

SUMMARY REPORT

on results of the recertification audit of the FSC Forest Management and the Chain of Custody Certification for SE «Emilchynsky lishosp»

(single)

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Date of Report	August 31, 2021		
Date of Report approval	September 07, 2021		
Date of Report modification			
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	Ukraine, Zhytomyr region, Yemilchyne district:
Location of forest sites subject to certifica-	(Gartivske, Glumchanske, Zhuzhelske, Yemilchynske,
tion	Korolivske, Kochychynske, Barashivske forest divi-
uon	sions); Novograd-Volynskiy district (Barashivske forest
	division)
Certificate registration number	FC-FM/COC-804455
Date certificate granted	23.01.2017
Certificate expiration date	22.01.2022

INTRODUCTION

The FSC forest certification is the evaluation of the forest management system and forest exploitation practices compliance with the approved FSC (Forest Stewardship Council®) Principles.

The Forest Management and Chain of Custody Certificate is a document that proves that the forest management system and forest exploitation practices comply with the FSC requirements.

The present report covers the procedure and results of the recertification audit of the FSC Forest Management /Chain-of-Custody of SE «Emilchynsky lishosp».

Legallis LLC as a contractor of the «Forest Certification» LLC (ASI-ACC-030) as an accredited certification body holds the evaluation of forest enterprises activities compliance with the applied FSC standards.

1. DESCRIPTION OF FOREST MANAGEMENT

1.1. Scope of the certification

1.1.1. Certificate Type

Single		Group	
Single MU Multiple MU		Group	
X	-	-	

1.1.2. Type of SLIMF certificate (not applicable)

Small SLIMF forests Low intensity SLIMF forests		SLIMF Group
-	-	-

1.1.3. Number of group members (for group certification)

Number of group members	Not applicable
-	X

1.1.4. Number of MUs within the certification scope

1

1.1.5. Number of MUs with the area of:

<100 ha	<100 ha 100-1,000 ha		more than 10,000 ha	
_	_	-	1	

1.1.6. Geographical coordinates of MUs

MU	Latitude	Longitude
MU 1	50 ⁰ 52'15"	27 ⁰ 48'26''

1.1.7. Forest zone

Boreal	Temperate	Subtropical	Tropical
-	X	-	-

1.1.8. Total area of the forest lands within the certificate scope

<100 ha	100-1,000 ha	Low intensity SLIMF forests
0	0	0

1.1.9. Total area of the forest lands (by management type)

Private companies State		Communities	
0	51 123,1 ha	0	

1.1.10. Data on forest areas included in the area of certification

MU no.	Region/district	Forest district	Forest compartment no.	Area, ha
		Gartivske	all	8 050,0
		Glumchanske	all	7 332,0
		Zhuzhelske	all	8 378,2
	Yemilchyne district / Zhyto- myr region, Ukraine	Yemilchynske	all	7 753,0
SE		Korolivske	all	7 961,8
· -		Kochychynske	all	7 368,0
«Emilchyn- sky lishosp» (MU 1)		Barashivske	1-43, 47, 51-54, 62, 63, 69-95	3 354,9
(WIC 1)	Yemilchyne district total			50 197,9
	Novograd-Volynskiy district / Zhytomyr region, Ukraine	Barachiveke I		925,2
	Novograd-	925,2		
Total				51 123,1

1.1.11. Sociological information

Number of employees, including contractors operating in forest (taking into account gender differences)

Indicators		Audits				
Indicators	RA	1 st SA	2 nd SA	3 rd SA	4 th SA	
The total number of employees of (M/F)	465 84					
	549					
The number of employees working in forest	171 15					
(F/M).	186					
The number of employees that operate gasoline-	30 -					
powered saws (F/M).	30					

1.1.12. Forest areas included in the certification scope

Category	Area, ha
Forest area excluded from commercial harvesting (excluded from the calculation of final	
felling)	8 798,1
- Forests of environmental, scientific, historical, and cultural significance	5 791,0
- Recreational health forests	2 457,7
- Protective forests	549,4
Forest area excluded from commercial harvesting (excluded from the calculation of final	
felling) and used for minor and secondary forest resources exploitation or for rendering ser-	
vices	
HCVF area (in accordance with the FSC standards classification)	8 459,2
Exploitable forests area / area of exploitable forest fund (mature and over-mature forests for	42 325,0
possible exploitation)	
Plantations area	
Area of forests of artificial origin (forest plantations)	15 493,5
Area of forests of natural origin resulting from seed or coppice reforestation method	30 782,3

1.1.13. Forests with restricted exploitation regime

Table 1

No	Protection Category	Forested area, ha	% of certi- fied area
Forest categorization			

Legalis LLC Forest certification LLC			
1	Forests of environmental, scientific, historical, and cultural significance, including:	5 419,0	10,6
_	- forest areas on specially protected parts of the reserves	5 419,0	10,6
	Recreational health forests, including:	142,1	0,3
	- forests within the boundaries of settlements	7,9	to 0,05
	- coastal forest areas	39,8	0,1
	- forest areas adjacent to railways and roads	27,9	0,1
2	- forest areas around wood grouse habitats	20,3	to 0,05
	- forest areas adjacent to built-up areas	30,8	0,1
	- forest areas of growth or settlement of rare species of plants and animals	14,7	to 0,05
	- forest areas of special economic significance	0,7	to 0,05
	Protective forests, including:	156,6	0,3
	- coastal forest areas	79,7	0,2
	- forest areas adjacent to railways and roads	52,1	0,1
3	- forest areas of growth or settlement of rare species of plants and animals	5,1	to 0,05
	- forest areas used for seed production and breeding	3,0	to 0,05
	- forest areas adjacent to built-up areas	2,4	to 0,05
	- forest areas with a predominance of species not subject to felling	14,3	to 0,05
	Exploitable forests area, including:	1 696,3	3,3
	- coastal forest areas	923,3	1,8
	- forest areas around wood grouse habitats	57,7	0,1
	- forest areas adjacent to built-up areas	110,7	0,2
	- forest areas used for seed production and breeding	19,7	0,1
4	- forest areas of plus, reference and unique plantings	12,1	to 0,05
7	- forest areas around the sources of rivers	19,0	to 0,05
	- forest areas of growth or settlement of rare species of plants and animals	340,9	0,7
	- melliferous plants	0,6	to 0,05
	- forest areas of special economic significance	7,4	to 0,05
	- forest areas with a predominance of species not subject to felling	204,9	0,4
Total			14,5

Distribution by HCV types

Table 2

FSC HCV classification FSC	HCV Types on requirements the applicable FSC forest management standard	Area, ha	% of certified area
HCV 1	Species diversity. Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels.	5 791,0	11,3
HCV 2	Landscape-level ecosystems and mosaics. Intact forest landscapes and large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.	-	-
HCV 3	Ecosystems and habitats. Rare, threatened, or endangered ecosystems, habitats or refugia.	-	-
HCV 4	Critical ecosystem services. Basic ecosystem services in critical situations, including protection of water catchments and control of	204,2	0,4

	erosion of vulnerable soils and slopes.		
	Community needs. Sites and resources fundamental for satisfying		
HCV 5	the basic necessities of local communities or Indigenous Peoples	2 457,7	10
nc v 3	(for livelihoods, health, nutrition, water, etc.), identified through	2 437,7	4,8
	engagement with these communities or Indigenous Peoples.		
	Cultural values. Sites, resources, habitats and landscapes of global		
	or national cultural, archaeological or historical significance,		
HCV 6	and/or of critical cultural, ecological, economic or religious/sacred	6,3	to 0,05
TIC V U	importance for the traditional cultures of local communities or In-	0,5	10 0,03
	digenous Peoples, identified through engagement with these local		
	communities or Indigenous Peoples.		
	TOTAL	8 459,2	16,5

1.1.14. Chemical pesticides application

Pesticides applied	Pesticides not applied
-	X

1.1.15. List of the main tree species

Latin name	Commercial name
Pinus sylvestris	Scots pine
Betula pendula	Silver Birch
Alnus glutinosa	Black alder
Quercus robur	European oak
Populus tremula	European aspen
Carpinus betulus L.	Hornbeam
Quercus rubra	Red Oak
Fraxinus excelsior	European ash
Picea abies	Norway spruce
Tilia cordata Mill. = Winterlinde (Syn.: T. parvifolia)	Small-leaved linden
Ulmus glabra	Wych elm
Larix decidua	European Larch
Pinus banksiana	Jack pine
Populus nigra	Black poplar
Salix alba L.	Osier
Robinia pseudoacacia L.	Black locust
Acer platanoides	Norway maple
Ulmus minor	Dutch elm
Tilia platyphyllos	Large-leaved Linden
	

1.1.16. Annual allowable cut, AAC (MU)

MU	AAC, m ³
Final harvest «realizable wood» - Order no.357 of Ministry of Energy and Environmental	73 780
Protection of Ukraine dated 29.05.2020	73 780
Environmental harvesting and sanitation (salvage) cutting «realizable wood» - Project of	80 050
organization and development of the SE «Emilchynsky lishosp» #186 dated. 2019	80 030
Total	153 830

1.1.17. List of FSC product groups included into the certification scope

FSC product groups Tree species		FSC application
Timber production		
W1.1 Roundwood Coniferous species: Picea abies; Pinus sylvestris; Larix decid- FSC 100		

W1.2 Fuel wood	ua; Pinus banksiana;	
W1.3 Twigs	Deciduous species: Alnus glutinosa; Betula pendula; Carpinus	
	betulus L.; Fraxinus excelsior; Populus tremula; Quercus ro-	
	bur; Quercus rubra; Tilia cordata Mill. = Winterlinde (Syn.: T.	
	parvifolia); Ulmus glabra; Populus nigra; Salix alba L.; Robin-	
	ia pseudoacacia L.; Acer platanoides; Ulmus minor; Tilia	
	platyphyllos.	
NTFP type		
-	-	-

1.2. Summary of the external conditions of the enterprise operation

The State Forest Resources Agency of Ukraine elaborates the state policies and normative and legal regulations regarding forest relations (except special protection forest areas). 73% of forest resources of the country are managed by State Forest Resources Agency of Ukraine.

