

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

**Anhui Longhua Bamboo Product 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-00125G**

**Date of Field Audit: October 28-30, 2009**

**Date of Final Report: June 07, 2010**

**Submitted to:**

**Anhui Longhua Bamboo Product Co., Ltd**

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## **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 pre-evaluation process, the management programs and policies applied to the forest, and the results of the pre-evaluation. Section A will be posted on the SCS website ([www.scscertified.com](http://www.scscertified.com)). Section B contains more detailed results and information for the use of Anhui Longhua Bamboo Product Co. Ltd.

## FOREWORD

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by Anhui Longhua Bamboo Product Co., Ltd to conduct a compliance certification evaluation of its bamboo forest. 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 27-30 Oct 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 were major non-compliances resulting in Major Corrective Action Requests (CARs) being raised, documentation verification was required to reassess the corrective actions taken to close these Major CARs.

As detailed below, three pre-conditions (also known as Major Corrective Action Requests) that were stipulated by the audit team upon completion of the field audit were to be addressed by Anhui Longhua Bamboo Product 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](http://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	Anhui Longhua Bamboo Product Co. Ltd
Contact person	Mr. Yu Liangchong
Address	Economic Development Zone, Huoshan County, Anhui Province, China 237200
Telephone	+86 564-5222866
Fax	+86 564-5222867
E-mail	fyl@guoyabamboo.com
Certificate Type	Group
Number of FMU's	16
Number of FMUs in scope that are	
less than 100 ha in area	0
100 - 1000 ha in area	16 Total ha = 6777
1000 - 10 000 ha in area	0
more than 10 000 ha in area	0
Location of certified forest area	
Latitude	31° 00' to 31° 33'
Longitude	115° 55' to 116° 43'
Forest zone	
Total forest area in scope of certificate which is included in FMUs that:	
are less than 100 ha in area	0
are between 100 ha and 1000 ha in area	0
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	0
Total forest area in scope of certificate which is:	
privately managed <sup>1</sup>	7153
state managed	0
community managed <sup>2</sup>	0
Number of forest workers (including contractors) working in forest within scope of certificate	565 forest workers
Area of forest protected from commercial harvesting of timber and managed primarily for conservation objectives	About 375.7 ha.
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Area of forest classified as 'high conservation value forest'	Preliminary survey indicated the absence of HCVF attributes
List of high conservation values present <sup>3</sup>	None.

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

<sup>2</sup> 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.

Total area of production forest (i.e. forest from which timber may be harvested)	6777.8 ha with bamboo cover
Area of production forest classified as 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF)	0
Area of production forest regenerated primarily by replanting <sup>4</sup>	0
Area of production forest regenerated primarily by natural regeneration	6777.8 ha of bamboo forest
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	Bamboo <i>Phyllostachys pubescens</i> , tree species Chinese fir ( <i>Cunninghamia lanceolata</i> ) and Pine ( <i>Pinus massoniana</i> )
Approximate annual allowable cut (AAC) of commercial timber	2,600,000 poles to 3,100,000 poles per year
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
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.)	Bamboo poles.

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<sup>3</sup> 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](http://www.ProForest.net)

<sup>4</sup> 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.

## 1.2 Management Context

Anhui Longhua Bamboo Product Co., Ltd has been approved by the government to contract from the local commutes to harvest and reforest an area of 6,777.8 ha within the county of Huoshan in Anhui Province. This site is forested mainly by bamboo that has been established by the local commutes over many decades. Its main activity is the harvesting of bamboo mainly of the monopodial species of *Phyllostachys pubescens* within the plantation. The bamboo forests are located in 15 villages and 1 forest farm in Houshan County. Each village is made up of bamboo forest, deciduous forest (secondary forest), and agricultural land. Since ALB does not own or have tenure rights to these forests- this FSC assessment is being designed as a group assessment. ALB is the group manager (or group entity) and the 15 Villages and 1 forest farm are the group members. The names and acreages of the group members are listed in Table 1 (page 11).

In the group member villages the bamboo has been established over many decades. ALB's main activity is the harvesting of bamboo, all of the monopodial species of *Phyllostachys pubescens*.

Harvesting of bamboo poles starts at age four but not exceeding seven years as this period is considered the optimum yield of the bamboo. Projected production of the bamboo is at 2,600,000 poles to 3,100,000 poles annually.

The principal regulations of greatest 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)
- Desertification 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 Huoshan County distributed within 3 regions and 1 forest farm in the county. It has a topographical variation from 350m to 800m with the highest site located on the southeast of the county. The vegetation consisted originally mainly of subtropical broadleaf species. The area is now dominated by the monopodial bamboo species of *Phyllostachys pubescens* with a small amount of Gymnospermous and broadleaf tree species found within the same bamboo forest.

The FMU has conducted an Environmental Impact Assessment of the bamboo forest to assess the biological resources, potential impacts and the social composition of the county. It has also elaborated on the mitigation measures required. The report indicates that the existing water qualities within the county to be good. Records obtained the area were within the national acceptable levels. Owing to the small size of each bamboo patch harvesting activities have not created serious environmental impacts.

### **1.2.2 Socioeconomic Context**

The local communities have leased their land to the company for management and production of mainly bamboo poles. The lease is for 50 years and is monitored by the County Forestry Bureau. The landowners, who are mainly farmers, have through the years established themselves within and around the bamboo forests planting mainly agricultural crops. They are still permitted to conduct their traditional farming practices supplementing their incomes by being contractors of the company for bamboo poles harvesting and tending of the bamboo forest. From meetings with representatives of the communities they are generally happy with the present arrangement and have no specific grievances on the operation of the company.

## **1.3 Forest Management Enterprise**

### **1.3.1 Land Use**

The bamboo forest sites leased by the company are distributed in 3 towns of Huoshan County. The lease is through a rental system with annual payment per hectare as specified in a contract supervised by the Forestry Agency. These are managed by 3 geographical units in 16 villages and divided into 205 harvesting units. The biggest region is in Gaoling village, covering an area of 850.4 ha. The second region is Foziling village covering an area of 809.0 ha. The smallest is Shiyanghe village, of only 127.4 ha. The distribution of the various units and area is shown in Table 1 on the following page.

