



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

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PQC Code	E01E
Contract Number	US2253181

Certification Audit:		Re-Certification Audit:	X	Surveillance Audit:	#	Scope extension audit:	
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Audit Summary
<p align="center">Introduction</p> <p>This report summarizes the results of the renewal audit conducted on Weyerhaeuser Plum Creek Operation's (Weyerhaeuser) SFI program for forest management. The audit was conducted on the Lake States, Appalachia, and New England resource units. Mr. Richard Boitnott, Bureau Veritas Certification lead auditor, conducted the audits on all resource units. Ms. Julie Stangell served as an audit team member on the New England resource unit. Mr. Boitnott served as lead auditor throughout the audit process. Mr. Boitnott is an SAF certified forester, a Texas accredited forester, an EMS lead auditor, and has wildlife management expertise. Ms. Stangell is a certified forester, an EMS lead auditor, and has more than 30 years experience in the forest products industry, managing timber harvest, road construction, silviculture and land use.</p> <p align="center">Audit Scope, Objectives and Process</p> <p>The scope of this audit is "land management". The audit was conducted against the SFI 2015-2019 Standard Forest Management Edition. All SFI Objectives were covered during the audit except for Objective 13. There was no substitution or modification of indicators. Specifically, two objectives of the SFI audit were to verify that the Program Participant's SFI Program is in conformance with the SFI Objectives, Performance Measures, and Indicators, and any additional indicators that the Program Participant chooses, and verify whether the Program Participant has effectively implemented its SFI Standard program requirements on the ground. Standard Bureau Veritas Certification protocols and forms were applied throughout the audit as provided by the most recent version of the Bureau Veritas Certification SFI Auditor Handbook available on the auditor access website.</p> <p align="center">Audit Plan</p> <p>The Lake States resource unit was audited July 12-14, 2016, while the West Virginia resource unit was audited August 11-12. The central office function was audited August 29, and the New England resource unit audited by two auditors August 30-September 1. An audit plan was developed and is on file with Bureau Veritas Certification</p> <p align="center">Company Information</p> <p>Weyerhaeuser Plum Creek Operations is a forest management company, managing nearly 6.3 million</p>

acres of timberlands throughout the United States. The company is based in Seattle Washington. The renewal audit process was focused on the Northern Hardwood region, consisting of the Lake States, New England, and West Virginia timberland resource units. The Lake States resource unit consists of approximately 576,000 acres, with 569,000 acres in the upper peninsula of Michigan, and 6,600 acres in Wisconsin. Its land ownership consists primarily of natural hardwood stands managed under an uneven-aged management system, aspen stands regenerated naturally, or artificially established red pine plantations.

The New England resource unit consists of approximately 960,000 acres of land, the vast majority of which is in Maine. Vermont and New Hampshire make up a much smaller portion of the ownership. The hardwood type is dominated by American beech, yellow birch, and sugar maple, with minor amounts of red oak and yellow poplar. The softwood type is dominated by red spruce and balsam fir. Natural regeneration is practiced in both types. However, there is some artificial regeneration using red pine, white spruce and hybrid aspen.

Approximately 363,000 acres of the New England resource unit is enrolled in the Moosehead Region Conservation Easement. This easement restricts development rights, and provides requirements related to public access, protection of visual quality, and protection of a number of natural features and species of concern. Weyerhaeuser works closely with a representative of the Forest Society of Maine when conducting activities within the MRCE, and consults with a management advisory team.

The West Virginia resource unit consists of a little more than 250,000 acres of land in southern West Virginia. The northern hardwood type dominates in this region, with red cherry, sugar maple, yellow birch, American beech, and red oak being the primary species. Red spruce can be found in higher elevations.

Multi-Site Requirements

The company maintains a multi-site certification consisting of 11 timberland resource units. The company recently merged with Weyerhaeuser Company, and is known as Weyerhaeuser Plum Creek Operations for a period of time. The former Plum Creek Timber Company opted to continue its existing management system. Thus this audit was conducted as if the merger had not occurred. Headquarters of the management system is in flux at this point, with the former central office of Athens Georgia having been vacated. The central office was established as Greenville Maine for the purposes of this audit. The company qualifies for multi-site sampling since the management system is controlled and directed by the central office. Each resource unit has procedures applicable to its region of operations, with oversight by the SFI manager. The SFI manager operates an internal audit program across all operating units. Resource units are responsible for developing corrective actions and reporting to the central office. The internal audit program is one upon which Bureau Veritas Certification can place a high degree of reliance to ensure continued conformance with the SFI standard.

