

Executive Summary:

Field Test of Draft NZ FSC Standard

The most recent version of the draft New Zealand FSC Standard was field tested on 19 and 20 August 2010. This task was carried out at the office of Pan Pac Forest Products Ltd by means of a desk top evaluation after the completion of a routine surveillance visit. Each Indicator of the draft Standard was considered through a detailed assessment of each, in terms of its relationship to the Criterion, its “auditability” and then whether and how Pan Pac would have complied. The Indicators are graded in this Report like traffic lights -Green for OK, Orange (muddy yellow) for needing some work, and Red for needing a lot of work. Pan Pac compliance is recorded in accordance with their Public Summary report.

The draft Standard has a New Zealand focus with a particular emphasis on Principle 3. A number of the FSC generic Indicators in other Principles are no longer needed.

There has been progress on the question of natural forest reserves, and a great deal of work has been put into Principle 6.4 and 10.5. However, the detailed field test finds that, in their current form, they are difficult to audit against.

General Comments

Re-writing the Draft Indicators was not part of this brief. That will be one of the next tasks and is something for a skilled standards writer.

It is apparent that the draft mixes the intent of the three main descriptors that are used to identify whether a Criterion has been complied with, and so some confusion is evident in a number of areas. The SGS Qualifor generic standard, approved by FSC, provides these definitions:

Indicators – outline the norm required for compliance with the specific FSC Criterion.

Verifiers – are examples of what an assessor may look for to ascertain if a specific norm has been met. The list is not meant to be exhaustive and the assessor may use other means of verifying the Indicator.

Guidance – Assists the assessor in understanding the requirements of the specific Indicator.

The field test comments against each draft Indicator attempt to bear these definitions in mind.

The FSC requirement is that each Indicator, and each verifier within an Indicator, must be reported against at least twice during the certificate period. The wording of the Indicator must be unambiguous as International reviewers will be checking each Report. The number of verifiers must find the balance between proving the Criterion is complied with and writing a lengthy report after each assessment visit.

It is also apparent that there needs to be consistency in the use of the term “Forest Management Unit” (FMU). Does this also mean Management Unit, Certificate Holder, enterprise?

Where necessary, I have made comment in various Criteria that a logical audit “process” be followed to enable the SDG, the Assessor and the Client to build up a picture of what is being assessed and how. This process should include: identification; evaluation or assessment; addressing relevant issues; notification or consulting. This process enables a thorough look at each Criterion. Some changes along these lines have been suggested in a number of areas in the Report.

There is also the occasional use of the word “active” in the Draft, without adequate definition. Such terms can be interpreted differently by different assessors.

Specific Comments

Criterion 1.3 – Respect for International Agreements. Is this a company by company issue, or is there a national position that can be verified by the relevant Government Departments? Indicator 4.3.1 does this to some extent.

Criterion 3.1 – There are various models of control in New Zealand at present. The SDG could provide guidelines for compliance with Crown Forest Licences, the Settlement Deeds, and Maori land leases.

Criterion 3.2 – the SDG needs to provide guidance on precisely what it means in the draft Indicators.

Criterion 3.3 – this is the logical place to include all historic sites (Historic Places Act), if that is the SDG wish.

Principle 4 – The SDG needs to consider what goes into a Standard. Do you wish to present what is already in legislation or regulation? Or simply seek to ensure compliance with the relevant legislation? The role of Guidance notes is important here.

Criterion 6.1 – The draft Standard does not appear to detail sufficient Indicators to ensure compliance with the Criterion. The New Zealand Indicator on sportfish and gamebirds is not appropriate in this Indicator, and other locations are suggested.

Criteria 6.4 and 10.5 – caused a number of problems from an audit perspective. Pan Pac currently complies with the SGS NZ Plantations standard as it has over 10% of its estate as reserves and has management plans in place for those. However, the company does not comply with this Draft NZ Standard Criterion 10.5, as not all of its forests meet the new reserve requirements. Specifically the small area of forest in the Waihua Ecological District has 3.3% of its area in reserves. Note that pre-1987 the figure would have been 11.5%. Adjustments according to the formulae raise this figure to 4.1% or 7.1%, still below the 10% threshold. The company has provided a spreadsheet to show just how the various contributions to the reserve percentages have been calculated. Under the proposed Criterion, the company would have time to ensure compliance in future, but the SDG needs to consider several issues:

- a) Non-compliance at a Criterion level requires the issue of a Major CAR. These need to be addressed within a specified timeframe which is shorter than indicated by the draft standard (see 10.5.2). The standard would require re-wording to ensure the intent was met.
- b) There are various forms of off-site conservation (restoration or species management) projects inferred in the Draft Standard. Currently Pan Pac contributes to Conservation Week, it sponsors a Kiwi Crèche, it supports the local Forest and Bird branch activities (eg Blowhard bush), and a number of other conservation and restoration projects. Just how these would be assessed and ranked would need to be set out very clearly to avoid uncertainty.

Criterion 6.6 – A re-ordering of Indicators is suggested to create a logical flow through the Criterion.

Criterion 6.10 – Has re-stated the Forest Accord in the Indicator. Is that the wish of the SDG?

Principle 7 – Several of the Indicators throughout the Principle need to be refined to ensure the intent is clear and the words make sense from an audit perspective. The flow of Indicators needs to be improved to allow easier reference to each Criterion

Criterion 8.3 – Reference to complying with the FSC Trademark Agreement needs to be in here.

Criteria 9.3 and 9.4 – Indicators are available from other generic standards.

Principle 10 – A great deal of work has gone into the draft. However, the audit comments suggest that more needs to be done to bring to an auditable level. There are questions of addressing the written Criterion through the Indicators, adequate definitions, and the complexity of Criterion 10.5.

I would like to commend the SDG on the progress made on this Project to date. A clear New Zealand focus is appearing and the comments raised should assist the Group in ensuring that the final product meets FSC, auditor and client requirements.

If you require further explanation of the more detailed assessment comments please do not hesitate to contact me.

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SGS Qualifor

Report on Field Test of Draft NZ Standard

Principle 1: Compliance with Laws and FSC Principles

Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria

Current Wording	Audit comments
<p>Criterion 1.1: Forest management shall respect all national & local laws and administrative requirements</p>	
<p>Indicator 1.1.1 L</p> <p>There is an up-to-date register or summary of all relevant national and local statutes and regulations. Relevant public Acts include (see http://www.legislation.govt.nz/ for copies of the legislation):</p> <ul style="list-style-type: none"> • Resource Management Act 1991 • Historic Places Act 1993 • Conservation Act 1987 • Biosecurity Act 1993 • Forest and Rural Fires Act 1977 • Hazardous Substances and New Organisms Act 1996 • Health & Safety in Employment Act 1992 • Wildlife Act 1953 • Forests Act 1949 • Employment Relations Act 2000 • Treaty of Waitangi Act 1975 • Fencing Act 1978 • Wild Animal Control Act 1977 • Trespass Act 1980 	<p>From an audit point of view, it is better to ensure that an enterprise has the ability to check up to date references rather than audit what may be older copies of legislation. I recommend that this Indicator be removed.</p> <p>This list is not appropriate to include in an Indicator. I recommend that this list be transferred to an Appendix on the basis that it may be modified at some stage in the life of this Standard.</p>

Current Wording	Audit comments
<ul style="list-style-type: none"> • Crown Forest Assets Act 1989 • Soil Conservation and Rivers Control Act 1941 • Accident Compensation Act 2001 • Climate Change Response Act 2002 • Commerce Act 1986 • Companies Act 1993 • Conservation Law Reform Act 1987 • Co-operative Companies Act 1996 • Crown Minerals Act 1991 • Foreshore and Seabed Act 2004 • Forestry Encouragement Act 1962 • Forestry Rights Registration Act 1983 • Holidays Act 2003 • Income Tax Act 2007 • Injury Prevention, Rehabilitation, and Compensation Act 2001 • Land Act 1948 • Land Transfer Act 1952 • Local Government Act 2002 • Machinery Act 1950 • Maori Reserved Land Act 1955 • Minimum Wage Act 1983 • Misuse of Drugs Act 1975 • Native Plants Protection Act 1934 • Overseas Investment Act 2005 • Personal Property Securities Act 1999 • Plant Variety Rights Act 1987 • Public Works Act 1981 • Sale of Goods Act 1908 • Te Turi Whenua Maori Act 1993/Maori Land Act 1993 • Trade Marks Act 2002 • Transport Act 1962 • Walking Access Act 2008 <p data-bbox="188 1166 1066 1289"><i>[Note that there may be some legislation that applies to specific situations. For example some of the Treaty Settlement legislation has provisions that affect particular pieces of land (The Ngati Awa Claims Settlement Act 2005 has provisions relating to access over the forest land included in the settlement)]</i></p>	

Current Wording	Audit comments
<p>Indicator 1.1.2</p> <p>There is a system for ensuring all summaries or reference copies of legislation and regulations are up to date</p> <p>Verifier</p> <p>Compliance with this standard can be achieved by maintaining the capacity to view relevant legislation and a capacity to ensure that the certificate holder is aware of changes to legislation.</p>	<p>I recommend that this is a more appropriate Indicator to replace 1.1.1, with the list of legislation referred to as an Appendix, and the web site included..</p> <p>Add to the verifier a subscription to a legislation review organisation.</p>
<p>Indicator 1.1.3</p> <p>Employees and contractors are aware of the implications of relevant regulations and statutes</p> <p>Verifier</p> <p>The certificate holder interprets obligations of district and regional plans, and regional pest management strategies and incorporates those into the operational requirements <i>of the enterprise</i>.</p>	<p>This indicator is very broad and difficult to audit in its current form. I recommend its removal and replacement with the current 1.1.4.</p> <p>I recommend that this modified Verifier becomes the new (b) in 1.1.4.</p>
<p>Indicator 1.1.4</p> <p>Relevant statutes and regulations are implemented through operational guidelines and procedures</p> <p>Verifiers</p> <p>a) There is a system for checking if a resource consent is required, obtaining consents, and communicating local authority rules and consent conditions to an operational level</p> <p>b) There is a system for checking if historic sites are present and applying for Historic Places Authority if necessary</p>	<p>This is relevant to Small Forests.</p>

Current Wording	Audit comments
<p>Indicator 1.1.5 Where non-compliances are identified corrective actions are implemented</p> <p>Verifiers</p> <ul style="list-style-type: none"> a) There is a system for monitoring compliance with performance standards in local authority consents and rules b) There is a system for recording visit and correspondence from local authority officials and responding to issues raised c) There is a system for remedial action in the event of non-compliance 	<p>This relates to legal non-compliances, and recording the evidence of any remedial action.</p>
<p>Indicator 1.1.6 The enterprise shall be legally registered in accordance with applicable requirements, and has copies of all the documentation required for such registration</p>	<p>This Indicator becomes superfluous if the current 1.1.4 and 1.1.5 remain in place.</p>
<p>Results for Pan Pac: Management of forests follows national legislative and local regulatory requirements. No violations of laws were identified.</p>	
<p>Criterion 1.2: All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid</p>	
<p>Indicator 1.2.1 Verifiable records shall show that the enterprise is up-to-date with the payment of all required fees, royalties, taxes and other charges (including any fines). There is evidence that required payments have been</p>	<p>The first sentence really describes the Criterion. I recommend that the second sentence forms the Indicator.</p>

Current Wording	Audit comments
made.	
<p>Results for Pan Pac: Documentation indicates that legally required fees, taxes and regional rates are paid. Budget provision is made for future payment of fees.</p>	
<p>Criterion 1.3: In signatory countries, the provisions of all the binding international agreements such as CITES, ILO conventions, ITTA, and Convention on Biological Diversity, shall be respected</p>	
<p>Indicator 1.3.1 All statutory requirements shall be met or exceeded</p>	<p>This is difficult to audit against; ALL statutory requirements have been addressed in 1.1. This standard is for Plantation forests in the temperate zone so ITTA conventions may not be relevant. Further, it appears that the NZ Government has signed these international Agreements on behalf of all New Zealanders and companies expect that the provisions are in relevant legislation. I recommend that the SDG obtain letters from the Department of Labour regarding NZ's legislation against the ILO conventions, and Department of Conservation regarding the CBD, to confirm that the provisions are included in NZ laws so that Certificate Holders' compliance with 1.1 confirms compliance with this indicator.</p>
<p>Indicator 1.3.2 L The forest management enterprise shall have a list of all locally occurring species that are listed by CITES</p>	<p>Add a Verifier indicating knowledge of the CITES process.</p>
<p>Results for Pan Pac: International agreements are controlled by NZ Government Departments – (Conservation and Forestry). No conflicts exist. Supervisors and</p>	

Current Wording	Audit comments
contractors are aware of the Agreements.	
<p>Criterion 1.4: Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.</p>	
<p>Indicator 1.4.1 The enterprise shall identify and document any situations in which the manager's compliance with the law would preclude compliance with any indicator of this standard, or vice versa</p> <p>Verifier (a) Any identified conflicts are documented. Steps are taken to resolve conflict and any strategy devised for immediate and long-term compliance with FSC requirements are documented.</p>	<p>Any identified conflicts are brought to the attention of the National Initiative (when formed) or the enterprise's Certifying Body.</p>
<p>Results for Pan Pac: Managers and stakeholders interviewed are not aware of any conflicts.</p>	
<p>Criterion 1.5: Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</p>	
<p>Indicator 1.5.1 Unauthorised and illegal activities are identified and appropriate responses made</p> <p>Verifier a) With respect to illegal activities, certificate holders shall provide</p>	

Current Wording	Audit comments
appropriate assistance to the police consistent with legal obligations and the safety of personnel and the public	
<p>Indicator 1.5.2 L Managers shall have documented policies and procedures to protect the forest from illegal activities.</p>	This is a new provision. Unsure what it can add to 1.5.1
<p>Results for Pan Pac: Four Forest Coordinators live on or near their forests. Good relationships with neighbours and contractors allow for any illegal activities noted to be reported to police. No unauthorised logging or settlement was reported or noted during field visits.</p>	
<p>Criterion 1.6: Forest managers (certificate holders) shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria</p>	
<p>Indicator 1.6.1 There is a publicly available policy endorsed by the most senior management stating commitment to forest management practices consistent with the National Plantation Standard</p> <p>Verifier “Available” means evidence that it is available for inspection during normal office hours at the certificate holder’s principal office; or on an internationally accessible website</p> <p>Indicator 1.6.1 S The forest manager manages the forest in the long term in a way that is compatible with the FSC Principles and Criteria, including a written commitment within the management plan.</p>	Recommend that this is moved to definitions

Current Wording	Audit comments
<p>Indicator 1.6.2 The area subject to certification is explicitly defined and there are measures in place which clearly segregate timber products from the area.</p>	
<p>Indicator 1.6.3 L The policy is communicated throughout the organisation and to contractors.</p>	
<p>Indicator 1.6.4 L The policy is reviewed and updated in conjunction with a review process</p>	<p>This is not clear from an audit point of view. The policy is stated or it is not. If it is not stated there is non-compliance with 1.6.1. I recommend this Indicator be removed.</p>
<p>Indicator 1.6.5 The certificate holder must fully disclose all plantation forest areas over which they have some responsibility</p>	<p>Recommend adding “and demonstrate a long term commitment to managing all forests in the spirit of this Standard”.</p>
<p>Indicator 1.6.7 Any of the plantation forest areas over which the certificate holder has some responsibility and are not being certified, must have no “major conflicts” with the standards for FSC Controlled Wood (FSC-STANDARD-30-010)</p>	<p>OK</p>
<p>Results for Pan Pac: A long term commitment to FSC has been publicly stated and documented in Company newsletters. Stakeholders and Contractors interviewed expressed their awareness of Company commitment to FSC and its implications.</p>	

Principle 2: Tenure and Use Rights and Responsibilities

Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.