**TABLE 1**  
**Distribution of the bamboo and natural forest units within the 16 FMUs**

乡镇/林场	村委会 Village	认证毛竹面 Bamboo Area (Hectares)	其中阔叶树 种面积 (Hectares) Natural Forest reserve	占百分比 Percentage FMU in Natural Forest Reserve
佛子岭镇	汪家冲村 – Wangjiachong	276.253	17.127	6.2%
	通水灌村 – Tongshuiguan	371.326	19.680	5.3%
	留家园村 – Liujiayuan	440.0887	24.204	5.5%
	高岭村 – Gaoling	850.444	42.522	5.0%
	佛子岭村 – Foziling	809.049	48.542	6.0%
	长岭村 – Changling	824.73	42.885	5.2%
诸佛庵镇	石家河村 – Shijiahe	764.35	38.981	5.1%
	小堰口村 – Xiaoyankou	290.743	14.537	5.0%
	桃源河村 – Taoyuanhe	618.256	33.385	5.4%
大化坪镇	大化坪村 – Dahuaping	169.216	10.152	6.0%
	舞旗河村 – Wuqihe	275.1287	17.883	6.5%
	俞家畈村 – Yujiafan	355.1	23.791 7	6.7%
	石洋河村 – Shiyanghe	127.433	7.900866	6.2%
	王家河村 – Wangjiahe	193.7167	12.397866	6.4%
	白莲崖村 – Bailianya	239.113	12.194	5.1%
茅山林场	茅山林 – Maoshan Forest Farm	172.9	9.509	5.5%
总计Total	6777.85 hectares		375.69 hectares	

### 1.3.2 Land Outside Scope of Certification

The scope of the certificate is comprised of the 16 FMUs under contract with ALB to supply bamboo. In some cases, the villages do have other land outside of these 16 FMUs. However, since this is a group certification of ALB (which does not own any other land) the partial certification requirements do not apply.

## **1.4 Management Plan**

### **1.4.1 Management Objectives**

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

- Increase productivity of the bamboo forest through proper management techniques
- Improve regeneration of selected tree species through planting
- Protect forest resources and ecological functions
- Enhance fire protection measures and pests and diseases control
- Ensure sufficient funding for all these activities

### **1.4.2 Forest Composition**

This bamboo forest is dominated by the monopodial bamboo species of *Phyllostachys pubescens*. Small patches of forest with Coniferous and broadleaf tree species are also present in the FMUs. The first group consists mainly of Chinese fir (*Cunninghamia lanceolata*) and Chinese Red Pine (*Pinus massoniana*), both of which are of commercial importance.

### **1.4.3 Silvicultural Systems**

The forest area is presently managed to optimize production of the monopodial bamboo species of *Phyllostachys pubescens*.

Eventually, as indicated in the Forest Management Plan, harvesting will also be carried out on the small amount of Chinese fir (*Cunninghamia lanceolata*) and Chinese Red Pine (*Pinus massoniana*) within the forest. Artificial regeneration by seedlings will also be implemented to supplement the available naturally regenerated trees.

### **1.4.4 Management Systems**

It was estimated in the Forest Management Plan (2008 to 2018) that there are 6777.8 ha of *Phyllostachys pubescens* and native tree species in the FMU. The bamboo species is harvested at the age of 6 years but not exceeding 7 years for optimum yield. Following harvesting natural regeneration is practiced with culling of the bamboo shoots produced to ensure optimum growth of the retained shoots. Annual harvest is projected at 2,600,000 poles to 3,100,000 poles and about 33 poles per mu (1 ha = 15 mu).

#### **1.4.5 Monitoring System**

The monitoring system is developed in line with the National Forestry Act with an integrated and preventive approach. Growth data of each species is documented within the area. There are written guidelines on monitoring in *Forest Monitoring & Evaluation Plan* and *Chain of Custody Management Procedure*. These guidelines were written in preparation of the certification assessment and data from periodic monitoring were not presented. Growth data projected for bamboo and tree species were presented in the Forest Management Plan. Also see CAR 2009.13.

There is also a defined system of monitoring the transportation of bamboo poles from the harvesting sites to the mill. The bamboo poles are harvested from designated plots by the harvesting contractors and loaded onto trucks. A docket slip recording the number of bamboo poles, size of poles as well as their origin, receiving point of the bamboo, driver name, vehicle number, date and time of transporting the bamboo poles is issued for each load. These data are then summarized in a transport certificate issued by its own bamboo flooring mill. The load of bamboo poles will only be accepted at the factory when the transport certificate is in order following verification.

#### **1.4.6 Estimate of Maximum Sustainable Yield**

The estimated productivity for the bamboo forest is at 2,600,000 poles to 3,100,000 poles annually. This was based on the area of bamboo forest and the estimated number of bamboo poles.

#### **1.4.7 Estimated, Current and Projected Production**

Based on the 10 year management plan the estimated production is at 2,600,000 poles to 3,100,000 poles annually. The FME is currently salvaging all broken bamboo poles damaged by the 2007 snow storm to encourage greater production of bamboo shoots for the next generation.

### **2.0 GUIDELINES/STANDARDS EMPLOYED**

The SCS Interim Standard for Forest Management Certification in China V 1.0.(January 22, 2009) was adopted for this full evaluation audit.

### **3.0 THE FULL EVALUATION ASSESSMENT PROCESS**

#### **3.1 Assessment Dates**

### 3.2 Assessment Team

#### **Dave Wager – FSC Lead Auditor**

Mr. Wager is Director of Forest Management Certification for SCS. During his 9 years as Director, Mr. Wager has administered the program and led Forest Management and Chain-of-Custody evaluations throughout the world. Mr. Wager has led assessments of 30 forest management operations worldwide including Minnesota DNR, Pennsylvania State Forests, Massachusetts State Forests, Potlatch Corporation's Idaho Forestlands and Oregon Poplar Tree Farm, Wisconsin County Forests, Collins Pine Company, Department of Defense-Fort Lewis Installation, and operations in Brazil, Canada, Costa Rica, Japan, and Malaysia.

