

TAMIL NADU NEWSPRINT & PAPERS LIMITED

TNPL FSC FM GROUP PROCEDURE MANUAL

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**Prepared based on Forest management groups Standard
FSC-STD-30-005 V2-0**

PART I ESTABLISHMENT OF FOREST MANAGEMENT GROUPS

1 Requirements for Group Entities

- 1.1. *The Group Entity shall be a person or group of persons registered as one independent legal entity.*
- 1.2. *The Group Entity shall comply with the applicable legal obligations, such as registration and payment of relevant fees and taxes.*
- 1.3. *When a Group Entity manages more than one group, it shall have enough capacity and resources to manage more than one certificate.*
- NOTE: Each group will result in one certificate. In any one group, either all members are FSC FM/CoC, or all members are CW/FM; if some members are certified according to FM standards and others according to CW standards, then these would be two different groups.*
- 1.4. *The Group Entity shall be responsible for conformance with this standard.*
- 1.5. *The Group Entity shall make sure that all actors in the group demonstrate sufficient knowledge to fulfil their corresponding responsibilities within the group.*

TNPL's Response:

- 1.1. Tamil Nadu Newsprint and Papers Limited (TNPL) is an independent legal entity. The board of directors list can be seen through this link <https://www.tnpl.com/leadership/>. It was established in 1979 by the Government of Tamil Nadu to produce News print and Printing & Writing paper using wood and baggase, a sugarcane residue, as the primary raw material at Kagithapuram near Karur District, Tamil Nadu, India and another Units at Mondipatti, Trichy District of Tamil Nadu, India. **TNPL will refer as "Group Entity" hereafter.**
- 1.2. The Group entity is complied with relevant legal obligations, as registration and payment of applicable fees and taxes. The group entity is a state administrative company and this details is available in this following link, <https://www.tnpl.com/about-us/>. The group entity also has relevant legal obligations, as registration and payment of applicable fees and taxes. The details are presented in <https://www.tnpl.com/investors/#financial-reporting>.
- 1.3. The Group Entity having enough capacity and resources to manage more than one group certificate. However, its covering Captive Plantations/Farm Forestry Plantations under FSC FM/CoC Certificate.
- 1.4 The Group entity having a written public policy of commitment to the FSC Principles and Criteria and it is responsible for conformance with this standard. The same policy is made available in <http://www.tnpl.com>
- 1.5. The Group Entity making that all actors in the group demonstrate sufficient knowledge to fulfil their corresponding responsibilities within the group through various training and knowledge impart programme.
The success of any people centered plantation program is vested with the awareness created and the level of participation by the people. Hence group entity has systematically incorporated awareness creation program and decentralized capacity building activities to all levels of stakeholders involved in the plantation program. The following activities will help to resolve the issues related to plantation promotional activities, conflict resolution and to create entrepreneurial skill among the participating stakeholders.

NATURE OF TRAINING	LOCATION
Technology sensitization	Mill site
Semi-mechanized Operation	Plantation areas
Safety Measures	Mill site
FSC and Inventory, Identification & Documentation of various HCvFs	Mill site / Plantation areas

Personality development	Mill site
Plantation Management and Harvesting activities	Mill site / Plantation areas

The Group entity staff and Group members will have the knowledge of the Group's procedures and the applicable Forest Stewardship Standard. To facilitate them to acquire knowledge on this the hard copy of TNPL's Group Procedure Manuals made available at main site as well as in all regional office of TNPL's Plantation Department. The soft copy of this procedure is made public in following link

<http://www.tnpl.com>

2 Requirements for group members

2.1. A declaration of consent shall be signed by each member wishing to join a group. In the declaration, the member shall:

- a) commit to follow the applicable Forest Stewardship Standard and the Group Rules;*
- b) declare that the management units they are bringing into the group are not included in another FSC certificate;*
- c) agree to allow the Group Entity, the certification body, FSC and ASI to fulfill their responsibilities;*
- d) agree that the Group Entity will be the main contact for certification.*

NOTE: The declaration of consent does not have to be an individual document. It can be part of a contract or any other document (e.g. meeting minutes) that specifies the relationship agreed between the member and the Group Entity.

NOTE 2: For Communities, the declaration may also be some other form of agreement such as assembly minutes, forest management contracts, tribal agreements for Indigenous communities, recordings of interviews in case of oral agreements, etc.

2.1.1. The declaration shall be signed either by the group member or by their representative (e.g. Resource Manager or consultant).

2.1.2. When the member is represented by another party (e.g. Resource Manager or consultant), the declaration shall also include a verifiable agreement (legal or otherwise) between the member and their representative.