Sites covered during the audit were selected based on a randomized schedule developed by Bureau Veritas Certification at the time of renewal, with an emphasis on sites that had experienced the longest lapse since the last audit.

Sites	Sites Audited During this Event
(central office function)	
Oregon	
Montana timberlands	
Cascades (Washington)	
Northeast (ME, NH, VT)	X

Lake States (MI, WI)	X
West Virginia	X
Crossett Arkansas	
El Dorado Arkansas	
Mississippi	
Piedmont(GA, AL)	
Coastal (GA, SC)	

Audit Results

The document review was conducted to determine if Weyerhaeuser’s system documentation continues to meet the requirements of the SFI 2015-2019 Standard Forest Management Edition. The central office audit also examined the company’s procedures for meeting multi-site requirements. The field audit consisted of a review of 33 harvesting operations, 15 regeneration/chemical application tracts, seven road projects, five special sites, and one stream enhancement project.

Objective 1-Forest Management Planning:

Weyerhaeuser continues to operate a robust inventory management and harvest scheduling system. Forest management planning includes a 3-year harvest schedule and a 15-year strategic harvest schedule. A growth and yield model is in place, although the company is examining the use of FVS in the northern hardwood region to ensure it accurately reflects growth. A GIS is in place. Land is classified through forest type and age. Soil maps are available on the GIS, with soils information in the background. A review of non-timber issues includes an analysis of conservation initiatives and easements. Weyerhaeuser has instituted a new information management system (FMS). Biodiversity at landscape scales consists of the identification of environmental constraints in the harvest planning process.

Harvest levels are within reason compared to the strategic plan. A growth versus harvest graph demonstrated the company’s harvest plan is reasonable. Growth is generally more than harvest, although there are some instances where growth is slightly less than harvest. On average, across the regions, growth exceeds harvest slightly.

Some conversion of natural hardwood stands to red pine occurs in the Lake States. There is also some conversion of forest covert types in New England. The company has a process to examine each individual conversion to ensure there is no risk of converting forest types out of compliance with regional laws and regulations, and does not impact rare species or FECVs. The company also has a program to ensure it notifies its receiving mills that any wood received from land use conversion sources does not count as SFI certified.

Objective 2-Forest Health and Productivity:

A procedure is in place to ensure artificially regenerated stands are planted within two years or two planting seasons after harvest. Natural regeneration is seldom an issue, with more than enough regeneration within five years. Harvested stands in the northern hardwood region are regenerated rapidly. Only about 4% of stands exceeded 2 growing seasons between harvest and regeneration across the company. Justifications are provided when a stand exceeds two growing seasons after time of harvest until the stand is planted. Most of the justifications are based on environmental factors, such as wet ground conditions. The West Virginia resource unit relies totally on natural regeneration, while both natural and artificial regeneration is practiced in the Lake States and New England.

Herbicide applications in the Lake States and New England resource units demonstrated minimization of chemical use. Rates are well below label maximums, and are typical for the vegetative composition of the regions. Herbicide applications are site specific, applying only the chemical needed to control vegetation on the site. Applications were very well done in the Lake States. However, chemical applications in a portion of Maine ownership demonstrated a lack of following the company's herbicide application program. Out of 320 spray units during the past two years in Maine, 41 sites demonstrated some overspray into off-target areas. However, most of these were not in areas considered high risk (i.e. no delivery to streams). Many were instances of spraying Oust within 75' of water. The new label for Oust requires a 75' buffer on aquatic vegetation. However, these water bodies most likely did not contain aquatic vegetation, so there was no violation of the label in these instances. Fifteen regeneration/chemical application units were visited during the audit and 3 had significant overspray into off-target areas. This variance in procedures was limited to one area. Other herbicide applications in the New England resource unit were very well done, indicating this was not a systemic issue. The company was issued a minor non-conformance against its herbicide application program.

Weyerhaeuser is using Rozol to control mountain beavers in Oregon. The formulation of Rozol used is not listed as a WHO Type 1A or 1B pesticide, but the company requested, and was granted, a variance for use of the chemical.

