

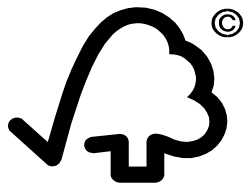
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SmartWood

Practical conservation through certified forestry

Forest Management **2007 Annual audit** Report for:

ITC Limited

Albany, Western Australia

Certificate Code: SW-FM/CoC-1217

Audit Dates: 3-5 May 2007
Report Finalized: 31 August 2007
Auditors: John Tredinnick

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1. AUDIT PROCESS

1.1. Auditors and qualifications:

John Tredinnick

John Tredinnick is a Principal Consultant with URS Forestry based in Perth, Western Australia. He has a Bachelors Degree in Forest Science and a Masters Degree in Science, including specific studies in natural resource economics. John also has some 20 years experience working with the forest industry in Australia and overseas. This experience has included management positions involved with native forestry, plantation development, farm forestry, processing, timber trading and corporate finance. John joined URS in January 2000 and currently manages the Australian operations of URS Forestry as well as being involved with a number of forestry projects. John completed Lead Assessor Training by SmartWood in June 2002 and has previously been involved with several FSC Forest Management audits and scoping assessments.

1.2. Audit schedule

Date	Location /main sites	Main activities
April 4 2007	Esperance, ITC office	Review of outstanding CARS. Audit against Principle 5.
April 5 2007	Esperance properties. ITC Office.	Visit ITC properties in Esperance. Audit against Principle 8.
April 6 2007	Esperance, ITC office	Audit against Principle 9. Discussion of findings and de-briefing
Total number of person days used for the audit: 6 = number of auditors participating 1 times total number of days spent for the audit 6		

1.3. Sampling methodology:

The primary objective of the SmartWood annual audit is to verify that Corrective Action Requests (CARs) required as a result of an assessment or subsequent audit of Integrated Tree Cropping (ITC) are being met and that their forest management practices continue to be in conformance with the FSC Principles and Criteria (P&C). ITC has been FSC certified since 2003 and this is their third annual audit.

ITC have three certified forest management units (FMU) in their operations: Bunbury/Albany (Western Australia), Esperance (Western Australia), and the Green Triangle region of Victoria and South Australia. This audit focused on the Esperance FMUs. Within Esperance the auditor selected sites that represented the spectrum of plantation management activities and social and environmental

issues needed for a thorough evaluation of compliance with selected FSC Principles and Criteria (Principles 5, 8 and 9) as well as compliance with the CARs of the previous certification audit. Attention was also given to sites that had current operational activities, such as recent establishment. Though audit sites were generally pre-selected by the auditor, several sites were randomly chosen for review while traveling through the FMUs.

FMU or Site audited	Rationale for selection	Group FMU belongs to and number of FMUs in the group
ITC forest properties in Esperance	<ul style="list-style-type: none"> • Post planting activities, such as replanting and spraying. • Wetland monitoring procedures • Simazine buffers • Impacts of groundwater on growth • Revegetation projects • Weed competition • Plantation productivity 	Esperance FMU

1.4. Stakeholder consultation process

The audit was undertaken during a period when the Esperance community was focused on a threat to community health and the environment caused by the dispersement of lead from transport and storage operations. While the cause of this threat was not related to ITC, there was a heightened sense of concern within the community concerning industrial operations, and particularly those that involved port facilities. Plans to initiate stakeholder engagement related to future harvesting and export operations were deferred by ITC as a result of this issue.

The auditor agreed with the company that it was not in the best interests of ITC to bring forestry issues to the fore by consulting widely with the community at the time of the field visit. Consultation was therefore undertaken via a stakeholder survey that was sent to relevant stakeholders during the audit implementation.

Stakeholder type	Number of stakeholders informed	Number of stakeholders consulted or providing input
ENGO	30	1
Social/ Community	47	2

1.5. Changes to Standards (if applicable)

The standard used was *“Rainforest Alliance/ SmartWood Interim Standards for Assessing Forest Management in Australia (November 2006)”*

Changes have been made to the standard since the last evaluation.