Current Wording	Audit comments
<p>Criterion 2.1: Clear evidence of long-term tenure and forest use rights to the land (e.g. land title, customary rights, or lease agreements) shall be demonstrated.</p>	
<p>Indicator 2.1.1 Documents are present describing the legal status of the management unit.</p> <p>Guidance Note These may include:</p> <ul style="list-style-type: none"> • Land certificates & title • Registered rights such as leases or rights of way • Unregistered leases or licenses to occupy • Crown Forestry Licences • Forestry Rights • Crown Leases • Give and take boundary agreements 	<p>Ensure there is consistency between “Management Unit” and “Forest Management Unit”.</p>
<p>Indicator 2.1.2 Maps shall record important tenure / land use information including</p>	

Current Wording	Audit comments
boundaries and identifiable public access routes.	
<p>Indicator 2.1.3 The certificate holder is able to access documentation indicating the existence of any Treaty of Waitangi Claims over the land</p>	
<p>Results for Pan Pac: Documentation shows the company has Crown Forest Licences, and freehold title to some of its forest lands.</p>	
<p>Criterion 2.2: Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</p>	
<p>Indicator 2.2.1 Local communities or other stakeholders, who have recognised legal or customary tenure, access or use rights have been identified</p>	<p>Do you wish to define “long” in the context of claimed European customary use rights, eg recreation access, pig hunting etc.</p>
<p>Indicator 2.2.2 The forest manager will make all reasonable efforts to make stakeholders with recognised use rights aware of current and proposed forest operations that may affect their use rights</p>	
<p>Indicator 2.2.3 There is evidence that free and informed consent to forest operations affecting use rights has been given by affected parties provided that any withholding of consent is neither vexatious nor frivolous</p>	<p>Recommend inserting “recognised” use rights as in 2.2.2. There are a number of instances where previously unrecognised use “rights” have become apparent.</p>

Current Wording	Audit comments
<p>Indicator 2.2.4 There is a process for consulting with all easement rights holders about planned forest operations that might affect their activities</p>	
<p>Results for Pan Pac: Information on legal rights of way and informal water takes are recorded on forest plans and linked to the company's GIS. Legal rights of way are recorded on titles.</p> <p>The company undertook extensive measures to address local concerns and replanted a previously forested area in native bush to enhance a camping ground, and constructed a walkway through redwood stands to enhance recreational opportunities.</p> <p>SA 2009: The company has installed enhanced water supply arrangements for some neighbours despite there being no prior legal agreement for these neighbours to extract water from the forests.</p>	
<p>Criterion 2.3: Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p>	
<p>Indicator 2.3.1 A written record of previous and on-going disputes over tenure, access (where controlled by certificate holder) and use rights will be kept</p>	
<p>Indicator 2.3.2 Appropriate mechanisms are employed to resolve disputes, including</p>	

Current Wording	Audit comments
legal requirements and internal procedures.	This could be placed as 2.3.1.
<p>Indicator 2.3.3</p> <p>There is a commitment to resolution of on-going disputes where the disputes are not vexatious or frivolous</p>	<p>This is difficult to audit against as it requires an assessment of “commitment”.</p> <p>Do you mean that there should be no disputes of a substantial magnitude and involving a significant number of interests?</p>
<p>Indicator 2.3.4 L</p> <p>Where there is potential for dispute over tenure or use rights relating to land and forest resources the enterprise shall have a written procedure to resolve such disputes, and has allocated sufficient staff and resources for effective implementation.</p>	<p>This could be superfluous if the words “including sufficient staff and resources” are inserted after “mechanisms” in 2.3.2.</p>
<p>Results for Pan Pac: No unresolved tenure or use rights disputes were reported or identified.</p>	

Principle 3: Indigenous Peoples' Rights

The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.

Current Wording	Audit comments
Criterion 3.1: Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies	
<p>Indicator 3.1.1 The manager shall identify tāngata whenua, landowners or the representative entities of lands on which the forest management unit is located.</p> <p>Verifier Forest managers shall maintain an up to date list of the representative tāngata whenua, land owner entities, and their representatives including their contact details.</p>	<p>Need to be consistent with terms – manager & forest manager – are they the same?</p> <p>This is straight forward to audit against.</p>
<p>Indicator 3.1.2 The manager shall consult with the tangata whenua landowners and record and provide for all “tino rangatiratanga” requirements affecting their lands.</p> <p>Verifiers a) Forest managers shall hold a written authority verifying the mandate of</p>	<p>I have a concern about the number of verifiers that need to be audited and reported against in this particular Indicator. The verifiers are loose and have the potential to involve auditors in time-consuming detail, especially checking mandates.</p>

Current Wording	Audit comments
<p>tangata whenua land owner representatives to manage their land for forest use.</p> <p>b) Forest managers shall obtain the landowners written consent prior to the commencement of forestry operations on their land.</p> <p>c) Forest managers shall maintain a written record confirming prior consultation with tangata whenua landowners and agreements for the delegation of control to the forest manager in accordance with the principles of free, informed and written consent</p> <p>d) Forest managers shall maintain a written record of agreements for access, specific activities and arrangements negotiated with the tangata whenua landowners, in relation to identified areas, resources, taonga and sites (refer below to attached reference to tino rangatiratanga).</p> <p>e) All forest managers' records in c) and d) (above) shall be made available to the tangata whenua landowners or their representative entities.</p>	<p>There needs to be some guidance about what a “written authority” might be: is it a Crown Forest Licence, a Settlement Deed, or long term lease? The guidance might list exclusions.</p> <p>Does the lease imply written consent, or does this mean written consent for each and every forestry operation? How long should each consent last?</p> <p>Does this apply to CFL’s and long term leases?</p> <p>Does this mean access permits?</p> <p>Extensive guidance is needed to auditors to make this an auditable Indicator.</p>
<p>Indicator 3.1.3</p> <p>Customary/traditional rights requested by tāngata whenua landowners to own, manage or use forest resources (timber and non-timber) shall be identified and facilitated.</p> <p>Verifiers</p> <p>a) Forest managers shall engage in consultations with tangata whenua landowners, in respect of requests made by them for access to, and for the use of the forest management area, for their customary and traditional purposes.</p> <p>b) Forest managers shall maintain a written record of all requests and agreements for traditional and customary use and access. Such</p>	<p>How is this different from 3.1.2?</p> <p>If they wish to own, manage and use the timber resources, should the tangata whenua apply for and hold the Certificate?</p> <p>Do permits constitute acceptance of requests</p> <p>How to audit “active support” as opposed to “support”.</p> <p>More guidance is needed.</p>

Current Wording	Audit comments
<p>engagements and agreements shall be minuted as to date and signed by parties.</p> <p>c) Forest managers shall commit to the active support and implementation of agreements and maintain an incidence report of these activities.</p>	
<p>Indicator 3.1.4</p> <p>A record must be maintained of all previous and on-going disputes over customary/traditional rights of tangata whenua.</p> <p>Verifier</p> <p>Forest managers shall maintain a written record of all previous and on-going disputes relating to the customary/traditional rights of tangata whenua affecting the lands under forest management.</p>	<p>Guidance is required on how a forest manager may acquire records of all previous disputes?</p>
<p>Indicator 3.1.5</p> <p>Appropriate mechanisms are employed to resolve disputes, including the adoption and use of customary and traditional protocols and institutions, legal requirements and internal procedures.</p> <p>Verifiers</p> <p>a) When a dispute arises forest managers shall engage with the mandated representatives of the tangata whenua landowners or their appointees to discuss and attempt to reach agreement on:</p> <ul style="list-style-type: none"> i) identifying the issues in dispute ii) review of affected areas of forest operations 	<p>This is difficult to audit against. Guidance is required for auditors.</p> <p>This verifier is written as an instruction.</p>

Current Wording	Audit comments
<p>iii) identifying the process for dispute resolution including hui</p> <p>b) Forest managers holds records of discussions, agreed actions, and responsibility for implementation of actions.</p>	
<p>Indicator 3.1.6 There is a commitment to implement all agreements and legally verified third party directions to the dispute resolution</p> <p>Verifier Forest managers shall implement all agreements and directions arising from the conflict resolution process in a timely manner</p>	<p>This is difficult to audit against. Guidance is required for auditors.</p> <p>This verifier is written as an instruction.</p>
<p>Indicator 3.1.7 There is a commitment to resolving on-going disputes in a fair and equitable manner where the disputes are deemed not to be vexatious or frivolous</p> <p>Verifier a) Forest managers shall demonstrate principles of transparency and fairness (other?) when engaging with tangata whenua in dispute resolution</p>	<p>What is the difference between this & 3.1.6? Could they be combined?</p>
<p>Results for Pan Pac: Pan Pac is pro-active in maintaining relationships with tangata Whenua through regular meetings where matters of common interest are discussed. Records of hui (meetings) with Maori organisations are kept. There is no evidence of disputes with Tangata Whenua over use rights.</p> <p>A procedure is now in place for karakia (Maori prayer) to be said over the lands concerned before undertaking harvesting and planting operations.</p>	
<p>Criterion 3.2: Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure</p>	

Current Wording	Audit comments
rights of indigenous peoples.	
<p>Indicator 3.2.1 Exclusive and Undisturbed Possession – Provision shall be made for the right of Tāngata Whenua to exclusive and undisturbed possession of their lands, forests, estates, fisheries and other taonga in accordance with the Treaty of Waitangi.</p>	<p>This is not auditable in its current wording.</p> <p>Do you mean:</p> <p>3.2.1: Any impacts of forest management on tangata whenua resources or tenure rights are identified and recorded.</p> <p>3.2.2: Tangata whenua are explicitly informed of any impacts that forest management may have on their resources or tenure rights.</p> <p>3.2.3: Forest management will not proceed without clear evidence of free and informed consent of the tangata whenua claiming such lands.</p>
<p>Indicator 3.2.2 Tāngata Whenua rights relating to their customary resources within the managed forests shall be protected by forest managers.</p> <p>Verifiers</p> <p>a) Forest managers shall consult directly with tangata whenua landowners to understand the important kaitiaki (stewardship) role of the tangata whenua.</p> <p>b) Forest Managers, in consultation with tangata whenua landowners shall establish a written record of the location and significance of traditional and customary taonga, areas, sites and features contained within and bordering the forest management land.</p> <p>c) Forest managers shall maintain a separate record of sensitive</p>	<p>The verifiers are very detailed and seem to overlap with 3.1.2.</p> <p>This is almost a prescription; it could be written as guidance notes.</p>

Current Wording	Audit comments
<p>customary sites and areas and maintain complete confidentiality of this record and ensure that disclosure is limited only to those parties agreed by the tangata whenua landowners. This information shall be contained in silent files.</p> <p>d) Forest managers, in consultation and agreement with the tangata whenua landowners shall prepare a management plan(s) detailing the protection techniques, processes and protocols for protection of customary sites and features, including areas of land to be excluded from forest operations.</p> <p>e) Forest managers shall provide access arrangements for tangata whenua landowners and parties assigned by them in respect of activities relating to the customary and traditional observance and protection of heritage and sacred sites.</p> <p>f) Forest managers shall adopt procedures to enable tangata whenua landowners to make modifications to management and operational plans in accordance with required changes.</p>	<p>This Indicator is about resources & tenure. 3.3 relates to Sites.</p> <p>As above. You could say – complies with the ECoP.</p> <p>What is meant by access “arrangements”?</p> <p>This is part of (d) above.</p>
<p>Indicator 3.2.3</p> <p>Ensure that documents are present describing the legal status of the land and management unit forest.</p> <p>Verifiers</p> <p>a) Forest managers maintain the following records and documents to confirm their status in relation to the land and in association to the tangata whenua landowner:</p> <ul style="list-style-type: none"> • Land certificates and title • Maps • Registered rights such as leases or rights of way 	<p>This is covered in 2.1.1 and is unnecessary in this Criterion.</p>

Current Wording	Audit comments
<ul style="list-style-type: none"> • Unregistered leases or licenses to occupy • Crown Forest Licenses • Forestry rights • Crown leases • Give and take boundary agreements • Existing Covenants or Agreements (eg Nga Whenua Rahui) • QEII Trust or Local Authority Agreement • Unregistered Wahi tapu areas • “Silent File” records <p>b) Forest managers provide silent file information access to tāngata whenua landowners and prevent the recording of silent file information on general information and land tenure maps unless written authority is first received from the tangata whenua landowner representatives.</p>	<p>Not sure what this could mean. Forest managers usually do not have access to silent file information.</p>
<p>Results for Pan Pac: Consultation is undertaken with local iwi representatives prior to the commencement of any major operations. Iwi are formally consulted as part of the Resource Consent process.</p> <p>Pan Pac has a Cultural Advisor to advise the General Manager about issues relating to various iwi and taonga.</p> <p>The Company has prepared a document contributing towards Kaitiakitanga for Mohaka Forest.</p>	
<p>Criterion 3.3: Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</p>	
<p>Indicator 3.3.1 Forest managers shall establish measures and protocols to enable active protection of the customary interests of tangata whenua landowners as set out in Indicator 3.2.2 and attached Verifiers.</p>	<p>You could include the words “(and other sections of the community)” after indigenous peoples to give effect to the Historic Places Act and so include</p>

Current Wording	Audit comments
	<p>early European sites, particularly gold mining sites.</p> <p>Then follow the audit process with Indicators that test & demonstrate:</p> <ol style="list-style-type: none"> 1. Sites of special cultural, historical, ecological, economic or religious significance are identified, described and mapped in co-operation with affected stakeholders. 2. Management plans are developed in co-operation. 3. Areas identified in working plans and demarcated as appropriate. 4. Operators and contractors can identify such sites and prevent damage. 5. Appropriate access is permitted.
<p>Indicator 3.3.2 Forest managers shall encourage tāngata whenua landowners to undertake their duty of kaitiakitanga (custodianship, stewardship and guardianship) over their customary lands, resources and taonga in accordance with the Treaty of Waitangi.</p> <p>Verifiers a) Forest managers shall consult directly with tangata whenua landowners in respect of their role as kaitiaki. b) Forest managers shall consider the environmental, social, cultural and</p>	<p>Does this Indicator relate to the Criterion?</p> <p>Difficult to audit “encourage”.</p> <p>Is this the same as in 3.3.1?</p>

Current Wording	Audit comments
environmental benefits of applying kaitiakitanga.	These verifiers do not link to the Indicator. Difficult to audit “consider”.
<p>Indicator 3.3.3</p> <p>Managers shall develop and implement accidental discovery protocols where discovery of a new or threatened site occurs during forest operations.</p> <p>Verifiers</p> <p>a) All contractors shall be made aware of the protocols attached to accidental discovery</p> <p>b) All Wāhi Tapu sites are provided with appropriate protection</p> <p>c) Other sites of historic, cultural, or scientific interest are provided with protection appropriate to their status.</p> <p>d) An agreed process of mitigation of potential damage is prepared and implemented jointly by the forest manager and the tangata whenua land owner.</p> <p>e) An agreed process is implemented to enable tāngata whenua and forest managers to monitor these sites.</p> <p>f) In the event of accidental discovery, the forest manager shall urgently implement the following procedures:</p> <ul style="list-style-type: none"> • Work shall be immediately stopped • The forest manager shall contact the tangata whenua representatives • An assessment of the site or feature shall be undertaken with appropriate experts <p>Appropriate restoration and protection measures are agreed by the forest managers and the tangata whenua landowner group.</p>	<p>This wording is a bit clumsy. ADP should be developed before implementation!</p> <p>Rather than write the protocol or management plan, do you simply need to ensure that the procedure or protocol is followed?</p>

Current Wording	Audit comments
<p>Results for Pan Pac: Archaeological and wahi tapu (sacred) sites are noted on forest plans and measures taken to protect them. Training courses for contractors have been held in the identification of archaeological sites. There are documented procedures for new discoveries.</p> <p>A number of sites on Pan Pac freehold land have been identified and marked on the ground.</p>	
<p>Criterion 3.4: Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</p>	
<p>Indicator 3.4.1 Forest manager shall obtain permission of the tangata whenua landowner prior to utilising their traditional practices, knowledge or intellectual property.</p> <p>Verifier</p> <p>a) Forest managers shall consult directly with the tangata whenua landowners prior to to utilising their traditional practices, knowledge or intellectual property.</p> <p>b) Forest managers shall document any traditional practices or knowledge that is intended to be or is utilised commercially or is being held by them.</p> <p>c) When traditional knowledge is used commercially by the forest manager (or any other organisation under an agreement with the manager), compensation or any form of reward is formally agreed with the tangata whenua landowner before forest operations commence. Forest managers pay compensation due to tangata whenua landowners in accordance with the quantity and timelines of</p>	<p>These verifiers almost follow the audit process that should be described via the Indicators:</p> <ol style="list-style-type: none"> 1. The traditional knowledge that could be used in plantation operations is documented. 2. The use of such knowledge will not proceed without free & informed consent. 3. Compensation is agreed before such knowledge is used. 4. Compensation is paid.

Current Wording	Audit comments
<p>the agreement.</p> <p>d) A dispute resolution procedure shall be agreed between forest managers and the tangata whenua landowners prior to the utilisation of this traditional information by the former</p>	
<p>Results for Pan Pac: Traditional knowledge is not applied as Company forests are exotic plantations.</p>	

Principle 4: Community Relations and Worker’s Rights

Forest management operations shall maintain or enhance the long-term social and economic well being of forest workers and local communities.

