

FOREST MANAGEMENT CERTIFICATION REPORT**SECTION A: PUBLIC SUMMARY**

Project Nr:	12396-UG		
Client:	Busoga Forestry Company		
Web Page:	www.greenresources.no		
Address:	P. O Box 1900, Jinja		
Country:	Uganda		
Certificate Nr.	SGS-FM/CoC-008691	Certificate Type:	Forest Management
Date of Issue	15 April 2011	Date of expiry:	14 April 2016
Evaluation Standard	SGS Qualifor Forest Management Standard for Uganda 2010, AD 33-UG-03 of 29 March 2010.		
Forest Zone:	Tropical		
Total Certified Area	10 282 ha		
Scope:	Forest Management of Busoga Forestry Company's forests and plantations in the Mayuge and Dokolo districts of Uganda for the production and sale of softwood and hardwood timber in the Bukaleba and Kachung Forest Reserves.		
Location of the FMUs included in the scope	Bukaleba Central Forest Reserve is near the town of Jinja in central Uganda. Kachung Central Forest Reserve is located near the town of Lira in northern Uganda.		
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Evaluation dates:			
Main Evaluation	9 – 11 March 2010		
Surveillance 1	1-4 August 2011		
Surveillance 2			

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Surveillance 3

Surveillance 4

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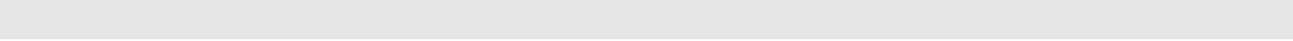


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ASSOCIATED DOCUMENTS (not part of the Public Summary)

AD 20:	Evaluation Itinerary
AD 21:	Attendance Record
AD 36-B:	Evaluation - Observations and Information on Logistics
AD 38:	Peer Review Report
AD 40:	Stakeholder Reports



Complaints and Disputes

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INTRODUCTION

The purpose of the evaluation was to evaluate the operations of Busoga Forestry Company against the requirements of the QUALIFOR Programme, the SGS Group's forest certification programme accredited by Forest Stewardship Council.

1. SCOPE OF CERTIFICATE

The scope of the certificate falls within the Tropical Forest Zone and includes one Forest Management Unit as described below.

Description of FMUs:				
Description	Ownership	Area (ha)	Longitude E	Latitude N
Bukaleba Plantation	State	7 613	33° 23'	0° 22'
Kachung Plantation	State	2 669	32° 56'	2° 01'
Total		10 282		

Size of FMUs:		
	Nr of FMUs	Area (ha)
Less than 100 ha		0
100 to 1 000 ha in area		0
1 001 to 10 000 ha in area	2	10 282
More than 10 000 ha in area		0
Total	2	10 282

Total Area in the Scope of the Certificate that is:	
	Area (ha)
Privately managed	10 282
State Managed	0
Community Managed	0

Composition of the Certified Forest(s)	
	Area (ha)
Area of forest protected from commercial harvesting of timber and managed primarily for conservation objectives	1 584
Area of forest protected from commercial harvesting of timber and managed primarily for production of NTFPs or services	0
Area of forest classified as "high conservation value forest"	1 102
Area of non-forest managed primarily for conservation objectives	932
Total area of production forest (i.e. forest from which timber may be harvested)	7 066

Composition of the Certified Forest(s)	
	Area (ha)
Area of production forest classified as "plantation"	7 066
Area of production forest regenerated primarily by replanting	7 066
Area of production forest regenerate primarily by natural regeneration	0

List of High Conservation Values	
Description	Notes
Forest areas containing nationally significant concentrations of biodiversity values.	High biodiversity is found throughout the different vegetation types within the Imanyiro peninsula woodland which have different species richness each one representing a unique ecosystem.

List of Timber Product Categories				
Product Class	Product Type	Trade Name	Category	Species
Wood in the rough	Logs non-coniferous wood	Poles and Saw logs	Deciduous (Hardwood)	<i>Eucalyptus grandis</i>
Wood in the rough	Logs of coniferous	Sawlogs	Conifer	<i>Pinus caribaea</i>
Wood in the rough	Logs non-coniferous wood	Sawlogs	Deciduous (Hardwood)	<i>Maesopsis eminii</i>

Annual Timber Production				
Species (botanical name)	Species (common name)	Area (ha)	Maximum Annual Sustainable Yield (m ³)	
			Projected	Actual
<i>Eucalyptus grandis</i>	Eucalyptus	1 380	20 000	1 700
<i>Maesopsis eminii</i>	Maesopsis	330	3 000	0
<i>Pinus caribaea</i>	Pine	4 980	109 000	0
Totals		6 690 ¹	132 000	1 700 ¹

¹ As at 30/06/2011

Approximate Annual Commercial Production of Non-Timber-Forest-Products				
Product	Species		Unit of measure	Total units
	Botanical Name	Common Name)		
				Nil

Lists of Pesticides										
Product Name	Quantity Used (litre)					Area of application (ha)				
	MA	SA1	SA2	SA3	SA4	MA	SA1	SA2	SA3	SA4
Roundup (Glyphosate)	600	7 912				450	1 020			
Nimrod 25 EC (Bupirimate)		5					1 nursery			
Confidor SL200 (Imidacloprid)		307					Logs sprayed			

2. COMPANY BACKGROUND

2.1 Ownership

Busoga Forestry Company (BFC) is wholly owned by Green Resources AS of Norway as a plantation, carbon offset, forest product and renewable energy company. BFC was established in 1996 and is a private, profit oriented company and its primary objective is to establish and manage commercial forest plantations in order to produce forest products for domestic use and export, carbon storage, environmental conservation and social economic development to the surrounding area.

The company acquired a lease permit of fifty years (50) from the Government of Uganda for forestry development in Bukaleba Central Forest Reserve. BFC is responsible for the establishment and management of forest plantations for carbon offsets, quality forest products and environmental protection.

2.2 Company Key Objectives

Objective	Notes
Commercial	
To establish and manage commercial forest plantations for the production of maximum volumes of sawlogs and transmission poles. The species grown will take into account the ecological suitability of the micro sites.	
Sustain the supply of wood resources in Uganda.	
Social	
To demonstrate and promote tree planting/ afforestation activities to the local communities through Participatory Forest Management (PFM) and to facilitate social economic development	
To facilitate socio-economic development and poverty eradication among rural communities in Uganda through active participation in community development programs.	
Environmental	
To contribute to global environment protection by reducing greenhouse gas emissions through tree planting.	
Conservation of the environment and increasing biodiversity of its forests.	

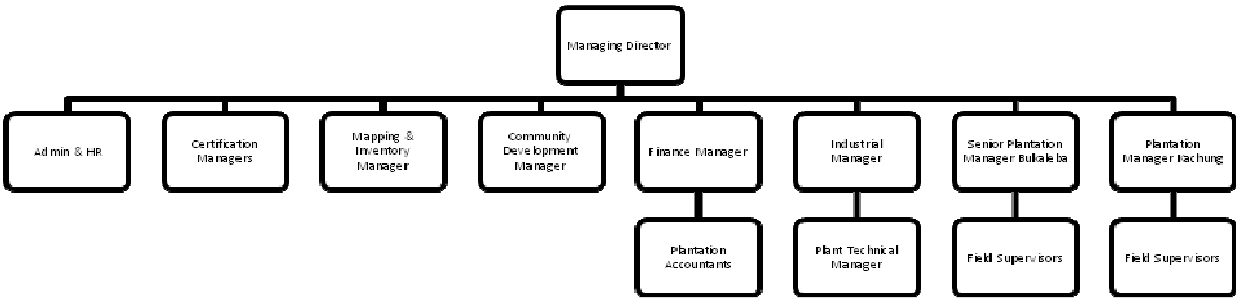
2.3 Company History

Busoga Forest Company was established in 1996 as a subsidiary of Tree farm AS Norway. The initial permit was for 5 165 ha, but the company also acquired another 4 000 ha from Duetche Forest Consultant in 2007. The company has acquired a lease permit of 7 613 ha for fifty years (50) from the Government of Uganda for forestry development in Bukaleba Central Forest Reserve (CFR). BFC is responsible for the establishment and management of forest plantations for carbon offsets, quality forest products and environmental protection.

In the year 2007 the Tree Farm AS changed its name and became Green Resources AS Norway with 60 shareholders. Busoga Forestry Company is now wholly owned by Green Resources AS Norway. The Kachung Plantation Project in the Dokolo district is also being developed by Lango Forestry Company formerly Norwegian Afforestation Group (U) Limited, a subsidiary company of Norwegian Afforestation Group in Norway. Green Resources is also the largest shareholder of Lango Forestry Company and is far advanced to merge both companies into one, which will be known as Busoga Forestry Company.

2.4 Organisational Structure

The basic organisational structure of the company is as follows:



2.5 Ownership and Use Rights

Busoga Forest Company is fully owned by Green Resources AS Norway. The company acquired a lease permit of fifty years (50) from the Government of Uganda for forestry development in Bukaleba and Kachung Central Forest Reserves (CFR). BFC is responsible for the establishment and management of forest plantations for carbon offsets, quality forest products and environmental protection.

2.6 Other Land Uses

The surrounding land use is mainly subsistence agriculture, sugar cane and community villages.

2.7 Non-certified Forests

Green Resources has other forest projects areas that are not within the current scope of the forest management assessment within Uganda and is continuously looking for more opportunities. These forest projects areas will in future be included in the scope for forest management. These project areas are managed under the same management system as Busoga Forestry Company. Green Resources also have other forestry projects in Tanzania, Mozambique and South Sudan. The project in Tanzania is already FSC certified.

The Green Resources annual report for 2009 makes clear reference to all their forest project areas and provides a clear commitment to obtain FSC certification for all its forests.

3. FOREST MANAGEMENT SYSTEM

3.1 Bio-physical setting Geography:

Bukaleba Central Forest Reserve is located 40 km east of Jinja on the lower elevation of Lake Victoria in Mayuge District. The altitude varies from 1 130 m (minimum) to a maximum of 1 370 m above sea level. There is an all weather access road, which links the project with Jinja town. Kachung Forest Reserve is located in Dokolo district, Northern Uganda, and is situated about 30 km south of the town of Lira.

Ecology:

The average temperature is 30 °C with an average minimum of 25,5°C and absolute maximum of 32°C. Wind runs during the rainy season stands at 1-4m/sec, compared to the dry season run of 4-8m/sec.

The average annual rainfall lies between 1 000-1 250 mm in the two rain season patterns of March - May and September - November; with the heavy rains coming in March-May season. There are two marked dry seasons July-September, and December-February being the driest. Evaporation is moderate which means that soils retain moisture for periods of the year during rainy seasons

The original vegetation of Bukaleba Forestry is characterised by scattered patches of *Phragmites mauritania* and *Cyprus latifolios* along the lake shore and *Milicia excelsa*, *Ficus sur*, *Antiaris toxicaria*, *Markhamia lutea*, *Ficus natalensis*, *Albizia coriaria*, and *Maesopsis eminii* found in forest wood land. Other species found in Bukaleba forest reserve include herbaceous species like *Cyperus rotundus*, *Scleria melanomphala*, *Desmodium salicifolium*, *Digitaria abyssinica*, *Imperata cylindrica*, *Leersia hexandra* etc. Within the plantation there are patches of natural vegetation which can be observed along river valley bottoms, water ways and steep slopes. These have been left intact to improve biodiversity and to protect the areas from erosion by rainwater, and also to protect the rivers and streams. The Manyiro Peninsula area is still intact and contains the high conservation value forest. The rest of the Bukaleba Forest Reserve did not receive the protection that was intended and is now largely disturbed by subsistence farming. It is this disturbed land that is replanted with plantations, while the areas that has still forest left receive enrichment planting treatment where indigenous trees are used to replant.

The vegetation of Kachung central forest reserve consists of dry *Combretum* savannah and wooded

grassland with mainly low trees up to 10-15 m of height, with *Borassus ethiopum* as a dominant species. This vegetation has been heavily depleted due to charcoal burning. The remaining part of the area is grassland and grasses of medium height. Grasses such as *Imperata cylindricum*, *Panicum maximum*, *Hypererhenia filipendula*, *Setaria cephecelata*, *Setaria megaphylla*, *Pensetum spp*, *Sporobolus africana*, *Eragrostis exasperate*, *Pasperlum*, *Vigna lantiola*, *Cypress rotenus* and *Bulbosa spp*.