2. AUDIT FINDINGS AND RESULTS

2.1. Changes in the forest management of the FMO

As the audit has been undertaken prior to the start of planting activity in 2007, there have been only minor changes to the forest management area since the previous audit. These changes result from the harvesting of plantations and from final mapping of areas planted in 2006.

Planning has begun for the export of hardwood woodchips from the Esperance and Green Triangle regions during 2008. An area of 2 hectares has now been secured for stockpiling and loading at the Esperance Port. In the Green Triangle region, agreement has been reached between a number of growers and the Port of Portland regarding broad responsibilities for the development of port infrastructure. In both regions ITC will use in field chipping processes that are similar to those currently operating in the Albany region.

Tony Price, General Manager of ITC Forestry, has resigned and his position has been replaced within the company by Carl Richardson. Emily Silberberg is expected to be on maternity leave until the end of 2007 and FSC responsibilities will be filled by Gordon Robson, Manager Forest Planning.

ITC proposes to extend the current FSC certificate to properties in Queensland; however the company is waiting for some more permanent resolution of issues associated with the use of Simazine before it confirms this decision.

New (2007) establishment areas to be included in ITC FSC certified area (ha)

	South West WA	Esperance
Estimated area to be planted in 2006	659	1,380
Other (includes native vegetation, wetlands, rock, cleared agricultural land etc)	517	919

Area to be taken out of ITC FSC certified area (ha)

	South West WA	Green Triangle
Planted Area	3,843	290
Other (includes native vegetation, wetlands, rock, cleared agricultural land etc)	454	Nil

Total ITC area for 2007 FSC Audit

	South West WA	Esperance	Green Triangle	Total
Planted Area	45,500	41,387	30,753	117,640
Other (includes native vegetation, wetlands, rock, cleared agricultural land etc)	11,885	12,597	2,970	27,452

2.2. Stakeholder issues

No significant issues were raised by stakeholders as part of this audit. There were no observed disputes between local communities, workers, neighbors or farmers and the company. Moreover, SmartWood received no complaints or comments from stakeholders concerning ITC's forest management practices over the past year.

There are a number of issues (e.g. roading, harvesting operations, spraying) associated with the plantation industry as a whole that are causing some concern in the communities where ITC operates. Stakeholders advise that ITC is one of the more proactive managers in the region as far as managing these issues.

2.3. Compliance with applicable corrective actions

The section below describes the activities of the certificate holder to address each applicable corrective action issued during previous evaluations. For each CAR a finding is presented along with a description of its current status using the following categories. Failure to meet CARs will result in noncompliances being upgraded from minor to major noncompliances with compliance required within 3 months or face

suspension or termination of the SmartWood certificate. The following classification is used to indicate the status of the CAR:

CAR Status Categories	Explanation
Closed	Certified operation has successfully met the CAR and addressed the underlying noncompliance.
Open	Certified operation has <u>not met</u> the CAR; underlying noncompliance is still present. CAR becomes a Major CAR with a 3 month deadline for compliance

Condition #10-2004:	Reference Standard #: 4.4
Non-compliance: Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	ITC has not yet developed social performance indicators relevant to its business objectives and operations or established a process or reported publicly on its social objectives and performance.
Corrective Action Request: ITC shall develop social performance indicators relevant to its business objectives and operations and report publicly on its social objectives and performance.	
Timeline for Compliance: Three months from receipt of the final Annual Audit report.	

