

ANNUAL SURVEILLANCE EVALUATION 2 (remote)

FSC FOREST MANAGEMENT

FORM GHANA LIMITED

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Table of Contents

- 1. METHODOLOGY..... 3**
- 2. REPORT 3**
- 4. DESCRIPTION OF FOREST MANAGEMENT 5**
 - 4.1 CERTIFIED AREA, FOREST, LAND USE HISTORY AND REGIONAL CONTEXT 5
 - 4.2 MANAGEMENT SYSTEM 12
 - 4.3 SUMMARY OF MANAGEMENT PLAN..... 12
 - 4.3.1 Company background 12
 - 4.3.2 The management objectives..... 13
 - 4.3.3 The forest resources..... 13
 - 4.3.4 Management structures 14
 - 4.3.5 Silvicultural and/or other management systems being implemented..... 14
 - 4.3.6 Environmental safeguards..... 15
 - 4.3.7 Management strategy for the identification and protection of rare, threatened and endangered species 15
 - 4.3.8 Monitoring procedures 15
- 5. STANDARDS 16**
 - 5.1 STANDARDS USED 16
 - 5.2 ADAPTATION OF THE STANDARD 16
- 6. THE EVALUATION PROCESS..... 17**
 - 6.1 AUDIT TEAM AND QUALIFICATIONS 17
 - 6.2 DESCRIPTION OF SURVEILLANCE AUDIT 17
 - 6.3 STAKEHOLDER ISSUES 20
- 7. OBSERVATIONS..... 21**
 - 7.1 NON-CONFORMITIES AND CORRECTIVE ACTION REQUESTS..... 21
 - 7.1.1 Overview of non-conformities identified at previous evaluation..... 22
 - 7.1.2 Identified non-conformities during present evaluation 23
 - 7.2 OBSERVATIONS 25
 - 7.3 ISSUES HARD TO ASSESS..... 25
 - 7.4 POSSIBLE ISSUES RELATED TO THE ADAPTATION OF THE LOCALLY ADAPTED STANDARD 25
 - 7.5 COMPLAINTS 25
- 8. CERTIFICATION PROPOSAL..... 26**
 - 8.1 STATEMENT..... 26
 - 8.2 CONDITIONS FOR CERTIFICATION 26

1. Methodology

Control Union Certifications (CUC), a member of the Control Union is an international inspection and certification body and is accredited for FSC (FSC-ACC-019 [Trademark License Code FSC® A000507]) for the scope of FSC Forest Management, Controlled Wood and Chain of Custody certification worldwide.

Audit and certification is carried out in conformity with the procedures as laid down in the Procedure Manual and the program manual for the auditor and certifier. During the audit the qualified CUC auditors use standardised audit forms to record their findings.

Based on the information provided by the auditor and by the client, the certifier reviews and evaluates all information provided and certifies the products when all conditions of the regulations are fulfilled. The result of the evaluation is documented in Chapter 8. Audit work by the auditor and certification by the certifier are clearly separated activities.

2. Report

This report is the result of the findings of a certification evaluation carried out by an independent team of experts representing Control Union Certifications. The purpose of the assessment was to evaluate the ecological, economic and social performance of **FORM Ghana Limited** with respect to the Forest Stewardship Council (FSC). The report is made in accordance with standard FSC-STD-20-007 V3-0 (Forest management evaluations), FSC-STD-20-007A V1-0 (Forest certification reports) and FSC-STD-20-007B V1-0 (Forest certification public summary reports).

The first part (chapters 1 - 8) is the public summary of the report, which is published on the FSC database of registered certificates (www.fsc-info.org). The full audit report (including the public summary) is sent to the client and contains detailed information about the client's forest management. The full report can only be reviewed by authorized Control Union and FSC staff and reviewers who are bound by confidentiality agreements.

In case of any complaint or appeal with respect to findings and certification decisions taken by CUC, a dispute protocol and form is available on the CUC website (http://cucpublications.controlunion.com/publications.aspx?Program_ID=2) and can also be provided on request.

3. Conversion table

Data presented in this report should be in metric system units. If non metric system units are used, the following conversion rates shall be applied.

Metric	Imperial	Metric	Imperial
Length		Area	
25,4 mm=0,0254 m	1 inch	6,45 cm ² =0,00065 m ²	1 sq inch
1,0000 m	39,37 inches	1,000 cm ²	0,1550 sq inch
30,48 cm=0,3048 m	1 foot=12 inches	0,09290 m ²	1 sq foot
1,000 m	3,2808 feet	1,0000 m ²	10,764 sq foot
0,9144 m	1 yard=3 feet	0,8361 m ²	1 sq yard
1,6093km=1609,3m	1 mile	1,0000 m ²	1,1960 sq yard
1,000km	0,6214 mile	2,5900 km ²	1 sq mile
		1,0000 km ²	0,3861 sq mile
Weight		Volume	
28,350 g	1 ounce	0,02832m ³	1 cbc foot
1 g=0,001 kg	0,035274 ounce	1,0000 m ³	35,315 cbc foot
0,45359 kg	1 pound	0,7646 m ³	1 cbc yard
1 kg	2,2046 ponds	1,0000 m ³	1,3080 cbc yard
1,016 ton	1 long ton	0,56826 l	1 pint
1,000 ton	0,9842 long ton	1 l=0,001 m ³	1,75976 pints
		4,546 l	1 gallon
		1 l	0,21997 gallon

4. Description of forest management

4.1 Certified area, forest, land use history and regional context

Basic quantitative information

There are no changes in the basic information (hectares and such).

