



Management System Report applicable to:
Stage 2-, Surveillance- and Recertification Audit

F74.fm
Rev No.00

Sappi Southern Africa Ltd
Attention: Dr D Everard

17 Montrose Park Boulevard,
Victoria Country Club Estate,
Pietermaritzburg
3201

14/09/2018

Dear Dr D Everard

STAGE 2 AUDIT REPORT

Thank you for the co-operation and courtesies extended to our auditors during the audit of your company against the requirements of **SAFAS 4:2018**.

A stage 2 audit enables the Certification Committee of African Certification and Testing (Pty) Ltd to assess the overall effectiveness of the Management System of a registered supplier in order that the certification can be granted for the certification period as stated in the certification documentation. This process includes the audit of the performance of an organisation's management system over the certification period and includes the validation whether all sites and processes were assessed during an audit.

Included is a report detailing the findings of the audit together with the conclusion and statement of conformance and non-conformance.

You are welcome to contact us should you have any questions regarding the content of the report.

Yours faithfully

JF Pienaar
Audit team leader
African Certification and Testing (Pty) Ltd



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Client: Sappi Southern Africa Ltd (also referred to as Sappi in the report)

Postal Address (Head Office):

17 Montrose Park Boulevard,
Victoria Country Club Estate,
Pietermaritzburg
3201

Physical Address (Head Office):

17 Montrose Park Boulevard,
Victoria Country Club Estate,
Pietermaritzburg
3201

Sites audited:	Date of audit:	Processes Audited:
Sappi Southern Africa, Forestry Divisional Head Office (central function)	21/08/2018	Activities of the central function (stage 1 audit)
Karkloof	27/08/2018	Harvesting and transport to market
Ixopo	28/08/2018	Planting and silvicultural activities
Richmond	29/08/2018	Tree breeding and seedling and cutting production
Umvoti North	30/08/2018	Harvesting and transport to market
Umvoti South	31/08/2018	Tree breeding and seedling and cutting production
Hlelo	03/09/2018	Planting and silvicultural activities
Audit objectives	<ol style="list-style-type: none"> 1. Determination of the conformity of the client's management system. Or parts of it, with audit criteria. 2. Determination of the ability of the management system to ensure the client meets applicable statutory, regulatory and contractual requirements. 3. Determination of the effectiveness of the management system to ensure the client can reasonably expect to achieve its specified objectives. 4. As applicable, identification of areas for potential improvement of the management system. 5. To evaluate the implementation, including effectiveness, of the client's management system. The stage 2 audit shall take place at the site(s) of the client, and includes the following: <ol style="list-style-type: none"> a. Information and evidence about conformity to all requirements of the applicable management system standard or other normative documents, b. Performance monitoring, measuring, reporting and reviewing against key performance objectives and targets (consistent with the expectations in the applicable management system standard or other normative document), c. The client's management system ability and its performance regarding meeting of applicable statutory, regulatory and contractual requirements, d. Operational control of the client's processes, e. Internal auditing and management review, <p>Management responsibility for the client's policies.</p>	
Audit scope	<p>Site and Organizational unit: The site details are enlisted under the relevant dates.</p> <p>Activities and processes as stipulated in SAFAS 4: 2018.</p>	
Audit criteria	<p>Applicable statutory, Regulatory requirements as per SAFAS 4: 2018.</p> <p>Contractual requirements as per ACT certification agreement.</p> <p>The requirements of SAFAS 4: 2018.</p> <p>The defined processes and documentation of the management system developed by the client.</p>	



Deviations from the audit plan (with their reasons):

There were no deviations from the audit plan.

Any significant issues or factors that impacted the audit programme:

Sappi Southern Africa applied for a Corporate multi-site certification as they have ownership of all their sites. They are therefore not considered as a Group Certification.

If applicable: The audit was combined, joint or integrated with: Not applicable.

Note: The audit is based on a sampling process of the available information. Therefore, where no non-conformities are identified it does not necessarily mean that none exist.

Scope of Registration:

Management of plantations, the associated infrastructure and unplanted areas associated with the plantations.

EA Code/s: 6

Certificate No: At this stage Sappi is not certified, they have the reference code: Sappi/01

Date of audit: Refer to page 2

Date of report: Refer to page 1

Auditing team and accompanying persons:

1. JF Pienaar (Audit Team Leader)
2. GE Hayter (Technical Expert)

Contents of the report

Audit results

Criteria and indicators for sustainable forest management as per SAFAS 4:2018

1. Planning, legal compliance and chain of custody
2. Engagement with stakeholders and the protection of cultural heritage
3. Protection of workers and human rights
4. Protection of soil, carbon and water
5. Conservation of biodiversity and ecological integrity
6. Forest health and protection
7. Economic sustainability
8. Stage 2 audit Data
9. Audit plan and schedule
10. Unresolved diverging opinions
11. Corrective Action
12. Significant changes, if any, that affect the management system of Sappi since the last audit took place
13. Audit cycle analysis
14. Conclusion

AUDIT RESULTS

Summary of non-conformities against the requirements of SAFAS 4:2018 and against statutory and regulatory requirements:

There were:

- 2 minor non-conformities and
- **0 major non-conformities** recorded against the requirements of SAFAS 4:2018 and
- 0 against the statutory and regulatory requirements.

The following statutory requirements for the company were verified:

Applicable laws, regulations, nationally ratified international treaties, conventions and agreements as per Appendix 1 of SAFAS 4:2018.

The non-conformances recorded were as follows:

Reference Number	Department/ Location	Classification of non-conformance	Description of Non-Conformance	Due Date
JFP01	Forest health and protection (refer to 6.2.2 in this report).	Minor	At the time of the audit it was witnessed that a waste disposal site on an FMU was not managed according to industry best practice guidelines in that hazardous waste (chemical containers) was not safely disposed of.	Before certification decision can be made.
JFP02	Protection of workers and human rights (refer to 3.2.6 in this report).	Minor	At the time of the audit there were past incidents recorded at farm level (in field) but not on the Sappi system (incidents dated: 17/02/2018, 06/08/2018 and 07/08/2018). For these incidents trends could not be examined nor could safety practices be adjusted to avoid recurrence.	Before certification decision can be made.