Soils:

The Bukaleba plantation area is made up of pre-cambrian rocks with bare granitic rocks at several places. The ridge is heavily eroded with several bare surfaces. The lower slopes and flat areas have alluvial soils ending up into sandy clay soils. The elephant grass (*Pennisetum purperium*) on northern slopes are indicating fairly deep fertile soils while *Cympopogon afronardus* and *Imperata cylindrica* indicate infertile soils towards the lake and *Themeda triandra* is underlain by rocky base

on very thin soil. The reserve is characterized by a central ridge running almost parallel to the lakeshore in south-east to north-west direction. Although the ridge has more rounded tops, the highest peak is 1 384 m above sea level. The ridge is generally rugged and rocky and slopes on either side to form flat lands into Lake Victoria to the south and cultivated lands to the north. The ridge area has shallow soils and is not suitable for commercial forestry.

Soils at Kachung plantation are dominated by the Buruli series which cover 54% of the total reserve area. They are made up of dark-red to yellowish red lateric sandy clay loam to clay soils developed on strongly fore-weathered basement complex rock material consisting largely of gneisses and granites. Depth is variable over pisolitic laterite, but is always shallowest at the plateau edges where sheet laterite often over crops. On a number of sites Buruli soil types merge with the Amuria types. Buruli are on the whole well drained and are not subject to inundations. Their weakly aggregated organic horizon makes them susceptible to erosion. At Kachung and surrounding areas, erosion is minimised by permeability of these soils and the flat terrain on which the reserve occurs.

The Amuria soils occupy 30% of the Kachung area. They are deep, brown to dark brown, stone free with textures ranging from sandy clay to loam to clay.

3.2 History of use

The past management of the Bukaleba Forest Central Reserve was based on providing Mvule logs for sawmill in Kityerera. The rest of the species which include *Albizia*, *Maesopsis*, *Alstonia*, *Terminlia* and a range of other species were not harvested. In 1974, over 5 000 ha of the reserve were given to the veterinary Department to raise beef cattle and almost all of this area falls within the eastern part of the reserve. This was known as Bukaleba Beef Scheme. Under this scheme the area was fenced and large trees removed by bulldozers. Some beef cattle were introduced and the area had infrastructure such as piped water supply from Lake Victoria, and five modern houses some of which are still standing on the western side but in a sorry state.

The reserve which was under the beef scheme was cleared of most natural trees leaving only *Imperata cylindrica* (elephant grass) and some *Combretum mole* on ridge tops.

In the area of the reserve which had remained under the management of Forest Department now NFA, attempts were made to plant pine in 1976 - 1977 some 30 ha were planted and again in 1990 - 1993 an additional 80 ha of pine mostly *Pinus caribaea* were planted. However, no tending operations were carried out in both the old crop and the young crop until of late when a private contractor was hired by the NFA to carry out thinning in this part of the plantation. As a result of this, stocking is low and the trees have very poor form.

In the rest of the area, there has been intensive encroachment of the reserve and most important natural trees in the reserve destroyed by illegal charcoal burning.

Kachung Central Forest Reserve was gazetted in 1952 by the colonial Government and was first surveyed in 1961. The overall objective was to have an equitable distribution of forest resources countrywide to provide wood-based products for the local people. The other major objective was to develop a forest estate to provide wood to the local pulp and paper mill which had been planned to be developed in the area. All claimants of pieces of land that had been included as part of the reserve were compensated by the then Government of Uganda and were resettled elsewhere. Due to inactivity on the reserve a number of encroachers started using the land for subsistence agriculture and cattle grazing. None of the encroachers settled permanently on the reserve. Preceding Governments however made efforts to reclaim almost all the forest reserve land that was surrendered by the colonial Government at the time of independence. This has been done to revamp the forest sector which was dwindling at a very high rate. The Forest Department was responsible for this task of reclaiming all forest reserve land.

3.3 Planning process

In each financial year, the Board of directors stipulates targets to be pursued to meet company objectives. BFC directs or explains these targets to its departments or projects. The different departments/projects then prepare budgets (APO) which show a comprehensive list of all jobs to be accomplished and their estimated costs with provision for actual expenditure when carried out. For BFC, the APO reflects the overall projects or departmental annual targets to be achieved as specified from the relevant Forest Management Plan. The APO is discussed at project level and

later submitted to BFC management. During the BFC Management budget session all departmental executives and project managers present their budgets. The budgets are discussed and later an integrated (overall) budget is prepared for submission to Management board for approval. Upon approval of the budget, BFC then request fund for implementation for the approved activities. Any deviations felt necessary from the budget in the course of the implementation of activities, BFC management has to seek approval from Board of directors. When funds have been remitted, the expenditure is strictly done according to the existing accounting system and financial regulations of the company.

For the purpose of monitoring progress in the implementation of the FMP, a monitoring mechanism is adopted by BFC during the planning period to evaluate progress made and to make corrective measures where appropriate in case of deviations from the set targets. The Forest Plantations are managed by the Plantation Manager who is answerable to the Managing Director of GRL .The project is divided into two ranges (management units) to ease management of the operations. The workers are made aware of the objectives of the management towards which they will be required to direct their efforts. At project level, weekly meetings are conducted to discuss performance so that deviations that may arise during implementation of the plan may be corrected. To ensure effective coordinating mechanisms the Plantation Manager adopts direct supervision, mutual adjustments and regular field check up. A progress report is prepared for discussion at BFC management meeting, which is held every month.

The management staffs from the Head Office makes regular visits to the project area to make follow up of the operations and make corrective measures where appropriate.

Evaluation of performance is undertaken to be able to compare the actual and planned performance and make necessary corrections. The performance is measured by use of already set standards, reports, work-studies, time studies, physical measurements, accounting data among others. The Plantation manager also ensures that Compartment and Plantation registers are filled, in addition to job cards weekly, bi-weekly, monthly and annual reports, are also be used as mechanisms for performance evaluation.

The Managing Director, Plantation Manager and Foresters and other supervisors are responsible for the implementation of the plan through their respective levels of responsibilities in coordination and control of project activities. Employment of qualified and experienced personnel together with undertaking regular training by BFC are expected to enhance efficiency and improved coordination and control of activities.

3.4 Harvest and regeneration

Land clearing is carried out according to the planting plan, clearing just enough land required for the plant season. Initial clearing is concentrated in the dry season when labour is available as people do little work in their own gardens during the dry season. The number of seedlings to be planted on each ha depends on soil fertility. However, it is calculated that the optimum average spacing for pines block planting is (3x3) m giving a stocking of 1 111 trees/Ha. *Eucalyptus* clone will be planted and at a spacing of (2,5 x2,5) m giving a stock of 1 600 trees/ha. Also *Maesopsis* will be planted at a spacing of (5x5) m giving a stocking of 400 tree/ha. This spacing provides easier management in terms of thinning operations, and allows the selection of high producing trees.

Procurement of seeds and *Eucalyptus* cloning materials and *Maesopsis* is made in close co-operation with NFA and National Tree Seed Centre, although recently the company started obtaining seed from the Tanzania Tree Seed Agency.

Nursery practices and other silvicultural operations are similar to the current techniques and practices explained in Green Resources Work Procedures and Instructions document. During tree establishment, hand pitting will be done when the ground is moist in aligned marked areas for pitting. The specification for pits is 30 cm diameter and 30 cm depth. Scattered trees species are been left intact during land preparations. Planting is done early during the rainy season (when moisture has penetrated to a depth of 25-30 cm) to ensure good survival and early growth of the nursery stock. This will also permit early blanking and weeding during the remainder of the rainy season. In some areas, apart from spot weeding, slashing can also be carried out if considered necessary. The existing guidelines for pruning and thinning will be followed for Pines.

Survival assessment of the planted area is normally carried out about two weeks after planting so that blanking can be carried out the same planting season where necessary. A further survival assessment is carried out 6-9 month following this, with the replanting taking place if stands have a survival rate below 70%. The PSP has been established and maintained mainly to monitor volume increment and the quality of the crop in relation to the objectives of management in the plantation. Diameter at breast height (dbh), tree height, shall be measured and monitored.

BFC will use the harvesting guideline developed by GRAS for the harvesting operation. Prior to harvesting a site specific assessment EIAs shall be done to identify any negative significant impacts involved in the operations from marking, felling, skidding so as to enable the mitigation of the negative impacts. During harvesting the procedures to be followed are described in the group harvesting procedures and guidelines.

3.5 Monitoring processes

For the purpose of monitoring progress in the implementation of the FMP, a monitoring mechanism will be adopted by BFC during the planning period to evaluate progress made and to make corrective measures where appropriate in case of deviations from the set targets.

Monitoring Plan

Monitoring of Environmental and commercial Aspect					
Parameter to be monitored	Sampling frequency	Indicator	Standards WHO/UG STD	Baseline data	Responsibility
Soil quality	Once in 5 years.	PH, electrical, conductivity, nitrates, sulphates, phosphates , borates hydrocarbon Permeability Physical appearance.	WHO STD Or UG Standards	Ambient levels established during pre-construction phase	BFC
Water quality	Twice a year in dry and rainy season.	PH, Conductivity, Oil content, TSS, SO4, Cr, Pb, BOD5,,COD TKN,Plankton		Ambient levels established during pre-establishment phase.	BFC
Collection of meteorological data	Daily	Within the plantation-weather changes.	Established standards	Baseline existing information	BFC
Status of both natural and planted vegetation/trees in the project area	Once a year	Vegetation cover trees/ species composition		Existing baseline information	BFC
Monitoring Of Social Economic and Cultural Aspects					
Workers safety, health and occupation rights	Once a year	Salary levels safety measurements and disease control		Existing work regulations and Labour laws	
Economic impact	Once in 3 years	Economic activity profile to villagers around the company economic gains by		Economic performance prior establishment of the	

		District through service charges		project	
Effect on culture	Once in 5 year	Changes in behaviour		Current state	consultancy
Health occupation	Twice a year	Prominent diseases trend in STI and HIV/AIDS.		Health data prior to the established of the project	BFC
Public relation	Once a year	Number conflicts, court cases, grievances			BFC

Vegetation on the ridge and slopes, woodland and wetland has been left intact and are monitored for catchment and biodiversity purposes. During the plan period a botanical survey was done covering tree species composition, their uses, and identification of rare and endangered/threatened and endemic species and determined that only one species is in the category of endangered species. This species will be conserved and regenerated.

4. SOCIO-ECONOMIC AND ENVIRONMENTAL CONTEXT

4.1 Social aspects

	Male	Female
Number of own workers	124	44
Number of contract workers	465 ¹	119 ¹
Minimum daily wage for agricultural/forestry workers	UGsh 2 500 (\$1.25)	
Infant mortality rates (under 5 years)	137/1 000 live births	
Proportion of workers employed from the local population (%)	100%	

¹ Number of contract workers changes with seasons as more women are employed when planting.

The local communities in the neighbourhood are of mixed tribes but they are dominated by the Basoga tribe. The main economic activity in the area is fishing, subsistence agriculture, trade in agriculture produce and limited livestock grazing. The most common food crops grown are maize, beans, potatoes, millet, rice, cassava, tomatoes etc. The overall social situation in the area around the forest organization under evaluation is poor. This is evidenced by the rapid rate of population growth and the pressure on natural resources, the decay in educational and health infrastructure, growing malnutrition and poverty, and widespread unemployment and underemployment.

Women, children and youth bear a disproportionate burden of the social crisis in Uganda who constitutes 70 to 80 per cent of the total population and a preponderant share of the unemployed and participants in the informal economy. Ugandan women experience the highest maternal mortality rates in East Africa, while the level of illiteracy among them is almost unsurpassed anywhere else. The infant mortality rate (under 5 years) is at 137 deaths /1,000 which is very high. The most serious social problem in the area is the rapid spread of the HIV/AIDS disease which has brought untold havoc to the region's health landscape in recent years.

The adjacent local communities form the major workforce. These communities provide casual labour for the plantations, while getting wages and other social benefits being provided by BFC.

Extension and seminars are used as tools to educate people on different issues pertaining to plantation activities such as fire protection, zero grazing and environmental conservation.

Education and extension is reinforced to ensure the communities around and plantations workers are aware of their limitations and rights with regard to the plantations and to minimize the interference in the plantation with man and domestic animals.

Community Forestry:

Promotion of private /village afforestation programs by providing them with seedlings and training to enable them improve their incomes through sale of poles and timber to the company and other wood products for their own use. They can also benefit from Carbon Fund through carbon emissions reduction. Beekeeping is also promoted with the purpose of expanding business opportunities to the local community and the company.

Jobs are created to enable local economic empowerment and hence opening up new business opportunities and improved standard of living. In this context, equal employment opportunities of both women and men are promoted and encouraged. BFC is currently one of the main employing organizations in the area. The company provides the workforce with salaries and wages while enjoying other social benefits.

4.2 Environmental aspects

Major environmental problems in the region include overgrazing, deforestation, and primitive agricultural methods, all of which lead to soil erosion. Forests and woodlands were eliminated and between 1983 and 1993, an additional 7.7% of forest and woodland were lost. Wetlands have been drained for agricultural use.

