

## Validation Report ROUGIER GABON

Date: 16/04/09

The Board of Experts declares that it has validated the FSC certificate for the FMU's of Haute Abanga, Ogooué-Ivindo and Léké, including Chain of Custody, against the criteria as laid down in the Keurhout Protocol for the Validation of Sustainable Forest Management, version August 31st, 2007:



This report may only be issued integrally

The following documents and materials have been included in the validation:

- BVC, 2007. FSC Certification Stakeholders Consultation for Rougier Gabon.
- BVC, 2007. Système de Certification FSC. Rapport de Certification. Certification de Chaîne de Contrôle, Rougier Gabon, Scierie de Mbouma-Oyali – Usine d'Owendo
- BVC, 2007. Système de Certification FSC. Rapport d'Audit Initial. Certification de Gestion Forestière. Rougier Gabon.
- BVC, 2007. Certificate for NF EN ISO-14001: 2004 for Rougier Gabon, FMU's Haute Abanga, Ogooué-Ivindo and Léké, offices and storage at Oloumi Libreville.
- BVC, 2007. Certificate for NF EN ISO-14001: 2004 for Rougier Gabon, Sawmill Mbouma-Oyali in Franceville
- BVC, 2008. Rapport d'audit ISO14001 Version 2004 du 04 au 10 Juin 2008.
- BVC, 2008. Système de Certification FSC. Rapport d'audit Complémentaire 1 (2-11 juin 2008). Certification de Gestion Forestière. Rougier Gabon.
- BVC, 2008. Système de Certification FSC. Rapport d'audit Complémentaire 2 (8-11 septembre 2008). Certification de Gestion Forestière. Rougier Gabon.
- COFRAC, 2007. Accreditation Certificate for ISO/IEC 17021 for BVC France.
- FCBA, 2008. Certificate for CoC FCBA-COC-000085 for Rougier International.
- FSC, 2005. Accreditation Certificate for FSC for the Eurocertifor Certification Program of BVQI France.
- BVC, 2008. Certificate for Forest Management BV-FM/COC-603917 for Rougier Gabon, FMU's Haute Abanga, Ogooué-Ivindo and Léké.
- BVC, 2008. Certificate for Chain of Custody, BV-COC-603917 and BV-CW-603917 for Rougier Gabon, Sawmill Mbouma-Oyali in Franceville, Plywood factory Owendo in Libreville.
- FSC, 2002. Forest Management Standard FSC-STD-01-001, version 4.0 (EN)
- FSC, 2008. Forest Management Standard RF03 FSC Gabon, version 1.2
- FSC, 2008. FSC Chain of Custody standard FSC-STD-40-004, version 2.0
- FSC, 2007. FSC CoC Controlled Wood standard FSC-STD-40-005, version 2.1
- Keurhout, 2006. KH-SFM Validation report for Rougier Gabon, FMU's Haute Abanga and Ogooué Ivindo.
- ROUGIER GABON, 2008. Action Plan FSC (September 2008)
- ROUGIER, 2008. Rougier awarded FSC certification (Press release)
- [www.bureauveritas.fr](http://www.bureauveritas.fr)
- [www.cofrac.org](http://www.cofrac.org)
- [www.fsc.org](http://www.fsc.org)
- [www.rougier.fr](http://www.rougier.fr)

Next to the documents mentioned above various other documents of the FSC System are relevant and have been taken into account in this validation as well as information provided in response to questions of Keurhout.

## GLOSSARY

BoE	Keurhout Board of Experts
BVC	Bureau Veritas Certification (CB)
CAR	Corrective Action Request
CBD	Convention on Biodiversity
CITES	Convention on International Trade in Endangered Species
CB	Certification Body
CoC	Chain of Custody
COFRAC	commission Francaise de Accréditation,
EIA	Environmental Impact Assessment
EMS	Environmental Management System
EN	European Norm
FMU	Forest Management Unit
FSC	Forest Stewardship Council
GIS	Geographic Information Systems
GO	Government Organisation
HA	Haut Abanga (FMU)
ha	hectare
IA	Initial Audit (by CB)
ILO	International Labour Organization
ISO	International Standards Organization
KH	Keurhout
KH-SFM	Keurhout Protocol for the Validation of Sustainable Forest Management
LE	Léké (FMU)
MA	Main Audit
NC	Non-Conformity
NGO	Non-Governmental Organization
NTFP	Non-Timber Forest Products
NTTA	Netherlands Timber Trade Association
OI	Ogooué-Ivindo (FMU)
PEFC	Programme for the Endorsement of Forest Certification Schemes
RCOC	CoC standard of MTCC
RG	Rougier Gabon S.A.
RIL	Reduced Impact Logging
SFM	Sustainable Forest Management
SIA	Social Impact Assessment
UNCCC	United Nations Conference on Climate Change
UNFF	United Nations Forum on Forests
VA	Verification Audit (by CB)
WCS	World Conservation Society
WWF	World Wildlife Fund