Type of certificate			
<input checked="" type="checkbox"/>	Single FMU	<input type="checkbox"/>	Small SLIMF certificate
<input type="checkbox"/>	Multiple FMU	<input type="checkbox"/>	Low intensity SLIMF certificate
Forest zone			
Boreal	<input type="checkbox"/>	Temperate	<input type="checkbox"/>
Subtropical	<input type="checkbox"/>	Tropical	<input checked="" type="checkbox"/>
Total number of FMU's in scope of certificate: Two			
Number of FMU's in scope: Asubima and Afrensu Brohuma Forest Reserve			
Less than 100 ha		1000-10 000 ha	1
100-1000 ha		More than 10 000 ha	
Eligibility of SLIMF; Total forest area in scope of certificate which is included in FMUs that:			
<input type="checkbox"/>	# are less than 100 ha		
<input type="checkbox"/>	# are between 100 has – 1 000 ha		
<input type="checkbox"/>	# meet the criteria as low-intensity SLIMF FMUs		
<input checked="" type="checkbox"/>	# N/A		
Total forest area:			
<input checked="" type="checkbox"/>	Privately managed: 3447.34 ha		
<input type="checkbox"/>	State managed: ha		
<input type="checkbox"/>	Community managed: ha		

Certified forest area under scope

Name FMU	Area (ha)	Location	
		Latitude N/S	Longitude E/W
Asubima Forest Reserve	1667.48	-10 51' 45.15''	7024'46.63''
Afrensu Brohuma	1779.86	-10 51' 5.53''	7022'43.59''

Land Use Classification of FMUs

Name FMU	Area (ha)						Total
	Production Natural forest (non-plantation)	Production Plantation	Conservation/protection	Water	Non-forest	Other:	
Asubima		1418.41	249.08				1667.48
Afrensu Brohuma		1507.44	272.41				1779.86
Total Area		2925.85	521.49				3447.34

Composition of the certified forests

Area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives: 521,49 ha			
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services: -			
Area of forest classified as 'high conservation value forest': 0 ha			
<i>HCV Code</i>	<i>HCV Description</i>	<i>Location on FMU (description)</i>	<i>Area</i>
1	Forest areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	-	0 ha
2	Forest areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.	-	0 ha
3	Forest areas that are in or contain rare, threatened or endangered ecosystems.	-	0 ha
4	Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	-	0 ha
5	Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).	-	0 ha
6	Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).	-	0 ha
TOTAL HCVF AREA			0 ha
Total area of production forest:			
Area of production forest classified as 'plantation': 2925.85 Ha			
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems: 2925.85 Ha			
Area of production forest regenerated primarily by natural regeneration or by a combination of natural regeneration and coppicing of the naturally regenerated stems: 490.24 Ha			

List of product categories to be included in scope of joint FM/COC certificate (available for sale as FSC-certified products) and list of main commercial timber and non-timber species:

Product Category	Botanical (Latin) Name	Common trade Name
<input checked="" type="checkbox"/> W1 Rough wood W1.1 Roundwood (logs)	<i>Tectona grandis</i>	Teak
<input type="checkbox"/> W2 Wood charcoal		
<input type="checkbox"/> W3 Wood in chips or particles W3.1 Wood chips		
<input type="checkbox"/> W4 Impregnated/treated wood W4.1 Impregnated roundwood W4.3.1 Treated glued laminated timber		
<input type="checkbox"/> W5 Solid wood (sawn, chipped, sliced or peeled) W5.1 Flitches and boules		
<input type="checkbox"/> Other		

Sustainable rate of harvest of commercial timber/non-timber forest products

Botanical (Latin) Name	Common trade Name	AAC* (m ³)	AACP**	Actual harvest (2021)	Projected harvest for next year (2022)
<i>Tectona grandis</i>	Teak	N/A***		1004.968m³	9246 m³
Total					

* Approximate annual allowable cut (AAC) of commercial timber (cubic meters of round wood) by species

** Approximate annual commercial production of non-timber forest products, by product type.

***All harvest are from thinning. Actual harvest will commence at the end of the 20th cycle. The plantation is currently in the 13th year considering the 2008 when actual planting took until 2012.

In 2021 1005m³ was harvested. This is less than the expected 4608 m³. However this was only caused by a delay of several months. Most of this volume was harvested early 2022. As a part of the plantation reaches the stage of the end cut the amounts have increased compared to previous years. Permits for harvesting could be provided, as well as evidence of benefit sharing.

Stratification of Form Ghana's Planation as follows

Planting Year	Planted Area (Ha)	Planted with Teak	Planted with Indigenous Species
2001	66.09	53.76	12.33
2006	107.48	91.41	16.08
2008	171.52	148.16	23.36
2009	609.03	512.57	96.42
2010	713.36	612.51	100.86
2011	986.37	844.32	142.05
2012	793.49	633.12	130.36
Total	3447.34	2925.85	521.49
%	100	84.87	15.13

Source: Addendum to the 2021 Akumadan Management Plan V6

Activity	2020 ha	2021 Ha
Full weeding	1150	2103.587
Chemical weeding	468	369.8
Thinning	728.8	-
Clear fell	-	8.83
Pruning	400	325.32
Fire belt	400	747.45

Assumptions on which estimates are based

Form Ghana has developed silvicultural system based on tree species, performance and on the desired end product. Form Ghana aims at the production of high quality teak saw logs, because of the high revenue prospects. A 20-year rotation cycle for teak was chosen to match this aim. For the indigenous tree species, a suitable rotation length is determined per species. In some spots the trees will not be felled (buffer zones). The system applied by Form Ghana requires intensive plantation management, which is implemented according to best practice.

Thinning regime and harvest estimates are based on yield tables from teak plantations in Ivory Coast, where similar soil and climatic conditions apply. These tables provide growth data over a period of 20 years, based on a specific management regime, including thinning and final felling. The tables are divided in four realistic yield classes based on the dominant height (Hdom) of a stand. The difference between the yield classes in total production potential and mean annual increment is considerable.

It is essential that the Form Ghana tree stands are classified accurately according to their yield class. This categorization is done based on results from growth performance monitoring in Permanent Sample Plots (PSPs), as described in protocol 13. The expected average yield class for Asubima and Afrensu Brohuma FR is class two. This expectation is actualized regularly with results from an intensive monitoring program. The thinning regime suggested for yield class two consists of three thinnings and a final harvest. The first thinning is non-commercial.