Vegetation on wetland and ridges has been left intact and are monitored for catchment and biodiversity purposes. During the plan period a botanical survey was done covering tree species composition, their uses, and identification of rare and endangered/threatened and endemic species. The survey has also recommended species of particular importance that could be regenerated by BFC projects or within the surrounding villages. . This vegetation will be left intact to offer refuge to wildlife, improve biodiversity, protect the areas from erosion by rainwater and also protect the Lakeshore and streams.

The project demonstrates its conservation of biodiversity role by leaving all natural trees and shrub vegetation intact and planting only in the deforested areas. In compliance with the above, the project will execute the following:

- Manyiro peninsular, ridgeline, remnant woodland and bush vegetation are not been disturbed and thus enhance their capacity as catchment areas, carbon sequestration and protection of biodiversity thus safeguarding some of the native grasses and trees that may contain rare and endemic species.
- A buffer zone of not less than 200 m from the lake shore has been be demarcated and mapped and left intact or protected from any activity.
- Protection of High Conservation Value Forests (HCVF's), Sites of special importance (SSI's), environmental safeguards based on environmental assessments is being undertaken.
- Protection of special interest sites such as graves, ritual sites etc for the local people will be done and demarcated /mapped and planting shall be done 10 m away from these sites.
- Protection of available wildlife and management according to the wildlife policy of the country.
- A conservation area has been left intact or set aside without planting as a control for monitoring and comparing vegetation changes between the two habitats.

The ecological survey has identified only one endangered species, namely *Ecephalartos equatoriasis*. This species shall be conserved and protected and their regeneration encouraged by BFC in collaboration with surrounding villagers. During the ecological survey a study identified Manyiro peninsular which have high conservation value forests containing a variety of species including animals. This forest area shall not be disturbed and the watershed species shall be conserved and regenerated for catchment purposes.

Burning of vegetation before planting (leakage) and collection of firewood shall be prohibited for biodiversity conservation and plant species that have use-value like honey, beeswax, fruits and medicines among others to the local communities are numerous and shall be targets for conservation. Beekeeping program has currently started by a consultancy assessment for trees flowering intensity and recommended the planting of Eucalyptus species, which has conducive

flowering characteristics. The program shall be implemented through involvement of the local community in order to promote beekeeping products for mutual interest and adding value to the forest plantations

The environmental impact assessment of the project has been carried out and an Environmental Monitoring plan is implemented. The plan is for monitoring changes in the vegetation, meteorology, diseases, soil quality, water quality, biodiversity and social- economic aspects etc in the course of the implementation of the project with the purpose of mitigating any negative impacts that may arise. Thus this Environmental Monitoring Plan is implemented as part of BFC by adhering to the impacts mitigation measures contained in the EIA report to ensure that all issues of environmental concerns are addressed appropriately. BFC has prepared guidelines consisting of the strategies and methodology for implementation of the Environmental Monitoring Plan by the project management.

4.3 Administration, Legislation and Guidelines

Uganda has a fairly advanced policy and institutional framework that, if fully implemented, would lead to sustainable and equitable forest management. Over the past ± ten years, there has been considerable development of key instruments and tools for forest governance, including revised forest and land policy and legislation, participatory land use planning initiatives and various decentralization reforms. Currently, the state responsibility for forest management is vested in the the National Forest Authority (NFA).

The following table lists the key national legislation, regulations, guidelines and codes of best practice that are relevant to forestry in the commercial, environmental and social sectors. This list does not purport to be comprehensive, but indicates information that is key to the forestry sector.

Legislation and regulation	Notes
The Uganda Gazette	
The National Environment (management of Ozone Depleting Substances and Products) regulations, 2001	
The National Environment (Minimum standards for management of soil Quality) regulations, 2001	
The National Environment (waste management) regulations	
The National Environment Management Policy for Uganda, 1994	
Land Act	
The Water Act, 1995	
National Forestry Plan 2001, 2002	
Private Forest Sector in Uganda – Opportunities for greater involvement	
National Forestry & Tree Planting Act, 2003	
National Environment (Riverbanks, Lakeshores & Wetlands) Regulation, 2000	
The National Environment (waste management) regulations	
Localizing Global Environmental Conventions, NEMA, volume 1 (RAMSA, CBD, UNFCCC)	
The Uganda Wildlife Statute, 1996	
Value Added Tax Statute 1996 and Amendments (2002-2008)	

Workers' Compensation Act, 2000	
The Employment Act, 2006	
Trade Union Act, 2000	
Labour Unions Act, 2006	
The National Social Security Fund Act	
The Labour Disputes (Arbitration & Settlement) Act, 2006	
The Occupational Safety & Health Act, 2006	
The Constitution of The Republic of Uganda, 2006	
Guidelines and Codes of Best Practice	Notes
Kyoto Protocol	
Convention on Biological Diversity	
Convention on the International Trade in Endangered Species (CITES)	
International Labour Organisation (ILO)	

5. CHANGES IN MANAGEMENT, HARVESTING, SILVICULTURE AND MONITORING

The following table shows significant changes that took place in the management, monitoring, harvesting and regeneration practices of the certificate holder over the certificate period.

Description of Change	Notes
SURVEILLANCE 1	
<u>EXTENSION OF SCOPE</u>	
<p>The Norwegian Afforestation Group had a concession to the Kachung plantation near the town of Lira in northern Uganda. Their name was changed to Lango Forestry Company. NFA issued tree-farming licence no 815 dated 13/01/2010 to the Norwegian Afforestation Group (u) Ltd for the establishment and development of a commercial forest plantation of 2 669 ha in the Kachung Central Forest reserve. The licence is valid for 50 years and expires on 12/06/2046. All the shares in the Norwegian Afforestation Group were purchased by Green Resources and Busoga Forestry Company in 2006 – share takeover certificates are available. It is clear that Green Resources has legal title to manage the Kachung plantation.</p> <p>Management decided to include the Kachung plantation within Busoga Forestry Company and wishes to extend the scope of the current certificate to include both Bukaleba and Kachung plantations within the one certificate.</p> <p>A comprehensive management plan for Kachung plantation is available for the period 2010 to 2015 which is based on the same format as that for Bukaleba plantation. The plan has been implemented with good plantation maps available, PSPs established and the forest estate subdivided into blocks and compartments with each compartment clearly marked with a permanent sign containing information such as compt number, block number, sp used, date of planting and origin of seed. A formal organisational structure has been developed and staffed with trained foresters and supervisors. Adequate human resources are available to execute the plan with 12 professionals (e.g. foresters and accountants) and 67 semi-skilled staff. A formal EIA was conducted by a consultant and a NEMA approval certificate no 1746 dated 22/07/2008 was consequently issued. This was issued on condition that mature indigenous trees must be left unfelled inside plantation areas and the identified 500 ha of HCVF must be maintained in its natural state. Evidence of compliance with both conditions was witnessed in-field.</p> <p>All claimants of pieces of land that had been included as part of the original forest reserve when it was gazetted in 1952 were compensated by the then Government of Uganda and were resettled elsewhere. It is the company's stated objective to have good relationship with local communities, and to ensure that villagers benefit positively from the company's activities. A comprehensive stakeholder consultation process with especially local people is in place and is properly documented.</p>	

Description of Change	Notes
<p>A further environmental and socio-economic impact statement report dated March 2008 was also available. The company met with local stakeholders on several occasions about environmental conservation awareness, FSC, CDM; and also with cattle grazers regarding unauthorised grazing. A large annual meeting is held with local stakeholders at the end of each year. Files are available of minutes of stakeholder meetings such as that of 15/07/2010 with cattle grazers. The Proforest HC VF toolkit was used by management to evaluate the FMU for the presence of HCVs; and a report is available which identified the presence of HCV 1 on the FMU. Since the report was not shared with experts and other relevant bodies to obtain their inputs, CAR 20 was raised. A report dated 31/07/2008 on the results of an ecological survey of Kachung plantation is also available. A biodiversity monitoring plan is available which describes the identification of monitoring indicators, frequency and monitoring procedures and monitoring sites. This is done for plants, birds, mammals and fish. This is a new plantation and actual biodiversity monitoring has not yet started although PSPs are in place in the plantations and weather data is recorded via an automatic weather station.</p> <p>The extension of the existing scope to include the Kachung plantation is recommended.</p>	
SURVEILLANCE 2	
SURVEILLANCE 3	
SURVEILLANCE 4	

6. PREPARATION FOR THE EVALUATION

6.1 Schedule

The Evaluation was preceded by a pre-evaluation by SGS QUALIFOR during 2–3/2/2009. This examined the management systems and identified any gaps that might preclude certification. Information gathered was used to plan the main evaluation. Key stakeholders were identified.

6.2 Team

The table below shows the team that conducted the main evaluation and the independent specialist(s) that were selected to review the main evaluation report before certification is considered.

Evaluation Team	Notes
Team Leader	Has a Diploma in forestry, Higher diploma in Forestry Conservation and a Masters degree in Environmental Management. He has 20 years experience in forestry and conservation and 6 years experience in Environmental Management internationally. More than 100 days of FSC auditing.
Local Specialist	Has a PhD in Forestry, 11 years experience in forestry and teaching, involved in teaching and research since 2000, speaks English, Swahili and Ugandan local languages (Rukiga, Runyankore, Runyoro, Rutoro and Luganda), and has 2 years experience as local specialist on FSC assessments in Uganda.
Peer Reviewers	Notes
Peer Reviewer 1	Has a PhD in Environmental Economics, 15 years experience in forestry or related field of Environmental Economics in the internationally and regionally forestry industry and

	currently works in academia and research organisation.
Peer Reviewer 2	Has a PhD in Applied Ecology, 10 years experience in forestry or related field in forest ecology and restoration, nationally and in the region and currently works in academia organisation.

6.3 Checklist Preparation

A checklist was prepared that consisted of the documents listed below. This checklist was prepared by adapting the QUALIFOR generic forest management checklist.

This adaptation included canvassing comments from stakeholders 4 weeks before the field evaluation and a copy of this checklist is available on the SGS Qualifor website, www.sgs.com/forestry.

Standard Used in Evaluation	Effective Date	Version Nr	Changes to Standard
SGS Qualifor: Generic Forest Management Standard (AD33) adapted for Uganda.	11 April 2007	AD 33-UG-02	
SGS Qualifor: Generic Forest Management Standard (AD33) adapted for Uganda.	29 March 2010	AD 33-UG-03	Indicator 5.5.3 has been added, and the verifiers and guidance under 6.6.2 have changed. Appendix A and B have been included to provide information to the auditor. All of the changes in the standard have been included in the 2011 checklist and report template.

6.4 Stakeholder notification

A wide range of stakeholders were contacted 4 weeks before the planned evaluation to inform them of the evaluation and ask for their views on relevant forest management issues. These included environmental interest groups, local government agencies and forestry authorities, forest user groups, and workers' unions. Advertisements were placed in local news papers and notice boards were displayed at the entrance to the FMU. Responses received and comments from interviews are recorded at the end of this Public Summary.

7. THE EVALUATION

The Main Evaluation was conducted in the steps outlined below.

7.1 Opening meeting

An opening meeting was held at Busoga Forestry Company Head office in Jinja. The scope of the evaluation was explained and schedules were determined. Record was kept of all persons that attended this meeting.

7.2 Document review

A review of the main forest management documentation was conducted to evaluate the adequacy of coverage of the QUALIFOR Programme requirements. This involved examination of policies, management plans, systems, procedures, instructions and controls.

7.3 Sampling and Evaluation Approach

A detailed record of the following is available in section B of the evaluation report. This section does not form part of the public summary, but includes information on:

- Sampling methodology and rationale;
- FMUs included in the sample;

- Sites visited during the field evaluation; and
- Man-day allocation.

The majority of management was present and available throughout the audit. The document review was mainly conducted at the Jinja office. Both the auditor and local specialist visited in-field operations, the field office and workshop and store area. Prominent areas were visited such as the fire tower, the peninsula with HCVF, sites of special interest, nursery and some of the illegal villages. Extensive consultation was done with villagers. The company sponsored and helped the neighbouring community with the building of a clinic and still play an active role in providing resources for the clinic. Boreholes were drilled and water is provided to the community. Time was allocated so that a whole day was spent on the FMU visiting these places. The sawmill construction site is off the FMU in the industrial area of Jinja and was also visited. In total six man-days were spend at the company on and off the FMU.

7.4 Field assessments

Field assessments aimed to determine how closely activities in the field complied with documented management systems and QUALIFOR Programme requirements. Interviews with staff, operators and contractors were conducted to determine their familiarity with and their application of policies, procedures and practices that are relevant to their activities. A carefully selected sample of sites was visited to evaluate whether practices met the required performance levels.