Soil productivity was very well protected in all resource units. Virtually no rutting or soil compaction was observed during the audit. Weyerhaeuser does an excellent job of utilizing soils information to determine management practices and appropriate amount of soil disturbance allowed.

Objective 3-Protection and Maintenance of Water Resources:

Compliance with state BMPs was evident on all harvest sites reviewed during the audit in all resource units. Streamside management zones were very well established, and erosion control measures were in place on roads and skid trails. Temporary stream crossings were removed and well stabilized. The use of logging slash to control erosion is a common practice throughout the northern hardwood region. We weather plans are in place, consisting of the identification of wet-weather loggable tracts, and the specification of acceptable ground conditions.

Objective 4-Conservation of Biological Diversity:

Weyerhaeuser continues to operate a robust wildlife management and biodiversity program. The company has identified potential T&E and FECVs that could occur on its land, using information from state natural heritage programs and its own knowledge. In addition, the company has incorporated species of concern that do not reach the level of a T&E species or FECV. These species are included in the company's Compliance Warning System (CWS), and are examined for treatment the same as T&E species and FECVs. .

Weyerhaeuser has done an excellent job of developing a landscape management system that analyses the company's ownership across the landscape, and then provides an analysis of T&E species, FECV, species of concern, soil types, age class distribution, and topography across each watershed landscape area. Most importantly, foresters have been trained to use this information when they plan management activities.

Stand-level wildlife habitat elements were evident on clearcut harvests reviewed in all resource units. The company does not like to leave a lot of retention on sites on which it intends to aerially apply herbicides for safety reasons. However, these clearcuts tend to be small, providing a lot of retention outside of the harvest unit. If the company does not plan to aerially apply herbicides, it leaves more

than ample stand-level retention.

Weyerhaeuser continues to be quite active in identifying and treating any significant occurrences of non-native invasive species. Employees were well aware of invasive species that could occur in their area of operations. Occurrences are treated aggressively using herbicide applications.

Objective 5-Management of Visual Quality and Recreational Benefits:

Weyerhaeuser has an aesthetic management program in place. The company has identified aesthetically sensitive areas and incorporated them into its GIS as a CWS layer. The program contains a variety of options for foresters to address visual quality. All harvest sites reviewed during the audit demonstrated an appropriate consideration for aesthetics. One harvest in the Moosehead Region Conservation Easement was reduced in size to address visual sensitivity off Moosehead lake. Another harvest left a buffer along a well-traveled road.

Average clearcut size across the company for 2015 was 60 acres. Clearcut size is regulated in the state of Maine, requiring separation zones for clearcuts of varying size class. All clearcuts reviewed during the audit demonstrated compliance with the company's green-up requirement. All clearcuts in Maine were done in compliance with the states separation zone requirements.

Objective 6-Protection of Special Sites:

Weyerhaeuser has program to identify and protect historically, culturally, and geologically unique sites on its land. It has gathered this information from the natural heritage program, or from its own discoveries. These sites are identified on the GIS, and appear as CWS layer when activities are planned in an area where a special site may be located.

Objective 7-Efficient Use of Fiber Resources:

Utilization was acceptable on all harvest sites observed during the audit.

Objective 8: Recognize and Respect Indigenous People's Rights:

Weyerhaeuser has a policy in place to respect the rights of indigenous peoples. The company demonstrated it is well aware of traditional forest-related knowledge of local tribes. The company has a defined process for receiving and responding to inquiries from indigenous peoples

Objective 9-Legal and Regulatory Compliance:

The environmental action plans provide access to applicable laws and regulations. The company's system for ensuring regulatory compliance consists of training, contractual requirements, pre-harvest planning processes, and inspection procedures. An internal audit procedure is also in place to monitor compliance with applicable regulatory requirements.

The company has a written policy in place to comply with social laws. Weyerhaeuser has received no communication from interested parties concerning it or its supplier's performance relative to IOL core conventions.

Objective 10-Forestry Research, Science and Technology:

Weyerhaeuser is a member of NCASI, which provides for research in a number of forestry-related issues. The company is directly involved in a number of research efforts regarding tree improvement, silviculture, and wildlife and biodiversity. The company produced evidence it has

access to the potential effects of climate change on forests and forest productivity, and wildlife and wildlife habitat.

