

# SCS Complaint Investigation Report

---

*Complaint Lodged by Lost Coast League, et al,*

*Against*

*Humboldt and Mendocino Redwood Companies*

*FSC Forest Management Certificate Number: SCS-FM/COC-00120N*

**Original Complaint Submitted to SCS Global Services on 31 July 2018. Supplemental submissions<sup>1</sup> were received by SCS on 11 September 2018 and 25 September 2018.**

Full copies of all documents received by the complainants are maintained in the project file at SCS Headquarters.

**A SCS Complaint Investigation Plan was submitted to Lost Coast League, et al, (contact person: Ellen E. Taylor on 8 August 2018. The Investigation Plan is appended to this Investigation Report.**

In a written complaint signed by Ellen E. Taylor of the Lost Coast League on behalf of a coalition of organizations and individuals<sup>2</sup>, the complainants presented arguments and evidence in support of two main issues: “logging of previously un-entered forest stands and the extensive use of herbicides through the hack and squirt method as well as foliar application.” Upon receipt of the written complaint, SCS determined that it was appropriate to consider the Lost Coast League as the “lead complainant” and that, as a group, the complainants would be referred to as “Lost Coast League, et al.” SCS utilized Ms. Taylor as the main point of contact with the complainants.

A complaint investigation plan was conveyed by SCS to the complainants on August 8, 2018. Robert J. Hrubes was designated as the Lead Investigator for the complaint. Since the complaint was filed roughly one month in advance of the annual surveillance audit for HRC/MRC, for which Dr. Hrubes had already been designated as the Lead Auditor, the complainants were informed (in the Complaint Investigation Plan) that the allegations would be investigated as part of the scheduled annual surveillance audit. Two

---

<sup>1</sup> Written, face-to-face, and telephonic.

<sup>2</sup> Approximately 95 individual names are listed in the 31 July 2018 submission as signatories to the complaint.

members of the annual audit team were designated as additional members of the complaint investigation team: Dr. Joe McBride and Dr. Gary Dodge.

In response to a request from the complainants, plans were made for the complaint investigation team to meet with 8 LCL members on Tuesday, September 11, in order to travel to the Rainbow Ridge area within the Mattole Watershed for the purpose of observing first hand and discussing, in situ, the alleged non-conformities to the FSC Standard that are the focus of the LCL et al complaint. The meeting with the LCL members began and ended at the HRC office in Scotia. Including travel to and from Rainbow Ridge, the 3 complaint investigators and 8 complainants spent approximately 7.5 hours together. Additional written materials were provided by participants in the field trip to the complaint investigators at the end of the joint field visit.

Prior to the September 11<sup>th</sup> field visit with the complainants, the investigators carefully reviewed the allegations raised in the July 31<sup>st</sup> complaint. HRC was also requested to provide the complaint investigators with written responses to the allegations raised in the complaint. Subsequent to the field trip, on September 25<sup>th</sup>, at the request of the complainants, the Lead Investigator engaged in a 2-hour teleconference with several of the LCL et al, members who participated in the September 8<sup>th</sup> field visit. The purpose of the call was to provide the complainants with an opportunity to submit additional arguments and information in follow-up to the written complaint and field visit.

### **Allegations Raised by the Complainants**

The written complaint focuses on two principal subject areas:

- HRC/MRC's management activities (past and planned) in the Rainbow Ridge area of the Mattole Watershed that, it is asserted, are in non-conformance with elements of the FSC Standard regarding designation and management of HCV (high conservation value) areas. Complainants assert that "previously un-entered" ("primary") and/or "old growth" areas that qualify for HCV designation have been logged or will be logged. The activities are associated with two approved Timber Harvest Plans: 1-12-026HUM (Long Ridge Cable) and 1-14-034HUM (Long Reach Helicopter).
- HRC/MRC's use of chemical pesticides to reduce the presence of tanoak that are competing with conifers is asserted to be in non-conformance with the pesticide use requirements of the FSC Standard

Ancillary issues were also raised in the complaint:

- HRC/MRC's stakeholder consultation does not conform to the requirements of the FSC Standard
- HRC/MRC's operations in the Longridge THPs are in violation of local laws and, as such, do not conform to the requirements of FSC Principle 1.

## SCS Responses to the Allegations Raised by the Complainants

To follow are issue-by-issue responses to the assertions and demands raised by the complainants.

