



**Forest Management and Stump-to-Forest Gate Chain of Custody
Compliance Certification Evaluation Report for the:**

**Wuhua Eucalyptus Forest
Under the
Management of
Wuhua County Senhui Forest Development CO., LTD
Conducted under the auspices of the SCS Forest Conservation Program
SCS is a Forest Stewardship Council Accredited Certification Body**

**CERTIFICATE NUMBER
SCS-FM/COC-00122P**

**Lead Author: Dr. S.K.Yap
Date of Field Audit: Dec 7-11, 2009
Date of Report: February 11, 2010**

Submitted to:

**WUHUA COUNTY
SENHUI FOREST DEVELOPMENT CO., LTD**

**SCIENTIFIC CERTIFICATION SYSTEMS
2000 Powell St. Suite Number 1350
Emeryville, CA 94608, USA
www.scs-certified.com**

**SCS Contact: Dave Wager dwager@scs-certified.com
Contact: Wuhua County Senhui Forest Development Co. Ltd.**

Organization of the Report

This report of the results of our compliance evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the full evaluation process, the management programs and policies applied to the forest, and the results of the full evaluation. Section A will be posted on the SCS website (www.scscertified.com). Section B contains more detailed results and information for the use of Wuhua County Senhui Forest Development Co. Ltd.

Forest Management and Stump-to-Gate Chain-of Custody Certification Evaluation Report for Wuhua County Senhui Forest Development CO., Ltd. Forest Management Unit

FOREWORD

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by Wuhua County Senhui Forest Development Co., Ltd. to conduct a compliance certification evaluation of its Eucalyptus plantation. Under the FSC/SCS certification system, forest management operations meeting international standards of forest stewardship can be certified as “well managed”, thereby enabling use of the FSC endorsement and logo in the marketplace.

In 7-11 December 2009, an interdisciplinary team of forestry, natural resource and social specialists was empanelled by SCS to conduct the evaluation. The team collected and analyzed written materials, conducted interviews and completed a 3-day field and office audit of the subject property as part of the certification evaluation. Upon completion of the fact-finding phase of the evaluation, the team assessed conformance to the 56 FSC Criteria in order to determine whether award of certification was warranted. As there was a major non-compliance resulting in a Major Corrective Action Request (CAR) being raised, documentation verification was required to reassess the corrective actions taken to close this Major CAR.

As detailed below, a pre-condition (also known as Major Corrective Action Request) that was stipulated by the audit team upon completion of the field audit was to be addressed by Wuhua County Senhui Forest Development Co., Ltd. and cleared by SCS prior to finalization of this report. In the event that a certificate is awarded, Scientific Certification Systems will post this public summary of the report on its web site (www.scscertified.com).

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SECTION A- PUBLIC SUMMARY AND BACKGROUND INFORMATION

1.0 GENERAL INFORMATION

1.1 FSC Data Request

Applicant entity/ Forest Management Enterprise (FME)	Wuhua County Senhui Forest Development Co., Ltd
Contact person	Mr. Li Ningjin
Address	No. 131 Xinxing Street, Anliu Town, Wuhua County Guangdong Province, China
Telephone	+86 753 4422802
Fax	+86 753 4521066
E-mail	Senhuiwuhua2008@126.com
Certificate Type	Single FMU
SLIMF <i>if applicable</i>	Not applicable
Group Members <i>if applicable</i>	Not applicable
Number of FMU's <i>if applicable</i>	One
Number of FMUs in scope that are	
less than 100 ha in area	Nil
100 - 1000 ha in area	Nil
1000 - 10 000 ha in area	One FMU consisting of 25 units of 10 to 500 ha each
more than 10 000 ha in area	Nil
Location of certified forest area	
Latitude	23° 45' to 23° 52'
Longitude	115° 35' to 115° 42'
Forest zone	Plantation
Total forest area in scope of certificate which is included in FMUs that:	
are less than 100 ha in area	Nil
are between 100 ha and 1000 ha in area	Nil
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	Nil
Total forest area in scope of certificate which is:	
privately managed ¹	3338 ha
state managed	Nil
community managed ²	Nil
Number of forest workers (including contractors) working in forest within scope of certificate	10 permanent staff and 200 contract workers
Area of forest protected from commercial harvesting of timber and managed primarily for conservation objectives	667.6 ha
Area of forest protected from commercial	Nil

¹ The category of 'private management' includes state owned forests that are leased to private companies for management, e.g. through a concession system.

² A community managed forest management unit is one in which the management and use of the forest and tree resources is controlled by local communities.

harvesting of timber and managed primarily for the production of NTFPs or services	
Area of forest classified as 'high conservation value forest'	Preliminary survey indicated the absence of HCVF attributes
List of high conservation values present ³	None determined
Total area of production forest (i.e. forest from which timber may be harvested)	3,338 ha tree cover
Area of production forest classified as 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF)	3,338 ha
Area of production forest regenerated primarily by replanting ⁴	It was projected that regeneration of the Eucalyptus trees for the second rotation following harvesting would depend on the regenerated shoots from the cut stumps.
Area of production forest regenerated primarily by natural regeneration	3,338 ha
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	<i>Eucalyptus</i> hybrids of U6, DH 32-29 and DH 201-2.
Approximate annual allowable cut (AAC) of commercial timber	The first harvesting would start in 2010, and the annual allowable cut had been determined at about 41308t.
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	At present the whole plantation consisted of only Eucalyptus trees. There were plans for non-timber forest products with the establishment of <i>oil</i> producing plants and <i>Camellia</i> tea in future.
List of product categories included in scope of joint FM/COC certificate and therefore available for sale as FSC-certified products (include basic description of product - e.g. round wood, pulp wood, sawn timber, kiln-dried sawn timber, chips, resin, non-timber forest products, etc.)	Timber from Eucalyptus hybrids of U6, DH32-29, DH201-2.