Current Wording	Audit comments
<p>Criterion 4.1: The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services</p>	
<p>Indicator 4.1.1 Individuals are identified with responsibility for liaison and consultation with local communities and resolution of grievances relating to the operation of this principle.</p>	<p>This does nothing to expand on the Criterion. It is better related to 4.5, as is 4.1.2. Recommend removal of both.</p>
<p>Indicator 4.1.3 The certificate holder and/or forestry operator shall promote employment and training opportunities</p> <p>Verifier Provisions for the following have been made:</p> <ul style="list-style-type: none"> • Provisions that demonstrate a commitment to hiring and contracting, locally, to the extent feasible in light of local capacity and required workplace skills, cost considerations and any legal obligations, relative to the employment of local people. • The forestry operator shall maintain a record of the type of training opportunities organised for the workforce. 	<p>Consistent wording about who shall is required throughout the standard. Difficult to audit “promote”. Do you mean: people in local communities are given opportunities in employment, contracting and training. The verifiers could be presented as guidance notes – what should be there & why. This comes under the current 4.1.4.</p>

Current Wording	Audit comments
<p>Indicator 4.1.4 L Certificate holders contribute to the development of training programmes aimed at enhancing the skills and qualifications of the local workforce</p> <p>Verifier</p> <p>a) Contributions can be financial or in-kind. The standard can be satisfied if the certificate holder:</p> <ul style="list-style-type: none"> Contributes financially to Forests Industry Training via membership of NZFOA or NZFFA; or • Contributes financially towards the training programme; or • Provides in-kind support by using staff to provide the training; or • Provides in-kind support by providing the training venue, food etc; or • Pays contractors while they are being trained; or • Includes a training component in the contractors' rate; or • Contributes in a similar manner appropriate to the scale of the operation 	<p>These are guidance notes, not verifiers.</p>
<p>Indicator 4.1.5 Certificate holders shall give preference to local vendors of equipment and ancillary services, to the extent feasible in light of local capacity, cost considerations and any legal obligations.</p>	<p>Fine as it is.</p>
<p>Results for Pan Pac: 97.5% of the workforce is local. A 2005 workforce survey showed that 32% of the workforce (staff and contractor employees) are of Maori descent and of these, 62% are from East Cape iwi groups.</p> <p>The Company supports a variety of specialised training for its employees. Forest Coordinators' Records of Learning and records of contractors' crews' achievements were seen.</p> <p>Permits are issued for a wide range of activities including hunting, firewood and plant collecting and a range of recreational activities.</p>	

Current Wording	Audit comments
<p>Interviews confirmed that the Company complies with NZ employment law.</p> <p>Pan Pac provides significant sponsorship to local organisations and activities including significant support to the Rescue Helicopter operation, to the development of a local reserve and for the construction of a shelter at a local Marae. The Company actively promotes local conservation efforts through sponsorship and staff involvement.</p> <p>SA 2009 The company continues to sponsor key local initiatives, despite the economic downturn.</p>	
<p>Criterion 4.2: Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families</p>	
<p>Indicator 4.2.1</p> <p>Certificate holders shall comply with the HSE Act and its associated regulations and the relevant codes of practice and best practice guidelines.</p> <p>Verifiers</p> <p>a) A Health and Safety and Management System is in place which systematically identifies and documents hazards, preventive measures, emergency procedures and key responsibilities that ensures health and safety requirements are taken in to account in the planning, organisation implementation and supervision of all operations.</p> <p>b) All employees and contractors have access to adequate on-site first aid, appropriate shelter while working in the forestry management unit and there is a plan for emergency evacuation if required.</p> <p>c) Health and Safety Policies and management systems shall ensure that adequate provisions are made for employees and contractors to:</p> <ul style="list-style-type: none"> • Have regular breaks during the course of work periods for the purposes of rest and meals. • Ensure that work operations performed outside of daylight hours 	<p>The wording of the Indicator is fine if “Certificate Holder” is the chosen descriptor in the rest of the Standard.</p> <p>The verifiers are very detailed and follow the key points from ACC.</p> <p>They could be incorporated as guidance notes.</p> <p>Evidence is normally from DOL or ACC accreditation</p>

Current Wording	Audit comments
<p>are carried out with lighting systems that meet OSH requirements.</p> <ul style="list-style-type: none"> • Have had relevant training in safe working practice and at least two of every crew hold a current first aid certificate. • Have all necessary tools, machines, substances and equipment including appropriate personal protective equipment available at the work site and are in a safe and serviceable condition. <p>d) Health and Safety Policies and management systems shall also include the following provisions:</p> <ul style="list-style-type: none"> • Managers, employees and contractors understand their responsibilities under the HSE Act • There are up to date training records or other documented skills records for employees and contractors • There are up to date health & safety induction records for employees and contractors • Hazard identification is undertaken • Accident reports are documented and up to date • After accidents internal processes are examined to avoid reoccurrence;] • There are regular compliance checks against the relevant Code(s) of Practice • Communication from the regulatory authority is recorded and responded to • Contract provisions of service contractors include HSE Act compliance requirements • Health and safety training shall be undertaken having regard to the procedures set out in the Department of Labour’s Safety and Health in Forestry Operations Code of Practice and Best Practice Guidelines 	

Current Wording	Audit comments
<p>Indicator 4.2.2</p> <p>There shall be a written emergency plan in case of serious injury to any forest worker or contractor, and which includes provision for timely evacuation to an appropriately equipped medical facility.</p>	<p>This comes under 4.2.1.</p> <p>I do not think your Indicators adequately cover the Criterion. Rather than have a monster coverall in 4.2.1, you could consider an audit process:</p> <p>Aware of and comply with HSE Act (as you have);</p> <p>Assess and document the risks associated with all tasks (in the Act);</p> <p>Relevant training is provided and documented;</p> <p>Tools, machines and other equipment are safe;</p> <p>Health and safety documentation is up to date.</p>
<p>Results for Pan Pac: Excellent Health and Safety systems are in place. Statistics and records are well-maintained.</p> <p>Contractors appreciate the Company’s hazard identification and can add to it. Near miss reporting is encouraged. No lost time injuries in forestry (silvicultural) operations for 35 months.</p>	
<p>Criterion 4.3: The rights of the workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labour Organisation (ILO)</p>	
<p>Indicator 4.3.1</p> <p>Where the certificate holder directly employs labour they shall demonstrate compliance with the Employment Relations Act (2000), the Wages Protection Act (1983), the Holidays Act (1991) and the Minimum Wages Act (1985).</p>	<p>This Indicator seems fine. The Acts could be placed in Guidance notes, so the Indicator becomes “complies with appropriate legislation” and therefore not bound by current legislation.</p>

Current Wording	Audit comments
<p>Verifier Comply with the Acts listed in the indicator</p>	<p>The verifier is not required as the Acts are already listed.</p>
<p>Indicator 4.3.2 The role and function of independently established unions in promoting members' collective employment interests and representing members in collective bargaining is acknowledged. Requests from Union Representatives seeking information on the work location of employees who are either employed by contractors engaged by the certificate holder or as their own employees shall be supplied in a timely manner.</p>	<p>This is not an Indicator nor is it easily auditable. Do you mean: Workers are free to organise or join a trade union of their choice without fear of intimidation or reprisal.</p>
<p>Indicator 4.3.3 L Employers who directly employ labour shall establish policy and procedures that include provisions ensuring that:</p> <ul style="list-style-type: none"> • The role and function of Unions is facilitated at all times. • Staff members with the responsibility/delegated authority to liase/ negotiate with Union(s) are confirmed and identified. • Where workers are Union members, wage bargaining arrangements shall proceed on the basis of collective bargaining. • All employees shall be qualified in skills that are relevant to the tasks they are performing or be under training to acquire such skills, in line with relevant industry training organisations standards. • Issues raised by Unions are treated constructively, objectively and in the spirit of good faith. • Where workers are Union members, wage bargaining 	<p>This Indicator is very detailed and prescriptive. It would be covered by suggested replacement in 4.3.2. Another Indicator could be: Workers are free to organise and bargain collectively.</p>

Current Wording	Audit comments
<p>shall proceed on the basis of collective agreement/s.</p> <ul style="list-style-type: none"> Resolution procedures dealing with employment relationship problems shall contain provisions to handle such matters by allowing for both dialogue between staff, unions and management, as a means of resolution procedure, as well as independent third party mediation assistance. 	
<p>Indicator 4.3.4 Interested individuals shall be able to form and/or join organizations of their choice (including trade unions) without fear of intimidation or reprisal.</p>	<p>This would actually be a better replacement for 4.3.2 and 4.3.3.</p>
<p>Results for Pan Pac: No contractors are members of unions. However, there is no evidence of employees being prevented from collective bargaining. Staff are employed on individual contracts.</p>	
<p>Criterion 4.4: Management planning and operations shall incorporate the results of evaluations of social impact. Consultation shall be maintained with people and groups directly affected by management operations.</p>	
<p>Indicator 4.4.1 Substantive change to established practices will be managed in a timely and open manner</p>	<p>This does not appear to relate to 4.4.1. It is difficult to audit in its current wording.</p> <p>If it is needed, it should be the final Indicator in this section.</p>

Current Wording	Audit comments
<p>Indicator 4.4.2 When planning forest operations there is communication with stakeholders affected by those operations</p> <p>Verifier The certificate holder records and responds constructively to community or other stakeholder complaints or requests provided the complaint or request is neither vexatious nor frivolous and acts fairly to all parties.</p>	<p>The Indicators numbered 4.4.2, 4.4.3, & 4.4.4 should be replaced by the Indicators numbered 4.5.4 – 4.5.8 as these follow a more logical audit process.</p>
<p>Indicator 4.4.3 S The enterprise shall identify and document the potential social impacts resulting from its operations, in consultation with the people and groups who are directly affected.</p>	
<p>Indicator 4.4.4. S The enterprise shall demonstrate how it has incorporated the results of its evaluation of social impacts into its management planning and operations.</p>	
<p>Indicator 4.5.4 L There are documented policies and procedures for assessing the social implications of forest management plans (including new afforestation projects), policy changes, and forest operations</p>	<p>Renumber as 4.4.1</p>

Current Wording	Audit comments
<p>Indicator 4.5.5 L The management plan for the defined forest area contains a section presenting the results of periodic social impact assessments, appropriate to the scale of operations</p>	<p>Becomes 4.4.2. The red 4.4.3 S becomes the SLIMF subset.</p>
<p>Indicator 4.5.6 L Management activities and policies are modified, as appropriate, in response to the results of social impact assessment</p>	<p>Becomes 4.4.3. The red 4.4.4 S becomes the SLIMF subset</p>
<p>Indicator 4.5.7 There is a database or other record of neighbours and other stakeholders</p>	<p>Becomes 4.4.4</p>
<p>Indicator 4.5.8 Forest managers endeavour to keep neighbours and members of relevant local communities informed as to planned activities on the defined forest area</p>	<p>Becomes 4.4.5. Red 4.4.2 says similar things.</p>

Current Wording	Audit comments
<p>Results for Pan Pac: SIA used effectively in Waipatiki logging operation. The Company is very active in informing neighbours of forestry operations that may impact on them.</p> <p>The Company is regarded as being constructive in their dealings with stakeholders and affected communities.</p> <p>SA 2009: The stakeholder list is updated annually and is categorised according to stakeholder-type.</p>	
<p>Criterion 4.5: Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage</p>	
<p>Indicator 4.5.1 Procedures are employed for resolving grievances involving claimed loss or damage to property, health and/or rights, caused by forest operations</p>	<p>Procedures need to be defined or documented</p>
<p>Indicator 4.5.2 Third party mediation should be considered before other methods are used to resolve grievances</p>	<p>This is a method of achieving 4.5.1.</p> <p>Do you mean: Every reasonable effort is made to resolve disputes through methods aimed at achieving agreement and consent.</p>
<p>Indicator 4.5.3 Measures are taken to lessen the risk of similar loss or damage occurring on subsequent occasions.</p>	<p>OK</p>
<p>Results for Pan Pac: The company is pro-active in calling meetings to discuss matters of common interest in order to avoid issue arising, and is open to finding ways to resolve any issues.</p>	

Principle 5: Benefits from the Forest

Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.

Current Wording	Audit comments
Criterion 5.1: Forest management should strive towards economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.	
Indicator 5.1.1 Plantation managers will be free to maximise the economic return from plantation forests provided their operations meet statutory requirements and comply with Criterion 5.1.	Same comment about plantation managers/forest managers/certificate holders. Need to be consistent through the Standard. “will be free” is difficult to audit. What does it mean? We are in Criterion 5.1, so how do we comply – that is the question! <u>Do you mean:</u> Optimal use is made of the potential yield of forest products.
Indicator 5.1.2 The costs and benefits of environmental and social effects are identified and an ongoing commitment to the National Plantation Standard is incorporated into an annual plan. Verifier The benefits from non-wood products and environmental services from the forest should be recognised in the annual plan.	This seems to mix 2 issues. Commitment to the NPS is covered in 1.6.1. Then the costs and benefits not only need to be identified but also incorporated into an Annual Plan or budget. The verifier then becomes superfluous. A guidance note may be needed to identify key environmental services, such

	as recreation (especially Mountain bike tracks), protection of water supply catchments, maintenance of biodiversity, fire control, forest research.
<p>Indicator 5.1.3</p> <p>Within the constraints of safety and environmental protection, the certificate holder shall demonstrate intent to accommodate appropriate types and levels of recreational access. Access, including recreational access, through forestry areas to adjacent land shall be in consultation with the affected landowners. Access through forestry areas shall not be permitted where it will lead to adverse effects for other values including but not limited to tino rangatiratanga.</p> <p>Verifier</p> <p>The certificate holder operates a permit system or other access management method that accurately records forest access usage.</p> <p>Social benefits shall include such activities as traditional cultural harvesting, provided the activity is legally permissible and consistent with Māori traditional practices.</p>	<p>This does not fit within this Criterion and is best considered in 5.5</p> <p>The wording will need to be put into Standard-speak, with some guidance notes.</p>
<p>Indicator 5.1.5 L</p> <p>There shall be a financial plan which estimates the cost and expected revenues from implementing the forest management plan</p> <p>Verifiers</p> <p>The financial plan should be for at least a five year period</p> <p>There is a budget showing the expected costs and revenues for the forest</p>	<p>This is covered in 5.1.2 if the new wording is accepted.</p> <p>This level of prescription is not appropriate for large organisations. Who is to comment on “reasonable”?</p>

<p>management enterprise for at least the current year</p> <p>The budget includes all costs for significant activities and investments</p> <p>The cost and revenue estimates are reasonable</p> <p>Indicator 5.1.5 S There shall be a budget showing the expected costs and revenues for the forest management enterprise for at least the current financial year.</p>	<p>A guidance note may be appropriate for the smaller enterprises.</p>
<p>Results for Pan Pac: The company makes optimal use of the volume harvested. It audits cutting strategies and monitors the productive status of the forests.</p> <p>Budgets contain provision for environmental and social costs and contributions.</p> <p>SA 2009: Estate modelling practices now moving towards volume rather than area, and have become leading edge nationally.</p>	
<p>Criterion 5.2: Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.</p>	
<p>Indicator 5.2.1 An annual statement of all products from the forest management unit will be available. The statement will include non-timber products, where these can be practically quantified.</p>	<p>OK with this</p>
<p>Indicator 5.2.2</p>	

<p>Certificate holders shall demonstrate a commitment to local processing by consideration of financial viability, social advantages and environmental gains.</p> <p>Verifier Non-local processing is acceptable following consideration of financial viability, environmental effects, including transport, community viability and cohesiveness, and efficient use of products from the forest management unit.</p>	<p>Difficult to audit – how to audit “demonstrate a commitment”?</p> <p><u>Do you mean:</u> Local processors are provided access to forest products available from the FMU unless there is a justifiable reason for not doing so.</p> <p>The verifier is best used as a guidance note.</p>
<p>Results for Pan Pac: Logs are sold locally whenever possible. The Company promotes sustainable forest management through leadership of the Hawkes Bay Forestry Group.</p>	
<p>Criterion 5.3: Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</p>	
<p>Indicator 5.3.1 Within the constraints of financial viability and environmental protection, planning processes will be implemented that minimise waste from harvest and processing operations.</p> <p>Verifier Harvest and on-site processing plans shall have in place strategies to reduce and contain waste. This can be verified by a random sample of harvest and on-site processing plans and their implementations.</p>	<p>This Indicator is repeating the Criterion and not describing components of it.</p> <p>Recommend removal.</p>
<p>Indicator 5.3.2 Strategic and tactical/operational harvest planning and harvest operations shall be carried out in accordance with national best</p>	

practise guidelines.	This is the logical 5.3.1 and should be moved.
<p>Indicator 5.3.3 L</p> <p>Large scale maps shall be developed for all compartments prior to harvesting, identifying compartment boundaries, protected areas, extraction routes and depots within the compartment, and storage sites for consumer and production wastes.</p>	This Indicator is not needed as all items fall within the scope of the Best Practice Guidelines
<p>Indicator 5.3.4</p> <p>Harvesting operations minimise avoidable waste and residual stand damage, while maximising value recovery from the coupe.</p>	OK
<p>Indicator 5.3.5</p> <p>Harvesting, log merchandising and log sorting operations minimise product wastage, de-grade and foregone revenue opportunities.</p>	Covered in 5.3.4
<p>Results for Pan Pac: Harvesting techniques and equipment ensure harvesting to best effect at each site. Waste is minimised and audited. Regular reviews of yields and the cutting strategy were evident. Pan Pac's estate planning system exceeds national best practice</p>	
<p>Criterion 5.4: Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>	
<p>Indicator 5.4.1</p> <p>The forest shall be managed for both timber and non-timber products.</p>	The use of the word "shall" is significant here. Shall the forests be managed

<p>Verifier Use of non-timber products from production areas shall be supported when these are operationally acceptable and compliant with any contractual obligations and have been assessed for their environmental effects on both the production areas and the surrounding reserve areas.</p>	<p>for NTFP?</p> <p>The verifier reads like an Indicator.</p> <p>If an organisation is non-compliant with this Indicator, because there is only 1 Indicator in this Criterion, non-compliance rates a Major CAR.</p> <p>Guidance on what constitutes NTFP is required.</p>
<p>Results for Pan Pac: Non-timber forest products include Christmas trees, firewood and honey. A number of grazing leases are in place. Collection of rongoa is permitted.</p>	
<p>Criterion 5.5: Forest management operations shall recognize, maintain and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p>	
<p>Indicator 5.5.1 Forest management will identify water catchment areas and fisheries that may be compromised by management operations.</p>	<p>Difficult to audit “may be compromised”.</p> <p><u>Do you mean:</u> Forest managers have identified the range of forest services and resources.</p>
<p>Indicator 5.5.2 Operational procedures will include provisions relating to maintenance or enhancement of those water catchment areas and fisheries.</p>	<p>Difficult to audit.</p> <p><u>Do you mean:</u> Forest management practices minimise negative impacts on services and other forest resources.</p>

<p>Indicator 5.5.3 L</p> <p>The management plan (or equivalent documentation) shall specify appropriate measures to maintain and/or enhance the value of each identified forest service or resource.</p>	<p>Really means the same as above.</p>
<p>Results for Pan Pac: Water courses and their catchment areas are mapped. Careful management of riparian zones, roading and tracking to protect and enhance streams was evident. The system for monitoring large culverts, quarries, bridges & old super-skid sites exceeds national best practice.</p>	
<p>Criterion 5.6: The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p>	
<p>Indicator 5.6.1</p> <p>An annual statement of total wood volumes harvested from the forest management unit will be available</p>	<p>OK</p>
<p>Indicator 5.6.2</p> <p>The certificate holder shall demonstrate adequate consideration, consistent with the scale and intensity of management of the forest management unit, of local employment opportunities where change in the volume and/or range of products from the forest management unit is planned</p>	<p>This relates to 5.2 and 4.1 and 4.4. Recommend removal from this Criterion.</p>
<p>Indicator 5.6.3</p> <p>Where a landowner decides to convert land from a productive species to a less productive one, or from forest to some other use, this conversion will be effected in such a way as to minimise adverse</p>	<p>This is covered in Principle 6 and Principle 10. Not appropriate here.</p>

<p>social impacts, but a permanent reduction in yields will of course be unavoidable.</p>	
<p>Indicator 5.6.4</p> <p>The enterprise shall have a clear methodology to determine allowable cut.</p>	<p>OK, but suggest adding “and the sustainable harvest levels for the FMU have been calculated using the most up-to-date information, and do not exceed the calculated long term harvest levels.”</p>
<p>Indicator 5.6.5 L</p> <p>The allowable cut shall not jeopardise the forest’s productive potential to maintain its environmental or social services in the medium to long term.</p>	<p>Might need a guidance note to explain this further.</p>
<p>Indicator 5.6.6 L</p> <p>Data on growth, regeneration and volumes harvested and/or thinned shall be reported regularly and analysed in comparison with predicted volumes and growth data.</p>	<p>OK</p>
<p>Results for Pan Pac: The company maintains Permanent Sample Plots (PSP’s) in all its forests. These are measured in accordance with national protocols and reported through the established systems. The data is incorporated into yield tables.</p> <p>Sustainable harvest calculations are based on Net Stocked Area (NSA) divided by 30 (Target Rotational Age).</p> <p>SA2009: Now based on sustainable volume as measured and calculated through the Woodstock estate model.</p>	

Principle 6: Environmental Impact

Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.

