the problem does not arise again, an observation (6.2/14) was issued in order for IFO to maintain the wildlife research and monitoring activities of hunting control on the FMU in the event of the withdrawal of WCS.</p>	
<p>Observation: In the event of the withdrawal of a partner of the PROGEP, IFO should maintain the hunting control and wildlife research activities in the FMU.</p>	

NOTE 2.3.2/14	Reference Standard & Requirement: Indicator 2.3.2
<p>The delegate of a village in the SDC Consultation Committee was denied the addition of an important subject for his village (need of a school and a health center) to the agenda of the committee meeting in August 2014. The auditors contacted the Chairman of the SDC Consultation Committee, who assured them that these subjects would be on the agenda of the next meeting. During the next audit the auditors should verify that the process to include items on the agenda is known and respected by delegates and other members of the Consultative Committee.</p>	

NOTE 4.2.2/14	Reference Standard & Requirement: Indicator 4.2.2
<p>Verify that the available doctor or a subcontracted physician at the Ngombé CMS is a surgeon.</p>	

NOTE 4.2.7/14	Reference Standard & Requirement: Indicator 4.2.7
<p>Verify the existence of an active work camp within the Ngombé FMU and observe the installations' conditions.</p>	

NOTE 9.2.2/14	Reference Standard & Requirement: Indicator 9.2.2
<p>Verify during the 1st annual audit that IFO worked with stakeholders to update the issue of baïs.</p>	

NOTE 6.3.5/14	Reference Standard & Requirement: Indicator 6.3.5
Verify in future audits, if necessary, silvicultural treatments are implemented for species exploited in line with the future goals of forest composition.	

NOTE 6.4.5/14	Reference Standard & Requirement: Indicator 6.4.5
Verify how IFO considered habitat and distribution of threatened species to determine the size and location of conservation areas.	

NOTE 8.1.4/14	Reference Standard & Requirement: Indicator 8.1.4
Verify the resources available to post-operational monitoring teams.	

3.5. Certification Recommendation

Based on a thorough review of FME performance in the field, consultation with stakeholders, analysis of management documentation or other audit evidence the Rainforest Alliance assessment team recommends the following:

Certification requirements met; Upon acceptance of NCR(s) issued above	<input checked="" type="checkbox"/>
Certification requirements not met	<input type="checkbox"/>
Subject to conformance with minor NCRs (if applicable), the FME has demonstrated that their described system of management is being implemented consistently over the whole forest areas covered by the scope of the evaluation	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments:	
FME's management system, if implemented as described and subject to conformance with minor NCRs (if applicable), is capable of ensuring that all the requirements of the certification standards are met across the scope of the certificate	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments:	
Issues identified as controversial or hard to evaluate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: The silvicultural and cutting level issue, because of deficiencies in scientific knowledge about the dynamics of the tropical forests of the Congo Basin. NCR 6.3.3/14 is issued.	
Description of activities taken by the FME prior to the certification decision to correct major or minor nonconformity(s) identified during the assessment.	
Certificate type recommended:	<input checked="" type="checkbox"/> Forest management and Chain of custody <input type="checkbox"/> Forest management only (no CoC)

Once certified, the FME will be audited annually on-site and required to remain in conformance with the FSC principles and criteria as further defined by regional guidelines developed by Rainforest Alliance or the FSC in order to maintain certification. The FME will also be required to fulfill the corrective actions as described below. Experts from Rainforest Alliance will review continued forest management performance and conformance with the corrective action requests described in this report, annually during scheduled and/or random audits.

4. CLIENT SPECIFIC BACKGROUND INFORMATION

4.1 Ownership and land tenure description (legal and customary)

The Ngombé FMU is a public territory under private forest concession management. A Development Series (SDC) is located along the roads and around villages located within the concession. IFO has no rights to the SDC but through an agreement with the communities, IFO harvests particularly focused on maintaining the values and resources of communities identified through participatory mapping.

4.2 Legislative and government regulatory context

Ngombé FMU is subject to an industrial wood processing contract (n°5/MEFPRH/DGEF/DF-SGD) established December 14, 1999 between the Government and the "IFO Company".