## 1) Validation process

Early 2009 Keurhout (KH) undertook a validation of FSC certificates that had been issued against the FSC standard for forest management for Gabon (RF-03 FSC GF Gabon, version 1.20) and the relevant standards for Chain of Custody (FSC-STD-40-004) and Controlled Wood (FSC-STD-40-005). The validation was implemented against the *Keurhout Protocol for the Validation of Sustainable Forest Management (KH-SFM, version August 31<sup>st</sup>, 2007)*, which is based on the Minimum Requirements for SFM, as established in 1996 by the Dutch Government and which has been further developed since 2004 by the Netherlands Timber Trade Association (NTTA). The validation concerns the Sustainable Forest Management (SFM) of 3 FMU's managed by Rougier Gabon: FMU Haute Abanga (HA; 288,626 ha), FMU Ogooué-Ivindo (OI; 282,030 ha) and FMU Léké (LE; 117,606 ha). The total forest area covered by the certificates amounts to 688,262 ha, the majority of which is classified as evergreen forest of the central zone. Of the total 652,609 ha is production forest; the area does not any forest plantations. The rest (approximately 6 %) is classified as protection forest. This does not include an area of approximately 56,000 ha that was originally part of the OI FMU but given back to the Government for integration in the Ivindo National Park. The chain of custody (CoC) is included from the forest until exportation.

The KH-SFM Protocol consists of four parts. Part I is the Validation procedure, the other parts are normative documents regarding SFM (Part II), CoC (Part III) and Certification Bodies (Part IV). The requirements are structured in the form of Criteria with Indicators grouped under various Principles. All Criteria of the standards contained in Parts II to IV are being assessed. Indicators serve as practical parameters to assess compliance with Criteria. Compliance with all Criteria leads to a positive decision on the validation of the certificate.

Certificates of Rougier Gabon had been admitted to KH-Sustainable since 2003. The latest validation took place in 2006 and concerned the management of HA and OI FMU's and related CoC. The original verification had taken place by DNV against a combination of the ATO/ITTO, ISO -14001 and PEFC-Annex-4 standards. Rougier Gabon decided to apply for FSC certification and changed its Certifying Body (CB) as DNV was not yet accredited by FSC. Periodic contacts were maintained and the BoE was kept informed on developments. In October 2008 the KH Board of Experts (BoE) received a request from KH-participants to validate the newly issued FSC certificates. Between January and March 2009 a validation study took place which included a desk study of relevant documents and several communications with the staff of Rougier Gabon responsible for certification.

Through the desk study a detailed comparison was made between the relevant FSC standards and the requirements of KH-SYS. As well the performance of the FMU's and CoC was assessed. Additional questions were asked concerning aspects that needed more clarity.

## 2) FSC

MTCC is an international certification scheme, which was established in 1992 and the first system to become operational. The basic document for forest management certification is the 2002 forest management standard: "FSC-STD-01-001, version 4.0" Although this document can be applied to forests worldwide, the general approach is that a national standard is developed, together with (local) relevant stakeholders. In the case of Gabon the following national standard has been developed: FSC, 2008. Forest Management Standard RF03 FSC Gabon, version 1.2. Other important documents in this context are the CoC- and controlled wood standards. In addition to these a considerable amount of additional FSC procedures, checklists and other documents is relevant to the development of the FSC certification. FSC is a well developed and well known certification system and counts with the support of many governments and NGOs.

FSC comprises all the issues required for forest certification: requirements for forest management, CoC, and the accreditation and quality of external auditing. FSC accredits independent CB's to certify against its standards, in line with internationally accepted ISO/IEC Guides. FSC is member of ISEAL

#### Management system

Rougier Gabon's management system has been ISO-14001 certified. The management system comprises of a considerable number of well documented policies, flowcharts, programmes and regulations that intend to contribute to the efficient, effective, economically profitable, environmentally responsible and socially acceptable management of the organisation in general and the FMU's and processing plant in particular.

The monitoring and evaluation system ensures feed-back to the management on performance in all fields. The management system includes procedures to ensure that the results of the M&E system are used to further improve the management.

#### Forest management in general

The management plans have been approved by the responsible authorities. All 3 plans mainly focus on timber production. Nevertheless, specific zones have been identified for special management objectives. These include several categories of protection, in line with the terrain conditions and special features present, and cover about 6,5 % of the total area of the FMU's. In such zones no timber harvest takes place; logging roads do not cross such areas and internal delimitation is arranged for. In the main production zone some sub-zones can be identified as well, wherein the main production goal is combined with secondary management objectives. The production zone has been divided in annual cutting areas and a rotation period of 25 years is applied. Within this zone, areas and individual trees can be excluded from exploitation based on terrain conditions and tree characteristics. Calculation of annual allowable cut is based on detailed inventories and computerized projections are made to define the volume to be harvested.

Most management activities are somehow logging related. Before logging takes place inventories are made (focussing on both exploitable trees and future crop trees) and a network of roads and logging tracks is carefully planned and prepared. Log tracks have to be respected. Low impact logging is applied. Procedures are in place for any changes in planned activities. After logging in an area has finished, the roads are closed to avoid trespassing and poaching.