In his role as Program Director, Mr. Wager oversees all first-time certification evaluations, annual audits, and contract renewal certifications on approximately 85 active certificate holders covering 30 million acres. In other natural resources work, Mr. Wager played a key role in the development of Starbucks CAFE Practices- a program to ensure procurement of sustainably grown and processed coffee. Mr. Wager has expertise in business and forest ecology (B.S. business, Skidmore College; M.S. Forest Resources, Utah State University) and utilizes both in his position with SCS. While studying forest ecology at Utah State University, Mr. Wager was awarded a NASA Graduate Student Research Fellowship to develop dendrochronological techniques to assess Douglas-fir growth in Utah's Central Wasatch Mountains.

Auditor

#### **Mr. Zhao Jie**

Mr. Zhao Jie has a Doctorate Degree in Forestry from the Beijing Forestry University and 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 completed Master Degree majoring in Forestry Economy from Beijing Forestry University in 1999 after his Bachelor Degree in Wood Science & Technology from Nanjing Forestry University in 1984. 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. He received full time training for 8 months under the Timber Research and Development Association (TRADA U.K.) sponsored by FAO in 1990; two weeks training on the timber processing technology in Nastola Finland in 1995; received one week ISO9001 training in LRAC –TRADA U.K. and earned the lead auditor certificate in 2004; received one week plus three side auditor training on the CE marking and become the lead auditor in 2004; received 4 side 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 received 2 side auditor training on the Forestry Management in 2008.

From 2003 to present he is the Director of Green Panel Consulting and Director of the market department of China National Forest Products Industry Association. 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.

He is the chief representative of Raute Oyj Beijing Office responsible for its administration on China business and projects implementations. He conducts study on the plywood technology in the China plywood industry comparing with the rest of the world. He also does market analysis for the Raute machinery possibilities on China plywood industry together with marketing and sales of Raute technology and machinery and well as the reconditioned machineries.

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.

Other experiences are 1999/5(2001/9) in the Sino-Finland Forestry Project Meetings and Study with Ministry of Agriculture and Forestry in Helsinki, visit the Forestry Research Institute, Forestry department of the University, harvesting machinery & technology companies, also visit the different forest in Finland. 2004/5 U.K. –Bath University to provide two presentations on the bamboo industry and product quality for the under graduate students and post graduate students. Exchange the views with the professors on

the engineering product for the structure purpose. From 2006/1 Indonesian –Apkindo One week consulting works on forest management and products development and its marketing. Invited by the APKINDO Indonesia to provide a presentation in Jakarta for the forest industry representatives. Visits to the forestry, processing manufactures, meeting and discussion with the Ministry of Forestry, Industry Association and the manufactures to illustrate the problems, improvement of the management and processing technology and product quality and marketing. 2007/02 U.S.A Madison, WI Invited by the Forest Products Laboratory(FPL) of USDA Forest Service in One Gifford Pinchot Drive, Madison, WI to provide presentation on China Woodworking Industry and technical meetings with the FPL staffs on industrial and technical. 2007/04 Italy Venice Team leader to participate the ISO TC/89/S3 meeting, provide the presentation on the LVL and plywood development in China, provide two new ISO standard proposals on blockboard and fancy plywood. Study of comments on ISO/DIS 12466-1 “Plywood – Bonding quality – Part 1 : Test methods”, Study of comments on ISO/DIS 12466-2 “Plywood – Bonding quality – Part 2 : Requirements”, Study of comments on ISO/DIS 18776 “Laminated veneer lumber (LVL) – Definitions and requirements (enquiry close on 2007.03.12) ”. 2007/10 Ukraine Lvov. As team leader to participate the ISO TC/218 meeting, provide the presentation on the Development of the Woodworking Industry in China. Study of comments on ISO 3129: Wood –Sampling Methods and General Requirements for Physical and Mechanical Tests. Resolution of the meeting for WG 6 Wooden products. 2008/01 Thailand, Chiang Mai. Team member to participate the FAO activities on Towards Responsible Management of Planted Forest, A regional workshop for the implementation of the Voluntary Guidelines for Responsible Management of Planted Forests

### 3.3 Assessment Process

#### 3.3.1 Itinerary

Day 日期	Time 时间 ( am 上午、 pm 下午 )	Programme 程序
27 Oct 2009 2009 年 10 月 27 日	8 : 00 pm 8 : 30 pm	Arrival at Huoshan County 抵达霍山县 ,同审核员会合 Meeting among auditors 审核员会谈
Day 1: 28 Oct 2009 2009 年 10 月 28 日	8.30 am-10.00am	Opening Meeting 首次会议 <ul style="list-style-type: none"> <li>• Briefing by Lead Auditor on objectives of compliance assessment and programme 审核组长陈述评估目的</li> <li>• Briefing by forest manager of Anhui Longhua company on the Forest</li> </ul>

		<p>Management Plan and the activities of the FMU. 营林单位领导汇报经营方案和营林活动摘要。</p> <p>10.00 am-11.30 am Meeting with Heads of local communities, Forestry and Environment Agencies of the Province/County 会见当地社区、林业和环保部门领导</p> <p>1.30 pm-2.30 pm Meeting with local communities in Huoshan County 召开霍山县当地社区会议</p> <p>2.30 pm-5.30 pm Meeting with staff of the Forest Management Unit 召开森林经营单位员工会议 Documentation review 文件审核</p> <p>6.30 pm -7.30 pm Meeting of auditors 审核员会谈</p>
Day 2: 29 Oct 2009	<p>8.30 am – 11.30 am Meeting with local communities around the Forest Management Unit 会见森林经营单元周边社区</p> <p>1.30 pm-5.30 pm Visit to harvesting sites of the bamboo forest including discussion with workers and contractors Documentation of stump to gate COC 参观竹林采伐现场，并与工人和承包商会谈。伐桩文件 ( 连接 COC ) 。 Inspection of post felling sites with planting activities, rehabilitation areas and conservation areas (HCVF) within FMU 检查林地内采伐迹地的造林活动、生存环境和保护区域。 Nursery and chemical stores 苗圃、化学物质存储</p>	