Sources of data

1. Yield tables for Teak from Ivory Coast (Reference: Dupuy, B., 1990, *Etudes sur la croissance et la productivité du teck (Tectona grandis) en Cote d'Ivoire – Tables de production*. Centre Technique Forestier Tropical, Abidjan, Cote d'Ivoire.
2. PSP monitoring data (which is done per each sampling plot for all planting years and any other year once in 2 years except the 2001 plantings which is done every year)

Chemical pesticides used within the forest area

Applicability of chemical pesticides: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>								
IF YES, COMPLETE THE FOLLOWING SECTION:								
Trade name	Active ingredient and CAS Registry number*	Classification of HHPs	Quantity of active ingredient used	Period of use	Number and frequency of applications	Location and area of use	Reason for use	Presence of valid FSC derogation
Glyphader	Glyphosate (CAS 1071-83-6)	<input type="checkbox"/> Prohibited <input type="checkbox"/> highly restricted <input checked="" type="checkbox"/> restricted	996 kg	April-July	1 time/year	354.80 ha (young plantations blocks 5,8,9,10)	Weed control	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
Sidon Rondon	Glyphosate (CAS 1071-83-6)	<input type="checkbox"/> Prohibited <input type="checkbox"/> highly restricted <input checked="" type="checkbox"/> restricted	32 kg	November	1 time/year	15 ha (young plantations – block 9)	Weed control	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no

* A CAS Registry Number, also referred to as CASRN or CAS Number, is a unique numerical identifier assigned by the Chemical Abstracts Service (CAS) to every chemical substance. It provide a reliable common link between the various nomenclature terms used to describe substances. Please use the weblink below as well as the latest version of the FSC Lists of highly hazardous pesticides (FSC-POL-30-001a EN) to verify the active ingredients listed in above table. (Link: <https://chem.nlm.nih.gov/chemidplus/>)

In the case of existing approved derogations: .

Type of approved pesticide derogation:

Findings on progress in implementing conditions:

[in this section the data collected by the certificate holder shall be evaluated, and the summary data and results of monitoring shall be reported in this part

Social Information

Number of forest workers (including contractors) working in the forest within the scope of a certificate (differentiated by gender): 242		
# of male workers 164		# of female workers 78
Number of accidents in forest work since the last audit		Serious: 0 Fatal: None

Exclusion of areas from the scope of certificate

Applicability of FSC partial certification		
(i.e. not all forest areas owned or managed by the client is included in the scope of the certificate):		
		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments / Explanation for exclusion:	<p>1. Onyimso Forest Reserve: An area of the forest not owned by From Ghana (Owned by Boakyewaa Enterprises Limited - BEL) is managed under a forest management agreement.</p> <p>2. Tain II: A new degraded forest reserve has been acquired in 2013 a large area of 14,900ha. Planting has commenced since 2013. Plans are in place to incorporate under the certificate in the future - 2025. During the audit of 12/05/2021 was confirmed by the managers that the timing will be respected and all things are going according to the scheduled timing</p>	
Control measures to prevent contamination:	<p>1. Forest area is located in a different forest district and therefore there can be no contamination.</p> <p>2. A new degraded forest reserve in a different location was acquired in 2013. There is no timber yield at present.</p>	
<i>Other FMU</i>	<i>Location</i>	<i>Size (ha)</i>
Onyimso Forest Reserve	Juaso Forest District, Ashanti Region. UTM 33 N 720847 - 742615	100
Tain II	A large reserve near Sunyani - Brong-Ahafo region. 7deg 37m 39.26s N. 2deg 34m 12.22s w	14,900

Land Use History

Prior to the acquisition of the area and development into Teak plantation, the forest reserve has been heavily logged and also been affected by persistent bush fire resulting in complete degradation of the reserve leaving the entire area virtually with no natural forest. The forestry commission of Ghana declared the area a degraded forest reserve and to be leased out for plantation development to restore the land. The management plan, land lease agreement, and stakeholder consultation give evidence to that effect. Interview with relevant stakeholders i.e. elders of Akumadan, the Offinso North District Assembly, and the Offinso Forest Service Division as well as visits to the field also established that virtually no or less indigenous trees specie were found apart from those planted by Form Ghana.

Regional Context

- landscape context:*

The location of the plantations lies in the transition zone between the high forest and savannah vegetation in Ghana. This zone serves as shelterbelt, preventing forest fires from the north to spread down to the south into the high forest zones. There is no natural forest remaining in the area following its degradation. Farmers have encroached the remaining land, however, the area for the plantation has not been encroached. There are few streams that flow through the plantation even though not mainly used by the communities around because of its polluted nature but are fully protected with indigenous trees planted around the streams by Form Ghana for conservation purposes.
- environmental context:*

Continuous overexploitation and wildfire attacks have taken their toll over the past decades in Asubima and Afrensu Brohuma Forest Reserves, plant communities have changed dramatically from dense forest vegetation to savannah grasslands, wildlife declined in numbers and savannah birds thrive at the cost of those birds characteristic for the forest. Despite these drastic changes, a number of birds, mammals, and reptiles still remain, as well as a few indigenous trees. Form Ghana intends to conserve remnant trees and enhance remaining wildlife populations by creating habitat in buffer zones and by controlling all hunting.

and poaching activities. By reforesting the land, Form Ghana expects to restore many of the ecosystem functions that are now degraded or absent. The focus of environmental management is on managing biodiversity, water and soil. The Social and Environmental Impact Assessments conducted for both forest reserves foresee many positive effects of Form Ghana's reforestation activities on biodiversity, soils, hydrology, local climate, and carbon balance. Form Ghana intends to manage its forest plantation in such a way that these positive impacts are optimized and negative impacts are avoided or mitigated. New insights on local ecology, biodiversity or other environmental factors that arise from monitoring will be used to modify strategies for conservation purposes when necessary.