1.2 Management Context

Wuhua County Senhui Forest Development Co., Ltd had been approved by the government in 2004 to contract from the local commutes to harvest and reforest an area of 3,338 ha in 3 main geographical regions within the Wuhua County near the Meizhou City in the Province of Guangdong. The species planted is Eucalyptus hybrids which will be the main timber source in 6 years. Other species found within the FMU are some broadleaf tree species like *Schima superba*, *Chinese-fir*, *Castanopsis fissa*, *Acacia confusa*, and *Camellia sp.* Harvesting of Eucalyptus would be conducted in 2010. A

³ High conservation values should be classified following the numbering system given in the ProForest High Conservation Value Forest Toolkit (2003) available at www.ProForest.net

⁴ The area is the *total* area being regenerated primarily by planting, *not* the area which is replanted annually. NB this area may be different to the area defined as a 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF) or for other purposes.

Forest Management Plan (SH-FSC/FM-P7-1) 2008 to 2013 had been written for the management of the Eucalyptus forest and the coniferous tree species which will be managed for optimum growth and production.

Management is divided into 3 forest management regions, 20 villages and 25 harvesting sites for silvicultural works and harvesting purposes. A management programme for the 3 forest management regions is presented in the management plan. The plan also includes a programme for artificial regeneration of selected sites with forest broadleaf tree species.

Harvesting of Eucalyptus had been scheduled at the age 5 to 6 in accordance to the demand from the manufacturing sector. Projected production of the Eucalyptus had been listed in their harvesting plan (SH-FSC/FM-P6-3) for the next 7 years.

The principal regulations of relevance to forest managers in the FMU are associated with the following statutes:

Pertinent Regulations at the National and Provincial Level:

- Forest Laws of the People's Republic of China (1984, revised in 1998)
- Sandification Prevention and Control Law of the People's Republic of China (2001)
- Water Law of the People's Republic of China (1998)
- Soil and Water Conservation Law of the People's Republic of China (1991)
- Law on Water Pollution Prevention and Control of the People's Republic of China (1984, revised in 1996)
- Land Management Law of the People's Republic of China (1999)
- Wildlife Conservation Law of the People's Republic of China (1988)
- Seed Law of the People's Republic of China (2000)
- Labor Law of People's Republic of China (1994)
- Worker's Union Law of the People's Republic of China (1992, revised in 2001)
- Property Right Law of the People's Republic of China (2007)
- Rural Land Contracting Law of the People's Republic of China (2003)
- Safe Production Law of the People's Republic of China (2002)
- Environment Impact Assessment Law of the People's Republic of China (2002)
- Environment and Natural Resources Protection Law of the People's Republic of China (2001)
- Animal Epidemic Prevention Law of the People's Republic of China (1997)
- Flood Control Law of the People's Republic of China (1997)
- Law on Imported and Exported Fauna and Flora Quarantine of the People's Republic of China (1991)
- Law on Hunting Gun and Bullet Management of the People's Republic of China (1993)
- Law on Promoting the Transfer of Science and Technological Achievements of the People's Republic of China (1996)

Regulations

- Regulations for the Implementation of the Forest Law of the People's Republic of China (1986, revised in 2000)
- Regulations on Nature Reserves of the People's Republic of China (1994)
- Regulations for the Implementation of Terrestrial Wildlife Conservation (1992)
- Regulations on Wild Flora Conservation of the People's Republic of China (1997)
- Regulations on Protecting New Plant Varieties of the People's Republic of China (1997)
- Regulations for the Implementation of the Soil and Water Conservation Law of the People's Republic of China (1993)
- Regulations on Converting Cropland to Forests of the People's Republic of China (2003)
- Regulations for the Implementation of the Land Management Law of the People's Republic of China (1999)
- Regulations on Forest Disease and Pest Control of the People's Republic of China (1989)
- Regulations on Forest Fire Prevention of the People's Republic of China (1988)
- Regulations on Seed Management of the People's Republic of China (1989)
- Regulations for the Implementation of the Law on the Imported and Exported Wild Fauna and Flora of the People's Republic of China (1996)
- Regulations on Flood Control of People's Republic of China (1998)

Administrative Regulations and Rules

- Measures for the Registration of Timber and Forest Land Tenure (2001)
- Measures for the Verification and Approval of the Occupation and Confiscation of Forest Land (2001)
- Measures for Dispute Settlement on Timber and Forest Land Tenure (1996)
- Measures for Nature Reserves of Forest and Wildlife Category (1985)
- Measures for the Natural Forest Protection Program (2006)
- Measures for Forest Harvest and Regeneration (1987)
- Measures for Forest Resources Files (1986)
- Interim Measures for Afforestation Quality Control (2003)
- Interim Regulations on Developing Annual Forest Harvest Quota (1985)
- Measures for Seed Quality (2007)
- Measures for Prompting the Use of Good Forest Breeds (1997)
- Measures for the Package and Label of Forest Seeds (2002)
- Measures for the Production and Management License of Forest Seeds (2002)
- Regulations on the Annual Verification System of Production and Management License of Forest Seeds (2003)
- Measures for the Quality Supervision of Tree Seedling of the State Forestry Administration of China (2002)
- Measures for Quarantine Approval of Introducing Exotic Species (1980)
- Measures for the Implementation of the Management and Supervision of the State-owned Forest Resources and Assets (Try out) (1996)

- Measures for the Implementation of the Regulations on Protecting New Plant Varieties of the People's Republic of China (1999)
- Regulations on the Quarantine, Approval and Supervision of Introducing Tree Seeds and Seedlings and other Propagating Materials (2003)

Note: All above-mentioned regulations or rules were released by State Forestry Administration or former Forestry Ministry.

