



Management System Certification Audit Summary Report

Organization:	Robbins Lumber Company		
Address:	P.O. Box 9, Searsmont, Maine 04973		
Standard(s):	Sustainable Forestry Initiative Standard, 2005-2009 Edition		
Representative:	Peter Jolliffe		
Site(s) audited:	Fee Lands and Searsmont Mill Procurement System	Date(s) of audit(s):	August 23-25, 2005
EAC Code:		NACE Code:	
Lead auditor:	Daniel J. Simonds, EMS-AA	Additional team member(s):	Charles Levesque, EMS-LA; Mariko Yamasaki, Technical Expert
This report is confidential and distribution is limited to the audit team, client representative and the SGS office.			

1. Audit objectives

The objectives of this audit were:

- to confirm that the management system and field implementation conforms with all the requirements of the audit standard;
- to confirm that the organization has effectively implemented the planned management system;
- to confirm that the management system is capable of achieving the organization's policy objectives.

2. Scope of certification

Robbins Lumber Company Fee Land Management (25,000ac) and Searsmont Mill Procurement System.

(Christmas Tree cultivation operations are NOT included in this scope)

This is a multi-site audit and an Appendix listing all relevant sites and/or remote locations has been established (attached) and agreed with the client Yes No

3. Current audit findings and conclusions

The audit team conducted a process and field implementation-based audit focusing on significant aspects/risks/objectives required by the standard(s). The audit methods used were interviews, observation of activities and review of documentation and records.

The structure of the audit was in accordance with the audit plan and audit planning matrix included as annexes to this summary report.

The audit team concludes that the organization has has not established and maintained its management system in conformance with the requirements of the standard and demonstrated the ability of the system to systematically achieve agreed requirements for products or services within the scope and the organization's policy and objectives.

Number of nonconformities identified: _____ Major 3 Minor

Therefore the audit team recommends that, based on the results of this audit and the system's demonstrated state of development and maturity, management system certification be:

Granted / Continued / Withheld / Suspended until satisfactory corrective action is completed.

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4. Previous Audit Results

The results of the last audit of this system have been reviewed, in particular to assure appropriate correction and corrective action has been implemented to address any nonconformity identified. This review has concluded that:

- Any nonconformity identified during previous audits has been corrected and the corrective action continues to be effective.
- The management system has not adequately addressed nonconformity identified during previous audit activities and the specific issue has been re-defined in the nonconformity section of this report.

5. Audit Findings

The audit team conducted a process and field implementation-based audit focusing on significant aspects/risks/objectives. The audit methods used were interviews, observation of activities and review of documentation and records.

The management system documentation demonstrated conformity with the requirements of the audit standard and provided sufficient structure to support implementation and maintenance of the management system. Yes No

The organization has demonstrated effective implementation and maintenance / improvement of its management system. Yes No

The organization has demonstrated the establishment and tracking of appropriate key performance objectives and targets and monitored progress towards their achievement. Yes No

The internal audit program has been fully implemented and demonstrates effectiveness as a tool for maintaining and improving the management system. Yes No

The management review process demonstrated capability to ensure the continuing suitability, adequacy and effectiveness of the management system. Yes No

Throughout the audit process, the management system demonstrated overall conformance with the requirements of the audit standard. Yes No

Certification claims are accurate and in accordance with SGS guidance N/A Yes No

6. Significant Audit Trails Followed

The specific processes, activities and functions reviewed are detailed in the attached Audit Plan. In performing the audit, various audit trails and linkages were developed, including the following primary audit trails, followed throughout:

Opening Meeting: An opening meeting was held at Robbins Lumber Co. Searsmont office on the morning of day 1 of the audit. Staff were introduced and audit process explained by the audit team.

Document Review: Primary management system documentation (Robbins Lumber Co. Inc., SF Guidelines) and available written evidence of conformance was requested prior to the main audit and evaluated off-site. On day 1 of the audit, following the opening meeting, the lead auditor completed this phase of the audit with the assistance of RLI SFI coordinator, Peter Jolliffe and other RLI staff. This document review provided evidence necessary to close most elements of Objectives 1, 9, 10, 11, 12 & 13 of the SFI Standard.

Searsmont Area Fee Lands: Assessment of the management of local area fee lands was accomplished during day 1 of the audit by a field tour conducted during from late morning until evening. This phase was lead by auditor Levesque, assisted by Technical Expert Yamasaki. Six sites were visited and foresters and contractors interviewed.