<p>Audit findings:</p> <p>ITC has developed a <i>Social Responsibility Policy</i> that outlines corporate objectives relating to communication, complaints, sponsorship, indigenous relations, training, equal opportunity, community enhancement, and public reporting.</p> <p>The company has also produced a <i>Social Responsibility Performance Report</i> in which it defines and reports on social performance indicators for the 2006 calendar year. The report is available on the company's website and provides a critical assessment of areas where the company has met its objectives and those areas where it needs to improve.</p> <p>The <i>Social Responsibility Performance Report</i> provides a very good starting point in the process of identifying the factors that are important to ITC in terms of social responsibility and how the company is performing against its own criteria. The report is generally consistent with the policy, but it is noted that some aspects of the policy (eg training and equal opportunity) are not addressed within the report.</p>	
Status: Closed	
Follow-up Action (if applicable): See Observation 01/07	

Condition #22-2004:	Reference Standard #: 8.2
Non-compliance: Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	The <i>High Conservation Value Forest and Biodiversity Management Strategy</i> addresses the need to identify areas that are impact by dieback and to classify wetlands, but it does not contain any details of the monitoring processes that have been put in place.
Corrective Action Request:	

ITC shall develop and start to implement plans for the on-site and off-site monitoring of its operations on:

- spread of dieback;
- wetlands (including pollution and drawdown) and wetland dependent communities; and
- groundwater and groundwater dependent communities.

Timeline for Compliance: Three months from receipt of the final Annual Audit report

Audit findings:

The *High Conservation Value Forest and Biodiversity Management Strategy* has been modified to incorporate the monitoring of dieback and other plant diseases through a *Remnant Vegetation Condition Index Survey*. The Condition Index is surveyed every three years within strata that represent *Biodiversity Management Units* within each property. Dieback is considered as one component of an overall Condition Index and the incorporation of dieback monitoring into broader assessment procedures is considered appropriate. The process should provide ITC with the information necessary to monitor and manage the spread of the pathogen. Training in the identification and management of dieback is not currently listed as essential training for staff.

At the time of the audit, Condition Index surveys had not been completed. However, independent flora surveys have been conducted and these surveys include the assessment of dieback (eg flora survey of Treeby and Connell treefarms).

The *High Conservation Value Forest and Biodiversity Management Strategy* addresses the procedures for monitoring wetlands, including groundwater dependent ecosystems. These procedures were developed in consultation with appropriate experts. Wetlands are initially assessed according to a *Wetland Condition Index*. Monitoring procedures are described in the strategy and include the sampling of water quality and macro-invertebrates.

At the time of the audit, the Wetland Condition Index had been established for wetlands on some properties in the Albany region, but monitoring procedures had not been implemented as sampling equipment had not yet arrived. Subsequent to the audit, ITC provided the auditor with outcomes from sampling of water quality and macro-invertebrates on the Coolinup property in Esperance.

All of the monitoring procedures proposed by ITC at the present time are designed to monitor on-site impacts. However, the CAR also requires ITC to monitor the offsite impacts of its operations. ITC believes that the on-site focus of monitoring is appropriate at this stage until sufficient data has been collected to assess the possible impact of plantations on the parameters considered as part of this CAR. Once these impacts are better understood, ITC will be in a position to assess the risk of off site impacts and an appropriate monitoring process can be put in place. The auditor accepts this approach and off-site monitoring will be carried over as a new 24 month CAR.

Status: Closed

Follow-up Action (if applicable)

See CAR 04/07

See Observation 02/07

CAR 03/06:	Reference Standard #: 8.2
Non-compliance: Major <input checked="" type="checkbox"/> Minor <input type="checkbox"/>	<p>ITC used Simazine during its 2005 management operations even though, at that point, Simazine was included on the list of non-acceptable chemicals issued by the FSC and certain conditions of a derogation for the use of simazine had not been met. There is no indication that this action was a willful breach of the derogation. There was general confusion prevailing among other forest managers and auditors in Australia regarding the status of FSC derogations on the use of Simazine and particularly regarding the formation of the Pesticides Advisory Group.</p> <p>As of 16 January 2006 the FSC have issued a Simazine derogation (FSC-POL-30-601 Addendum 2), valid until September 2006. This derogation allows FSC certified forest owners and managers in Australia to use Simazine under a set of conditions.</p> <p>It was found that ITC applies Simazine in a responsible manner, but the company has not specified relevant buffer widths for different classes of streams and drainage lines.</p> <p>ITC has not developed the necessary policies for the monitoring of Simazine and has not been carrying out any monitoring of Simazine in catchment areas where Simazine is applied.</p>
<p>Corrective Action Request: ITC shall further develop its procedures and operational practices for the use of Simazine by:</p> <ul style="list-style-type: none"> • Identifying and classifying water courses and drainage lines and, when using Simazine, apply a standardized system for applying buffer zones of suitable width to the specific class of watercourse. • Documenting policies and procedures to be followed with respect to pre- and post-application monitoring of water courses, buffers, native vegetation and soils in catchments where Simazine is applied; the results of this monitoring shall be made available to the Pesticides Advisory Group (when formed) for its consideration. 	
<p>Timeline for Compliance: Three months from receipt of the final Annual Audit report</p>	

