



**BUREAU  
VERITAS**

**Bureau Veritas Certification  
North America, Inc.  
SFI Audit Report**

390 Benmar Drive, Suite 100  
Houston, TX 77060

Phone (281) 986-1300: Toll Free (800) 937-9311

Company Name	Bennett Lumber Products, Inc.
Contact Person	Halli Hemingway
Address	3759 Highway 6, Princeton, ID 83857-0130
Phone / Fax	208-875-1121/ Fax 208-875-0191
PQC Code	01E

Contract Number:	US.1416503	Certification Audit:		Re-Certification Audit:		X	Surveillance: (Indicate visit # or Pre-Assessment)	
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**Audit Summary**

**Introduction**

A renewal audit of the land management and fiber sourcing program at Bennett Lumber Products (BLP) was conducted on July 9-10, 2013. The audit was conducted by Gregory Bassler, Lead Auditor. Stuart Macpherson, ANAB Assessor and Jim Colla, Bureau Veritas Forestry Lead Auditor/CoC Group Manager observed the audit.

**Audit Scope, Objectives and Process**

The scope of the renewal audit was “Forestry operations on 65,019 acres in the States of Idaho and Washington. Wood procurement system supplying sawmills in Princeton, Idaho and Clarkston, Washington”. The objective was to verify the effectiveness of the Bennett Lumber Products SFI Forest Land Management and Fiber Sourcing program and conformance to the Requirements of the SFI 2010-2014 Standard. All applicable Objectives, Performance Measures and Indicators of the SFI 2010-2014 Standard were the focus of the renewal audit.

**Audit Plan**

The opening meeting of the audit was held at the Bennett Lumber Products, Inc. office in Princeton, ID on Tuesday, July 9, 2013. Halli Hemingway, Forestry/GIS Analyst; Tim Schaffer, Forester and Tom Biltonen, Forestry Resource Manager were in attendance. The Lead Auditor, Gregory Bassler, introduced himself and reviewed the scope, objectives and audit plan. Non-conformances and the requirements for clearing them, opportunities for improvement, and notable practices were also discussed at the opening meeting. The closing meeting time was confirmed and was to be held at the Bennett Lumber Products Princeton office on Wednesday, July 10, 2013 at 3:00 PM.

The logistics of the audit plan were discussed and the sites confirmed for the field portion of the audit to be conducted the following day. The document review portion of the audit was conducted the first day immediately following the opening meeting. The audit plan is included in this report and is maintained on file by Bureau Veritas Certification.

Field files for each site were reviewed and used to determine effectiveness of the Bennett Lumber Products forest management system and process. The Objectives, Performance Measures and Indicators were all verified through a review of documents and field verification of sites to meet the intent of the SFI 2010-2014 Standard. A debriefing was conducted at the end of the first day by the Lead Auditor.

The renewal audit was conducted under environmental auditing methodologies identified in the 2010-2014 Verification/Certifications Principles and Procedures document (SFI-V/CPP) and standard Bureau Veritas Certification protocols and forms were applied throughout the verification. Prior to the audit, the auditor selected sites in the Princeton, ID mill sourcing area to be sampled based on management activities conducted

over the previous 12 months.

### **Company Information**

Bennett Lumber Products, Inc. (BLP) owns two sawmill processing facilities: Bennett Lumber Products, Inc. in Princeton, ID and Guy Bennett Lumber Company in Clarkston, WA. Bennett Lumber Products produces quality dimension and board lumber. Logs are procured from fee lands, open market (gatewood) and purchased stumpage sales. The Clarkston, WA facility has been closed since early 2009 however; plans are to reopen the mill when market conditions improve. The headquarters and corporate officers are located at the Princeton, ID facility.

### **Multi-Site Requirements**

Bennett Lumber Products is a multi-site organization and has a central office or headquarters (Princeton, ID) at which certain activities are planned, controlled or managed. The Princeton, ID central office provides both sawmill facilities with information and guidance on activities. The scope and scale of activities are similar at both sites. Each facility operates under a common forest management system, policies and set of procedures that is managed and administered by the central office.