	5.30 pm-6.00 pm	Meeting of auditors 审核员会谈
Day 3: 30 Oct 2009	8.30 am-11.00 am	Meeting among auditors on conformance of the FMU with FSC Principles and Criteria. 审核员判定森林经营单元是否符合 FSC 原则与标准
	11.00 am-11.30 am	Auditors preparation of closing meeting 审核员为末次会议做准备
	11.30 am-12.00 am	Closing Meeting 末次会议
	2 : 00 pm	Auditors leave for Hefei 审核员离开

### 3.3.2 Evaluation of Management System

For this evaluation assessment all documentation were examined in the office of ALB office and then verified in the field.

### 3.3.3 Selection of FMUs to Evaluate

The forest management operation undergoing certification consists of 16 Forest Management Units but with harvesting areas spread over 3 geographical regions of the Huoshan County. All three areas were selected to visit. 3 FMU's were visited during the initial assessment and one other was visited during the preliminary assessment.

### 3.3.4 Sites Visited

The field inspection was conducted in the three geographical zones covering the 16 group member FMU's. Only one of the sites inspected was undergoing bamboo pole harvesting. The process observed was manually conducted by contractors using a modified axe for cutting the bamboo poles and sliding the poles down the slopes. There was no skid trails at the site as in timber harvesting except for the network of harvesting roads used for transportation.

See section 3.3.1 for additional details

### **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 ALB 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:

- ALB employees in the field
- Contractors for harvesting
- Local communities
- Local and regionally-based environmental organizations and conservationists
- Local and regionally-based social interest organizations

The evaluation team contacted individuals and organizations within each of these stakeholder groups prior to the assessment by e mail. In total, 14 groups and individuals were approached but only the governmental agencies responded and they also attended the in-person interviews (see section 3.3.5.1 for a summary of their comments). Additional local stakeholders (farmers, neighbors, etc) were consulted during the field assessment. 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. Cai Yongqing	Deputy Head of Huoshan County Government office	Interview
Mr. Zheng Zongzhu	Deputy Head of Huoshan County Environmental Protection	Interview
Mr. Hao Jinglai	Deputy Director General, Huoshan County Forestry	Interview
Mr. Fang Yetao	Farmer in Zhufoan town	Interview
Mr. Cheng Yao	Farmer in Dahuaping Town	Interview
Mr. Wu Hanqing	Deputy Head of Foziling Town	Interview
Ms. Cai Lihong	Employee of FMU	Interview
Mr. Chen Xinhua	Employee of FMU	Interview
Mr. Song Yongfeng	Employee of FMU	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"> <li>There were no response from these groups</li> </ul>	None

##### Community Groups & Local Residents, Including Indigenous Peoples

Comment/Concern	Response
<ul style="list-style-type: none"> <li>Generally had expressed satisfaction with the present arrangement of leasing out their land.</li> <li>Able to utilize the bamboo forest for their livelihood without being hindered by the FMU</li> </ul>	Duly noted

##### Governmental Organizations

Comment/Concern	Response
<ul style="list-style-type: none"> <li>Governmental Administrative Office Huoshan County Stated that the FMU has provided excellent opportunities to local people job opportunities in the bamboo industry. The company has also obeyed all regulations of the county and paid all dues specified under the county administration.</li> </ul>	Duly noted
<ul style="list-style-type: none"> <li>Forestry Bureau Huoshan County The Bureau responded that the FMU has operated in the area in compliance with the forestry regulations Forest Laws of the People's Republic of China in its management of the bamboo forest. Its harvesting regime is within the level determined by the Forest Bureau taking conservation measures for flora and fauna. It has good silvicultural practices on encouraging good growth of the bamboo species.</li> </ul>	From the documentation provided and the field inspections conducted during the assessment the FMU has complied with all regulatory authorities. It has worked closely with the Forestry Bureau in the documentation of protected flora and fauna.
<ul style="list-style-type: none"> <li>Environmental Protection Bureau Huoshan County The Bureau confirmed that the FMU has not in the management process result in pollution of the surrounding environment.</li> </ul>	As in the case of the Forestry Bureau the FMU has good working relationship with the Environmental Protection Bureau.

Its operation has maintained proactive actions to protect the water resources and not permit any discharge of dangerous chemicals to the environment	
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**Employees and Contractors:**

<b>Comment/Concern</b>	<b>Response</b>
<ul style="list-style-type: none"> <li>Employees of the FMU</li> </ul> <p>The employees of the FMU had indicated some understanding of the specifications of FSC Principles and Criteria. There were no complaints on the conditions of employment.</p>	<p>Visited the contractors and employees and they did satisfy with Longhua company.</p>

**Comments on Draft Interim Standard**

<b>Comments</b>	<b>Response</b>
<ul style="list-style-type: none"> <li>None of the agencies or individual commented on the interim standard</li> </ul>	<p>None</p>

**3.3.6 Other Assessment Techniques**

Only field surveys of selected sites within the bamboo forest sites of the FMU were conducted while documentation assessment was done in the office at Huoshan County.

**3.4 Total Time Spent on pre-evaluation audit**

A total of 12 person-days were spent on this evaluation audit. One day was for preparation and 9 days were spent in reviewing documents and site inspection with 4 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 criteria. Consistent with SCS Forest Conservation Program evaluation protocols, the team collectively determines whether or not the subject forest management operation is in conformance with every applicable indicator of the relevant forest stewardship standard. Each non-conformance must be evaluated to determine whether it constitutes a major or minor non-conformance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in non-conformance. The team must use their collective judgment to assess each criterion and determine if it is in conformance. If the forest management operation is determined to be in non-conformance at the criterion level, then at least one of the indicators must be in major non-conformance.