SE «Emilchynsky lishosp» was founded in 1924. The enterprise was reorganized into lisgospzag (logging company) in 1960 by the Decree no 1834 of Ministers' Council of USSR dated 30 November 1959. Yemilchyne forestry enterprise was created by the Decree of Ministers' Council of USSR dated 12 July 1988 and the respective order no 133 of Ministry of Forestry of Ukraine dated 31 October 1991, also by the order no 162 «On the organization of forestry management structure» of the association «Zhytomyrlis» dated 11 November 1991.

The enterprise was reorganized into SE Yemilchynske lisove gospodarstvo («Yemilchynsky lisgosp») by the order of State Forestry Committee of Ukraine no 123 dated 23 February 2005.

First forest management measures were implemented on the areas within the enterprise area in 1924. Next forest management practices were realized in 1938, 1948, 1957, 1977 and 1987.

SE «Emilchynsky lishosp» is a state-owned enterprise. It carries out management activities on the forest lands of state ownership, which are transferred to the enterprise on sustainable use basic. The limits of sustained use forest lands are represented on the maps and in kind. The forest enterprise has produced the state acts for sustained use of the forestry fund lands. The forest lands of the enterprise are not subject to purchase and sale, but the local authorities may transfer them to other holders on tenancy basic by means of taking decisions. In conformity with the law, local people have free access to the forest area for recreation and collecting non-timber production to satisfy their own needs.

1.3. Forest resource use rights

1.3.1. Rights of the enterprise to use forest resources

State acts of land use (100% of territory) and forest management plan confirm the enterprise right of the forest management and forest resource use. The forestry enterprise has rights only for realizing forest exploitation and forest management. The enterprise does not use forest resources with another aim (recreation, agricultural activity, precious fossils extraction, exploration works, etc.).

1.3.2. Review of rights to use the lease forest areas by persons/organizations other than the certificate applicant/certificate holder

Hunting areas of the enterprise are leased to sports clubs and social organizations: Adelaida Hunter LLC 301 ha, private-owned enterprise «Specialized hunt «Simakivske» 5 340 ha, social organization «Hunting and fishing club «Medvedovo» 3 409 ha, social organization «Hunting and fishing club «Rys-Verby» 3 011,1 ha, Hunters of Polissia LLC 895,7 ha, social organization «Hunting and fishing club «Kashtan» 13 729,9 ha, «Yemilchyne district organization of Ukrainian fishing and hunting association» 692.7 ha.

The enterprise does not use forest resources with another aim (agricultural activity, precious fossils extraction, exploration works, etc.).

1.4. Description of forest areas not included in the certification area

whole area MU	The certification includes not all MUs, which are	Some leased or managed areas
	leased or managed /the certification does not in-	of MUs are excluded from the
	clude leased or managed MUs previously	certification
X	-	-

1.5. Review of the forest management plan

1.5.1. Summary of forest management objectives

Long-term objectives of forest management are:

- Providing conditions of sustainable exploitation of forest reserves.
- Introducing the most efficient methods of planning and stimulating personnel oriented to significant improvement of forest management indices.
 - Providing conditions of keeping regulations and rules of labour protection and safety practice.
- Support of natural forms of flora and fauna species evolution and their distribution on the areas of forest reserves within SE «Emilchynsky lishosp» .
 - Introducing advanced technologies of harvesting for waste minimization and disposal.
 - Providing conditions of monitoring gain, reforestation and harvesting volumes.
- Preparation of measures for minimization of harvesting impact on the environment within the forest areas of the enterprise.
- Designing projects of detecting and saving threatened and endangered species of flora and fauna on leased areas.
 - Taking measures for improving identification and values of HCVF areas.

Mid-term objectives of forest management are:

- Development of justifications of advanced technologies application in harvesting, reproduction and fire protection activities of the forest enterprise.
 - Providing conditions of timely payments for forest use, salaries and taxes.

1.5.2. Brief description of forest resources

1.5.2.1. Status of land use and land property rights

Rights of the enterprise to use forest resources

Repre-	tion a	exploita- and man- aent plan		al Allowab (AAC), housand m	2		Total standing	Average	, years
sentative of State Authorities	#	Regis- tration date	Total	Final	Thin- ning opera- tions	Area, ha	volume, thousand m ³	species composi- tion	Lease term, years
State Forest Resources Agency of Ukraine	№ 186	2019	153,83	73,78	80,05	51 123,1	9 125,62	4Ps2Qr3Bp 1Alg+Pt	Not applicable

1.5.2.2. Socio-economic conditions

The district of the forestry enterprise location is related to the agricultural area of the region, and specialized in the cultivation of crops, flax, and potatoes and so on.

The forestry enterprise takes a leading place in the economy of the district. The main directions of the enterprise development are the increase of forest stands' productivity, satisfaction of local and other regions inhabitants' needs in timber and other forest resources, also partly export sales.

Agricultural areas of forest fund are used by forest service to satisfy the needs of the hunt in feed.

Forest lands are not used for grazing livestock. Nevertheless, some cases of grazing animals on woodland borders near populated area occur.

Yield of minor products comprises keeping apiary, haymaking and extracting birch sap, collecting wild fruits, mushrooms, berries and drug plants. As a rule, such harvesting of minor products by local people is not of an industrial nature.

Worsening of the district demographic situation has played a significant role in the decrease of the secondary yield of the enterprise forest lands.

Elks, roes, wild pigs, foxes, hares, beavers, badgers, wolves and other species represent hunting fauna of the forestry enterprise.

Hunting is a sporting activity.

Besides the satisfaction of national economy's needs in timber and minor forest products, the forest stands of the forestry enterprise are critical to environmental and recreational factors. Namely, they are used in the regulation of esthetical, sanitary, recreational, anti-erosion and water protection functions. Existing reclamation systems, taking into account its actual conditions, is not able to perform the last ones.

The district, where the enterprise is located, has a well-developed road network. Besides, the enterprise puts great efforts to build the network of timber transport roads connecting them to the highways used actively by local people too. Principal traffic arteries within the operating area of the enterprise are Shepetivka – Novograd-Volynskiy – Korosten Railway; highways Krasnoarmiisk – Yemilchyne – Olevsk and Shepetivka – Vaskovychi.

The forestry enterprise attaches four farming enterprises with total area of 1300 ha to provide technical assistance and supervision over forest management activities. Besides, the affiliated company «Yemilchynskyi lisgosp APK» of Zhytomyr municipal agroforestry «Zhytomyragrolis» with total area of 43500 ha, including the forest lands subject to local authorities, is founded within the district.

1.5.2.3. Composition of forest stands

The management of forest enterprises and MUs is based on current species composition. Dominant species of the enterprise are next: Common pine (37,5 %), European white birch (30,3 %), and English oak (21,1 %), Black alder (8,8 %), European aspen (1,3%), other species (1,0%).

Distribution of forest plantations by prevailing species

Main forest species	Forested area, ha
Pinus sylvestris	17 336,2
Betula pendula	14 024,3
Alnus glutinosa	4 071,1
Quercus robur	9 757,3
Populus tremula	599,1
Carpinus betulus L.	137,8
Quercus rubra	20,4
Fraxinus excelsior	109,1
Picea abies	184,8
Tilia cordata Mill. = Winterlinde (Syn.: T. parvifolia)	0,7
Larix decidua	9,9
Pinus banksiana	3,9
Populus nigra	2,9
Salix alba L.	18,3
Total	46 275,8

Average inventory indices of MU (LAT)

Legallis LLC Forest certification LLC pe and overripe Relative density Average stock Total stock of Quality grade stands, m³/ha change (incre-Category of forest Compositions of forest stand stand Conifers Pinus sylvestris 8Ps2Bp+Qr 58 1,2 0,71 275 4,1 Deciduous hardwood 1,5 Quercus robur 7Qr1Ps1Bp1Alg+Pt 0,69 3.2 68 265 Deciduous softwood 5Bp2Pt1Qr1Alg1Ps Betula pendula 40 1,7 0,70 236 3,6 Alnus glutinosa 7Alg2Bp1Pt 46 1,8 0,64 242 3,5 Total 4Ps2Qr3Bp1Alg+Pt 53 0,70 254 3,7 1,5

1.5.2.4. Description of neighboring lands

SE «Emilchynsky lishosp» of Zhytomyr region administration of forestry and hunting is situated in the central part of Zhytomyr region within Yemilchyne and Novograd-Volynskiy administrative districts.