NOTE: The requirement for the agreement to be verifiable means that the representatives must be able to prove that they have been authorised by the member to act on their behalf.

TNPL's Response:

The group members will provide their consent to be part of TNPL FSC FM/CoC by entering the application/agreement with the Group entity. With this giving acceptance to follow the applicable Forest Stewardship Standard and the Group Rules. These group members are not been a part of any other FSC certificate since they are registered with Group entity.

3 Division of responsibilities

3.1. The Group Entity can divide the responsibilities among the different actors in the group (e.g. Group Entity, members, contractors, etc.).

NOTE: The Group Entity is free to determine at what level implementation of requirements is carried out as long as conformance is demonstrated for each management unit (as per Clause 4.1).

3.2. The Group Entity shall define and document the division of key responsibilities within the group, as described in Clause 3.1.

Resource Manager and Resource Management Unit

3.3. Some or all members of a group may choose to transfer the responsibility to ensure conformance with the applicable Forest Stewardship Standard in their management unit(s) to one Resource Manager, and may be grouped into one Resource Management Unit (RMU).

3.3.1. The Resource Manager of an RMU shall assume the responsibility to conform with the applicable Forest Stewardship Standard and to follow the Group Rules on behalf of all members within their RMU. NOTE: An RMU can include all members of a group or a sub-set of members within a group. There may be more than one RMU within one group.

NOTE 2: Members of an RMU may implement some management activities in their management units, as long as the responsibility to ensure that there is conformance with the applicable Forest Stewardship Standard remains with the Resource Manager.

TNPL's Response:

S.No	Responsibilities	Group entity responsibility	Group member responsibility
1	Management planning	<ul style="list-style-type: none"> The land will be identified and selected based on the site conditions The MoU will be executed with group member incase of Captive Plantation scheme The application with required documents will be collected from group member incase of Farm Forestry Scheme The rate for the scope of the works will be fixed through tender 	<ul style="list-style-type: none"> The group member will execute the MoU/Application based on the scheme of enrolment
2.	Planting and Maintenance of the plantations	<ul style="list-style-type: none"> The contractor will be fixed and the purchase orders will be issued to them to carry out plantation activities such as land development, planting, and maintenance activities in case of Captive plantation scheme by Group entity by following the FSC standards. In addition to Group entity, the Contractors also having responsibility to establish and maintain the Captive plantations meeting with requirement of FSC standards. 	<ul style="list-style-type: none"> The group member will establish and maintain the pulpwood plantations incase of Farm Forestry scheme by following the FSC standards.
4	Harvesting	<ul style="list-style-type: none"> In the Captive Plantations scheme the group entity itself will provide the consent to harvest since the ownership of the plantations lies with Group entity which will be intimated the land owner either through phone call or letter. The yield will be estimated by field officials based on field estimation. The harvesting application along with estimated yield will be sent to mill site and the purchase orders will be issued based on the documents. The contractor will be fixed by the group entity to harvest the plantations and the contractor will harvest and transport the pulpwood to mill site. The harvested pulpwood will be weighed at local weighbridge and transported to mill site along with consignment note and FSC claim 	<ul style="list-style-type: none"> In the Farm Forestry scheme, the group member will give their consent to harvest the plantations by the group entity. While harvesting the safety measures will be ensured by Group members as well as Contractors

		<p>seal. Accordingly, it will be accounted separately as FSC 100%.</p> <ul style="list-style-type: none"> While harvesting the safety measures will be ensured by Group entity as well as Contractors 	
5	Quality control	<ul style="list-style-type: none"> The captive plantations will be maintained by the group entity and carry out maintenance activities every year. By this, the good quality plantation will be raised and maintained by the group entity. 	<ul style="list-style-type: none"> The group member will maintain the better plantations raised under Farm Forestry scheme
6	Sales & Marketing of FSC products	<ul style="list-style-type: none"> <u>The entire pulpwood is taken from Captive plantation/Farm Forestry and consumed internally by the group entity.</u> The FSC papers are produced by Group entity and will be marketed by them. 	<ul style="list-style-type: none"> The group member will give the consent to harvest their plantations.
7	Processing	<ul style="list-style-type: none"> The harvested pulpwood will be received at mill site and weighed at mill weighbridge. After weighment the pulpwood will be either stored in wood yard or sent to direct feeding for chipping. In wood yard the pulpwood is stored separately. Thus the group entity is ensured that the FSC 100% material is not mixed with uncontrolled material. During chipping also, the identity of FSC 100% material will be maintained by the group entity. 	<ul style="list-style-type: none"> The group member doesn't have the responsibility in processing.