For multi-site certifications, a site sampling method is generally used. The number of sites to be audited is equal to the square of the number of sites x 0.8 for renewal audits. A site sampling method was used and both sites plus headquarters are to be audited on an annual basis. Since the Clarkston, WA facility is closed and all operations remain inactive, it was not audited. Bennett Lumber Products continues to be in conformance with all multi-site requirements.

<b>Sites</b>	<b>Sites Audited During this Event</b>
Princeton, ID (Central Office)	X
Clarkston, WA	

### **Audit Results**

A total of 5 sites (3 fee land and 2 gatewood) were visited during the field portion of the audit. All three fee land sites were active. The contractors were all Pro-logger trained and knowledgeable of state BMP's and BLP policies. Each contractor had sill and first aid kits and were knowledgeable on emergency medevac procedures. The individual site harvest prescriptions varied and consisted of sanitation salvage, seed tree and selective cut. Each unit had designations for natural and /or artificial regeneration and met green up requirements. Management activities included roadside chemical application for invasive weed control, stream protection, and road maintenance and harvest operations.

The Princeton, ID central office conducts and maintains an internal audit program to review and monitor conformance of each facility. BMP monitoring is on-going and a summary report is prepared annually. IDL Forest Practices inspected 42% of the fee land jobs and 37% of the gatewood operations in 2012. IDL also prepares an annual Idaho Forest Practices Year End Report which summarizes findings of all inspections conducted throughout the State during the year. BLP conducts an internal SFI Performance Measures review and management review annually. Bennett Lumber Products has a good, reliable internal audit program and monitoring system carried out at headquarters to determine conformance at each facility and to implement corrective actions when appropriate. There is good coordination and communication between the central office and each facility.

During the field audit of the fee land sites, excessive rutting from skidding operations was observed at one site. At one particular location, ruts developed in a skid trail and the skidder operator continued to move over creating a series of parallel rutted trails. Soil conditions were wet due to a recent heavy rain event. This generated a finding of non-conformance. No rutting issues were observed on any of the other sites inspected. Overall, Bennett Lumber Products conforms to the land management and fiber sourcing requirements of the SFI Standard.

Bennett Lumber Products, Inc. did not have any substitution or modifications to any of the Indicators. There were no trends in the SFI implementation of the field audit or document review that would indicate that any particular area needs special attention. A SF 61 was completed and contains specific information and audit notes.

## Findings

### Previous non-conformances:

*No non-conformances were identified in the 2012 surveillance audit of Bennett Lumber Products.*

### Non-conformances:

*One minor non-conformance was issued. An SF02 nonconformity report was completed and is included as part of this report. The observed non-conformity issued:*

- 1. Objective 2, PM 2.3, Indicator 4 – Excessive rutting was observed on an active fee land harvest unit.*

### Opportunities for Improvement:

*An opportunity for improvement is a process/activity/document that, while currently conforming, could be improved. Seven opportunities for improvement were issued during the renewal audit.*

- 1. Objective 2, PM 2.3, Ind. 2: Consider adding a soils layer review checkbox to the Site Activity Plan/Report.*
- 2. Objective 1, PM 1.1 Ind. 5: Consider requiring all contractors to have a copy of the Site Activity Report on site at all times.*
- 3. Objective 8, PM 8.1, I-1-d: Consider providing additional links for information on threatened & endangered plant and animal species on the Bennett Lumber Products website.*
- 4. Objective 8, PM 8.1, I-1-g: Consider providing additional links for information on characteristics of special sites on the Bennett Lumber Products website.*
- 5. Objective 17, PM 17.1, I-4: Consider investigating additional opportunities to promote conservation of managed forests.*
- 6. Objective 17, PM 17.2, I-1: Review documentation of educational opportunities promoting sustainable forestry.*
- 7. Objective 20, PM 20.1, I-3: Consider reviewing all available monitoring information and providing better documentation of continual improvement goals.*

### Notable Practices:

*No notable practices were observed during the renewal audit.*

### Logo/label use:

Bennett Lumber Products stated and observations indicated there was no new use of the label and/or logo since the last surveillance audit. Logo/label use is in conformance with label/logo use requirements. Bennett Lumber Products, Inc. does not use the Bureau Veritas Certification logo.