CRITERIA AND INDICATORS FOR SUSTAINABLE FOREST MANAGEMENT AS PER SAFAS 4:2018

Legend:

Symbol	Interpretation
C	Conformance
NC	Non-conformance

Note: Comment include comments of conformance or non-conformance and/ or documented information verified during the audit

1. Planning, legal compliance and chain of custody

1.1	Legal compliance	C / NC
1.1.1	Plantations are established in accordance with, 1) Applicable laws and regulations and administrative requirements, 2) Legal and customary rights	C
Comment	Sappi complies with the National Water Act (No 36 of 1998). The title deeds/ water management database contains the required information of Sappi's sites Documented information: <ul style="list-style-type: none"> Environmental legal register (NA2doc001 - version 2.3, dated 23 November 2016): document contains the applicable statutory requirements referenced to Sappi's own processes. Procedure for title deeds and water use license (Eg0doc045 – version 2.2). 	
1.1.2	The boundaries of Management Units are marked, mapped or described.	C
Comment	Title deed land maps were available and indicate FMU boundaries.	
1.1.3	There shall be no substantiated outstanding claims of legal non-compliance	C
Comment	There are no outstanding legal claims of legal non-compliance related to plantation management against Sappi. Documented information: Annual integrated report 2017, page 64 corporate governance.	
1.1.4	Prior to any listed site disturbing activities, environmental impact assessments as required by legislation shall be undertaken for any developments on the FMU and records of decision complied with.	C
Comment	Sappi complies with the National Environmental Management Act (No. 107 of 1998). NEMA EIA regulations are consulted before undertaking activities as required	



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1.2	Management planning and monitoring	C / NC
1.2.1	<p>The management plan and plantation map address the operational requirements of the FMU and is consistent with the organizations policies and broader management objectives.</p> <p>The key elements of Sappi's management plans are as follow:</p> <ul style="list-style-type: none"> a. management objectives with verifiable targets where these are possible, b. description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands, c. description of silvicultural and/or other management system, d. rationale for rate of annual harvest and species selection, e. provisions for monitoring of forest growth and dynamics, f. environmental safeguards based on environmental assessments, g. plans for the identification and protection of rare, threatened and endangered species, h. maps describing the forest resource base including protected areas, planned management activities and land ownership, i. description and justification of harvesting techniques and equipment to be used. j. requirements of national legislation. 	C
Comment	<p>Documented plans show all required aspects Plantation management plans (PMP) are used at the plantation level</p>	
1.2.1	<p>The management plan is reviewed annually and where necessary are updated to incorporate:</p> <ul style="list-style-type: none"> 1) Monitoring results, including results of certification audits. 2) Inputs from stakeholder engagement. 3) New scientific or technical information. 4) Changing environmental, social or economic circumstances. 	C
Comment	<p>Documented information:</p> <p>20-year plan: Executive level (reviewed annually, usually during February).</p> <p>3-year tactical plan: GM level and area managers (Research department drives with regards to species and research). KwaZulu-Natal establishment plan (1 April 2018 to 31 March 2020) reviewed on March 2018. KZN Harvesting APO October 2017 to Sept 2018 (as per financial period).</p> <p>Annual plan and modelling: APO cruise. Sappi conforms to the SAFAS 4:2018 requirements: 2.2.4, 4.1.2, 4.1.4, 5.2.3, 5.3.4, 5.3.5, 5.3.6, 5.3.7, 6.4, 7.2.3 and 7.2.5.</p>	
1.2.3	<p>A summary of the management plan in a format comprehensible to stakeholders including maps and excluding confidential information is made available to the public on request at no cost.</p>	C
Comment	<p>Sappi have a policy that encourage an open communication regarding stakeholder, as for queries:</p>	



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	<p>General queries: The Sappi website contains the annual sustainability report. Annual integrated report is made available to shareholders and available on request for stake holders.</p> <p>Specific queries: Plantation management plan (PMP) is made available.</p>	
1.2.4	<p>Forest management shall be based inter-alia on the results of scientific research. Forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organisations, as appropriate.</p>	C
Comment	<p>The Research, planning and nurseries departments are most involved with scientific research.</p> <p>Some examples of the internal research conducted: Tree breeding program - focussing on climate change and pest and disease tolerance. Focus on shortening breeding cycles.</p> <p>RMS system changes are done with the guidance of a R&D representative, playing a major role in approval.</p> <p>Some examples of supporting external research: Tree protection co-operative program (TPCP) working collaboratively - University of Pretoria. FMG consortium: Forestry Molecular Genetics - University of Pretoria Pesticide research work – NMMU. Fibre forecaster - University of Stellenbosch. FORSU - Forest Operations Systems Research - University of Stellenbosch. International Research Consortium - University of North Carolina (participants include: Africa, South America, America and Asia) BICEP - Biological Control - University of the sunshine coast (Australia) (South American Companies, Forestry South Africa).</p>	

1.3	Chain of Custody	C / NC
1.3.1	<p>A system is implemented to track and trace all products that are marketed as certified.</p>	C
Comment	<p>Sappi manage chain of custody and the marking of their product as per procedure: EC9A Labelling Timber – sampled timber was tracked during the audit as a verification exercise and could be tracked and traced.</p>	
1.3.2	<p>Information about all products sold is compiled and documented, including:</p> <ol style="list-style-type: none"> 1) Common and scientific species name, 2) Product name or description, 3) Volume (or quantity) of product, 4) Information to trace the material to compartment of origin for large scale operations or compartment FMU for small and medium scale operations. 	C



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	5) Logging or delivery date or period. 6) If basic processing activities take place in the forest, the date and volume produced, and 7) Whether or not the material was sold as certified.	
Comment	Procurement (Timber Control System (TCS)) displays information of Group, Sappi and Controlled wood with Incoming timber being managed as per contractual agreement. Barcode Labels (delivery notes) are used to retrieve the required information for identification and traceability.	

2. Engagement with stakeholders and the protection of cultural heritage

2.1	Tenure, access and use rights	C / NC
2.1.1	Legal tenure to manage and use resources within the scope of the certificate is demonstrated.	C
Comment	The title deeds/ water management database and the Plantation Manager (PM) contains up-to-date information of the number of leases and title deeds.	
2.1.2	Access and use by legitimate rights holders including indigenous people are understood and respected.	C
Comment	The rights are documented and/ or mapped with supporting evidence, as required.	