The Group entity has appointed CGM (Plantation, R&D) and SO as a Management Representative who is having overall responsibility and authority for the group entity's compliance with all applicable requirements of FSC standard in their management units. The different level field officials also having responsibility to ensure conformance with the applicable Forest Stewardship Standard in their management units. The details of responsibilities of various level of Group Entity are as follows:

S.No	Name	Designation	Responsibility in implementing FSC standard
1	Dr.R.Seenivasan	CGM (Plantation, R&D) and SO	Over all Responsible for FSC FM/CoC system
2	Mrs.R.S.Tamilarasi	AGM (Lab)	Responsible for FSC / NEPCon Trademark usage
3	Mr.K.Jayakumar	D G M (Forestry)	Responsible for segregation and identification of FSC 100% materials upto Forest Gate
4	Mr.G.Ravi	AGM (Plantation)	Responsible for segregation and identification of FSC 100% materials upto Mill Gate
5	Mr.Dhayalan	AM (Forestry)	Responsible for segregation and identification of FSC 100% materials upto Mill Gate
6	Mr.Sathiyamorrthy	DM (Plantation)	

7	Mr.Nandhakumar	AFO (Plantation)	Responsible for conformance with the applicable FSC Standard at West Zone / Region
8	Mr.Suresh	JO (Plantation)	
9	Mr.Maruthupandi	JO (Plantation)	
10	Mr.Ramesh	DM (Plantation)	Responsible for conformance with the applicable FSC Standard at East Zone / Region
11	Mr.Karthickmani	AFO (Plantation)	
12	Mr.Buvanendiran	JO (Plantation)	
13	Mr.Natarajan	AM(Forestry)	
14	Mr.Suresh Kumar	DM (Plantation)	Responsible for conformance with the applicable FSC Standard at South Zone / Region
15	Mr.Sudhakar	FO (Forestry)	
16	Mr.Naresh	AFO (Plantation)	
17	Mr.Midhunraj	JO (Plantation)	
18	Mr.Ramesh	DM (Plantation)	Responsible for conformance with the applicable FSC Standard at North Zone / Region
19	Mr.Prabhakaran	AFO (Plantation)	
20	Mr.Rajasekar	AFO (Plantation)	
21	Mr.J.Santhakumar	AGM (Pulp)	Responsible for segregation and identification of FSC 100% materials during Wood receipt and storage at Wood yard

4 Conformance across management units

4.1. Conformance with all requirements of the applicable Forest Stewardship Standard shall be demonstrated for each management unit within the scope of the FSC FM/CoC or CW/FM group certificate, except as provided for in Clause 4.2.

4.2. Conformance with area thresholds in the applicable Forest Stewardship Standard with regards to Criterion 6.5, can be demonstrated across management units rather than at the level of the individual management unit for FM/CoC SLIMF management units.

4.2.1. In groups with SLIMF and non-SLIMF management units, the non-SLIMF management units may support SLIMF management units to conform with such requirement, partially or fully.

NOTE: Non-SLIMF management units always need to conform with Criterion 6.5 in each management unit.

TNPL's Response:

The various records such as Management Plan, HCVF assessment, Environmental Impact Assessment and Socio-Economic Impact Assessment confirming the Group entity conformances with all requirements of the applicable Forest Stewardship Standard and demonstrated for each management unit within the scope of the FSC FM/CoC group certificate. Also confirms that the plantations raised by Group entity not having native ecosystem since they are raised in marginal dry or waste land or cultivable agricultural land. However, the group entity is maintaining the representative samples where its taking more area for dry and waste land to develop plantations under Captive Plantation scheme. So its conformance with area thresholds in the applicable Forest Stewardship Standard with regards to Criterion 6.5.

5 Group size

5.1. The Group Entity shall determine, based on its human and technical capacities, the maximum group size that it can manage, in terms of:

- a) number of group members;
- b) individual management unit size; and/or
- c) total forest area and distribution.

5.2. The Group Entity shall develop a group management system (as per Part II of this standard) that allows the continuous and effective management of all members of the group.

TNPL's Response:

The Group entity could be able to support 30,000 group members by its management system and it has sufficient human and technical resources as per organization set up given in the Annexure-1 to manage and control the group. The individual management unit size may be from 0.50 acres to 1500 acres in a single location. The group entity also having the capacity to manage of more than 25,000 Ha under its control since it is implementing their plantation activities as "Potential Village Combined Cluster Approach".