Objective 11-Training and Education:

A statement of commitment to the SFIS 2015-2019 standard was in evidence in the Sustainability Report. Weyerhaeuser has a training program that identifies the requirements for all personnel. Training records provided evidence that employees have been trained as required by its training program. The company requires loggers to have at least one person on each job who maintains current training status. Weyerhaeuser's written agreement with loggers contains a requirement for the use of qualified loggers.

Objective 12-Community Involvement and Landowner Outreach:

Weyerhaeuser is a member of all SICs in states in which it operates. Its financial support of SICs includes the development and distribution of landowner materials that contain information on the conservation of biological diversity. The company is very involved in a number of conservation planning efforts. The company has five conservation easements in Maine alone.

Objective 13: Public Land Management Responsibilities: N/A

Objective 14-Communications and Public Reporting:

A review of the SFI, Inc. website provided evidence the former Plum Creek Timber Company submitted its 2015 surveillance audit report as required for public review. The company has procedures in place to provide for all the pieces of information needed to complete the SFI annual progress report. An e-mail transmission from SFI, Inc. provided evidence the company submitted the 2015 annual progress report in a timely manner.

Objective 15-Management Review:

Weyerhaeuser has a management review process in place that is two-tiered, with an SFI team responsible for developing policies, program and procedures and evaluating conformance with its program, followed by a review with top management on the overall results of its SFI program. The company has developed an internal audit process to evaluate progress towards achieving conformance with its own SFI program and achieving SFI objectives. Evidence was presented indicating the company does a very good job of using its internal audit program to help drive continual improvement in the field. The company conducts management review at least annually. .

Findings

Previous non-conformances:

No non-conformances were issued during the previous audit.

Non-conformances:

One minor non-conformance was issued during this audit event due to a failure to follow herbicide application procedures.

Opportunities for Improvement:

Three opportunities for improvement were issued. These should be considered in light of how they may effect conformance in the future.

1. PM 3.2, Ind 1: While the use of open deck bridges is allowed by the Vermont BMP manual, the organization may wish to consider taking measures to prevent the possibility of sediment entering water from bridges with open decks.
2. PM 11.2., Ind 1: The West Virginia SIC requires recertification every 4 years in lieu of a continuing education component. It is questionable as to whether requiring recertification every four years meets the intent of the SFI Standard's requirement for a continuing education component. Weyerhaeuser should consider working with the West Virginia SIC to review the status of its training program in light of the requirements of this indicator, and add a continuing education component if the current program is determined to not meet the spirit of the SFI Standard.
3. PM 4.2, Ind. 2: The company had 3 instances of incursions into MNAP features without consulting Maine Natural Areas Program as required by the Moosehead Region Conservation Easement. These incursions were very minor, typically less than 1 acre, and an interview with a representative of the Forest Society of Maine indicate no resource damage was involved. However, Weyerhaeuser should examine its procedures for operating near MNAP features to ensure it obtains proper consultation prior to conducting activities near such features.

Notable Practices:

Three notable practices were issued:

1. PM 3.2, Ind. 1: The Appalachia resource unit has developed a unique risk assessment to help determine how to manage each harvest unit. The assessment evaluates the risk to water quality for each unit, and determines how to manage that risk based on the assessment. The assessment includes other attributes, such as aesthetics, slopes, and wildlife values, but the highest risk ratings occur due to water quality issues.
2. PM 4.2, Ind. 1: Weyerhaeuser continues to make an excellent effort to not only protect T&E species, but to take measures to enhance their habitat and ensure their continued survival, and possible recovery. This is especially evident in the company's efforts around the Kirkland's Warbler. Weyerhaeuser has taken commendable efforts to establish jack pine in a pattern that enhances Kirkland's Warbler habitat. This innovative approach to jack pine establishment creates the small openings and edge habitat preferred by this endangered species.
3. PM 3.2, Ind. 2: The use of pdf maps on tablets by feller buncher operators helps eliminate to the extent possible any incursion into streams, lakes or other water bodies. This also helps prevent incursion into wildlife features.

Logo/label use:

Plum Creek uses the SFI certified sourcing label with approval from SFI, Inc. The SFI logo is used for promotional purposes, also with approval. No unauthorized use of the SFI logo was observed. The company does not use the Bureau Veritas Certification logo.

SFI reporting:

The 2015 surveillance audit report was posted on the SFI, Inc. website as required for public review. In addition, the company posted the special surveillance audit report issued in March 2015.