The forestry enterprise is contiguous with DP «Olevsk lisgosp» and DP «Bilokorovytskyi lisgosp» on the north; DP «Korostenskyi lisgosp» on the east; DP «Gorodnytskyi lisgosp» on the west; DP «Novograd-Volynskyi lisgosp» of Zhytomyr region administration of forestry and hunting.

1.5.3. Description of the enterprise and organizational structure

SE «Emilchynsky lishosp» of Zhytomyr region administration of forestry and hunting is situated in the north-west of Zhytomyr region within Yemilchyne administrative district.

The forestry enterprise includes seven forest districts: Gartivske, Glumchanske, Zhuzhelske, Yemilchynske, Korolivske, Kochychynske, Barashivske and lower land located in village Zhuzhel. The main office of the enterprise is located in urban village Yemilchyne.

Forest area occupy 34,8% of Yemilchyne district territory. Forests are located densely, by separate commons. Economic activity of the forestry enterprise is oriented to an appropriate, efficient implementation in full extent of management, forest regeneration, harvesting measures in full extent, basing on the advances of science and technology, which ensure sustainable use and reproduction of forest resources; environmental protection; protection against wind and water erosion.

Technical support and transport service are ample for the realization of all forest activities. The enterprise is provided completely with necessary facilities and manned by 100% of regular workers.

Forest service is involved in economic activities, including fire danger period. The forestry enterprise takes leading positions in the economy of the district. The main direction of its development is sustainable forestry management oriented to sound use and reproduction of forest resources.

Livestock grazing is limited on forest lands.

New Year coniferous tree farming and extracting birch sap represent minor products of the forest lands. The enterprise does not harvest wild berries and mushrooms, but realizes felling permits for local people.

The enterprise has own hunt. The branch of hunting is the area of state social production. Its main task is the protection, regeneration and use of hunting animals' populations; providing hunting services, sport hunting development and hunting dogs breeding. The hunting on the lands of the enterprise has an amateur nature. Next species of fauna for hunting inhabit the forest areas of the enterprise: elk, roe deer, wild hog, hare, fox and wolf.

The part of the enterprise area is leased to four hunts: public and private ones.

Forest stands critical to water erosion and blowing of soil, protecting soil fertility and increasing crop yield are of main importance. Water regulation forest stands are critical to the hydrologic behaviour of rivers and streams.

Use of forest resources and all forest management practices are planned without an environmental Summary report to the public on the results of the recertification audit of ESC forest management certification and internal Q

impact in conformity with the current regulations of forestry. They are going to ensure sound use of forest resources, increase of forest productivity and quality, reinforcement of their capacities of protection.

1.5.4. Description of the harvesting technology

The forest management system of the enterprise involves various types of tending felling, including cleaning, weeding, isolation, late thinning, also selective and clear salvage cutting, regeneration, reconstruction and other types of cutting.

The stands is allotted for shaping and sanitation felling basing on the data of inventory and monitoring of the stands actual condition, performed by the specialists of the forestry.

The trees having no conservation value are periodically removed from the stands composition during sanitation felling. The stands are allotted for cleaning and weeding by means of dedicated sampling areas (3% of pure stands area and 5% of mixed stands area). Sampling indices are used for total area of the block. One sampling area is allocated if the block total area is less than 3 ha, two sampling areas are used if the block total area is more than 3 ha.

The species are allotted for isolation and late thinning considering uniform location of valuable trees. If the relative density of a stand is 0.7 and less, the isolation felling is not applied. If the relative density of a stand is 0.8 and less, the late thinning is not performed.

Improvement cutting combines crop-tree thinning and thinning from below.

Brush cutters and gasoline-powered chainsaws Husqvarna and Stihl are used to perform improvement felling.

Workers perform sanitary felling (cleaning, weeding activities) within young forest area by means of either felling axes, or bush-cutters Husqwarna and Stihl.

Harvesting works are carried out by means gasoline-powered chainsaws «Husqvarna» or «Stihl», as a rule. Rubber-tired skidders MTZ-80 and MTZ-82 are used in trailing. Timber is hauled by means of motor vehicles, namely particularly by the timber trucks on base of ZIL-131, URAL or KRAZ.

Personnel of the enterprise and contractors are engaged in harvesting and hauling operations. The number of contractors depends on the volume of activities.

Mainly, the contractors perform final felling and thinning activities. The contractors' number varies depending on the volume of performed activities.

According to the designed project, the soil cultivation is realized by tractors MTZ-80, MTZ-82 in assembly with the plow PKL-70 or by the disc cultivator KLB-1.7. The soil cultivation is performed either in autumn or in spring before planting.

Yearlings or biennials are planted by hand using Kolesov's planting iron according to the scheme of planting and mixing approved within the project. Technical reception of forest plantations takes place in spring of current year. Mechanical and hand weeding practices previewed by the project are implemented. The inventory is performed in November of current year; the survival capacity is assessed and the grade of plantations is determined.

Plantations are completed during next years by necessity.

1.5.5. Description of measures for environment protection

Forest stands of the enterprise have environmental and recreational significance; are critical to the functions of soil protection, water protection and control.

Forest stands critical to water erosion and blowing of soil, protecting soil fertility and increasing crop yield are of main importance. Water regulation forest stands are critical to the hydrologic behaviour of rivers and streams.

Forest stands perform an important recreational function by means of their oxygen and phytoncide high production, able to decrease or absorb polluting emissions and other negative environmental effects. All these factors demonstrate a great significance of forest stands in the operating area of the enterprise with the economic activity oriented to the protection and growth of forest resources by means of sustainable use; the increase of environmental, water protection and sanitary capacities of forest areas.

The enterprise realizes landscape felling and salvage cutting and reforestation activities by necessity to ensure high ecological capacities of forest stands.

Rough changes of climate (temperature increase, precipitations decrease), causing the decline of forest stands, and also a significant growth of beaver population, which increases ground bogging, damage forest stands the most during last years.

1.5.6. Description of strategy on identification and conservation of rare, threatened and endangered species of flora and fauna

The strategy on identification and conservation of rare, threatened or endangered species of flora and fauna:

- 1. The enterprise experts examine the Red Data Book of Ukraine and the list of flora and fauna representatives, which shall be included in the Red Data Book.
- 2. Consultations with a wide range of the stakeholders, including research institutes and forest inventory bodies.
- 3. Compilation of a list of sub compartments for every compartment where the species from the Red Data Book are encountered; determination of their protection regime; relevant mapping during uninterrupted forestry.
 - 4. Fulfilment of requirements for preserving the Red Data Book species within the enterprise area.

1.5.7. Description of monitoring procedure

The monitoring procedure provides for collecting information about the following indices:

- 1. yield of all harvested forest products;
- 2. growth rates, regeneration and condition of the forest;
- 3. composition and observed changes in the flora and fauna;
- 4. environmental and social consequences of harvesting and other operations;
- 5. costs, productivity, and efficiency of forest management.

Documentary evidence of collecting information:

- data about the actual yield of harvested wood by types and methods of cutting;
- data about area of cutting by types and cutting methods;
- data about types and volumes of harvested forest resources, except wood;
- data about reforestation rates by methods;
- data about volumes and types of forest protection practices;
- data about volumes of illegally harvested wood and illegal activities within the managed area;
- data about forest management expenses;
- data about economic efficiency of harvesting;
- data about areas and plantations stock destroyed or damaged by forest fires, pests, diseases and other reasons;
 - data about dynamics of social indices at the enterprise;
 - data about forest management effect on social position of the local people;
 - data about HCV and protected areas;
 - data about forest management impact on environment.

1.6. Data on the actual cut compared to the annual allowable cut for the last and current years by species groups

		2020		in January-July 2021			
Forest type	Actual yield, m ³	Incl. mer- chantable	% of AAC develop-	Actual yield, m ³	Incl. mer- chantable	% of AAC develop-	
	,	wood, m ³	ment		wood, m ³	ment	
Coniferous	35 686	32 592	91,3	17 008	15 186	42,5	
Deciduous hardwood	4 912	4 636	58,1	7 578	6 606	82,8	
Deciduous softwood	23 941	22 725	75,5	16 349	14 598	48,5	
Total	64 539	59 953	81,3	40 935	36 390	49,3	

1.7. Number of occupational accidents

Accidents	RA	1 st SA	2 nd SA	3 rd SA	4 th SA
Accidents	0				
Lethal	0				

2. DESCRIPTION OF THE FSC STANDARD

Audit	The applied standard	Code / Version	Date
RA	The FSC National Forest Stewardship Standard of Ukraine	FSC-STD-UKR- 01-2019 / V 1-0	30.03.2020

Reference to the Standard for English version / Ukrainian version:

https://fsc.org/en/document-centre/documents/resource/428 https://ua.fsc.org/ua-ua/nasha-diyalnist/-07

3. EVALUATION PROCEDURE

3.1. Forest management system approach

The forest management certification implies that auditors visit the forest enterprise and its forest district offices where they interview the employees in charge and analyze the documentation from every department.

The auditors visit such the production areas: upper and intermediate wood storages, fuel and lubricants, pesticide storages, repair service department and garages, lower landing and places of timber products release. In those departments the auditors evaluate health and safety procedures, fire safety status, handling procedures of solid and liquid waste, compliance with the FSC requirements concerning social issues and tracking the movement of timber in the internal supply chain.