7.5 Stakeholder interviews

Meetings or telephone interviews were held with stakeholders as determined by the responses to notification letters and SGS discretion as to key stakeholders that should be interviewed. These aimed to:

- clarify any issues raised and the company's responses to them;
- obtain additional information where necessary; and
- obtain the views of key stakeholders that did not respond to the written invitation sent out before the evaluation.

Nr of Stakeholders contacted	Nr of Interviews with		
	NGOs	Government	Other
MAIN EVALUATION			
20 The audit was published in local newspapers and notifications were fixed to entrances.	3	3	21
SURVEILLANCE 1			
28	0	4	43
SURVEILLANCE 2			
SURVEILLANCE 3			
SURVEILLANCE 4			

Responses received and comments from interviews are recorded under paragraph 13 of this Public Summary.

7.6 Summing up and closing meeting

At the conclusion of the field evaluation, findings were presented to company management at a closing meeting. Any areas of non-conformance with the QUALIFOR Programme were raised as one of two types of Corrective Action Request (CAR):

- Major CARs - which must be addressed and re-assessed before certification can proceed
- Minor CARs - which do not preclude certification, but must be addressed within an agreed time frame, and will be checked at the first surveillance visit

A record was kept of persons that attended this meeting.

8. EVALUATION RESULTS

Detailed evaluation findings are included in Section B of the evaluation report. This does not form part of the public summary. For each QUALIFOR requirement, these show the related findings, and any observations or corrective actions raised. The main issues are discussed below.

8.1 Findings related to the general QUALIFOR Programme

PRINCIPLE 1: COMPLIANCE WITH LAW AND FSC PRINCIPLES	
<i>Criterion 1.1 Respect for national and local laws and administrative requirements</i>	
Strengths	
Weaknesses	
Compliance	The management staff of Busoga forestry Company showed a good understanding of the relevant Ugandan laws regulating the forestry industry. Access to legislation was demonstrated during interviews. There are people employed to ensure legislation and policies are updated. Over and above country legislation the company has also set its own policies to ensure good forest practice.
<i>Criterion 1.2 Payment of legally prescribed fees, royalties, taxes and other charges</i>	
Strengths	
Weaknesses	Although the company has made efforts to meet all the required taxes, there is lack of evidence of payments for the Local Government Service Tax to Jinja and Mayuge District Local Governments, which is a requirement under law for people who earn a monthly salary of UGX 100,000 and above. Major CAR 07 was raised.
Compliance	Payment of legally prescribed fees, royalties, taxes and other charges are budgeted for each year and it appear as cost codes with money allocated on the budgets. The minor CAR was raised for the one particular piece of evidence not found during the audit. Documented evidence of the other payments was available.
<i>Criterion 1.3 Respect for provisions of international agreements</i>	
Strengths	
Weaknesses	
Compliance	Uganda is a party to, or signatory of many of the international agreements such as CITES, genda 21, RAMSAR, ILO, Biodiversity Convention etc. These have been included in the legislation that the company adheres to. It is further enhanced by the company's environmental policies and Employee Handbook. Although the company is not an authority in itself to enforce any of these, they cooperate with government in the enforcement by firstly setting and adhering of policies and guidelines, and secondly by reporting and acting against illegal activities in this regard.

<i>Criterion 1.4 Conflicts between laws and regulations, and the FSC P&C</i>	
Strengths	
Weaknesses	
Compliance	No conflict between legislation and the FSC principles and criteria were noted.
<i>Criterion 1.5 Protection of forests from illegal activities</i>	
Strengths	
Weaknesses	Much as the management of Bukaleba Forest Plantation has instituted measures to halt illegal activities on its FMU, illegal grazing, cultivation of agricultural crops and settlement still persists and were evident during the field assessment. Minor CAR 08 was raised.
Compliance	The land concern is leased from government as a National Forest Reserve, with the aim of planting and managing plantations and indigenous forests. Over the past decades the land has been illegally occupied by settlers who practice subsistence farming and degraded the land. Although it is a government function to restore and reinstate the intended land use, it is done through cooperation with Busoga Forestry that provides technical ability.
<i>Criterion 1.6 Demonstration of a long-term commitment to the FSC P&C</i>	
Strengths	
Weaknesses	
Compliance	It is captured in policies of the holding company, Greenresources that all operations in Uganda will adhere to legislation and the principles and criteria of FSC. It is further backed up by the fact that the activities of Greenresources' activities in neighbouring countries and in the rest of Uganda is also in various stages of achieving certification, with those in Tanzania already certified.
PRINCIPLE 2: TENURE AND USE RIGHTS AND RESPONSIBILITIES	
<i>Criterion 2.1 Demonstration of land tenure and forest use rights</i>	
Strengths	
Weaknesses	
Compliance	The company has a tree farming licence offered by National Forest Authority No.670 dated 14 th April 2008, in the Kyoga Management Area, Sector Bunya, subject to the provisions of the National Forestry and Tree Planting Act No. 8/2003 issued to Busoga Forestry Company Ltd of P.O.Box 1900 Jinja. The purpose of the licence is establish and develop a commercial forest on a area of 6461 ha in Bukaleba CFR valid for 50 years and manage the remainder 2704 ha for conservation purposes.
<i>Criterion 2.2 Local communities' legal or customary tenure or use rights</i>	
Strengths	
Weaknesses	
Compliance	The customary tenure or use rights for local communities identified were privileges which people traditional had enjoyed like collection of deadwood for firewood, thatch grass, water and other non-timber forest products only for domestic use. The rights are clearly stipulated in section 33 of the National Forestry and Tree planting Act of August 2003, which states that a member of a local community may in a forest reserve or community forest cut and take free of any charge for personal domestic use in reasonable quantities. These are recognised by the BFC and have been incorporated in their Management Plan.
<i>Criterion 2.3 Disputes over tenure claims and use rights</i>	
Strengths	
Weaknesses	Although the company has followed law, the Arise situation represents a significant dispute that requires either a speedy resolution or a redefining of the boundaries of the FMU to

	<p>exclude the area of conflict from the scope of the certificate.</p> <p>Currently, the system in place to either relocate the people in illegal settlements to alternative sites off the FMU or to redefine the boundaries of the FMU so as to exclude these areas so that the ecological functions of the forests is not jeopardised is not resolved.</p> <p>For example around the peninsular, people are cultivating crops beyond the buffer zone without leaving the stipulated 200 m. Major CAR M10 was raised.</p>
Compliance	There is evidence of meetings between Community Development Officers and BFC staff and management to resolve conflicts and disputes. A record of steps followed in resolving disputes has been kept by BFC, Complaints and conflict resolution is captured in procedures and the correct processes are being followed.
PRINCIPLE 3: INDIGENOUS PEOPLES' RIGHTS	
<i>Criterion 3.1 Indigenous peoples' control of forest management</i>	
Strengths	
Weaknesses	
Compliance	None of the indigenous people had any legal or customary right before the lease agreement was established, and occupants found on the land all knew that they were there illegal.
<i>Criterion 3.2 Maintenance of indigenous peoples' resources or tenure rights</i>	
Strengths	
Weaknesses	
Compliance	A social impact study was done in 2007. Social and cultural impacts of the project are identified and are recorded in the monitoring plan section of the management plan. The land is state land and there are no recognised legal claims against the land.
<i>Criterion 3.3 Protection of sites of special cultural, ecological, economic or religious significance to indigenous peoples</i>	
Strengths	
Weaknesses	
Compliance	Sites of special interest are identified marked and management prescriptions available. Procedures also guide any future site that might be identified.
<i>Criterion 3.4 Compensation of indigenous peoples for the application of their traditional knowledge</i>	
Strengths	
Weaknesses	
Compliance	No evidence was found of any traditional knowledge that has been commercially exploited by the company and therefore compensation does not apply.
PRINCIPLE 4: COMMUNITY RELATIONS AND WORKERS RIGHTS	
<i>Criterion 4.1 Employment, training, and other services for local communities</i>	
Strengths	
Weaknesses	
Compliance	Interviews with local people, staff and workers around Bukaleba Forest Plantation revealed that local people are given priority in employment as Patrolmen, and casual workers at the nursery, boundary marking and at planting and harvesting sites, etc. Over 90% of the local labour force was from the villages adjacent to the plantation. Evidence of the training of local workers to meet the organisation's long-staffing requirements was available during the audit. Salaries and daily fees are above average for the surrounding area. BFC is also involved in

	providing other services to the local communities and evidence was found of the provision of medical supplies to the local clinic, installing boreholes and provision of drinking water and also the provision of school fees and teaching material.
Criterion 4.2 Compliance with health and safety regulations	
Strengths	
Weaknesses	Although the company workers had been provided with Appropriate PPE (Personal Protective Equipment), workers found in Compartment BO4, crosscutting and sorting poles had no First Aid Kit. They were only equipped with overalls, gumboots and gloves. None of them had also received training in the use of first aid. CAR 09 raised.
Compliance	The company has an Occupational Health and Safety policy in which the company presents its policy regarding health and safety of its staff and workers. This document addresses aspects such as occupation health and safety policy, working environment, medical examinations, health management and working conditions. It also states the commitment of the company in maintaining a safe and healthy work environment for all employees. Workers were provided with PPE and drinking water which are requirements under the ILO Code of Practice.
Criterion 4.3 Workers' rights to organise and negotiate with employers	
Strengths	
Weaknesses	
Compliance	The system of trade unions is not much emphasized in Uganda. However, Interviews with workers revealed that they have informal associations and they have Worker Consultative meetings that provide a forum through which workers interact with their employers.
Criterion 4.4 Social impact evaluations and consultation	
Strengths	
Weaknesses	The stakeholder list provided did not include the NGO Arise Africa, an important stakeholder with whom conflict exist over the lease agreement of a portion of the FMU. CAR 06 raised.
Compliance	A copy of the socio-economic Impact Assessment Statement Report is available. It covers the situation analysis, socio-economic profile of the project area (demography, activities, stakeholder to be affected estimated value community socio-economic activities, employment, legal, policy and institutional framework, potential socio-economic impacts of Busoga Forestry Company , that may result from the plantation development and a monitoring plan has been developed with indicators, mitigation measures, actions and the responsible persons. BFC has made efforts to link up with various stakeholders through exchange of information. BFC has also posted most of its information to viewers on its website: www.greenresources.no . The Community Development Officer also holds regular consultations with all stakeholders when planning community development activities, particularly schools, health units and local councils. Minutes of such meetings were available.
Criterion 4.5 Resolution of grievances and settlement of compensation claims	
Strengths	
Weaknesses	
Compliance	The company has in place a Complaint; Grievances; Disputes and Conflict Resolution Procedure with all the necessary steps followed in handling complaints. Interviews with staff revealed that most complaints are brought verbally during meetings while in other cases Local Council (LC) chairpersons of the affected persons writes to the BFC officials. The company has a suggestion box where complaints are channelled. The company also has a file with all correspondences on encroachment and other complaints from stakeholders and the steps taken by the company.
PRINCIPLE 5: BENEFITS FROM THE FOREST	
Criterion 5.1 Economic viability taking full environmental, social, and operational costs	

<i>into account</i>	
Strengths	
Weaknesses	
Compliance	Budgets are entirely supplied by the Norwegian mother company Green Resources. Green Resources has made a substantial investment in Busoga to get it established. The current approved budget has environmental and social aspects budgeted. .
<i>Criterion 5.2 Optimal use and local processing of forest products</i>	
Strengths	
Weaknesses	
Compliance	Currently there is very little processing and use of forest products as they are still in an establishing phase. The few ha that are under the accelerated harvesting program is utilised for poles. Processing is done by own plant and for local market. Bush meat is discouraged but allowed on authorisation by the wildlife authority. Bee keeping is promoted amongst local villagers.
<i>Criterion 5.3 Waste minimisation and avoidance of damage to forest resources</i>	
Strengths	
Weaknesses	
Compliance	Harvesting techniques are described and give guidance to the kind of equipment to be used and how to apply. Harvesting at this stage very low scale and all timber is removed to the sawmill site for stockpiling. The pole treatment plant was about to be commissioned at the time of the audit. No timber was left in field.
<i>Criterion 5.4 Forest management and the local economy</i>	
Strengths	
Weaknesses	
Compliance	The forests are managed commercially for the timber value they produce. The plantations are also established to sequesterate carbon and to protect the natural vegetation and biodiversity. Although these objectives might not have financial benefit, its value is acknowledged. Other forest products are for free and do not play a role in the economy although the resources are available.
<i>Criterion 5.5 Maintenance of the value of forest services and resources</i>	
Strengths	
Weaknesses	
Compliance	Forest managers are aware of the need to protect the reserve for the biodiversity and environmental protection. The land is leased from the government through the National Forestry Authority. Biodiversity values of the natural forest are recognised and there is an attempt to enhance biodiversity through enrichment planting. One of the key objectives of the company is to plant for carbon sequestration.
<i>Criterion 5.6 Harvest levels</i>	
Strengths	
Weaknesses	
Compliance	Plantations mainly in establishing stage. Forest growth is extrapolated and estimated from yield tables for Uganda. Some compartments were measured in permanent sample plots. New planted areas are accurately mapped on GIS systems and information fed into a Micro Forest computer program.
PRINCIPLE 6: ENVIRONMENTAL IMPACT	