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Nictous Area Fee Lands: A full day tour of operations on Nictous Area lands was conducted on day 2 by Simonds and Yamasaki. Particular focus was on Objectives 2,3,4, 5, 6 &7. Management systems of the contracted land manager were reviewed and inspected in practice. Review of the requirements of the conservation easement of these lands were also assessed. Eight sites were visited and foresters, contractors, and easement monitors interviewed.

Searsmont Mill Gatewood Procurement: Procurement Procedures were reviewed by document review and in practice during days 2 and 3 of the audit. Levesque visited a sample of harvest sites on day 2, and Simonds enlarged the sample on day 3. In total, 13 sites were visited and contractors and landowners interviewed.

Searsmont Mill Stumpage Procurement: The significant supply of wood represented by stumpage purchase was investigated by Levesque and Yamasaki on day 3. 5 sites were visited, foresters and contractors were interviewed.

Closing Meeting: An audit summary and preliminary results were presented at the closing meeting held in Cornish, Maine on the afternoon of day 3. Audit findings, including findings of non-conformity, were explained and discussed.

7. Nonconformities

NonConformity N° 1 of 3

Major Minor

Department / Function: Fee Lands Management Standard Ref.: SFIS 3.1, Indicator 1

Document Ref.: *Maine Dept. of Conservation, Best Management Practices for Forestry:* Issue / Rev. Status:

Pg. 61; Old Roads, (1)
Pg. 70; Maintain It, (2)
Robbins Lumber Inc., SFG 3.1-4

Details of Nonconformity: The standard requires a "Program to implement state...BMPs during all phases of management activities. State BMPs include requirements to "Determine if old roads can be re-used or upgraded with minimal impacts to water quality" and to "regrade the road surface if the crown is lost from heavy use." Additionally, Robbins Lumber SF Guidelines state that "before...any logging operations, all roads and bridges to be crossed will be checked for BMP effectiveness."

On the Nictous property, a short road segment (20-30 feet) was observed to be in degraded condition causing water to collect in the road surface directly adjacent to and in close proximity to a small open wetland. This road had been used during the previous season for hauling of gravel for a nearby road upgrade project and plans are in place to use this road for harvesting operations planned for 2005 or 2006. Although no evidence of impact to the adjacent wetland was observed, the need for maintenance of this road segment is quite apparent, indicating incomplete implementation of the BMPs as required.

NonConformity N° 2 of 3

Major Minor

Department / Function: Searsmont Mill Procurement (Stumpage) Standard Ref.: SFIS 11.1, Indicator 3

Document Ref.: MFS Admin. Settlement Issue / Rev.

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Agreement and associated notes Status:
related to FPA violation on
LaValley lot #40

Details of
Nonconformity:

The standard requires a "Demonstration of commitment to legal compliance through available regulatory action information."

Available regulatory action information includes a finding by the Maine Forest Service of a violation of the Maine Forest Practices Act Clearcut regulations on LaValley lot #40 during 2002 – a property on which Robbins Lumber had stumpage rights and contractual responsibility for conducting the harvest.

The agreed consent agreement executed and documented with the Maine Forest Service in 2003 includes appropriate and adequate corrective actions to address this non-conformity. These corrective actions include engagement of a consulting forester to supervise stumpage harvests under the LaValley contract, and implementation of harvest monitoring on these operations.

Corrective Actions being complete and adequate at the time of the audit, this Non-conformity is considered closed.

NonConformity

N° 3 of 3

Major

Minor

Department /
Function:

Searsmont Mill Procurement

Standard

SFIS 8.1, Indicator 1

Document Ref.:

Ref.:

Issue / Rev.

Status:

Details of
Nonconformity:

The standard requires a "Program to supply regionally appropriate information or services to forest landowners, describing the importance and providing implementation guidance on a) BMPs, b) reforestation, c) visual quality mgmt., d) conservation..."

While Robbins Lumber has a program to supply information and services as specified, this program is currently only reaching landowners associated with its stumpage and landowner assistance programs. Landowners supplying gatewood to the Searsmont mill have not been included in this outreach program.

Because gatewood now comprises a large majority of the logs supplied to the Searsmont mill, an information program that does not include these landowners does not constitute an effective implementation of this standard element.

Nonconformities detailed here shall be addressed through the organization's corrective action process, in accordance with the relevant corrective action requirements of the audit standard, including actions to prevent recurrence, and complete records maintained.

- Corrective actions to address identified major nonconformities shall be carried out immediately and SGS notified of the actions taken within 30 days. An SGS auditor will perform a **follow up visit** within 90 days to confirm the actions taken, evaluate their effectiveness, and determine whether certification can be granted or continued.
- Corrective actions to address identified major nonconformities shall be carried out immediately and **records with supporting evidence sent to the SGS auditor** for close-out within 90 days.

