

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

**Collins Group Certification Program**

**Conducted under auspices of the SCS Forest Conservation Program  
SCS is an FSC Accredited Certification Body**

**CERTIFICATION REGISTRATION NUMBER  
SCS-FM/COC- 00110G**

**Submitted to:**

**Collins Group Certification Program  
Collins Pine Company  
PO Box 1340  
Lakeview, OR 97630**

**Lead Author: Sterling Griffin**

**Date of Field Audit: 2/20/08**

**Date of Report: 6/15/08**

**Updated: February 2010 (See Section 6.1)**

**Certified: 7/24/2008**

**By:**

**SCIENTIFIC CERTIFICATION SYSTEMS  
2200 Powell St. Suite Number 725  
Emeryville, CA 94608, USA  
[www.scs-certified.com](http://www.scs-certified.com)**

**SCS Contact: Dave Wager [dwager@scs-certified.com](mailto:dwager@scs-certified.com)**

**Collins Contact: Lee Fledderjohann. [lfledderjohann@collinsco.com](mailto:lfledderjohann@collinsco.com)**

## **Organization of the Report**

This report of the results of our 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 evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the SCS website ([www.scscertified.com](http://www.scscertified.com)) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of the Collins Pine Company and has been removed from this public summary.

## **FOREWORD**

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by The Collins Group Certification Program to conduct a certification evaluation of its Group Certification Program. 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.

On February 20, 2008, a natural resource specialist was empanelled by SCS to conduct the evaluation. The auditor collected and analyzed written materials, conducted interviews and completed a one 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 auditor determined conformance to the 56 FSC Criteria in order to determine whether award of certification was warranted.

This report is issued in support of a recommendation to award FSC-endorsed certification to Collins Group Certification Program for the management of its group program. 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)).

Foreword.....	3
Section A- Public Summary and Background Information .....	6
1.0 GENERAL INFORMATION.....	6
1.1 FSC Data Request.....	6
1.2 Management Context.....	8
1.2.1 Environmental Context.....	8
1.2.2 Socioeconomic Context .....	8
1.3 Forest Management Enterprise .....	9
1.3.1 Land Use .....	9
1.3.2 Land Outside Scope of Certification.....	9
1.4 Management Plan.....	9
1.4.1 Management Objectives.....	9
The goal of the owners is to generate limited annual income consistent with conservative financial investments for current and future generations. Income will be generated from timberlands on a sustained basis through the production of saw logs and peeler logs as the principal crops.....	9
1.4.2 Forest Composition.....	9
1.4.3 Silvicultural Systems .....	9
1.4.4 Management Systems .....	9
1.4.5 Monitoring System.....	10
1.4.6 Estimate of Maximum Sustainable Yield .....	10
1.4.7 Estimated, Current and Projected Production.....	10
1.4.8 Chemical Pesticide Use.....	10
1.5 SLIMF Qualifications .....	10
2.0 Guidelines/Standards Employed.....	10
3.0 THE CERTIFICATION ASSESSMENT PROCESS.....	10
3.1 Assessment Dates.....	10
3.2 Assessment Team.....	10
3.3 Assessment Process .....	11
3.3.1 Itinerary.....	11
3.3.5 Stakeholder Consultation .....	11
3.4 Total Time Spent on audit.....	12
3.5 Process of Determining Conformance.....	12
4.0 Results of the Evaluation .....	13
Table 4.1 Notable strengths and weaknesses of the forest management enterprise relative to the P&C.....	13
4.2 Preconditions.....	16
5.0 Certification Decision .....	16
5.1 Certification Recommendation .....	16
6.0 Surveillance Evaluations.....	16
7.0 Summary of SCS Complaint and appeal Investigation Procedures.....	19
Section B Detailed Results of the Full Evaluation.....	20
1.0 Detailed Evaluation of Conformance.....	<b>Error! Bookmark not defined.</b>
2.0 TRACKING, TRACING AND IDENTIFICATION OF FOREST PRODUCTS	<b>Error! Bookmark not defined.</b>