Audit findings:

ITC has developed a *Pesticide Procedure* that addresses the use of highly hazardous pesticides and the specific derogation associated with simazine.

The *Pesticide Procedure* includes guidelines for the identification and classification of water courses and drainage lines. It also has a standardized system for applying buffer zones of suitable width to the specific class of watercourse. The processes adequately meet the intentions of this CAR. The auditor notes that buffers are to be applied around some occasionally waterlogged areas, regardless of their ecological significance or the threat of movement into other water systems. While the treatment of these areas is a conservative approach there is scope to further review these guidelines based on risk, in order to minimize the economic impact of the procedures.

Operations staff in the Esperance region were observed to be applying the guidelines when preparing operational maps for the Neerabup property.

The *Pesticide Procedure* refers to the *Water Sampling and Monitoring Procedure*, which is to be applied in order to monitor the effectiveness of “Class 1” buffers and for those “Class 2” buffers that are carrying water at the time of application. The water sampling procedure had not yet been implemented at the time of the audit because spraying had not taken place subsequent to the development of the procedure. Test kits had been ordered and received at the time of the audit.

Status: Closed

Follow-up Action (if applicable):

See Observation 03/07

2.4. New corrective actions issued as a result of this audit

CAR # 01/07:	Reference Standard #: Criterion 5.6
Non-compliance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	<p>ITC has reviewed the productivity of plantations in the Esperance region and it is apparent that several of the previously established plantations will not meet the yield estimates that were expected at the time of establishment.</p> <p>ITC believes that some improvements in productivity can be expected in the future as a result of advances in silviculture, land selection and genetics. In particular, ITC has focused its new land acquisition on an area assessed to have access to groundwater and this is expected to assist growth.</p> <p>The auditor agrees that these changes can be expected to improve the yields from new plantations, but has some concerns about the quantum of improvements estimated by the company. In particular, significant improvement is expected via genetic gain, but it is unclear whether the base genetic material upon which this gain is assessed is equivalent to the genetic material planted in the current stands.</p> <p>If plantation productivities can't be achieved that are commensurate with financial hurdle rates, then properties may need to be converted to alternative land uses following harvesting.</p>
<p>Corrective Action Request:</p> <p>ITC should document the assumptions used to estimate productivity in the Esperance region and demonstrate that the yield estimates are conservative in accordance with Criterion 5.6.</p> <p>On the basis of these estimates, ITC should review the area that is likely to be established in future years. In the event that there is likely to be significant changes to ITC's footprint in this region, a transition plan should be developed that considers the economic, social and environmental impacts of changes to the area under management.</p>	
<p>Timeline for Compliance: Twelve months from receipt of the final Annual Audit report</p>	
CAR 02/07:	Reference Standard #: Criterion 7.2
Non-compliance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	<p>At the time of the audit, ITC did not have an established process for reviewing and adjusting management plans to incorporate changing silvicultural, social and environmental conditions.</p>
<p>Corrective Action Request:</p> <p>ITC should establish a process for reviewing and adjusting management plans. The process should be documented within the management plan and include both the frequency of the review and identification of staff with responsibility for the review.</p>	
<p>Timeline for Compliance: Twelve months from receipt of the final Annual Audit 07 report</p>	