At the next scheduled audit visit, the SGS audit team will follow up on *all* identified nonconformities to confirm the effectiveness of the corrective actions taken.

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8. General Observations & Opportunities for Improvement

Objective 1 – Long-term management planning

Robbins Lumber Company has developed and implemented a state-of-the-art inventory and strategic planning program that is quite ambitious for an ownership of their scale. This system utilizes up to date stand assessment and modelling products, appropriately applied with the assistance of a reliable local consulting firm with national reputation. Linkage of this strategic planning with tactical and operational activities is accomplished with the aid of an exemplary GIS system which creatively combines proprietary information with an extensive array of publicly-available data in a user-friendly, practical format. Evidence indicates that this system is fully implemented and functioning well.

Objective 2 – Reforestation, chemical use, soil productivity, and pest management

Harvest and regeneration systems appeared in every case to be thoughtfully applied and have solid silvicultural basis. Criteria for regeneration evaluation is simple, but effective and is achieving good results that conform to management objectives and SFI standard requirements. Evidence of creativity and innovation were common. Robbins Lumber demonstrated an active and responsible policy for understanding and managing the effects of forest pests and diseases. These programs showed clear evidence of the principals of integrated pest management, including the prudent, responsible, and compliant use of chemical pesticides. Good integration of soils information into harvest and regeneration planning demonstrated a clear commitment to long-term conservation of productivity.

Objective 3 – Water Quality and BMP implementation

Robbins Lumber clearly has put water quality protection front and center in its implementation of the SFI Program Standard. Knowledge of BMPs by staff and contractors is good and implementation demonstrated the knowledge on the numerous fee field sites observed. A minor non-conformity on a road in Nicatous was an isolated lapse of BMP implementation. BMP implementation is required in all contracts with loggers for forest harvesting operations. Robbins owns and uses a series of truck-body and wooden skidder bridges (seen in several locations in use) to cross streams during harvesting. They often lend these to any loggers who request use of them. Re-construction of the main access truck road into the Sheldon Lot indicated exemplary use of BMPs. Lastly, sophisticated GIS mapping capabilities add to the protection of water quality by assuring staff and contractors have the latest information on water resources.

Objective 4 - Wildlife habitats and biological diversity conservation

Robbins Lumber Company forestry staff has developed a first-rate inventory and documentation process for significant and essential wildlife habitat areas, water resources and riparian habitats, and exemplary natural communities on fee lands and off that utilize the *Beginning with Habitat* consolidated work products. Up-to-date map products are available to field foresters, interested landowners, and contractors, who become aware of these types of habitat considerations very early in the management planning process. Forestry staff has established pre-harvest evaluation procedures to identify any threatened and endangered species, known special habitat areas, resource protection zones as part of the planning process. Thus harvest plans can incorporate stand- and landscape level measures to both promote habitat diversity and conserve important terrestrial and aquatic habitats for the plant and animal species that use those habitats. Robbins Lumber Company continues to support the Maine Cooperative Forest Research Unit and Manomet Center for Conservation Sciences and the research outputs from those organizations. The Nicatous Conservation Easement, held by the Forest Society of Maine demonstrates the imagination and creativity of all stakeholders in identifying, promoting, and conserving current as well as future special wildlife habitat and on a working forest landscape. Forest management expertise and system support of biological diversity objectives on the Nicatous lands appears strong and committed despite the ever-evolving ownership situation.

Objective 5 – visual impacts

Robbins Lumber's program to address visual quality management is simple, but clearly effective. Evidence clearly indicates that visual criteria and aesthetic values are fully implemented into the harvest planning process. Observations indicate that this program is yielding good results.

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Objective 6 – Special Sites

Robbins Lumber Company forest staff utilizes the *Beginning with Habitat* consolidated work products to map special sites identified by the Maine Natural Areas, Inland Fisheries and Wildlife, and Historic Preservation programs, as well as features of special local interest on fee lands. Impressive, up-to-date map products are available through forestry staff’s state-of-the-art GIS technology, on and off fee lands. Lot management plans and pre-harvest evaluation procedures track these features. Awareness of these features and a committed approach to protecting site integrity is very evident in Robbins Lumber Company forestry staff personnel. Forest management expertise and system support of the special areas program objectives on the Nictous lands appears strong and committed despite the ever-evolving ownership situation. .