Corrective action requests (CAR's) are issued for every instance of non-conformance. Major non-conformances trigger major CAR's and minor non-conformances trigger minor CAR's

***Interpretations of Major CAR's (Preconditions), Minor CARs and Recommendations***

*Major CARs/Preconditions:* Major non-conformances, either alone or in combination with non-conformances of other indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out prior to award of the certificate. If major CAR's arise after an operation is certified, the timeframe for correcting these non-conformances is typically shorter than for minor CAR's. Certification is contingent on the certified operations response to the CAR within the stipulated time frame.

*Minor CARs:* These are corrective action requests in response to minor non-conformances, which are typically limited in scale or can be characterized as an unusual lapse in the system. Corrective actions must be closed out within a specified time period of award of the certificate.

*Observations:* These are subject areas where the audit team concludes that there is conformance, but either future non-conformance may result due to inaction or the FME could achieve exemplary status through further refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However, observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into non-conformance.

## **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/OBS #s Note- CARs 2009.1-6 were Major CARs and have been closed
<b>P1: FSC Commitment and Legal Compliance</b>	Meetings with the Bureau of Forestry and Department of Environment confirmed that there have been no regulatory violations.	ALB staff lack an understanding of the agreements and how they apply to their forest management  There is a need to improve training of understanding of P&C across all levels of organization staff, villages, and contractors.	CAR 2009.7
<b>P2: Tenure &amp; Use Rights &amp; Responsibilities</b>	ALB maintains documentation of the legal use rights to the defined forest areas. There is evidence that individual farmer/family understands the arrangement and agrees with the terms of the contract.	SCS was unable to confirm that dispute resolution procedures have been implemented.	CAR 2009.8
<b>P3: Indigenous Peoples' Rights</b>	NA	NA	
<b>P4: Community Relations &amp; Workers' Rights</b>	Local preference for employment opportunities is specified in the contract with villages.  ALB provides safety gear and some safety training. First aid kits were available at the harvest sites.  The forest manager has through consultations with local communities	Training for the various aspects of works related to the bamboo forest is not adequate.  There was no record on safety  Documentation of the review process and records of outcome have not been made available during the assessment	CAR 2009.9 CAR 2009.10 CAR 2009.11

	clarified customary rights within the defined forest area.		
<b>P5: Benefits from the Forest</b>	<p>The projected harvesting rate of the main bamboo species is sustainable over the management period.</p> <p>The proposed budget written in the Forest Management Plan had projected capital investment into machinery and human resources to maintain/restore the productive capacity of the bamboo forest.</p> <p>During harvesting of the bamboo poles all the leaves are left behind in the forest, which provide the biomass for enriching the soil.</p>	<p>ALB is encouraged to diversify the mix of commercial timber (bamboo) or non-timber products</p> <p>There is an opportunity for ALB to assist the villages produce products from residual bamboo material.</p>	<p>OBS 2009.1</p> <p>OBS 2009.2</p>
<b>P6: Environmental Impact</b>	<p>Erosion control efforts are undertaken on steep slopes Forest are monitored daily to control hunting.</p> <p>Harvesting is done using individual stem selection. Each stand is maintained as a multi-age unit. As such connectivity of wildlife habitat is maintained.</p> <p>As reported by the Forestry Bureau-approximately 67% of the region is in either a reserve area or an ecological forest designation</p>	<p>Improvement in implementing environmental review is necessary</p> <p>Improvement in protection T&amp;E species is needed.</p> <p>Excessive trash was observed in one area of the forest.</p> <p>More training on resource protection is needed.</p>	<p>CAR 2009.12</p> <p>CAR 2009.13</p> <p>CAR 2009.14</p> <p>CAR 2009.15</p>

	<p>No chemical pesticides are used.</p> <p>ALB has implemented a program to control offsite expansion of bamboo</p>		
<b>P7: Management Plan</b>	<p>There is a master plan as well as individual plans for each of the 16 FMU's</p> <p>ALB's forest management plans appear to be functional and effective.</p> <p>Caretakers are the key link to ensuring that plans are implemented properly.</p>	<p>Training must be improved on select topic related to management</p> <p>There is a public summary of their forest management plan, but it does not include all the elements of criterion 7.1.</p>	<p>CAR 2009.9</p> <p>CAR 2009.15</p> <p>CAR 2009.16</p>
<b>P8: Monitoring &amp; Assessment</b>	<p>The ALB monitoring program is designed to collect information on 8.2. a-e</p>	<p>ALB must implement procedures for improved record keeping of monitoring activities, demonstrating how monitoring covers all requirements listed under Criterion 8.2.</p> <p>ALB has developed a public report for its water quality monitoring, however, the other monitoring requirements of 8.2 are not reported publically</p>	<p>CAR 2009.17</p> <p>CAR 2009.19</p>
<b>P9: High Conservation Value Forests</b>	<p>An assessment for HCVF has been completed.</p> <p>ALB completed consultations with Forestry Bureau, and Env Department, and questionnaires to individual villages for HCVF</p>	<p>ALB completed an HCVF assessment including consultation with experts (Forestry Bureau/villages), however, it seems that some possible areas may have been missed (e.g., Foziling Town- Gaoling village).</p>	<p>CAR 2009.20</p>
<b>P10: Plantations</b>			
<b>Group Criteria</b>	<p>Each group member is monitored weekly.</p>	<p>Group members need to better understand FSC requirements</p>	<p>CAR 2009.7</p>

## 4.2 Preconditions

Preconditions are major corrective action requests 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.