### Past and Planned Logging in Primary/Un-entered Old Growth

Complainants assert that HRC/MRC's past and planned forest management activities in the Rainbow Ridge area of the Mattole Watershed are in non-conformance with elements of the FSC Standard regarding designation and management of HCV (high conservation value) areas. Complainants assert that "previously un-entered" ("primary") and/or "old growth" areas that they believe qualify for HCV designation have been logged or will be logged. The activities are associated with two approved Timber Harvest Plans: 1-12-026HUM (Long Ridge Cable) and 1-14-034HUM (Long Reach Helicopter).

### **Investigative Conclusion:**

At bottom line, we conclude that the forested lands at issue (i.e., stands subject to planned harvest under the two approved THPs) do not meet the FSC definition of either Type 1 or Type 2 Old Growth<sup>3</sup>. Likewise, we conclude that the forested lands at issue do not meet the FSC definition of "primary forest." While some small areas have not been previously harvested, such areas are interspersed in a mosaic pattern within areas for which stumps are present (i.e., areas of prior harvesting). The vast majority of the trees, of all sizes, in the stands at issue do not meet the prevailing definitions of old growth or legacy trees, as defined in the FSC Standard and in HRC/MRC company policy. Within the proposed harvest areas, there likely are some scattered trees that do meet the definition of old growth; trees that meet the requirements of HRC's old growth and "legacy tree" policy will be protected.

Most of the large Douglas fir trees at issue (in upslope areas outside of the watercourse zones<sup>4</sup>) are not old growth; their large size is attributable to being "open grown" as part of meadow encroachment

---

<sup>3</sup> From FSC-US Forest Management Standard (v1.0):

**Old growth:** (1) the oldest seral stage in which a plant community is capable of existing on a site, given the frequency of natural disturbance events, or (2) a very old example of a stand dominated by long-lived early- or mid-seral species. The onset of old growth varies by forest community and region. Depending on the frequency and intensity of disturbances, and site conditions, old-growth forest will have different structures, species compositions, and age distributions, and functional capacities than younger forests. Old-growth stands and forests include:

**Type 1 Old Growth:** three acres or more that have never been logged and that display old-growth characteristics.

**Type 2 Old Growth:** 20 acres that have been logged, but which retain significant old-growth structure and functions.

**Legacy Tree:** A tree, usually mature or remnant of old growth, that provides a biological legacy. For the purposes of this Standard, it is an individual old tree that functions as a refuge or provides other important structural habitat values.

<sup>4</sup> Though the complaint investigators did not descend into the watercourse zones well below the areas we visited from the ridge tops, it is our understanding that the watercourse zones do contain a more significant amount of old growth. But it is also our understanding that the California Forest Practice Regulations and, additionally,

following cessation of grazing and the advent of active wildfire suppression. This conclusion was reached by consideration of this land use history in the Mattole and by counting rings on a few downed large Douglas fir trees as well as professional inference considering the form class (e.g., very large lateral branches) of the standing large fir trees and knowledge of the stand origins. One 36" diameter stump, which had been cut within the last 10-15 years, was 76 years old. Several large, butt logs (2-3 feet in diameter) were also observed in a log deck with ring widths of 3/8 – 1/2 inch. These demonstrate the growth capacity of Douglas-fir to produce large trees in less than 100 years. Simply because the trees observed in area visited with LCL representatives were large diameter trees does not mean that they are old growth trees. The "wolf trees" that were pointed out as examples of old growth forest trees could only have developed their branch structure in an open areas, not within a forest stand as suggested by the LCL representatives. Some of these trees may merit designation as reserve trees, but we conclude that they did not develop within forest stands because their large branches occurred on all sides of the trunk, indicating that they grew in the absence of adjacent trees.<sup>5</sup>

Under HRC's "Legacy Tree" policy, these large "wolf" fir trees could be harvested because they do not meet the age requirement (germination prior to 1800), but it is our understanding that they will generally not be harvested. Rather, HRC is focusing on removing small and mid-sized tanoak (via "hack & squirt") within these meadow encroachment stands in order to create space for planting Douglas fir seedlings.