2.1	Evaluation of Risks of Mixing Certified and Un-Certified Product .....	<b>Error!</b>
	<b>Bookmark not defined.</b>	
2.2	Description of the Log Control System .....	<b>Error! Bookmark not defined.</b>
2.3	End Point of Chain of Custody .....	<b>Error! Bookmark not defined.</b>
2.4	Visual Identification at End Point of Chain of Custody .....	<b>Error! Bookmark not defined.</b>
	<b>defined.</b>	
3.0	Group Management (Omit this section if not applicable) .....	<b>Error! Bookmark not defined.</b>
	<b>defined.</b>	
3.1	Division of Responsibilities.....	<b>Error! Bookmark not defined.</b>
3.2	Conformance with Group Management Criteria .....	<b>Error! Bookmark not defined.</b>
3.3	Group Sampling and surveillance.....	<b>Error! Bookmark not defined.</b>
3.5	Group Members .....	<b>Error! Bookmark not defined.</b>
3.6	Group Management Evaluation .....	<b>Error! Bookmark not defined.</b>

## SECTION A- PUBLIC SUMMARY AND BACKGROUND INFORMATION

### 1.0 GENERAL INFORMATION

#### 1.1 FSC Data Request

Applicant entity	Collins Group Certification Program
Contact person	Lee Fledderjohann
Address	P.O. Box 1340, Lakeview, Oregon 97630
Telephone	541-947-2018
Fax	541-947-2832
E-mail	<a href="mailto:lfledderjohann@collinsco.com">lfledderjohann@collinsco.com</a>
Certificate Number	SCS-FM/COC-00110G
Certificate/Expiration Date	7/24/2008-7/24/2013
Certificate Type	Group
SLIMF	Small SLIMF certificate
Group Members	1
Number of FMU's	1
Number of FMUs in scope that are less than 100 ha in area	
100 - 1000 ha in area	1
1000 - 10 000 ha in area	
more than 10 000 ha in area	
Location of certified forest area	
Latitude	42.83333N
Longitude	-120.50028W
Forest zone	Temperate
Total forest area in scope of certificate which is included in FMUs that:	
are less than 100 ha in area	
are between 100 ha and 1000 ha in area	718 ha
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	718 ha
Total forest area in scope of certificate which is:	
privately managed <sup>1</sup>	718 ha
state managed	
community managed <sup>2</sup>	
Number of forest workers (including contractors) working in forest within scope of certificate	6
Area of forest classified as 'high conservation value forest'	372 ac
Chemical pesticides used	none
Total area of production forest (i.e. forest from which timber may be harvested)	ha or ac
Area of production forest regenerated primarily by replanting <sup>3</sup>	0

<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.

<sup>3</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.

Area of production forest regenerated primarily by natural regeneration	718 ha
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	Pinus ponderosa, Abies concolor, Pinus contorta, Pinus monticola, Calocedrus decurrens
Approximate annual allowable cut (AAC) of commercial timber	403 mbf
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.)	Round wood, chips, biomass

## Conversion Table English Units to Metric Units

### Length Conversion Factors

<u>To convert from</u>	<u>to</u>	<u>multiply by</u>
mile (US Statute)	kilometer (km)	1.609347
foot (ft)	meter (m)	0.3048
yard (yd)	meter (m)	0.9144

### Area Conversion Factors

<u>To convert from</u>	<u>to</u>	<u>multiply by</u>
square foot (sq ft)	square meter (sq m)	0.09290304
acre (ac)	hectare (ha)	0.4047

### Volume Conversion Factors

#### Volume

<u>To convert from</u>	<u>to</u>	<u>multiply by</u>
cubic foot (cu ft)	cubic meter (cu m)	0.02831685
gallon (gal)	liter	4.546

1 acre = 0.404686 hectares

1,000 acres = 404.686 hectares

1 board foot = 0.00348 cubic meters

1,000 board feet = 3.48 cubic meters

1 cubic foot = 0.028317 cubic meters

1,000 cubic feet = 28.317 cubic meters

Breast height = 1.4 meters, or 4 1/2 feet, above ground level

Although 1,000 board feet is theoretically equivalent to 2.36 cubic meters, this is true only when a board foot is actually a piece of wood with a volume 1/12 of cubic foot. The conversion given here, 3.48 cubic meters, is based on the cubic volume of a log 16 feet long and 15 inches in diameter inside bark at the small end.

