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# **ASI Final Assessment Report**

FSC ACCREDITATION PROGRAM				
Preferred by Nature OÜ - FSC Assessment				
FSC FM/COC				
Bulgaria - April 06, 2022 to April 08, 2022				
Assessment No. A-20210845548				
Drafted by:	ASI Assessor	April 08, 2022		
Reviewed by:	Technical Reviewer	May 10, 2022		
Finalized by:	ASI Assessor	May 18, 2022		
Signed off by:	Program Manager	May 18, 2022		

## Description

CAB Preferred by Nature OÜ

Accreditation Code ASI-ACC-066

Technical Scopes of Accreditation FSC FM/COC

Geographical Scopes of Accreditation Worldwide (excluding Belarus and Russian Federation)

Type of Assessment Compliance
Technical scope of this assessment FSC FM/COC

Site Visited Sliven

Applicable Standards FSC-STD-20-006 V3-0 FM SH Consultation; FSC-STD-20-007 V3-0 FM Evaluations; FSC-

STD-20-007a V1-0 Cert reports;FSC-STD-20-007b V1-0 Public Summary;FSC-STD-20-001

v4-0 General Requirements CAB

Checklists used

**Objective** The purpose of this assessment is:

1. Evaluation of the Conformity Assessment Body's performance in implementing their Certification system in accordance with all relevant Accreditation Requirements.

2. Verification of the adequacy of the Conformity Assessment Body's previous audit methods, findings and conclusions, and resulting certification decision, through an evaluation of the Certificate Holder's conformity with applicable certification requirements; in this case,

certification standard(s) XXXX.

3. Evaluation of stakeholder comments or complaints received by ASI in relation to this

Conformity Assessment Body and/or operation, if applicable.

4. To provide a conclusion in the final Assessment Report as to whether the evidence from the Assessment supports either recommending awarding, maintaining, suspending,

extending or reducing Accreditation.

Assessment language English					
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#### Certificate Holder Background

The certificate holder (CH) NC-FM/COC-026715 is a state forest management composed of 9 FMUs, of 140,000ha, in southeastern Bulgaria.

Some FMUs are also state hunting units, with this as main objective of management. The right to hunt is determined in accordance with national legislation and permits are issued to local associations and to contractors. The composition of the forest habitats is dominated by seminatural Mediterranean oaks and a mosaic of introduced conifers in mixed coniferous-deciduous stands. Local communities have traditional rights to collect herbs, fruits and mushrooms for personal use free of charge. The CH sells roundwood and fuelwood locally and nationally. Part of the territory of the FMU is bordering a Nature Park. The FM includes Natura 2000 sites. The FM has identified HCVs categories except HCV 5. The complaint related to the Incident had been evaluated by the CH and by the CAB.

#### **CAB Background**

NEPCon OÜ trading as Preferred by Nature (NC, the CAB) is registered in Estonia. It is established and owned by Danish non-profit association NEPCon ("Danish NGO"). The NEPCon is managed by the Board of directors which consists of 7 members. The Executive Director is responsible for the daily management of NEPCon and reports to the Board of Directors. Senior Management includes six directors along with the Executive Director. The main division relevant to this CAB's FSC accreditation is NEPCon Assurance. The CAB obtained its first FSC accreditation in October 2014. The current accreditation scope includes FSC Chain of Custody and FSC Forest management certification worldwide. NEPCon has established several legal entities worldwide that are all owned by the Danish NGO. The organizational structure is based online management where the ultimate responsibility is on the central office in Estonia instead of regional distribution of responsibilities. This FM CH is managed by NEPCon Bulgaria EOOD. As per FSC database at the time of this report, the CAB manages 16 active FM/COC certificates in Bulgaria.

The CAB had conducted the fourth surveillance on 7-9.09.2021, with an audit duration of 6 auditor days (3 days with a team of two), considered sufficient given the size and scale of the company and its operations. During the audit, the auditors had verified documentation and conducted forest field visits in three FMUs, focusing on FSC mandatory criterias and principles 5 and 7 (see ASI findings).

The CAB has raised 3 major NCs and 7 minor NCs.

#### **ASI Assessment**

ASI conducted this onsite compliance assessment with a team of an assessor and a translator/expert. The audit was conducted according to the FM certification standard FSC-STD-BGR-01-2016 Bulgaria Natural Forests Plantations and SLIMF, following the audit trails and field visits of the last CAB surveillance.

Prior to the on-site assessment, the CAB provided the ASI assessor with the last audit reports from 2020 and 2021 and the CAB auditor handbook. The CAB delivered these documents in a timely manner. Further information was requested and obtained during the assessment. The compliance assessment was linked to an incident IN-2181 of 2019, with indication of unauthorized road construction in one of the FMUs. ASI team visited the FMU and the site. The incident had been followed up by CH and CAB and can be closed.

A stakeholder consultation was conducted and one comment was received.

The assessment began with an opening meeting led by the ASI assessor where the objectives and scope of the assessment and the assessment plan were discussed. Three FMUs were visited, with introduction to the assessment and short feedbacks everytime. The itinerary is



detailed in the section Assessment Agenda Items. When the assessment was completed, the (https://www.asi-assurascessed (கம்)ducted a closing meeting with the CAB auditor, where preliminary
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assessment findings were presented and discussed. At the end an overall feedback meeting

was given to the CH, also thanking them for their time, cooperation with the ASI team and Contact us (https://www.asi-assyrance.org/s/contact) hospitality.