Technical Codes and Guidelines

- List of Species and Countries Prohibited Trading Released by CITES Secretariat (2001)
- List of Wild Flora under Priority State Protection (First Group) (1999) (State Forestry Administration and Ministry of Agriculture)
- GB/T 18337.3-2001 Technical Codes for the Establishment of Public Benefits Forest (2001)
- Outlines for Developing and Implementing Forest Management Plan (2006) (State Forestry Administration)
- Guidelines for Sustainable Forest Management in China (2006) (State Forestry Administration)
- LY/T1646-2005 Codes for Forest Harvest Operations (2005)
- LY/T 1607-2003 Codes for the Design of Afforestation Operations (2003)
- LY/T 1706-2007 Technical Codes for Breeding Fast-growing and High-yielding Timber Forest (2007)
- GB/T 1690-2004 Technical Codes for Mountain (Sand) Closure (2004)
- LY/T 1690-2007 Technical Codes for the Improvement of Low-yielding Forest (2007)
- LY/T 1692-2007 Technical Codes for the Importance Evaluation of Genetically-modified Forest Plants and their Products (2007)

1.2.1 Environmental Context

The FMU is located within the Wuhua County, distributed in 3 regions and 20 villages of the county. It has a topographical variation from 200m to 600m. The original vegetation consisted mainly of subtropical broad leaf flora species but owing to fire and historical land clearance the area was completely cleared of the original flora. Attempts had been made by the County Forestry Bureau and local communities to reforest the area with *Pinus* trees. This was not successful until the FME leased these lands and started a program to plant Eucalyptus trees. There were small residual amount of broadleaf and coniferous tree species like *Schima superba*, Chinese-fir (*Cunninghamia lanceolata*), *Castanopsis fissa*, *Acacia confusa* and *Camellia* sp.

The FMU area consisted of 3,338 ha mostly planted with Eucalyptus and as specified under the lease with the County Forestry Bureau, 667.6 ha forest would be maintained for local tree species.

The FME had conducted an Environmental Impact Assessment (SH-FSC/FM-P6-1) for the plantation to assess the biological resources, potential impacts of its activities and social composition of the county. It had also elaborated on the mitigation measures required. The report indicated that the existing air and water qualities within the county to be good and were within the national acceptable levels.

The use of chemical pesticides would only be confined to pest and disease control. The Eucalyptus forest had reached closed canopy thus reducing the problem of weeds. All forms of hunting and poaching are prohibited within the forest on lease to the company.

A network of roads had been constructed and maintained by the company for the establishment of the trees.

1.2.2 Socioeconomic Context

The local communities have leased their land to the company for planting, management and production of mainly *Eucalyptus* timber. The length of the leases varies from 15 to 40 years and is monitored by the Wuhua County Forestry Bureau. Prior to the joint agreements, the landowners, who were mainly farmers, were dependent solely on agricultural crops as they had no resources to initiate large scale tree planting. The leasing arrangement has allowed them to get additional incomes for their land. They are still permitted to conduct their traditional farming practices outside the leased area as well as supplementing their incomes by being contractors to the company during planting and maintenance of the trees. During the meeting with representatives of the communities they had expressed satisfaction with the present arrangement and had no specific grievances with the operation of the company.

1.3 Forest Management Enterprise

1.3.1 Land Use

The Eucalyptus forest sites leased by the company are distributed in 3 geographical regions of the county. These are managed by 3 teams with 25 harvesting units in 20 villages. The biggest region is in Anliu Town with 10 villages, covering an area of 29,412.4 mu (1,960.8ha). The second region is Hengpi Town covering an area of 15,340.5 mu (1,022.7ha) with 8 harvesting units in 8 villages. The smallest is Zhoujiang Town with 2 villages, and only 5,317.6 mu (354.5 ha). The distribution of the various units and area is shown in Table 1.

TABLE 1
Distribution of the harvesting units within the FMU

Geographical unit	Village	Area of each harvesting unit (mu) 1 ha = 15 mu	Density(poles/mu)	Age (year)	Species	Tenure of use (year)
Anliu	Wantang	5191.9	90	4	Eucalyptus-U6	40
Anliu	Zhangtan	1687.9	90	4	Eucalyptus-U6	40
Anliu	Zhangtan	300	90	4	Eucalyptus-DH3229	40
Anliu	Zhangtan	1070.8	67	3	Eucalyptus-U6	40
Anliu	Fuxi	2298.5	90	4	Eucalyptus-U6	40
Anliu	Fuhua	276	13	5	Eucalyptus-U6	15
Anliu	Fuhua	151.5	90	4	Eucalyptus-U6	40
Anliu	Fulong	186	133	5	Eucalyptus-U6	15
Anliu	Wenkui	4663.2	67	3	Eucalyptus-U6	40
Anliu	Longlou	7629.3	67	3	Eucalyptus-U6	40
Anliu	Kuizhang	960.9	67	3	Eucalyptus-U6	40
Anliu	Kuizhang	150	67	3	Eucalyptus-DH2012	40
Anliu	Fuling	3739.9	67	3	Eucalyptus-U6	30
Anliu	Wulian	306.5	67	3	Eucalyptus-U6	30
Anliu	Wulian	800	67	2	Eucalyptus-DH3229	40
Zhoujiang	Lanbu	1538.2	90	4	Eucalyptus-U6	40
Zhoujiang	Huanghua	3779.4	67	3	Eucalyptus-U6	40
Hengpi	Zhanglian	1398.4	67	2	Eucalyptus-DH3229	40
Hengpi	Chongwen	271.5	67	2	Eucalyptus-DH3229	40
Hengpi	Hengpi	1320.1	67	2	Eucalyptus-DH3229	40
Hengpi	Tianbu	454.6	67	2	Eucalyptus-DH3229	40
Hengpi	Jiangnan	1654.8	67	2	Eucalyptus-DH3229	40
Hengpi	Laolou	2225.3	67	2	Eucalyptus-DH3229	40
Hengpi	Luopi	6332.1	67	2	Eucalyptus-DH3229	40
Hengpi	Hutang	1683.7	67	2	Eucalyptus-DH3229	40
Whole FMU	Grand total	50070.5				

1.3.2 Land Outside Scope of Certification

All the lands leased by the FME are placed under one management and under the present forest certification preview. Owing to the barren nature of the area, except for some scattered residual trees, prior to plantation establishment there are no remaining natural forested sites within the FMU. The management had worked with the County Forestry Bureau on protected ecosystems outside the FMU to compensate for this gap. The FME does not own other forest areas outside of the one seeking certification. The surrounding non planted areas were used by the local communities in farming and rice cultivation.