## **1.2 Management Context**

As the Forest in the Collins Group Certification Program is located in Oregon, management of the forests is subject to a host of local, state and federal regulations. The principal regulations of greatest relevance to forest managers in these regions are associated with the following statutes:

### ***Pertinent Regulations at the Federal Level:***

Endangered Species Act

Clean Water Act (Section 404 - wetland protection & Section 303d - impaired water bodies)

Occupational Safety and Health Act

National Historic Preservation Act

Archaeological and Historic Preservation Act

Americans with Disabilities Act

U.S. ratified treaties, including CITES

### ***Pertinent Regulations at State and Local Level:***

Natural Communities Conservation Planning Act

Oregon Forest Practices Act

### **1.2.1 Environmental Context**

The Forest is situated in south-central Oregon, on the periphery of the high desert of eastern Oregon and Nevada. While there are variations across the three tracts that comprise the Collins Lakeview Forest, the entirety can be characterized as occupied by the Eastside Pine vegetation type. This vegetation type is associated with a generally dry climate (approximately 16 inches of precipitation per year), very hot but short summers and cold winters. Most of the precipitation falls as snow. The subject property is generally of lower site productivity due to thin soils and limited precipitation.

### **1.2.2 Socioeconomic Context**

The region can be characterized as rural and socially conservative, with a strong orientation towards commodity natural resource utilization. Cattle ranching is a major component of both the economic and social framework of the region. Environmental activism is limited in the region. There are no active representatives of any national or regional environmental organizations residing within the Lakeview area. What environmental activism that does exist in the region is almost entirely focused on the management of the Fremont National Forest.

### **1.3 Forest Management Enterprise**

#### **1.3.1 Land Use**

Properties acquired by Mezger Forest Inc. (MFI) were part of a ranch operation and were subjected to varying degrees of grazing and other ranch and domestic uses including timber harvesting. Since acquisition, harvesting has occurred at least once on most parcels. Prescribed harvests were conservative and designed to leave ample growing stock for future growth and development.

#### **1.3.2 Land Outside Scope of Certification**

There are no forestlands owned by group members outside the scope of this assessment.

### **1.4 Management Plan**

#### **1.4.1 Management Objectives**

The goal of the owners is to generate limited annual income consistent with conservative financial investments for current and future generations. Income will be generated from timberlands on a sustained basis through the production of saw logs and peeler logs as the principal crops.

#### **1.4.2 Forest Composition**

The Continuous Forest Inventory (CFI) plots indicate that 60% of the total area is ponderosa pine type even though significant numbers of other species are represented. Twenty two per cent of the area is classified as mixed conifer and 6% lodgepole pine type. Understory vegetation include bitterbrush, Manzanita, ceonothus, chinquapin, ribes, rabbitbush, sagebrush, mahogany, willow, and serviceberry.

#### **1.4.3 Silvicultural Systems**

Individual tree selection, and to a limited extent group selection, shall be applied as the system of choice. The intent is to produce an uneven aged forest. An entry cycle of approximately 10 years will be utilized.

#### **1.4.4 Management Systems**

MFI ownership is subdivided into 4 blocks and 9 compartments for management purposes. These divisions accumulate 18 parcels into specific geographic areas that have some connectivity or commonality of operating conditions. The properties are managed by the owner acting as the property forester.

#### **1.4.5 Monitoring System**

The monitoring is conducted by continuous observation and a formal CFI system where plots are installed at the rate of one plot per ten acres of ownership. These plots (variable radius) are remeasured at five-year intervals providing current inventory data as well as changes that result from growth, harvest, mortality.

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

The annual allowable cut for the property within the group shall exceed growth during any five year period. The annual allowable cut is estimated to be 403 MBF.

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

The annual acres available for harvest is estimated to be 139 under a 10-year cutting cycle with growth estimated to be 291 bdft per acre.

#### **1.4.8 Chemical Pesticide Use**

There are no chemicals being used on the MFI property.

#### **1.5 SLIMF Qualifications**

The MFI meets the SLIMF qualifications by being less than 1,000 hectares in size.