CAR 03/07:	Reference Standard #: Criterion 8.1
Non-compliance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	Criterion 8.1 requires a plan and design for monitoring procedures that is consistent and replicable. ITC has monitoring procedures at a functional level (eg survival counts, foliar analysis, inventory, independent reporting to investors) that are undertaken, documented and well understood. However, the frequency and intensity of routine monitoring on the productive estate is not documented in either the property management plan or the regional management plan. There is a post plant inspection report that provides a good template for recording the outcomes from routine inspections, but this does not appear to be widely used.
Corrective Action Request: The regional management plan should be modified to describe the monitoring procedures that are undertaken on the production estate. The procedures should include a description of the frequency and intensity of routine monitoring, as well as links to the records that are to be kept.	
Timeline for Compliance: Twelve months from receipt of the final Annual Audit report	

CAR 04/07:	Reference Standard #: Criterion 8.2
Non-compliance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	All of the monitoring procedures proposed by ITC at the present time are designed to monitor on-site impacts. The on-site focus of monitoring is appropriate at this stage until sufficient data has been collected to assess the possible impact of plantations on adjacent and regional ecosystems. Once these impacts are better understood, ITC will be in a position to assess the risk of off site impacts and an appropriate monitoring process can be put in place.
Corrective Action Request: Data collected from onsite monitoring of the impacts of plantation operations on local ecosystems should be collated and assessed. The results should be used to document and implement procedures for the off site monitoring of the impacts of plantation operations on adjacent and regional ecosystems.	
Timeline for Compliance: Twenty four months from receipt of the final Annual Audit report	

CAR 05/07:	Reference Standard #: Criterion 9.1, 9.3, 7.4
Non-compliance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	<p>ITC has documented strategies for the identification of HCV and HCV have been identified on an area of approximately 2,200 ha in the Albany region of south west Western Australia. A description of the values is described in the <i>High Conservation Value Forest and Biodiversity Strategy</i>.</p> <p>Threats to HCV are known to field staff and a number of actions are being undertaken to manage the values, including:</p> <ul style="list-style-type: none"> • Fauna trapping; • Eradication of introduced Acacia sp; and • Catchment protection <p>At the time of the audit, documentation had not yet been prepared describing threats to HCV and strategies to protect the values associated with HCV.</p> <p>The <i>South Western Australia Regional Plantation Forests Management Plan</i> does not include the specific measures necessary to ensure the maintenance and/or enhancement of conservation attributes.</p>
<p>Corrective Action Request: ITC should document the threats to values associated with HCV and the strategies that are to be employed to manage these threats.</p> <p>The <i>South Western Australia Regional Plantation Forests Management Plan</i> should be revised to include the specific measures necessary to ensure the maintenance and/or enhancement of HCV.</p>	
<p>Timeline for Compliance: Twelve months from receipt of the final Annual Audit report</p>	

CAR 06/07:	Reference Standard #: Criterion 9.1
Non-compliance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	<p>ITC has involved stakeholders with appropriate expertise in the development of its procedures for identifying HCV. However, the company has not yet organized a credible, independent, technically qualified review of its assessment procedures. Such a review also needs to extend to the threats and management actions identified in CAR #5-2007.</p>
<p>Corrective Action Request: Following the completion of CAR 03/07, ITC should engage a credible, independent, technically qualified person to review its:</p> <ul style="list-style-type: none"> • HCV assessment procedures; • Identified threats to HCV; and • The management actions identified for minimizing these threats. 	
<p>Timeline for Compliance: Twelve months from receipt of the final Annual Audit report</p>	

CAR 07/07:	Reference Standard #: Criterion 9.2
Non-compliance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	ITC is in the process of developing maps and other management tools that can be used to communicate the presence of HCVs, and the associated management restrictions, to its stakeholders. These stakeholders include staff, contractors, neighbours and regional natural resource management groups.
Corrective Action Request: The company shall document its procedure for stakeholder consultation on the HCVF strategy and any actions resulting from stakeholder consultation.	
Timeline for Compliance: Twelve months from receipt of the final Annual Audit report	