1.4 Management Plan

1.4.1 Management Objectives

The main objectives listed in the forest management plan are to:

- Increase productivity of the planted forest through efficient management techniques
- Ensure healthy ecological balance within the plantation
- Ensure the protection of ecological functions especially water and soil
- Ensure sustainable forest management
- Improve the economic status of the population in Wuhua County

1.4.2 Forest Composition

This FMU is dominated by the planted Eucalyptus species consisting of hybrids *U6*, *DH32-29* and *DH201-2*. Small patches of the forest have residual coniferous and broadleaf tree species. Examples are *Schima superba*, Chinese-fir (*Cunninghamia lanceolata*), *Castanopsis fissa*, *Acacia confusa* and *Camellia sp.*

1.4.3 Silvicultural Systems

The forest area is presently managed to optimize production of the Eucalyptus varieties of *U6*, *DH32-29*, *DH201-2*. Eventually as indicated in the Forest Management Plan harvesting

also be carried out on the small amount of Chinese-fir, *Schima superba*, *Castanopsis fissa*, *Acacia confusa* and *Camellia sp.* that had regenerated within the forest. The planned initial approach is to harvest the Eucalyptus trees and produce the next rotation from vegetative regeneration from the stumps. Planting using seedlings will also be initiated to reduce the effect of poor growth.

1.4.4 Management Systems

The *Forest Management Plan 2008 to 2013 (SH-FSC/FM-P7-1)* projected that the Eucalyptus trees would be harvested at the age of 5 to 6 years. The area for each annual harvest would be approved by the County Forestry Bureau. It was estimated that 5 million poles of Eucalyptus could be produced from the plantation with a total volume of 250,000 m³. The annual harvest would be 500,000 trees. In addition to the planted Eucalyptus there would also be residual trees of the broad leaf species that would be harvested eventually.

The forest plantation had been established from 2004 to 2007 thus harvesting would be based on blocks of different ages. Except at the management level planting, maintenance and harvesting were all implemented by contractors with labour from the communities.

1.4.5 Monitoring System

The monitoring system is developed in line with the National Forestry Act with an integrated and preventive approach. Growth and yield data of each species is monitored within the area. Yield of forest products and environmental changes as well as production cost were also maintained. Occurrences of pests and diseases and the efficiency of preventive measures are documented. Prevention of fire problems would also be included as specified in the management plan. Documentation of production from each site will also be included in the monitoring.

1.4.6 Estimate of Maximum Sustainable Yield

The estimated mean annual increment of the Eucalyptus trees is projected to be 0.05m³ *per* tree. With the present planting spacing there would be 1,500 trees per hectare resulting in 5 million trees. It was estimated that 34% of these trees would be reaching maturity producing a maximum 1.7 million poles. The area to be harvested would be based on the age of the trees and had to be approved by the Forestry Bureau.

1.4.7 Estimated, Current and Projected Production

Based on their forest monitoring procedure, the Eucalyptus annual production is about 0.05 m³ per tree. The harvesting plan projected a harvest of about 43,108t in 2010.

2.0 GUIDELINES/STANDARDS EMPLOYED

The SCS Interim Standard for Forest Management Certification in China V 1.0(February 23, 2009) was adopted for this full evaluation audit.

3.0 THE FULL EVALUATION ASSESSMENT PROCESS

3.1 Assessment Dates

Certification Audit: 7-11 December 2009

3.2 Assessment Team

Dr. S.K.Yap was the lead auditor with Mr. Shengfu Wu, Zhao Jie and Ms. Tian Lili as auditors for the certification audit. Mr. Zhou Weilei from Beijing Forestry University was an observer at the audit.

CVs of auditors

Dr. S.K.Yap, (sonkheong@hotmail.com):

Dr. Yap S. K. is currently an independent consultant on forestry, arboriculture and environment. He has a B.Sc. Hons. Second Class Upper (Botany) Ph. D. (Forest Biology) under the University of Aberdeen (Scotland) and University of Malaya Fellowship in Tropical Rain Forest Project. His working career started as a research officer in the Forest Research Institute Malaysia (FRIM) after his postgraduate research in the reproductive biology of forest trees. Prior leaving the institute he was the senior research officer and Program Leader for the Urban Forestry for the Enhancement of the Environment responsible for the development of research activities in urban forestry.

He left the government service and was in the corporate sector involving in landscape development projects of the nation before establishing a consultancy on forestry and environment. He is an independent auditor appointed by SIRIM QAS International Malaysia to conduct Forest Management Certification under the cooperation between SIRIM and Forest Stewardship Council (FSC) accredited certifier - Scientific Certification System (SCS) of USA and Malaysian Timber Certification Council. He had conducted over 100 forest management and RSPO audits under SCS/SIRIM-FSC and Malaysian Timber Certification Council. He was the Lead Auditor for 72 of the above assessment exercises. He is also an EMS ISO 14001 and RSPO auditor with SIRIM. He was the forest/flora ecology consultant for EIA study for landfill, thermal incinerator, forest conversion to plantation and aluminium smelter projects in the country. In 2005 he conducted 7 workshops and another one in March 2009 on EIA for the Malaysian Nature Society, Forest Certification for the Department of Forestry and another on macro EIA for the Forestry Department of Perak in 2006.

He has international experience as a FAO consultant for seed technology for the Indian Council of Forestry 1993. He was also a member of the International Union of Forestry Research (IUFRO) Working Party on Seed Problems, Member of the Acid Precipitation Committee of Japan International Forestry Promotion Organization. 1993 to 1995 and Project Leader ASEAN-Australian Tree Improvement Project in 1986 to 1987. He was actively involved with the ASEAN-Canadian Forest Tree Seed Project from 1985 to 1995 as co-chairman of the working group.

Outside his official duties Dr. Yap was the Hon. Secretary of the Malaysian Nature Society (MNS) 1992 to August 1996 and Council Member of the MNS 1989 to August 2000. He was also a member of the Technical Committee on National Park (Johor) Corporation. 1993 to 1995 and Alternate Member of the Board of Directors of the National Park Corporation (Johor) 1993 to 1995. On environmental related issues he actively participated as an Alternate Member of the National Environmental Quality Council, Ministry of Science, Technology and Environment from 1994 till 1996. He was also a member of the ad hoc Committee on EIA Review, Department of Environment. He was the Expedition Leader for The MNS Belum Expedition 1993-1994. In 2004 he conducted three workshops on EIA Review for the Malaysian Environmental NGOs under the sponsorship of DANIDA.