<i>Criterion 6.1 Environmental impacts evaluation</i>	
Strengths	
Weaknesses	
Compliance	A formal environmental impact assessment was done in 2005 when operations started. The impact study covers both environmental and social issues. The study has identified and assessed potential impacts and concludes with mitigating measures and monitoring required. The company also has specific site environmental impact assessment Procedure for Sites of Special Significance (SSIs) and Flora and Fauna species (RTEs) habitats in the vicinity of the plantation. The procedure has been developed to generate data for use in identification and assessment of the main effects of the plantation activities on the environment and alternatives and mitigation measures.
<i>Criterion 6.2 Protection of rare, threatened and endangered species</i>	
Strengths	
Weaknesses	
Compliance	Areas that may contribute to high biodiversity or that might have RT & E species has been identified by the company and with the help of external experts an ecological study was done to determine the environmental safeguards to protect these areas and species. Management prescriptions are included. The areas where the RT& E species occur are either in the forest or on the rocky outcrops. Both habitats are protected habitats and not threatened by forestry operations. The company has further implement a patrol system whereby illegal activities are prevented and add to the protection of the conservation zones and rare species.
<i>Criterion 6.3 Maintenance of ecological functions and values</i>	
Strengths	
Weaknesses	<i>Lantana</i> is quite commonly found on the FMU, both in conservation areas and compartment areas. It is being sprayed in both but extent of its spread in conservation zones are not known and mapped and without weed control plan. CAR 03 raised.
Compliance	Regeneration, succession, and the abundance of species is the result of natural processes that is allowed to take place. Enrichment planting is done only on disturbed areas with some of the least occurring species. Silviculture is applied to the exotic plantations to promote the optimal yield and timber quality. Despite the CAR raised in this section, the company does weed control.
<i>Criterion 6.4 Protection of representative samples of existing ecosystems</i>	
Strengths	
Weaknesses	
Compliance	The whole of the Imanviro peninsula is set aside for the HCVF it contains. There is a strip of 200 m around the lake that is maintained in its natural state to protect the riparian zone. The rocky ridge down the middle of the estate has shallow soils that are not suitable for planting and also contain the rare <i>Encephalartos</i> species. The area is managed as conservation zone. These areas are all mapped out on GIS maps. Riparian zones along streams are maintained in their natural state. Landscape scale conservation consideration is evident as all these different areas form representative samples of the forest that are interlinked through corridors.
<i>Criterion 6.5 Protection against damage to soils, residual forest and water resources during operations</i>	
Strengths	
Weaknesses	
Compliance	Procedures are developed for the protection of soil during operations. Water resources are protected by protecting the adjacent riparian zones. Guidelines developed by the holding company Green resources are implemented. No evidence of field activities leading to

	environmental damage was seen inside the leased area. Buffer zones are maintained along streams and a 200m wide buffer zone is maintained all along the coastline of the lake. These areas was indicated on maps and adhered to in field
<i>Criterion 6.6 Chemical pest management</i>	
Strengths	
Weaknesses	Chemicals are discussed in the management plan but not sufficient to justify the use and put reduction of chemical use as an option. CAR 4 raised. PPE in the chemical store is inadequate, safety precautions are inadequate, no eye wash facilities available, no fire extinguisher, no MSDS sheets available and the chemical store responsible person was not properly trained in the operational procedure. CAR 01 raised.
Compliance	There is a procedure in place for the use of chemicals. A person is allocated to ensure all chemicals used are FSC approved. No banned chemicals were found in store. No derogations were applied for. There is a list available of all chemicals and records are kept of all the chemicals used.
<i>Criterion 6.7 Use and disposal of chemicals, containers, liquid and solid non-organic wastes</i>	
Strengths	
Weaknesses	There was evidence of non-organic waste littered around the compound. Dustbins were provided but not used. CAR 12 raised.
Compliance	Dustbins are provided and waste is collected and removed to the Jinja municipal landfill site. Chemical containers are stored in stockpile while suitable disposal methods are investigated.
<i>Criterion 6.8 Use of biological control agents and genetically modified organisms</i>	
Strengths	
Weaknesses	
Compliance	No biological control agents or genetically modified organisms are used.
<i>Criterion 6.9 The use of exotic species</i>	
Strengths	
Weaknesses	
Compliance	The exotic trees being used for plantations are known species for commercial forestry in Uganda. The initial EIA indicate that these species will be used in the afforestation program and is acceptable to the authorities. The species to be used were assessed in the EIA and a selection was made on those with the least adverse impacts. By accepting and approving the EIA the authorities acknowledge that the positive impacts outweighs the adverse impacts and therefore approved the use of exotic species.
<i>Criterion 6.10 Forest conversion to plantations or non-forest land uses</i>	
Strengths	
Weaknesses	
Compliance	No conversion of forest is taking place. The area has been set aside as a forest reserve dating back to colonial time. Since then a process of deforestation took place making way for scattered subsistence farms and leaving the land disturbed. The forest reserve now leased by Busoga forestry was evaluated and a planned afforestation program is followed to re-plant the area with trees. Those areas where disturbance went beyond the recognition of the original forest are replanted with exotic Pine and Eucalyptus plantations. The rest of the reserve where forests are still recognizable is included in the conservation management plan where it is either totally protected or where enrichment planting with indigenous trees is done to enhance the forest.
PRINCIPLE 7: MANAGEMENT PLAN	

<i>Criterion 7.1 Management plan requirements</i>	
Strengths	
Weaknesses	
Compliance	There is a documented plan in place that describes the management objectives and the forest resources. It also gives guidance to other relevant documents like maps APO and guidelines that the company adhere to. The management plan is approved and valid from 2007 until 2012. Environmental safeguards are described along with management prescriptions that were developed by external experts. There are GIS maps showing the forest resource base including protected areas, watercourses, roads and other features important for forest management. There are also maps indicating the operations, compartments and monitoring. The mapping is good and GIS facilities are available at the office where detailed maps for specific operations can be drawn.
<i>Criterion 7.2 Management plan revision</i>	
Strengths	
Weaknesses	
Compliance	The medium term plan is valid for 5 years and is still valid until 2012. The Technical Manager Certification has been assigned with the specific responsibilities to do the revision and keep it updated
<i>Criterion 7.3 Training and supervision of forest workers</i>	
Strengths	
Weaknesses	Several unsafe actions were observed at the harvesting site where poles were trimmed. Eucalyptus poles were stacked and two operators were crosscutting on top of the stack. Some of the poles were wedged and tensioned by fellow workers while operator makes the cut. Cuts were made unsafe and close to fellow workers feet and legs whilst standing on the unsecure stack as well. The chain guide bars are exceptionally long and create a safety hazard and wasting resources. These were all elementary issues that the site supervisor did not pick up. The lady dispensing chemicals not being trained in the procedure. Mechanic not trained in procedure for oil spills. The Logging supervisor was not aware of the emergency help to give his crew team/ the workers in case of injury at work. He was not aware of the compartment where the operation was taking place. CAR 02 was raised.
Compliance	There is a training schedule and guidelines are provided in the staff development and training manual. Courses and field days arranged by the National Forestry Authority and the Sawlog production Group Scheme are attended. Staff is exposed to different conditions by the exchange program where staff interchange between the different business of Green resources within Africa.
<i>Criterion 7.4 Public availability of the management plan elements</i>	
Strengths	
Weaknesses	
Compliance	The summary of the management plan is publicly available.
PRINCIPLE 8: MONITORING AND EVALUATION	
<i>Criterion 8.1 Frequency, intensity and consistency of monitoring</i>	
Strengths	
Weaknesses	
Compliance	There is a comprehensive monitoring plan that describes the different parameters for

	monitoring environmental, social and forest impacts. Frequency and intensity is described and the actions are budgeted in the current approved budget. Monitoring information is in clear format available to management.
<i>Criterion 8.2 Research and data collection for monitoring</i>	
Strengths	
Weaknesses	
Compliance	Despite the fact that the company is in an establishment phase, monitoring indicators are established and surveys are done to establish the baseline database. These indicators are done for forest growth, environmental and social parameters. At this stage the income generated are minimal and the investment is made by Greenresources, the holding company. Monitoring is budgeted, the funds allocated and the data collected.
<i>Criterion 8.3 Chain of custody</i>	
Strengths	
Weaknesses	There is a procedure for CoC but the method for identifying the product from the source to the destination is not determined. Staff not trained in CoC. CAR 05 raised.
Compliance	No sales were made yet. The pole treatment plant will be the first component of the processing plant that will be finished and treatment is due to start. The risk is low because it is the only timber producing company in the area. All timber processed is at this stage sourced from the reserve.
<i>Criterion 8.4 Incorporation of monitoring results into the management plan</i>	
Strengths	
Weaknesses	
Compliance	Research and monitoring data is still too fresh to influence management plans. Data is captured on Microforest software to enable the company to improve the database and ultimately management decision making. In areas where data indicated problems with drinking water immediate action was taken.
<i>Criterion 8.5 Publicly available summary of monitoring</i>	
Strengths	
Weaknesses	
Compliance	Summary of monitoring results is publicly available.
PRINCIPLE 9: HIGH CONSERVATION VALUE FORESTS	
<i>Criterion 9.1 Evaluation to determine high conservation value attributes</i>	
Strengths	
Weaknesses	
Compliance	The whole reserve was recently surveyed for an ecological survey by external consultancy. One of the indicators was to identify possible High Conservation Value Forest. The study reveal that the Imanyiro peninsula qualify as HCVF for containing regionally and national significant concentrations of biodiversity values. Although the land is leased from the authority that ultimately has the responsibility for protecting the forest, the company will have the operational function to maintain the forest.
<i>Criterion 9.2 Consultation process</i>	
Strengths	
Weaknesses	
Compliance	The forest identified as High Conservation Forest was identified in cooperation with external

	stakeholders and conservation authorities. It has been part of a National Forest Reserve since the 1950's and authority for its conservation vested in the Government of Uganda. The lease agreement with Busoga now allows Busoga to take management action to conserve and protect the forest.
<i>Criterion 9.3 Measures to maintain and enhance high conservation value attributes</i>	
Strengths	
Weaknesses	
Compliance	The ecological report indicate the forest in a stable condition with a healthy distribution pattern and where natural processes still prevail and natural regeneration still takes place. The whole area is protected and no harvesting takes place. The company has implemented measures to combat deforestation on the eastern side of the forest due to illegal firewood collection and clearing for subsistence farming.
<i>Criterion 9.4 Monitoring to assess effectiveness</i>	
Strengths	
Weaknesses	
Compliance	The whole of the HCVF area is managed for total protection and no harvesting done. Monitoring is focused on the threats to the forest and these are all identified under the social monitoring program. Managers have extensive networks and involvement from external sources to keep them updated with latest development in conservation and management of High Conservation Value Forest.
PRINCIPLE 10: PLANTATIONS	
<i>Criterion 10.1 Statement of objectives in the management plan</i>	
Strengths	
Weaknesses	
Compliance	<p>The management plan explicitly states the objectives as:</p> <ul style="list-style-type: none"> • To establish and manage commercial forest plantations for the production of the maximum volume of sawlogs and transmission poles . • To contribute to the supply of timber resources in Uganda. • To promote the environmental conservation and biodiversity in natural vegetation. • To facilitate socio economic development and poverty eradication among rural communities. • To demonstrate and promote tree planting activities to local communities • To sequesterate carbon and provide a carbon sink in the standing trees. <p>No conversion of natural forest will take place.</p>
<i>Criterion 10.2 Plantation design and layout</i>	
Strengths	
Weaknesses	
Compliance	Plantation design and layout is determined by the plantable area that complies with all the criteria for replanting. Exotic plantations are only established on such degraded forest areas that are not viable to do restoration forestry to recover the natural forest.
<i>Criterion 10.3 Diversity in composition</i>	
Strengths	
Weaknesses	
Compliance	The re-establishment planning makes provision for diversity in species, although at least 50% will be <i>Pinus</i> . Diversity is found in different age compartments of similar stands.