An anti-poaching programme is being implemented in coordination with environmental NGO's (WWF and WCS) and the responsible authorities. Interest in use of NTFP's is increasing, among others as a line of research. Some silvicultural practices have been tried (like cutting lianas), however with limited results. Replanting is practiced in areas where natural regeneration of certain commercial species is restricted.

#### Management of special areas

The cover of conservation areas and protection zones amounts approximately 5 % for both CFAD's. These areas include open swampland, steep riversides, steep mountain and rock areas and ecosystems with special biodiversity values. Logging in such areas is prohibited and management objectives are conservation of soil, water and biodiversity.

#### Management of productive area

The productive area is covered mainly with natural forest; the management objective is timber production. The main commercial timber species is the very abundant Okoumé. Another 35 species are commercially harvested, while other (potential) species are not (yet) harvested. The production forest is partly further subdivided in areas with as additional objectives: officially approved hunting, agroforestry/agricultural production and special attention for biodiversity conservation (e.g. in the buffer zone with the Ivingo National Park).

Management activities in this buffer zone are coordinated with the National Park authorities; it covers 59.000 ha and has a width of 5 km.

The outer boundaries of the CFAD's had been established on maps and in the field between 2000 and 2004. Internal boundaries of annual production areas are prepared before exploitation starts. Boundaries are established using GIS and are maintained.

The access to the FMU's is restricted. Only employees, their families and visitors with a permit are allowed to enter the FMU's. All roads are closed by manned gates which are guarded 24 hrs per day. Registration of all people and vehicles takes place. Mobile controls are implemented as well.

#### Harvest volume

Calculation of the AAC is based on detailed inventories and factors like abundance, regeneration and future crop trees, commercial interest and minimum diameter per species. Computerized projections are made to define volumes to be harvested on a sustainable level. Actual harvest further depends on terrain conditions and stock of exploitable volume.

#### Certification process

The accredited CB conducts a pre audit, which is followed by the main audit or initial audit (IA) and possibly one or more verification audits (VA's). MA's include document review, interviews with staff and stakeholders and field visits to check on compliance with the requirements of the standard. Some VA's may consist of document review only. During the MA and the VA's normally all criteria are checked. After the audits assessment reports are prepared. Identified Major CAR's (Corrective Action Requests) are to be solved within an established timeframe of 6 month, before a certificate may be issued. Minor CAR's are given a closing-out period of 6 month or 1 year, but would not prevent an FMU to be certified. In case a minor CAR can not be closed within the planned timeframe it will normally be up-graded to a Major CAR, and will thus either prevent certification or cause suspension. Finally also recommendations may be given by the CB.

Annual surveillance audits are carried out to monitor compliance with SFM requirements at the FMU level. Such audits use the same standard and approach, but may pay special attention on specific issues, based on possible weaknesses identified in the previous audit. Results of audits are being fed back into the management of FMU's and the long-term FMP and 5 year plans.

In case a FMU is not granted a certificate during the Initial Audit, due to the issuance of one or more Major CAR's, it shall assure that these can be closed during the verification audit. In such audits all criteria will be dealt with and special attention will be given to earlier identified Major and minor CAR issues.

#### Certification process of the 3 HA, OI and LE FMU's

The certification process of the 3 FMU's against the FSC standards was combined, but not conducted under a group certification arrangement. Thus all 3 FMU's received a complete assessment against all P&C of the standard. The audit reports specify to which (combination of ) FMU's the CAR's refer and in what timeframe they need to be closed out.

The IA of the 3 FMU's took place in September 2007 and resulted in the issuance of 1 Major CAR for the CoC and 13 Major CAR's, 23 minor CAR's and 9 Recommendations concerning the forest management.

In June 2008 BVC conducted a 1<sup>st</sup> VA in the field, during which all the Major CARs and 17 minor CAR's were closed-out; 6 minor CAR's (all issued to be addressed within 1 year) were maintained and 22 new minor CAR's and 11 Recommendations were established.

In September 2008 a 2<sup>nd</sup> VA was conducted, based on document review only. During this VA another 10 minor CAR's were closed; 12 minor CAR's (issued during VA-1 and to be

addressed within 1 year) were maintained. In addition 1 new minor CAR and 6 recommendations were established.

As a result the auditors recommended the 3 FMU's and CoC to be issued FSC certificates. The CB's Certification Committee followed this recommendation and issued the certificate for CoC on 09/10/2008 and the certificate for forest management on 15/10/2008.

### **3) Results of the validation**

The certificate has been assessed against the three normative documents of the Keurhout SFM validation process.

The summary of the findings of the Board of Experts is presented below. Under each Principle (P) the assessment of the related Criteria is briefly summarized. This summary is captured in an overall validation per Principle with the following indication:

OK = Satisfactorily addressed

OK - = Minor deficiency

- = Major deficiency

Validation Part II a: Requirements regarding the forest management system.