Auditor

Mr. Zhao Jie

Mr. Zhao Jie is currently an Associate Professor of Sustainable Forest Management of Plantation and Forest Product Market in Chinese Academy of Forestry, and has 14 years of experience in the field of forest management. He attended international training courses in FSC certification in Sweden, Chile and the UK and has over 5 years experience with FSC auditing in China.

Auditor

Mr. Shengfu Wu

Mr. Shengfu Wu graduated with a Master Degree majoring in Forestry Economy from Beijing Forestry University and a Bachelor Degree in Wood Science & Technology from Nanjing Forestry University. He has worked 24 years on forest products and forestry management with his initial career on research on forest products and quality management in the Institute and as an officer for the Department of Forest Industry of the Ministry of Forestry.

Shengfu has wide international experience and had held leadership position with the Raute Oyj China, and provide lectures for government, institutes, associations and university in different countries. He has also worked on both national and ISO standard team on wood based panel ISO/TC89 and timber ISO/TC218.

He is currently serving in the work program Towards Sustainable Management of Planted Forest of FAO and the Plantation Certification Scheme under the SFA thus familiar with the certification programs of FSC, PEFC and the China national scheme

His other trainings included the Timber Research and Development Association (TRADA U.K.) sponsored by FAO in 1990; timber processing technology in Nastola

Finland in 1995; ISO9001 training in LRAC –TRADA U.K. and earned the lead auditor certificate in 2004; auditor training on the CE marking and become the lead auditor in 2004; auditor training both in UK and USA on the FSC /CoC together with leader auditors in 2006 & 2007; received one week Forest Certificate training and one week ISO14001 from the State Forestry Administration and earn the certificate in 2007; and auditor training on the Forestry Management in 2008.

He is the Director of Green Panel Consulting and Director of the market department of China National Forest Products Industry Association from 2003 to present. He has also experiences in the administration and organization of scientific and technological studies in the forest industry market/project studies on different certification schemes on forest products industry from both home and abroad as well as management on the forest product industry on its technology, machinery, market etc. He is also in charge of short term missions, such as professional short term consultancies and studies.

From 1992-1994 he is the officer in the Department of Forest Industry of the Ministry of Forestry responsible for the administration and management on the forest industry, project evaluation and improvement on the forest industry with Import & Export policy for projects implementations. During 1984-1992 he was the deputy director of China National Testing Center on Wood Based Panels, China Academy of Forestry responsible for administration on wood based panels testing, projects implementation, business development. He has developed the different testing methods on the wood based panels, the product standards on the level of Industrial, national as well as international consulting on the product, quality, industry etc.

Auditor

Ms. Tian Lili

Ms. Tian Lili has a Bachelor Degree in Forestry from the Hebei Agriculture University from 2003 to 2007 and the specialization is forestry. She learned Silvics, Forestation, Forest conservation Science, Deforestation, Entomology , Foliage Quarantine Science, and other woodcraft etc. She is currently working in Green Panel Consulting responsible for the forest management certification for 3 years.

3.3 Assessment Process

3.3.1 Itinerary

Date	Time	Activities
7 December 2009	7:30 -19:00	Flight to Guangzhou and travel to the Wuhua.
Day 1 December 8 2009	9:00 -10:00 10:00– 12.30 13:30– 17:00 21:00-21:30	<p>Opening meeting at Anliu</p> <ul style="list-style-type: none"> • Lead Auditor briefing on the objectives of the certification evaluation assessment • Briefing by the FME on actions taken to attain FSC Certification specifications following the pre-certification assessment. • Review of documentation <p>Document Review</p> <p>Meeting with the Representative from the County Government Administration Office, Forestry Agency and Environmental Protection Agency of Wuhua County.</p> <p>Auditors meeting</p>
Day 2 9 December 2009	8:30 – 14:00 14:00- 15:00 17:00 –18:00	<p>Inspection of Eucalyptus forest in Hengpi Village, Zhanglian Village and Lanbu village in Hengpi Town, and Wantang village in Anliu Town.</p> <p>Visit to a local community</p> <p>Meeting with harvesting contractor, villagers</p> <p>Visit to the protected forest of the Forestry</p> <p>Meeting with Mr. Wen Haoquan, the vice-president of Wuhua County.</p> <p>Auditors meeting</p>
Day 3 10 December 2009	8:30-12:00 13:00-14:30 14:30–16:00	<p>Review of documentation and Preparation of closing report</p> <p>Inspection the FMU Fuhua village.</p> <p>Closing meeting.</p>
Day 4 11 December 2009	9:00-	Auditors leave, travel to Guangzhou,

3.3.2 Evaluation of Management System

For this evaluation assessment all documentation were examined in the office of Wuhua County Senhui Forest Development Co., Ltd office at Anliu.

3.3.3 Selection of FMU's to Evaluate

The forest management operation undergoing certification consists of a single Forest Management Unit (FMU) but with harvesting areas spread over 3 geographical regions 20 villages of the Wuhua County.

3.3.4 Sites Visited

The field inspection was conducted in the 3 geographical zones and subunits of the FMU, These were Hengpi village and Zhanglian in Hengpi Town, Lanbu village in Zhoujiang Town, Wantang village in Anliu Town and Fuhua village in Anliu Town.

3.3.5 Stakeholder Consultation

Pursuant to SCS protocols, consultations with key stakeholders were an integral component of the evaluation process. Consultation took place prior to and concurrent with the field evaluation. The following were distinct purposes to the consultations:

To solicit input from key stakeholders as to the applicability of the SCS interim draft standard, as modified to reflect forest management in China.

To solicit input from affected parties as to the strengths and weaknesses of Wuhua County Senhui Forest Development Co., Ltd. management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.

To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests.