- *social context:*

Labour conditions for Form Ghana employees naturally comply with national legislation and meet all FSC standards. The First Aid Procedures & Emergency Evacuation Protocol (P8) provides guidelines for ensuring health and safety of all Form Ghana employees. Form Ghana has developed good relations with the surrounding communities and will continue to maintain them. In the benefit sharing agreement accompanying the land lease, it is officially laid down how the community benefits from Form Ghana's activities. Form Ghana developed their own social plan describing how Form Ghana deals with employment, training of personnel, intercropping and extension services (see chapter 12). The collaboration with surrounding communities and local farmers is evaluated every year and if necessary adjusted to meet the social goals of Form Ghana. Although farming is not allowed within forest reserves according to Ghana's national law, there were many smallholder farms in Asubima and Afrensu Brohuma when Form Ghana started their activities in 2007. Form Ghana gives these farmers the opportunity to sign intercropping agreement with the company, enabling them to farm legally in between the young teak trees. This benefits the farmers but also the company because the farmers weed around the young teak trees, promoting their growth. After every final felling, land will become available for intercropping. The collection of Non-Timber Forest Products (NTFPs) is restricted to allow regeneration of the severely degraded natural forest areas of Asubima and Afrensu Brohuma FR. Harvesting of locally rare materials such as rattan is prohibited until these species have increased their stocking. Fruits and nuts can be collected freely.

- *economic context:*

Form Ghana aims at the long-term production of high-quality timber, thereby meeting the steady global demand for sustainable roundwood. Since the remaining natural forests in Ghana are in a deplorable state, plantation forests are likely to become even more important to meet this demand in future. To bridge the time until the first harvest of roundwood, expected in 2027, Form Ghana generates income from carbon credits sales and commercial thinning. The first clear fell has recently taken place in a 53.76 ha pilot plantation, planted in 2001 in Asubima Forest Reserve. Subsequently, a total of 1004.968 m³ was produced in 2001 planting area in 2021. Sales from the pilot plantation and the subsequent planting area gives an indication of the value of the younger parts of the plantation. The uneven age character of the plantation due to annual planting will assure periodical revenues from sales of billets and poles.

- *legislative, administrative and land use context:*

The area is owned by Offinso stool land but managed by the Forestry Commission of Ghana because the area lies within the Afrensu Brohuma and Asubima forest reserve. Thereby, the benefits agreement is shared among the stool land, land owners, community members and the FC. Prior to the plantation establishment, the area was a natural forest reserve but was severely logged and also burnt down by persistent bush fires. A formal application was made by Form Ghana to develop plantations as a means of restoring the land following the launch of the National Forest Plantation Development Program (NFPDP) by the FC in 2001. Prior to any harvesting, a team from the Forest Service Division (FSD) needs to conduct evaluation and upon approval, a plantation production certificate (PPC) is given to give legality of the wood. In 2021, a total of 1004.968 m³ was realized from 2001 stand.

4.2 Management system

Management system	Rotation length (years)	Hectares or % of FMU(s) under this management
Even-aged (Clearcut)	20	2925.85 Ha
Even-aged (Shelterwood)		
Other Even aged [if applicable: explain]		
Uneven-aged (individual tree selection)		
Uneven-aged (group harvested) [if applicable – explain]		
Other management system [if applicable: explain]		
Silvicultural prescription:		
The terrain is prepared before plantings are done. Baselines are then marked out and pegging takes place. A few months after planting, beating up is done if the mortality rate is too high. Singling is done thereafter to remove extra stems, depending on the occurrence of multiple stems. Weeding is done 3 times a year before canopy closures, this can include the use of glyphosate depending on the weed pressure. Pruning is done in years 3, 5, and 7 during the dry season to decrease the chance of diseases. Thinning is done 2 to 4 times, depending on the plantation development (4, 8, 12, either 16 or 18). Felling takes place at the end of the rotation, considering optimal market chances and more equal size class distribution in the future.		

4.3 Summary of Management plan

4.3.1 Company background

Form Ghana Ltd. is a forest plantation management company, based in the north of the Ashanti Region, near Akumadan and in the Tain II Forest Reserve near Berekum in the Bono region. The company was established in 2007. The core business of Form Ghana is the restoration of some of Ghana's Forest Reserves as part of the Ghana government's strategic plans for these Forest Reserve areas. This will be achieved through the establishment and management of sustainable forest plantations to restore land, carbon sinks and strategic timber resources and the restoration and protection of indigenous forest areas, in degraded forest reserves. These areas used to be productive semi-deciduous forest ecosystems until overexploitation, bush fires and illegal conversion to agricultural land caused severe degradation of the land and natural resources prior to Form Ghana acquiring management control of the areas.

Form Ghana operates according to its own 'sustainability concept', a unique tool for responsible forest management, designed to balance ecological, social and economic sustainability. The company has been certified to FSC since 2010.

The company's reforestation activities have also been independently validated under the Verified Carbon Standard (VCS). 'Under VCS, projects are issued unique carbon credits known as Verified Carbon Units or VCUs. Each VCU represents a reduction or removal of one ton of carbon dioxide equivalent (CO₂e), which can be generated by reducing or removing greenhouse gases.' (www.v-c-s.org). Form international is a Dutch consultancy company that provides technical assistance to the management of Form Ghana.

4.3.2 The management objectives

The management objectives of Form Ghana are as follows:

1. Establishment and management of sustainable timber plantations;
2. Conservation and regeneration of natural riparian forest in accordance with the land lease requirements and relevant national legislation;
3. Generate sustainable income from round-wood and carbon sequestration;
4. Provide social benefits for employees and surrounding communities.

4.3.3 The forest resources

Land use

Most of the area under the plantation management has been planted with teak; a total of 2925.85 ha (Reference: forest management plan V6). The remaining area consists of buffer zones and indigenous plantation forests. There are a number of streams that run through the plantation. Annual rainfall is 1227 mm with an average temperature of 26 degrees Celsius. Slopes are limited (usually between 5-10%), and only a few outcrops are located in the plantation.

Land ownership and use rights

Asubima Forest Reserve in the Offinso Forest District of Ashanti District – 1667,48 ha leased for a term of 50 years by the Forestry Commission on 4th March, 2009.

Afrenso Brohuma Forest Reserve in the Offinso Forest District of Ashanti District – 1779,86 ha leased for a term of 50 years by the Forestry Commission on 4th March, 2009.