HRC personnel who participated in the field visit affirmed that any trees meeting the company's Legacy Tree policy are reserved from harvesting. The HRC policy is that all Redwood trees germinated prior to 1800 and that are at least 48" DBH qualify as Legacy Trees. For Douglas fir, the threshold is 1800 and 36" DBH. As mentioned above, many if not all of the large/wolf Douglas fir trees that, due to their age, do not meet the Legacy Tree policy are also reserved from harvest.

Again, the FSC Standard does not require, per se, the protection from harvest of areas that have not been previously entered unless such stands meet the FSC definition of Type 1 Old Growth or, less unambiguously, that meet the FSC definition of Primary Forest. (Note: the FSC Standard does allow limited harvesting in Type 2 Old Growth provided that the old growth character of the stand is not lost.) The stands visited by the complaint investigators, accompanied by the complainants, on September 11<sup>th</sup> were examples of stands in the area that, in a mosaic pattern, have few stumps (and in some locales, no

---

company policy largely prohibit harvesting in these watercourse zones. As well, the complainants have not raised issues with regard to planned management in the watercourse zones.

<sup>5</sup> We note that one of the HRC forester who accompanied us on the trip to Rainbow Ridge stated that they had cored some trees and used ring width to extrapolate tree ages. He pointed out one very large tree that they estimated was over 300 years old. It was one of the largest trees in the stand. It would qualify as an old growth tree (a "legacy tree" in the vernacular of the FSC Standard), but the age of this single trees age does not make the stand an old growth stand.

stumps)—but they do not meet the FSC definition of Old Growth stands as they are not of sufficient age. Nor, in our judgment, do these stands meet the FSC definition of “primary forest” as their relative small size, young age, and anthropomorphic origins (cessation of grazing and advent of active fire suppression) conflict with the FSC’s glossary definition of Primary Forest—that they are “relatively undisturbed.”<sup>6</sup> As such, we conclude that past and planned harvesting in these areas does not violate those elements of the FSC Standard that address management of:

- Type 1 and Type 2 Old Growth stands
- Legacy Trees
- Primary Forests.

Complainants also assert that the “FSC standards demand the retention of previously unentered stands as high conservation value forests.” We do not agree with this interpretation of the FSC US Standard. It is due to complainants’ conflation of “previously unentered” with “old growth” that, we conclude, leads to the complainants’ misinterpretation. As we have discussed, above, the complaint investigators conclude that the stands at issue do not meet the definition of old growth and, as such, are not appropriate candidates for classification as HCV (specifically, HCV3). Likewise, the stands at issue do not meet the FSC definition of “primary forest<sup>7</sup>.” Again, it is our judgement that such stands do not meet the definition of HCV (HCV3, specifically).

We note that HRC has designated one 202-acre stand as HCV. We understand this designation resulted from dialogue with stakeholders as well as LiDAR analyses of tree heights within the Mattole lands owned by HRC/MRC (the 202-acre stand contains a greater number of tall trees than elsewhere). While we did not visit this stand on September 11<sup>th</sup> and, as such, cannot opine as to its structural similarity, or dissimilarity, to the stands we did visit, we consider this designation to be an example of practicing the precautionary approach and a commendable effort to accommodate stakeholder desires rather than a process-driven designation.

This is an issue because the complainants assert that there are several other stands on HRC/MRC land in the Mattole that possess the same qualities as the 202-acre designated HCV stand. The complainants assert that these other stands should also be designated as HCVF. To resolve this issue, we conclude that HRC/MRC needs to update its prior HCVF assessment of the Mattole, utilizing appropriate and precautionary methods such as LiDAR analyses and ground reconnaissance, and to share the results of the updated HCVF assessment with the complainants. A Corrective Action Request is being raised to this effect.

---

<sup>6</sup> In the glossary definition of Primary Forest, it says that “such ecosystems are also referred to as “mature,” “old growth,” or “virgin” forests. See also Old Growth.” Clearly, the authors of the FSC US Standard were defining Primary Forest and Old Growth as largely synonymous terms, though it is generally understood by those involved in the interpretation and implementation of the FSC Forest Management Standard that “primary forests” are generally large areas and not as small as 3 acres (the stipulated minimum for designation as Type 1 Old Growth).

<sup>7</sup> Stands that are merely unentered—as distinct from meeting the definition of “primary forest” or “old growth” do not receive any special protection in the FSC Standard. In fact, the word “unentered” appears only once in the Standard and in the term “unentered old growth.”