<i>Criterion 10.4 Species selection</i>	
Strengths	
Weaknesses	
Compliance	The species selection is based on the good performance of the species and the proven good economic viability they provide. Selection is narrowed down to a few species of <i>Eucalyptus</i> , <i>Pinus</i> , <i>Msesopsis</i> and <i>Terminalia</i> .
<i>Criterion 10.5 Restoration of natural forest</i>	
Strengths	
Weaknesses	
Compliance	The objectives as spelled out in 10.1 indicate the objectives to promote the environmental conservation and biodiversity in natural vegetation and to sequester carbon and provide a carbon sink in the standing trees. With this in mind the degraded forest areas are planted with plantations. The hilly area down the middle of the reserve and the whole Manyiro peninsula is left as natural vegetation. Additional buffer strips along the streams and a 200 m wide buffer along the lake shore is maintained as natural vegetation. Remnant forest patches that can be restored are restored by enrichment planting where native species are used to re-establish the forest.
<i>Criterion 10.6 Impacts on soil and water</i>	
Strengths	
Weaknesses	
Compliance	The broad soil categories are known and planting continue with the known information. Soils are one of the items listed for short term research by the National Forest Resource Research Institute (NAFORRI) and the Makerere University Kampala (MUK). Soils on the reserve show little erosion.
<i>Criterion 10.7 Pests and diseases</i>	
Strengths	
Weaknesses	
Compliance	The company rely on the advice of experts in the field. Aphids and pine wilt were observed in some of the pine plantations in 2008. An expert was called in and identified the aphids and make management recommendations. No action was needed and the aphids disappeared. Fire fighting measures are in place and the people are trained to fight fires.
<i>Criterion 10.8 Monitoring of impacts, species testing and tenure rights</i>	
Strengths	
Weaknesses	
Compliance	Impacts are assessed prior to commissioning as per 6.1 & 6.2. Evidence of consultation includes the EIA and social impact study done by external parties. Ecological surveys done by external experts. None reported any off-site problems.
<i>Criterion 10.9 Plantations established in areas converted from natural forests after November 1994</i>	
Strengths	
Weaknesses	
Compliance	It is a state reserve and prior to the lease, Busoga Forestry company had no jurisdiction over the land. Illegal settlement and degradation of the forest due to subsistence farming took place because no law enforcement was done. No conversions from natural forests are done.

9. CERTIFICATION DECISION

SGS considers that Busoga Forestry Company's forest management of Bukaleba forests, Uganda can be certified as:

- i. There are no outstanding Major Corrective Action Requests.
- ii. The outstanding Minor Corrective Action Requests do not preclude certification, but Busoga is required to take the agreed actions before March 2011. These will be verified by SGS QUALIFOR at the first surveillance to be carried out about 6 months from the date of the issuance of the certificate. If satisfactory actions have been taken, the CARs will be 'closed out'; otherwise, Minor CARs will be raised to Major CARs.
- iii. The management system, if implemented as described, is capable of ensuring that all of the requirements of the applicable standard(s) are met over the whole forest area covered by the scope of the evaluation;
- iv. The certificate holder has demonstrated, subject to the specified corrective actions, that the described system of management is being implemented consistently over the whole forest area covered by the scope of the certificate.

10. MAINTENANCE OF CERTIFICATION

During the surveillance evaluation, it is assessed if there is continuing compliance with the requirements of the Qualifor Programme. Any areas of non-conformance with the QUALIFOR Programme are raised as one of two types of Corrective Action Request (CAR):

01. **Major CARs** - which must be addressed and closed out urgently with an agreed short time frame since the organisation is already a QUALIFOR certified organisation. Failure to close out within the agreed time frame can lead to suspension of the certificate.
02. **Minor CARs** - which must be addressed within an agreed time frame, and will normally be checked at the next surveillance visit

The full record of CARs raised over the certification period is listed under section 11 below.

The table below provides a progressive summary of findings for each surveillance. A complete record of observations demonstrating compliance or non-compliance with each criterion of the Forest Stewardship Standard is contained in a separate document that does not form part of the public summary.

MAIN EVALUATION	
Issues that were hard to assess	The overlapping lease agreement with the area occupied by Arise Africa is not clear as Busoga does not have full control over the land.
Number of CARs raised	4 Major CARs and 10 Minor CARs were raised. The 4 Major CARs were closed during a subsequent CoF visit.
SURVEILLANCE 1	
Issues that were hard to assess	Much of the problematic issue of the main assessment has been eliminated by excluding the sensitive areas from the scope of the certificate. There remain illegal cropping activities on the FMU and minor CAR 08 is kept open to monitor the amicable solution of this subject. No significant other audit issues were detected. The standard of forest management of the extension of scope area of Kachung plantation is good and equivalent to the existing certified area.
Number of CARs closed	6 Minor CARs were closed.
Nr of CARs remaining open	3 Minor CARs remain open.
New CARs raised	1 Major CAR and 6 minor CARs were raised. The Major CAR M15 was subsequently closed.
Recommendation	The forest management of the forests of Busoga Forestry Company to remain certified as:

	<ul style="list-style-type: none"> ▪ The management system is capable of ensuring that all of the requirements of the applicable standard(s) are met over the whole forest area covered by the scope of the evaluation; and ▪ The certificate holder has demonstrated, subject to the specified corrective actions, that the described system of management is being implemented consistently over the whole forest area covered by the scope of the certificate.
SURVEILLANCE 2	
Issues that were hard to assess	
Number of CARs closed	
Nr of CARs remaining open	
Nr of New CARs raised	
Recommendation	
SURVEILLANCE 3	
Issues that were hard to assess	
Number of CARs closed	
Nr of CARs remaining open	
Nr of New CARs raised	
Recommendation	
SURVEILLANCE 4	
Issues that were hard to assess	
Number of CARs closed	
Nr of CARs remaining open	
Nr of New CARs raised	
Recommendation	

11. RECORD OF CORRECTIVE ACTION REQUESTS (CARs)

01	6.6.5	Date Recorded>	11/3/2010	Due Date>	Next Surveillance	Date Closed>		
		Non-Conformance:						
		Handling and storage facilities do not comply with minimum requirements of ILO and the company procedures.						
		Objective Evidence:						
		PPE in the chemical store is inadequate, safety precautions are inadequate, no eye wash facilities available, no fire extinguisher, no MSDS sheets available and the chemical store responsible person was not properly trained in the operational procedure. SA2011: All the aspects identified during MA2010 have been satisfactorily addressed including the availability of PPE, fire extinguisher is available, MSDS sheets are on site for all the chemicals and the responsible person has been trained in the handling of chemicals. However, a further shortfall has been identified i.e. the lack of a bunding wall at the door of the chemical store to contain any spillage. CAR 01 thus remains open for another 12 months.						

		Close-out evidence:					
02	7.3.3	Date Recorded>	11/3/2010	Due Date>	Next Surveillance	Date Closed>	05/08/2011
		Non-Conformance:					
		Not all activities are supervised and monitored sufficiently to ensure that plans, policies, procedures and contract specifications (for contractors) are adequately implemented.					
		Objective Evidence:					
		Several unsafe actions were observed at the harvesting site where poles were trimmed. Eucalyptus poles were stacked and two operators were crosscutting on top of the stack. Some of the poles were wedged and tensioned by fellow workers while operator makes the cut. Cuts were made unsafe and close to fellow workers feet and legs whilst standing on the unsecure stack as well. The chain guide bars are exceptionally long and create a safety hazard and wasting resources. These were all elementary issues that the site supervisor did not picked up.					
		Close-out evidence:					
		All workers were equipped with adequate PPE at all work sites and adequate supervision was available at all work sites. At all slashing operations all workers were working widely spaced from each other to avoid any potential unsafe situations. No unsafe activities were witnessed. The guide bars on chainsaws have been replaced with shorter guide bars.					
03	6.3.1	Date Recorded>	11/3/2010	Due Date>	Next Surveillance	Date Closed>	05/08/2011
		Non-Conformance:					
		The status of the FMU with regard to the spread of invasive species is not known or estimated.					
		Objective Evidence:					
		<i>Lantana</i> is quite commonly found on the FMU, both in conservation areas and compartment areas. It is being sprayed in both but extent of its spread in conservation zones are not known and mapped and without weed control plan.					
		Close-out evidence:					
		As insufficient evidence was available that this non-conformance has been adequately addressed, this minor CAR 03 was closed and Major CAR M15 was raised under 6.3.3.					
04	6.6.3	Date Recorded>	11/3/2010	Due Date>	Next Surveillance	Date Closed>	
		Non-Conformance:					
		Chemicals are being used on an ongoing basis but there is no strategic plan for the reduction of chemical use.					
		Objective Evidence:					

		<p>Chemicals are discussed in the management plan but not sufficient to justify the use and put reduction of chemical use as an option.</p> <p>SA2011: The revised management plan indicates that the use of chemicals will reduce, especially from the second rotation when grass competition is expected to be lower. However, the volumes and areas over which the individual chemicals were used were not readily available, indicating a lack of management attention to this subject as trend analysis over time has not been done. Usage is also not expressed on a per hectare basis and subdivided according to catchment. A more comprehensive evaluation of the company's approach to chemical use is called for. Although some work has been done in the revised management plan that provides for the reduction in use of chemicals, the CAR remains open for another year to monitor full compliance as set out above.</p>					
		Close-out evidence:					
05	8.3.1	Date Recorded>	11/3/2010	Due Date>	Next Surveillance	Date Closed>	05/08/2011
		Non-Conformance:					
		There is a procedure for CoC but the method for identifying the product from the source to the destination is not determined. Staff not trained in CoC.					
		Objective Evidence:					
		Despite the fact that it is a new certificate and no certified material is handled yet the system is still inadequate developed and implement should the company receive their certificate at this stage.					
		Close-out evidence:					
		Some 17 staff members have been trained in COC procedures on 01/07/2011. All logs are marked sequentially on the butt end. The number of poles produced during harvesting is tallied in-field and diameters are recorded. A monthly pole harvesting report is produced that provides for the block of origin, size classes, number felled, number debarked, number skidded, number stacked, number trimmed, number loaded, number transported to the Masese pole treatment plant in Jinja and the number of rejects. It also provides for the opening and closing stock levels. A delivery note is generated for the internal transfer of poles from the plantation to the pole treatment plant in Jinja. The delivery note contains all the required information, except the statement "FSC 100%" and certificate number because certified material is not yet delivered as the pole treatment plant will only be COC certified in about three years. A goods received note is also generated by the pole treatment plant to confirm receipt of the poles specified on the delivery note.					
06	4.4.3	Date Recorded>	11/3/2010	Due Date>	Next Surveillance	Date Closed>	05/08/2011
		Non-Conformance:					
		The stakeholder list provided did not include all stakeholders as identified.					
		Objective Evidence:					
		The stakeholder list provided did not include the NGO Arise Africa, an important stakeholder with whom conflict exist over the lease agreement of a portion of the FMU					
		Close-out evidence:					
		An updated list of stakeholders is available which includes Arise Africa International.					
M 07	1.2.1	Date Recorded>	11/3/2010	Due Date>	Next Surveillance	Date Closed>	28/2/2011
		Non-Conformance:					
		There is evidence of some required payments that have not been made.					
		Objective Evidence:					

		<p>Although the company has made efforts to meet the above taxes, there is lack of evidence of payments for the Local Government Service Tax to Jinja and Mayuge District Local Governments, which is a requirement under law for people who earn a monthly salary of UGX 100,000 and above.</p> <p>Close-out evidence:</p> <p>Taxes in arrears were paid and receipt no 5704 for Maguya for US 700 000 and receipt no 25754 from Jinja for the amount of 1 660 000 was provided. An amount of UGX28 868 500/= per month has been budgeted in the new budget for future payments. CAR closed.</p>				
08	1.5.1	Date Recorded>	11/3/2010	Due Date>	Next Surveillance	Date Closed>
		Non-Conformance:				
		Forest Managers have not taken reasonable measures to monitor, identify and control illegal harvesting, settlement and other unauthorised activities.				
		Objective Evidence:				