At the forest fund area, the auditors visit the sections which are allocated for harvesting allowable cut, logging sites in the development of different technologies logging (whiplash and assortment logging, manual and mechanized machine felling) on which it is evaluated following of forestry requirements, health and safety procedures, fire and ecological safety (stage, use and utilization of fuel and lubricants), following the measures for biodiversity conservation. With regards to the selective sanitary felling, the auditors evaluate the correctness of tree selection. With regards to selective felling, the auditors evaluate accuracy of the activity and the possible impact on forestry, which will be held by felling. The auditors visit bordering areas with the water protection zones, waterways, roads, crossings, bridges and other forest infrastructure.

The auditors visit objects of forest seed base (seed orchards and plots, plus stands) and the nurseries, including areas of pesticide use.

The auditors visit the cutting sites on variously aged stands (1,5 and 10 - years ago) where they conduct an overall assessment of the conservation elements of forest environment, depending on the size and quality of reforestation (sowing and planting of forest cultures - seedlings, planting material with closed root system and etc.)

The auditors visit the representative areas, HCV (including places of local population importance), and key seasonal habitats has monitoring character, it means they also examine if the organization conducts any forest management activities in these areas and if the protection regime is being observed. If any activities are being held, the auditors evaluate to what extent these activities may cause a destruction of the high conservation value.

The result of management system evaluation is considered the auditors general analysis of the enterprise ability to implement consistently and effectively the management system, taking into account the availability of (sufficiency) technical and human resources.

3.2. Sampling of sites for field evaluation

The sample is not applicable because the company has 1 MU

When planning the schedule of the recertification audit, the lead auditor decided to visit the forest sites where various harvesting methods were applied, including the cutting sites that were harvested at that time. The field inspection plan included the visit to the forest plantations of various years, the natural regeneration sites and the HCV.

Definition of audit duration

		Labor
	№ MU	costs,
Managed forest areas selected for assessment	312 1110	man /
		days
	1	5,0
Factors that increase the audit time		
1. In determining the duration of the audit, the requirements of the limited infrastru	acture, the high-	
ly fragmented managed areas and the seasonal conditions are not taken into account of FC clients have a developed infrastructure, no audits are planned during the pand no managed plots with winter forest fund are planned for evaluation in the sumr If the sites are significantly removed from the organization's office, the auditor show help of the enterprise, organize overnight stays at an insignificant distance from the in order to reduce the time for moving to forest sites (hotels, production bases, field For contractor Legallis: Consider the following indicators - the presence of fragmentation of the forest fund (the number of forest areas). From 10 – 50 (0,5 man / days); From 51 – 100 (1,0 man / days); From 501 – and more (2,0 man / days).	eriod of slough, mer. ald, with the managed sites	+ 1,0
- the presence of mountain conditions or difficult-terrain (ravine-beam forests) (2,0 miles). When planning an audit, the auditor should add to the total cost of the audit to while removing stakeholders from 50–150 km from the organization's office, 1 mar to 300 km and 2 man / days over a distance of 300 km. Note: labor costs include travel time. For contractor Legallis:	0.5 man / days,	
When planning an audit, the auditor should add to the total labor costs for conducting the audit 0.5 man / days when removing interested parties at a distance of 15-25 km, 0.75 man / days when removing interested parties at a distance of 26-50 km, 1 man / day for removing stakeholders from 50-150 km, 1.5 man / days at a distance of 150 to 300 km and 2 man / days for a distance over 300 km from the organization's office. Note: labor costs include travel time.		
3. In the event of acute disputes between the organization and interested parties, we audit, the auditor should add 1 man / day to the total cost of the audit to handle acute	e disputes.	+ 0,0
4. If there are complaints from interested parties regarding the organization, when planning an audit, the auditor should add to the total cost of 0.5 audit days for each complaint. Note: in the event that the interested party cannot be contacted by means of communication or the interested party requests a personal meeting, the interested party is removed from 50-150 km from the organization's office, 1 man / day from 150 to 300 km and 2 man / days over a distance of over 300 km. Note: labor costs include travel time.		
5. In determining the labor costs, this requirement is not taken into account, the certification body always conducts preliminary audits.		
6. When planning an audit, the auditor should add to the total there-cost of the audit for 1 hour for each open discrepancy. The total amount of time for open inconsistencies is rounded up to 0.5 man / days, if the number of inconsistencies is up to 4 inclusive and 1 man / day, if the number of inconsistencies is from 5 to 8, etc.		
7. In the case of application to the field of organization's assessment of principle 3 an audit, the auditor should add 1 man / day to the total cost of the audit.	, when planning	+ 0,0

Legams Elle	III DEC
8. If, as a result of the sampling, principle 9 is included in the assessment, the auditor should add 1	
man / day to the total cost of conducting an audit, with HCVF up to 30% of the total area of the	+ 1,0
managed sites and 1.5 man / days for HCVF over 30 % of the total area of managed sites.	
Factors that reduce audit time	
9. In the case of group and multiple managed forest plots, the time for assessment can be reduced	
to 30% in the following cases:	
1) Group association refers to type II;	
2) The number of managed sites in the organization does not exceed 10.	
3) The number of managed sites is more than 10, but the organization has a department responsible	- 0,0
for certification. The number of personnel in the department for less than 2 people who are not bur-	- 0,0
dened with additional duties.	
4) The number of plots is more than 10, but there are structural divisions that manage several man-	
aged plots (forestry enterprises, forest industry enterprises).	
5) During the certification period, there is no suspension of the certificate.	
10. In the absence of significant inconsistencies and the number of minor inconsistencies does not	
exceed 15, in each of the previous assessments of two control audits, the total number of audit dura-	- 0,0
tion can be reduced to 20%.	
Total audit duration, man / days	8,0

3.3. Audit description

<u>The recertification audit</u> of SE «Emilchynsky lishosp» was conducted on August 03 - 06, 2021 by the audit group with the following membership: Topchii O. – lead auditor, Rybak D. – auditor.

The auditors checked the enterprise forest management compliance with the FSC National Forest Stewardship Standard of Ukraine FSC-STD-UKR-01-2019 V 1-0.

Implemented audit program

Date	Program	Place	Auditors
03.08. 2021 Tue.	 O9-00 Opening meeting. Interviews with the enterprise management and experts. Analysis of company documents. Review of evidence of elimination of nonconformities identified in the fourth surveillance audit. Consultations with the stakeholders / interested parties. Visits to the enterprise forest stands. Planning of the next day audit itinerary. Filling of the check list. 17-00 Summary of the results of the 1st day of the audit with the participation of the enterprise representatives. 	Office of the enterprise	Topchii O. Rybak D.
04.08. 2021 Wed.	 09-00 Visits to 2 forest districts of the enterprise. Interviews with the enterprise management and experts. Visits to the forest areas. Control of the sub-contractors. Consultations with the stakeholders. Planning of the next day audit itinerary. Filling of the check list. 17-00 Summary of the results of the 2nd day of the audit with the participation of the enterprise representatives. 	Office, forest are- as, production sites of the divi- sions of the enter- prise	Topchii O. Rybak D.
05.08. 2021 Thu.	 09-00 Visits to 2 forest districts of the enterprise. Interviews with the enterprise management and experts. Visits to the forest areas. Control of the sub-contractors. Consultations with the stakeholders. Planning of the next day audit itinerary. Filling of the check list. 17-00 Summary of the results of the 3rd day of the audit 	Office, forest areas, production sites of the divisions of the enterprise	Topchii O. Rybak D.

	with the participation of the enterprise representatives.		
	09-00 Analysis of company documents.		
06.08.	- Interviews with the enterprise management and experts.		
2021	- Consultations with the stakeholders.	Office of the en-	Topchii O.
Fri.	- Filling of the check list.	terprise	Rybak D.
ГП.	- Internal discussion of the audit results.		
	16-30 Final meeting on the audit results.		

3.4. Time spent on the evaluation (man-days)

No	Audit stage	Audit				
NO	Audit stage		1 st SA	$2^{\text{nd}}SA$	$3^{rd}SA$	4 th SA
1	Audit preparations	0,5				
2	Correspondence with the stakeholders. Information col-	0,5				
2	lection from mass-media	0,5				
	Audit preparations (total)	1				
3	Interview with the stakeholders (in person)	2				
4	Control of the documentation in the office	2				
5	Field audit	4				
	Total: Field audit	8				
6	Preparation of the Report draft	10				
	Total (incl. Report)	19				

3.5. Information about auditors

Audit		Status in the audit	Name	Qualification (educa-	Employer and posi-
		group	1 (dille	tion)	tion
		Lead Auditor	Topchii O.	Forestry Engineer	Legallis LLC,
	RA	Leau Auditoi	Topciiii O.	Polestry Eligilieer	Expert auditor
KA		Auditor	Rybak D.	Forestry Engineer	Legallis LLC,
		Auditol	Kybak D.	Forestry Engineer	Expert auditor

The resumes of the aforementioned employees are available from the Legallis LLC, Kyiv, and the Forest Certification LLC, Moscow.

3.6. Reviewer details (only for the main audit)

Not relevant for RA

3.7. Consultations with the stakeholders

Recertification audit

Legallis LLC posted a corresponding message on the website of the FSC National Representative Office in Ukraine https://ua.fsc.org/ua-ua/newsroom/id/687, the website of the Sustainable forestry development in Ukraine https://sMU.org.ua/ogoloshennja/audyty-fsc-dp-yemilchynskyy-lisgosp-i-baranivskelmg-traven-2021, well as on the its page in social network Facebook as https://www.facebook.com/lis.expert/ in order to receive feedback and suggestions on the activities of SE «Emilchynsky lishosp» from an uncertain circle of interested parties.