Current Wording	Audit comments
<p>Criterion 6.1: Assessment of environmental impacts shall be completed - appropriate to the scale, intensity of forest management and the uniqueness of the affected resources - and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site disturbing operations.</p>	
<p>Indicator 6.1.1</p> <p>The certificate holder has systematically identified and assessed the potential environmental impacts of all activities (including on-site processing facilities) carried out within the Forest Management Unit appropriate to the scale and intensity of forest management.</p> <p>This assessment process shall include consideration at a landscape level, taking into account interaction with adjoining land, nearby habitats and downstream impacts. The assessment should include consideration of the potential for the following:</p> <ul style="list-style-type: none"> • Soil erosion • Water quality and hydrological impacts • Compaction and changes to soil productivity • Changes to invasive exotic flora or fauna abundance • Potential impacts on any areas identified as having High Conservation Value • Impacts to poorly represented, threatened or endangered 	<p>This first paragraph is fine as an Indicator with the following words added – in accordance with the NZ Environmental Code of Practice. The results of these impact assessments shall be documented.</p> <p>The rest of the words & the Verifier really tell what to do and mirror the words of the Principle in some cases.</p> <p>Some guidance notes may be useful, but it is all in the ECoP and not necessary to repeat.</p>

Current Wording	Audit comments
<p>species</p> <ul style="list-style-type: none"> • Pesticide or fertiliser pollution (by runoff, spray drift or spillage) • Visual changes to significant landscapes identified in Regional or District Plans, or very prominent landscapes ref 10.2.6 • Community and recreation impacts • Damage to riparian/ stream buffer strips <p>Verifiers</p> <ol style="list-style-type: none"> a. The assessment process in accordance with indicator 6.1.1 shall have been completed prior to harvest planning. b. The management plans and other relevant policies and procedures of the enterprise shall clearly identify the actions to be taken to mitigate or reduce the environmental impacts identified as a result of the assessments. c. Site specific assessments of the potential environmental impacts of all forest operations are carried out prior to commencement of the activity on site, in a manner appropriate to the scale of the operations and the sensitivity of the site. The assessment process shall identify the environmental values present, potential impacts on those values by the proposed forest operations, and site specific requirements to manage risks and potential impacts. The outcome of this process must be documented in a site specific work prescription or harvest plan. 	
<p>This standard does not follow the audit process of other FSC-approved</p>	<p>In my view the standard needs to address:</p>

Current Wording	Audit comments
<p>generic standards in teasing out the necessary components of the Criterion.</p>	<p>Site specific assessments of forest operations;</p> <p>Consideration of potential environmental impacts & mitigation of those;</p> <p>A system to identify and correct non-compliance with prescriptions.</p>
<p>Indicator 6.1.2</p> <p>Known sportfish and game bird habitats within the certified forest area are documented.</p>	<p>In my view this Indicator does not fit here. This Criterion 6.1 is about environmental impacts.</p> <p>There may be a case for inclusion under 6.2, 7.1 or 10.2.</p>
<p>Results for Pan Pac: An “Environmental Effects Matrix” is used to rank the potential impact severity of forestry operations within each forest of the estate. From this suitable operational checklists are developed. Protocols minimise adverse effects. It is a well-developed and integrated system.</p> <p>A tiered audit system is in place to ensure compliance with operational protocols and minimisation of environmental incidents.</p> <p>Planning documents for forest operations and earthwork prescriptions are extensive and allow the company to identify the potential environmental impacts of each of their operations.</p>	
<p>Criterion 6.2: Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping and collecting shall be controlled.</p>	
<p>Indicator 6.2.1</p> <p>A policy and management plan for the maintenance of populations of rare, threatened and endangered species is prepared and</p>	<p>Refer to web site</p>

Current Wording	Audit comments
<p>progressively updated in consultation with the Department of Conservation and/or other competent experts.</p> <p>Verifiers</p> <p>A management plan for the maintenance of populations of rare, threatened and endangered species occurring within the FMU has been prepared. Suggestions supplied by DoC and/or other competent experts have been addressed in policies and plans and/or management plans and are consistent with national guidelines for the maintenance of rare, threatened or endangered species .</p>	
<p>Indicator 6.2.2</p> <p>Identification and protection of indigenous habitat supporting rare, threatened or endangered species and areas identified as being significant to their life cycle is addressed in management planning. A coarse level assessment has been undertaken to identify the known or likely presence and distribution of rare, threatened and endangered species within the forest management unit. This assessment should take into account:</p> <ul style="list-style-type: none"> • Known species distributions • Advice from Dept of Conservation and other competent experts • Past survey data • Records of previous sightings of rare, threatened and endangered species within forests <p>Verifiers</p> <p>The presence of populations of rare, threatened or endangered species or</p>	<p>These verifiers are very detailed and appear to repeat the Indicator.</p>

Current Wording	Audit comments
<p>areas identified as being significant to their life cycle in production areas of the Forest Management Unit are progressively identified in management plans and mapped as either 'known presence' or 'reasonable expectation of finding'.</p> <p>Indigenous habitats (excluding management unit forest understorey) which are significant to the life cycle of rare, threatened or endangered species are progressively identified and protected as designated reserve areas, in accordance with the following timelines:</p> <p>(i) Documented populations of threatened birds or bats where the information could be gathered as a desk top exercise – to be completed by first certification</p> <p>(ii) Areas adjoining areas planned for harvest – to be completed before harvest in any particular area.</p> <p>(iii) For the remainder of the FMU within 5 years of first certification.</p> <p>(iv) The network of protected reserves is reviewed and revised as new information is gathered, but at least every 5 years.</p>	
<p>Indicator 6.2.3</p> <p>In reserve areas supporting rare, threatened and endangered species, weeds and pests that are significantly impacting on the rare and threatened species will be controlled.</p> <p>Verifiers</p> <p>Weed and pest control plans are prepared that assess the level of control necessary to maintain viable habitat for the rare, threatened or endangered for which the reserve has been identified</p>	<p>How to audit significantly impacting?</p> <p>Should pest management be included in the management plan in 6.2.1.</p>

Current Wording	Audit comments
<p>Within one year of identification and protection, pest and weed control plans are implemented in priority areas. Priority areas are areas that are significant to the life cycle of nationally or internationally threatened species or adjacent to areas being harvested.</p> <p>Within three years of identification and protection, pest and weed control plans to ensure the maintenance or rare, threatened or endangered species are implemented over all reserve areas designated as requiring management of those species.</p> <p>Specific weed and pest management activities designed to protect the associated biodiversity within reserve areas supporting rare, threatened or endangered species shall be defined and implemented within 2 years of certification.</p>	
<p>Indicator 6.2.4</p> <p>Existing habitat within reserve areas under 6.2.2 shall be progressively assessed and where appropriate restoration or expansion undertaken.</p> <p>Verifiers</p> <p>Within 5 years of identification and protection of indigenous reserve areas, an evaluation of the benefit of active restoration has been carried out. The primary criteria being applied to the evaluation would be whether the active restoration would significantly increase the survival of the threatened species for which the habitat has been protected.</p> <p>Where active restoration has been identified as providing benefit per</p>	<p>How to audit “appropriate restoration”.</p> <p>OK but how to include?</p>

Current Wording	Audit comments
<p>6.2.4(a) then that restoration is undertaken and documented.</p> <p>An evaluation of the benefit of expanding the area of a reserve to secure the viability of populations of rare, threatened or endangered species, has been carried out at harvest of the adjacent production forest. The evaluation shall be guided by the following site criteria:</p> <ul style="list-style-type: none"> i. biologically viable shape and size ii. socially and economically logical iii. suitable for restoration to habitat for species being considered iv. links to other reserve area v. buffering from adjoining land uses, pests and disturbance event like fire and wind. <p>Where expansion has been identified as providing benefit per 6.2.4(a) then that expansion is undertaken and documented and appropriate management actions taken.</p>	
<p>Indicator 6.2.5</p> <p>The primary management objective of reserve areas under 6.2 is their viability for rare, threatened or endangered species present. Other activities including recreation and hunting should only be permitted if the primary management objective is not compromised.</p> <p>Verifiers</p> <p>Assessments of the effect of activities that occur in designated reserve areas other than the primary management objective are to be progressively</p>	<p>What is the intent of this Indicator?</p> <p>It is covered by 6.2.2 and 6.2.4.</p> <p>Recommend removal</p>

Current Wording	Audit comments
<p>carried out in management plans. Where other activities are identified as likely to be compromising the primary objective of a reserve then actions are implemented to protect the reserve. This may include education programmes for reserve users, not permitting certain activities or preventing access.</p>	
<p>Indicator 6.2.6</p> <p>Rare, threatened or endangered species known to be present, or discovered in production areas are protected and managed appropriately.</p> <p>Verifiers</p> <p>Management plans detail steps to be taken to protect rare, threatened or endangered species in production areas. Employees and contractors are progressively trained in recognition rare, threatened and endangered species and aware of contingency planning to enable the protection of located species. Training is provided for employees/contractors to enable them to recognise and know what steps to take with rare, threatened or endangered species. Employees and contractors are encouraged to report the presence of rare, threatened or endangered species.</p>	<p>Comments the same as above</p>
<p>Results for Pan Pac: Coarse level assessments of conservation values and in-depth surveys for specific RTE species have been undertaken, e.g. long-tailed bats, kiwi, blue duck, and falcon. The Company has developed an Ecological Management Plan (latest version 2006) which provides a detailed assessment of indigenous areas within their forests, lists the RTE species present, and provides ecological targets and objectives in the management of these conservation areas and species. A well developed mapping system identifies location and importance of conservation areas within any operational area. The Company has developed excellent processes to minimise adverse</p>	

Current Wording	Audit comments
effects of their spraying operations on the environment.	
<p>Criterion 6.3: Ecological functions and values shall be maintained intact, enhanced, or restored, including:</p> <ul style="list-style-type: none"> • Forest regeneration and succession. • Genetic, species and ecosystem diversity. • Natural cycles that affect the productivity of the forest ecosystem 	
<p>Indicator 6.3.1</p> <p>Topsoil displacement from the planting area will be minimised.</p>	<p>Not appropriate in this Criterion. Best in 6.1</p>
<p>Indicator 6.3.2</p> <p>Safeguards shall be progressively put in place to minimise adverse effects on water quality and aquatic ecology.</p>	<p>OK</p>
<p>Indicator 6.3.3</p> <p>The certificate holder shall comply with any resource consent that addresses those matters set out in Indicator 6.3.4.</p>	<p>OK</p>

Current Wording	Audit comments
<p>Indicator 6.3.4</p> <p>Where no resource consent is required for those matters set out in Indicators 6.3.2 –6.3.3 the certificate holder shall comply with the standards set out below.</p> <ol style="list-style-type: none"> 1. <i>All vegetation felled within the riparian zone shall be felled away from the waterbody, except edge vegetation or vegetation leaning over a waterbody, which if necessary may be felled in accordance with safety practices.</i> 2. <i>Where vegetation is cleared within a designated riparian zone (refer 10.2.3) regeneration of suitable vegetation shall be encouraged as soon as practicable.</i> 3. <i>All practicable steps shall be taken to avoid dragging logs or trees through the bed of a flowing river, lake or wetland or the sea</i> 4. <i>No storage or mixing of fuels, oils, agrichemicals or similar substances shall be undertaken in areas where a deliberate or inadvertent discharge could enter any waterbody</i> 5. <i>All disturbed vegetation, soil or debris shall be deposited or contained to prevent the movement of the disturbed matter so that it does not result in:</i> <ul style="list-style-type: none"> • <i>the diversion, damming or blockage of any river or stream</i> • <i>the passage of fish being impeded</i> • <i>the destruction of any habitat in a waterbody or coastal water</i> • <i>flooding or erosion</i> • <i>downstream property damage</i> 	<p>Could be “Shall comply with the NZ Environmental Code of Practice for Plantation Forestry”.</p> <p>The numbered points then become redundant.</p>

Current Wording	Audit comments
<p>Indicator 6.3.5</p> <p>Weed and pest control plans as dictated in 6.2.3, 6.4.3, 10.2.4, are progressively implemented to support the maintenance of ecological functions including ecosystem regeneration and species diversity.</p>	<p>OK</p>
<p>Results for Pan Pac: Natural forest areas are protected as reserves. Pan Pac provides enhancement of indigenous areas throughout its estate. Operational prescriptions outline the correct BMPs for operating near important conservation areas. Water monitoring sites are chosen to allow data to be collected over the rotation of a forest. The Company has a well developed weed monitoring programme and “Indigenous Area Monitoring System”.</p>	
<p>Criterion 6.4: Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>	
<p>Indicator 6.4.1</p> <p>To maintain biodiversity, certificate holders shall recognise the long-term goal of establishing a representative network of reserve areas of sufficient size to protect natural biodiversity according to Tikanga and scientific evidence.</p> <p>Certificate holders shall have in place a policy and management plan to progressively identify and protect a range of representative reserve areas. These can be any of the following:</p> <ul style="list-style-type: none"> a) Representative indigenous areas including non forested areas and wetlands b) Poorly represented or very poorly represented ecosystems 	<p>OK</p>

Current Wording	Audit comments
<p>(a subset of (a))</p> <p>c) Indigenous habitat for rare, endangered or threatened species (covered in 6.2)</p> <p>d) Indigenous riparian zones covered in 10.2.1 – 10.2.4</p> <p>e) Indigenous wildlife corridors (covered in 10.2.6)</p> <p>Verifiers</p> <p>The network of representative indigenous areas within the forest management unit are progressively identified, mapped and recorded on management plans.</p> <p><i>(i) All existing indigenous reserves shall be progressively identified and protected as reserve areas within 5 years of first certification. This includes:</i></p> <ul style="list-style-type: none"> • <i>indigenous forest remnants over 5 ha</i> • <i>any other natural ecosystem areas over 1ha</i> • <i>any other vegetation meeting the definitions for protection under the NZ Forest Accord</i> <p><i>(the provisions of 10.9.3 allow a qualified exemption to this requirement)</i></p> <p><i>(ii) Indigenous ecosystems within the Forest Management Unit that border areas to be harvested in the first 5 years shall be identified and protected from the date of certification.</i></p>	<p>Question whether the verifiers are needed as they reflect the Indicator terminology.</p> <p>If it meets the Forest Accord, it is a reserve area.</p>
<p>Indicator 6.4.2</p>	