P 1 OK	The organisation responsible for the management of the forest shall act according to the law.
<p>Three criteria come under this principle. The criteria regard legal entity, registration, the right to harvest and royalties and fees. The Gabon legislative system in combination with the requirement of legal conformity with all relevant laws and regulations covers these criteria sufficiently.</p> <p><i>The FMU's are managed by Rougier Gabon. The CB checked on legal use rights, land claims, legally prescribed fees and tax payment records, awareness on local laws and relevant international agreements and found these to be in order. The CB confirms the availability of relevant registration documents, permits and approved management plans. According to the CB Rougier Gabon is complying with all relevant laws and regulations.</i></p>	
P 2 OK-	The organisation responsible for the management of the forest shall have an adequate forest management system.
<p>Seven criteria come under this principle. Criteria regard a responsible management body, a clear forest management unit, complying with (international) legislation, adequate management plan, and qualified personnel.</p> <p><i>These criteria are considered to be fulfilled satisfactorily. The management body shows its commitment to long term objectives. The CB confirms that the MB is actively involved in the improvement and quality control of the management. Through inventories, studies and consultation with research institutions, GO's, NGO's and communities HCVF's and other classes of conservation units (soil and water, biodiversity, cultural) have been identified.</i></p> <p><b>Minor CAR 1 (HA/OI/LE)</b> issued during IA for the need to document the cases in which legal requirements could not be complied with or are found to conflict with FSC principles, was <b>closed out</b> during VA-2, as the 2 cases of mining companies operating within the FMU's were clearly identified, found to be limited (in total 234 ha) and requests for exclusion according to FSC guidelines had been prepared.</p> <p><b>New minor CAR 59 (LE)</b> was established during V.2 to ensure the exclusion process would be finalised in FMU Léké. Progress will be verified during the <u>next surveillance audit</u>.</p> <p><b>Minor CAR 3 (HA/OI/LE)</b> issued during IA for yet having to develop and put into practice a procedure for the maintenance of boundaries, strengthen the means to limit illegal activities and document the monitoring, was <b>closed out</b> during VA-2. A clear procedure to control and maintain the boundaries was developed. The work had partly been subcontracted and control reports had been made available to the auditors.</p> <p><b>Minor CAR 51 (HA/OI/LE)</b> issued during VA-1 for the need to finalise the social policy document and include the related objectives in the policy statement of the company, was <b>closed out</b> during VA-2, as a new version of Rougier policy had been prepared that pays special attention to social aspects including the revaluation of traditional use and knowledge and the companies contribution to community initiatives and projects.</p> <p><b>Minor CAR 2 (LE)</b> issued during IA for yet having to finalise the FMP and having to present it to the authorities for approval, was <b>closed out</b> during VA-1 as the plan had been prepared and presented to DIARF.</p> <p><b>New minor CAR 50 (HA/OI/LE)</b> was established during V.1 to ensure the up-dated collection of international conventions. Progress will be verified during the <u>next surveillance audit</u>.</p> <p>The last criterion 2.7 "The management body operates a <b>forest management system</b>, according to ISO 9001 or ISO 14001 or based on a comparable systematic approach" is split up in 4 sub-criteria, which consider the planning part, the monitoring of operational aspects, the impact of operations and the feed back of the results into the planning.</p> <p><i>The CB confirms that the FMP's are complete, approved and properly implemented. Summaries of FMP's are also available per FMU. The FMP contains ecological and socio-economic objectives. Planning includes a plan for 25 years, 5 year plans and annual operation plans. Planning and operations have also been certified according to ISO-14001.</i></p> <p><b>Minor CAR 4 (HA/OI/LE)</b> issued during IA for yet having to include annual monitoring of the exploitation of sensitive species in the FMP in order to justify the AAC, was <b>closed out</b> during VA-2, as procedures had been put in place and means made available to monitor the growth of 22 priority species in permanent sample plots.</p>	

**Major CAR 26 (HA/OI/LE)** issued during IA for the need to complete, apply and validate the total set of monitoring procedures in order to develop action programmes to improve, was **closed out** during VA-1, as the CAR procedure had been revised, establishing clear deadlines and assigning responsibilities, monthly quality control visits to the field were instituted and implemented, **Minor CAR 37 (HA/OI/LE)** issued during VA-1 for the need to increase the relation between monitoring and environmental management, was **closed out** during VA-2, as the post description of the responsible forest manager had been adopted to ensure more coordination with the responsible monitoring staff.

**Conclusion:**

Based on the above observations, requirement Part II.a is considered to be sufficiently met. The 2 outstanding minor CAR's will be verified during the next surveillance audit.