### SFI reporting:

A review of the SFI, Inc. website provided evidence that the previous audit of Bennett Lumber Products, Inc. SFI forest management and procurement program was submitted and posted as required for public notification.

## Conclusions

The Closing Meeting of the renewal audit was held Wednesday afternoon, July 10, 2013. Halli Hemingway, Forestry/GIS Analyst; Tim Schaffer, Forester; Tom Biltonen, Forestry Resource Manager and Scott Bruce, Forester were in attendance. Lead Auditor Gregory Bassler presented and reviewed the audit findings. Confidentiality of the audit results was assured. Bennett Lumber Products, Inc. continues to meet the SFI

requirements and has effectively implemented the 2010-2014 SFI Standards in their forest management and fiber sourcing operations. Bureau Veritas recommends conditional recertification. To clear and close the non-conformance, a root cause analysis and corrective actions plan must be submitted to the Lead Auditor within thirty days after the closing meeting. Corrective action measures can be implemented once approved and cleared by the Lead Auditor. Implementation of corrective actions will be checked at the next surveillance audit and if successfully implemented, the non-conformance will be closed at that time.

### Renewal Audit Schedule

**Date: Tuesday, July 9, 2013**

Time	Activity	Bureau Veritas Repr.	Company Repr.
08:00 AM	Arrive on Site	Bassler	
08:15 AM	Opening Meeting	Bassler	Halli Hemingway
08:30 AM	Begin document review of Objectives 1-10, 14, 15, 16, 17, 19 & 20 of the SFI 2010-2014 Standard.	Bassler	Halli Hemingway
12:30 PM	<b>Lunch</b>		
01:00 PM	Continue document review Objectives 1-10, 14, 15, 16, 17, 19 & 20 of the SFI 2010-2014 Standard.	Bassler	Halli Hemingway
04:30 PM	Preparation for Daily Review Meeting	Bassler	
04:45 PM	Daily Debrief	Bassler	Halli Hemingway/All
05:00 PM	Depart from Site		

**Date: Wednesday, July 10, 2013**

Time	Activity	Bureau Veritas Repr.	Company Repr.
07:45 AM	Arrive on Site	Bassler	
08:00 AM	Begin field audit of selected sites.	Bassler	Halli Hemingway/All
02:30 PM	Return to headquarters office, auditor prepare audit findings	Bassler	
3:00 PM	Closing meeting	Bassler	Halli Hemingway/All
3:30 PM	ANAB Closing Meeting	Bassler	
4:00 PM	Depart site		

**SEE SF61/SF71 FOR AUDIT NOTES**

Summary of Audit Findings:									
Audit Date(s):		From: July 9, 2013				To: July 10, 2013			
Number of SF02's Raised:			Major:		0		Minor:		1
Is a follow up visit required:			Yes	No	X	Date(s) of follow up visit:			
Follow-up visit remarks:									
Team Leader Recommendation:									
Corrective Action Plan (s) Accepted			Yes	X	No		Date:		July 17, 2013
Proceed to/Continue Certification			Yes	X	No		Date:		July 10, 2013
All NCR's Cleared			Yes	X	No		Date:		July 17, 2013
Standard audit conducted against:									
1)	SFI 2010:2014			3)					
2)				4)					
Team Leader (1):			Team Members (2, 3, 4...)						
Gregory Bassler, RAB EMS-LA			2)						
			3)						
			4)						
			5)						
Scope of Supply: (scope statement must be verified and appear in the space below)									
Forestry operations on 65,019 acres in the States of Idaho and Washington. Wood procurement system supplying sawmills in Princeton, Idaho and Clarkston, Washington									
Accreditation's		ANAB							
Number of Certificates		2							
Proposed Date for Next Audit Event									
Date		July 2014							
Audit Report Distribution									
Client: Bennett Lumber Products, Inc. -Halli Hemingway, GIS/Forestry Analyst, <a href="mailto:halli@blpi.com">halli@blpi.com</a>									
BVC - Cornelia Holmes, Customer Service Representative, <a href="mailto:cornelia.holmes@us.bureauveritas.com">cornelia.holmes@us.bureauveritas.com</a>									