## **Use of Chemical Pesticides**

The complainants object to HRC's continued use of chemical pesticides, all the more so when applied via "hack & squirt" followed by a foliar application to kill the sprouts that follow the initial treatment. Complainants assert that on the combined HRC/MRC ownership, 78,000 acres of forestland have been treated with hack & squirt. Complainants also cite the 2016 passage of Measure V in Mendocino County as evidence of broad community opposition to chemical pesticides and the use of hack & squirt. Overall, complainants assert that "HRC is not seeking to minimize, avoid, or eliminate herbicide use as prescribed under the FSC Principles and Criteria."

The companies' response to these allegations is that it is endeavoring to reduce chemical pesticide use, over time, but that the stand conditions it inherited at time of acquisition (of both MRC and, later, HRC) were such that using herbicides to reduce the extent of hardwoods is the only viable means for returning these stands to healthy and productive condition marked by a multi-aged preponderance of conifers interspersed with an ecologically appropriate amount of hardwoods. HRC/MRC also provided data to the complaint investigators indicating that, since 2008, HRC/MRC has applied herbicides to 19,268 acres of forestland with herbicides and that this total is not of unique acres; that is, some acres have received more than one treatment. The average annual number of acres treated with herbicides has been 1,927 acres over the past decade.

The companies also cite the fact that it is presently developing a Vegetation Management Plan (in response to a 2017 FSC corrective action request) that will guide HRC/MRC forest management staff in all vegetation management activities. The draft Plan states that the company strives to reduce and if possible avoid herbicide use on its forestland and that they expect a reduction in herbicide usage over time as stands, through management intervention, transition to desired conditions. The draft Plan also acknowledges that the silvicultural treatments required to transition stands from current to desired conditions requires opening stands to more light which, in turn, fosters growth of brush and early seral species, furthering the need for chemical use over the transition period.

### **Investigative Conclusion:**

HRC has been in business for 10 years. MRC has been in business for 20 years. Throughout the existence of both companies, the use of herbicides to reduce the extent of tanoak in mixed conifer forests has been highly contentious and, accordingly, a subject of focus and attention in the initial and subsequent annual surveillance and re-certification FSC audits. Over the years that the companies have been FSC certified, several "Findings" (Observations and Corrective Action Requests) have been raised by audit teams that, from varying aspects of the FSC US Standard, pertain to herbicide use. These Findings have resulted in corrective action responses and closures, and ongoing actions such as a Vegetation Management Plan (still in development). But the issue has persisted and, particularly in Mendocino County and the Mattole Watershed of Humboldt County, intensified. From the beginning of their engagement with FSC, HRC/MRC have been asked to demonstrate its conformance to qualitative expectations with respect to herbicide use that are found in the FSC US Standard. Expectations such as:

- Promote the development and adoption of environmentally friendly non-chemical methods
- Strive to avoid
- Use silviculture and other management activities that avoid the need
- Minimize use when use cannot be avoided
- Strive to reduce the use
- Work towards phase-out wherever possible
- Avoid the need.

The above phrases are all found within the FSC US Forest Management Standard.

Our investigation of the companies' use of chemical pesticides, in part triggered by the LCL, et al. complaint, leads us to conclude the following:

- Over the 20 years of operations in Mendocino County and 10 years of operations in Humboldt County, the use of herbicides to control (reduce the extent of) tanoak in mixed conifer forests has not demonstrably decreased as the companies are completing a first entry (under their ownership) into stands characterized by an excessive presence of tanoak attributable to prior harvesting practices
- However, the actual chemical use levels are not as high/extensive as believed by many stakeholders, including the LCL, et al, complainants
- Under the current approach to vegetation management (control of tanoak and other competing vegetation), it may be several more decades before there is a significant reduction in use levels on the companies' mixed hardwood stands and elsewhere
- The HRC/MRC Vegetative Management Plan (as a written strategy per FSC Indicator 6.6.b) is not yet complete and, based upon a draft version we reviewed, does not adequately present a strategy for a future reduction or possible eventual phase-out of chemical control of tan oak.
- There is a need for HRC/MRC to take a fresh and harder look at a broader array of strategies, understanding the inherent tradeoffs associated with any strategy, which will demonstrably result in a reduction in herbicide use levels below current and projected levels.
- That is, we cannot at this juncture say that HRC/MRC are adequately on a trajectory clearly demonstrating compliance with the "avoid/reduce/minimize/promote alternatives" expectations that are articulated in the FSC Standard.