		<p>Much as the management of Bukaleba Forest Plantation has instituted measures to halt illegal activities on its FMU, illegal grazing, cultivation of agricultural crops and settlement still persists and were evident during the field assessment.</p> <p>SA2011: The company makes use of local patrol men for patrols and also use local leaders to sensitize communities and use seminars to educate people. Signposts have been erected at various points within the FMU indicating No Trespassing, No Grazing and No setting of fire. However, illegal activities such as illegal settlement, cultivation and grazing still persist in Bukaleba plantation. This includes the cultivation of mealies amongst young stands which compete with the tree crop, within part of the HCVF on Imanyiro peninsula where about five families have settled illegally and also within the 200 m buffer zone along the shore of lake Victoria where a fishing village has been established. The landowner, National Forestry Authority (NFA), made it clear that they are responsible to resolve the issue of illegal cultivation, due to the historical nature of the problem stemming from disbanded Government projects. Similar problems exist on a number of other NFA areas and have become politicised. The company acknowledges the seriousness of the situation and has commissioned a consultant to explore the available options to resolve the situation amicably. A first draft report dated July 2011 is available. Current avenues being considered include:</p> <ol style="list-style-type: none"> 1. Form committees at various levels to monitor any agreements that are reached. 2. Persuade NFA to allow intercropping with trees/crops on the current 500 ha excised area of the Forest Reserve that is outside the certified FMU to reduce social pressures. 3. Conduct more sensitisation meetings to improve awareness and understanding about the situation amongst local people. 4. Buy time to allow canopy closure to effectively prevent any intercropping. <p>In practice the company has given transgressors until 31/07/2011 to harvest their crops and to stop all illegal cropping activities. The company obtained the support of the community police section to patrol the area once/week and provide them with fuel for this purpose. The police will initially inform and communicate with local people only. The support of the District National Resources Department has also been obtained to specifically address the illegal cultivation and settlement within Imanyiro peninsula and along the lake shore. When the rains start in September/October arrests will be made if any new plantings take place and action will be taken to force transgressors off the Forest Reserve, including the HCVF area on Imanyiro peninsula.</p> <p>The company is prepared to allow the growing of low-growing crops (e.g. beans and soya) as opposed to the current practice of higher-growing mealies which are detrimental to the growth of tree plantation crops. However, the landowner NFA is not prepared at this point to allow any form of taungya. Any solution will have to involve all four parties i.e. BFC/NFA/Local Government and local communities.</p> <p>The company anticipates that their efforts will lead to a solution where an agreed list of local people will cultivate low-growing crops on designated areas and that this will carry the approval of the NFA. An amicable solution is the desired end result. Due to the complexity of the situation including the numbers of stakeholders involved, the CAR is kept open for another 12 months to monitor the success of the current approach to solve this issue.</p> <p>Close-out evidence:</p>					
M 09	4.2.5.	Date Recorded>	11/3/2010	Due Date>	Next Surveillance	Date Closed>	1//3/2011
Non-Conformance:							
Not All necessary tools, machines, substances and equipment, including appropriate PPE, are available at the worksite and are in safe and serviceable condition.							
Objective Evidence:							

		<p>Although the company workers had been provided with Appropriate PPE (Personal Protective Equipment), workers found in Compartment BO4, crosscutting and sorting poles had no First Aid Kit. They were only equipped with overalls, gumboots and gloves. None of them had also received training in the use of first aid.</p>					
		Close-out evidence:					
		<p>First Aid kits are provided to the teams in the field. A total of 31 people were trained and received a "First aid at Workplace" certificate from the Uganda Red Cross society. It was a four day course and included lessons on the first aid kit. The rest of the PPE were in place during the audit. CAR closed.</p>					
M 10	2.3.3.	Date Recorded>	11/3/2010	Due Date>	Next Surveillance	Date Closed>	28/2/2011
		Non-Conformance:					
		There are still tenure and/or use right disputes that are unresolved.					
		Objective Evidence:					
		<p>Although the company has followed law, the Arise situation represents a significant dispute that requires either a speedy resolution or a redefining of the boundaries of the FMU to exclude the area of conflict from the scope of the certificate. The company is confident that it will be resolved and not of substantial magnitude and involving a significant number of interests that should disqualify the operation from being certified.</p> <p>Currently, the system in place to either relocate the people in illegal settlements to alternative sites off the FMU or to redefine the boundaries of the FMU so as to exclude these areas so that the ecological functions of the forests is not jeopardised is not resolved.</p> <p>For example around the peninsular, people are cultivating crops beyond the buffer zone without leaving the stipulated 200 m.</p>					
		Close-out evidence:					
		<p>The boundaries of the FMU have been re-defined to exclude the Arise Africa area and all the other areas that have illegal settlements and activities from certification. This reduces the area under consideration for certification from 9 165 ha to 7 613 ha (a reduction of 1 552 ha). All the area is reduced from the production forest. The boundaries with the settlements are mainly fences. The boundary with Arise Africa is a "GIS exercise" and run along the road and ridge line. The licence agreement dated 18 /4 /2008 between the NFA and Busoga was reviewed in this regard. Major CAR 10 closed.</p>					
11	6.7.1	Date Recorded>	11/3/2010	Due Date>	Next Surveillance	Date Closed>	05/08/2011
		Non-Conformance:					
		Non-organic wastes (e.g. oil, tyres, containers, etc.), including those generated by contractors working on the FMU are not recycled where possible.					
		Objective Evidence:					
		There was evidence of non-organic waste littered around the compound. Dustbins were provided but not used.					
		Close-out evidence:					
		<p>Dustbins are available and were in use and basic separation into plastics, bottles/cans and organic material is done. Empty plastic chemical containers are first triple rinsed, punctured and then stored prior to being transported to recycling facilities in Jinja and Lira. No serious signs of littering were observed and all old filters and oils are collected and stored for re-use or disposal to private recycling agencies in the nearest towns.</p>					
12	7.3.1	Date Recorded>	11/3/2010	Due Date>	Next Surveillance	Date Closed>	05/08/2011
		Non-Conformance:					

		<p>Not all Forest workers at all levels of skill and responsibility are appropriately educated and trained in the tasks they are assigned to and company policy and procedures.</p> <p>Objective Evidence:</p> <p>The lady dispensing chemicals not being trained in the procedure.</p> <p>Mechanic not trained in procedure for oil spills.</p> <p>The Logging supervisor was not aware of the emergency help to give his crew team/ the workers in case of injury at work. He was not aware of the compartment where the operation was taking place.</p> <p>Close-out evidence:</p> <p>Significant effort has gone into more training programmes for staff. This includes courses on handling and safety of chemicals, first aid training and harvesting procedures. A health and safety assessment was also done which resulted in further training on health and safety being scheduled for September 2011. Training courses on pest and disease management, plantation maintenance activities, forest inventory planning and management and contractor management were also attended by various staff members. A comprehensive training plan for 2011 is available that covers all categories of employees.</p>					
M13	8.3.5	Date Recorded>	30/4/2010	Due Date>	30/7/2010	Date Closed>	26/7/2010
		Non-Conformance:					
		Use of the FSC trademark is not in accordance with policy and has not been approved by SGS Qualifor.					
		Objective Evidence:					
		The annual report 2008 / 2009 on page 7 uses the FSC logo without approval.					
		Close-out evidence:					
		<p>Close out evidence that was verified included:</p> <ol style="list-style-type: none"> 1. Written notice to all company heads within the group explaining the importance of getting the correct approval for the correct use of the FSC trademark. The emailed notice emphasizing the importance of getting authorization and explain the trademark use. 2. Request from all company heads that all trademark use requests within the group are carried out through the Group FSC Managers' office. The notice explain that no trademark is used if not cleared by the Group FSC manager. The group is multinational and all countries and affected Business units were included in the notification. 3. Request that all use of the FSC logo/trademark, the letters "FSC" and "Forest Stewardship Council" fully comply with the instructions above or must be stopped forthwith. Where possible, all material that does not comply must be withdrawn, or alternatively a corrigendum issued instructing the removal of the trademark or letters, as appropriate. It was further verified at one of the group's other affiliates and all trademarks were removed from documentation found. 4. To prevent recurrence, an appropriate instruction will be included in the employee handbook, and will be incorporated into the employee induction/orientation program. Changes to handbook were made and all management staff at Bukaleba was retrained. Attendance sheet of the training was provided. The handbook views it along with serious transgressions that could face disciplinary measures. <p>This CAR was issued against the group and was addressed in group context. All information was communicated to other affiliates in other countries as well as with the holding company in Europe. CAR closed.</p>					
14	9.3.3	Date Recorded>	2/2/2011	Due Date>	Next surveillance	Date Closed>	05/08/2011

		Non-Conformance:					
		Specific measures to be taken to enhance the identified attributes of HCVF are not described in the public summary.					
		Objective Evidence:					
		The public summary does not contain specific measures.					
		Close-out evidence:					
		The summary of the management plan, which is available on the company website, contains a description of the measures to maintain the HCV attributes. These include aspects such as conducting a biodiversity and ecological survey (this has been done and a report is available), identifying other ecologically sensitive areas and enrichment plantings where necessary. Only indigenous tree species will be used and locally sourced seed shall be used where possible. These will include <i>Maesopsis eminii</i> , <i>Khaya anthotheca</i> and other species native to the area. These will be planted in groups and in identified gaps. Wildlife population movement in Imanyiro peninsula will be monitored. The issue of prime importance for both HCVFs is protection to ensure that they are maintained in a sustainable state.					
M15	6.3.3	Date Recorded>	05/08/2011	Due Date>	04/11/2011	Date Closed>	10/10/2011
		Non-Conformance:					
		Ecological functions are not always maintained and there is not a programme for the restoration of degraded sites.					
		Objective Evidence:					
		Minor CAR 03 was raised in MA2010 on the lack of a distribution map and a weed control plan for Lantana. High density Lantana areas have now been mapped using Google-earth which placed 264 ha into this category. Weed control operations have been scheduled per month but these activities are limited to weeding for plantation establishment purposes only. No attempt has been made to prepare a more detailed infestation map based on ground truthing, covering all invasive spp such as Lantana and paper mulberry (<i>Broussonetia papyrifera</i>). A proper weed control plan is not yet available that uses such map to prioritise and schedule eradication work of invasive spp based on a motivated strategy which will achieve clear objectives over a defined period. Minor CAR 03 was closed and Major CAR M15 was raised.					
		Close-out evidence:					
		A detailed mapping exercise has been undertaken based on ground surveys and good quality maps produced showing the distribution of Lantana, paper mulberry and <i>Senna spectabilis</i> . A classification system was developed to describe the various intensity levels of infestation. A control strategy has been formulated based on slashing and herbicide application. Slashing and herbicide control follows an approach of prioritizing the least affected areas first and moving from them to the most highly affected areas last. This is in line with generally accepted weed control practices. A proper weed control plan has been compiled for both Bukaleba and Kuchung FMUs. It provides for the slashing and herbicide control of all affected areas on a scheduled basis assigning priority to compartments for clearing each month until June 2013.					
16	8.2.4	Date Recorded>	05/08/2011	Due Date>	Next Surveillance	Date Closed>	
		Non-Conformance:					
		Data are not collected on the composition and observed changes in the flora and fauna and the effectiveness of conservation activities.					
		Objective Evidence:					
		The bulk of conservation efforts are focussed on the protection of the HCVF on Imanyiro peninsula. Plans are in place to establish some 47 PSPs in this area over the period 01/01/2011 to 15/02/2012 which will include assessing elements such as spp diversity, biomass and natural regeneration. However, no implementation has yet taken place and no data has yet been collected and analysed.					