**Validation Part IIb: Requirements regarding the forest management performance.**

P 1 OK-	The regulatory functions of the forest shall be preserved.
	<p>Four criteria.</p> <p>Maintenance of soil and water quality, watershed management and erosion prevention are addressed adequately by the SFM criteria.</p> <p><i>The CB confirms that the FMU generally complies with the related criteria.</i></p> <p><b>Minor CAR 9 (HA/OI/LE)</b> issued during IA for the need to up-date the lists of chemicals present at each site, improve the monitoring of their use and provide relevant information to the medical posts, was <b><u>closed out</u></b> during VA-1, as the above had been complied with.</p> <p><b>Minor CAR 10 (HA)</b> issued during IA for the need to rehabilitate and clean-up the Benguié site, was <b><u>closed out</u></b> during VA-1, as operational problems had been solved, polluted soil had been properly stored and water quality checks showed no signs of pollution.</p> <p><b>New minor CAR 47 (HA/OI/LE)</b> was established during V.1 to ensure the definition of rules to periodically up-date the stock of chemical products and improve the usability of the related technical folders at the camp nurseries. Progress will be verified during the <u>next surveillance audit</u>.</p> <p><b>Minor CAR 8 (HA/OI/LE)</b> issued during IA for the need of strict application of procedures on waste management and mapping of dump sites, was <b><u>closed out</u></b> during VA-1, as at all sites waste management had significantly improved on different aspects.</p> <p><b>Major CAR 29 (OI)</b> issued during IA for the need to eliminate the chronic pollution by the pond on the Ivindo river and review the possibilities to review the cleaning modalities of its motor, was <b><u>closed out</u></b> during VA-1, as adequate measures had been taken to eliminate pollution,</p> <p>NB: the CB indicates that logs are treated with FSC approved fumigation chemicals.</p>
P 2 OK-	The biodiversity of the various ecosystems shall be preserved.
	<p>Three criteria.</p> <p>The FSC requirements imply identification of the main ecosystems and tree species. With the planning and implementation of felling and hauling procedures damage to regeneration, flora and fauna is being minimized. Measures for the High Value Conservation Forests (HVCF) are to be established and integrated in the FMP. Effects of these procedures are to be monitored.</p> <p><i>HCVF's cover a total of 31,720 ha (4,6 % of the FMU's). In addition to other conservation areas (holy places: 666 ha and representative areas of different forest type: 10,024 ha) this amounts to 6,55 % of the total area of the FMU's. This does not include an area of almost 7,000 ha that was given back to the Government for inclusion in the Ivindo National Park.</i></p> <p><i>The CB confirms that the management plans are well implemented. It also underlines that part of the activities/procedures are rather new and that correct implementation and effectiveness have to be followed up upon in future.</i></p> <p><b>Major CAR 28 (HA/OI)</b> issued during IA for the need to regulate monitoring of hunting and put into practice a protocol for the monitoring of hunting by forest workers, was <b><u>closed out</u></b> during VA-1. A list was made of all armed forest workers, regulation processes had been conducted, only regulated hunters were allowed to hunt, training was provided for monitoring purposes and monitoring was effected by supervisors. Also sensibilization of hunters from villages had been undertaken and posters had been distributed on protected fauna species.</p>



**New minor CAR 41 (HA/OI/LE)** was established during V.1 to ensure the improved collection and analysis of biodiversity data from the exploitation inventories through training and awareness creation of staff. Progress will be verified during the next surveillance audit.

**New minor CAR 48 (OI/LE)** was established during V.1 to ensure the analysis of monitoring data and the elaboration of an analysis report on hunting by villagers and taking the results into consideration in the context general monitoring of fauna. Progress will be verified during the next surveillance audit.

**New minor CAR 49 (HA/OI)** was established during V.1 to ensure the the finalisation of the administrative regulation process of identified hunters. Progress will be verified during the next surveillance audit.

**Major CAR 27 (HA/OI/LE)** issued during IA for the need to finalise the characterization of HCVF's together with relevant stakeholders and propose relevant management measures, was **closed out** during VA-1, as the different types of HCVF were defined, identified and mapped for each FMU.

**Minor CAR 43 (HA/OI/LE)** issued during VA-1 for the need to systematically document internal monitoring of hunting, was **closed out** during VA-2, as a procedure for internal monitoring, including a detailed list of 12 potential infringements (e.g. entry without permission, transport of bush meat, overloading) and monitoring formats had been put into effect. The monitoring results of August and September (10 checks/month /FMU) indicated that only in 12 % offences were observed, none of which was related to wildlife.

**Minor CAR 45 (HA/OI/LE)** issued during VA-1 for the need to include control on hunting in the ToR of the responsible staff members, was **closed out** during VA-2, as the respective ToR's had been adjusted accordingly.

**New minor CAR 40 (HA/OI/LE)** was established during V.1 to ensure the finalisation of the validation process of the characterisation of HCVF's. Progress will be verified during the next surveillance audit.

P 3 OK-	Adverse side effects, resulting from forest management, shall be prevented.
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One criterion.

The criterion requires social and environmental impact assessments. Such assessments are required by FSC, and their results shall be included in management planning. Social Impact monitoring is rather new in Malaysia.

*In general the CB considered these elements to be complied with properly.*

**Major CAR 31 (OI/LE)** issued during IA for the need to finalise the social impact assessments at OI and LE and inform the local communities on the impacts and actions to be taken to compensate and/or optimise these, was **closed out** during VA-1, as the SIA's had been completed and an awareness campaign was being implemented by the sociologists of the company.