No comments were received from stakeholders on the activities of the audit company.

In the course of the control audit, face-to-face interviews with representatives of stakeholders were conducted (by phone):

- Representative 1;
- Representative 2;
- Representative 3;
- Representative 4;
- Representative 5;

- Representative 6;
- Representative 7.

Stakeholders' interview results

FSC Principles Stakeholders' comments 1. No evidence of law violations. 2. The enterprise pays all necessary taxes to the local budget timely. 3. The company constantly cooperates with local communities, local people and other stakeholders to prevent forest law violations. 4. Measures by the enterprise to protect forests against violations of forest legislation are effective. 5. Stakeholders are familiar with the procedure for handing complaints, in accordance with applicable law. 6. Stakeholders are not aware of the company there is olated appeals to which the company responds promptly and adequately. Principle 3. Indigenous peoples' rights 1. The conceptive regularly provides the local communities with fire wood, construction materials, seedlings also provides equipment, takes part in the construction and repair of roads, and support for the school forestry. 4. Stakeholders are familiar with the procedure for handing complaints, in accordance with applicable law. 5. Stakeholders are not aware of the company there are isolated appeals to which the company responds promptly and adequately. 1. The conception of the school forestry. 2. The company does not sufficiently inform or does not inform all stakeholders about the current and planed forestry activities, as well as the possible positive and negative consequences of these activities. 2. The company employs only local residents. 3. The enterprise regularly provides the local communities with lire wood, construction materials, seedlings also provides equipment, takes part in the construction and repair of roads, and support for the school forestry. 4. Stakeholders are not aware of the company there are isolated appeals to which the company responds promptly and adequately. 5. Stakeholders are not aware of the company there are isolated appeals to which the company responds in report are isolated appeals to which the company responds in report when the procedure for handing complaints, in accordance with applicable law. 5. Stakeholders are not aware	Stakeholder's lifter	view results	
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budget timely. 3. The company constantly cooperates with local communities, local people and other stakeholders to prevent forest law violations. Principle 1. Compliance with laws 4. Measures by the enterprise to protect forests against violations of forest legislation are effective. 5. Stakeholders are not aware of the company / there are isolated appeals to which the company responds promptly and adequately. Principle 2. Workers rights and employment conditions Principle 3. Indigenous peoples rights 1. The enterprise pays salaries to the employees timely. 1. The company does not sufficiently inform or does not inform all stakeholders about the current and planned forestry activities, as well as the possible positive and negative consequences of these activities. 2. The company employs only local residents. 3. The enterprise regularly provides the local communities with fire wood, construction materials, seedlings, also provides equipment, takes part in the construction and repair of roads, and support for the school forestry. 4. Stakeholders are familiar with the procedure for handling complaints, in accordance with applicable law. 5. Stakeholders are not aware of the company / there are isolated appeals to which the company responds promptly and adequately. 6. The stakeholders are informed about the presence of places of special cultural, historical, ecological and religious significance on the territory of forests of the enterprise which relate to village council. 7. The enterprise provides information to local communities on the commercial harvesting of non-wood forest products by third parties and restrictions on harvesting due to radiation pollution of the territories. 8. The company has agreed with the stakeholders on socially significant places and its conservation regimes, and also complies with the established regimes. Principle 5. Benefits from the forest		1. No evidence of law violations.	Mentioned in report
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Principle 4. Community relations local population on the activities of the company / there are isolated appeals to which the company responds promptly and adequately. 6. The stakeholders are informed about the presence of places of special cultural, historical, ecological and religious significance on the territory of forests of the enterprise which relate to village council. 7. The enterprise provides information to local communities on the commercial harvesting of non-wood forest products by third parties and restrictions on harvesting due to radiation pollution of the territories. 8. The company has agreed with the stakeholders on socially significant places and its conservation regimes, and also complies with the established regimes. Principle 5. Benefits from the forest 1. The company cooperates with local hunting farms of various forms of ownership. Mentioned in report		4. Stakeholders are familiar with the procedure for han-	_
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from the forest various forms of ownership.		8. The company has agreed with the stakeholders on socially significant places and its conservation regimes, and also complies with the established regimes.	Mentioned in report
Principle 6. Environmen- 1. Joint activities are carried out to control the number Mentioned in report			Mentioned in report
	Principle 6. Environmen-	1. Joint activities are carried out to control the number	Mentioned in report

Eeganis EEC		1 01000 00100110000 220
tal values and impacts	tal values and impacts of animals on the territory of the enterprise.	
	2.Approval of the placement of reproduction sites, organization and conduct of biotechnical activities is carried out.	Mentioned in report
	3. The agreed modes of farming on the territory of reproduction sites and biotechnical objects are carried out.	Mentioned in report
Principle 7. Management planning	1. The local community is aware of planned forest management activities.	Mentioned in report
Principle 8. Monitoring and assessment	1. The local public is aware of the Report on monitoring of economic activities and HCV.	Mentioned in report
Principle 9. High conservation values	1. The local community is involved to identify HCV and territories of its location.	Mentioned in report
Principle 10. Implementation of management activities	1. The company promptly carries out works on reforestation.	Mentioned in report

The information gathered from the stakeholders during the audit is used in related sections of the present summary.

3.8. Changes in the certification scope

Audit	Changes
	The holder of the certificate declared the following changes to the scope of the certificate:
	- transition to the FSC version of the national Forest management System standard for Ukraine
	FSC-STD-UKR-01-2019 V 1-0;
	- the area of the managed forest area increased by 2.1 ha and, as a result, amounted to 51 123.1
RA	ha;
	- the following breeds have been added to all product groups: Larix decidua; Pinus banksiana;
	Populus nigra; Salix alba L.; Robinia pseudoacacia L.; Acer platanoides; Ulmus minor; Tilia
	platyphyllos;
	- increased forest area excluded from commercial logging (from 8,221.4 ha to 8,798.1 ha).

3.9. Enterprise Group Certification

Not applicable for individual certification.

4. EXECUTIVE SUMMARY

4.1. Strengths and weaknesses

On the basis of the results of the recertification audit of the forest inventory system and the internal chain of custody of SE «Emilchynsky lishosp» were revealed nonconformities of Principals and Criteria of FSC in the activity of the enterprise. They were qualified as Minor conditions. These results are reflected in present report.

4.1.1. The main strengths of the enterprise:

- High level of the professional competence of the top management and experts.
- Tendency to achieve environmentally sound, cost-beneficial and socially oriented use of forest and of forest management.
- Dynamically developing enterprise which invests into rebuilding and renovation of production means.
 - High volumes of domestic processing of harvested wood.
 - High level of cooperation with stakeholders who represent local people.

4.1.2. The main weaknesses of the enterprise:

• The Enterprise does not pay sufficient attention to engaging affected parties in the development of dispute resolution mechanisms and other processes.

Summary report to the public on the results of the recertification audit of FSC forest management certification and internal 7 supply chain of SE «Emilchynsky lishosp»

• The enterprise pays insufficient attention to informing the affected parties about planned forest management activities and their engagement in taking measures to identify, prevent and mitigate significant negative social, environmental and economic impacts of management activities.

- The Company pays insufficient attention to the completeness of the Summary of the Management Plan and the Summary of Monitoring Results in accordance with Appendices D and F of the Standard.
- The company pays insufficient attention to the compliance of the monitoring aspects with the requirements of Annex F of the Standard.

4.2. General description of observations

Based on the conducted assessment according to all applicable FSC Principles of Standard, stake-holder interviews, field audit of the locations of economic activities, analysis of the developed documentation, verification of qualifications and availability of necessary personnel (including contractors), as well as all necessary in sufficient level technical and human resources of the enterprise, the group of auditors identified that the developed forest management system of SE «Emilchynsky lishosp» was consistently implemented into production process and is generally effective.

5. SUMMARY AND DECISIONS

5.1. Auditor's conclusions

The next conclusion was made, following the recertification audit results.

Major conditions ($\underline{\mathbf{0}}$), Minor conditions ($\underline{\mathbf{16}}$) and potential discrepancies - Observations ($\underline{\mathbf{3}}$) were detected by standard FSC-STD-UKR-01-2019 V1-0.

Major conditions ($\underline{\mathbf{0}}$), Minor conditions ($\underline{\mathbf{0}}$) were closed by standard FC-STD-02 V 1.2.

All non-conformities are requested for corrective measures. Monitoring the implementation of corrective actions for conditions is subject to verification within 12 months from the date of completion of the audit.

Based on the above the leading auditor recommends reissuing the FSC-certificate of forest management and internal chain of custody SE «Emilchynsky lishosp» taking into account the elimination of the Conditions within the required time, and changes in the field of certification according to the information from paragraph 3.8. this report.

5.2. Certification Committee decision

Based on the conclusions of the recertification audit, published in the report on the results of the evaluation of the SE SE «Emilchynsky lishosp» , the Certification Committee formulated the following decision.

Because the management system of SE «Emilchynsky lishosp» able to meet all of the applicable standard on the whole forest territory included into the scope of the assessment, as well as that the certificate holder demonstrated that the described system of management is being implemented consistently across the scope of the certificate, in the absence of identified Major non-compliances, SE «Emilchynsky lishosp» can be reissued the FSC certificate of forest management and internal supply chain, subject to timely resolve <u>16</u> terms, identified at the last audit within the period established for this purpose and changes in the scope of certification according to the information from paragraph 3.8. of this report (protocol no. b/n of 07.09.2021).