<p><b>Non-conformance:</b> ALB is not in conformance with Indicator 6.3.2 <i>Subject to the scale of operations, the forest operation is managed so as to maintain a full range of successional stages at distributions within the range of natural variability.</i></p> <p>At the time of the audit the scope of the assessment did not include the non-bamboo (natural forests) contained within the bamboo areas of each village. Thus- the only successional stage within the FMU is mature bamboo that is managed selectively. To meet Indicator 6.3.2., the natural forest within each FMU must be formally included in the scope of the certificate. The natural forest must be maintained as natural forest so that there are additional successional stages and forest types.</p>	
<p><b>Major CAR 2009.1</b></p>	<p>Redefine the scope of the certificate to include the natural (non-bamboo) forests of each village, and ensure that these areas are not converted to bamboo. This will require implementing mechanisms to avoid the spread of bamboo into native forests.</p>
<p><b>Deadline</b></p>	<p>Prior to Award of Certification</p>
<p><b>Reference</b></p>	<p>Indicator 6.3.2</p>
<p><b>Action Taken By Certificate Holder</b></p>	<p>ALB provided a revised description on the 15 villages and 1 forest farm contracted by ALB. The revised scope description details each forest land area to include the natural forest along with the bamboo forest.</p> <p>The measures taken for controlling the spread of the bamboo are:</p> <ul style="list-style-type: none"> <li>- Require the local people to maintain non-bamboo vegetation</li> <li>- To limit the spreading of bamboo. ALB will dig in the forest edge which is about 0.5 to 0.8 m, when the bamboo shoot gets to the trench they will cut them down to control the spread. If necessary, they will put some stones and calcareous matter into the trench.</li> </ul> <p>ALB implemented new procedures for maintenance of natural forests within/adjacent to bamboo forest. ALB also developed procedures for controlling expansion of bamboo forest. ALB has made a commitment to undertake measures to protect native broadleaf trees in bamboo forest and make sure that bamboo cannot expand into native forest area.</p>
<p><b>SCS Response</b></p>	<p>ALB has taken sufficient actions to ensure that natural forests are</p>

	included in the scope of the certificate and that natural forests will be protected to ensure conformance with Indicator 6.3.2.
<b>CAR Status</b>	CAR closed

<p><b>Non-conformance:</b> ALB is not in conformance with Indicator 7.1.1. as the management plan does not included specific information for each of the villages or group members. Per 7.1.1 the management plan must include:</p> <ul style="list-style-type: none"> <li>a) <i>the objectives of management</i></li> <li>b) <i>a description of the forest</i></li> <li>c) <i>how the objectives will be met, harvesting methods and silviculture (clear cuts, selective cuts, thinnings) to ensure sustainability</i></li> <li>d) <i>sustainable harvest limits (which must be consistent with FSC criteria 5.6)</i></li> <li>e) <i>plans for monitoring forest growth</i></li> <li>f) <i>environmental/ social impacts of the plan</i></li> <li>g) <i>conservation of rare species and any high conservation values</i></li> <li>h) <i>maps of the forest, showing protected areas, planned management and land ownership</i></li> <li>i) <i>Pest and weed control planned</i></li> <li>j) <i>Duration of the plan</i></li> </ul>	
<b>Major CAR 2009.2</b>	FMP must be updated to include specific information for items a-j that are unique for each village (group member).
<b>Deadline</b>	Prior to award of certification
<b>Reference</b>	Indicator 7.1.1
<b>Action Taken By Certificate Holder</b>	ALB provided SCS with comprehensive management plans covering each of the 16 group members as well as a master plan detailing objectives, strategies, etc across all of the villages.
<b>SCS Response</b>	The plans submitted to SCS are sufficient to address Indicator 7.1.4. SCS will check on the implementation of these plans during the first surveillance audit.
<b>CAR Status</b>	Closed

<p><b>Non-conformance:</b> ALB is not in conformance with Indicator: 8.3.2 For “<i>stump to forest gate chain of custody, there exist written descriptions of the materials handling and inventory control procedures (i.e., chain-of-custody procedures) to assure that logs from the certified forest area are not mixed with logs from uncertified sources.</i>”</p> <p>Written procedures exist, however, they lack detail and clarity. The level of understanding of the stump-to-gate requirements needs improvement.</p>	
<b>Major CAR 2009.3</b>	Prior to the deliver or sale of FSC certified material- ALB must revise its CoC stump-to-gate procedures so that they fully cover the FSC requirements.

<b>Deadline</b>	Prior to award of certification
<b>Reference</b>	Criterion 8.3.2
<b>Action Taken By Certificate Holder</b>	Anhui Longhua company applied the chain of custody certification for their mill and have a chain-of-custody management system to control the processing. For the bamboo forest, they also made a procedure on the supply chain which covers cutting and shipping to the mill. Special procedures on harvesting and shipping have been implemented. Harvesting procedure: The workers will use the scythe and take the bamboo poles to the mountain feet and there will be a special person to inventory the quantity and tie up the poles together and mark each bundle as FSC and to avoid the mixture with uncertified poles.
<b>SCS Response</b>	ALB's new CoC procedures are sufficient to address Indicator 8.3.2.
<b>CAR Status</b>	Closed

<b>Non-conformance:</b> ALB is not in conformance with requirements for group certification requirements. Items such as: <ul style="list-style-type: none"> <li>• an agreement from members/villages that the properties will be managed consistently with FSC requirements</li> <li>• Removal/sanctions/corrective action for group member non-conformance.</li> <li>• And other requirements as detailed in FSC-STD-30-005</li> </ul>	
<b>Major CAR 2009.4</b>	ALB must develop and implement a set of procedures for group certification that covers the requirements of FSC-STD-30-005
<b>Deadline</b>	Prior to Award of Certification
<b>Reference</b>	FSC-STD-30-005
<b>Action Taken By Certificate Holder</b>	ALB has developed and implemented group management procedures consistent with FSC-STD-30-005. The responsibilities for the group members and group manager (ALB) have been codified. Group members, who do not conform to the standards, will be removed from the group.
<b>SCS Response</b>	ALB's group procedures are adequate to cover FSC-STD-30-005. ALB group member have agreed to manage their properties in accordance with FSC requirements. Policies for sanctions and removal of non conforming groups have been memorialized. SCS will review the day-to-day implementation of these procures during the first surveillance audit.
<b>CAR Status</b>	CAR Closed

## 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 Anhui Longhua Bamboo be awarded FSC certification as a “Well-Managed Forest” subject to the corrective action requests stated in Section 5.2. The ALB has demonstrated that their system of management is capable of ensuring that all of the requirements of the SCS Interim Standard for China are met over the forest areas covered by the scope of the evaluation.