Principal stakeholder groups of relevance to this evaluation were identified based upon results from the scoping evaluation. The following types of groups and individuals were determined to be principal stakeholders:

- Wuhua County Senhui Forest employees in the field
- Contractors for harvesting
- Local communities
- Local and regionally-based environmental organizations and conservationists
- Local and regionally-based social interest organizations
- Local government organizations

The evaluation team contacted individuals and organizations within each of these stakeholder groups prior to the assessment by e mail. In total, 11 groups and individuals were approached. Names of groups and individuals that commented and were willing to allow names be listed in the report, are listed below:

Name	Affiliation	Consultation
Mr. Wen Haoquan	Vice-President, Wuhua County Administration	Interview
Mr. Li Yong	Vice-President, Anliu Town Administration	Interview
Ms. Yan Lanfang	Deputy Director General, Wuhua County	Interview

	Forestry Agency	
Mr. Zeng Chonghui	Vice-President, Wuhua County Environmental Agency	Interview
Mr. Chen Songrui	Team Leader, Wuhua County Forest Police	Interview
Mr. Zhang Qunyang	Deputy section chief, Anliu Town Industrial and Commercial Bureau	Interview
Mr. Wang Wenjie	Contractor for Forest Construction brigade	Interview
Ms. Li Yixiu	Local community	Interview
Mr. Lai Mingxi	Local community	Interview
Mr. Lai Yaolin	Local community	Interview

3.3.5.1 Summary of Stakeholder Concerns and Perspectives and Responses from the Team Where Applicable

3.3.5.2

Environmental groups

Comment/Concern	Response
<ul style="list-style-type: none"> There were no response from these groups 	Although no response was received inspection of all environmental impacts was conducted.

Community Groups & Local Residents, Including Indigenous Peoples

Comment/Concern	Response
<ul style="list-style-type: none"> The representatives interviewed were supportive of the FME's plantation. The local communities did not have the capability to venture into reforestation of the barren area. They could also earn incomes from the rental and also able to work with the FME. 	Documented comments

Governmental Organizations

Comment/Concern	Response
<ul style="list-style-type: none"> Governmental Administrative Office of Wuhua County supported the plantation project. In addition in increasing employment opportunities to the county the reforestation also fulfilled the objective of the government to green all barren land. 	Noted the positive comments
<ul style="list-style-type: none"> Forestry Bureau Wuhua County expressed its appreciation on the project as it provided opportunities for extra income for the local communities. The degraded areas had now been reforested with fast growing Eucalyptus trees which enhanced the greening program of the Bureau. All planting program and harvesting would be under the guidance of the Bureau. This control was through the agreement between the FME and the Bureau. It also issued certificates to qualified contractors who worked with the FME. 	Recorded the positive remarks and took action on the compliance with the agreement between the FME and the Forestry Bureau.

<ul style="list-style-type: none"> Environmental Protection Bureau Wuhua County supported the project as the planted trees in the barren area had improved the environmental qualities of the region. Water quality had improved with the tree cover and there was also proper surveillance which reduced the incidence of fire. Water catchment areas were also excluded from the project. 	Noted the response
<ul style="list-style-type: none"> Wuhua County Administration reported no complaints from the local communities. The workers of the FME had been paid according to standard rate although many of the younger people had been seeking employment outside the county. The FME had also respected the religious and burial grounds of the local communities. 	Noted the response.

Employees and Contractors:

Comment/Concern	Response
<ul style="list-style-type: none"> The contractors reported good working relationship with the FME. They were experienced in the different aspects of plantation and had been certified under the Forestry Bureau. Employees of the FME were keen to be undergoing the certification process. No major issues were raised. 	Noted the response

Comments on Draft Interim Standard

Comments	Response
<ul style="list-style-type: none"> Non of the agencies or individual commented on the interim standard 	Despite the absence of response the auditors had noted specific issues that may have to be reviewed.

3.3.6 Other Assessment Techniques

Only field surveys of selected sites within the Eucalyptus plantation of the FMU were conducted while documentation assessment was done in the office at Anliu, Wuhua County.

This report was submitted to two Peer Reviewers for comments and assessment of the CARs raised during the audit.

3.4 Total Time Spent on full-evaluation audit

A total of 15 person-days was spent on this evaluation audit. One day was for preparation and 11 days were spent in reviewing documents and site inspection with 3 days for report writing.

3.5 Process of Determining Conformance

FSC accredited forest stewardship standards consist of a three-level hierarchy, Principle, then the Criteria that make up that principle, then the Indicators that make up each criterion. Consistent with SCS Forest Conservation Program evaluation protocols, the auditor determines whether or not the subject forest management operation is in conformance with every applicable indicator of the relevant forest stewardship standard. If not in conformance the auditor recommends additional actions required to achieve conformance prior to the full assessment.

4.0 RESULTS OF THE EVALUATION

Table 4.1 below, contains the auditor's findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. The table also presents the corrective action request (CAR) numbers related to each principle.

TABLE 4.1 NOTABLE STRENGTHS AND WEAKNESSES OF THE FOREST MANAGEMENT ENTERPRISE RELATIVE TO THE P&C

Principle/Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard	CAR/RECs
P1: FSC Commitment and Legal Compliance	<ul style="list-style-type: none"> ▪ Forest managers were committed to FSC P&C ▪ The FME had made payments to all fees due 	<ul style="list-style-type: none"> ▪ The area established with local tree species did not adhere to the requirement of local forestry bureau under the joint agreement specifying 20% of the total area of FMU. 	<ul style="list-style-type: none"> ▪ Major 2009.1
P2: Tenure & Use Rights & Responsibilities	<ul style="list-style-type: none"> ▪ Documented long term lease agreement on its tenure and use rights for the plantation area. ▪ Local communities were able to collect forest resources from the FMU. ▪ Procedure for dispute resolution written. 	<ul style="list-style-type: none"> ▪ None noted. 	
P3: Indigenous Peoples' Rights	<ul style="list-style-type: none"> ▪ Not applicable in China 		
P4: Community Relations & Workers' Rights	<ul style="list-style-type: none"> ▪ The FME has provided benefits to staff in accordance to all national laws ▪ Opportunities for employment had been provided to local communities ▪ Training had been provided to staff members 	<ul style="list-style-type: none"> ▪ The requirement of providing safety equipment to all workers had not been clearly specified in the contract documents with the FME contractors. ▪ There was no record of accidents in the work site. ▪ No record of the routine inspection of safety equipment was presented. ▪ Data from the social impact report had not been analyzed and no follow up action developed. 	<ul style="list-style-type: none"> ▪ Minor CAR 2009.2 ▪ Minor CAR 2009.3 ▪ Minor CAR 2009.11 ▪ REC 2009.1