5.3. Results of discrepancies' elimination after the previous (4th control) audit

5.3.1. Major Conditions

Major condition 40 (Mj-40)		
Standard	FC-STD-02-V1-2 i. 8.3.4.	
Requirement	The accompanying documentation for all sold certified products of the Enterprise include the following information: - Product type; - Product volume;	

Legallis LLC Forest certification LLC - Place of harvesting/manufacture of the products; - Date of harvesting/manufacture of the products; -FSC certificate number of FSC product category; Information about the customer; - Information about the dispatch. The accompanying documentation for the sold certified products of the enterprise Non-compliance does not always include the certificate code and the FSC statement. **4SA** In the course of a survey of management, it was found that the company sells all of its timber as certified. However, a selective study of the submitted accompanying documentation for the products sold by the enterprise showed that some of the shipping documents do not contain the certificate code and the FSC statement. Objective evidence <u>**DA**</u> Within the specified time frame, the enterprise did not provide evidence of analysis and corrective actions sufficient to close the previously identified nonconformity. In connection with the above, the lead auditor made a decision to increase the grade of nonconformity to a Major Condition. Identification date Deadline Status Closure date Deadline for cor-Until 17.09.2021 rective actions and 18.06.2021 (3 months from the 06.08.2021 Closed their status date of detection) **Certification Body Conclusions** An interview with the chief forester / responsible for certification and analysis of the documents provided (Order No. 92-a dd of June 25, 2020 "On the use of the certificate code and FSC claim" and the corresponding Minutes of the meeting) showed that the results of the fourth surveillance audit were reviewed by the management of the enterprise. A production meeting with responsible persons was held, control over the indication in the accompanying documentation of the FSC certificate number and the FSC product category was strengthened as part of the implementation of corrective actions to eliminate the identified non-conformity. Further interviews with the chief forester and responsible for the administration of the Electronic Timber Accounting System (ETAS) showed that the FSC certificate code and FSC claim are indicated in the accompanying documentation automatically when it is issued using the ETAS of State Enterprise "Forestry Innovation and Analytical Center" (FIAC). The subsequent analysis of the shipping documents for the sale of forest products for June-July 2021 showed that the documentation for the sale of round timber con-Justification for tains the certificate code FC-FM / COC-804455 and the FSC 100% claim, indicatclosing Mi ed at the top of the document. Also, a part of the documentation that does not actually relate to the sale, but is documentation for the supply of fuel wood to the population as a social benefit (fuel rate) for personnel and retirees of the enterprise does not contain information on the status of products. Subsequent interviews with the chief forester / responsible for certification and study of the documents provided (Order "On elimination of inconsistencies identified during the audit for certification according to the FSC system", Minutes of the workshop and the Minutes of training of responsible persons), showed that the reasons for the significant inconsistency were considered the management of the enterprise as part of the implementation of corrective actions to eliminate the discrepancy. Additional training of the involved persons was carried out and control over the indication of the FSC certificate number and the FSC category of products in all accompanying documentation was strengthened both at the stage of acceptance /

delivery of products and at the stage of internal control by specialists of the relevant

structural units.
Conclusion : The company provided evidence of corrective action sufficient to close
this Major non-compliance.

5.3.2. Minor conditions

Mn-40 transferred to Mj-40.

5.4. Results of the current (recertification) audit

5.4.1. Major conditions

Not identified.

5.4.2. Minor conditions

Minor conditions 01 (Mn-01)					
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 1.6.1.				
Requirement	A publically available dispute resolution process is in place; developed through culturally appropriate engagement with affected stakeholders.				
Non-compliance		ute resolution process i		engaging affected	
Objective evidence	Interviews with the chief forester / responsible for certification and the secretary indicated that the resolution of disputes on issues of statutory or traditional law are planned to be resolved in accordance with applicable law. Dispute resolution can also be carried out in court, if necessary, with the involvement of superior, controlling and law enforcement agencies, in the interests of the enterprise and the state, since the enterprise has a state form of ownership and is a user of land and forest resources that are the property of the state. The company supports the rights of the population to freely stay in the forests and use certain non-timber resources for their own needs, and the dispute resolution process is regulated by the "Regulations on the procedure for considering written applications of citizens, including written applications of citizens by means of electronic communication and consideration of applications / complaints of the local population for compensation for caused by actions / inaction of the State Enterprise "Emilchynsky lishosp"" posted in the public domain in section Information/Certification on the company's website on the Internet https://dpelg.com.ua/ . Further interviews and analysis of the above document showed that representatives of local communities were not involved in its development - the parties whose interests are affected. Further interviews and analysis of the above document showed that representatives of local communities - the affected parties did not engage in its development. Given that the requirements of the indicator are partially met, the auditor decided to classify the identified non-compliance as a Minor Condition.				
Deadline for cor-	Identification date	1	Status	Closure date	
rective actions and their status					

Minor conditions 03 (Mn-03)			
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 2.3.2.		
Requirement	Internal control over compliance with labor and safety practices is being implemented.		
Non-compliance	Internal control over compliance with labor and safety regulations by contractors is not documented.		

Legallis LLC Forest certification LLC An interview with an occupational safety engineer showed that the company carries out internal control over compliance with occupational health and safety rules, covering full-time employees and contractors, which involves: - forestry specialists who are constantly at the work sites and implement current control, including over compliance with labor protection and safety regulations; - managers and specialists of forestries, conducting systematic inspections, the results of which are displayed in the Logs of operational control over the state of labor protection: Objective evidence - an occupational safety engineer who, together with the heads of structural divisions, conducts systematic inspections, the results of which are displayed in the Inspection Acts of the involved contractors and are subsequently analyzed during production meetings. However, a subsequent interview showed that the results of the contractors' control were not documented due to the absence of violations on their part since the end of 2020. Given that the requirements of the indicator are partially met, the auditor decided to classify the identified non-compliance as a Minor Condition. Identification date Fulfilment period Status Closure date Deadline for cor-Until 05.08.2022 rective actions and

(12 months from the

date of detection)

Open

06.08.2021

their status

Minor conditions 0	4 (Mn-04)			
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 2.3.7.			
Requirement	After major incidents or accidents, safety and health requirements are analyzed and revised and timely communicated to workers.			
Non-compliance	Occupational safety requirements after accidents are brought to the notice of contractors' employees in a generalized manner.			
Objective evidence	An interview with an occupational safety engineer showed that the company systematically takes preventive measures to reduce industrial injuries and occupational diseases, which include: - Development of standards, training and instructing personnel on labor protection, safety and industrial hygiene; - Monitoring the state of labor protection, safety and industrial hygiene, as well as analysis of its results; - Provision of personnel with appropriate equipment, PPE and special clothing, and places of work with medical kits and fire extinguishing equipment; - Carrying out medical examination of personnel and updating materials for certification of workplaces for working conditions; - Availability of up-to-date permits for performance of high-risk works; - Monitoring and analysis of industrial injuries in the industry, analysis of the work of the regular labor protection service. Further interviews showed that the management of the structural divisions brings this information to the staff and conducts unscheduled briefings based on the results of the analysis of the statistical information received on accidents at the enterprises of the industry, in accordance with the relevant Orders of the enterprise. However, informing the contractors' management by the enterprise is carried out orally, is not regulated and is not documented, as a result of which unscheduled briefings of its personnel were carried out not in all contractors. Given that the requirements of the indicator are partially met, the auditor decided to classify the identified non-compliance as a Minor Condition.			
Deadline for cor-	Identification date Fulfilment period Status Closure date			

Legams LLC			1 Ofest ce	Tillication LLC
rective actions and		Until 05.08.2022		
their status	06.08.2021	(12 months from the date of detection)	Open	

Minor conditions 06 (Mn-06)				
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 4.2.4.			
Requirement	The Organization prior to management activities that affect the local communities' identified rights provides: 3) informing local communities about current and planned forestry activities in the future.			
Non-compliance	*		•	,
Objective evidence	The enterprise does not ensure that all local communities are informed about current and planned management activities in the future prior to their commencement. Interviews with the chief forester, specialists of the forestry department and structural units, as well as surveys of local communities showed that the company informs local communities about the planned management activities and its possible social, environmental and economic consequences before the start of management activities by: - consulting process on the planned management activities initiated by the enterprise; - carrying out a legally regulated procedure for assessing the environmental impact of planned activities for the special use of forest resources in the order of final felling; - engagement in the survey of plantations regarding the feasibility of clear sanitary felling; - posting information about planned fellings with reference to cartographic materials on the sectoral state resource State Enterprise "Forestry Innovation and Analytical Center" (FIAC), as well as summary information in the public domain in the section Our activities/Logging on the company's website on the Internet https://dpelg.com.ua/. However, some representatives of local communities stated in interviews and polls that after the end of the administrative-territorial reform in the region, the consultative process on planned management activities on the part of the enterprise is focused on the side of the formed enlarged central United territorial communities and does not always cover the starosta districts subordinate to them. Given that the requirements of the indicator are partially met, the auditor decided to classify the identified non-compliance as a Minor Condition.			
D 111 0	Identification date	Fulfilment period	Status	Closure date
Deadline for cor-		Until 05.08.2022		
rective actions and their status	06.08.2021	(12 months from the date of detection)	Open	