The Group entity is developed group management system called "TNPL Plantation Mobile Application". Through this well-developed system the inclusion of group member under TNPL umbrella, compliances of FSC Standards and exclusion of group member is managed. This will be allowing the group entity for continuous and effective management of all members of the group.

TNPL Plantation Mobile Application

Android-based mobile application integrated with ERP system for plantation establishment activities were developed to capture the real time data and day to day activities carried out at field level.

Objective

- Systematic approach on plantation activities and its management
- Monitoring the plantation activities and periodic inspection at various stages of plantation
- Compliances the FSC standards by FME & FMU
- Real time information about the availability of pulpwood

Key Features

- Supply chain optimization for Pulp wood supply with Automation
- Onetime data entry and direct sync with Oracle EBS ERP.
- Ability to upload multiple images, videos and voice messages from the field
- Capturing Geo Location of the plantation
- Mass maintenance of data as Excel as User Interface with Oracle Desktop
- Integration
- Integrated helpdesk for issue reporting
- Weather Forecast and nearby lands

Advantages

- A way of systematic and digital approach
- To ensure sustainability of pulpwood through digitalization.
- Timely communication to farmers and acts as helpdesk between farmer and company.

Activities Carried Out

- Registration of Farmer & Land details
- Record of Land location with extent proposed for planting
- Documentation of all activities carried out in the farm field
- Monitoring from Planting till harvesting

- The growth parameters such as girth, height, yield will be assessed and documented using this application
- Periodical monitoring will be done once in a year.



6 Multinational groups

6.1. *FM/CoC and CW/FM groups shall only be established at a national level, except in the cases described in clause 6.2.*

6.2. *In cases where homogeneous conditions between countries allow for an effective and credible multinational implementation of the group management system, the Group Entity shall request formal approval from FSC*

TNPL's Response:

The Tamil Nadu Newsprint and Papers Ltd (TNPL) is an independent legal entity, which are having the plantation operation in the State of Tamil Nadu, India. Hence the group scheme is applied at National level only.

However, in cases where homogeneous conditions between countries allow for an effective and credible multinational implementation of the group management system, the Group Entity will request formal approval from FSC.

PART II GROUP MANAGEMENT SYSTEM

7 Adding new members to the group

7.1. The Group Entity shall evaluate every applicant who wishes to join the group and ensure that there are no major non-conformities with the applicable Forest Stewardship Standard, nor with membership requirements, before adding the new member to the group.

7.1.1. The Group Entity shall conduct a field evaluation to conform with Clause 7.1, except for applicants meeting the SLIMF eligibility criteria or the definition of Communities in this standard, whose evaluation may be done through a desk audit.

7.1.2. When a member wants to move from one group to another group managed by the same Group Entity, the Group Entity shall implement this evaluation to allow for the move.

TNPL's Response:

The Group entity will evaluate every applicant for membership of the Group and ensure that there are no major non conformities with applicable requirements of the Forest Stewardship Standard, and with any additional requirements for membership of the Group, prior to being granted membership of the Group. The group entity will evaluate the members with following criteria through field or desk which will be certified by Senior Management of Plantation Department:

- Agree to join membership of the plantation scheme and Group
- Submitted the required land documents / Legal ownership to join with Group
- Knowledge of FSC standards & FSC certification process (Here, the Group entity will play a vital role to impart knowledge about FSC standards on Group members)
- Agreed to access His / Her Plantation area by the group entity or FSC officials or certification body officials for the purposes of evaluation and monitoring.

Since the Group entity is managing all the members under one group, there will not be question of raising moving members from one group to another group. If the Group entity is having more than one group in future, then it will implement this evaluation to move from group to another group managed by Group Entity.

8.Provision of information to members

8.1. The Group Entity shall provide each member with information, or access to information, about how the group works. The information shall include:

a) The Group Rules and the applicable Forest Stewardship Standard, and an explanation of how to conform with them. The Group Entity shall provide access to other applicable normative documents upon request;

b) An explanation of the certification body's evaluation process;

c) An explanation that the certification body, FSC and ASI have the right to access the members' management unit(s) and documentation;

d) An explanation that the certification body will publish a public summary of their evaluation report; ASI may publish a public summary of their evaluation; and FSC will include information about the group in its database;

e) Explanation of any costs associated with joining the group.

8.1.1. When the Group Entity provides members with a summary of these items, it shall make available the full documentation upon request from the members.

8.1.2. The information shall be presented in a way that is understandable for members.

TNPL's Response:

The Group entity will provide information about Group rules and applicable Forest Stewardship Standard and explanation of how to conform to each member of the group. The Group Entity will also provide access to other applicable normative documents upon request. It will explain about the certification body evaluation process, about certification body and summary of their evaluation report to the members.