According to Article 60 of Law No. 16-2000 on the Forest Code, « *Le Plan d'Aménagement d'une unité forestière d'aménagement faisant l'objet d'une convention d'aménagement et de transformation est établi et révisé d'accord parties. Il a valeur de document contractuel.* »

Since the approval of the management plan the industrial wood processing contract has been replaced by a "management and processing agreement" under Article 67 of Law No. 16-2000 on the Forest Code. According to the same article, « *la durée de cette convention ne peut excéder 25 ans* » et « *elle est renouvelable indéfiniment, sauf faute de l'attributaire, constatation du dépérissement des peuplements ou de la raréfaction d'une essence ou motif d'intérêt public.* »

4.3 Environmental Context

Excerpt from the 2007 Management plan:

The Ngombé FMU is very rich in biodiversity, with the presence of large protected animals such as the elephant, the gorilla, the chimpanzee and the leopard.

The FMU is part of the semi-humid equatorial climate zone, which covers the entire northern part of Congo located north of the Equator.

The short rainy season from April to June and the short dry season from July to August are less pronounced. The main dry season is quite pronounced with less than 50 mm of rain in February and 100 mm of rain in January and March.

Geologically, the western FMU is located in the Central Africa basin region and the east of the FMU is in the region of the Congo Basin. In the geomorphological area of the Congo Basin, wind and fluvial unconsolidated recent sediments of Tertiary and Pleistocene eras are covered with Quaternary surficial formations (alluvium) corresponding to the actual basin. The geomorphological region of Central Africa to the west of the FMU consists of ancient Precambrian sedimentary formations of the average (grés schiste System of the Ouessou-Sembé Series) and eruptive (dolerite) more or less covered with secondary formations (Carnot sandstone) and tertiary (clay-sandy series of Bambio plateaus). The parent material consists of intrusive acids rocks such as granite, diorite, quartz, porphyria, syenite and gneiss.

On the Ngombé FMU, there are two types of terrain: a hilly area north of the FMU, and west of the SANGHA PALM concession, where the altitude reaches 400 m (called "rolling hills and peneplains on series of horizontal sandstone" on the geomorphological map) a vast expanse of plains east and south, where the altitude does not exceed 400 m (corresponding to other units of the geomorphological map). The assembly of the FMU is located on a relatively flat area. The lack of slope over large distances is the origin, flow fault, of the formation of vast wetlands.

With the exception of a few non-forest areas, savannah, human settlements, cultures and fallow over the beds of water, Baïs and Yanga, bare soil, all of Ngombé FMU is covered by forests owned by the Yangambi classification to humid evergreen forests and forest formations closed under the main arm of the soil (permanently flooded swamp forests and periodically flooded forests). In the land-based forest area are clearly distinguished by two major groups: the dense forests on the one part and the

Marantaceae and transition clear forests on the other part. There are also different stages of development or degradation of these forests, intermediate forms and training related to specific ecological conditions (hydromorphic soils).

4.4 Socioeconomic Context

Excerpt from the 2007 FMP and the Environmental and Social Impact Assessment (Auzel P., 2008):

On the managed Ngombé FMU as defined by the forest management plan, the population in 2007 was estimated at 7,263 people, or:

- 4,106 Ngombé inhabitants;
- 3,340 inhabitants in the rural riparian zone.

The rural population of the Ngombé FMU is concentrated along the main communication routes, distributed in 103 villages more or less important. A large floating population temporarily occupies numerous hunting, agriculture and fishing camps. The rural population is young.

In total, an ethno-linguistic and cultural mosaic of almost 50 different groups made up the human landscape of the initial FMU.

The Ngombé population is mainly foreign, but more than half of the residents however are from the northern Congo. As in Ouessou, the Bakwele group is the actual dominant number (41%). Of the total population of the Ngombé site, indigenous people groups represent only 3% of the total population.

The rural population is characterized by the predominance of the Bakwele group (34%) and in similar proportion, semi-nomadic populations' groups (29.5%), and then – in a very inferior number - the very early implanted Bonguili group (7 %).