Minor conditions 0	8 (Mn-08)
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 4.2.6.
Requirement	The Organization ensures informing of local communities on limitations for harvesting NTFP due to radioactive contamination of territories.
Non-compliance The enterprise does not document informing local communities about the strictions on NTFP procurement due to radioactive contamination of territories.	
Objective evidence	An interview with the chief forester / responsible for certification showed that 76.3% of the territory of the enterprise is contaminated with radionuclides, including zone 3A - 27 892.7 hectares with pollution 1.01-2.00 Cu/km², zone 3B - 11 133, 0 ha with pollution 2.01-5.00 Cu/km². according to the Project for the organization and development of forestry of the State Enterprise "Emilchinsky forestry" of the

Legallis LLC Forest certification LLC Zhytomyr Regional Department of Forestry and Hunting (No. 186 of 2019). These levels of contamination do not prohibit the procurement of NTFPs, but govern the mandatory radiological control of harvested products. Further interviews showed that the company provides oral information to local communities about the above restrictions, and the population is competent in this matter, as the area previously belonged to the third zone of radioactive contamination of the territory (guaranteed voluntary resettlement area). However, the company did not provide evidence of documentary information to local communities by the company. Given that the requirements of the indicator are partially met, the auditor decided to classify the identified non-compliance as a Minor Condition. Identification date Fulfilment period Status Closure date Deadline for cor-Until 05.08.2022 rective actions and 06.08.2021 (12 months from the Open their status

date of detection)

Minor conditions 0	9 (Mn-09)
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 4.5.1.
	Through culturally appropriate engagement with local communities, measures are
Requirement	implemented to identify, avoid and mitigate significant negative social, environmen-
	tal and economic impacts of management activities.
Non-compliance	Measures to identify, prevent and mitigate significant negative impacts of manage-
Non-compliance	ment activities are not carried out with the involvement of all local communities.
	Interviews with the chief forester and heads of structural divisions showed that
	measures to identify, prevent and mitigate social, environmental and economic im-
	pacts are carried out when planning the management activities of the enterprise and
	include the following:
	- Preliminary assessment of the impact of planned management activities on the en-
	vironment and taking into account the results of the assessment during its imple-
	mentation;
	- A preliminary assessment of the possible social and economic consequences, in-
	cluding the amount of taxes paid to the central and local budgets, contributions to
	social insurance funds, employment and wages, social assistance to the local popu-
	lation, the development of local infrastructure for maintaining forest roads and tak-
	ing into account the results of the assessment during its implementation.
	Further interviews and analysis of the above materials provided showed that the
	possible social, environmental and economic impacts of economic activities during
Objective evidence	the preliminary assessment are not identified as significant negative, and the en-
objective evidence	gagement of local communities in this process is carried out by:
	- informing local communities about the activities of the enterprise in the form of a
	consultative process initiated by the enterprise on the planned forest management
	activity;
	- direct engagement of local communities in the environmental impact assessment of
	planned activities for the special use of forest resources in final felling in
	2019/2020;
	- direct engagement of local communities when planning clear cuttings;
	- posting information about planned fellings with reference to cartographic materi-
	als on the sectoral state resource State Enterprise "Forestry Innovation and Analyt-
	ical Center" (FIAC), as well as summary information in the public domain in the
	section Our activities/Logging on the company's website on the Internet
	https://dpelg.com.ua/.
	However, individual representatives of local communities during interviews and
Cummary vaport to the	polls stated that after the end of the administrative-territorial reform in the region, epublic on the results of the recertification audit of FSC forest management certification and internal 23

	the consultative process on planned forestry activities on the part of the enterprise			
	is focused on the formed integrated central United territorial communities and does			
	not always cover the starosta districts subordinate to them.			
	Given that the requirements of the indicator are partially met, the auditor decided			
	to classify the identified non-compliance as a Minor Condition.			
Dandling for son	Identification date	Fulfilment period	Status	Closure date
Deadline for cor-		Until 05.08.2022		
rective actions and	06.08.2021	(12 months from the	Open	
their status		date of detection)	-	ļ

Minor conditions 1	Minor conditions 10 (Mn-10)			
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 4.6.1.			
Requirement	A publicly available dispute resolution process is in place, developed through cul-			
Requirement	turally appropriate e	engagement with local co	mmunities.	
Non-compliance	The current dispute	resolution process is de	signed without invol	ving affected par-
14011-compliance	ties.			
		Chief Certification Office	-	
	, · · · · · · · · · · · · · · · · · · ·	pensation to local comm		0 0
		e management activities	-	
		e law. Dispute resolution		-
	•	nvolvement of superior, o		· ·
		of the enterprise and the		_
	form of ownership and is a user of land and forest resources that are the property of			
	the state.			
Objective avidence	The dispute resolution process is regulated by the "Regulations on the procedure			
Objective evidence	for considering written applications of citizens, including written applications of			
	citizens by means of electronic communication and consideration of applications /			
	complaints of the local population for compensation for caused by actions / inaction of the State Enterprise "Emilehypely lighesp"" posted in the public domain in sec			
	of the State Enterprise "Emilchynsky lishosp"" posted in the public domain in section Information/Certification on the company's website on the Internet			
	https://dpelg.com.ua/.			
	Further interviews and study of the above document showed that representatives of			
		• •		_
	local communities - the affected parties did not engage in its development. Given that the requirements of the indicator are partially met, the auditor decided to classify the identified non-compliance as a Minor Condition.			-
Dandling for say	Identification date	Fulfilment period	Status	Closure date
Deadline for cor-		Until 05.08.2022		
rective actions and their status	06.08.2021	(12 months from the	Open	
uich status		date of detection)		

Minor conditions 1	1 (Mn-11)
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 6.2.1.
	An environmental impact assessment identifies and assesses potential present and
Requirement	future impacts of management activities on environmental values, from the stand
_	level to the landscape level, prior to the start of forest site-disturbing activities.
Non-compliance	The environmental impact assessment of management activities is not carried out
Non-compliance	for all planned activities and does not cover all potential impacts.
	Interview with the employee responsible for certification showed that the environ-
Objective evidence	mental impact assessment is carried out by the enterprise before the start of eco-
	nomic activities (during the allotment of cutting areas), during which the possible
	current [immediate] and future impacts of management activities on environmental
	values are determined and assessed. The auditor was presented with the materials

Legallis LLC Forest certification LLC

of various activities and proposed assessments of the possible negative impact

	of various activities and proposed assessments of the possible negative impact of			
	economic activities on the environment. Their analysis showed that environmental			
	impact assessment is not carried out for all forestry activities (there are no acts for			
	road construction) and all potential threats are not assessed (formalized).			
	Given that the requirements of the indicator are partially met, the auditor decided			
	to classify the identified non-compliance as a Minor Condition.			
Deadline for cor-	Identification date	Fulfilment period	Status	Closure date
rective actions and		Until 05.08.2022		
their status	06.08.2021	(12 months from the	Open	
		date of detection)		

Minor conditions 12 (Mn-12)				
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 6.4.6.			
Requirement	The Organization has developed and implemented the training program for its employees and contractors as well as the awareness programme for stakeholders to prevent the collection, hunting or catching of rare and threatened species.			
Non-compliance	The training program for its own staff and contractors, as well as informing stake-holders to prevent the collection, hunting or capture of rare and threatened species is partially implemented.			
Objective evidence	A survey of the management and the employee responsible for certification showed that the company has developed a «Program for training its own personnel and contractors regarding the prevention of collection, hunting and trapping of rare and endangered species of plants and animals» dated 02/08/2021. According to this Program, informing staff and contractors about the prohibition of collection, catching and hunting for rare and endangered species is carried out. However, a further survey of the employee responsible for the certification showed that the company did not inform the stakeholders on this issue in any accessible way (Internet, social networks, print media). Given that the requirements of the indicator are partially met, the auditor decided to classify the identified non-compliance as a Minor Condition.			
Dandling for our	Identification date		Status	Closure date
Deadline for cor- rective actions and their status	06.08.2021	Until 05.08.2022 (12 months from the date of detection)	Open	

Minor conditions 1	3 (Mn-13)
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 7.5.1.
Requirement	A summary of the management plan in a format comprehensible to stakeholders including maps and excluding confidential information is made publicly available at no cost.
Non-compliance	The management plan summary does not cover all of the elements listed in Annex D.
Objective evidence	A survey of management and stakeholders showed that a summary of the management plan in a format understandable to stakeholders, including maps and excluding confidential information, is available to the public on the company's website on the Internet: https://dpelg.com.ua/informacija/zvit-dlja-gromadskosti.html. Also, enterprise cards are available for stakeholders on open sectoral government resources. However, a detailed analysis of the content of the concise forest management plan has shown that it does not cover all the elements listed in Annex D. Given that the requirements of the indicator are partially met, the auditor decided to classify the identified non-compliance as a Minor Condition.