Both lands are managed under a benefit sharing agreement where the investor (Form Ghana) receives 90% of the Standing Tree Value (STV) of commercial thinning and final harvesting from commercial forest plantations and is also entitled for all food crop proceeds. The remaining 10% is paid to the Forestry Commission of Ghana to be shared among the various parties involved in the benefit sharing agreement as follows; Land owner (Omanhene of Offinso Traditional Council) receives 6%, the Forestry commission receives 2% and the Local community (District Council Offinso North) receives the remaining 2%.

Socio-economic conditions

Extensive social assessments have been done by Form Ghana in Asubima and Afrensu Brohuma Forest Reserves, in 2008 and 2012 respectively and has been publicly made available on its website. An annual social survey is undertaken by Form Ghana to maintain consultations with surrounding communities and individual farmers. These results are included in the annual monitoring reports.

Both reports do not identify any major negative impact from the activities of the company except Afrensu Brohuma FR where some community members thought their livelihood where being taken away with the presence of the company and possible ejection from their farmlands, even though they were very much aware their occupancy on the land was illegal. However, the opportunity was offered them in the early years of the plantation to undertake intercropping activities in the plantation with conditions and could leave once the plantation takes cover. On the part of Asubima FR, the community saw the presence of the company as positive since they could have job to do and also help them in fighting the persistent bush fires in the area.

Forest composition

Both Reserves (Asubima and Afrensu Brohuma) are made up of 2925.85 ha of production plantation – (Teak), with 521.49 ha being conservation and protection purpose.

Profile of adjacent lands

The surrounding area is either Forest Reserve or land owned by farmers. The Forest Reserve has been encroached by farmers; no natural forests are found next to the plantation. Block 15, 16 is bordering to teak plantations owned by Unity Afforestation Company.

4.3.4 Management structures

Management structure and division of responsibilities

In Akumadan, Form Ghana currently has a workforce that consists of up to 242 people. However, the number varies with the season as the seasonal weeding and pruning work makes it necessary to employ extra people. Form Ghana is managed by the Managing Director. The Akumadan site is managed by the Plantation Manager. He directs a team consisting of a Nursery Supervisor, Monitoring Manager, Head of Security, Stores Manager, a Nurse, and Workshop Manager. They in turn direct the teams or team leaders who are each responsible for a team. Below shows the organizational structure of the company (Form Ghana – Akumadan).

See forest management plan V6 for organogram.

Structure of FMUs

The plantation is divided into age blocks. Depending on the need, work takes place, including weeding, road construction and maintenance, and fire protection.

Use of contractors

Contractors are hired by the company on a seasonal basis when the workload is high mainly for weeding activities and during the dry season when fire is rampant. They are hired individually but work together as a group. There is a foreman who is employed by the company to supervise the work of these groups.

Provision of training

All employees both permanent and contract staff, go through annual training organized by the company depending on one's responsibilities. Workers also get job briefing before work begins on daily basis. A training need and plan (training matrix) is designed for all workers in the company. Training matrix for 2019, 2020 and 2021 as well as training register with list of workers trained on various training needs including; firefighting, the company's internal rules and regulations, grievance handling and redress, marking for thinning, PSP monitoring, security, chainsaw operation, work ethics, etc. were seen and verified. Staff interviews confirmed training received from the company.

4.3.5 Silvicultural and/or other management systems being implemented

Harvesting techniques and equipment used

Harvesting will be done after the end of the 20year cycle, where all remaining trees will be harvested. This may change depending on market development. The establishment of the new plantation will be done by planting new seedlings/stumps, not through coppicing. Therefore, the terrain preparation will apply for all rotation cycles to come. Most works in the plantation are done manually, including planting and weeding.

Rationale for species selection

The economic viability of Teak in Ghana and in the Ashanti region is very much appreciable than indigenous and other exotic tree species. Teak is less prone to diseases and it is more enhanced when proper site selection is done for the plantation development. Thereby, no or fewer chemical treatments are required for pest control.

Road layout and construction

Road network in the plantations is nicely constructed and maintained to prevent erosion and blocks. Accessing the plantation blocks is easy due to the good nature of the roads and the interconnecting nature.

4.3.6 Environmental safeguards

A vegetation strip of 30m on each side of rivers and streams is conserved. These “buffer zones” are developed into natural forest. In some areas of the buffer zones, the stocking of trees was low, or trees were completely absent. In order to assist natural restoration of these areas, Form Ghana has planted indigenous trees. The local species originate from Ghana and are in most cases locally sourced in order to maintain the genetic integrity of the local forests. The Social and Environmental Impact Assessments conducted for both forest reserves foresee many positive impacts of Form Ghana’s reforestation activities on biodiversity, soils, hydrology, local climate and carbon balance. Form Ghana intends to manage their forest plantation in such a way that these positive impacts are optimized and negative impacts are avoided or mitigated. New insights on local ecology, biodiversity or other environmental factors that arise from monitoring are used to modify strategies for conservation purposes when necessary.

4.3.7 Management strategy for the identification and protection of rare, threatened and endangered species

The company has conducted HCV assessment in 2013 and reviewed the report 2019 and it shows the absence of HCVs in the reserve. However, monitoring activities takes place to identify species with any protection status. Aside the 5year full monitoring, additional monitoring reports has been developed to analyze presence of birds, mammals, butterflies etc.

The company is working on a strategy to monitor fauna more efficiently. Flora monitoring is done annually, including the monitoring of rare, threatened and endangered species.

4.3.8 Monitoring procedures

Form Ghana commits itself to different types of monitoring: Biodiversity, Forest Condition, Water Quality, Forest Production, Economic Aspects and Social Benefits. Applied methods of monitoring depend on the purpose of each monitoring activity. These methods are described in protocol 13, per monitoring type.

Every year, a monitoring plan is developed, including all monitoring activities that are expected for that year. Included in the monitoring plan is a list of indicators and verifiers that Form Ghana adheres to. In addition, analysis is done on the monitoring data on forest condition, measured in permanent sample plots (PSPs). These analyses are recorded in an annual PSP Monitoring Report. All other monitoring activities are recorded in an Annual Monitoring Report. Results from the monitoring activities are processed and used as input to improve Form Ghana’s management.