The Vegetation Management Plan, presently in development, is an appropriate vehicle for presenting a strategy for reduction and a timeframe for achieving an "inflection point" in herbicide use levels that is realized in the future, sooner rather than later. We recognize that were there an easy path forward it would have already been pursued by now. Our investigation of this element of the LCL, et al, complaint leads us to conclude that an effective vegetation management strategy must include components such as:

- MRC/HRC personnel taking a leadership role, as necessary, in public/private and multi-owner initiatives to determine the extent of tanoak reduction through herbicide use that is needed in order to achieve a targeted extent of overstory conifers in mixed conifer stands. How many

tanoak in a problematic stand need to be killed in order to achieve desired conifer stocking levels? All of them or a portion? Over a year ago, MRC/HRC agreed to participate in such an initiative to be led by CalFire personnel at Jackson Demonstration State Forest. This initiative subsequently stalled out before it got going. MRC/HRC, as a FSC-certified forest operation, needs to not rely on other parties to see that this initiative is resumed—the company should be taking a leadership role.

- Applying more stringent filters, guided more by clear company policy and direction rather than stand-level “needs assessments” conducted by field personnel, as to under what circumstances and how to utilize herbicides as a management tool.
- Establishing, and incorporating into the Vegetation Management Plan, clear and auditable time frames for achieving measureable progress, including near-term progress, in the reduction of chemical use.

A Corrective Action Request is being raised to this effect. With respect to forest management in the Mattole, our site visit on September 11<sup>th</sup> revealed an instance that leads us to conclude that the companies are not utilizing every reasonably available opportunity to reduce herbicide use. That instance was the young stand (a small stand perhaps 3 acres in size) of tanoak that had been frilled (hack & squirted) as the first of two chemical treatments aimed at converting that site to a mixed conifer stand with planted Douglas fir intended to dominate the overstory. In our professional judgment, this site naturally developed as a pure stand of tanoak (not resulting from previous harvest) and that such stands are ecologically important<sup>8</sup>. The companies would more convincingly demonstrate its commitment to herbicide reduction/avoidance by not attempting to convert stands, or significant portions thereof, that are naturally occupied by tanoak or other non-conifer vegetation types. Additionally, as it pertains to demonstrating adherence to the FSC Standard (e.g., Indicator 6.3.d), HRC/MRC should ensure that management practices maintain or enhance plant species composition that naturally occurs on a site, in the Mattole and elsewhere.

### **Consultation with Stakeholders**

Complainants acknowledge that HRC/MRC “has taken substantial steps to incorporate input from concerned stakeholders” but they assert that the companies “have fallen short on implementation of the FSC standard.” We assume this is reference to those elements of the FSC Standard pertaining to old growth, primary forests and chemical use.

As has been long established in the FSC certification system, the stakeholder consultation mandate does not obligate a forest manager to only engage in practices that enjoy the support of interested stakeholders. Such a high bar does not apply even to managers of public forestlands. Rather, the FSC Standard stipulates that:

---

<sup>8</sup> Apart from the ecological significance of tanoak stands in the Mattole landscape, we note that Indicator 6.3.d in the FSC Forest Management Standard requires that “management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.”

- The FME (forest management entity) seeks to understand the full range of stakeholders who have a demonstrated or potential interest in the certified FMU (forest management unit)
- The FME seeks/solicits the views, concerns and issues that interested stakeholder may hold regarding management of the FMU; the FME seeks to keep stakeholders reasonably informed of planned management activities
- The FME affords due/sincere consideration to this stakeholder input in the process of formulating and executing management policies, plans and actions on the certified FMU

In the FSC system (as with most every other management system that incorporates the solicitation of stakeholder input), stakeholder consultation is not a plebiscite or democratic voting process. Ultimately, it is the forest managers' responsibility to plan and implement forest management practices and activities that they believe are in the best long term interests of the forest and its owners while duly considering the input of interested stakeholders and demonstrating overall conformance to the applicable FSC certification standard.

It is our conclusion that HRC/MRC personnel have a genuine commitment to stakeholder consultation, in the Mattole and elsewhere. HRC/MRC personnel have held numerous meetings and other exchanges with many of the signatories to the LCL, et al, complaint, including in-field meetings. By and large, HRC/MRC has and remains transparent about its forest management intentions and plans. While HRC/MRC has not always accommodated the desires of some stakeholders, it cannot be said that they have failed the FSC test with respect to stakeholder consultation, in our judgment.