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

As the applicant forest property is located in northern Idaho, the certification evaluation that is the subject of this report was conducted against the duly-endorsed FSC Pacific Coast Standard v9.0 (5/9/05). The standard is available at the FSC-US web site ([www.fscus.org](http://www.fscus.org)) or is available, upon request, from Scientific Certification Systems ([www.scscertified.com](http://www.scscertified.com)).

### **3.0 THE CERTIFICATION ASSESSMENT PROCESS**

#### **3.1 Assessment Dates**

The assessment occurred February 20, 2008.

#### **3.2 Assessment Team**

**Sterling Griffin, RPF #2805:** Sterling Griffin is a Senior Certification Forester with Scientific Certification Systems. He is a Registered Professional Forester in the State of California with 10 years professional experience in private and public forest management. He is a graduate of Purdue University with a B.S in Forestry and has conducted Forest

Stewardship Council (FSC) endorsed assessments on over 6 million acres of forestland in North and South America. Recent FSC assessments have included public lands administered by Fort Lewis, WA Forestry Branch, Michigan DNR, Indiana DOF, New York DEC, Maryland DNR and numerous private operations in Maine, Pennsylvania, Oregon, Washington, and California. Prior to joining SCS, he was the founder of a private consulting firm in Northern California specializing in sustained yield management, fuels reduction, and forest health management. His professional career also includes silvicultural and ecosystem research for the U.S. Forest Service. Areas of research activities include stand level response to vegetative competition and Long-Term Ecosystem Productivity (LTEP) in the Pacific Northwest.

### **3.3 Assessment Process**

#### **3.3.1 Itinerary**

The assessment field visit including an opening meeting with the Collins Group Managers and the group forestland owner. The meeting involved review of the group management guidelines, property documentation, and a field visit to view harvest operations.

#### **3.3.5 Stakeholder Consultation**

Pursuant to SCS protocols, consultations with key stakeholders was a part of the evaluation process. SCS solicited input from affected parties as to the strengths and weaknesses of MFI, relative to the standard, and the nature of the interaction between the company and the surrounding communities.

Over the 10 years that the group entity has been FSC certified, SCS has received very little comment from stakeholders about their operations. The comments that have been received have all been positive. The following types of groups and individuals were determined to be principal stakeholders:

- Local Tribal members and or representatives
- Members of the FSC Pacific Coast Working Group/National Initiative
- Local and regionally based environmental organizations and conservationists
- Local, State and Federal regulatory agency personnel

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

Stakeholder comments were positive and did not suggest any areas of possible non-conformance that would require further investigation.

### **3.4 Total Time Spent on audit**

The auditor spent one day preparing for the audit, one day on-site, one day reviewing newly submitted documents, and two days writing the assessment report. A total of 5 auditor days was spent on the assessment.

### **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 judgement 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.

*Recommendations:* These are suggestions that the audit team concludes would help the company move even further towards exemplary status. Action on the recommendations is voluntary and does not affect the maintenance of the certificate. Recommendations can be changed to CARs if performance with respect to the criterion triggering the recommendation falls into non-conformance.

## **4.0 RESULTS OF THE EVALUATION**

Table 4.1 below, contains the evaluation team'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/REC #s
<b>P1: FSC Commitment and Legal Compliance</b>	<ul style="list-style-type: none"> <li>▪ The group entity and member have a long-term demonstrated commitment to the FSC</li> <li>▪ There have been no issues with legal compliance</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted</li> </ul>	
<b>P2: Tenure &amp; Use Rights &amp; Responsibilities</b>	<ul style="list-style-type: none"> <li>▪ There is clear evidence of legal land ownership</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted</li> </ul>	
<b>P3: Indigenous Peoples' Rights</b>	<ul style="list-style-type: none"> <li>▪ The landowner active solicits input from affected stakeholders</li> </ul>	<ul style="list-style-type: none"> <li>▪ There could be improvements made to increase outreach to affected stakeholders</li> </ul>	See REC 2007.1
<b>P4: Community Relations &amp; Workers' Rights</b>	<ul style="list-style-type: none"> <li>▪ Contractors are well paid and owners have good working relationships with the community</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted</li> </ul>	
<b>P5: Benefits from the Forest</b>	<ul style="list-style-type: none"> <li>▪ The owners attempt to diversify whenever possible</li> <li>▪ Allowable cut is well justified</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted</li> </ul>	
<b>P6: Environmental Impact</b>	<ul style="list-style-type: none"> <li>▪ The management plan and notification process ensure good impact assessment</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted</li> </ul>	