		Close-out evidence:				
17	4.2.5	Date Recorded>	05/08/2011	Due Date>	Next Surveillance	Date Closed>
		Non-Conformance:				
		All necessary equipment, substances and PPE are not always available at work sites or in a serviceable condition.				
		Objective Evidence:				
		One out of seven work sites visited did not have a first aid kit available for any emergency. This is thus viewed as an exception and does not justify the raising of a Major CAR on the basis of a recurrence (M09). The available first aid kits were not always adequately equipped to deal with serious bleeding wounds. This is of some importance as sharp hand tools are used at many work sites, thus presenting serious bleeding wounds as a real possibility. The road maintenance team as well as the thinning team did not have any drinking water available for workers, whilst in a number of instances the workers did not have any protection against UV radiation (hats).				
		Close-out evidence:				
18	4.2.4	Date Recorded>	05/08/2011	Due Date>	Next Surveillance	Date Closed>
		Non-Conformance:				
		Forestry operations do not always comply as a minimum, with the ILO Code of Practice on Safety and Health in Forestry.				
		Objective Evidence:				
		Poor felling techniques are being followed in the transmission pole harvesting operations. Either no, or a very minimal, fore cut is made, with the back cut mostly at the same cutting height – this results in most cases in no hinge forming to assist with directional felling and to act as a safety measure against potential kicks back. There was no evidence of a planned harvesting operation and of directional felling in this operation in compartment C018 on Bukaleba plantation.				
		Close-out evidence:				
19	8.2.8	Date Recorded>	05/08/2011	Due Date>	Next Surveillance	Date Closed>
		Non-Conformance:				
		Inadequate data is kept on the productivity and efficiency of forest management activities.				
		Objective Evidence:				
		Management production controls are sometimes inadequate. The records of transmission poles harvested during July 2011 do not reconcile with each other. Although the closing stock record for the period is 390 poles, the monthly harvesting report indicate that 380 were harvested – the difference can not be accounted for by e.g. defect trees or carry over stock. One supervisor also completed and kept the production records of his team at home, putting the reliability and credibility of his control system at risk.				
		Close-out evidence:				

20	9.1.1	Date Recorded>	05/08/2011	Due Date>	Next Surveillance	Date Closed>	
		Non-Conformance:					
		The FMU has not been assessed in consultation with conservation organisations, regulatory authorities and other local and national stakeholders for the presence of any HCVF attributes.					
		Objective Evidence:					
		The company used the Proforest HCVF toolkit to assess the Kachung FMU for the presence of HCV attributes. The presence of HCV 1: "Forest areas containing nationally significant concentrations of biodiversity values where viable populations of most naturally occurring spp exist," has been identified in an internal company report compiled in October 2010. However, although the area is now being managed as a HCVF, the report and its findings have not been presented to acknowledged experts and conservation organisations for evaluation and comment, and do therefore not present a conclusive finding.					
Close-out evidence:							
21	4.1.7	Date Recorded>	05/08/2011	Due Date>	Next Surveillance	Date Closed>	
		Non-Conformance:					
		Not all employees receive benefits which meet or exceed all legal requirements.					
		Objective Evidence:					
		The company has formal contracts in place with various contractors for activities such as slashing, weed control and pruning. However, many of these contractors do not in turn have employment contracts with their workers used in these operations.					
Close-out evidence:							

12. RECORD OF OBSERVATIONS

OBS #	Indicator	Observation Detail			
01	4.2.9	Date Recorded>	11/3/2010	Date Closed>	05/08/2011
		Observation:			
		Drinking water is provided in rainwater tanks but there is no purification system.			
		Follow-up evidence:			
				Drinking water is now produced from wells where signboards have been put up, in English and the local vernacular, to warn users that water must first be boiled before use. Water used by workers in-field is first treated with a water purification tablet before use.	
02	10.4.3	Date Recorded>	11/3/2010	Date Closed>	05/08/2011
		Observation:			
		Seed source was not verified during the main assessment.			
		Follow-up evidence:			

OBS #	Indicator	Observation Detail			
		Seeds are now sourced from the Tanzania Tree Seed Agency (TTSA), but used to be obtained from the National Tree Seed Centre (NTSC) in Kampala, Uganda. In the case of seed from TTSA all seed are delivered in one kg bags with a label attached that provides for sp name, local name, batch number, provenance, quantity, germination percentage and date of collection. In the case of seed from NTSC labels provide for sp, locality (provenance), seed lot number, date collected and quantity.			
03	6.2.1	Date Recorded>	05/08/2011	Date Closed>	
		Observation:			
		The biodiversity monitoring plan for Kachung plantation concludes that no RTE spp occur on the FMU. This statement has not been corroborated by the IUCN classification of all the spp that have thus far been identified as occurring on the FMU, thus introducing an element of uncertainty regarding this statement, particularly since it is also recorded in the management plan that <i>Vitelaria paradoxa</i> (shear butternut) has been listed as an endangered species on Kachung.			
		Follow-up evidence:			
04	8.1.3	Date Recorded>	05/08/2011	Date Closed>	
		Observation:			
		There is currently a plethora of monitoring documents such as on biodiversity, social impacts, PSP procedures, etc whilst an overall Monitoring Plan which was said to be available, could not be witnessed. There is a need for a more holistic approach to integrate and simplify all monitoring activities.			
		Follow-up evidence:			
05	4.2.8	Date Recorded>	05/08/2011	Date Closed>	
		Observation:			
		Employees should be supplied with some kind of company identification to facilitate their easier admission at Health Centres supported by the company. Such a lack has lead to unnecessary delays and frustration from workers on occasion in obtaining medical care.			
		Follow-up evidence:			
06	4.3.3	Date Recorded>	05/08/2011	Date Closed>	
		Observation:			
		Consideration should be given to the formation of a worker committee or similar to facilitate better communication between the company and workers.			
		Follow-up evidence:			

13. RECORD OF STAKEHOLDER COMMENTS AND INTERVIEWS

Nr	Comment	Response
	Main Evaluation	
	No written comments or complaints were received. All comments listed were the result of stakeholder interviews during the audit.	

Nr	Comment	Response
Main Evaluation		
1	<p>Community projects put in place by BFC</p> <ul style="list-style-type: none"> • Recognise construction of health centres (e.g. Nkombe Health Centre II) and provision of medical equipment to health centres. • Provision of mosquito nets to pregnant women and children. 	Positive contribution and acknowledged.
02	<p>Forest Tenure.</p> <p>Aware that Bukaleba is a forest reserve and acknowledge that their settlements are illegal but have no alternative land where to settle.</p>	It is a legal and government issue that needs to be settled. The people acknowledge the fact that they are illegal. There is no dispute about that, but the activity must still stop. Ref CAR 8.
03	<p>Relationship with BFC staff.</p> <p>BFC staff frequently cut down their crops and that they have been denied rights to graze and do Taungya farming in the reserve.</p>	This stems from the disputes from illegal settlements and is addressed by CARs 8 & 10.
04	<p>Employment opportunities.</p> <p>Acknowledge that the company offers them employment opportunities to work as casual labourers</p>	Positive comment noted.
05	<p>Access rights to the forest.</p> <ul style="list-style-type: none"> • They are allowed to harvest dead wood, thatch grass and water • They are also allowed to access the burial grounds (grave yards) and other ASI –the Walumbe worship tree) • Acknowledge that BFC staff respect their grave yards and the Walumbe tree (worship place) • However, they mentioned that their rights of access to the forest have diminished and they are no longer allowed to graze and cultivate in the forest but acknowledge that they still do it illegally 	Granting of access rights to the forest is compliant with the standard.

Nr	Comment	Response
Main Evaluation		
06	<p>Recruitment Process and remuneration and their terms of conditions.</p> <ul style="list-style-type: none"> • Recruitment is fair and as long as you are willing to work and you're of 18 years of age • Recognise that they are paid fairly compared to those who work outside the FMU on the casual basis and that their work is sustainable • They are free to leave and to form any association. • Recruitment is done on merit as long as you have the right qualifications 	<p>Recruitment process perceived to be fair by outsiders and staff and is noted.</p>
07	<p>PPE and Health.</p> <ul style="list-style-type: none"> • Acknowledge that the company provides them with adequate PPE. However, the company does not cater for their medication and their families. Medication is provided for in case of only injury at work • They are not provided with First Aid Kit, no training in the use of First Aid • They are provided with PPE at work. The company has a medical insurance scheme that provides medication to staff and members of their families. However, no first aid training had been done for the staff 	<p>Positive attitude and gratitude towards the company noted. It is in line with standard requirements.</p> <p>Query also verified in field and addressed with CAR 9.</p>
08	<p>Community Development Projects initiated and supported.</p> <ul style="list-style-type: none"> • Applaud the company for their efforts to support construction and support of health centres (e.g. Nkombe Health Centre II) • Support to women through provision of mosquito nets particularly to pregnant • Acknowledge the company for supporting female bright students in the area with school fees and other scholastic needs/ materials 	<p>Positive comment towards the company acknowledged.</p>
09	<p>Employment opportunities to local people.</p> <p>Local people are employed by the company and that recruitment of local people is done on merit without discrimination</p>	<p>Positive perception about company in line with standard requirement on the issue.</p>

Nr	Comment	Response
Main Evaluation		
10	<p>Access rights of local people.</p> <p>Local people have been denied some access rights like cultivation and grazing but local leaders agree with company that such activities are illegal in forest reserves and that conflicts with local people are amicably sorted out. They do recognise that the company follows right channels in handling access rights to local people and other forest users.</p>	<p>The company's right way of dealing with conflicting issues are acknowledged as well as the cooperation of the community leaders in this regard. Supportive evidence for the compliance of 2.3.3. despite CAR 10.</p>
11	<p>Relationship with company staff.</p> <p>Acknowledge that they are in close contact with BFC staff and whenever there are issues to discuss they are informed. Frequently meet and consult each other on matters pertaining to the management of the forest like boundary, access rights, and handling of illegal activities</p>	<p>Good relationship between company and local structures are acknowledged.</p>
12	<p>Salaries and wages.</p>	<p>Staff appears satisfied with their conditions and remuneration.</p>
13	<p>Terms of Service.</p> <p>Staff are free to leave the company, free to form an association</p>	<p>Staff appears satisfied with their conditions and remuneration.</p>
Surveillance 1		
<p>No written comments or complaints were received. All comments listed were the result of stakeholder interviews during the audit.</p>		
01	<p>Local residents Walumbe and Bukaleba villages, Bukaleba plantation</p> <p>BFC has brought development in the area through employment to local people, maintaining roads, planting trees for conserving the environment and allowing them to collect firewood, thatch grass and water for domestic use</p>	<p>Positive comments acknowledged.</p>
02	<p>Issues raised by local people in Walumbe and Bukaleba villages</p> <p>Cutting of crops and denying local people a chance to graze in the reserve by the company</p> <p>Another issue raised was the 500 ha of the land occupied by the villages of Nakalanga and Bukaleba which the company had promised to cut out of the FMU. Local people were worried of the pending eviction since they had not got a formal communication on whether the land had actually been given to them</p>	<p>Management has met them and explained that these activities are not allowed in the reserve.</p> <p>Negotiations are in place between NFA, the landowner, the company and local communities to redefine the boundary and to excise the 500 ha out of the FMU. The company is of the view that once this process is finalised, there will be harmony between the local people and its operations.</p> <p>Both aspects above are captured in minor CAR 08 in 1.5.1.</p>

Nr	Comment	Response
Main Evaluation		
03	<p>Nursing Assistants, Nkombe Health Centre II</p> <p>The company has built a maternity ward at Nkombe Health Unit. The company also support the health unit by equipping it with drugs, gloves and other medical equipment.</p> <p>However, the company does not provide documents for identification of its workers and this becomes difficult to differentiate them and their families from other locals when they seek from medical treatment from the health unit.</p>	<p>Positive comment acknowledged.</p> <p>Observation 05 was raised in 4.2.8.</p>
04	<p>Casual workers of the company</p> <p>The company has not issued them with contracts. Some of the casual workers had worked on the FMU for more than six months and wondered how long it takes to get contracts.</p> <p>Workers appreciated the medical services provided by the company but reported that they have not been provided with identity cards to enable them and their families easily access medical services at the designated health units.</p>	<p>The company welcomed the idea of providing identification to its casual workers. On the issue of contracts the company noted that casual workers are subcontracted by the contractors and they are going to instruct contractors to issue them with contracts.</p> <p>Minor CAR 21 was raised in 4.1.7.</p> <p>Observation 05 was raised in 4.2.8.</p>
05	<p>Nurse-in charge Adok Health Centre II</p> <p>The company has built a paediatric ward and supports the health unit with medical equipment. They also provide medical treatment to the company workers. They suggested that the company provides them with a list of their workers to enable them easily access health services.</p>	<p>Positive comments acknowledged. Observation 05 was raised in 4.2.8 on subject of identification of workers.</p>

Nr	Comment	Response
Main Evaluation		
06	<p>Local people in Abenyonya B and Agebo A villages, Kachung Plantation</p> <p>They acknowledge the role of the company in:</p> <p>Creating employment for local people. Local people working for the company are able to pay school fees for their children.</p> <p>The company also helps in rehabilitating and constructing shallow wells for domestic water use. It has also constructed a building block at the Adok Health Centre II.</p> <p>They are allowed to collect dead wood for firewood.</p> <p>The company allows them to grow low-growing cover crops such as sim sim, ground nuts and beans as inter-crops in newly planted areas.</p> <p>The company provided training and tree seedlings for tree planting thus helping in protecting the environment.</p> <p>They also noted that the company does follow up visits to ensure that local people who had received trees actually plant them.</p>	Positive comments acknowledged
07	<p>Local people in Abenyonya B village</p> <p>Locals complain that they are not allowed to graze and hunt in the forest reserve.</p> <p>They are heavily fined before they can get back their livestock and trap materials.</p>	The company states that grazing and hunting in forest reserves are illegal under the Uganda Wildlife Act and the National Forestry and Tree Planting Act and it is following the law in handling the offenders. They however had a series of meetings where local people have been sensitized about the two illegal activities.
Surveillance 2		
Surveillance 3		
Surveillance 4		

14. RECORD OF COMPLAINTS

Nr	Detail		
	Complaint:	Date Recorded >	11/3/2010
	No complaints were received.		
	Objective evidence obtained:		

Nr	Detail		
	N/A		
	Close-out information:	Date Closed >	dd MMM yy

End of Public Summary