

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
<b>CARs from S5</b>									
OBS - complies with the STD requirements but potential NC in future	2021.01	Obs	While the Chemical Use Register for the Limestone FMUs presents accessible information on the area of application for each chemical usage, the Register for Lenah only presents to total area treated with ALL chemicals, and does not present accessible information on the total area of application for EACH chemical. This information is collected in the individual Chemical Application Forms (e.g. Chemical Application Form TH16347, Coupe EN029Z, Aerial pre-plant herbicide 1 Jun 2021). This information on the total area on which each chemical has been applied should be collated and available for inspection at audit.	10.7.4	The company should ensure records of pesticide usage are maintained, including trade name, active ingredient, quantity of active ingredient used, period of use, location and area of use and reason for use.	N/a		Open	
OBS - complies with the STD requirements but potential NC in future	2021.02	Obs	With the acquisition of forest management responsibility of the Tasmanian Lenah Estate SFM have recognised the need to standardise and communicate assessments of threats to identified HCVs across Tasmania, Victoria, South Australia and Western Australia. The process has led to the development of a standardised threat assessments that are outlined within the SFM Biodiversity, HCV and Native Vegetation Management Procedure. The implementation of this procedure was tested by examining updated data on potential HCVs and plant biodiversity in the Limestone property Davidson (WA). This new information was motivated by the FSC auditor field visit in 2018 which identified possible inconsistencies with the original HCV assessment for vegetation on the site with the auditor observed vegetation community on site. Important new information from the updated botanical survey identified in excess of 170 native plant species and one possible Priority Ecological Community (WA Biodiversity Conservation Act 2016), dominated by <i>Banksia coccinea</i> . In addition, the highly invasive weed species Sydney golden wattle ( <i>Acacia longifolia</i> ) was identified. These are positive results and demonstrate SFMs commitment to management of HCVs through an Adaptive Management process. An examination of documentation that relates or supports management interventions did identify several errors. On page 11 of the recently developed SFM Native Vegetation Management procedure, the threat assessment graded the "Damage or death of threatened and/or non-threatened native vegetation" to WA Limestone properties as Low. This is an error; the <i>B. coccinea</i> dominated vegetation community at Davidson is highly susceptible to the Environment Protection and Biodiversity Conservation Act (1999) listed threat <i>Phytophthora dieback</i> disease (caused by plant pathogen <i>Phytophthora cinnamomi</i> ). In following the threat assessment and management intervention pathway, the SFM HCV Assessment Process was examined. On page 10, this document refers to the National Threat Abatement Plan 2018 for <i>Phytophthora dieback</i> . The HCV Assessment document describes the pathogen as a "root fungus". This minor error is important from a management perspective. <i>Phytophthora cinnamomi</i> is not a fungus but an Oomycete. One treatment that is possible for use in controlling <i>Phytophthora dieback</i> is a chemical called phosphite. This chemical is not approved as a fungicide for treatment of <i>Phytophthora dieback</i> and its APVMA off-label application in this situation is to prevent infection of susceptible plants by the pathogen – the treatment does not kill the Oomycete. Given the identification of Sydney coast wattle, SFM have correctly generated a CPAR within the SFM management system. The title for the CPAR is "Coastal Wattle". There is the potential for error here. Coastal wattle (coast wattle) refers to the species <i>Acacia longifolia</i> subsp. <i>Sophorae</i> . This is a problematic species in WA, more often in the Perth and Southern Jarrah Forest IBRA subregions. The species identified in the Davidson botanical re-survey was Sydney golden wattle, <i>Acacia longifolia</i> . This species has a range that includes Davidson. The error is minor but important. Local management advice provided to SFM relates to Sydney golden wattle and not coastal wattle. There is an opportunity for the company to provide clarification on these two issues.	9.3.2	The company should ensure that the strategies and actions to maintain and/or enhance and avoid risks to High Conservation Values are implemented, even when the scientific information is incomplete or inconclusive, and when the vulnerability and sensitivity of High Conservation Values are uncertain.	N/a		Open	