2.2	Measures to engage with stakeholders, settle grievances and resolve disputes.	C / NC
2.2.1	There is evidence of ongoing stakeholder engagement.	C
Comment	Current lists of stakeholders were verified during the audit. Interviews were conducted with managers and stakeholders and meeting minutes were reviewed. The interviews indicated that the forest managers and staff know their neighbours and other stakeholders and vice versa. It was also verified that managers know the influence each stakeholder or neighbour has on their plantation management and vice versa. Sappi's Stakeholder Relations Unit (SRU) is intricately involved in the ongoing engagement of stakeholders. Sappi holds community forum meetings with their surrounding communities on a regular basis. Sappi has an initiative called Abashintshi (a Zulu word for changers): Empowering communities to create their own wealth.	
2.2.2	Grievances/disputes are resolved using locally accepted mechanisms and/or institutions.	C
Comment	There are formal documented procedures for the following situations: <ul style="list-style-type: none"> • Disputes over access and use rights, • Tenure or rights of occupation, and • Requests for engaging in activities not permitted on the FMU. 	
2.2.3	There is a mutual understanding of the resource requirements and other needs within the community and these are met where possible.	C

Comment	<p>Examples of meeting these needs:</p> <ul style="list-style-type: none"> • Sappi Khulisa Umnotho is aimed at community tree-farming in KwaZulu-Natal and the Eastern Cape. In FY2017 under the programme 448 221 tons (2016: 395 232 tons) worth approximately ZAR 362 million was delivered to Sappi's operations. Since 1983 almost 10 000 farmers have benefited from Sappi Khulisa. Over 272 small and medium businesses have been established by community members generating more than 1100 jobs throughout the eight to ten-year growing cycle. 22 362ha - total area under this programme. • Abashintshi (Changers - in Zulu) Empowering communities to create their own wealth. Three aims of Abashintshi: <ul style="list-style-type: none"> ○ To decrease intentional fires, ○ Establish closer engagement with communities, and ○ Achieve social change • Sappi offers <u>financial advice and financial skills training</u> to their employees. Sappi contracted a third-party service provider to ensure that only valid Emolument Attachment Orders (EAOs) are deducted from employees who have had garnishee orders issued against them - from 2009 this has saved employees ZAR 800 586 (as per Sappi's 2017 Sustainability Report). 	
2.2.4	Indicators of community disharmony are noted, analysed and solutions are sought.	C
Comment	<p>Signs of disharmony related to forest management are detected and responded to. Meeting minutes are recorded as documented evidence.</p> <p>The Abashintshi enables an open communication with surrounding communities and play an active role during community forum meetings. There are 88 Abashintshi in 43 communities. 234 small businesses have either started up or have been rejuvenated ranging from: brickmaking projects, poultry and pig farms to crèches to home industries. In return Sappi's fires have declined by 89% since 2015, and more than 50% of the community participants indicated that they were very satisfied with their relationship with Sappi (As per their 2017 Sustainability Report).</p>	

2.3	The organization contributes to socio-economic development in the area where they operate.	C / NC
2.3.1	The organization contributes to employment and job creation.	C
Comment	Employment records are maintained on the total number of permanent and temporary (fixed-term) employees. Records are maintained on the total value of wages paid to permanent as well as temporary (fixed-term) employees. The number of jobs created on FMU's are stable or increasing, where declining it can be justified.	
2.3.2	The organization's employment policies are responsive to the local socio-economic context.	C
Comment	Sappi encourage contractors to employ from local communities, which is in line with their Human Resources (HR) Policies – Recruitment Operational Policy (SPOL/R8010 – Revision 1, dated 01 August 2018).	



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2.3.3	Demonstrable efforts to employ local workers and source local service providers.	C
Comment	The principles of Sappi's HR Policies are carried through to their recruitment procedure: EB1 Recruitment. Sappi has valid reasons in the case of sourcing from further afield.	
2.3.4	Opportunities for local social and economic development are identified through engagement with local communities and other relevant organizations.	C
Comment	<p>Sappi engages with the community and understand their needs. Meeting minutes are recorded as documented evidence of this engagement.</p> <p>Refer to the comments under 2.2.3 with regards to: Sappi Khulisa Umnotho and the financial advice and financial skills training Sappi offer.</p> <p>Further examples of Sappi's local social and economic development are:</p> <ul style="list-style-type: none"> • Local services are used as far as possible (maintenance, servicing of their radio systems, vehicle maintenance and chemical suppliers) • African Honey Bee (AHB) project: <ul style="list-style-type: none"> ○ This project improves cash flow - improved income from small-scale eucalyptus. ○ By not harvesting at four years, and waiting till seven years to harvest, small scale growers can increase their profit from ZAR 25 000 per year to ZAR 70 000 per year, resulting in an increase of 40% ○ 906 families registered from March 2016 to July 2017 <p>Area - Richards bay to Mozambique along the coast in KwaZulu-Natal (as per Sappi's 2017 Sustainability report).</p>	
2.4	Cultural, ecological, recreational, historical, aesthetic and spiritual sites and services are maintained.	C / NC
2.4.1	Sites of cultural, ecological, recreational, historical, aesthetic and spiritual significance are identified and protected. Access is granted to interested and affected parties.	C
Comment	<p>The Geographical Information System (GIS) has various layers which display these sites, as per their procedure: ER3D Managing Sites of Significance (version: 2.1, date: 26 July 2012).</p> <p>Sappi share their plantation trails and boost local economies. They established safe and enjoyable trail networks across their plantations which is particularly enjoyed by non-motorised trail users like mountain bikers, trail runners and hikers. This creates a win-win situation, in that risks like fire and illegal poaching are reduced by allowing users to enjoy the beauty of their land.</p> <p>Examples: economists and tourism experts have placed the value of recreational outdoor tourism to the Karkloof local economy at ZAR 234 million per year and Sappi has 6 declared nature reserves (as per Sappi's 2017 Sustainability Report)</p>	