P5: Benefits from the Forest	<ul style="list-style-type: none"> ▪ Financial allocation for environmental management had been provided in the management plan ▪ All harvested timber would be utilized and residual materials would be left in the field as mulching to minimize wastage ▪ In addition to Eucalyptus timber, the management plan has also established management practices for other tree species found within the FMU ▪ The management plan had indicated sustainable production of Eucalyptus based on data collected 	<ul style="list-style-type: none"> ▪ None noted. 	
P6: Environmental Impact	<ul style="list-style-type: none"> ▪ An EIA report has been written for the FMU ▪ Use of chemicals is confined to pests and diseases control ▪ Eucalyptus harvesting is presently manually done thus minimal impact on the forest ▪ Buffer belts for major rivers had been demarcated. 	<ul style="list-style-type: none"> ▪ The FME did not complete site-level environmental impact assessments prior to commencement of site disturbing activities. ▪ The construction of roads had not followed the specifications of the EIA report. ▪ 	<ul style="list-style-type: none"> ▪ Minor CAR 2009.4 ▪ Minor CAR 2009.5
P7: Management Plan	<ul style="list-style-type: none"> ▪ An approved Forest Management Plan had been prepared. ▪ A public summary is available 	<ul style="list-style-type: none"> ▪ The management plan did not contain comprehensive description of forest resource base including protected areas, planned management activities and land ownership. ▪ The workers had not been adequately trained on the implementation of the management plan. ▪ The FMP and its public summary could be improved with a description of the establishment of the plantation which was from barren land without any trees. 	<ul style="list-style-type: none"> ▪ Minor CAR 2009.6 ▪ REC 2009.2
.P8: Monitoring & Assessment	<ul style="list-style-type: none"> ▪ Records of planting and silvicultural practices within the FMU were presented. ▪ Research backing provided ▪ COC maintained with a removal pass documentation issued by local Forestry Bureau. 	<ul style="list-style-type: none"> ▪ Regeneration, conditions of the forest, changes in the flora and fauna, environmental and social impacts of harvesting and other operations had not been systematically investigated. 	<ul style="list-style-type: none"> ▪ Minor CAR 2009.7

P9: Maintenance of High Conservation Value Forest	<ul style="list-style-type: none"> ▪ Preliminary surveys were conducted to assess presence of HCVF attributes in 2009. ▪ The management plan included specific measures for maintenance and enhancement of HCVF sites. ▪ A public summary of HCVF maintenance was presented. 	<ul style="list-style-type: none"> ▪ The FME had not consulted with all relevant stakeholders on the attributes of HCVFs. 	<ul style="list-style-type: none"> ▪ Minor CAR 2009.9
P10 : Plantation	<ul style="list-style-type: none"> ▪ The FME had maintained a plantation of Eucalyptus but under the requirement of the agreement with the Forestry Bureau 20% had to be established with indigenous species. ▪ The planting schedule from 2004 to 2007 had resulted in a diversity of age classes and rotation patterns within the plantation. ▪ Eucalyptus species planted in the FME had been subjected to long period of experimentation in the Province. ▪ Monitoring process had been developed to prevent pests, diseases and fires. 	<ul style="list-style-type: none"> ▪ The FME could develop a larger number of varieties and provenances to be established within the FMU. 	<ul style="list-style-type: none"> ▪ Minor CAR 2009.9 ▪ Minor CAR 2009.10 ▪ REC 2009.3

4.2 Preconditions

Preconditions are major corrective actions request that are placed on a forest management operation after the initial evaluation and before the operation is certified. Certification cannot be awarded if open preconditions exist.

The following pre-condition was placed on Wuhua County Senhui Forest Development Co., Ltd during its initial evaluation.

Non-conformity: As prescribed within the agreement signed with the local forestry bureau the FMU has to maintain 20% of its area to be planted with local tree species. The area to be planted as specified had not been identified thus not in compliance with local regulation.	
MAJOR CAR 2009.1	The FME shall identify the area specified under the agreement with the local forestry bureau for planting with local species and draw up a work plan for its implementation.
Reference	Criterion 1.1.2
Action taken by FME in January 2010	The FME presented a summary of the area planted with indigenous species from 2004 to 2007 totalling 667.6 ha. This represents 19.75% of the total FMU area. This area consists of riparian buffers and steep slopes which are protected and not established with Eucalyptus.
Status January 2010	This Major CAR is closed. Refer to Minor CARs 2009.9 and 2009.10.

5.0 CERTIFICATION DECISION

5.1 Certification Recommendation

As determined by the full and proper execution of the SCS *Forest Conservation Program* evaluation protocols, the evaluation team hereby recommends that the Wuhua County Senhui Forest can not be awarded FSC certification as a “Well-Managed Forest” until the Major CARs described above have been addressed. With the follow up action conducted by the FME in closing the Major CAR Wuhua County Senhui Forest can now be considered for FSC certification.

5.2 Initial Corrective Action Requests

Non-conformity: Safety equipment is to be made available to all workers in accordance
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to the nature of worker activity and regulatory requirement and workers are trained in its use. This requirement had not been clearly specified within the contract documents with the FME contractors.	
CAR 2009.2	The FME shall revise all contract documents with contractors to include the need to provide all safety equipment to their workers.
Deadline	All records must be made available by the 2010 annual surveillance assessment.
Reference	Indicator 4.2.3

Non-conformity: Forest manger of the FME had not maintained up-to-date safety records and to ensure that the safety statistics to be exemplary performance relative to industrial norms.	
CAR 2009.3	The FME shall maintain the safety records and made available during assessment.
Deadline	By the 2010 annual surveillance assessment.
Reference	Indicator 4.2.6

Non-conformity: Project (site)-level environmental impact assessments, scaled to the size and complexity of operations, had not been systematically completed prior to commencement of site disturbing activities.	
CAR 2009.4	The FME shall complete site-level environmental impact assessments according to scale and complexity of operations prior to commencement of site disturbing activities.
Deadline	The records must be available by the 2010 annual surveillance assessment.
Reference	Indicator 6.1.2

Non-conformity: The construction of roads and their maintenance had not been in full compliance in all sites within the FMU with written standards to ensure road surfaces were well drained, culverts installed for water drainage.	
CAR 2009.5	The FME shall construct and maintain all roads in accordance to written standards in all the sites.
Deadline	By the 2010 annual surveillance assessment.
Reference	Indicator 6.5.5

Non-conformity: The Forest Management Plan 2010-2015 presented did not contain comprehensive description of forest resource base including protected areas, planned management activities and land ownership.	
CAR 2009.6	The FME shall draw maps that describe forest resource base including protected areas, planned management activities and land ownership.
Deadline	Such records shall be made available by the 2010 annual surveillance assessment.