**Minor CAR 6 (HA/OI/LE)** issued during IA for yet having to systematize EIA's for every new activity in order to create a basis for operational analysis, was **closed out** during VA-2, as a procedure was developed to systematically analyse environmental impact of certain activities through the use of specific field checklists.

**New minor CAR 39 (HA/OI/LE)** was established during V.1 to ensure the inclusion of recommendations of RIL training into the management procedures and ensure their implementation. Progress will be verified during the next surveillance audit.

P 4 OK	The timber production capacity of the forest shall be preserved.
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Four criteria.

Criteria regarding the maintenance of management data, preservation of natural regeneration capacity and implementation of appropriate harvesting systems are well covered. Also minimizing harvesting damage to the residual stand, seedlings and soil is required.

*In general the CB considered these elements to be complied with properly.*

The CB confirm that sustainable forest management techniques are applied (including RIL, harvest of 1-3 trees/ha, rotation of 25 years, respecting of minimum diameters, protection of "future trees", calculation of harvest volume per species and per site, harvest is less than accrued growth) and that approximately 6.5 % of the FMU's has been excluded from logging (different types of HVCF's). In addition in certain areas (e.g. the 59,000 ha buffer zone to Ivindo National Park) special management arrangements shall avoid negative impact on the wildlife.

100 % inventories are implemented on 1 % of the FMU's. Permanent sample plots are installed; in addition studies and partnerships with NGO's and scientific organisations provide many data of use for management. Net harvest ranges between 10 and 45 m3/ha/yr. In total approximately 300,000 m3 are harvested annually in a total area of 688,262 ha.

<p><b>Major CAR 25 (HA/OI/LE)</b> issued during IA for the need to improve and put into practice RIL techniques, was <b><u>closed out</u></b> during VA-1, as significant improvement was observed, especially with regards to felling techniques. Training had been conducted on road construction, establishment of log yards and controlled felling and had effectively contributed to improvements.</p> <p><b>Minor CAR 38 (HA/OI/LE)</b> issued during VA-1 for the need to develop an environmental analysis procedure on old exploitation infrastructure before re-use, was <b><u>closed out</u></b> during VA-2, as such procedure had been taken care of under the closing out of CAR 6,</p>	
P 5 OK	<p>The production capacity of non-timber forest products (NTFPs) shall be preserved.</p> <p>Three criteria. Criteria refer to the maintenance of data on NTFP's, local processing of NTFP's and support to the development of the local economy.</p> <p><i>The CB indicates that there is no commercial utilization of NTFP's in the area. NTFP's are only used for own consumption.</i></p> <p><i>Rougier Gabon employs well over 1,300 people. Most are from the region. The company also subcontracts several companies for specific jobs (e.g. maintenance, provision of food, etc) and implements local agricultural projects to stimulate local food production.</i></p>
P 6 OK-	<p>The participation of the local population shall be ensured.</p> <p>Three criteria Criteria refer to the consultation of stakeholders, opportunities for profit sharing and the respect for rights of various stakeholders.</p> <p><i>The CB confirms that the company has applied participatory approaches with respect to HCVF's identification, mapping of areas of cultural importance and definition of management approaches for sensitive areas and species, among others.</i></p> <p><b>Minor CAR 5 (HA/OI/LE)</b> issued during IA for not including information on HCVF's and monitoring data in the public summary of the FMP, was <b><u>closed out</u></b> during VA-1, as such information had been prepared and made available</p> <p><b>New minor CAR 46 (HA/OI/LE)</b> was established during V.1 to ensure the more precise development of the internal and external communication strategies, including issues to comment on, communication tools, frequency, etc. Progress will be verified during the <u>next surveillance audit</u>.</p> <p><b>Minor CAR 7 (HA/OI/LE)</b> issued during IA for yet having to put into practice partnerships to study protection zones through specific inventories directed at RTE species, was <b><u>closed out</u></b> during VA-2, as an analysis protocol had been established and used, the first field missions on flora had taken place, and more had been scheduled (among others to HCVF's and on fauna). Further progress will be verified by the CB during the next surveillance audit.</p> <p><b>Minor CAR 11 (OI/LE)</b> issued during IA for the need to formalise mechanisms for dispute resolution and register the resolution of conflicts, was <b><u>closed out</u></b> during VA-1. Two procedures had been put in place and all conflict management processes were systematically documented.</p> <p><b>New minor CAR 52 (OI/LE)</b> was established during V.1 to ensure the formalisation of participatory monitoring of the implementation of agreements with communities. Progress will be verified during the <u>next surveillance audit</u>.</p>
P 7 OK-	<p>The social and economic well being of the local population and employees shall be ensured.</p> <p>Four criteria. The criteria concern job opportunities for local population, working conditions, training, health and safety provisions and knowledge and respect of legislative instruments and regulations. All these requirements are adequately addressed by the FSC requirements.</p> <p><i>The CB provides an extensive list of laws and regulations applicable to various aspects of the management of the company. In general the CB confirmed compliance with the requirements. A considerable number of CAR's was issued and closed out. Some new minor CAR's are still pending.</i></p> <p><b>Minor CAR 12 (LE)</b> issued during IA for the need to develop an action plan and budget on food security, was <b><u>closed out</u></b> during VA-1, a food security programme had been developed and subsidised by the company, and several field projects had effectively started.</p>

**Minor CAR 13 (HA/OI/LE)** issued during IA for the need to develop and put into practice a socio-political company strategy towards river communities, was **closed out** during VA-1, as such a strategy had been developed and effected, focussing on support to local projects on agricultural development, health and education.