At the closing meeting with the CAB, ASI raised one nonconformity, because there was no record of evidence available to ASI, that the CAB has evaluated conformity at the indicator level in the previous surveillances (see ASI findings).

A summary of findings was submitted to the CAB and comments in the Errors of Fact was submitted for the ASI finding. Following ASI TR the finding was waived.

Positive Feedback ASI assessor remarks the CAB cooperation with ASI before and during the compliance

assessment.

Conclusions The conclusion of this compliance assessment is to maintain the accreditation of NEPCon for

FSC FM/COC certification, subject to timely closure of the finding raised.

### Agenda

Date	Time	Activity	Location
April 06, 2022	10:00	ASI/CAB opening meeting	TBD
April 06, 2022	10:30	ASI/CH introduction meeting	CH office Sredets
April 06, 2022	06:00	Travel Sofia-Sredets	
April 06, 2022	11:00	Document evaluation, field trip planning, interviews, field trips within Sredets unit: black pine group felling, workes interview, oak coppice to high stand, Hungarian oak National Registry seed plot, oak afforestation on 2011 pine stand fire, thinning, Natura 2000 site.  Sections: 220, 222, 228, 220i, 220n, 220b, 220v, 220g, 318, 227d, 328a  Focus on FSC Criteria evaluated on CAB last surveillance	CH office/field Sredets
April 06, 2022	17:00	Travel to Burgas	
April 07, 2022	08:30	Document evaluation, field trip planning, interviews, field trips within Tsarevo unit: new harvest 2021, wetland, roadwork site related to incident, game management sylviculture, recent fire, post harvest monitoring, NTFP reed collection site.  Sections: 191, 104/1, 292z, 295/3, 290a, 191d Focus on FSC Criteria evaluated on CAB last surveillance	
April 08, 2022	08:30	Document evaluation, interviews, within Ropotamo unit. Focus on FSC Criteria evaluated on CAB last surveillance	CH office Ropotamo

<b>₽at</b>	Time	Activity	Location
08, 20 <b>2</b> 2	14:00 Contac	(https://www.asi-assurance.org/s/) About Services Engage Resources ASI/CAB closing meeting t us (https://www.asi-assurance.org/s/contact)	Newsroom CH office Ropotamo
April 08, 2022	15:00	ASI CH feedback meeting	CH office Ropotamo

# Opening meeting

In the opening meeting the Assessment scope and plan were confirmed. The conformity assessment body (CAB) was also advised that:

- The assessment scope and plan will be reviewed on an ongoing basis. If changes are needed these will be communicated to the CAB.
- All information is treated in confidence and assessment records are held securely.
- A Summary of Findings (SOF) will be shared with the CAB within 5 calendar days of the closing meeting.
- The CAB will be given 10 calendar days to identify and file Errors of Fact (EOF).
- The final Assessment Report may be shared with the respective Scheme Owner (SO) and/or may be made public as stipulated in the SO requirements or Assurance Service Agreement.

## Closing meeting

At the conclusion of this Assessment, a closing meeting was held. The ASI Assessor summarized the following:

- The ASI assessor shall confirm if all planned assessment activities have been carried out. If not a follow-up course of action will be agreed.
- The Assessment results were obtained by taking a sample. Therefore, not all Nonconformities (NCs) may have been identified.
- Assessment results are recorded in the Summary of Findings (SOF). A copy will be forwarded to the CAB within 5 calendar days of this closing meeting. The findings presented in the SOF should normally not differ from those presented in the closing meeting. There may be instances where there may be differences between the findings presented at the closing meeting and in the SOF. For example if a repeat finding is identified.
- The CAB has 10 calendar days from the date of issuance of the SOF to file Errors of Fact (EOF).
- The final Assessment Report will be issued to the CAB within 40 calendar days of the closing meeting. The number, wording, normative reference, and grading of findings may change following ASI technical review.
- The CAB should inform ASI of any potentially confidential information contained in the ASI report that should not be placed in the public domain.
- The Assessment Findings Procedure (ASI-PRO-20-106) should be followed by the CAB when responding to ASI findings, including associated deadlines and implications due to grading.
- If the CAB disagrees with the findings presented in the final Assessment Report, you may appeal the decision in accordance with the ASI Appeals Procedure (ASI-PRO-20-103).

### ASI Stakeholder consultation

nary of Issues raised by Stakeholders	ASI response			
(https://www.asi-assurance.org/s/)  FMU sa evo: they are supportive towards the protection of the Silistar protected site in the last two years. Examples: for sters react adequality in cases of single site, such as vehicles protection regimes of the protected site, such as vehicles entering without permission, or vehicles parked on sand dunes within the protected site. Also, just a few days ago there was a forest fire in the area of Silistar and foresters reacted promptly and adequately. This is all to my knowledge that I consider relevant to your question.	Services	Engage	Resources	Newsroon

# **Findings**

No findings were raised in this assessment.

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