5. Standards

5.1 Standards used

The standard used for the main assessment is the **Ghana Forest Management Certification Standard 2012 v5**. This standard(s) can be found as an Annex to this report (Annex I) and is also available on the website of CUC (<http://certification.controlunion.com>) It can also be provided by CUC on request.

Where applicable, CUC shall use the standards in combination with other FSC requirements, such as “Requirements for use of the FSC trademarks by Certificate Holders” (FSC-STD-50-001 V2-0), “FSC Standard for group entities in forest management groups” (FSC-STD-30-005 V2-0), FSC Policy on “The excision of areas from the scope of certification” (FSC-POL-20-003 V1-0), FSC Policy on “Partial certification of large ownerships” (FSC-POL-20-002 V1-0) and FSC Pesticides Policy(FSC-POL-30-001 V3-0). All these documents can be downloaded from the FSC website (<https://fsc.org/en/document-centre>) or can be provided by CUC on request.

5.2 Adaptation of the standard

Not applicable.

6. The evaluation process

6.1 Audit team and qualifications

Qualifications	Bernd Slesazek	Lead auditor
	Forest management expert with a MSc in Forest and Nature Conservation at Wageningen University, with more than 10 years' experience in auditing forestry and timber industry operations across 4 continents. Experience includes training, programme management and (internal) assessments for PEFC and FSC. Bernd is also a qualified Senior Auditor (ISO 9001)	
	Emmanuel Esoah	Auditor in training, and local expert
	BSc Natural Resources Management (Silviculture and Forest Management Option) from Kwame Nkrumah University of science and Technology coupled with a broaden horizon of exposure which emanates from skills in CQI/IRCA ISO 9001:2015, Rainforest Alliance, Organic, FSC, HACCP plus Blommer, Touton Cocoa and Nestle standards of Monitoring and Evaluation, in Ghana Sierra Leone and La Cote'd Ivoire. Twelve (12) years' experience in the cocoa sector, and 4 years' experience in the Forestry and Timber Industry of Ghana.	

6.2 Description of surveillance audit

Audit method, including approach to evaluation of management systems

The Ghana Forest Management Certification Standard 2012 v5 was used to assess Form Ghana's compliance. For the purpose of this surveillance-evaluation, the samples of principles and criterion were used to assess Form Ghana's compliance to the FSC standard.

The audit began with document review using shared screen, shared files and video calls with the management. The audit team could interview a range of staff members, including workers and supervisors of different teams, union representatives, neighbors and other stakeholders. Staff and management were interviewed to establish their level of knowledge about the work. Harvesting and patrolling could be observed during the field visit. The general condition of the plantation could be observed, linking the planned and executed activities with the condition of the plantation, and the knowledge of the management and responsible staff. After the field visit more species interviews and documents were reviewed during remote interviews using videocalls and document sharing.

Relevant stakeholders were consulted all through the audit period where necessary. The rational for the consultations, was to establish Form Ghana's compliance regarding the FSC standards, the local rules and regulations within its jurisdiction.

Itinerary

Date 2022	Time	Activity	Sites, Location (remote audit)	Persons present (see annex III for full list of names)
14-3	10:00 -11:00	<u>Opening meeting</u> -discuss scope, status NCs, -conform no changes (area, management system, regulations), -conform no complaints or serious accidents since last audit -Finalize Audit Plan with Client. -plan field visit 16-3 (locations, people, stakeholders)	Remote	Management team -Plantation Manager (Akumadan Plantations) -Plantation Manager (Berekum Plantations, previously Akumadan) -Managing Director FORM Ghana -Forest Manager FORM Ghana -Monitoring Officer FORM Ghana (director, responsible of certification, responsible of plantation management (old and new)) Lead auditor, team member
	11:00 -12:00	<u>Introduction and review of Management structure and documentation:</u> -management system: departments and responsibilities as relevant for the audit, -management system documentation, -summary of working plan 2022 -management review (internal audits and reporting); -review competencies and training	Remote	Same
	13:00 -17:00	<u>Document reviews</u> -complaint records and follow-up; -Stakeholder communication and follow-up; -accident records and follow-up; -pesticide use records (ESRA, use records, monitoring records, training) -CoC: records of total sales 2021, planned harvest 2022, sales and transport documentations -pre- and post-harvesting monitoring records (and related evaluations and training) HCV : -Follow-up on NC on HCV (HCV assessment, management plan), Finalize planning Wednesday	Remote	Same
16-3	All day	Virtual field visit Interviews workers, contractors, management, stakeholders through virtual company tour	Plantation (Outside of the plantation FORM properties: -storage -camp facilities)	-Union representatives -Forestry Commission -Offinso Stool Land -Plantations managers (old and new) -Monitoring Supervisor -Human Resource -Security Management Workers different teams: -Security -Harvesting team (incl. -Chainsaw Operator) -E&S

				-RRT -Rapid Respons Team *Local auditor
22-3	9:00 -13:00	Remote interviews and document review (follow-up day 1 and 2), including: -budget, financial legal aspects -management plan review	Remote	Management Audit team
29-3	13:00 -15:00	Discussion final topics and review documents.	Remote	Management Audit team
29-3	15:00 -17:00	Closing meeting	Remote	Responsible persons management Audit team

Main management aspects reviewed by the audit team

Type of site	Number of sites visited	Type of site	Number of sites visited
Archeological site		Permanent monitoring site	2
Bridges/stream crossing	2	Planned Harvest site	
Buffer zone	2	Planting	
Chemical storage	1*	Pre-commercial thinning	
Clear-cut/Clear felling		Recreational site	
Commercial thinning	1	Riparian zone	2
Completed logging	1	Road construction	
Cultural/religious site		Sanitation cutting	
Direct seeding		Selective felling	
Endangered species		Shelter wood management	
Erosion/Steep slope	2	Skidding/Forwarding	
Felling	1	Soil drainage	
Historical site		Soil scarification	
Illegal settlement(s)		Special management area	1
Key Biotope		Tree nursery	1*
Local/indigenous community	1*	Weed control	1
Logging camp	2*	Wetland	
Natural regeneration		Wildlife management	
Nature Reserve		Workshop	1*
Ongoing Harvest site			

*outside the certified area

Additional techniques used for surveillance

Videocalls, virtual company tour and document sharing online.