### 5.2 Initial Corrective Action Requests

<b>Non-conformance:</b> ALB is not in conformance with Indicator <i>1.2.1. Forest managers demonstrate a working knowledge of all applicable fees, royalties, taxes and other charges that apply to their operations.</i> Company has purchased safety insurance for workers. However, there is no evidence to demonstrate all workers are covered.	
<b>CAR 2009.5</b>	ALB must provide objective evidence that all workers are provided with necessary safety insurance.
<b>Deadline</b>	By the 2010 annual surveillance assessment.
<b>Reference</b>	Indicator 1.2.2

<b>Non-conformance:</b> ALB is not in conformance with Indicator <i>1.3.2 Forest managers demonstrate a sensitivity to all binding international agreements and endeavor to respect their requirements.</i> ALB staff have documents but are not fully aware of how the such agreements affect their operations.	
<b>CAR 2009.6</b>	ALB must demonstrate understanding of how applicable agreements apply to their management.
<b>Deadline</b>	By the 2010 annual surveillance assessment.
<b>Reference</b>	Indicator 1.3.2

<b>Non-conformance:</b> ALB is not in conformance with Indicator <i>1.6.2. Written copies of the FSC Principles &amp; Criteria are available to all management and field personnel;</i> ALB staff have copy of the FSC standard but the level of understanding throughout staff and contractors is very low.	
<b>CAR 2009.7</b>	ALB must implement additional training methods, and demonstrate how understanding of FSC Standard has improved among staff,

	villages, and contractors.
<b>Deadline</b>	By the 2010 annual surveillance assessment.
<b>Reference</b>	Indicator 1.6.2

**Non-conformance:** ALB is not in conformance with Indicator 2.3.1 *Records are kept of past disputes over tenure claims and use rights, to a level of detail sufficient to enable the SCS auditor(s) to ascertain the nature and magnitude of the disputes.* SCS was unable to confirm that dispute resolution procedures have been implemented. For example, there is no evidence that villages and contractors are aware of procedure for resolving disputes.

<b>CAR 2009.8</b>	ALB must ensure dispute resolution procedures are understood by villages and pertinent staff and contractors. A procedure for record keeping of disputes must be established.
<b>Deadline</b>	By the 2010 annual surveillance assessment.
<b>Reference</b>	Indicator 2.3.1

**Non-conformance:** ALB is not compliance with *Indicator 4.1.2 Forest managers contribute to or directly develop training programs designed to enhance the capabilities and qualifications of local workers*

<b>CAR 2009.9</b>	Training for the various aspects of works related to the bamboo forest is not adequate. The training must including safety, chemical use and environment protection.
<b>Deadline</b>	By the 2010 annual surveillance assessment.
<b>Reference</b>	Indicator 4.1.2

**Non-conformance:** ALB is not compliance with *Indicator 4.2.6 Forest managers maintain up-to-date safety records; worker safety statistics deemed from the records (e.g., types of injuries, rates and trends of accidents) such records indicate exemplary performance relative to industrial norms*

<b>CAR 2009.10</b>	ALB shall develop a program for maintaining records on worker safety. At a minimum, such records shall be updated annually.
<b>Deadline</b>	By the 2010 annual surveillance assessment.
<b>Reference</b>	Indicator 4.2.6

**Non-conformance:** ALB is not compliance with *Indicator 4.3.2. Issues and grievances raised by workers and/or their organizations are investigated promptly and in a manner that demonstrates fairness and objectivity*

<b>CAR 2009.11</b>	Documentation of the review process and records of outcome must be made available during the next audit.
<b>Deadline</b>	By the 2010 annual surveillance assessment.
<b>Reference</b>	Indicator 4.3.2

**Non-conformance:** ALB is not in conformance with Indicator 6.3.1 *Project (site)-level environmental impact assessments, scaled to the size and complexity of operations, are systematically completed prior to commencement of site disturbing activities Records are kept of past disputes over tenure claims and use rights, to a level of detail sufficient to enable the SCS auditor(s) to ascertain the nature and magnitude of the disputes.* A form for site level impact assessments has been developed, but it has not yet been implemented.

<b>CAR 2009.12</b>	ALB must implement documented procedures for site level impact assessments.
<b>Deadline</b>	By the 2010 annual surveillance assessment.
<b>Reference</b>	Indicator 6.1.1

**Non-conformance:** ALB is not in conformance with Indicator 6.2.3 *Field employees are trained in the recognition of endangered species and their habitats.* Interviews with the forestry bureau suggested that there were not many protected species in the areas that have bamboo- but nevertheless work is needed to protect the few that are there.

<b>CAR 2009.13</b>	ALB must work with the Forestry Bureau to monitor for and develop approaches to safeguard endangered species and their habitats. Efforts must include training and written material providing information about sensitive species and their habitats.
<b>Deadline</b>	By the 2010 annual surveillance assessment.
<b>Reference</b>	Indicators 6.2.1 and 6.2.3.

**Non-conformance:** ALB is not in conformance with Indicator 6.7.3. *There are on-site facilities for secure collection of chemical and solid non-organic waste.* Audit team observed areas of the forest with excessive trash on the ground, thus collection of non-organic waste is not sufficient.