### **Non-Conformity with Local Laws**

Complainants assert that they have observed direct violation of the California forest practice regulations. Specifically, complainants assert that HRC's Registered Professional Forester (RPF) of record for THP 1-12-026HUM improperly checked a disclosure box related to a THP extension request as, they assert, "at least one major landslide" was not disclosed.

During the September 11<sup>th</sup> field visit, complainants showed the landslide to the investigators, from the main road. From the standpoint of conformity to Principle 1 of the FSC standard, it is the complaint investigators' conclusion that a finding of legal non-compliance must come from appropriate forest practice regulators, not citizens or auditors. Until/unless CalFire were to raise a forest practice citation against HRC/MRC for this particular matter, we conclude that there is no violation of FSC Principle 1. And even if a forest practice violation has/does occur, this may not, in itself, constitute a non-conformance to FSC P1. A single instance of regulatory violation does not necessarily trigger a FSC non-conformance. More germane would be the severity of a single violation and/or a pattern or practice of such violations. It has been our clear sense that HRC/MRC is committed to operating in compliance with all applicable federal and state forest practice and environmental laws and regulations. While regulatory (forest practice) issues have arisen on occasion—as is the case on every other FSC-certified forest operation we are familiar with—it is our judgment that HRC/MRC does conform to FSC Principle 1.

## Lead Investigator Decision

In my capacity as the Lead Investigator for this complaint, and with the active involvement and input of the other members of the complaint investigation team, I have carefully considered each allegation raised by the complainants, within the context of the role of a duly accredited FSC Certification Body, auditing against duly endorsed FSC normative standards (in this instance, the FSC US National Forest Management Standard—V1.0). I have also engaged in extensive dialogue with pertinent SCS staff to assure that I fully understand the technical content of the written record with respect to actions taken by Humboldt and Mendocino Redwood Companies as well as SCS audit teams that have conducted prior conformity assessments of the forest management operations of HRC/MRC relative to the FSC US National Forest Management Standard. On that basis, and as is detailed above, I hereby conclude that two of the complainants' allegations with respect to Humboldt and Mendocino Redwood Companies' operations, in the Mattole and elsewhere, are factually with merit with regard to non-conformance to the FSC US National Forest Management Standard. Accordingly, two Corrective Action Requests are being raised as a result of this complaint investigation, one pertaining to updating the HCVF assessment in the Mattole and one pertaining to chemical use as addressed in a Vegetation Management Plan. These Corrective Action Requests will be incorporated into the 2018 Annual Surveillance Audit Report for HRC/MRC. (A public summary of the Audit Report, containing the audit and complaint Findings, will be issued no later than three months from the end of the audit, or December 14, 2018.) All other allegations raised by the complainants are found to not constitute non-conformities to the FSC US National Forest Management Standard.



Robert J. Hrubes, Ph.D.

Executive Vice-President, Emeritus, and Complaint Lead Investigator

SCS Global Services

Date: 25 October 2018

## Complaint Investigation Plan

---

**Complaint Subject:** Humboldt Redwood Company's management plans and actions in the Mattole Watershed

**Date Received:** 31 July 2018

**Name and Affiliation of Complainant:** Ellen E. Taylor, Lost Coast League, et al

**Complaint Investigator:** Dr. Robert J. Hrubes, SCS Executive V.P., Emeritus, FSC Lead Auditor and California Registered Professional Forester

### Areas of the complaint subject to investigation:

- Planned logging under 1-12-026HUM (2012) and 1-14-034HUM (2014)
- Use of herbicides to reduce tanoak presence
- Implications, relative of the FSC forest management certification standard, of "unentered" status of stands subject to planned timber harvesting

### Planned Investigation Activities:

- Conduct a field visit to the areas at issue as part of the September 2018 annual surveillance audit of HRC;
- Review all materials submitted by complainant;
- Consult with appropriate forestry and FSC experts, including adding such experts to the audit team for the 2018 surveillance audit of HRC;
- If determined necessary, request additional information from the complainants and HRC;
- Prepare Complaint Investigation Report and convey to complainant and involved parties.

**Expected Completion Date:** The Complaint Investigation Report will be issued by 31 October 2018