Conclusions

Results of the audit indicate Weyerhaeuser Plum Creek Operations has developed and implemented an SFI program that meets the requirements of the SFI 2015-2019 standard, with the exception of one minor non-conformance. A root cause analysis and corrective action plan was developed prior to submission of the audit report. The company is now recommended for immediate recertification to the SFI 2015-2019 Standard Forest Management Edition.

SEE SF61s FOR AUDIT NOTES

Summary of Audit Findings:										
Audit Date(s):		From: 7/12/2016 (Lake States) 8/11/2016 (West Virginia) 8/29/2016 (HQ) 8/30/2016 (New England)				To: 7/14/2016 (Lake States) 8/12/2016 (West Virginia) 8/29/2016 (HQ) 9/1/2016 (New England)				
Number of SF02's Raised:					Major:		0		Minor:	1
Is a follow up visit required:			Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Date(s) of follow up visit:			
Follow-up visit remarks:										
Team Leader Recommendation:										
Corrective Action Plan(s) Accepted			Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	Date:	9/10/2016
Proceed to/Continue Certification			Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	Date:	9/10/2016
All NCR's Closed			Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	Date:	
Standard audit conducted against:										
1)	SFIS 2015-2019 FM Edition			3)						
2)				4)						
Team Leader (1):			Team Members (2,3,4...)							
Richard Boitnott; CF, AF, EMS(LA)			2) Julie Stangell; CF, EMS (LA)							
			3)							
			4)							
			5)							
Scope of Supply: (scope statement must be verified and appear in the space below)										
Land management										
Accreditation's		ANAB								
Number of Certificates		1								
Proposed Date for Next Audit Event										
Date	TBD									
Audit Report Distribution										
Bureau Veritas Certification: Dawn Komnick-dawn.komnick@us.bureauveritas.com										
Weyerhaeuser: Rosemary Daszkiewicz- rosemary.daszkiewicz @weyerhaeuser.com										

Clause	Audit Report
Opening Meeting	<p>Participants: Tommy Tadlock, Duane Anderson, Conner Fristoe, Kit Hart, Pat Todd, Elizabeth Berquist, Zach Hiatt, Ben Dow, Lorin Hicks, Henning Stabins, Rosemary Daszkiewicz, Kat Simms, Scott Henker, Bryan Hulka, Dale Hogg, Brian Sugden, Frank Cuff, mark Doty, Randy Taylor</p> <p>Discussions:</p> <ul style="list-style-type: none"> ➤ Introductions and appreciation for selecting Bureau Veritas Certification ➤ Scope of the audit ➤ Audit schedule/plan ➤ Nonconformance types – Major / Minor ➤ Review of previous nonconformances - 0. ➤ Process approach to auditing and audit sampling ➤ Confidentiality agreement ➤ Termination of the audit ➤ Appeals process ➤ Closing meeting timing
Closing Meeting	<p>Participants: Frank Cuff, John Ackley, Tricia Quinn, Ben Dow, Lorin Hicks, Henning Stabins, Rosemary Daszkiewicz, Kat Simms, Scott Henker, Steve Pollis, Bryon Hulka, Kit Hart, Bill Dempsey, Chris Fife, Charlie Becker, Nathan Christie, Ed Meadow, Brian Sugden, Casey Olczak</p> <p>Discussions:</p> <ul style="list-style-type: none"> ➤ Introductions and appreciation for selecting Bureau Veritas Certification. ➤ Review of audit process - process approach and sampling. ➤ Review of OFIs and System Strengths ➤ Nonconformances - 1 ➤ Date for next audit. ➤ Reporting protocol and timing



SF02/NA NONCONFORMITY REPORT

Company Name and Site:		SF02#:	
Weyerhaeuser-Plum Creek operations		01	
Contract #:	Type of audit (e.g., initial, surveillance):	Team Leader:	
US2253181	Renewal	Richard Boitnott	
Date:	Standard and Clause #:	Team Member:	
9/1/2016	SFIS PM 2.2, Ind 8		
Major	Minor	Other Documents (if applicable):	Company Representative:
	X		Lorin Hicks
REQUIREMENT OF AUDITED STANDARD:			
PM 2.2, Ind. 8 requires the company to use BMPs during herbicide applications			
OBSERVED NONCONFORMITY:			
During the audit, off-target applications were observed on 3 sites of 320 sprayed the previous 2 years. The company did not follow their own herbicide application guidelines on these sites.			
ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION PLAN (To be completed by the Company. Plan to be submitted in 30 days)			
Corrective Action Plan Date:	9/9/2016	Company Representative:	Lorin Hicks
Root Cause Analysis and Corrective Action			