**Minor CAR 42 (HA)** issued during VA-1 for the need to develop a reassurance and valorisation project in the Benguié area, including landscape, environmental and rural development aspects, was **closed out** during VA-2, as such a programme had been designed, a time schedule had been put into effect, meetings had been held to identify agro-pastoral activities, implementation progress had been shown on photo's and a procedures had been established for environmental monitoring (especially on water quality).

**New minor CAR 53 (OI/LE)** was established during V.1 to ensure that communities are informed about the modalities of employment and the results of recruitment sessions. Progress will be verified during the next surveillance audit.

**Major CAR 32 (OI/LE)** issued during IA for the need to make an overview of professional classifications in line with current conventions and apply the classification in case of change of posts, was **closed out** during VA-1, as a global overview had been made at company level and up-dates were being systematized throughout the company.

**New minor CAR 55 (HA/OI/LE)** was established during V.1 to ensure the systematic documentation of periodic overviews on professional classification of workers. Progress will be verified during the next surveillance audit.

**Minor CAR 16 (HA/OI/LE)** issued during IA for yet having to develop and put into practice a monitoring procedure for periodical medical visits of forest workers, was **closed out** during VA-1, as the strengthening of human resources has allowed for improved monitoring of workers. The medical visits had been systematized.

**Minor CAR 17 (HA/OI/LE)** issued during IA for the need to harmonise and centralise the analysis of work accidents, was **closed out** during VA-1, as a new procedure had been installed and analysis had been produced per site and per accident type.

**Minor CAR 19 (HA/OI)** issued during IA for the need to define a procedure for the testing of drinking water quality, was **closed out** during VA-1, as a company had been contracted to do two-monthly tests at all relevant field sites. Reports were submitted to the auditors.

**Minor CAR 21 (HA)** issued during IA for need to improve the housing and toilet facilities of gate staff at Biboulou, was **closed out** during VA-2, as 5 new houses were constructed for the guards, in line with other staff housing and provided with toilets and sun energy..

**Major CAR 24 (HA)** issued during IA for the need to bring the Ndjolé site up to standard with respect to environmental, social and security issues, was **closed out** during VA-1, as numerous improvements had been realised on living conditions and workshops, including proper security arrangements, organisation and waste management.

**Major CAR 36 (HA/OI)** issued during IA for the need to assure an effective cool chain for frozen food products, was **closed out** during VA-1, as a contract for field delivery had been signed with a supplier of frozen products and new cooling containers had been purchased. A significant difference in the availability of frozen products and maintenance of freezers was observed.

**Minor CAR 44 (HA/OI)** issued during VA-1 for the need to organise monitoring of the effectiveness of the sinks installed for the drainage of showers, was **closed out** during VA-2, as the relevant procedure and maintenance control formats had been developed and arrangements had been made for the monthly control by camp managers.

**Minor CAR 56 (HA/OI)** issued during VA-1 for the need to organise monitoring of the effectiveness of the installed cool chain and adequate use of the new equipment, was **closed out** during VA-2, as the new equipment had been received, a monitoring procedure had been detailed and put into effect, and a contract had been signed for the maintenance of the equipment.

P 8 OK-	Socio-cultural forest functions and utilisation by indigenous and other people living in and around the forest shall be respected.
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Four criteria.

Criteria refer to respecting of traditional land-use rights, knowledge and respect for traditional NTFP-use and for areas of religious or cultural importance and maintenance of aesthetic value.

Except for aesthetic value, all these elements are sufficiently addressed by the FSC requirements.

*The criterion on aesthetic value is not considered opportune in the context of Gabon.*

*NTFP's are not commercially harvested, but only for subsistence use. Related customary rights are generally respected. Hunting is allowed only by registered hunters, in specific areas and on selected animal species.*

**New minor CAR 54 (OI)** was established during V.1 to ensure the solution of on-going conflicts with the communities of Ayol and Alar and finalise the participatory delimitation of the boundaries of communal use areas in Ovan. Progress will be verified during the next surveillance audit.

**Major CAR 30 (OI)** issued during IA for the need to establish and validate the mapping of sites of cultural and economical importance in coordination with the local river communities, was **closed out** during VA-1, as the the maps had been realised, discussed and validated with the communities through a participatory process.

P 9 OK	Negative social impacts caused by forest exploitation shall be reduced.
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Two criteria.

The criteria concern compensation for damaged property and related laws and mechanisms.