	6				
Deadline for cor-	Identification date	Fulfilment period	Status	Closure date	
	rective actions and their status	06.08.2021	Until 05.08.2022 (12 months from the date of detection)	Open	

Minor conditions 1	Minor conditions 14 (Mn-14)				
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 7.6.1.				
Requirement		Culturally appropriate engagement is used to ensure that affected stakeholders are proactively and transparently engaged in the following processes:			
Non-compliance	The enterprise does this indicator.	not engage stakeholder.	s in all the processe	es provided for by	
Objective evidence	During the survey of the management and the employee responsible for certification, it was identified that the company engages the affected and interested stakeholders in some of the processes listed in this indicator. Thus, the mechanism for resolving issues related to remuneration and staff complaints about violation of their rights at the enterprise was implemented through the consideration of such complaints by the enterprise's trade union organization. Consideration of disputes on various issues with affected and interested stakeholders is provided in accordance with the procedures in force at the enterprise. Also HCV of all types were identified as a result of consultations with local communities and other affected (interested) stakeholders. However, the entity did not provide evidence of stakeholder engagement with the identification of negative social, environmental and economic impacts of management activities (criterion 4.5), and dispute resolution processes (criteria 1.6 and 4.6). Given that the requirements of the indicator are partially met, the auditor decided to classify the identified non-compliance as a Minor Condition.				
Deadline for cor-	Identification date	Fulfilment period	Status	Closure date	
rective actions and their status	06.08.2021	Until 05.08.2022 (12 months from the date of detection)	Open		

Minor conditions 1	Minor conditions 15 (Mn-15)			
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 8.2.1.			
Requirement		The social and environmental impacts of management activities are monitored consistent with Annex F.		
Non-compliance	· ·	Monitoring the social and environmental impacts of management activities does not cover all areas regulated by Annex F of the Standard.		
Objective evidence	environmental impact the "Procedure for n fund of the State Endetailed analysis of ance with the require for Ukraine (FSC-ST) therefore, monitoring ities is not fully carried Given that the required	ble employees showed the cts of management active nonitoring high conservanterprise "Emilchynsky lithis Procedure, it was four ements of Annex F of the TD-UKR-01-2019 V 1-0), and the social and envirous ied out. Tements of the indicator fied non-compliance as a	ities is carried out it tion value forests (Hishosp"". However, und that it was not it FSC-national forest and onmental impacts of it are partially met, th	n accordance with ICVF) in the forest in the course of a updated in according system standard management activ-
Deadline for cor-	Identification date	Fulfilment period	Status	Closure date
rective actions and their status	06.08.2021	Until 05.08.2022 (12 months from the	Open	

	date of detection)	

Minor conditions 1	conditions 16 (Mn-16)			
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 8.2.2.			
Requirement	Changes in environn	nental conditions are mor	nitored consistent wi	th Annex F.
Non-compliance	Monitoring changes	in environmental conditi	ions does not cover d	all areas regulated
Non-compliance	by Annex F of the Sto	andard.		
	A survey of respons	ible employees showed t	hat monitoring of cl	nanges in environ-
	mental conditions is	carried out in accordan	ce with the "Proced	ure for monitoring
	high conservation value forests (HCVF) in the forest fund of the State Enterprise			
	"Emilchynsky lishosp"". However, in the course of a detailed analysis of this Proce-			
Objective evidence	dure, it was found that it was not updated in accordance with the requirements of			
Objective evidence	Annex F of the FSC-national forestry system standard for Ukraine (FSC-STD-UKR-			
	01-2019 V 1-0), and therefore monitoring changes in environmental conditions are			
	not fully implemented.			
	Given that the requirements of the indicator are partially met, the auditor decided			
	to classify the identified non-compliance as a Minor Condition.			
Deadline for cor-	Identification date	Fulfilment period	Status	Closure date
rective actions and		Until 05.08.2022		
	06.08.2021	(12 months from the	Open	
their status		date of detection)		

Minor conditions 1	Minor conditions 17 (Mn-17)			
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 8.4.1.			
Requirement	A summary of the monitoring results consistent with Annex F, in a format comprehensible to stakeholders including maps and excluding confidential information is made publicly available at no cost.			
Non-compliance		The summary of monitoring results does not cover all the elements listed in Annex F of the FSC National Forest Management Standard for Ukraine.		
Objective evidence	A survey of manager format understandal information, are available for star However, a detailed ing of economic actifor 2020" showed the Given that the requi	ment and stakeholders sole to stakeholders, including the tothe public on the finite of the indicator of the indicator of the non-compliance as a	howed that the moning the maps and excluding maps and exclude the company's websicon adskosti.html. Also and the public on the State Enterprise "Emple elements listed in Andrew are partially met, the state that	uding confidential te on the Internet: o, enterprise maps rces. results of monitor-pilchynsky lishosp"
Deadline for corrective actions and their status	Identification date 06.08.2021	Fulfilment period Until 05.08.2022 (12 months from the date of detection)	Status Open	Closure date

Minor conditions 1	Minor conditions 18 (Mn-18)			
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 9.2.2.			
Requirement	Management strategies and actions are developed to maintain and/or enhance the identified High Conservation Values and to maintain associated High Conservation Value Areas prior to implementing potentially harmful management activities.			
Non-compliance	Management strategies and measures developed by the enterprise, which are aimed at supporting and / or enriching certain HCVs and supporting associated HCVFs, contain partially generalized information.			

Objective evidence	ny has developed a de "Emilchynsky lishos," HCV and supporting ment showed that it identified by the entlogging and fires, a spread of invasive specified that the requirements of the specifical developments of the specifical developments.	sployee responsible for the document, "Operating rep", which are aimed at so HCVF associated with contains generalized injuryerprise for HCF and HCP prevention of forest polyecies). The indicator fied non-compliance as a	egimes for HCV in the supporting and enrice them. Analysis of the formation on the preceive (protection of fultion with household are partially met, the support of the sup	he State Enterprise whing the identified me submitted docu- evention of threats forests from illegal waste and the
Deadline for cor- rective actions and their status	Identification date	Fulfilment period	Status	Closure date
	06.08.2021	Until 05.08.2022 (12 months from the date of detection)	Open	

Minor conditions 19 (Mn-19)				
Standard	FSC-STD-UKR-01-2019 V 1-0 i. 9.2.3.			
	Affected and interested stakeholders and experts are engaged in the development of			
Requirement	management strategies and actions to maintain and/or enhance the identified High			
	Conservation Values.			
	FMO does not document the engagement of affected stakeholders, interested stake-			
Non-compliance	holders and experts in the development of management strategies and activities			
	aimed at supporting and / or enriching certain HCVs.			
	During the recertification audit, it was established that the company consulted with			
	the affected and interested stakeholders (forest inventory organization, State Spe-			
	cialized Forest Protection Enterprise "Vinnytsialisozahyst", Polissia branch of			
Objective evidence	UkrNDILGA, etc.) when developing management regimes. However, no document-			
Objective evidence	ed evidence of the involvement of specialists and experts from these organizations			
	was provided.			
	Given that the requirements of the indicator are partially met, the auditor decided			
	to classify the identified non-compliance as a Minor Condition.			
Deadline for cor-	Identification date	Fulfilment period	Status	Closure date
rective actions and		Until 05.08.2022		
their status	06.08.2021	(12 months from the	Open	
then status		date of detection)		

6. INTERNAL CHAIN OF CUSTODY

5.1. Risk assessment	During the recertification audit of SE «Emilchynsky lishosp» the auditors noticed		
	that the wood is delivered to the lower landing only from the forest districts be-		
of timber mixing	longing to the enterprise. The enterprise does not buy third parties wood.		
6.2. Description of	The timber harvested in the forest stands of the enterprise is not been mixed with		
control procedures	the not certified third-parties' timber on any stage.		
	Standing timber: The company is selling standing timber – whips the		
	«stump».		
6.3. Points of trans-	Harvested wood: The enterprise is selling wood from the upper landing	X	
fer of ownership for (loading site) or from the intermediate storage.		Λ	
timber products	timber products Lower landing of the enterprise: The transfer of ownership on the lower		
	landing is under the control of the enterprise.	X	
	Production/warehouse outside the enterprise: The transfer of ownership		
	takes place when unloading at the buyer's warehouse.		
	Other: The scope of the internal chain of custody is limited by the storage	X	

	Ecganis EEC			
	of logs on the lower landing. Next, a separate certificate for a chain of cus-			
	tody issued to the enterprise is in effect.			
	Comment: The company has a separate certificate FM-COC-804574. Valid until			
	July 25, 2022.			
6.4. Description of documentation	The enterprise implemented a system of electronic records of wood which implies that on the upper landing all logs are signed with labels with individual numbers. At the same time, the information about the log parameters and its number on the label is entered into the PDA. When a batch of wood is shipped, the PDA generates a Waybill-forest which specifies all the necessary information about the sender and the recipient, the amount of shipped wood and its parameters. In addition to the Waybill-forest, an analog specifications list with all logs and their label numbers is compiled. The wood can be shipped from the upper landing with the buyer's transport vehicle(s), or for the shipping to the lowers landing using the own transport. If the wood is being shipped from the lower landing a Waybill-forest (in case of road transport) or a railway bill (in case of railway transport) is generated. In any case all logs keep their labels.			

6.5. Description of the use of FSC trademarks

Indicator	Comment
1. Does the company use FSC trademarks to separate / label wood «on prod-	No
ucts»?	140
1.1 Brief description of the use cases of the FSC trademarks «on products»	-
1.2 Availability of approval of the use of FSC trademarks «on products»	-
1.3 Reference to the discrepancy	-
2. Does the company use FSC trademarks for advertising purposes?	No
2.1 A brief description of the use of trademarks in advertising	-
2.2 Availability of approval of the use of FSC trademarks for advertising purpose	-
2.3 Reference to the discrepancy	-