3. Protection of workers and human rights

3.1	Compliance with National Labour legislation	C / NC
3.1.1	Forest owners and managers take responsibility for ensuring compliance with labour legislation.	C
Comment	Sappi monitors compliance with the Basic Conditions of Employment Act (75 of 1997) for their operations including those undertaken by contractors. Internal audits, conducted on an annual basis, are used as a monitoring mechanism. Employees of Sappi have employment agreements. Sappi has a contract agreement with their contractors, who are required to have letters of appointment with the personnel they employ during the period of their contract.	
3.1.2	Compliance with the legislation that promotes equal opportunity in the workplace.	C
Comment	There is no evidence of non-compliance with the Employment Equity Act (No 55 of 1998). Employment Equity (EE) Forums (which includes learning) constituting of employee representatives and management representatives ensure that steps are taken to promote equal opportunity in the workplace and eliminate unfair discrimination in any employment policies or practice. The recruitment policy of Sappi acts as documented evidence. Employees were interviewed during the audit, and compliance was verified.	
3.1.3	Workers are able to negotiate their conditions of employment through: collective bargaining with formal and informal workers organizations or in the absence of Union structures, workers are adequately informed of and consulted on matters that directly affect their working conditions.	C
Comment	Interviews were conducted with the following results: <ul style="list-style-type: none"> • Worker meetings are held on a continuous basis, • Workers have the choice to become unionised with the Chemical, Energy, Paper, Printing, Wood and Allies Workers Union (CEPPWAWU), and • Workers know the procedure of negotiating their conditions of employment 	
3.1.4	Wages comply with national legislation.	C
Comment	Pay slips and employment records were reviewed and found to be in compliance with national legislation.	
3.1.5	A dispute resolution process that is acceptable to all parties, is in place.	C
Comment	There is a common understanding between managers and workers regarding the steps to be taken in case of grievances or disputes. Interviews were held with workers and it was found that they are aware of what to do in the event of a grievance or dispute. Sappi has a documented dispute resolution process in line with their Policy of Grievance Handling (G2 – version 2, dated 2012).	
3.1.6	Workers grievances are responded to and are either resolved or are in the dispute resolution process.	C
Comment	Records are kept of worker's grievances related to worker's loss or damage of property, occupational diseases or injuries as required. HR is involved in the	



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	resolution process and follow the Policy of Grievance Handling (G2 – version 2, dated 2012).	
3.1.7	Fair compensation is provided to Workers for work-related loss or damage of property and occupational disease or injuries.	C
Comment	Sappi complies with the Compensation for Occupational Injuries and Diseases Act (No 130 of 1993) and is registered and make payments to the Workman's Compensation Fund. Being registered with Rand Mutual, Sappi is provided with their assistance with regards to the reporting of injuries to the compensation commissioner. During the audit it was verified that PAYE and UIF are up-to-date. The Disability Process (ED4 Occupational Health) and IOD Forms and Procedures (ED8) of Sappi are adhered to.	

3.2	Forest owners and managers take responsibility for ensuring compliance of all employees with legislated health and safety requirements and best practice	C / NC
3.2.1	Hazards to the health and safety of workers from forestry activities have been identified.	C
Comment	Hazard identification and risk assessment are documented and annually reviewed in the: Baseline Risk Assessment, Issue- and Continuous Risk Assessment that are conducted daily, Weekly meeting held to addresses risks, monthly report that include risk assessment. At the time of the audit some of the weekly risks were: mist, trip and fall, slippery roads and steep slopes.	
3.2.2	There are procedures for working safely.	C
Comment	Documented safe operating procedures are available for their hazardous operations. These procedures were available in English and Zulu at the audited activities. These procedures are also available on the Sappi system – RMS.	
3.2.3	Workers are aware of hazards in the workplace and are trained on safe work procedures in compliance with the national legislation.	C
Comment	Sappi complies with the Occupational Health and Safety Act (No 85 of 1993). During the audit, the following were found in compliance <ul style="list-style-type: none"> • Copies of Sappi's Health and Safety Policy are displayed, • Copies of Occupational Health and Safety Act are displayed, • At least one person per 50 employees have a valid first aid certificate. Sappi employs at least 1 first aider for every working team, even if their numbers are less than 50, • Legally required training (chainsaw operator certificates and driver licenses were verified), • A Health and Safety representative is appointed where there are more than 20 employees and thereafter 1 representative must be appointed for every 50 employees. Appointments are kept on file. Sappi employs at least 1 Health and Safety representative for every working team, even if their numbers are less than 20, • Where there are two or more representatives a committee is established, 	



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	<ul style="list-style-type: none"> • Health and Safety representatives conduct inspections of their workplaces prior to every Health and Safety meeting, using a checklist, • Employees and contracted workers are trained on safety procedures, • Safety talks are conducted when necessary, records are kept on file. During the audit safety induction talks were given at activities and participants, including the audit team, were required to sign in, as a means of recording that the safety talks were conducted, and • Workers have personal protective equipment appropriate to their assigned tasks. <p>In addition: Sappi has a Safety Application on a cell-phone interface that plays an active role in their commitment to providing a Healthy and Safe working environment. This application is used in field (on an as-needed basis) to request additional safety assistance and to respond in case of incidents, ranging from guidance to extracting a person from a compartment to a medical facility – depending on the nature of the incident.</p>	
3.2.4	Safe work procedures are carried out in the work place.	C
Comment	<p>Workers were observed during the audit and it was found that the safe work procedures are implemented, and workers adhere to these procedures. Documented safe working procedures included:</p> <ul style="list-style-type: none"> • Adequate supervision to ensure that work is conducted safely, • A trained first aider on site at their hazardous operations, • First aid kits and fire fighting equipment are available and accessible, • The system to restock first aid boxes, • Protective clothing is worn and, in a condition, to protect the worker against injuries (as intended), and • Specific safe work procedures for each task. 	
3.2.5	Workers have personal protective equipment (PPE) appropriate to their assigned tasks.	C
Comment	Where risk assessments identify the need, PPE is used by workers on the relevant tasks. Evidence of PPE being issued to and correctly used by workers was verified.	
3.2.6	Past incidents are recorded, trends examined and safety practices adjusted to avoid recurrence.	NC
Comment	<p>Minor non-conformance: At the time of the audit there were past incidents recorded at farm level (in field) but not on the Sappi system (incidents dated: 17/02/2018, 06/08/2018 and 07/08/2018). For these incidents trends could not be examined nor could safety practices be adjusted to avoid recurrence. This non-conformance was only noted at one of the sites sampled during the audit.</p>	
3.2.7	Quality and condition of worker accommodation and associated services.	C
Comment	Housing constructed for workers by landowners were inspected during the audit and found to be in conformance with the requirements stipulated in Appendix 2: Housing Standards of SAFAS 4:2018.	



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3.3	Contribution to skills development in the work force.	C / NC
3.3.1	All workers have had relevant job specific training and where required or appropriate, hold the necessary skills certificates.	C
Comment	<p>Training records match training requirements. These records include, among other:</p> <ul style="list-style-type: none"> • training schedules that indicate when re-fresh training is required, and • training matrix. <p>Legally required machine or vehicle licenses, certification of first aiders and chainsaw operators were sampled and found in order.</p> <p>According to the 2017 Sustainability Report of Sappi, an average of 42 training hours are provided per employee at an average expense of ZAR 6 500 in FY2017.</p>	
3.3.2	Workers are supervised to ensure they implement their tasks safely and effectively.	C
Comment	The observed work areas were found to be in conformance. Interviews were conducted with supervisors and workers.	