Current Wording	Audit comments
<p>An evaluation of the MU reserves areas within the certified forest has been progressively undertaken incorporating a coarse and final level assessment, to identify ecosystem values present and priorities for management.</p> <p>Verifiers</p> <p>A coarse assessment of existing data is compiled to enable prioritising areas within the FMU for protection and management. The coarse assessment incorporates a desk top assessment of existing information to identify:</p> <ul style="list-style-type: none"> • broad vegetation types and fauna present within existing reserves • distribution and movement patterns of known poorly represented, threatened or endangered species • any known or likely threats to the ecological values present. <p>The relative rarity of ecosystem types present through an evaluation of:</p> <ol style="list-style-type: none"> i. Original (pre-Māori where this can be easily determined, alternatively pre-European)) percentage of ecosystem type in Ecological District , Lenz 3 domain or equivalent ,within which the certification occurs ii. Percentage of original ecosystem area that retains some indigenous vegetation under some form of protection. iii. Proportion of original ecosystem under protection by certificate holder in reserve areas. <p>ML Comprehensive ‘fine level’ evaluations have been progressively undertaken appropriate to scale for known poorly represented ecosystems where harvesting operations adjoining the area are scheduled to occur within the next 5 years. The purpose of this evaluation is to determine viability and establish specific management requirements of poorly represented areas. The fine level evaluation will include an on the ground assessment of:</p>	<p>This is OK</p> <p>The way these verifiers are written will make it very difficult to understand and audit. It will take a considerable amount of time to verify what the certificate holder has done, and the justification for it. It becomes a detailed ecological exercise.</p> <p>The SLIMF verifier is ideal.</p>

Current Wording	Audit comments
<ul style="list-style-type: none"> • Vegetation types present and condition • fauna present and known habitat requirements and relationships • rare, threatened, or endangered species distributions, habitat and ranges • focal, indicator or umbrella species • seral stages and ecotones • micro-landscapes, particular physical features, and landforms • any evidence of threats to ecosystem values present, such as animal pest damage or invasive plant pests. • The benefit of expanding the area of a reserve to secure the viability of the ecosystems; guided by the following site criteria: <ul style="list-style-type: none"> i. biologically viable shape and size ii. socially and economically logical iii. suitable for restoration to habitat for species being considered iv. links to other reserve area v. buffering from adjoining land uses, pests and disturbance event like fire and wind. <p>SLIMF: An evaluation of the potential for expansion of the reserve has been completed, guided by the criteria: biological viability, landscape connectivity, economic feasibility.</p>	
<p>Indicator 6.4.3</p> <p>The certificate holder has in place a programme of active management and, where appropriate, restoration and /or expansion of reserve areas.</p>	<p>Difficult to audit “active management & restoration”.</p> <p>Are there national guidelines for this?</p>

Current Wording	Audit comments
<p>Verifiers</p> <p>a. <i>Priorities for reserve management, restoration and expansion have been identified through the reserve evaluation process (6.4.2) and guidance provided to ensure the maintenance of the biodiversity in the reserves. This shall be guided by</i></p> <p style="padding-left: 40px;"><i>(i) Need to maintain the inherent biodiversity of the reserve area</i></p> <p style="padding-left: 40px;"><i>(ii) Rarity of the ecosystem.</i></p> <p style="padding-left: 40px;"><i>(iii) Statement of national priorities for protecting rare and threatened native biodiversity on Private Land.</i></p> <p>b. <i>Based on assessed priorities, appropriate plant and animal pest control is progressively undertaken to the assessed level.</i></p> <p>c. <i>Based on assessed priorities active restoration has been implemented within reserve areas where appropriate. The primary criteria being whether the active restoration would significantly increase the survival of any threatened species within the reserved area.</i></p> <p>d. <i>Based on assessed priorities expansion has been undertaken at harvest times.</i></p>	<p>Verifiers really confuse the situation, partly providing guidance.</p>
<p>Indicator 6.4.4</p> <p>The network of reserve areas may include areas set aside to fulfil other objectives such as riparian reserves, special physical features,</p>	<p>This is auditable, however, it may be best included in 6.4.1</p>

Current Wording	Audit comments
<p>cultural and amenity sites, stabilisation of unstable terrain or visual management zones provided the reserve area contains viable representative samples of indigenous ecosystems (or is under restoration to achieve this) and is meeting biodiversity protection objectives.</p> <p>Verifier</p> <p><i>a. Areas reserved for multiple purposes have those purposes recorded.</i></p>	
<p>Indicator 6.4.5</p> <p>Road building and tracking shall be prohibited in reserve areas, except where these activities are part of a documented habitat restoration plan designed to meet the objectives of the reserve area, or where it can be demonstrated that this is the best environmental solution to an access issue.</p> <p>Verifier</p> <p><i>Any roads and tracks within reserve areas are documented in management plans with their purpose and justification.</i></p>	<p>OK – looking for net environmental benefit.</p>

Current Wording	Audit comments
<p>Indicator 6.4.6</p> <p>Low impact use of reserve areas, such as cultural harvests and accessing of waahi tapu, backcountry recreation, eco-tourism, hunting, trapping or fishing are acceptable activities in reserve areas, if it can be shown the activity is compatible with the [ecological] management objectives of the area.</p> <p>Verifier</p> <p>Other uses of reserves are documented including any extra management actions that are necessary to maintain the integrity of the ecosystem. This may include restrictions of access or education programs. Where access cannot be restricted to achieve a goal this is documented.</p>	<p>OK</p>

Current Wording	Audit comments
<p>Results for Pan Pac: Documentation and observations showed the Company's commitment to the protection of indigenous areas of regional and national significance.</p>	
<p>Criterion 6.5: Written guidelines shall be prepared and implemented to: control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and protect water resources.</p>	
<p>Indicator 6.5.1</p> <p>Forest, environment and/or harvest management plans and Decision Support Systems appropriate to the scale and intensity of operation shall be progressively prepared prior to the commencement of works.</p>	<p>OK</p>

Current Wording	Audit comments
<p>Verifier</p> <p><i>Documents (such as harvest plans, Decision Support Systems, resource consent applications, contracts), appropriate to the scale and intensity, environmental sensitivity, and impact of the operations, exist that identify:</i></p> <ul style="list-style-type: none"> • <i>The operation</i> • <i>Potential impacts</i> • <i>Methods to avoid, remedy and mitigate impacts</i> 	
<p>Indicator 6.5.2</p> <p>Forest maps are progressively prepared that identify important issues</p>	<p>How to audit important issues</p>
<p>Indicator 6.5.3</p> <p>Requirements to avoid, remedy or mitigate impacts are identified in prescriptions.</p> <p>Indicators 6.5.1-6.5.3 shall be met if a resource consent for soil disturbance and/or vegetation removal has been obtained or the operation complies with the permitted activity requirements of Regional and District Plans and the council checks compliance to its satisfaction</p>	<p>OK. ECoP again</p>

Current Wording	Audit comments
<p>In high risk areas the certificate holder will operate a Decision Support System to guide forest management</p>	
<p>Results for Pan Pac: Forestry operations are based on Best Management Practices. Written guidelines are provided for contractors and staff. Operational mapping is of a high standard and is continually updated to reflect new data. Harvest planning prescriptions, notes and checklists are of a high standard. Post operation audit checklists (POAC) identify problems to be remedied.</p> <p>Waterways are identified within the GIS and are marked on the on operational maps provided to the contractors. Operational protocols around waterways and wetlands are of a very high standard. The Company monitors the effects of forestry operations on stream quality.</p> <p>Well defined emergency protocols are in place. All contractors interviewed were aware of their obligations and report procedures in the event of an emergency. All sites visited were free of fuel spills.</p> <p>SA 2009: The Forest Operation Handbook is being updated.</p> <p>Operational planning allows for feedback from contractors and staff, and for modification through site knowledge. This approach ensures that all hazards/impacts are identified and allows ownership of the operation.</p>	
<p>Criterion 6.6: Management systems shall promote the development and adoption of environmentally-friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organisation Type 1A and 1B chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p>	
<p>Indicator 6.6.1</p> <p>Certificate holders show a commitment to the goal of avoidance and minimisation of chemical pesticide use and the promotion of environmentally optimal methods of pest management. Methods of pest</p>	<p>All the requirements seem to be here, but the order is not logical from an audit process perspective. Suggest a re-order:</p> <p>The list of pesticides used and active ingredient – 6.6.3 Verifier.</p>

Current Wording	Audit comments
<p>management shall be undertaken in accordance with 10.7</p> <p>Verifiers</p> <p>a) Certificate holders shall participate in research to investigate means to avoid and reduce the volume and/or adverse effect of chemical usage.</p> <p>b) Certificate holders will work with the Chemicals Standing Committee to meet their obligations under 6.6</p>	<p>Prohibited pesticides are not used except..- 6.6.2;</p> <p>Where pesticides are used, there is a strategy to reduce use – 6.6.1, 6.6.4;</p> <p>Where pesticides are preferred, consider alternatives – 6.6.4;</p> <p>Comply with legislation – 6.6.5, 6.6.6, 6.6.7, 6.6.8, 6.6.9, 6.6.10</p>
<p>Indicator 6.6.2</p> <p>Certificate holders shall not use the chemicals listed in Annex 6.1 (see at the end of the document) within the Forest Management Unit. Use of chemicals listed in Annex 6.1 may be undertaken where either a written exemption has been obtained from the FSC International Board or in the case of environmental and/or national emergency such as infestations of plant and animal including insect, pests, fungal diseases, or dramatic changes in vegetation composition which threaten ecological stability or economic viability and which cannot feasibly be controlled by conventional means. In these cases, the use of chemicals may be required by law, and prohibitions may be temporarily suspended, except for pesticides with high persistence, strong biomagnification or carcinogenicity.</p> <p>Verifier</p> <p>a) Demonstrate by means of records of chemical pesticide use and/or contractual arrangements with spraying contractors.</p>	

Current Wording	Audit comments
<p>Indicator 6.6.3</p> <p>Use of those chemical pesticide formulations not specified in Annex 6.1 is permissible within the Forest Management Unit subject to compliance with verifiers 6.6.3a. 1 – 6.6.3b.</p> <p>Verifiers</p> <p>a) There are records of chemical pesticide formulation and volume used.</p> <p>b) Each of the chemical pesticide formulations used is justified for use based upon a documented comparative analysis of alternative chemical and non-chemical means of achieving the required result. The certificate holder's avoidance or minimising of chemical pesticide use shall be demonstrated by a documented yearly review of a certificate holders chemical use to ensure compliance with any formally notified revision of Annex 6.1 by the Chemical Standing Committees.</p>	
<p>Indicator 6.6.4</p> <p>The use of reduced chemical and non-chemical methods shall be encouraged.</p> <p>Verifier</p> <p>Demonstrate participation in research/trials related to reduced chemical and non-chemical pest management. This can include but is not restricted to participation in research and investigations initiated according to priorities</p>	

Current Wording	Audit comments
established by the Chemical Standing Committee.	
<p>Indicator 6.6.5</p> <p>There is compliance, including documentation where required, with NZ8409:2004 Management of Agrichemicals (or updates).</p>	
<p>Indicator 6.6.6</p> <p>There is compliance with local authority and other regulatory authority requirements in relation to application.</p>	
<p>Indicator 6.6.7</p> <p>Relevant contracts (eg. chemical application) contain provisions covering the use of agrichemicals, in accordance with NZS8409:2004 Code of Practice for the Management of Agrichemicals.</p>	
<p>Indicator 6.6.8</p> <p>Managers, employees and contractors understand relevant requirements in relation to the use of agrichemicals.</p>	
<p>Indicator 6.6.9</p> <p>There are emergency procedures for clean up following chemical spillages.</p>	

Current Wording	Audit comments
<p>Indicator 6.6.10</p> <p>GrowSafe or equivalent NZQA Unit Standard certificates for applicators and other certification is current.</p>	
<p>Results for Pan Pac: The company supplies chemical MSD sheets with the prescriptions, as well as weather forecast maps, detailed maps of the area to be sprayed and specific concentrations for each site. All operators have the necessary certification for chemical application; copies are held by the appropriate Pan Pac staff. Spraying operations are monitored on site by the forest manager, and from data supplied by the helicopter operator.</p> <p>Pan Pac chemical control operators carry spill kits during operations.</p> <p>The company has developed effective, integrated pest and weed control strategies and has investigated cost-effective alternatives to reduce the need for future spot spraying operations.</p> <p>SA 2009: The company has reviewed its IPMS. The company complies with the conditions of derogation for Terbutylazine and Hexazinone.</p>	
<p>Criterion 6.7: Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</p>	
<p>Indicator 6.7.1</p> <p>There is compliance, including documentation where required, with NZ8409:2004 Management of Agrichemicals.</p>	<p>OK</p>
<p>Indicator 6.7.2</p> <p>Documentary evidence of a request to chemical suppliers and/or applicators requiring in descending order of preference that agricultural chemical containers be re-used, recycled or triple rinsed prior to</p>	<p>Difficult to audit. What does this mean?</p>

Current Wording	Audit comments
disposal to an approved facility. Where re-use or alternatively recycling is not occurring, the reason/s for the current practice shall be progressively documented.	
<p>Indicator 6.7.3</p> <p>A procedure or contractual obligation for the recovery and recycling or appropriate disposal of used hydro-carbons shall be produced.</p>	OK
<p>Indicator 6.7.4</p> <p>Documentary evidence of contractual obligations and/or procedures for the training of staff in chemical spill response will be available. The contractual obligation or procedure will detail:</p> <ul style="list-style-type: none"> • Siting of chemical pesticide storage in a manner facilitating recovery in the event of a spill. • Materials and equipment required on site in the event of a spill. • Procedures for containment and recovery of spilled chemical pesticides. • Safe storage, transport and eventual recycling/disposal of recovered chemical pesticide. • Those requiring notification in the event of a spill and means by which they may be contacted. 	OK
<p>Results for Pan Pac: All sites visited had facilities for rubbish and waste products. Operational areas were visibly free from rubbish, wire rope, and discarded fuel and oil containers.</p>	

Current Wording	Audit comments
<p>Forest managers have investigated the opportunities for recycling of waste products. Where this is not possible, waste is disposed off with the least impact on the environment.</p>	
<p>Criterion 6.8: Use of biological control agents shall be documented, minimized, monitored and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</p>	
<p>Indicator 6.8.1</p> <p>Use of biological control agents shall be restricted to those approved for use and release under the Hazardous Substances & New Organisms Act. Any use or release shall be in strict accordance with the conditions placed on such use or release by the Environmental Risk Management Authority.</p>	<p>OK</p>
<p>Indicator 6.8.2</p> <p>If biological control agents are used, comprehensive records of use are maintained by the forest manager, and the impacts of such use are closely monitored.</p>	<p>OK</p>

Current Wording	Audit comments
<p>Indicator 6.8.3</p> <p>Field use of genetically modified organisms by the certificate holder is prohibited.</p>	<p>OK</p>
<p>Results for Pan Pac: Any introductions of bio-control agents is restricted and only released under government approval. The company has no involvement in research or use of Genetically Modified Organisms.</p>	
<p>Criterion 6.9: The use of exotic species shall be controlled and actively monitored to avoid adverse ecological impacts.</p>	
<p>Indicator 6.9.1</p> <p>Certificate holders shall comply with any applicable regional pest management strategy where this identifies a wilding species as a pest</p>	<p>OK</p>
<p>Indicator 6.9.2</p> <p>Certificate holders shall have in place a Wilding Prevention Decision Support System and prior to planting use this to assess the risk of wilding spread. Where the risk is significant the certificate holder will not plant without implementing appropriate ongoing control procedures.</p>	<p>OK – but planting what?</p>
<p>Indicator 6.9.3</p>	

Current Wording	Audit comments
<p>In the absence of a species being identified in the regional pest management strategy, the certificate holder shall remove 'wildings' in adjoining properties before seed production where:</p> <ul style="list-style-type: none"> • the adjoining property owner is agreeable to any wilding control activities required on his or her land, and • wildings are clearly identified as the progeny of species planted within the management unit area; and • wilding spread has occurred from management units after the Standard becomes operative or from first certification 	<p>OK</p>
<p>Results for Pan Pac: Pan Pac has 3 main exotic conifer species planted: <i>Pinus radiata</i>, <i>P. contorta</i> and Douglas fir. Some Eucalyptus have also been planted. Through indigenous area monitoring and a <i>contorta</i> surveillance programme, the company is able to maintain a record of wilding spread throughout their estate.</p>	
<p>Criterion 6.10: Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</p> <ul style="list-style-type: none"> • Entails a very limited portion of the forest management unit; and • Does not occur on high conservation value forest areas; and • Will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit. 	
<p>Indicator 6.10.1</p> <p>Conversion of the following areas to plantation forestry shall not be permitted:</p> <ul style="list-style-type: none"> • Any area of 5 hectares or greater which has an actual or emerging predominance of naturally occurring indigenous tree species of any 	<p>OK – this seems to re-state the Forest Accord</p>

Current Wording	Audit comments
<p>height. For the purposes of this clause an indigenous tree species is defined as any woody plant which ultimately forms part of the canopy of a naturally occurring forest or any indigenous tree species that attains a diameter at breast height of 30cm or greater.</p> <ul style="list-style-type: none"> • Any natural indigenous forest vegetation of between 1 and 5 hectares in area with an average canopy height of at least 6 m which is practical to protect. This recognises that in some instances some small pockets of native vegetation within a plantation forest management area cannot practically be protected from disturbance. However, viable stands will be excluded from clearance and every reasonable effort made to ensure such areas are not damaged in subsequent forestry operations. • Any vegetation recommended for protection in a survey report in the Protected Natural Areas Programme or classified as a Site of Special Wildlife Interest (SSWI) in a published report of the former Wildlife Service. • Significant Natural Areas (Areas recognised as significant indigenous vegetation or significant habitats of indigenous fauna) as defined in an operative District Plan under the Resource Management Act 1991. • Indigenous habitat of poorly represented, threatened or endangered species. • Geopreservation Sites as listed in the Geopreservation inventory. • Wetlands (as defined in the Resource Management Act 1991) • Indigenous forested riparian margins. • Dunelands where the primary vegetation is indigenous. • Geothermal areas where there are indigenous plant communities adapted to geothermal conditions. • Where conversion is from a management unit to another land use then refer to 5.6.3. Areas of forest subjected to natural destruction such as windthrow or fire which are not immediately replanted, but a held over until the remaining or adjacent areas are harvested then 	

Current Wording	Audit comments
<p>replanted are exempt (i.e. in these cases the areas destroyed may develop natural vegetation, but remain a management unit forest).</p>	
<p>Indicator 6.10.2</p> <p>The following lands shall not be considered for conversion to plantation forestry unless consultation is undertaken with interested parties to the National Initiative. Where a resource consent is required under the Resource Management Act consultation can be undertaken by that process.</p> <ul style="list-style-type: none"> • High Country tussock scrublands or herbfields as defined in MfE's LENZ publication and repeated in Annex 6.10. • Coastal scrub and coastal herbfields with an indigenous plant content of greater than 30% within the area being considered 	<p>OK</p>
<p>Results for Pan Pac: The Company does not convert indigenous cover or other important conservation areas to plantation forest.</p>	

Principle 7: Management Plan

A management plan - appropriate to the scale and intensity of the operations - shall be written, implemented, and kept up to date. The long term objectives of management, and the means of achieving them, shall be clearly stated.