Reference	Indicator 7.1.1
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Non-conformity: Regeneration, conditions of the forest, changes in the flora and fauna, environmental and social impacts of harvesting and other operations had not been systematically investigated.	
CAR 2009.7	The FME shall develop a plan for the monitoring of flora and fauna, environmental, social and growth parameters.
Deadline	By the 2010 annual surveillance assessment.
Reference	Indicator 8.2.1

Non-conformity: The assessment for the presence of HCVPs had not included all relevant stakeholders especially the local communities.	
CAR 2009.8	The FMU shall consult with all relevant stakeholders on the attributes of HCVPs.
Deadline	By the 2010 annual surveillance assessment.
Reference	Indicator 9.1.2

Non-conformity: According to Chinese regulations forest management units (FMUs) have to maintain at least 5% of their management area for natural restoration. In this FMU, in accordance to the agreement the FME signed with the local Forestry Bureau, the restoration area had been set at 20% of its management area. No harvesting would be allowed within these protected forest sites. The area to be planted as specified had been documented to represent 19.75% of the total FMU area after the evaluation assessment.	
MINOR CAR 2009.9	The FME shall detail a plan and timeline to bring the area of restoration of natural forest area up to at least 20% as agreed with the local forestry bureau, including the selection of sites for restoration of native forest. These areas would be inspected during the surveillance assessment.
Deadline	By the 2010 annual surveillance assessment.
Reference	Indicator 10.5.2

Non-conformity: The area to be planted and protected as native forest cover as specified had been documented to represent 19.75% of the total FMU area after the evaluation assessment. These areas of natural forest or natural vegetative cover have not been delineated on maps or in the field for purposes of assuring protection.	
MINOR CAR 2009.10	The FME shall demarcate and map the areas planted with native species. As appropriate to ensure their protection, the FME shall delineate these protected areas of native vegetation.
Deadline	By the 2010 annual surveillance assessment.
Reference	Indicator 10.5.3

Non-conformity: Management activities has to be modified as appropriate in response to the results of social impact assessment	
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MINOR CAR 2009.11	The FME has conducted social impact survey and data obtained shall be analyzed and follow up action to be developed.
Deadline	By the 2010 annual surveillance assessment.
Reference	Indicator 4.4.1

5.3 Recommendations

Background/Justification: The FME contract with the local forestry bureau to plant Eucalyptus on the barren land.	
REC 2009.1	The FMP of the FME should include a description of the establishment of the plantation was from barren land without any trees and this is to be included in the public summary.
Reference	Criterion 7.4 Indicator 7.4.1

Background/Justification: Only a small proportion of the FME should be converted to plantation.	
REC 2009.2	All residual native tree species found within the FME are to be protected.
Reference	Criterion 6.10 Indicator 6.10.1

Background/Justification: A broader variety of species and provenances to be employed in the planting.	
REC 2009.3	The FME could develop a larger number of varieties and provenances to be established within the FMU.
Reference	Criterion 10.3 Indicator 10.3.1

6.0 SURVEILLANCE EVALUATIONS

If certification is awarded, surveillance evaluations will take place at least annually to monitor the status of any open corrective action requests and review the continued conformance of Wuhua County Senhui Forest Development Co. Ltd to the FSC Interim Standard for Forest Management Certification in China (February 23, 2009). Public summaries of surveillance evaluations will be posted separately on the SCS website (www.scs-certified.com).

7.0 SUMMARY OF SCS COMPLAINT AND APPEAL INVESTIGATION PROCEDURES

The following is a summary of the SCS Complaint and Appeal Investigation Procedure, the full versions of the procedures are available from SCS upon request. The SCS Complaint and Appeal Investigation Procedures are designed for and available to any individual or organization that perceives a stake in the affairs of the SCS Forest Conservation Program and that/who has reason to question either the actions of SCS itself or the actions of a SCS certificate holder.

A **complaint** is a written expression of dissatisfaction, other than **appeal**, by any person or organization, to a certification body, relating to the activities of staff of the SCS Forest Conservation Program and/or representatives of a company or entity holding either a forest management (FM) or chain-of-custody (COC) certificate issued by SCS and duly endorsed by FSC, where a response is expected (ISO/IEC 17011:2004 (E)). The SCS Complaint Investigation Procedure functions as a first-stage mechanism for resolving complaints and avoiding the need to involve FSC.

An “**appeal**” is a request by a certificate holder or a certification applicant for formal reconsideration of any adverse decision made by the certification body related to its desired certification status. A certificate holder or applicant may formally lodge an appeal with SCS against any adverse certification decision taken by SCS, within thirty (30) days after notification of the decision.

The written Complaint or Appeal must:

- Identify and provide contact information for the complainant or appellant
- Clearly identify the basis of the aggrieved action (date, place, nature of action) and which parties or individuals are associated with the action
- Explain how the action is alleged to violate an SCS or FSC requirement, being as specific as possible with respect to the applicable SCS or FSC requirement
- In the case of complaints against the actions of a certificate holder, rather than SCS itself, the complainant must also describe efforts taken to resolve the matter directly with the certificate holder
- Propose what actions would, in the opinion of the complainant or appellant, rectify the matter.

Written complaints and appeals should be submitted to:

Dr. Robert J. Hrubes
Senior Vice-President
Scientific Certification Systems
2200 Powell Street, Suite 725
Emeryville, California, USA94608
Email: rhrubes@scscertified.com

As detailed in the *SCS-FCP Certification Manual*, investigation of the complaint or appeal will be confidentially conducted in a timely manner. As appropriate, corrective and preventive action and resolution of any deficiencies found in products or services shall be taken and documented.