Total number of person days spent on the surveillance audit): 6 days

(=number of auditors and technical experts participating X number of days spent from opening to closing meeting*)

*: including stakeholder visits, but excluding document review, travel to and from the region, stakeholder consultation process and reporting,

Lead auditor 3

Audit team member 3

6.3 Stakeholder issues

FSC Principle	Stakeholder comment	CUC response
1 - Compliance with laws and FSC principles	Positive feedback received from legal authorities.	-
2 - Tenure and use rights and responsibilities	No concerns raised by stakeholders	-
3 - Indigenous peoples' rights	Positive feedback received from stool representatives.	-
4 - Community relations and workers' rights	Positive feedback received from workers and local people. Point of attention was raised regarding a high number of open issues which are being addressed.	No direct concerns identified, as the topics raised are part of the process of exchange of information and improved registration of these comments.
5 - Benefits from the forest	No comments received.	-
6 - Environmental impact	No comments received.	-
7 - Management plan	No comments received.	-
8 - Monitoring and assessment	No comments received.	-
9 - Maintenance of high conservation value forests	No comments received.	-
10 - Plantations	No comments received.	-
Chain of Custody	No comments received.	-

7. Observations

7.1 Non-conformities and Corrective Action Requests

Minor non-conformity:

- it is a temporary lapse, or
- it is unusual/non-systematic, or
- the impacts of the non-conformity are limited in their temporal and spatial scale, and
- it does not result in a fundamental failure to achieve the objective of the relevant FSC Criterion or another applicable certification requirement.

Minor non-conformities shall be corrected within one (1) year (under exceptional circumstances within two (2) years).

Major non-conformity:

A non-compliance shall be considered major if, either alone or in combination with further non-conformities, it results in, or is likely to result in a fundamental failure:

- to achieve the objective of the relevant requirement of the relevant FSC Criterion, or
- in a significant part of the applied management system.

The cumulative impact of a number of minor NC's may represent a fundamental failure or total breakdown of a system and thus constitute a major NC.

Fundamental failure is indicated by non-conformity which:

- continues over a long period of time, or
- is repeated or systematic, or
- affects a wide area and/or causes significant damage, or
- is indicated by the absence or a total breakdown of a system, or
- is not corrected or adequately responded to by the client once identified.

Major non-conformities shall be corrected within three (3) months (under exceptional circumstances within six (6) months).

The occurrence of **five (5) or more major non-conformities** in one surveillance audit shall be considered as a total breakdown of the certificate holder's management system and in those cases the certificate shall be suspended.

In the cases of previously closed NCs being repeated in the subsequent evaluations against the same standard indicators it will be considered in grading the NCs.

Note: Repeated' means that the same root cause that already resulted in a nonconformity in a previous audit has been re-detected as a reason for a nonconformity in a following audit within the same 5-year certification period/cycle. This is usually indicated by a nonconformity with the same indicator / requirement than in a previous audit.

7.1.1 Overview of non-conformities identified at previous evaluation

Below an overview is given of the actions taken by the client/certificate holder to correct any NC's identified at previous evaluations or subsequently and have remained with the status "open" since the last audit. All NC's identified at previous evaluations or subsequently that have already been closed before can be found in previous evaluation reports.

For each NC a description of its current status is given. In the case a minor NC has not been settled within the given timeframe (i.e. the certificate holder has either not met or has partially met the Corrective Action Request – CAR), it has been upgraded to a major NC. If a major NC has not been settled within the given timeframe, the certificate shall get suspended.

Nº NC: 2021-01	Standard Indicator: FSC-STD-GHA-01-2012: 9.1.1	Category: <input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR
Date found: 14-05-2021	Deadline for correction: <input type="checkbox"/> Prior to (re-issuance of certificate) <input type="checkbox"/> 3 months from closing meeting <input checked="" type="checkbox"/> 12 months from closing meeting	
Description of indicator: The results of assessments specified in Indicator 6. 1.1. shall be analysed to determine the presence of High Conservation Value attributes, as defined in the FSC Glossary.		
Description of non-conformity: Not all HCV attributes were properly identified in the HCVstudy rev 2019. Objective evidences: HCVF analysis was carried out on 2019 and this document didn't identify any RT&S species or red list species. However, the document "Biodiversity monitoring report 2021" recently received, refers that some RT&E species like snakes and mammals were recorded, and even a dwarf crocodile, a CITES red-list species, was sighted in Afrensu Brohuma Forest Reserve. Based on this emerged that the HCV report rev 2019, indicating no presence of HCV nr.1 and nr.3, needs to be up date according to the Biodiversity monitoring report 2021. This NC is considered minor since all other HCV attributes were properly investigated and recorded		
Corrective action request: It shall be guaranteed that this NC is corrected, and corrective action(s) has/have been carried out on the causes of this NC to minimize recurrence [in exceptional cases additional text may be added to this CAR, provided that no advice is given]		
Evidence received, and analysis of corrections and corrective actions provided for NC closure:		
Root cause analysis:	At the time of the audit, there was a new biodiversity monitoring report received (published 2021). The restoration of species identified in the report had not been considered in formal assessments and management plan reviews.	
Extent analysis:	Updating HCV assessment based on new monitoring data which include several Rare Threatened and Endangered species	
Correction:	HCV assessment has been updated based on new data (regarding biodiversity)	
Corrective and preventive actions:	Future formal biodiversity monitoring and HCV assessments review will be aligned to ensure HCV assessments Reviews follow after biodiversity monitoring.	
Documents verified:	-Updated HCV assessment -NC assessment of NC 2021-01 by FORM dated 19-5-2021	
Proposal assessment:	Close NC. Correction (updated HCV report) and corrective measure (ensure future HCV assessment contain latest biodiversity reports by improved planning) are implemented and address the identified root cause.	
Status: Closed (29-03-2022)		

7.1.2 Identified non-conformities during present evaluation

Non-conformities (NC's) identified during this Surveillance evaluation are listed below. In case the client has provided sufficient evidence during the audit process (i.e. before the report was closed), the status of the NC is set on closed. In all other cases the NC has to be closed within the given timeframe.