Current Wording	Audit comments
<p>Criterion 7.1: The management plan and supporting documents shall provide:</p> <ul style="list-style-type: none">a) Management objectives.b) Description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.d) Rationale for rate of annual harvest and species selection.e) Provisions for monitoring of forest growth and dynamics.f) Environmental safeguards based on environmental assessments.g) Plans for the identification and protection of poorly represented, threatened and endangered species.h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.i) Description and justification of harvesting techniques and equipment to be usedj) Decision Support Systems	
<p>Indicator 7.1.1</p> <p>There is a management plan (or overview linking different planning activities). Planning includes short (operational), medium (tactical) and long (strategic) term plans, appropriate to the scale of the</p>	<p>The first sentence is OK. The last 2 sentences are not required in this Indicator.</p>

Current Wording	Audit comments
Management Unit. The requirement for documented planning in small-scale operations will be decided by the scale, duration and intensity of the operation.	
<p>Indicator 7.1.2</p> Management objectives are described (See also Criterion 1.6)	OK
<p>Indicator 7.1.3</p> Forest resources, environmental limitations, land use and ownership status, socio-economic conditions, and adjacent lands (see also Criterion 5.5) are described.	This is difficult to audit. The first 4 factors are OK, but it is difficult to audit the last 2. Recommend removal.
<p>Indicator 7.1.4</p> A rationale for the rate of harvest and species selection is provided (see also Criterion 5.6).	OK
<p>Indicator 7.1.5</p> Provisions for monitoring forest growth and dynamics are described (see also Criterion 8.2).	OK
<p>Indicator 7.1.6</p> Environmental safeguards are described (see also Criteria 6.1, 9.3)	This may need some explanation to ensure consistency.
<p>Indicator 7.1.7</p>	

Current Wording	Audit comments
Plans for identification and protection of poorly represented, threatened and endangered species are described (see also Criteria 6.2, 6.3, 6.4, 9.3)	This means that the FMP describes the location of the main plans, not a replication of them.
<p>Indicator 7.1.8</p> <p>There are maps showing the forest resource base including reserve areas, planned management activities and land ownership</p>	This is the minimum requirement
<p>Indicator 7.1.9</p> <p>Harvesting techniques and equipment are described and justified</p> <p>Verifier</p> <p>There are plans for all harvest settings containing sufficient detail, related to the scale and level of operational difficulty, so that environmental and safety risks are identified and addressed.</p>	<p>This is difficult to audit. Does each piece of harvesting equipment need to be described? Does each contractor need to justify the equipment?</p> <p>I recommend that the verifier be used as the Indicator.</p>
<p>Indicator 7.1.10</p> <p>Planning includes short (operational), medium (tactical) and long (strategic) term plans.</p>	This Indicator was put back in to take it out of 7.1.1.
<p>Indicator 7.1.11</p> <p>The plan is being implemented and any significant deviation is adequately justified.</p>	This is difficult to audit. The intent is not clear.

Current Wording	Audit comments
<p>Indicator 7.1.12</p> <p>The management plan or supporting documents shall include a description of the silvicultural regimes with information gathered through resource inventories (see also Criteria 5.6, 6.3, 8.1, 8.2)</p>	<p>The intent is not clear. The inclusion of silvicultural regimes is OK, but the link to resource inventories is unclear. Do you mean Quality Control?</p>
<p>Indicator 7.1.13</p> <p>The objectives of management shall include, inter alia, conservation or restoration of native forest within the FMU (see also Criteria 5.5, 6.2)</p>	<p>OK</p>
<p>Results for Pan Pac: The management plan overview contains links to other detailed management plans. Objectives for each type of operation are clearly defined. An "Ecological Management Plan" has been developed to provide an integrated approach to managing all ecological related aspects. The plan also ranks the environmental impacts of each of their operations (e.g. harvesting, roading, silviculture, burning). Harvest planning goes from 30-60 years to 5 years to annual and then revised during the year to produce 13-week plans. Harvesting plans address the technical issues of the site, soil management and all the foreseen environmental issues.</p>	
<p>Criterion 7.2: The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic considerations.</p>	
<p>Indicator 7.2.1 ML</p> <p>Staff members with responsibility for the overall compilation and updating of the management plan are identified.</p>	<p>OK</p>
<p>Indicator 7.2.2</p> <p>There are procedures for incorporation of monitoring data into the</p>	<p>OK</p>

Current Wording	Audit comments
management planning process	
<p>Indicator 7.2.3 ML New scientific and technical developments are evaluated and incorporated into revised plans</p>	<p>This is difficult to audit against because of the long time frames involved. New wording around participation in research would help.</p>
<p>Indicator 7.2.4 Revised plans respond to changing environmental, social and economic considerations</p>	<p>Difficult to audit as the intent of the Indicator is unclear.</p>
<p>Indicator 7.2.5 A timetable for the periodic revision of the management plan is adhered to</p>	<p>Difficult to audit as it assumes there is a timetable.</p>
<p>Results for Pan Pac: There are clearly defined responsibilities for compiling and updating the various management plans. The production management plan is revised before the annual valuation exercise.</p> <p>The Company belongs to three research cooperatives and obtains data from DOC to incorporate into plan updates. New production information is incorporated into management plans. Data from water monitoring sites and research into RTE species such as falcon and kiwi are used to provide guidelines for the forestry operations.</p> <p>There is evidence of changing social (cultural) conditions being implemented, e.g. Karakia (prayer) before newly clear felling a block, a forest name change to the original (indigenous) name.</p>	
<p>Criterion 7.3: Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan.</p>	

Current Wording	Audit comments
<p>Indicator 7.3.1ML Staff members with responsibility for training are identified</p>	<p>Difficult to audit. Is this for all training? Contractors may have the responsibility for training their staff.</p>
<p>Indicator 7.3.2 Forest workers at all levels (including contractors) have adequate training (including the health and safety issues and environmental aspects) to ensure the management plan is implemented</p>	<p>OK</p>
<p>Indicator 7.3.3 There are procedures for assessing the effectiveness of the training</p>	<p>This is difficult to audit. The intent is unclear. Training for whom?</p>
<p>Indicator 7.3.4 Supervisory staff (including contractors) have adequate training and resources</p> <p>Verifier</p> <p>All activities are supervised and monitored sufficiently to ensure that standards and procedures are adequately implemented.</p>	<p>The Indicator is unclear & difficult to audit. The verifier is a better Indicator & should be used.</p>
<p>Results for Pan Pac: Company staff have training and qualifications in forestry. Skill and experience levels are very high. All contractors and their staff are trained for the task. Contractors are being encouraged to undertake extra training and gain extra qualifications. Database, training plans and records of learning were sighted. A Forest Industry Trainer was at one of the sites during a field visit. Contractors confirmed that supervisors visit 2-3 times per week, and stated their appreciation of the frequent contact.</p>	

Current Wording	Audit comments
<p>Indicator 7.4.1</p> <p>There are publicly available statements that provide an up-to-date summary of the primary management plan elements listed in 7.1</p> <p>Verifier “Available” means evidence that it is available for inspection during normal office hours at the certificate holder’s principal office; or on an internationally accessible website</p>	<p>The Indicator is OK.</p> <p>The verifier should go into the Glossary of Terms.</p>
<p>Indicator 7.4.2</p> <p>The summary shall have a specific section on the presence of High Conservation Values within the FMU and measures that are being taken to maintain or enhance those values.</p>	<p>OK</p>
<p>Results for Pan Pac: The public statements are in the management plan summary, which is available on the company web site.</p>	

Principle 8: Monitoring and Assessment

Monitoring shall be conducted - appropriate to the scale and intensity of forest management - to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts

Current Wording	Audit comments
<p>Criterion 8.1: The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations as well as the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</p>	
<p>Indicator 8.1.1</p> <p>The certificate holder maintains a monitoring plan that describes:</p> <ul style="list-style-type: none"> • Elements to be monitored; • Monitoring indicator(s) for each element; • Rationale for the selection of each element and monitoring Indicator(s); • Consistent and replicable monitoring procedures; • The frequency and intensity of monitoring, consistent with the nature of the monitoring indicator(s), management activities, environmental sensitivity of the site, assessed risks, stakeholder concerns, performance history and changing environmental conditions; and, • Relevant baseline information 	<p>OK</p>
<p>Indicator 8.1.2</p>	

Current Wording	Audit comments
Persons responsible for implementing and maintaining monitoring programs are identified.	OK
<p>Indicator 8.1.3</p> <p>The monitoring plan is periodically reviewed and available to those doing the monitoring or working with monitoring data.</p>	Difficult to audit as the intent is unclear.
<p>Indicator 8.1.4</p> <p>A clear link between the monitoring plan and the management plan is established.</p>	Difficult to audit as the intent is unclear.
<p>Results for Pan Pac: There is a selection of documented monitoring programmes. The frequency and intensity of the monitoring is stated and is specific for individual variables. Data is readily available and easily interpreted.</p> <p>The audit of operations through the POAC process is designed for third party monitoring.</p> <p>Pan Pac complies with, and in some areas leads, industry best practice for production monitoring. It has carried out literature research into the correct procedures and methodology required for their monitoring programmes and implemented them accordingly.</p>	
<p>Criterion 8.2: Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:</p> <ul style="list-style-type: none"> a) Yield of all forest products harvested; b) Growth rates, regeneration and condition of the forest; c) Composition and observed changes in the flora and fauna; d) Environmental and social impacts of harvesting and other operations; e) Costs, productivity, and efficiency of forest management 	

Current Wording	Audit comments
<p>Indicator 8.2.1 Yields of all forest products harvested are recorded</p>	<p>OK</p>
<p>Indicator 8.2.2 Data are collected on growth rates, regeneration and condition of the commercially productive area</p> <p>Verifiers There is evidence of permanent sample plots, reconciliation of actual volumes against inventory data.</p>	<p>OK</p> <p>The second part of the verifier belongs in 8.2.1</p>
<p>Indicator 8.2.3 Data are collected on the composition and observed changes in the flora and fauna and the effectiveness of conservation activities</p> <p>Verifier The monitoring program shall be sufficient to identify unusual mortality, disease, insect outbreaks or adverse ecological impacts related to the planting of exotic species within the FMU.</p> <p>SLIMF Verifier: The Forest Manager shall keep notes of the presence of any notable species of flora or fauna, sufficient to identify significant trends over time.</p>	<p>This needs to be more specific. The mention of conservation activities in the Indicator appears to be over-ridden by the verifier.</p>

Current Wording	Audit comments
<p>Indicator 8.2.4 ML Environmental and social impacts of forest operations, including health and safety, are monitored</p> <p>Verifier</p> <p>a) Appropriate to the scale and intensity of the operations the environmental and social impacts to be monitored are:</p> <ul style="list-style-type: none"> • Direct and indirect employee numbers • Health & Safety statistics • Number of visitor days • Number of access permits issued • Numbers of requests for access <p>Indicator 8.2.4 S The Forest Manager shall be able to identify any significant environmental impacts of harvesting and is aware of the social impacts of operations and mitigate these where they are negative.</p>	<p>OK</p> <p>The last verifier may be difficult to audit. The intent is unclear.</p> <p>OK</p>
<p>Indicator 8.2.5 Post-harvest monitoring is carried out to assess waste and damage to the site</p> <p>Verifier</p> <p>For medium and large scale operations this monitoring shall be documented</p>	<p>OK</p> <p>Have these been defined? This should be the case for all Certified</p>

Current Wording	Audit comments
	operations, regardless of scale.
<p>Indicator 8.2.6 Data are collected on costs, productivity and efficiency of forest management</p> <p>Verifier The forest enterprise meets Criteria 5.1, 5.2, 5.4, and 5.5 for economic indicators</p>	<p>This is difficult to audit as the intent is unclear.</p> <p>The intent of the verifier is also unclear.</p>
<p>Indicator 8.2.7 Contractors' performance is monitored, including compliance with contract specifications</p>	OK
<p>Indicator 8.2.8 The forest enterprise shall have a documented programme for collecting data sufficient to demonstrate the maintenance (or otherwise) of any High Conservation Values (see Criterion 9.1.1, 9.1.2) within the FMU.</p>	OK
<p>Results for Pan Pac: Harvesting contractors report production weekly. This information is used to reconcile log docket.</p> <p>The forest resource is checked: after planting, after final silviculture operations (both formal quality control), mid rotation inventory and pre harvest inventory. A series of Crop Type yield tables has been built up. The GIS mapping complements the inventory.</p> <p>"Indigenous Area Monitoring" system allows for data collection on the changes occurring over time to species of general conservation concern; it has shown that regeneration at the Burbury Road indigenous area has improved since 2002.</p> <p>Data on the number of wild mammals killed in each forest is collected on a monthly basis and results are publicised in an internal newsletter.</p>	

Current Wording	Audit comments
<p>Formal post-harvest audit is undertaken to ensure that all points in the prescription and planning notes have been covered. The supervisor and contractor sign off. This check sheet may be audited by the forest coordinator as part of the 10% audit of POACs.</p> <p>The Company maintains a record of each operation, its costs and how it was carried out. These costs are analysed and used for future budgets.</p> <p>The Forest Manager undertakes the final audit of contractors' harvesting operations. A third party is involved in auditing 10% of all other operations performed.</p> <p>Two workforce surveys have been undertaken.</p> <p>SA 2009: A further workforce survey has been undertaken in readiness for any Treaty of Waitangi settlement discussions.</p>	
<p>Criterion 8.3: Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the “chain of custody”</p>	
<p>Indicator 8.3.1</p> <p>There shall be a system in place which allows all products (timber and non-timber) harvested within the FMU to be readily identified as such, from the time of harvesting through to the point of sale.</p>	<p>OK – from FSC 60-004. This should be documented.</p>
<p>Indicator 8.3.2</p> <p>The identification system shall allow the physical products to be linked to paper records including all of the following information:</p> <ul style="list-style-type: none"> • Type of product • Volume (or quantity) of product; • Logging/production site • Logging/production date 	<p>OK but should include the Certificate number and the words FSC Pure.</p> <p>In New Zealand we can be specific and say the docket book system</p>

Current Wording	Audit comments
<p>Indicator 8.3.3</p> <p>The forest enterprise shall keep sales invoices for all products sold, which identify at least:</p> <ul style="list-style-type: none"> • Name and address of purchaser • The date of sale • Type of product • Volume (or quantity) sold. 	<p>Not only sales invoices but also records of total quantities of all products sold, including quantities sold to Chain of Custody certificate holders.</p>
<p>Indicator 8.3.4</p> <p>All products sold as “FSC Certified” shall be readily identifiable both on the product and on the accompanying paper records and sales invoices.</p>	<p>Need a reference to the FSC certificate number.</p>
<p>Indicator 8.3.5</p> <p>The forest enterprise shall keep copies of production records and sales invoices for at least five years.</p>	<p>OK</p>
<p>Nothing in the draft standard about Trademark</p>	<p>Suggest: “An Agreement with FSC has been signed. Use of the Trademark is in accordance with the signed Agreement.”</p>

Current Wording	Audit comments
<p>Results for Pan Pac: Logs leaving Pan Pac forests have the Pan Pac logo stencilled on them. They are accompanied by a load docket indicating the Forest, Compartment and Crew. Logs from non-Pan Pac forests are accompanied by a different docket. Sales invoices contain the correct FSC certificate number in the correct format. The invoice also states that “these products are supplied from FSC Accredited forests”.</p>	
<p>Criterion 8.4: The results of monitoring shall be incorporated into the implementation and revision of the management plan</p>	
<p>Indicator 8.4.1 Records of monitoring activities are kept.</p>	<p>Yes, but.</p>
<p>Indicator 8.4.2 ML The results of research and monitoring programmes are regularly analysed.</p>	<p>Why not include this with the Indicator above to make a meaningful Indicator.</p>
<p>Indicator 8.4.3 ML The results of monitoring are incorporated into periodic reviews of the management plan, policy and procedures.</p>	<p>This is difficult to audit. There is no time scale given. There is an assumption (not good for audit) that the reviews will improve forest management – is that the case?</p>
<p>Results for Pan Pac: The Company belongs to three research cooperatives, and is able to incorporate appropriate research results into planning. The most recent example is with the use of selected clonal properties. Monitoring results are continually analysed. Use of monitoring data is apparent in areas of weed suppression and wilding control.</p>	
<p>Criterion 8.5: While respecting the confidentiality of information, forest managers shall make publicly available a summary</p>	