4. Protection of soil, carbon and water

4.1	Maintenance of the productivity and carbon storage potential of soils and minimisation of impacts on water resources.	C / NC
4.1.1	Soil erosion is minimised through the use of harvesting and silviculture systems which are appropriate to the slope, soil sensitivity and weather.	C
Comment	During the audit manual and mechanised operations and harvested sites were observed. It was evident that Sappi maintains a good broadcasting practice. Sappi adheres to their documented operational guidelines.	
4.1.2	Soil is protected through responsible residue management.	C
Comment	<p>Post-harvested sites were inspected and found to be in conformance.</p> <p>A combination of mulching and burning is used - depending on the slope, soil sensitivity and weather.</p> <p>Examples of documented procedures:</p> <ul style="list-style-type: none"> • EO1doc001 Pre-harvesting agreement: in which the terrain is classified, and • ES2B121 Obtaining approval to burn slash. 	
4.1.3	Development, maintenance and use of infrastructure, as well as transport activities, are managed to protect environmental values and withstand the impacts of flooding.	C
Comment	<p>Road networks were inspected and found to be well compacted and allow proper drainage. Road management plans were reviewed and found in order.</p> <p>Roads maintenance includes among other: pre-harvest grading, maintenance (during harvesting) and post-harvest grading.</p>	
4.1.4	Eroded areas are rehabilitated, and interventions monitored and adapted to ensure effectiveness and steps are taken to prevent soil erosion.	C
Comment	Field inspections were conducted, and it was verified that the measures taken are effective. Good broadcasting was observed, and the utilisation of cool burns were evident.	



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4.2	Prevention of negative impacts to water resources.	C / NC
4.2.1	Wetlands and riparian areas are identified, delineated and protected from forestry impacts by adequate buffers of appropriate vegetation guided by the best available information.	C
Comment	Field inspections of wetlands and riparian areas were conducted, and it was verified that Sappi adhere to their Delineation procedure. Sappi has wetland and riparian delineation plans (using the DWS delineation guidelines) in place, thereby ensuring delineation is done at re-establishment. Maps show wetlands and riparian areas as well as their prioritisation for clearing and maintenance.	
4.2.2	Wetlands, riparian habitats and their buffers are managed for maintenance or enhancement of ecosystem health and connectivity.	C
Comment	Compartments containing restored wetlands and riparian areas were inspected and restoration activities were found to be effective.	
4.2.3	Safeguards to protect wetlands and riparian habitats from the impacts of forestry activities are implemented.	C
Comment	Forestry activities that may have an impact on freshwater ecosystems is included under the relevant criteria in this report. Refer to 6.2.8, 6.2.3, 6.3, 4.1.3, 6.2.3, 4.1.2, 6.2.2, and 4.1.1. During the audit conformance to these requirements were verified, except for 6.2.2.	

4.3	Maintenance of carbon sequestration and storage potential.	C / NC
4.3.1	Annual harvest does not exceed the annual increment, or where this is exceeded it is justified and a plan of how any over-cutting is to be compensated for in future, is prepared.	C
Comment	The Annual Plan of Operation (APO) is used as an annual felling plan. The APO is based on the 3-year tactical plan.	
4.3.2	The growing stock (standing volume) of the FMU is maintained or increased over consecutive rotations, or where this is not achieved justification can be provided.	C
Comment	Sappi compares records of past tonnages and their growing stock of is maintained or increase over consecutive rotations, or where this is not achieved justification can be provided.	
4.3.3	Protection of natural habitats to maintain ecosystem functioning for the delivery of ecosystem services.	C
Comment	The following indicators were found to be in conformance: 4.2.1, 4.2.2, 4.2.3 and 5.3.1 to 5.3.9 (refer to their respective comments within this report).	
4.3.4	Steps taken to improve soil carbon stocks.	C
Comment	Refer to the following indicators and their comments in this report: 4.1.2, 4.1.1, 4.2.2 and 4.2.3. Sappi conforms to these requirements.	



5. Conservation of biodiversity and ecological integrity

5.1	Prevention of adverse off-site impacts arising from forestry operations.	C / NC
5.1.1	Operations are planned and managed to prevent adverse off-site environmental impacts, including impacts to neighbouring communities and other stakeholders.	C
Comment	Sappi has assessed the risks of its management activities on the environment and stakeholders. Planning and management includes measures to prevent adverse off-site environmental impacts.	

5.2	Prevention or mitigation of forestry impacts.	C / NC
5.2.1	The organization has determined if the species they intend to grow or are growing are known to be invasive, and if so have appraised the landscape for signs that these may be a source of invasion.	C
Comment	Managers undertake visual assessments to determine if the plantations are a source of invasion in the landscape and the results of these assessments are documented.	
5.2.2	Where 5.2.1 is relevant then the organization is taking steps towards reducing the invasiveness of their plantations.	C
Comment	Sappi has documented evidence of the steps taken, which was verified during the in-field inspections.	
5.2.3	Where the FMU is a source of invasion then the organization is part of a cooperative and strategic approach with other land users and organizations to eradicate invasive plantation species from the landscape beyond the FMU.	C
Comment	Sappi has documented evidence of their strategic cooperative approach.	
5.2.4	Genetically modified organisms (GMOs) are not used commercially.	C
Comment	It was verified that GMO's are not commercially used.	
5.2.5	Where fertilizers are used, they shall be applied according to accepted industry protocols with due consideration for the environment.	C
Comment	Records of application were reviewed and their conformance to procedures were verified.	
5.2.6	Damage to conservation zones should be avoided during harvesting. When damage occurs, it must be repaired.	C
Comment	Field inspections of current and previous years harvesting sites were conducted and found in conformance. Harvesting plans were examined for identification of conservation zones and measures are taken to prevent damage, these plans were found to be in conformance.	

5.3	Protection of natural habitats and biodiversity.	C / NC
5.3.1	Best Available Information is used to identify native ecosystems.	C
Comment	The vegetation of native ecosystems occurring on the FMU are mapped according to the national vegetation types. According to Sappi's 2017 Sustainability Report, Sappi has 6 declared nature reserves.	