CAR 08/07:	Reference Standard #: Criterion 9.4
Non-compliance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	The <i>High Conservation Value Forest and Biodiversity Strategy</i> outlines a number of way in which HCVs will be monitored, including periodic surveys of Condition Index, flora and fauna surveys and wetland monitoring procedures. The primary tool to be used for ongoing monitoring is the survey of Condition Index, which is to be undertaken every three years in the case of remnant vegetation. The timing of wetland monitoring procedures is not specified in the strategy.
Corrective Action Request: The <i>High Conservation Value Forest and Biodiversity Strategy</i> should be revised to ensure that HCVs are monitored on at least an annual basis in order to assess the effectiveness of measures employed to maintain or enhance the applicable conservation attributes. .	
Timeline for Compliance: Twelve months from receipt of the final Annual Audit report	

CAR 09/07:	Reference Standard #: Criterion 8.3
Non-compliance: Major <input type="checkbox"/> Minor <input checked="" type="checkbox"/>	The commercial invoice currently has the description: <i>'At least xxx bdmt (xx%) of this shipment is FSC Credit Material'.</i> The description is inconsistent with the <i>FSC Chain of Custody Manual</i> and should be changed in order to provide a more precise estimate of the quantity of Controlled Wood and to make it clear to the purchaser that the balance of the wood provided is Controlled Wood.
Corrective Action Request: Invoice details should be changed to specify the quantity of FSC Credit Material and the quantity of Controlled Wood.	
Timeline for Compliance: Twelve months from receipt of the final Annual Audit report	

2.5. Audit observations

Observations are very minor problems or the early stages of a problem that does not of itself constitute non-compliance, but which the auditor considers may lead to a future non-compliance if not addressed by the client.

Observation	Reference Std #
01/07: The <i>Social Responsibility Performance Report</i> is generally consistent with the <i>Social Responsibility Policy</i> , but it is noted that some aspects of the policy (eg training and equal opportunity) are not addressed within the report.	4.4

02/07: Mandatory training in the identification and management of dieback could be considered.	8.2
03/07: The <i>Pesticide Procedure</i> includes guidelines that require buffers to be applied around some occasionally waterlogged areas, regardless of their ecological significance or the threat of movement into other water systems. While the treatment of these areas is a conservative approach there is scope to further review these guidelines based on risk, in order to minimize the economic impact of the procedures.	8.2

2.6. Audit decision

This audit was conducted for the purpose of determining whether ITC is still meeting the requirements of the FSC and SmartWood’s Interim Australian Forest Management standards.

It has been found by the auditor that ITC are indeed still meeting the standard, however there are 9 minor CARs that will need to be met within specific timelines for ITC to maintain the certificate.

APPENDIX V: SmartWood Database Update Form

Instructions: For each FSC certificate, SmartWood maintains a Fact Sheet, which includes important summary information about the certificate. During each annual audit SW auditors should work with the certificate holder to verify that the Fact Sheet information is up to date as follows:

1. Print out current Fact Sheet prior to audit from SW website or direct link to fact sheets (<http://www.brandsystems.net/smartwood/>)
2. Review information with the FMO to verify all fields are accurate.
3. If changes are required (corrections, additions or deletions), **note only the changes** to the database information in the section below.
4. The changes identified to this form will be used by the SW office to update the database and communicate these changes to the FSC and other worldwide certification databases.

Is current Fact Sheet accurate and up-to-date? YES NO
(if yes, leave section below blank)

CLIENT INFORMATION (contact info for *SmartWood* and *FSC* website listings)

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	Albany WA 6331	Fax	+61 8 9483 0250
Email	gordon.robson@itclimited.com.au		Webpage www.itclimited.com.au

FORESTS

Change to Group Certificate	<input type="checkbox"/> yes <input checked="" type="checkbox"/> No	Change in # of parcels in group:	total members
Total certified area		145,092 Hectares	Acres

SPECIES (note if item to be added or deleted)

Scientific name	Common name	Add/Delete

PRODUCTS

Product type	Description	Add/Delete