Current Wording	Audit comments
of the results of monitoring indicators, including those listed in Criterion 8.2.	
<p>Indicator 8.5.1</p> <p>There are publicly available statements summarising the results of monitoring</p> <p>Verifier “Available” means evidence that it is available for inspection during normal office hours at the certificate holder’s principal office; and on an internationally accessible website.</p>	<p>OK, but should recognise that some monitoring work may not be the Certificate Holder’s IP.</p> <p>Previous comments about defining Available in the Glossary.</p>
<p>Results for Pan Pac: Public summaries of monitoring results are available through the Company and via their newsletter.</p>	

Principle 9: Maintenance of high conservation value forests

Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach

Current Wording	Audit comments
Criterion 9.1: Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.	
<p>Indicator 9.1.1</p> <p>The forest enterprise shall carry out an assessment of the FMU sufficient to identify all parts of the FMU that have each of the following attributes:</p> <ul style="list-style-type: none">• HCV1. Forest areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).• HCV2. Forest areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.• HCV3. Forest areas that are in or contain poorly represented, threatened or endangered ecosystems.• HCV4. Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	OK

Current Wording	Audit comments
<ul style="list-style-type: none"> • HCV5. Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health). • HCV6. Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities). 	
<p>Indicator 9.1.2</p> <p>The forest enterprise shall clearly map all areas within the FMU which have each of the six attributes listed under Indicator 9.1.1.</p>	OK
<p>Indicator 9.1.3</p> <p>The forest managers shall have consulted with local stakeholders with relevant expertise or knowledge relating to each of the listed High Conservation Values in the identification of areas with those values within the FMU.</p>	OK
<p>Indicator 9.1.4 ML</p> <p>The assessment procedure and its results (including the comments and suggestions of stakeholders in response to consultation) shall be fully documented.</p>	OK
<p>Indicator 9.1.5 ML</p> <p>The results of the assessment shall have been reviewed by individuals with expert knowledge of the listed High Conservation Values and local knowledge of the area in which the FMU is located.</p>	OK

Current Wording	Audit comments
<p>Results for Pan Pac: The FMU has been independently assessed, and a variety of interested organisations, including the Department of Conservation and the Regional Council, have been consulted. No HCVPs have been identified.</p>	
<p>Criterion 9.2: The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p>	
<p>Indicator 9.2.1 The forest managers shall have consulted with local stakeholders with relevant expertise or knowledge on the management options to maintain or enhance the identified High Conservation Values within the FMU.</p>	<p>OK</p>
<p>Indicator 9.2.2 Stakeholders consulted with under Indicator 9.2.1 shall have subsequently received a copy of the Management Plan Summary document section referring to management of High Conservation Values, as referred to in Indicator 7.4.2, and shall have been invited to submit any further comments in respect of the proposed management.</p>	<p>OK</p>
<p>Indicator 9.2.3 The forest enterprise maintain shall a complete and up to date file of all stakeholder comments submitted in relation to its management of High Conservation Values.</p>	<p>OK</p>
<p>Results for Pan Pac: N/A</p>	
<p>Criterion 9.3: The management plan shall include and implement specific measures that ensure the maintenance and/or</p>	

Current Wording	Audit comments
<p>enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</p>	
<p>Suggested Indicators: See Indicators 6.1.6L, 6.1.6S, 7.1.10 and 7.4.2</p>	<p>These are available at least on the SGS Generic Standard.</p>
<p>Results for Pan Pac: N/A</p>	
<p>Criterion 9.4: Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</p>	
<p>Suggested Indicators: See Indicators 8.2.9L</p>	<p>These are available at least on the SGS Generic Standard.</p>
<p>Results for Pan Pac: N/A</p>	

Principle 10: Plantations

Plantations shall be planned and managed in accordance with Principles and Criteria 1 - 9 and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.

Current Wording	Audit comments
Criterion 10.1: The management objectives of the plantation, including natural forest conversion and restoration objectives, shall be explicitly stated in the management plan, and clearly demonstrated in the implementation of the plan.	
<p>Indicator 10.1.1</p> <p>Management planning shall identify the boundaries of the Forest Management Unit encompassed by the certificate, which includes the plantation forest plus any designated reserve areas and the requirements for protection of biodiversity shall be integrated into working documents.</p> <p>Verifiers</p> <p>a. Management plans showing the certificated area and designated production and reserve areas are produced.</p> <p>b. Requirements of this standard are integrated into management plans and work plans.</p>	<p>This Indicator does not address the Criterion, which calls for objectives.</p> <p>See SGS Generic Standard and SCS NZ Standard.</p>

Current Wording	Audit comments
<p>Indicator 10.1.2</p> <p>The management plan shall identify the boundaries of the Forest Management Unit encompassed by the certificate, which includes the plantation forest plus any designated reserve areas.</p>	<p>This could stay as it is a cut down version of the Indicator above.</p>
<p>Results for Pan Pac: The management objectives for the plantation are stated in the various management plans. The objectives are written in such a way that their attainment can be demonstrated. The evidence can be seen in management reports.</p>	
<p>Criterion 10.2: The design and layout of management units should promote the protection, restoration and conservation of natural forests, and not increase pressures on natural forests. Wildlife corridors, streamside zones and a mosaic of stands of different ages and rotation periods, shall be used in the layout of the management unit, consistent with the scale of the operation. The scale and layout of management unit blocks shall be consistent with the patterns of forest stands within the natural landscape.</p>	
<p>Indicator 10.2.1</p> <p>A network of Riparian Zones is to be progressively identified and protected within the Forest Management Unit. Riparian zones are to be identified on all waterbodies that have permanent water when forested or adjoining waterbodies greater than 3m wide and where possible are a minimum of 10m each side of the watercourse.</p> <p>Verifiers</p> <p>a. Riparian zones with existing indigenous vegetation greater than 20m wide on average, are identified and recorded from the date of certification.</p> <p>b. ML Management plans of indigenous riparian zones that</p>	<p>The intent of the Criterion seems to be the protection etc of natural forests, including riparian zones. This & the following Indicators concentrate on riparian zones to the exclusion of the other features listed in the Criterion.</p> <p>Is that what the SDG intended?</p> <p>The Indicator is difficult to interpret and therefore difficult to audit.</p>

Current Wording	Audit comments
<p>encompass the provisions of 6.4 and 10.2.1 are progressively prepared.</p> <p>c. ML All riparian zones (indigenous or mixed species) bordering areas due for harvest are mapped and management plans to protect the biodiversity are prepared before harvesting occurs.</p> <p>d. Any planting in new areas shall have riparian zones identified on maps before planting begins.</p>	
<p>Indicator 10.2.2</p> <p>No commercial planting shall be undertaken in Riparian Zones (10 metres either side of waterbodies that have permanent water when forested) except under the following conditions</p> <ul style="list-style-type: none"> (i) The certificate holder has a Decision Support System specified within the management plan that addresses temperature, sediment and nutrient conditions to maintain aquatic habitat, or (ii) Alternative species (other than radiata pine or Douglas-fir) may be grown in a riparian zone under a continuous canopy regime (coupe less than 0.2ha) providing aquatic habitat is not compromised. <p>Verifiers</p> <p>a. Where planting has been undertaken within a riparian zone evidence of the DSS is present or plans of the closed canopy harvest are available.</p>	<p>As above, this could be re-worded to cover natural forests.</p> <p>Also link to the ECoP.</p>

Current Wording	Audit comments
<p>Indicator 10.2.3</p> <p>No earthworks shall be undertaken within riparian zones except</p> <ul style="list-style-type: none"> (i) in association with designated stream crossings. (ii) maintenance of an existing road (iii) where a topographical constraint leaves no alternative for the formation of a road (iv) emergencies such as fire fighting – access to water or fire breaks <p>In any of these exceptions the instream values are to be protected.</p> <p>Verifiers</p> <ul style="list-style-type: none"> a. Earthworks within the riparian zone are recorded b. Where earthworks or roading occurs in the riparian zone evidence is available to show how the instream values are protected and how alternatives were considered. <p>(Nothing in 10.2.2 or 10.2.3 precludes the harvesting of management unit trees in the riparian zone that were planted prior to the standard coming into effect. Replanting shall comply with 10.2.2),</p>	<p>As above.</p> <p>Do you mean: Riparian zones are maintained along water courses and around water bodies?</p>
<p>Indicator 10.2.4</p> <p>Weed and pest control and restoration where appropriate is</p>	<p>As above. Pest control is important in all natural forest areas.</p>

Current Wording	Audit comments
<p>undertaken to protect terrestrial biodiversity in riparian areas.</p> <p>Verifiers</p> <p>a. <i>Weed and pest control is assessed and implemented when necessary to maintain the terrestrial biodiversity values of riparian zones particularly when harvesting is occurring adjacent to the riparian zone.</i></p> <p>b. <i>Where necessary active restoration of cut lines or encroachments into riparian zones is undertaken as soon as practical after harvest operations.</i></p> <p>c. <i>Where the riparian zone is recognised as a reserve under 6.2 or 6.4 then the requirements for weed and pest control, restoration and expansion are carried out.</i></p>	<p>Do the verifiers add anything?</p>
<p>Indicator 10.2.5</p> <p>The need for wildlife corridors for rare, threatened, and endangered species shall be assessed within the ecological landscape and managed appropriately.</p> <p>Verifiers</p> <p>a. <i>Wildlife corridors for rare, threatened and endangered species are identified on management maps.</i></p> <p>b. <i>Indigenous wildlife corridors shall be managed as reserve areas where necessary for the protection of rare, threatened, and endangered species as per the provisions of 6.2.</i></p> <p>c. <i>Wildlife corridors within production areas shall be detailed in</i></p>	<p>Is there a definition of “ecological Landscape”?</p> <p>Verifier b appears to be a good Indicator for this.</p>

Current Wording	Audit comments
<p>harvest plans with appropriate management actions considered which include:</p> <ul style="list-style-type: none"> (i) Planning of size and spacing of cut blocks to assist movement of indigenous species. (ii) Protection of species when discovered. 	
<p>Indicator 10.2.6</p> <p>Visual landscape objectives will be partly achieved through protection and management of indigenous ecosystems. Harvesting and planting will however still need to take account of the following potential additional visual impacts:</p> <ul style="list-style-type: none"> • <i>Roadside harvest on state highways or tourist highways</i> • <i>Significant natural features – vantage points</i> • <i>Backdrops to urban areas</i> • <i>Mana whenua perceptions of visual landscape</i> <p>Verifiers</p> <ul style="list-style-type: none"> a. <i>Planning of planting and harvesting has taken account of forestry impacts on the visual aspects of significant natural features, backdrops to urban areas, tourist and state highways and other issues of local significance. A willingness to negotiate solutions with the community of interest is to be demonstrated.</i> b. <i>A willingness to appreciate and negotiate solutions over mana whenua visual perceptions of the landscape is to be demonstrated.</i> c. <i>ML Visual landscape protection areas are documented on management plans. These may include indigenous reserve areas or low impact harvest amenity areas.</i> 	<p>Is there a definition of “visual landscape objectives”?</p> <p>This is a difficult Indicator to audit.</p>

Current Wording	Audit comments
<p>Results for Pan Pac: Natural vegetation areas, including riparian zones are identified, mapped and given a ranking. All such areas are automatically protected during operations. The most significant areas and streams are monitored as part of the monitoring programme.</p> <p>Reserve areas are protected. Where areas are to revert to non-production, the wildlife corridor benefits are considered as part of the decision process. An area above the Waipatiki camp ground has been restored to a natural vegetation area with the planting of indigenous species.</p> <p>Riparian zones are maintained, and enhanced where possible. There is evidence of allowing buffer zones to establish where the first rotation had been planted to the stream edge.</p> <p>Pan Pac forests are generally away from urban areas and state highways. One block, which could be seen from a main road, showed evidence of having landscape values taken into account in the harvesting plan.</p> <p>Complimentary comments about the company's riparian practices were received from the Regional Council.</p>	
<p>Criterion 10.3: Diversity in the composition of plantations is preferred, so as to enhance economic, ecological and social stability. Such diversity may include the size and spatial distribution of management units within the landscape, number and genetic composition of species, age classes and structures.</p>	
<p>Indicator 10.3.1</p> <p>Economic, ecological and social stability is achieved by one or more of the following:</p> <ul style="list-style-type: none"> • Maintaining production and reserve areas within the Forest Management Unit • Choosing a species mix which: <ul style="list-style-type: none"> ○ caters well to local conditions; or ○ enables the certificate holder to respond rapidly to changing market requirements, or ○ supplies a diversity of markets • Using a diversity of genotypes • Having a mix of age classes and/or rotation lengths • Using a variety of silvicultural regimes 	<p>Auditing the Indicator seems straightforward.</p> <p>The verifier is strange and could be removed.</p>

Current Wording	Audit comments
<ul style="list-style-type: none"> • Demonstrating an understanding of future market trends • Taking into account local markets/processors <p>Verifier</p> <p><i>Where certificate holders have only radiata pine and/or Douglas-fir they shall examine the social, environmental, and economic values of alternative species and establish plantings if appropriate based on these studies.</i></p>	
<p>Results for Pan Pac: Re-establishment is providing for genetic diversity through seed sources, but also in the variety of clones that perform better on some sites. Effects of clear cut size are being monitored mainly through water quality monitoring, and social impact.</p>	
<p>Criterion 10.4: The selection of species for planting shall be based on their overall suitability for the site and their appropriateness to the management objectives. In order to enhance the conservation of biological diversity, native species are preferred over exotic species in the establishment of plantations and the restoration of degraded ecosystems. Exotic species, which shall be used only when their performance is greater than that of native species, shall be carefully monitored to detect unusual mortality, disease, or insect outbreaks and adverse ecological impacts.</p>	
<p>Indicator 10.4.1</p> <p>Species shall be selected in accordance with criteria specified in 10.3</p> <p>Verifiers</p> <p><i>[certificate holders shall have access to information demonstrating that the environmental, social and economic performance of exotic species is greater</i></p>	<p>This does not mean very much.</p> <p>Do you mean: Selection of species, provenances and clones is based on documented trials that demonstrate their suitability to the site and management objective.</p>

Current Wording	Audit comments
<p><i>than indigenous species.] or</i></p> <p><i>[Appropriate to size and scale, operational scale trials of indigenous species are being carried out. This may be met by participating in a collaborative trial.]</i></p> <p><i>[Appropriate to size and scale, operational scale trials of exotic species other than radiata and Douglas-fir are being carried out. This may be met by participating in a collaborative trial.]</i></p>	
<p>Indicator 10.4.2</p> <p>Exotic species shall be monitored to detect unusual mortality, disease, or insect outbreaks and adverse ecological impacts</p> <p>Verifier</p> <p>a) <i>This standard may be met by taking part in NZFOA’s Forest Health Surveillance Programme or a similar programme</i></p>	<p>This is a NZ Standard. The verifier could be re-written to form part of the Indicator.</p>
<p>Indicator 10.4.3</p> <p>There shall be a procedure for reporting and responding to unusual events.</p>	<p>Again, this is a NZ Standard. Reference to knowledge of MAF Biosecurity or a National Incursion Plan is appropriate.</p>
<p>Results for Pan Pac: The Company works closely with research cooperatives on provenance and clone performance trials. A new trial was being installed during this (FSC) Assessment Exotic species outperform indigenous species on a production basis. Provenance, clone and seed source information is available and kept in the stand record system.</p>	
<p>Criterion 10.5: A proportion of the overall forest management area, appropriate to the scale of the plantation and to be determined in regional standards, shall be managed so as to restore the site to a natural forest cover.</p>	

Current Wording	Audit comments
<p>Indicator 10.5.1</p> <p>A minimum area of reserve set-asides equal or equivalent to 10% of the MU by Ecological District (or equivalent ecosystem characterisation at a similar scale such as LENZ III) will be managed to be protected and/or restored to natural vegetation over time.</p> <p>(i) <u>For calculation of the percentage reserve set-aside, the following areas may be included:</u></p> <ul style="list-style-type: none"> • Reserve areas set aside and managed under criteria 6.2 and 6.4. • Indigenous wildlife corridors and riparian zones as per 10.2. • Retired areas currently being restored to indigenous vegetation. Area x0.5 • To a maximum of 3% contribution, areas of management unit managed for continuous cover, single tree extraction or small coupe (0.5ha max). Pest and weed control plans must be prepared and implemented in these areas. Area x 0.5. • Waahi tapu and historic site areas also containing appropriate indigenous biodiversity values. <p>(ii) <u>When calculating the percentage reserve set-aside by Ecological District/or equivalent, adjustments may be made as follows, provided that the overall percentage of reserve set-aside in the FMU exceeds 10%:</u></p> <ul style="list-style-type: none"> • Outlying areas¹ of management unit where each is less than 50ha in any one Ecological District/or equivalent will be exempt from the 10% requirement in that ecological district. They will instead be combined with other MU areas in the adjacent ED/or equivalent; • Up to 3% may be made up from reserve areas within the MU located 	<p>This has now become a very complex situation where 1 Indicator in the SGS Generic Standard and 4 Performance Indicators in the SCS NZ Standard have been replaced in this Draft by 8 Indicators, each with a detailed and sometimes confusing intertwining of Indicators, notes and verifiers.</p> <p>Currently Certificate Holders have and protect what they have been given in the way of natural areas, separated out from areas of natural forest in 1987, arguably on the basis of dogma rather than management.</p> <p>This proposal would subject Certificate Holders or applicants to an extremely complex and difficult audit process. An auditor will need one or more ecologist advisors to confirm Ecological District or other such boundaries and then begin a check of areas assigned to each natural forest type, the degree of adjacency, followed by checking complex calculations of areas and multipliers.</p> <p>There is a need to define</p>