*The FSC standard adequately covers these criteria. As the CB did not issue any negative CAR's or recommendations, it is supposed that appropriate mechanisms are available and known.*

Conclusion:

Based on the above observations, requirement Part II.b is considered to be sufficiently met. The 11 outstanding minor CAR's will be verified during the next surveillance audit.

### Validation Part III: Requirements regarding the chain of custody

P 1 OK	The timber shall be traced and monitored from the moment of felling through all its possible stages of processing and transport up to the moment of being imported in the EU.
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Five criteria.

The main issues is: parties in the CoC have a certified management system according to ISO norms. Criteria refer to valid registration and licences, internal management systems, availability of well documented procedures in the forest and through processing, establishment of certified %'s and mixing with timber from legal origin sources. This implies the registration and documentation of production, processing, storage, transport and sales and the distinguishing between certified and non-certified timber products. In case of mixed products the certified products should at least be mixed with timber(products) from legal origin.

*The CoC-part of the forest management is covered by the forest management (SFM) certificate, The requirements on sawing, processing and export of timber and logs are covered by the CoC standard. The SFM standard requires compliance with all relevant laws and regulations. It also requires forest managers to enable monitoring and certification organizations to trace each forest product from its origin. The CoC standard covers all issues and critical control points of the CoC.*

*Rougier Gabon, which is registered according to national legislation and in possession of the necessary licences and permits. The only client is Rougier International. Both companies have a valid FSC CoC certificate and a valid certificate for ISO-14001.*

*Processed timber can be traced back to logs. Only logs from the FMU's of Rougier are allowed to enter the CoC. All parts of the CoC are managed by the company (no subcontracting). The CB confirms that the company complies with all points of the FSC CoC standard.*

*Only logs from the FMU's of Rougier are allowed to enter the CoC. Next to logs from HA, OI and LE this can also include logs from the FMU Moyabi which at the moment does not fall under the FSC certification. Therefore **Major CAR 01** was issued during the IA, in order to exclude the logs from Moyabi FMU from the certified CoC through the application of a FSC credit system. The output is then a certain volume that is 100 % FSC certified. The CB confirms that the system is applied correctly and therefore has **closed out** the CAR and issued a CoC certificate.*

***Minor CAR 23**, issued during IA for the need to respect the frequency of checks on log suppliers, was **closed out** during VA-1, as the log suppliers were field checked every 6 month and adequate administration of related correspondence and documents was observed.*

Conclusion:

Based on the above observations, requirement Part III is considered to be fully met.

Validation Part IV: Requirements regarding the certifying body

P 1 OK	The certification body shall be able to demonstrate that it is capable of assessing forest management and the management system and/or the Chain of Custody.
<p>Seven criteria.</p> <p>The first three criteria concern the expertise and independence of the CB. These criteria are implicitly met as MTCC requires CB's to be adequately accredited by the national accreditation body DSM.</p> <p>The following four criteria refer to the assessment scheme. They address audit procedures including the identification of relevant legislation and existing (customary) rights and requirements for the audit report. All these requirements are covered through the accreditation by a national accreditation body.</p> <p><i>BVC is accredited by COFRAC for verification of ISO 9000, ISO 14001, PEFC Forest management and PEFC CoC. BVC is also accredited by FSC for Forest management and CoC verification.</i></p>	

Conclusion:

Based on the above observations, requirement Part IV is considered to be fully met.

Summary of Principles with deficiencies

Part	OK	OK -	--
II a	P 1	P 2	
II b	P 4; 5; 9	P 1; 2; 3; 6; 7; 8	
III	P 1		
IV	P 1		

**Overall conclusion:**

In general it is observed that all three normative parts of the Keurhout Protocol are being sufficiently covered by the requirements of the FSC system. In practice the CB has identified several issues that needed to be strengthened, for which CAR's were established. Many of those have been closed; several minor CAR's remain open and will be verified by the CB during the next surveillance audit.

The BoE **accepts** the FSC certificates for **Rougier Gabon** as described in the studied documents without further conditions, to the Keurhout Sustainable system, but will critically follow developments on the closing out of the established minor CAR's.

*And further:*

*Keurhout considers it the responsibility of Rougier Gabon to provide Keurhout with full copies of annual surveillance audit reports, related to the FMU's.*

*Rougier Gabon shall inform Keurhout in advance on any changes of its standards as well as of changes in relevant legislation and/or regulations.*

*Rougier Gabon shall inform Keurhout immediately in case of suspension or termination of the certificate.*

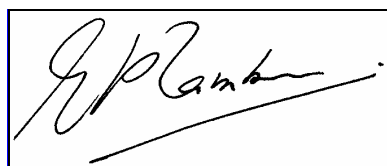
*Failure to do so may result in suspension or termination of the admission to the Keurhout Sustainable system.*

Date: April 16<sup>th</sup>, 2009

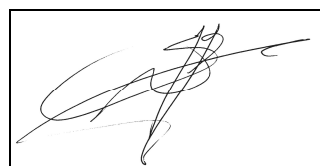
Signed:

Ir. E.P. Zambon

Prof. C.J. Jepma



(Secretary)



(Chairman)