Forest-based population activities:

Direct employment induced by the presence of the IFO company represent a significant payroll directly affecting some 3,000 Ngombé people.

Peasant agriculture at the Sangha level is practiced mostly by women. The traditional agricultural area of the Sangha covers only a small area of the territory of the Department (0.11% or 6,000 ha). This reflects the weakness of this activity at the Department level, which explains the massive imports of food products notably from Cameroon. This is particularly the case of the cassava flour, commonly called "garigombo".

Fishing

Fishing is one of the most practiced craft activities in the department. It is focused on the major rivers, namely the Sangha, Ngoko the Mambili and Lengoué. According to socio-economic surveys conducted by IFO in 2004, 120 to 180 people engaged in fishing as the main activity within the Ngombé FMU. Despite this limited number of fishermen (Aboriginal tradition required), there are some important fishing poles for example on the Sangha around OUESSO, POKOLA and downstream of the center latter (up PIKOUNDA).

Hunting

Hunting is the most common traditional activity in the department, and is the most important source of animal protein for the people of the Sangha.

Livestock

Livestock is a limited activity and essentially masculine. This is usually a small breeding box (poultry, sheep and goats)

Craft

Despite the embryonic state of the sector, we meet artisans in almost all areas and throughout the department.

The most dynamics are stonemasons, brick makers, weavers, sculptors, furniture manufacturers,

masons, tailors, charcoal makers.

Non Timber Forest Products (PFNL) operations

The uses of PFNLs in the Ngombé FMU are, like the entire Congo Basin, very numerous and diverse. Gathering products are designed for both home consumption and trade to obtain additional income. It is important to remember that in terms of biological sampling and economic and social impact, the main PFNLs in the Ngombé FMU remains by far the game.

4.5 Workers

Number of workers including employees, part-time and seasonal workers:

Total workers	1050 workers (provide detail below)	
- Local Full time employees (a:b)	969 Male	23 Female
- Non - Local Full time employees (c:d)	57 Male	1 Female
- Local Part time workers (e:f)	0 Male	0 Female
- Non- local part time workers (g:h)	0 Male	0 Female
Worker access to potable water on the work site	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Full time employees making more than \$2 a day	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Number of serious accidents (past 12 month period)	21 at >= 8 jours (October 1, 2013 → September 30, 2014)	
Number of fatalities (past 12 month period)	0	

APPENDIX I: Public summary of the management plan

(NOTE: To be prepared by the client prior to assessment, Information verified by assessment team)

1. Main objectives of the forest management are:	
Primary priority:	income from harvesting and sales of roundwood
Secondary priority:	biodiversity and increasing of nature values
Other priorities:	Source of raw material for embedded processing; ;
Forest composition:	
The entire FMU is covered by the ombrophilous evergreen dense forest of the Guinea-Congo region. The two main forest types are dense forests and Marantaceae and transition open forests.	
Description of Silvicultural system(s) used:	
The silvicultural system used is based on a 30 year rotation cycle. The UFP were divided into surfaces with an equivalent volume of main species.	
2. Silvicultural system	% of forest under this management
Even aged management	ha
Clearcut (clearcut size range)	ha
Shelterwood	ha
Uneven aged management	ha
Individual tree selection	100%
Group selection (group harvested of less than 1 ha in size)	ha
Other types of management (explain)	ha
3. Forest Operations	
3.1 Harvest methods and equipment used:	<p>The selected tree is standing. Once tracked it was felled, logged and skidded to a timber yard. The wood is then prepared and loaded onto timber trucks for transport to the IFO processing plants.</p> <p>The equipment used includes:</p> <ul style="list-style-type: none"> - Chainsaws - Bulldozers - Skidders - Loaders/Range - Logging trucks - Staff bins and Pick Ups - Mechanical maintenance equipment - Fuel tank <p>For the maintenance of roads IFO also has bins, buckets and graders.</p>
3.2 Estimate of maximum sustainable yield for main commercial species:	Average of 258'842 m3 per year for 30 years throughout the FMU
3.3 Explanation of the assumptions (e.g. silvicultural) upon which estimates are based and reference to the source of data (e.g. inventory data, permanent sample plots, yield tables) upon which estimates are based upon.	
<p>The management method proposed is of a management capacity with volume indication.</p> <p>The choice of the DMA (minimum diameter of management) was established with the objective to obtain a minimum recovery rate of 50% on the numbers of all objective species for a rotation.</p> <p>How the management inventory was carried out according to the "National Guidelines for sustainable management of natural forests of the Congo."</p>	