Current Wording	Audit comments
<p><i>in adjacent Ecological Districts/or equivalent with reserve percentage exceeding 10%;</i></p> <ul style="list-style-type: none"> • <i>Where an Ecological District boundary (or boundaries) arbitrarily bisects a forest with similar ecological character and landforms, the areas bisected can be considered as one ecological unit for the purposes of calculating percentages.</i> <p><i>(iii) <u>In addition, the following may be included in areas where less than 20% of the , Ecological District or equivalent is protected:</u></i></p> <ul style="list-style-type: none"> • <i>Up to 1% from riparian areas with continuous exotic tree cover, or highly-valued old-growth stands with multiple values to local community;</i> • <i>Restored areas of very poorly represented* ecosystem. Area x 3 multiplier;</i> • <i>Restored examples of poorly represented** ecosystems. Area x 1.5 multiplier.</i> • <i>Habitat that contains rare, threatened or endangered species and is specifically identified and managed for that species under the provisions of 6.2. Area x1.5 multiplier</i> <p>Note 1:</p> <p>* Very poorly represented ecosystems are those with less than 1% of the original extent of that ecosystem type under protection (Dept. of Conservation land or covenanted private land)</p> <p>** Poorly represented ecosystems are those with less than 5% of the original extent of that ecosystem type under protection (Dept.</p>	

Current Wording	Audit comments
<p>of Conservation land or covenanted private land).</p> <p>Note 2:</p> <p>Multipliers above are not cumulative.</p> <p>Verifiers</p> <p>a) <i>Set asides are recorded on maps and accumulated area totals are recorded.</i></p> <p>b) <i>10% set aside is achieved or where it cannot be achieved then this is noted and other steps to contribute to indigenous ecological outcomes is recorded (see 10.5.2)</i></p>	
<p>Indicator 10.5.2</p> <p>Where the reserve set-aside requirements in 10.5.1. cannot be achieved, the Certificate Holder shall seek approval from the National Initiative Committee within 5 years of certification to carry out one or more of the following :</p> <ul style="list-style-type: none"> • <i>Undertake additional active restoration of reserve set-asides (in excess of those required by 6.2, 6.4, and 10.2). within their MU in areas where reserves are under-represented, to improve and further enhance ecological values in those reserves;</i> • <i>Contribute to equivalent restoration or species management projects in secure reserve area outside of the MU in the same or adjacent ecological districts.</i> <p><i>The following will be used as guidance when prioritising restoration projects:</i></p> <ul style="list-style-type: none"> • . • <i>Guidance on priorities provided in the document</i> 	

Current Wording	Audit comments
<p><i>'Protecting Our Places, Information About the Statement of National Priorities for Protecting Rare and Threatened Biodiversity on Provide Land', MfE, April 2007;</i></p> <ul style="list-style-type: none"> • <i>Security of tenure and ability to achieve long term management outcomes;</i> • <i>The level of community or tangata whenua interest in an area or project.</i> • <i>DoC priorities for species management.</i> <p>Verifiers</p> <p>a) Ecological projects as an alternative to 10% set asides are recorded, management objectives recorded and progress recorded.</p> <p>b) Evidence of consultation with National Initiative Committee is recorded.</p>	
<p>Indicator 10.5.3</p> <p>The proportion of overall forest to be managed and restored to natural forest cover (within one rotation of certification or the standards becoming operative) will be identified jointly with the requirements of 6.2, 6.4, 10.2 and 10.5.1, but the overall goal will be to establish and protect sufficient natural areas to enable the maintenance of biodiversity and ecosystem integrity and function. The following principles will be used to guide establishment and management of a protected natural area network:</p> <ul style="list-style-type: none"> • <i>Assess the ecological context of certified forest areas within the ecological landscape</i> • <i>Identify and protect existing natural areas and identified riparian zones with indigenous vegetation</i> 	

Current Wording	Audit comments
<ul style="list-style-type: none"> • <i>Control pest and weeds in those areas</i> • <i>Management of threatened species</i> • <i>Restore within existing natural areas and riparian zones.</i> • <i>Rationalise existing natural areas and riparian zone boundaries by considering aspects of viability and contribution to biodiversity</i> • <i>Restoration of degraded lands to indigenous cover as determined by research to be an ecological necessity to maintain biodiversity.</i> <p>Verifiers</p> <p><i>Existing natural areas and riparian zones are identified and protected as per the priorities set out in 6.2, 6.4 and 10.2, and the requirements for weed and pest management, restoration and expansion carried out.</i></p> <p><i>Within 5 years of certification a course level assessment (desktop exercise) of the FMU has been undertaken to assess future rationalisation of boundaries of natural areas or establishment of new ones. Principles for this assessment include:</i></p> <ol style="list-style-type: none"> a) <i>Proportion and representation of ecosystems remaining in ecological domains or districts</i> b) <i>Viable size and shape</i> c) <i>Quality of habitat</i> d) <i>Links to other reserve areas</i> e) <i>Resilience to introduced species or disturbance events e.g. fire, wind</i> f) <i>Degree of buffering from adjoining land uses or activities.</i> <p><i>The assessment shall include maps for future consideration at harvest time.</i></p>	

Current Wording	Audit comments
<p>Indicator 10.5.4</p> <p>Effective pest and weed control plans are developed as per the priorities and timeframes set out in 6.2, 6.4 and 10.2, 3 years after identification. Plans that detail the management of poorly represented, threatened or endangered species are developed or adopted as species are identified.</p>	
<p>Indicator 10.5.5</p> <p>Restoration programmes identified in 6.4 are progressively commenced 15 years after these standards come into effect or from the date of first certification whichever is the later.</p>	
<p>Indicator 10.5.6</p> <p>The principles of conservation biology are applied in rationalisation of boundaries of natural areas. Principles include:</p> <ul style="list-style-type: none"> • <i>Proportion and representation of ecosystems remaining in ecological domains or districts</i> • <i>Viable size and shape</i> • <i>Quality of habitat</i> • <i>Links to other reserve areas</i> • <i>Resilience to introduced species or disturbance events e.g. fire, wind</i> • <i>Degree of buffering from adjoining land uses or activities.</i> <p>Verifier</p> <p>a) <i>Viability is assessed prior to harvest to determine the best shape, size and location for expansion or rationalisation of reserve areas and any</i></p>	

Current Wording	Audit comments
<p><i>findings enacted at harvest in accordance with 6.2.6</i></p>	
<p>Indicator 10.5.7 Research findings associated with what is appropriate to maintain biodiversity will be applied to develop a comprehensive reserve network strategy within 5 years of the Standard becoming operative or from date of first certification.</p> <p>Verifier</p> <p>a) <i>Where a certificate holder holds information relevant to the development of a comprehensive reserve network strategy this will be supplied freely and on request</i></p>	
<p>Indicator 10.5.8 Where appropriate, restoration of areas adjoining existing representative reserves (including wildlife corridors or poorly represented ecosystems) shall be commenced at harvest after 2030.</p>	
<p>Results for Pan Pac: The areas of existing natural vegetation and ecosystems are protected. Small areas that are not suitable for regeneration into exotics will be allowed to regenerate into natural vegetation.</p>	
<p>Results for Pan Pac (Draft Standard): The area of reserves in one forest in the Waihua ED was less than 10%. Support for restoration projects and species management projects have been witnessed, but these are not ranked in the Draft Standard.</p>	
<p>Criterion 10.6: Measures shall be taken to maintain or improve soil structure, fertility and biological activity. The techniques and rate of harvesting, road and trail construction and maintenance, and the choice of species shall not result</p>	

Current Wording	Audit comments
<p>in long term soil degradation or adverse impacts on water quality, quantity or substantial deviation from stream course drainage patterns.</p>	
<p>Indicator 10.6.1 Forests should be managed to maintain or improve soil quality.</p>	<p>This Criterion is about more than soil quality.</p> <p>This Indicator is difficult to audit as it stands – how to verify?</p> <p>As the first stage in the audit process, do you mean: soil types should be mapped and considered in planning. Major water resources identified.</p> <p>Policies and guidelines in place for soil maintenance and water quality protection.</p> <p>Site disturbing activities to minimise soil disturbance & minimise soil erosion.</p> <p>Site disturbing activities not to adversely impact aquatic and riparian resources, nor the hydrologic characteristics of the site.</p>
<p>Indicator 10.6.2 Plantations should be routinely monitored for reductions in productivity by monitoring the growth of the crop trees, and any reductions investigated to determine if they relate to changes in soil quality.</p> <p>Verifier</p> <p>a) <i>Standard 10.6.1 and 10.6.2 may be met if the certificate holder is taking</i></p>	<p>A Standard shouldn't presume - Monitor for trends in soil productivity and in water quality.</p> <p>If the effects are adverse, plans should exist to restore.</p>

Current Wording	Audit comments
<p><i>part in a research programme that examines long-term site productivity of plantations.</i></p>	<p>The intent of the Verifier is OK</p>
<p>Results for Pan Pac: Soil information is available at a broad scale. Site productivity data is kept and analysed. There is no evidence of soil degradation through forest operations. At Waipatiki forest, soil information data was used to closely prescribe harvesting operations to ensure that machines stayed away from wet areas. The major rivers, streams and ephemeral streams within the FMU have been identified and mapped. Most have been ranked in terms of width and importance.</p>	
<p>Criterion 10.7: Measures shall be taken to prevent and minimize outbreaks of pests, diseases, fire and invasive plant introductions. Integrated pest management shall form an essential part of the management plan, with primary reliance on prevention and biological control methods rather than chemical pesticides and fertilizers. Plantation management should make every effort to move away from chemical pesticides and fertilizers, including their use in nurseries. The use of chemicals is also covered in Criteria 6.6 and 6.7.</p>	
<p>Indicator 10.7.1 Fire</p> <p><i>Fire plans and / or other documentation set out steps to prevent and suppress fires. This documentation should include:</i></p> <ul style="list-style-type: none"> • <i>Contractors responsibilities for action</i> • <i>Contact details for personnel</i> • <i>Emergency procedures</i> • <i>Maps which include important information such as:</i> <ul style="list-style-type: none"> ○ <i>Stand identification</i> ○ <i>Clear access routes</i> ○ <i>Firebreaks</i> ○ <i>Dams, ponds & other water supplies</i> ○ <i>Helipads</i> 	<p>Recommend that the Indicators follow the order of points in the Criterion, so 10.7.2 should be 10.7.1.</p> <p>Again, follow the audit process:</p> <p>Principal pests & diseases are identified, thresholds established and monitored (<i>forest health surveillance programme is in place</i>)</p> <p>Policies and procedures for IPM are followed.</p> <p>Remedial action (control) plans in place.</p>

Current Wording	Audit comments
<ul style="list-style-type: none"> o <i>Important features for protection such as dwellings (including those on adjoining properties), ecological areas, and infrastructure (power lines etc)</i> o <i>Equipment and training for fire suppression</i> o <i>Key contracts (such as harvesting) addressing fire requirements</i> <p><i>There is correspondence and other evidence of involvement with the Rural Fire Authority. There is a system for documenting important records and ensuring compliance with the Forest & Rural Fires Act.</i></p>	<p>Compliance with RPMS's.</p> <p>Probably a good place to bring in Biological control again.</p>
<p>Indicator 10.7.2 <i>Pests & Diseases</i></p> <ul style="list-style-type: none"> • <i>A forest health surveillance programme is in place</i> • <i>Appropriate action is taken in relation to any issues raised in forest health surveillance</i> • <i>Pest control is part of an integrated pest management strategy. This strategy shall identify:</i> <ul style="list-style-type: none"> o <i>the range and number of pests</i> o <i>population dynamics – when is it best to intervene, what is a sustainable pest population</i> o <i>compliance with any applicable regional pest management strategy</i> o <i>methods of intervention</i> <p><i>Pest control methods comply with any applicable regional pest management strategy and/or have minimal and environmentally acceptable impacts on</i></p>	<p>For fire, sufficient to require that the fire prevention and suppression plan complies with the requirements of the Rural Fire Authority, and there is evidence of training of personnel likely to be used in fire suppression.</p>

Current Wording	Audit comments
<p><i>non-target species</i></p> <p>Verifiers</p> <p>a) Chemical use shall be undertaken in accordance with 6.6</p> <p>b) The certificate holder contributes to New Zealand’s biosecurity programmes through:</p> <ul style="list-style-type: none"> • <i>Membership of NZFOA or</i> • <i>Equivalent biosecurity contribution</i> <p>c) Any biological control agent or other new organism that is used, has been screened for non – target impacts, and a precautionary approach taken to assessing adverse environmental effects</p>	
<p>Results for Pan Pac: There is evidence of identification of the main pests and diseases. A Forest Health survey is undertaken by an independent expert.</p> <p>The Company has an Integrated Pest Management Plan, and complies with the Regional Pest Management Strategy.</p> <p>Pan Pac is an active member of the Bay Forests Rural Fire District. Company resources are committed to the Rural Fire District (RFD). Company staff are trained and take part in RFD activities.</p>	
<p>Criterion 10.8: Appropriate to the scale and diversity of the operation, monitoring of plantations, shall include regular assessment of potential on-site and off-site impacts, (e.g. natural regeneration, effects on water resources and soil fertility, and impacts on local welfare and social well-being), in addition to those elements addressed in principles 8, 6 and 4. No species should be planted on a large scale until local trials and/or experience have shown that they are ecologically well-adapted to the site, are not invasive, and do not have significant negative ecological impacts on other ecosystems. Special attention will be paid to social issues of land acquisition for plantations, especially the protection of local rights of ownership, use or access.</p>	

Current Wording	Audit comments
<p>Indicator 10.8.1</p> <p>A programme shall be provided of internal monitoring of the environmental performance of forest management practices appropriate to the scale of the operation.</p> <p>Verifiers</p> <p>a) There is a documented programme of monitoring of forest management practices.</p> <p>b) Depending on the size of the forest operation and the sensitivity of the site, this may include:</p> <ul style="list-style-type: none"> • Supervision during harvesting & other operations • Post harvest site checks • Resource consent reports • Long term studies assessing the impact of activities <p>c) There is a system for maintaining monitoring records.</p> <p>d) Regulatory authority monitoring is recorded or publicly available</p>	<p>The wording of the Indicator is somewhat clumsy.</p> <p>To measure the Criterion, it would be appropriate to have separate Indicators for on-site and for off-site impacts, exotic species issues, and social impacts, including land acquisition.</p> <p>Is it only internal monitoring, or is some external monitoring appropriate – see verifier (d).</p> <p>Verifier (b) needs to be a more complete list.</p>
<p>Results for Pan Pac: The Environmental Effects Matrix covers monitoring of all the known impacts.</p> <p>There is evidence of consultation with DOC and stakeholders, and of on-going monitoring and follow-up work, e.g. removing Douglas fir from a beech RAP.</p>	
<p>Criterion 10.9: Plantations established in areas converted from natural forests after November 1994 normally shall not qualify for certification. Certification may be allowed in circumstances where sufficient evidence is submitted to the certification body that the manager/owner is not responsible directly or indirectly of such conversion.</p>	
<p>Indicator 10.9.1</p>	

Current Wording	Audit comments
<p>The Plantation does not occupy land converted from naturally occurring vegetation after 30 November 1994.</p>	<p>OK. The definition of Naturally Occurring Vegetation should be in the Glossary, not the body of the Standard.</p>
<p>Indicator 10.9.2</p> <p>If the plantation was established after November 1994 on land within the definition of 10.9.4, there is adequate evidence that the current manager/owner was not directly or indirectly responsible.</p>	<p>As above. The words “on land within the definition of 10.9.4” may be removed.</p>
<p>Indicator 10.9.3</p> <p>Lands in multiple Maori ownership containing naturally occurring vegetation can be converted to planted forest provided:</p> <p>Verifier</p> <p>a) Evidence is available to show that the area to be planted was in pasture prior to 1994.</p> <p>b) Areas of natural vegetation that were not previously in pasture (as per a) which are contained within a land block where new plantations are established, shall be identified as reserves, protected and managed as per 6.4. <i>Areas which contain viable populations of threatened species are also to be protected as per the provisions of 6.2</i></p> <p>c) The total FMU containing the new planted forests shall meet the reserve set aside provisions of 10.5.8</p> <p>Note: Evidence that the land was pasture would most likely be provided from aerial photos.</p>	<p>OK with the NZ aspect of this.</p>

Current Wording	Audit comments
Results for Pan Pac: The Company's plantation area does not occupy land converted from natural forests after 1994.	