5.3.2	At least 10% of the certified area is comprised of representative sample areas of native ecosystems which are prioritized according to conservation value and protected.	C
Comment	Representative ecosystems are mapped and designated as conservation zones. Sappi follows their systematic conservation planning (Important Conservation Area – ICA management plan) and condition of the vegetation as key information sources for prioritising the conservation value of these zones. During the audit conservation zones inspected ranged from: Midlands mist belt grasslands to rivers (for example: The Lion’s river and Hlelo river).	
5.3.3	The presence or likely presence of listed threatened or protected, species and their habitats occurring within and adjacent to the FMU is assessed using the best available information.	C
Comment	The vegetation unit, its conservation status and listed threatened or protected species likely to occur, are known and recorded on the unplanted areas on the plantation estate. If priority species have been found, their presence is recorded – Sappi has a species guide categorising the species fauna and flora as: critically endangered, endangered, vulnerable, rare, near threatened and not threatened. Regions where these species are likely to occur is also illustrated in the Species Guide. Sappi can demonstrate that this assessment is in accordance with 5.3.2.	
5.3.4	Priority species are being managed and monitored according to best available information.	C
Comment	Sappi has documented evidence of collaboration with species protection programmes with respect to monitoring and management of priority species. Examples of management and monitoring of priority species, verified during the audit included among other: Karkloof Blue Butterfly, Mist Belt Chirping Frog and Blue Swallow.	
5.3.5	A fire management plan for natural ecosystems guided by the best available information is implemented.	C
Comment	Sappi has a fire management plan, specific with respect to the burning of wetlands, grasslands, fynbos and the protection of natural forest. Fire management plans for conservation zones (identified as Important Conservation Areas – ICA) are documented in Sappi’s Fire Risk Management System (FRMS) and have accompanying maps indicating among other fuel load and a shared view with fire protection area. In-field inspections were conducted, and the implementation of Sappi’s fire management plan was verified.	
5.3.6	A programme to control and eradicate listed invasive species is implemented	C
Comment	The Integrated Weeding Plan is the documented alien and invasive species control plan and contains the elements described in the guidance of 5.3.6 of SAFAS 4:2018. During in-field inspections the effectiveness of their control plan was verified.	
5.3.7	Grazing by livestock and wildlife populations shall be managed to prevent degradation of the natural habitat.	C



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Comment	During in-field inspections there were no signs of overgrazing, such as soil erosion and proliferation of indicator species such as <i>Aristida junciformis</i> . Wetlands and watercourses were inspected and there were no signs of excessive trampling by livestock which could lead to erosion. Sappi has a documented grazing plan and is implemented by means of grazing permits.	
5.3.8	Measures are taken to manage and control hunting, fishing, trapping and collecting.	C
Comment	Sappi has a strict policy of no hunting, fishing, trapping or collecting (this policy was the result of various risk assessments). Their employees and security are aware of this policy and on the lookout for any indication of these activities.	
5.3.9	Plantations established on land converted from natural forests after 1972 will not be eligible for certification. Conversion of plantations to other types of land use, shall not occur unless in justified circumstances where the conversion: a) is in compliance with national and regional policy and legislation relevant for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with materially and directly interested persons and organisations, and b) entails less than 10 % of a landscape, c) does not have negative impacts on threatened (including vulnerable, rare or endangered) ecosystems, culturally and socially significant areas, important habitats of threatened species or other protected areas, and d) makes a contribution to long-term conservation, economic, and social benefits.	C
Comment	During the audit it was found that Sappi has no plantation established on land from natural forests after 1972.	

6. Forest health and protection

6.1	Protection from illegal activities.	C / NC
6.1.1	Measures are implemented to provide protection from timber theft, illegal hunting, fishing, trapping, collecting, settlement and other unauthorized activities.	C
Comment	Sappi has a strict policy of no timber theft, illegal hunting, fishing, trapping, collecting, settlement and other unauthorised activities (this policy was the result of various risk assessments). Their employees and security are aware of this policy and on the lookout for any indication of these activities. Where needed access control is in place. Where FMU's are on leased land there are agreements between parties on how to control unauthorised or illegal activities.	

6.2	Responsible use of chemicals and biocontrol agents.	C / NC
6.2.1	Storage of hazardous materials and chemicals (including all fuels, pesticides, herbicides and fertilisers) is in accordance with legislation and best practice.	C



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Comment	Chemical stores and field sites were inspected, and the following were found in conformance: <ul style="list-style-type: none"> • Emergency procedures, • PPE requirements, • Measures for prevention, containment or mitigation of spillages, • Evidence of training of workers, and • Material Safety Data Sheets for all chemicals Fuel stores are managed according to legal requirements.	
6.2.2	Waste disposal sites on the FMU comply with national legislation and local by-laws and are managed according to industry best practice guidelines. Hazardous waste is only disposed of at sites registered for the disposal of hazardous waste.	NC
Comment	Minor non-conformance: At the time of the audit it was witnessed that a waste disposal site on an FMU was not managed according to industry best practice guidelines in that hazardous waste (chemical containers) was not safely disposed of.	
6.2.3	Measures shall be taken to prevent chemical and hydrocarbon pollution and remediate areas in the event of spillage.	C
Comment	Documented procedures are in place to avoid fuel and oil pollution and remediate significant spillages. Spillages are classified as: <ul style="list-style-type: none"> • Minor – in which biodegradable compound is used and • Major – polluted soil is removed and rehabilitated as per procedure. Workshops, fuel stores, sites where vehicles, fuels and oils are being used were inspected and found in conformance.	
6.2.4	Integrated pest management, including silvicultural systems, lead to more efficient use of chemicals.	C
Comment	Sappi has documented integrated pest management programmes and evidence of its implementation was verified during in-field inspections where trees were sprayed as a measure to control pests like cut worm.	
6.2.5	The following groups of pesticides are prohibited: <ol style="list-style-type: none"> WHO Type 1A and 1B pesticides and other highly toxic pesticides, Chlorinated hydrocarbons whose derivatives remain biologically active and accumulate in the food chain beyond their intended use. Pesticides banned by international agreement Note: “pesticides banned by international agreements” are defined in the Stockholm Convention on Persistent Organic Pollutants 2001, as amended.	C
Comment	Chemical stores and records of the type of chemical used were inspected and found in conformance.	
6.2.6	The use of pesticides shall follow the instructions given by the pesticide producer and be implemented with proper equipment and training.	C
Comment	In-field sites where chemicals are being applied were inspected and found in conformance. It was verified that contractors that spray chemicals have at least one registered Pest Control Operator (certificates were reviewed and found in order and valid).	
6.2.7	The use of biological control agents is in accordance with legislation and with internationally accepted scientific protocols.	C