Root Cause: Prior to the audit, Weyerhaeuser identified and self-reported concerns over 12 sites from its 2014 aerial spray project and 29 sites from its 2015 aerial spray project in the Moosehead region of Maine. (Weyerhaeuser also self-reported these concerns to the Forest Society of Maine [its Conservation Easement partner] and the Maine Board of Pesticides Control.) After discovery, Weyerhaeuser conducted an internal investigation and root cause analysis. The root cause analysis concluded that the primary cause was a single employee who did not follow Weyerhaeuser’s internal procedures to identify sensitive features and avoid spraying in off-target areas. The evidence showed that although the employee received training and was aware of company procedures, he sometimes skipped required steps to identify and avoid sensitive areas (such as walking each proposed spray unit), while assuring supervisors and colleagues that the required work was being performed. This employee had primary responsibility for planning, executing, and overseeing the Moosehead region aerial spray program. Although this employee’s conduct was determined to be the primary cause, contributing factors included the failure of supervisors to independently verify that the reported work had, in fact, been completed, and a lack of adequate participation/auditing of the Moosehead region spray projects by other employees. In addition, pilot error and/or failure to follow contractual requirements by the aerial spraying contractor were contributing factors on some sites.

Corrective Action Plan:

Prior to discovery, Weyerhaeuser had already implemented the following changes for the 2016 spray program in Maine as part of efforts toward continuous improvement:

- Met with aerial spraying contractor to review results of 2015 spray program, share performance concerns, explain new “ringing” requirement (discussed below) and reiterate expectations; Weyerhaeuser requested that the pilot who performed the 2015 spray project not return due to performance concerns, to which the contractor agreed;
- Implemented a “ringing” requirement around the external boundary of each spray unit to reduce the risk of overspray; and
- Required daily downloads/delivery of AgNav “boom on” shapefiles as evidence of spray pattern beginning with the release spray project in September 2016.

After discovery, Weyerhaeuser implemented the following interim corrective actions to prevent any similar concerns with the 2016 spray project:

- Reviewed each proposed 2016 spray unit in the Moosehead region and inspected it on the ground to ensure sensitive features and other off-target areas were correctly identified and buffered; multiple employees participated in this effort;
- Audited 10% of the proposed 2016 spray units in the Bingham region, including an on-the-ground inspection;

Based on the root cause analysis, Weyerhaeuser intends to implement the following additional corrective actions:

- Decentralizing work related to the herbicide program within the Moosehead region so that more employees are involved in the planning, execution, and oversight of the aerial spray program; this may involve team restructuring and/or changes to individual employees’ responsibilities;
- Requiring that the responsible forester (as part of the checklist discussed below) verify in writing that he or she walked each proposed spray unit and correctly identified and buffered boundaries and sensitive areas; Weyerhaeuser will also evaluate the use of technology to audit/verify completion of this work;
- Develop and implement a checklist for each spray unit that reflects Weyerhaeuser’s internal procedures and BMPs; the checklist will require individual accountability for each step and will reduce the likelihood that steps will be overlooked; completion of the checklist will require involvement of the silvicultural forester, assisting foresters, and unit supervisor; the silviculture program manager will confirm completion of the checklist before the start of any herbicide application;
- Require that post-spray efficacy checks involve multiple employees and specifically check for adequate buffering of unit boundaries and sensitive features;
- Annual internal SFI performance audits will include more aerial spray units, selected based on a risk assessment.

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: Very well done. It would have been easy to put it all on one employee, but they looked a little harder at other root causes

Corrective Action Plan: Acceptable

Plan Accepted:	Yes	X	No		Comments:	
Auditor:	Richard Boitnott				Date:	9/10/2016

CORRECTIVE ACTION IMPLEMENTATION													
To be completed by Company – Provide objective evidence. Not to exceed: 90 Days <input type="checkbox"/> 1 Year <input checked="" type="checkbox"/>													
Corrective Action Completion Date:					Company Representative:								
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	
Follow Up Comments:													
Auditor:							Date:						