<b>P7: Management Plan</b>	<ul style="list-style-type: none"> <li>▪ There is a well written comprehensive management plan</li> </ul>	<ul style="list-style-type: none"> <li>▪ None Noted</li> </ul>	
<b>P8: Monitoring &amp; Assessment</b>	<ul style="list-style-type: none"> <li>▪ The owner maintains a complete CFI system and conducts extensive informal monitoring</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted</li> </ul>	
<b>P9: Maintenance of High Conservation Value Forest</b>	<ul style="list-style-type: none"> <li>▪ A large portion (20%) of the property has been identified as HCVF</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted</li> </ul>	

## 4.2 Preconditions

No preconditions were placed on the Collins Group Certification Program during the initial evaluation.

## 4.3 Recommendations

**REC 2007.1** MFI should improve efforts to contact stakeholders regarding management planning. The affected stakeholder groups should include regional conservation groups, Native Americans, local industrial operations, and public agencies.

## 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 Collins Group Certification Program be awarded FSC certification as a “Well-Managed Forest” subject to the corrective action requests stated in Section 5.2. The Collins Group Program has demonstrated that their system of management is capable of ensuring that all of the requirements of the FSC Pacific Coast Standard are met over the forest area covered by the scope of the evaluation. The Collins Group has also demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.

## 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 the Collins Group Certification Program to the FSC Pacific Coast Standard. Public summaries of surveillance evaluations will be posted separately on the SCS website ([www.scscertified.com](http://www.scscertified.com)).

### 6.1.0 2009 ANNUAL AUDIT

#### 6.1.1 Assessment Dates

A total of 1.5 auditor days were spent on this annual audit, including field visits, interviews with stakeholders and document review.

#### 6.1.2 Assessment Personnel

**Kyle Meister, M.F. – Lead auditor, Scientific Certification Systems.** Mr. Meister is a Certification Forester with Scientific Certification Systems. Recent FSC FM audits include True North Certified Forestland Network, St. John’s Abbey, Collins Kane Hardwood Division, Main International, Humboldt Redwood Company, Cikel Brasil Verde – Rio Capim, Mendocino Redwood Company’s Resource Manager Program, and Trout Mountain

Forestry. He holds a B.S. in Natural Resource Ecology and Management and a B.A. in Spanish from the University of Michigan. He also has a Master of Forestry degree from the Yale School of Forestry and Environmental Studies. He has experience as an environmental educator and natural resource consultant in the U.S., Mexico, Ecuador, Costa Rica, Colombia, and Brazil.

**6.1.3 Assessment Process**

The scope of the 2009 annual audit, as with all annual audits, included the following activities: document review, field and office visits, and interviews with management personnel and, as appropriate, outside stakeholders.

CGCP personnel present for the annual audit included Travis Erickson, RPF. Lee Fledderjohann provided supporting documentation. The field portion of the audit focused on the Mezger Forest Inc. (MFI) Property, which has not undergone harvesting since before becoming a part of CGCP.

**November 19, 2009**

- Opening meeting at CGCP offices (8:00 am)
  - Review of open recommendation
  - Finalization of field itinerary
- Site visits (9:30 am – 3:30 pm)
  - Mezger Tree Farm
    - No harvesting for 2007-2009
    - Insect mortality – lots of coarse woody debris
    - Have discussed silviculture with landowner – reduce basal area to achieve regeneration, reduce insect populations
    - Thomas Creek – Fish-bearing stream and intermittent stream complex, legacy road by portion of stream, fence in need of repair.
    - Forest inventory included in pre-sale data for timber harvests

**November 20, 2009**

- Review of CGCP’s efforts in outreach to Indigenous Peoples
- Calls to stakeholders
  - Indigenous Peoples
- Summary of findings, issuance of OBSs, and closing meeting

**6.1.4 Status of Corrective Action Requests**

There were no open corrective action requests at the time of the 2009 annual audit.