Objective 7 - Utilization

Those working in much of Maine and New Hampshire are blessed with a plethora of wood markets. As a result, Robbins Lumber Co. utilizes extremely well every product harvested from company owned lands, no matter what the species or quality. Landings are all free of marketable logging debris as are in-woods operations. The company purchases other species in addition to white pine that it saws at the mill to assist loggers in marketing all of the wood harvested (company lands or not). The sawmill utilization is top-notch and about to be refined further with a major mill upgrade that will use computer optimization technology. The company energy/co-generation plant assures further that all low-grade materials are utilized. Contracts with outside loggers include clear utilization clauses and, on company lands, all trees are marked in anticipation of markets in addition to fulfilling silvicultural objectives.

Objective 8 - Procurement

Supplying over 20 million board feet of white pine to the Robbins mill each year in the face of stiff competition from several large companies within the company procurement radius is a challenging job. Doing this while assuring conformance with the SFI Objectives, is more challenging. Robbins has built a system that conforms to the SFI Program Standard through:

- providing information to landowners about BMPs, regeneration, visual quality management and wildlife management (a minor non-conformance in the area of better reaching the pure gatewood component of its procurement area will complete the system when corrected).
- Working with and recommending to landowners loggers who are trained in BMP implementation and other skill areas (most are CLP trained).
- Having clear contracts with loggers on stumpage operations.
- A thorough field monitoring system of non-fee lands from which wood comes to the Robbins mill.
- Having professional foresters involved in many of the gatewood and all of the stumpage sale procured wood operations.

Objective 9 – Forest research support

Robbins Lumber addresses the requirements of this indicator through as appropriate level of support of the University of Maine Cooperative Forestry Research Unit, and the Manomet Center for Conservation Sciences. Past and ongoing work of these two leading institutions is fully meets the requirements of this standard.

Objective 10 – Training and education

Program commitment and support from upper management for the SFI program is made clear both through formal policy statements and direct involvement of key decision makers. Robbins forestry staff – made up of direct professional staff and contracted partners – showed consistently high levels of training and competence in all areas of SFI conformance. Roles and responsibilities are clearly and appropriately assigned and understood. Appropriate training records are readily available and show an active commitment to ongoing education. In addition to profession staff, training efforts have been directed at logging contractors as well. Field interviews showed evidence of effective communication with loggers and ongoing efforts to encourage training and professionalism.

Objective 11 – Commitment to compliance

Robbins Lumber company demonstrated a generally effective system for achieving and maintaining compliance with laws and regulations that apply to their operations. Staff displayed detailed understandings of legal responsibilities and planning documents showed ample evidence that legal compliance is a central objective of their operations. A documented violation of Maine’s Forest Practices Act on a stumpage site lead to the raising of a minor Non-Conformity (#2). This non-conformity is considered an isolated lapse,

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however, and the forthright corrective actions taken by Robbins allow the non-conformity to be considered closed.

Objective 12 – SFI program support and reporting

Robbins Lumber is an active supporter of the Maine SIC, and related educational and outreach activities in the region. Records of SIC participation, support, and involvement were readily available. Additionally, Robbins has a deserved reputation as a leader in public outreach in the industry; maintaining ongoing programs for education and formal and informal communication in communities effected by its operations. Records of required reporting were available and in order.

Objective 13 – Management review and continuous improvement

The Management Review system employed by Robbins Lumber for their SFI program is best described as simple but effective. Still relatively new in its implementation, it has yet to become fully mature. It can, however, be considered to be effectively implemented. Evidence of review meeting show a clear trail of adaptive management leading to needed adjustments and new approaches to problems. Continued application is likely to yield continued improvement.

Observations:

- (1) During the course of the field audit, several sites were observed where the use of ATV's on Robbins Lumber Company lands had caused site damage and created erosion and water quality hazards. In particular, an old trail on the Callahan Lot had been heavily used by ATVs to the extent of causing significant rutting in a small forested wetland site. Other examples include damage to a vernal pool on the Munson Lot and an ATV trail crossing a large open wetland on the Nicatous property. This trail (though not part of harvesting activities) represent clear violations of the BMP guidelines for timber harvesting, and are cause for significant concern. Because it is clear that Robbins is aware of this challenging issue and attempting to deal with it through outreach to local ATV users, this issue is not raised as a non-conformity. There is significant risk, however, of non-conformity against SFIS elements 3.1.1 (BMP implementation) and 2.3.3 (erosion control measures).

Attachments:

- 1)SGS Systems and Services Certification - 2005-2009 SFIS - SFI Conformance Checklist – Robbins Lumber Co.
- 2)GS0307 – Audit Plan - Robbins

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