The DMA withheld exceeds the DME (minimum diameter of operation) prescribed by law. Also to preserve the resource and limit the magnitude of damage on a parcel, the felling density by parcel was set at a maximum of 2.5 feet per hectare.

The average withdrawal in the Ngombé FMU is 6 m³/ha or 0.6 feet per ha, in the annual allowable cut (1/30 of the total area).

3.4 FME organizational structure and management responsibilities from senior management to operational level (how is management organized, who controls and takes decisions, use of contractors, provisions for training, etc.).

The organizational structure of IFO includes a Director General who is responsible to the board of directors.

The Director General oversees the Heads of different departments, such as the Forest Officer, the Sawmill Director, the Chief Financial Officer, the Technical Director, the Social Environment and Certification Director and those responsible for other services (logistics, maintenance/Garage, Mechanical Workshop, Electrical Workshop, Construction).

The Management Service is overseen by an Environmental Director for forestry and environmental aspects in close collaboration with the Forestry Manager and a Forestry Engineer. The management cell reports to the Chief Financial Officer.

3.5 Structure of forest management units (division of forest area into manageable units etc.).

FMU (Forest Management Unit) assigned to IFO is divided into 6 UFP (Forest Production Units).

Each UFP is divided into AAC (Annual Allowable Cuts) of 4 to 6 years, depending on the size of the UFP.

The duration of a complete operation rotation of the FMU was set at 30 years.

3.6 Monitoring procedures (including yield of all forest products harvested, growth rates, regeneration, and forest condition, composition/changes in flora and fauna, environmental and social impacts of forest management, costs, productivity and efficiency of forest management).

Any logging and sawmill operations are subject to strict monitoring. The tools used are:

- Sheets of seizures
- Internal software monitoring – Gestion Bois (monitored since the foot in the forest and all the activities of the mill and export)
- Permanent parcels inventoried every 2/3 years
- Control of tracking activities, skid trail
- Monthly control of felling quality
- Systematic control of the width of roads built
- Functional team in place and attributed to post diagnosis operation
- After logging; control of the number and the felled strains

3.7 Management strategies for the identification and protection of rare, threatened and endangered species.

The FMU has been divided into different types of series. The protection and conservation series are devolving on the protection of rare, threatened or vulnerable species. Within the FMU, 29% of the area is found within the protection and conservation area.

These areas were defined in sensitive ecotypes known for harboring rare, threatened or vulnerable species.

The lists of rare species are available from the IUCN red lists for the Congo and from the CITES for the Congo. Then, the operating inventories carried out, at least, one year before the passage of logging, to identify and protect rare species.

3.8 Environmental safeguards implemented, e.g. buffer zones for streams, riparian areas, seasonal operation, chemical storage, etc.

Operational procedures, compiled from national management standards and from recognized regional codes (FAO type), are established. These procedures establish the environmental protection rules for forestry activities.

Among these measures, some environmentally sensitive areas are excluded from the operation like steep slope areas greater than 40%, rocky outcrops, wetlands or conservation series.

Streams are protected by a buffer zone on either side, the width of which varies according to the size of the stream to be protected. Ranging for example from a buffer zone of 15 m on both sides to a stream under 2 m wide and 50 m on either side for a river superior to 10 m. The Baïs are protected with a minimum of 150 m.

Active camps and the sources used and identified as such, by the villagers, they benefit from a buffer area of 50 m.

All protection areas are materialized by means of paint on the field.

Other Sections may be added by the FME