**Status of Recommendations**

<b>Background/Justification:</b> Although Collins Lakeview Forest staff have contacted tribal representatives in recent years, MFI has not.	
<b>REC 2008.1</b>	MFI should improve efforts to contact stakeholders regarding

	management planning. The affected stakeholder groups should include regional conservation groups, Native Americans, local industrial operations, and public agencies.
<b>Reference</b>	<i>FSC Indicators 3.2.a and 3.3.a.</i>
<b>CGCP response</b>	On April 15, 2009, MFI sent a letter to regional representatives of the Klamath Tribe as its forest parcels were formerly of the Klamath Reservation Allotments. MFI has yet to receive a response. CGCP has included a copy of this letter in the Group Certification Report for 2009.
<b>Disposition of REC</b>	This <b>REC is closed.</b>

### 6.1.5 General Observations

The stagnation of growth in CGCP and the lack of harvests during the past year are a reflection of poor timber markets. This is an additional expense to CLF that, although it has potential to provide social benefits regionally, has yet to produce a financial return on investment. However, there may be opportunities in the long-term for the group certification program if regional markets for FSC-certified wood products grow. As such, CGCP should consider the short- and long-term financial objectives of its group certification program to determine its value as a continued investment for the Collins Companies.

### 6.1.6 New Corrective Action Requests and Observations

<b>Nonconformity:</b> Under CGCP’s group management manual section titled, “Program Operation: Responsibilities,” it is not clear who has access to group member properties and records.	
<b>CAR 2009.1</b>	CGCP shall provide an explanation of the rights of access to group member properties and records by CGCP, the certification body, and the FSC.
<b>Deadline</b>	2010 Annual Audit
<b>Reference</b>	SCS Group Certification Standards 3.a.iii

<b>Nonconformity:</b> CGCP’s group management manual does not provide an explanation of the certification body’s and FSC’s requirements with respect to public information.	
<b>CAR 2009.2</b>	CGCP shall provide an explanation of the public information that it and the certification body are required to provide under the applicable FSC US regional standard and FSC regulations (e.g., public summaries).
<b>Deadline</b>	2010 Annual Audit
<b>Reference</b>	SCS Group Certification Standards 3.a.iv

<b>Nonconformity:</b> CGCP issues sub-licenses for use of the FSC Logo and other FSC Trademarks. CGCP’s chain-of-custody procedure includes a section on the group entity, CGCP, issuing an “Operational FSC Group Certificate” upon the landowner’s approval for	
---	--

inclusion in the program. This is not permitted under the group certification standard.	
<b>CAR 2009.3</b>	CGCP shall cease issuing the “Operational FSC Group Certificate” or any other document that could be taken as a sub-license for use of the FSC Logo and other FSC Trademarks.  Should any such document be in the current possession of group members, CGCP shall instruct them to destroy it immediately or return it to CLF for disposal.
<b>Deadline</b>	2010 Annual Audit
<b>Reference</b>	SCS Group Certification Standards 5.b.

**Observations**

<b>Background/Justification:</b> The fence on the MFI is in disrepair. Although SCS detected no cattle grazing on the property, the landowner does not live onsite to monitor the effects of potential unpermitted cattle grazing.	
<b>OBS 2009.1</b>	MFI should consider repairing sections of fence line when financially feasible to reduce the risk of unauthorized cattle grazing to better protect forage and water resources on the property.
<b>Reference</b>	<i>FSC Indicators 1.5.a. and 6.5.t.</i>

**6.1.7 General Conclusions of the Annual Audit**

Based upon information gathered through site visits, interviews, and document reviews, the SCS audit team concludes that CGCP’s management of its group certification program in Lakeview, OR continues to be in overall compliance with the FSC Principles and Criteria, as elaborated by the FSC US Pacific Coast Regional Guidelines. The SCS audit team has concluded from this annual audit that CGCP’s forest management program is in general conformance with FSC Principles 1 through 9 (Principle 10 is not applicable as CGCP’s operations are classified as “natural forest management” under the FSC definitions). As such, continuation of the certification is warranted, subject to subsequent annual audits.

**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.