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Comment	At the time of the audit there were no biological control agents used. Sappi works in accordance with legislation and internationally accepted scientific protocols should they use biological control agents. Examples of conformity: <ul style="list-style-type: none"> • Sappi's cooperate with the Plant Protection Research Institute (PPRI) - on a national level (weed bio control), and • The Tree Protection Cooperative Program (University of Pretoria - UP and the FABI - Forestry And Biotechnology Institute) (pests bio control) 	
6.2.8	Where fertilisers are used, they shall be applied in a controlled manner and with due consideration for the environment.	C
Comment	The use of fertilisers is in accordance to accepted industry protocols. Procedures and records of application were examined for in-field activities for example planting of trees and at Sappi's nurseries.	

6.3	Protection of forests from negative impacts of fire.	C / NC
6.3.1	Records of past uncontrolled fires are kept, and trends examined.	C
Comment	Sappi documents records of past fires which include: number of fires, extent of damage, examination of causes and analysis of trends.	
6.3.2	There is a comprehensive fire risk management strategy that is implemented.	C
Comment	The fire risk plan is documented, Sappi's Fire Data Combined Log was reviewed and found in conformance.	
6.3.3	Those responsible for implementing the fire management strategy are capable.	C
Comment	Records of formal fire protection training were reviewed and found in order and valid.	
6.3.4	The organization is a member of the Fire Protection Association in all areas that the FMU occupies.	C
Comment	Sappi is a Pool A member of the Fire Protection Association giving them the benefit of first call rights. It was verified that some Sappi employees sit on executive committees. During the audit a fire detection centre, airplane strips and bombers were visited and found to be extremely responsive. During in-field visits it was evident that Sappi's employees are updated throughout the day of the fire risk rating. Preventive measures were observed to be in place: during the rise of the fire risk rating, fire fighter units were deployed to the designated stations posing the greatest fire risks.	
6.3.5	Measures shall be taken to limit environmental damage after the occurrence of uncontrolled fires.	C
Comment	Sappi has documented procedures that cover rehabilitation after damage from uncontrolled fires. Evidence of implementation and monitoring was verified during the audit.	

6.4	Monitoring, identification and control of pests and diseases and damage causing animals.	C / NC
6.4.1	Managers inspect plantations for evidence of ill-health and damage and take	C



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	appropriate action. The frequency of inspections shall be determined by the specific pests and environmental factors.	
Comment	Maps and records of occurrence of pests and diseases were reviewed and found in conformance. This forms part of Sappi's Integrated Pest Management Strategy and managers are supported by the Tree Protection Co-operative Programme (TPCP).	
6.4.2	New outbreaks and spread of specified pests and disease are reported to the relevant authority or organization.	C
Comment	Significant pest incidents are monitored with frequency that is linked to the specific pest and environmental factors and reported to the TPCP. Sappi uses their Pests and Diseases Log as a tool for the recording and reporting of these incidents.	
6.4.3	Where damage-causing animals (e.g. baboons, bush pigs, antelope & rodents) pose a significant threat to the productivity of the plantation, they are controlled according to recommended protocols and in line with legislation.	C
Comment	The sites audited do not really experience a problem with regards to fixed damage-causing animals. Sappi has mechanisms in place to assess the damage that has taken place and can show the affected productivity which is in line with their policy and procedures.	

7. Economic sustainability

7.1	Sustainable use of non-timber forest products.	C / NC
7.1.1	For commercial use of non-timber forest products from natural areas under the organization's control, a sustainable harvest level is calculated and adhered to. Sustainable harvest levels are based on Best Available Information.	C
Comment	Sappi calculates the sustainable harvest levels of non-timber forest products and they were found to be in compliance to the requirements of the National Environmental Management Biodiversity Act (No 10 of 2004) and Threatened or Protected Species Regulations (2013). Examples of Sappi's non-timber forest products: <ul style="list-style-type: none"> • Honey – as per their African Honey Bee (AHB) project (refer to the comment under 2.3.4 in this report), • Thatching grass, • Mushrooms, and • Eucalyptus oil. 	
7.1.2	The range of resources and ecosystem services on the FMU and the potential benefits to local communities are known by management.	C
Comment	Managers are able to describe the range of: <ul style="list-style-type: none"> • Plantation products and how this could benefit local communities • Ecosystem services and how these could benefit local communities Sappi has documented evidence of the above. According to Sappi's analysis of ecosystem service supply and demand (September 2012):	



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	<ul style="list-style-type: none"> • Downstream roles supplied by Sappi estates, among other: <ul style="list-style-type: none"> ○ Water supply, ○ Soil stability, ○ Water quality management, ○ Water storage, and ○ Refuge or nursery of wild plants and animals. • The national and provincial roles supplied by their estates include, among other: <ul style="list-style-type: none"> ○ Carbon storage, ○ Energy, ○ Natural heritage/ biodiversity conservation, ○ Industrial wood, and ○ Sense of place. 	
7.1.3	The organization diversifies the range of products and services produced on the FMU where this is beneficial to the sustainability of the operation and the community.	C
Comment	<p>Planted land comprises 58% hardwood and 42% softwood, equating to 27.8 million tons of standing timber (as per Sappi's 2017 Sustainability Report)</p> <p>The range of products and services that are available are being used where there are opportunities. Evidence of how opportunities are made known to communities was verified.</p> <p>The range of Sappi's products include, among other:</p> <ul style="list-style-type: none"> • Pulp, • Sawn timber, • Charcoal producers (once permitted can collect non-utilised timber), and • Bio-fuel. 	

