

2.0		CORRECTIVE ACTION REGISTER			SFM Environmental Solutions		SA-FM/COC-002984		
Justification for grading (DROP DOWN LIST)	No.	Grade	Non-compliance (or potential non-compliance for an Observation) (Groups: specify Group or Member level)	Std ref	Corrective Action Request	Deadline	Date & Evidence (Record date & name if closing between surveillance audits.)	Status	Date Closed
CARs from S4									
Minor - impact limited temporal and spatial scale	2020.01	Minor	The group scheme documents member capacity as not being limited by actual numbers, but by capacity of organisation to support those members, however, the standard requires the maximum number of members to be specified.	Gp 1.12	The Group entity shall specify in their procedures the maximum number of members that can be supported by the management system and the human and technical capacities of the Group entity.	Within 1 year, to be checked at next annual surveillance	13 Nov 2020: Following the audit, and prior to completion of the audit report, the company supplied a revised SFM Membership Rules (10 Nov 2020) which specifies "50,000ha or 15 FMUs is the threshold in which SFM Management will review resources to support the SFM Group Scheme". Condition closed.	Closed	13-Nov-20
Minor - impact limited temporal and spatial scale	2020.02	Minor	In developing its ESRAs, it is not clear that the company has consulted the online FSC database for information exchange on alternatives and monitoring procedures.	FSC-POL-30-001 V3-0 Para 4.12 part 8 SA A1.1 1.1.6.7	The company shall consult the online FSC database for information exchange on alternatives and monitoring procedures when developing ESRAs.	Within 1 year, to be checked at next annual surveillance	13 Nov 2020: Following the audit, and prior to completion of the audit report, the company provided evidence that the company had consulted the FSC database, but found it dysfunctional and unable to provide any information on potential alternatives or monitoring procedures. The company was able to demonstrate that consideration of potential alternatives and monitoring procedures was undertaken in development of the company's Integrated Pest Management Plan and the industry collaborative development of the ESRAs. Condition closed.	Closed	13-Nov-20
Minor - impact limited temporal and spatial scale	2020.03	Minor	It is not clear that the company has informed third-party nursery suppliers in Tasmania of the list of FSC prohibited chemical pesticides, encouraging them to avoid these pesticides in their processes and in the production of seedlings and other materials entering the management unit.	FSC-POL-30-001 V3-0 Para 4.12 part 12 SA Cert A1.1 1.1.6.13	The Company shall inform third-party processing plants located in the spatial area of the MU and third-party nursery suppliers of the list of FSC prohibited chemical pesticides, encouraging them to avoid these pesticides in their processes and in the production of seedlings and other materials entering the management unit.	Within 1 year, to be checked at next annual surveillance	13 Nov 2020: Following the audit, and prior to completion of the audit report, the company provided evidence to demonstrate that it had contacted its two nursery suppliers in Tasmania encouraging them to avoid FSC prohibited chemical pesticides in their processes and in the production of seedlings for the company and requesting a list of any FSC prohibited chemical pesticides used by them with respect to seedlings produced for the company (emails 9 Nov 2020 sighted). Condition closed.	Closed	13-Nov-20
Minor - impact limited temporal and spatial scale	2020.04	Minor	It is not clear that the company has requested the list of FSC prohibited chemical pesticides used by supplier nurseries in Tasmania.	FSC-POL-30-001 V3-0 Para 4.12 part 13 SA Cert A1.1 1.1.6.14	The company shall request the list of FSC prohibited chemical pesticides used by processing plants and nurseries suppliers.	Within 1 year, to be checked at next annual surveillance	13 Nov 2020: Following the audit, and prior to completion of the audit report, the company provided evidence to demonstrate that it had contacted its two nursery suppliers in Tasmania encouraging them to avoid FSC prohibited chemical pesticides in their processes and in the production of seedlings for the company and requesting a list of any FSC prohibited chemical pesticides used by them with respect to seedlings produced for the company (emails 9 Nov 2020 sighted). Condition closed.	Closed	13-Nov-20
OBS - complies with the STD requirements but potential NC in future	2020.05	Obs	It was noted that as part of the acquisition of the Lenah Estate as a group member in July 2020, the company also obtained significant planning and operational documentation from the previous (FSC-certified) managers, Norske Skog Boyer. The company is currently in the process of evaluating and incorporating applicable documentation relating to management of the Lenah Estate into its own management system, adopting much of the previous manager's documentation as an interim measure. The Lenah FMU was audited for the first time and the audit team were able to learn about the approaches to the identification of HCV's through the Regional Ecosystem Model, the desktop and on-ground check of the HCV occurrences, monitoring through the HCV Management Plan and the management of HCVs through the FPP SAH0096-01 and associated mapping and audit documents. The Norske Skog HCV assessment and management documents proved to be especially important to this audit and yielded a significant amount of data and information. Future audits will examine with interest the translation of this information into the SFM monitoring program, and how this monitoring utilises the best approach to demonstrating maintenance or improvement to condition of the HCVs. In addition, the ability for SFM managers Lenah estate to incorporate new information on emerging issues through an adaptive management approach may be important. SFMs commitment to engage a specialist ecologist is noted. The company briefed the audit team on the systems review and mapping exercise that is currently underway. Prioritisation has been made on the basis of risk and considerable progress was demonstrated. However, until this process has been complete, there are potential risks and inconsistencies to operational planning and outcomes for the Lenah estate.	7.1.2	The company shall ensure that specific operational management objectives that address the requirements of this standard are defined.	N/a		Open	
OBS - complies with the STD requirements but potential NC in future	2020.06	Obs	The company is currently in the process of evaluating and incorporating applicable documentation relating to management of the Lenah Estate into its own management system, adopting much of the previous manager's documentation as an interim measure, including the Norske Skog High Conservation Value Forest Management Plan 2019. In the lead up to re-certification in 2021, it will be important for the company to demonstrate that HCV assessment for the Lenah estate and in particular the associated stakeholder consultation has been carried out in accordance with the assessment pathways documented in Annex G.	9.2.3	The company shall ensure it consults with affected and interested stakeholders* and regional experts with knowledge of the conservation* of HCVs* in the development of management strategies and actions to maintain and/or enhance the identified High Conservation Values*.	N/a		Open	
OBS - complies with the STD requirements but potential NC in future	2020.07	Obs	While the company has only had management responsibility for the Lenah estate since July 2020, and it is acknowledged that Procedure - Conservation Values Monitoring (Dec 2018) will be applied at Lenah, no HCV monitoring has yet occurred at Lenah (although it is acknowledged that operational auditing FPPs at Lenah will pick up some HCV monitoring, and conservation monitoring is planned for Jun 2021). In the lead up to re-certification in 2021, it will be important for the company to demonstrate that the company's HCV monitoring program has been implemented at Lenah.	9.4	The company shall ensure that a program of periodic monitoring assesses the following, consistent with Annex G: 1) Implementation of strategies; 2) The status of High Conservation Values, including High Conservation Value Areas on which they depend; and 3) The effectiveness of the management strategies and actions for the protection of High Conservation Values*, to maintain and/or enhance the High Conservation Values.	N/a		Open	