

NSF International Forestry Program Foley Cellulose LLC Public Summary Audit Report

SFI Forest Management

The SFI Program of Foley Cellulose LLC of Perry, Florida has demonstrated conformance with the SFI 2015-2019 Standard and Rules, Section 2 – Forest Management Standard, according to the NSF Certification Process.

The forest land has been under certification since 2012 and Buckeye Florida, LP has since converted to an LLC and changed its name to Foley Cellulose LLC. This report describes the Surveillance Audit design to focus on the existing land management operations in the Perry, FL area. The procurement organization is certified under Georgia-Pacific LLC.

The audit was performed by NSF on November 6, 2015 by an audit team headed by Tucker Watts, Lead Auditor. Audit team members fulfill the qualification criteria for conducting audits contained in SFI 2015-2019 Standards and Rules, Section 9 - Procedures and Auditor Qualifications and Accreditation.

The objective of the audit was to assess conformance of the firm's SFI Program to the requirements of the SFI 2015-2019 Standard and Rules, Section 2 – Forest Management.

The scope of the audit included forest management operations. Forest practices that were the focus of field inspections included those that have been under active management over the planning period of the past 3 years. In addition practices conducted earlier were also reviewed as appropriate (regeneration and BMP issues, for example); SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were also within the scope of the audit.

Several of the SFI Section 2 requirements were outside of the scope of Foley Cellulose LLC's SFI program and were excluded from the scope of the SFI Certification Audit as follows:

- Indicator 2.1.3 - Foley Cellulose LLC does not plant exotic species.
- Indicator 2.1.5 - Foley Cellulose LLC does not afforest non-forested landscapes.
- Indicator 2.3.4 - Foley Cellulose LLC does not currently thin its pine plantations or cut in hardwood stands.
- Indicator 8.2.1 - Foley Cellulose LLC does not manage public lands.
- Indicator 10.1.2 - Foley Cellulose LLC does not purchase or research genetically engineered trees.
- Objective 13 - Foley Cellulose does not have management responsibilities on public lands.

Audit Process

The audit was governed by a detailed audit plan designed to enable the audit team to efficiently determine conformance with the applicable SFI requirements. The plan provided for the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices.

During the audit, NSF reviewed a sample of the written documentation assembled to provide objective evidence of Conformance. NSF also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in the NSF protocols. NSF also selected and interviewed stakeholders such as contract loggers, landowners and other interested parties, and interviewed employees within the organization to confirm that the SFI Standard was understood and actively implemented.

The possible findings of the audit included Full Conformance, Major Non-conformance, Minor Non-conformance, Opportunities for Improvement, and Practices that exceeded the Basic Requirements of the standard.

Overview of Audit Findings

Foley Cellulose LLC was found to be in conformance with the standard. NSF determined that there were no minor non-conformances.

The next Surveillance Audit is scheduled for November, 2016.

General Description of Evidence of Conformity

NSF's audit team used a variety of evidence to determine conformance. A general description of this evidence is provided below, organized by SFI Objective.

Objective 1 Forest Management Planning

To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion.

Summary of Evidence: The forest management plan and supporting documentation and the associated inventory data and growth models were the key evidence of conformance.

Objective 2 Forest Health and Productivity

To ensure long-term forest productivity, carbon storage and conservation of forest resources through prompt reforestation, afforestation, minimized chemical use, soil conservation, and protecting forests from damaging agents.

Summary of Evidence: Field observations and associated records were used to confirm practices. Programs for reforestation, for protection against insects and diseases and wildfire, and for careful management of activities which could potentially impact soil and long-term productivity, were all observed.

Objective 3 Protection and Maintenance of Water Resources

To protect the water quality of rivers, streams, lakes, wetlands and other water bodies through meeting or exceeding best management practices.

Summary of Evidence: Field observations of a range of sites were the key evidence. Auditors visited the portions of many field sites that were closest to water resources.

Objective 4 Conservation of Biological Diversity

To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote a diversity of types of habitat and successional stages, and the conservation of forest plants and animals, including aquatic species, as well as threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests and ecologically important sites.

Summary of Evidence: Field observations, written plans and policies, use of college-trained field biologists, availability of specialists, and regular staff involvement in conferences and workshops that cover scientific advances were the evidence used to assess the requirements involved biodiversity conservation.

Objective 5 Management of Visual Quality and Recreational Benefits

To manage the visual impact of forest operations and provide recreational opportunities for the public.

Summary of Evidence: Field observations of completed operations and policies/procedures for visual quality were assessed during the evaluation. Further maps of recreation sites, combined with field visits, helped confirm a strong recreation program.

Objective 6 Protection of Special Sites

To manage lands that are geologically or culturally important in a manner that takes into account their unique qualities.

Summary of Evidence: Field observations of completed operations, records of special sites, training records, and written protection plans were all assessed during the evaluation.

Objective 7 Efficient Use of Fiber Resources

To minimize waste and ensure the efficient use of fiber resources.

Summary of Evidence: Field observations of completed operations, contract clauses, and discussions with supervising field foresters provided the key evidence.

Objective 8 Recognize and Respect Indigenous Peoples' Rights

To recognize and respect Indigenous Peoples' rights and traditional knowledge.

Summary of Evidence: Communication and response to affected Indigenous People were witnessed as evidence.

Objective 9 Legal and Regulatory Compliance

To comply with applicable federal, provincial, state and local laws and regulations.

Summary of Evidence: Field reviews of ongoing and completed operations were the most critical evidence.

Objective 10 Forestry Research, Science and Technology

To invest in forestry research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of climate change impacts on forests, wildlife and biological diversity.

Summary of Evidence: Financial records were confirmed by receipt from funded agency.

Objective 11 Training and Education

To improve the implementation of sustainable forestry practices through appropriate training and education programs.

Summary of Evidence: Training records of personnel, records associated with harvest sites audited, and review of the state training database provided confirmation of participation in training programs.

Objective 12 Community Involvement and Landowner Outreach

To broaden the practice of sustainable forestry through public outreach, education, and involvement, and to support the efforts of SFI Implementation Committees.

Summary of Evidence: Financial Support Invoices, agendas for meetings, and selected summaries of comments were sufficient to assess the requirements.

Objective 13 Public Land Management Responsibilities

To participate and implement sustainable forest management on public lands.

Summary of Evidence: N.A. The Company does not have management responsibilities for public lands.

Objective 14 Communications and Public Reporting

To increase transparency and to annually report progress on conformance with the SFI Forest Management Standard.

Summary of Evidence: Reports filed with SFI Inc. and the SFI Inc. website provided the key evidence.

Objective 15. Management Review and Continual Improvement

To promote continual improvement in the practice of sustainable forestry by conducting a management review and monitoring performance.

Summary of Evidence: Records of program reviews, agendas and notes from management review meetings, and interviews with personnel involved in management review were assessed.

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