Each element (indicator) of the Standard is evaluated by means of a checklist. Please refer to the annexed checklist for details (Annex 1, confidential part).

Nº NC: 2022-01	Standard Indicator: FSC-STD-50-001: 1.4	Category: <input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR
Date found: 19-03-2021	Deadline for correction: <input type="checkbox"/> Prior to (re-issuance of certificate) <input type="checkbox"/> 3 months from closing meeting <input checked="" type="checkbox"/> 12 months from closing meeting	
Description of indicator: TMK 1.4: The FSC logo and the 'Forests For All Forever' marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered. The symbol ® shall also be added to 'FSC' and 'Forest Stewardship Council' at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure). For use in a country where the trademark is not yet registered, use of the symbol TM is recommended. The Trademark Registration List document is available in the FSC trade-mark portal and marketing toolkit.		
Description of non-conformity: On the website and several public documents the trademark symbol is missing after the first mentioning of FSC™ or Forest Stewardship Council™.		
Corrective action request: It shall be guaranteed that this NC is corrected, and corrective action(s) has/have been carried out on the causes of this NC to minimize recurrence [in exceptional cases additional text may be added to this CAR, provided that no advice is given]		
Evidence received, and analysis of corrections and corrective actions provided for NC closure:		
Root cause analysis:		
Extent analysis:		
Correction:		
Corrective and preventive actions:		
Documents verified:		
Proposal assessment:		
Status: OPEN		

Nº NC: 2022-02	Standard Indicator: FSC-STD-50-001: 1.5	Category: <input type="checkbox"/> MAJOR <input checked="" type="checkbox"/> MINOR
Date found: 19-03-2021	Deadline for correction: <input type="checkbox"/> Prior to (re-issuance of certificate) <input type="checkbox"/> 3 months from closing meeting <input checked="" type="checkbox"/> 12 months from closing meeting	
Description of indicator: The organization shall either have an approved trademark use management system in place or submit all intended uses of FSC trademarks CUC for approval. Please see Annex A for further information on trademark use management system.		
Description of non-conformity: New trademark usage on the website and published document has not been approved by Control Union. The procedure is complete, however, it is unclear: -who can add FSC trademarks to external documents (reports) -who shall check trademark use is approved by Control union before publishing -where logo-approval from previous or currant usage is stored. -the correct statement of trademark symbol and licence number - FSC™ (FSC-C044035) and/or Forest Stewardship Council™ (FSC-C044035) – could not be observed on all documents.		
Corrective action request: It shall be guaranteed that this NC is corrected, and corrective action(s) has/have been carried out on the causes of this NC to minimize recurrence [in exceptional cases additional text may be added to this CAR, provided that no advice is given]		
Evidence received, and analysis of corrections and corrective actions provided for NC closure:		
Root cause analysis:		
Extent analysis:		
Correction:		
Corrective and preventive actions:		
Documents verified:		
Proposal assessment:		
Status: OPEN		

7.2 Observations

Observations:

The early stages of a problem which do not of itself constitute a non-conformity, but which the auditor considers may lead to a future non-conformity if not addressed by the client. Therefore an observation concerns a warning signal on a particular issue that, if not addressed, could turn into an NC in the future.

Nº OBS: 2022-01	Standard indicator: FSC-STD-GHA-01-2012 4.2.5 Managers/Contractors shall ensure that workers use safety gears and equipment that are provided.
Date found: 29-3-2022	
Description of observation: There is a functioning system in place to provide and monitor the provision and usage of required PPEs. To further ensure the minimum quality is guaranteed over time, workers could be ensured that replacement of worn out PPEs takes place in time, as well as monitoring the proper use and condition of PPEs. Especially PPEs that are planned to last for a longer period (e.g. 2 planting seasons).	

Nº OBS: 2022-02	Standard indicator: FSC-STD-GHA-01-2012 6.6.3 Environmentally friendly means of pest and weed control shall be adopted wherever possible. Chemicals shall be used only where there is no existence of known non-chemical alternative or entails excessive cost or an unrealistic expenditure of resources. Based on: FSC-POL-30-001 V3-0 EN : 4.12.9 Have programs in place, according to SIR, to research, identify and test alternatives to replace FSC highly restricted HHPs and restricted HHPs with less hazardous alternatives. Programs shall have clear actions, timelines, targets and resources allocated.
Date found: 29-4-2022	
Description of observation: Documentation regarding the efforts conducted to research, identify and test alternatives for the use of glyphosate can be strengthened, to enable review of the effectiveness of the strategy to reduce chemical use over time.	

7.3 Issues hard to assess

None identified.

7.4 Possible issues related to the adaptation of the locally adapted standard

(only applicable in case a CUC locally adapted standard has been used)

Not applicable.

7.5 Complaints

No complaints identified.

8. Certification proposal

8.1 Statement

The forest management system, procedures, and techniques of **FORM Ghana Limited** have been assessed by CUC according to the standard(s) described in chapter 5 of this summary. In the opinion of the lead auditor:

FORM Ghana Limited is in continued conformity with the certification requirements (all NC's are closed), and certificate should be maintained

FORM Ghana Limited is in conformity with the certification requirements, and certificate should be maintained provided that open NC's are closed within the given timeframes as mentioned in section 7.1

FORM Ghana Limited is not in conformity with the certification requirements and certificate should be suspended

Note: the occurrence of five or more major non-conformities in one surveillance evaluation shall be considered as a total breakdown of the company's management system and the certificate shall be suspended.

Date of certification: 19-01-2010

Expiry date of certificate: 18-01-2025

8.2 Conditions for certification

Once certified, **FORM Ghana Limited** will be audited at least annually to monitor its continued conformity with all applicable certification requirements. **FORM Ghana Limited** will also be required to fulfill all the corrective actions (if applicable) within the given timeframes, as mentioned in section 7.1.