<b>CAR 2009.14</b>	ALB must ensure non-organic waste is properly disposed of.
<b>Deadline</b>	2010 Surveillance Audit
<b>Reference</b>	Indicator 6.7.3

**Non-conformance:** ALB is not in conformance with Indicator 7.3.5. *Appropriate to the scale and intensity of operations, forest workers are duly trained, according to a documented protocol, as to their role in implementing the management plan Both employees and contractors receive sufficient levels of training with respect to the management plan.*  
SCS observed insufficient training.

<b>CAR 2009.15</b>	ALB must complete an analysis of training needs relative to the FSC standard, and provide evidence of implementing improved training programs.
<b>Deadline</b>	2010 Surveillance Audit
<b>Reference</b>	Indicator 7.3.5

<p><b>Non-conformance:</b> ALB is not in conformance with Indicator 7.4.1. <i>Interested stakeholders are readily able to obtain a public summary of the management plan, which provides information on the primary elements of the plan, including those enumerated in criterion 7.1</i></p> <p>The public summary does not include all primary elements of criterion 7.1 and is not readily available to stakeholders.</p>	
<b>CAR 2009.16</b>	The public summary must include all the elements of Criterion 7.1. The public summary must also be readily available (e.g., on the company website).
<b>Deadline</b>	2010 Surveillance Audit
<b>Reference</b>	Indicator 7.4.1

<p><b>Non-conformance:</b> ALB is not in conformance with Indicators: 8.1.2. <i>Forest managers have a demonstrated track record of complying with the monitoring protocols; and 8.2.2. Written records are kept of the annual or periodic harvest levels, at levels of specificity that reflect the scale and intensity of operations.</i> Through ALB caretakers and cooperation with the Forestry Bureau, ALB undertakes some monitoring activities- e.g., a network of permanent sample plots. However, there was insufficient record keeping needed to demonstrate the track record of monitoring.</p>	
<b>CAR 2009.17</b>	ALB must implement procedures for improved record keeping of monitoring activities, demonstrating how monitoring covers all requirements listed under Criterion 8.2.
<b>Deadline</b>	2010 Surveillance Audit
<b>Reference</b>	Indicator 8.1.2; 8.2.2

<p><b>Non-conformance:</b> ALB is not in conformance with Indicator: 8.2.5 <i>Information necessary to judge progress towards management objectives is collected and recorded. In all cases this will include:</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Amount of products harvested, by species</li> <li><input type="checkbox"/> Effects of operations as identified under Criteria 6.1</li> <li><input type="checkbox"/> Changes in features identified under Criteria 6.2</li> <li><input type="checkbox"/> Annual monitoring of high conservation values identified under Criteria 9.1</li> <li><input type="checkbox"/> Invasive exotic species</li> </ul> <p>ALB is not currently monitoring for conversion of natural forest to bamboo forest in each of the 15 villages- which could influence criterion 6.2 and 9.1.</p>	
<b>CAR 2009.18</b>	ALB must implement a program to monitor the composition and extent of natural forest within each of the 16 group villages.
<b>Deadline</b>	2010 Surveillance Audit
<b>Reference</b>	Indicator 8.2.5

<p><b>Non-conformance:</b> ALB is not in conformance with Indicators 8.5.1. <i>Interested stakeholders are readily able to obtain a public summary of the results of periodic</i></p>	
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<p><i>monitoring that addresses the indicators listed in Criterion 8.2; the results of periodic monitoring are summarized in a document released by the forest managers or incorporated into the annual certification audit report released by SCS.</i></p> <p>ALB has developed a public report for its water quality monitoring, however, the other monitoring requirements of 8.2 are not reported publically.</p>	
<b>CAR 2009.19</b>	ALB's public summary of monitoring results must be expanded to include all topics of 8.2.
<b>Deadline</b>	2010 Surveillance Audit
<b>Reference</b>	Indicator 8.5.1

<p><b>Non-conformance:</b> ALB is not in conformance with Indicator:  <i>9.1.3) Forest managers demonstrate a working understanding of the HCVF concept and definition and endeavour to comply with the spirit of this principle.</i></p> <p>ALB completed an HCVF assessment including consultation with experts (Forestry Bureau/villages), however, it seems that some possible areas may have been missed (e.g., Foziling Town- Gaoling village). The HCVF concepts are not fully understood by ALB. While there is no requirement that HCVF be designated if HCVF is not present, we conclude a more thorough analysis is warranted.</p>	
<b>CAR 2009.20</b>	ALB must review their HCVF analysis to ensure that all categories of HCVF have been duly covered.
<b>Deadline</b>	2010 Surveillance Audit
<b>Reference</b>	Criterion 9.1.3

Observations:

<b>Observation 2009.1</b>	ALB is encouraged to diversify the mix of bamboo, other commercial timber, and non-timber products (Observation 2009.1).
<b>Reference</b>	Indicator 5.2.2

<b>Observation 2009.2</b>	There is an opportunity for ALB to assist the villages to produce products from residual bamboo material. (Observation 2009.2)
<b>Reference</b>	Indicator 5.2.3

<b>Observation 2009.3</b>	The management plan should be expanded to better describe the regional landscape context, e.g., more information regarding bamboo forests, native secondary forests, land-use changes, etc.
<b>Reference</b>	Indicator 6.1.3

<b>Observation 2009.4</b>	ALB should implement more explicit guidelines for stream management zone protection and avoiding soil erosion.
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<b>Reference</b>	Indicator 6.5.1 and 6.5.2
<b>Observation 2009.5</b>	ALB should keep records of its safety equipment inspections.
<b>Reference</b>	Indicator 4.2.4

## 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 ALB to the FSC Interim Standard for Forest Management Certification in China (January 22, 2009). Public summaries of surveillance evaluations will be posted separately on the SCS website ([www.scsertified.com](http://www.scsertified.com)).

## 7.0 SUMMARY OF SCS COMPLAINT AND APPEAL INVESTIGATION PROCEDURES

The following is a summary of the SCS Complaint and Appeal Investigation Procedures, 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](mailto: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.