<b>Clause</b>	<b>Audit Report</b>
Opening Meeting	<p>Participants: Halli Hemingway, Forestry/GIS Analyst; Tim Schaffer, Forester and Tom Biltonen,</p> <p>Discussions: Forestry Resource Manager were in attendance.</p> <ul style="list-style-type: none"> <li>➤ Introductions</li> <li>➤ Scope of the audit</li> <li>➤ Audit schedule/plan</li> <li>➤ Nonconformance types – Major / Minor</li> <li>➤ Review of previous non-conformances - 0.</li> <li>➤ Process approach to auditing and audit sampling</li> <li>➤ Confidentiality agreement</li> <li>➤ Termination of the audit</li> <li>➤ Appeals process</li> <li>➤ Closing meeting timing</li> </ul>
Closing Meeting	<p>Participants: Halli Hemingway, Forestry/GIS Analyst; Tim Schaffer, Forester; Tom Biltonen,</p> <p>Discussions: Forestry Resource Manager and Scott Bruce, Forester were in attendance.</p> <ul style="list-style-type: none"> <li>➤ Introductions and appreciation for selecting Bureau Veritas Certification.</li> <li>➤ Review of audit process - process approach and sampling.</li> <li>➤ Review of OFIs and System Strengths</li> <li>➤ Non-conformances - 1</li> <li>➤ Date for next audit.</li> <li>➤ Reporting protocol and timing</li> </ul>



## SF02/NA NONCONFORMITY REPORT

Company Name and Site:			<u>SF02#:</u>
Bennett Lumber Products, Inc.			01
Contract #:	Type of audit (e.g., initial, surveillance):	Team Leader:	
US.1416503	Renewal	Gregory Bassler	
Date:	Standard and Clause #:	Team Member:	
July 10, 2013	SFI 2010-2014		
Major	Minor	Other Documents (if applicable):	Company Representative:
	X		Halli Hemingway

### REQUIREMENT OF AUDITED STANDARD:

Objective 2, PM 2.3, I -3 Post-harvest conditions conducive to maintaining site productivity.

### OBSERVED NONCONFORMITY AND, for FSC only, CORRECTIVE ACTION REQUEST:

Excessive rutting was observed on an active fee land harvest unit.

### ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION PLAN

(To be completed by the Company. Plan to be submitted in 30 days)

Corrective Action Plan Date:	August 10, 2013	Company Representative:	Halli Hemingway
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#### Root Cause Analysis and Corrective Action

##### Root Cause:

- 1) Insufficient monitoring of fee land harvest activity after a significant wet weather event.
- 2) Insufficient training of contactor and contract supervisor.

##### Corrective Action Plan:

- 1) The following will be added to Bennett Lumber's wet weather policy: "Contract supervisors will make special efforts to visit and monitor active fee land harvest units after significant wet weather events."
- 2) Contractor and contract supervisor will attend additional BMP training.

### ROOT CAUSE AND CORRECTIVE ACTION PLAN ACCEPTANCE REPORT

(To be completed by Bureau Veritas Certification – Verify effective identification of Root Cause and acceptance of Corrective Action Plan)

Root Cause: The analysis correctly identified the root cause of the non-conformity.

Corrective Action Plan: The corrective measures outlined will adequately remedy and prevent the non-conformity from occurring again. CAP is accepted.

Plan Accepted:	Yes	X	No		Comments:	Good analysis.
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Auditor:	Gregory Bassler	Date:	July 17, 2013
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### CORRECTIVE ACTION IMPLEMENTATION

To be completed by Company – Provide objective evidence. Not to exceed: 90 Days SFI, PEFC ; 1 year FSC ; other  X Days

Corrective Action Completion Date:		Company Representative:	
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#### Corrective Action Implementation:

Method used to verify effectiveness of action taken:

### CORRECTIVE ACTION IMPLEMENTATION ACCEPTANCE REPORT

(To be completed by Bureau Veritas Certification – Acceptance of Corrective Action taken)

Accepted:	Yes		No		Nonconformance Closed:	Yes		No
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Follow Up Comments:			
Auditor:		Date:	