7.2	Forestry operations are economically sustainable.	C / NC
7.2.1	Harvested timber areas are re-established within a year of felling unless the area is being rehabilitated to natural vegetation for ecological reasons.	C
Comment	Field inspections of re-established areas and areas not re-established were conducted and found to be in conformance. Harvesting and planting records indicate conformance	
7.2.2	There is a clear justification for the choice of species and genotypes chosen for the plantation, which takes into account the objectives of the plantation, and the climate, geology and soils at the planting sites.	C
Comment	It was verified that Sappi uses their 3-year tactical plan and their Research department is the driving force with regards to the choice of species. It was evident that the key factors governing species choice have been considered.	
7.2.3	Aspects important to plantation productivity are monitored.	C
Comment	<p>Sappi has documented monitoring results as required by the guide under 7.2.3. of SAFAS 4:2018.</p> <p>The following procedures play a major role in the monitoring of Sappi's plantation productivity:</p>	



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	<ul style="list-style-type: none"> Measuring and recording silviculture performance (ES4), Measuring and recording operational gain (ES4A), and Silviculture operation gain record (ES4doc007) <p>Documented information is available on their Timber Control System (TCS).</p>	
7.2.4	Where there is evidence of a loss of productivity over successive rotations that can be attributed to reduction in site quality action is taken to restore site quality.	C
Comment	<p>Growth data is available and indicates production values and actions are taken accordingly.</p> <p>A preventive approach is followed with regards to factors that can lead to a reduction in site quality for example fire and biomass removal (erosion)</p> <p>Site specific risk-based approach is followed to address changes in site quality.</p> <p>Monitoring include:</p> <ul style="list-style-type: none"> Annual reports are compiled comparing the actual- and planned tonnage If the actual is below planned for consecutive years (more than 10%), appropriate action is taken. Permanent sample plots (PSP) are measured annually and yields a controlled value to measure against. 	
7.2.5	The drivers of the costs of production must be understood and relevant aspects.	C
Comment	<p>As per Sappi's 2017 Sustainability Report, they exceeded their 2020 Prosperity goal to realise an EBITDA (earnings before interest, taxation, depreciation and amortisation) to be equal or greater than 20% - achieving 25.1%.</p> <p>It is evident that Sappi's management plan budgets are in conformance.</p>	
7.2.6	Forestry operations make an economic contribution to the community and country.	C
Comment	<p>The value of Sappi's annual operations is stable or increasing, or where declining can be justified. Throughout the audit their contribution to the community and country was evident.</p> <p>According to Sappi's 2017 Sustainability Report, Sappi was recognised as:</p> <ul style="list-style-type: none"> Large Exporter of the year, and as Manufacturer of the year. <p>During the 2017 KZN Exporter of the year awards hosted by the Durban Chamber of Commerce and Industry.</p>	
7.2.7	Forestry operations make provision for diversification and resilience.	C
Comment	Forestry operations produce a range of products/ customers to diversify income streams. A range of species and clones and age classes were witnessed throughout the audit. Refer to the comment under 7.1.3 in this report.	
7.2.8	Responsibilities for sustainable forest management are clearly defined and assigned.	C
Comment	Organograms and job descriptions were reviewed and found to be in conformance.	



8. STAGE 2 AUDIT DATA

8.1 Serial Numbers of Non- Conformities

Major Non-Conformities: None

Minor Non-Conformities: Two (JFP01 and JFP02)

Observations: None

8.2 Client Representatives:

Attendance registers were completed by all the participants throughout the audit

9. AUDIT PLAN AND SCHEDULE

9.1 Any process on the audit schedule not covered:

The audit covered all processes applied for

9.2 Any amendments to the 5-year plan

Sappi Southern Africa is still in the evaluation process, there are therefore currently no amendments to the 5-year plan.

10. UNRESOLVED DIVERGING OPINIONS:

There were no unresolved diverging opinions.

11. CORRECTIVE ACTION:

11.1 Verification of corrective actions on non-conformities identified during the previous audit:

There were no non-conformities identified during previous audits. The stage 2 audit identified the client's first non-conformities.

11.2 Corrective action required on non-conformities identified during this audit, including time limits:

Action plan required	Yes*	Date required	03/10/2018*
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*Only minor non-conformities were identified during the audit, therefore should evidence of corrective action taken be submitted before 03/10/2018 an action plan will not be required

Note: All non-conformities need to be effectively cleared before Sappi's client file can be submitted to the Certification Committee for review and the certification decision be made.

12. Significant changes, if any, that affect the management system of Sappi since the last audit took place:

There were no significant changes from the stage 1 audit.

13. AUDIT CYCLE ANALYSIS:

13.1 Non-conformity analysis (5-year cycle)

Sappi Southern Africa is still in the initial evaluation process, thus rendering this point not-applicable.

13.2 The audited client is effectively controlling the use of the certification documents and marks, if applicable:

Sappi Southern Africa is still in the initial evaluation process, thus rendering this point not-applicable.

13.3 The conformity and effectiveness of the management system and the summary of evidence

i) The capability of the management system to meet applicable requirements and the expected outcomes

Non-conformity
Non-conformances (JFP01 and JFP02) were raised.
Effective
The Forest Management System of Sappi shows evidence of their ability to address the non-conformities effectively.

ii) The internal audit process

Conformity
No non-conformance was raised against their internal auditing
Effective
The Forest Management System of Sappi shows evidence of an effective internal auditing process.

iii) The management review process

Conformity
No non-conformance was raised against their management review process
Effective
The Forest Management System of Sappi shows evidence of an effective management review process.

13.4 Summary of review of performance of the Management System over 5-year period.

Sappi Southern Africa is still in the initial evaluation process, thus rendering this point not-applicable.

14. CONCLUSION:

14.1 Conclusion on the appropriateness of the certification scope

The scope is appropriate for certification of their forest management system

14.2 Confirmation that the audit objectives have been met

All audit objectives have been met

14.3 Effectiveness of the management system over the 5-year certification cycle

Sappi Southern Africa is still in the initial evaluation process, thus rendering this point to be reviewed during the certification cycle, should they be granted certification.

Their management system has been effectively integrated within the company and its processes.

14.4 Demonstrated commitment to maintain the effectiveness and improvement of the management system.

Sappi Southern Africa’s management team demonstrate commitment towards the improvement of the management system. The participation of representatives of various levels within the organisation was evident throughout the audit.

14.5 Effectiveness of the management system’s contribution to the achievement of the organisations policy and objectives

Apart from the non-conformities, the management system has been integrated within the management structure of the company. This integration of the management system into allows Sappi to achieve their defined policies and objectives.

14.6 Recommendation

Sappi Southern Africa does not fully conform with the requirements of SAFAS 4:2018.

Upon the effective closure of the non-conformities, as noted within the report and non-conformity reports, Sappi Southern Africa will fully conform with the requirements of SAFAS 4:2018 and be recommended for certification.

Full Compliance	-	Open with corrective actions	X	Suspension Recommendation	-
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