Further, an explanation about the rights of certification body, FSC and ASI to access the members' management unit(s) and documentation will be informed to the group member by Group entity while enrolling them under TNPL FSC-FM group. Also an explanation to the Group members by Group entity about publishing a public summary of their evaluation report by the Certification Body and ASI. The Group entity also give explanation to the Group member that FSC will include information about the group in its database by FSC.

Also the Group entity will provide members with a summary of these items, it will make available the full documentation upon request from the members. The Group entity will provide details or explanation about the joining the group doesn't require any cost which will be done at free of cost. Accordingly, the group members are joined with Group entity at free of cost which also informed to them while registering them under TNPL umbrella. These details are informed to them with their understanding way either in English or Tamil by our Field officials.

To facilitate them to acquire knowledge on this the hard copy of TNPL's Group Procedure Manual and FSC standard made available at main site as well as in all regional office of TNPL's Plantation Department. The soft copy of this procedure and FSC standard are made public in following link,

<http://www.tnpl.com>

9 Group Rules

9.1. The Group shall develop, implement and keep updated written rules to manage the group covering all applicable requirements of this standard, according to the scale and complexity of the group, including:

- a) Rules setting out who can become a member of the group;*
- b) Rules setting out how new members are included in the group;*
- c) Rules setting out when members can be suspended or removed from the group;*
- d) An internal monitoring system for the group;*
- e) A process to resolve corrective action requests issued internally and by the certification body, including timelines and implications if any of the corrective actions are not solved;*
- f) A procedure to solve complaints from stakeholders to group members;*
- g) A system for tracking and tracing the FSC-certified forest products produced by the group members up to the defined 'forest gate', in conformance with Criterion 8.5 of the applicable Forest Stewardship Standard;*
- h) Requirements related to marketing or sales of products;*
- i) Rules setting out how to use the FSC trademarks and the trademark license code.*

NOTE: The reference to the scale and complexity of the group refers to the fact that larger and more complex groups, with higher associated risk, might require more comprehensive procedures to ensure the protection of environmental and social values, such as High Conservation Values, Indigenous Peoples, Rare and Threatened Species, etc. Smaller groups, with less associated risk, may develop simpler procedures, but still need to develop all the mentioned Group Rules

TNPL's Response:

The Group entity framed written rules to manage the group covering all applicable requirements of this standard. The procedures are as follows:

1. Rules regarding eligibility for membership to the Group:**a) Captive Plantation scheme**

- **The size of the unit of the land must be 10 Ha in a single location, single ownership or owned by the family members. The maximum size of FMU will be upto 1500 acres**
- The land should be patta land with proper legal rights to the group member.
- The group member should accept the FSC policies and adhere to all the FSC principles / criteria and will be allowed to sign MOU with the group entity

b) Farm Forestry scheme

- **The marginal, small, semi-medium, medium and large land holding farmers those are want to develop and maintain the pulpwood plantations by their own are having eligibility to enrol them as Group member under Farm Forestry scheme**
 - **Marginal:** This category refers to the farmers that possess farmland below 1 hectare.
 - **Small:** This category refers to the farmers who possess land between 1 to 2 hectares.
 - **Semi-Medium:** The farmers who possess land between 2 to 4 hectares come under this category.
 - **Medium:** This category refers to those farmers who have farmland between 4 to 10 hectares.
 - **Large:** Farmers possessing above 10 hectares of land for cultivation come under this category.
- **The Farm Forestry scheme FMU's having land holding between 0.50 acres to 300 acres**
- The land should be patta land with proper legal rights to the group member.
- The group member should accept the FSC policies and adhere to all the FSC principles / criteria and will be allowed to sign applications with the group entity

2. Addition of Group members in Group Entity:

- The farmers/institutions will offer their consent to enrol them under captive plantations/Farm Forestry scheme. In case of Government land, the Government will issue Government Order to allot their wasteland to TNPL under captive plantation scheme.
- The field will be visited by concern TNPL field officials and the suitability for raising pulpwood plantations is checked. Based on this, they will collect the documents related to land details, personal details, etc., and forward the same to TNPL administrative office which is located at Kagithapuram, Karur District
- The legal entity of the land will be verified by TNPL and TNPL will execute agreement/application with farmers/institutions/government based on the scheme model.
- From the date of registration the farmers/institutions/government will become a FMU in Forest Stewardship Council (FSC)-Forest Management (FM) certification process under TNPL Captive plantations/Farm Forestry scheme

- The FMU may be registered under either lease basis or revenue sharing basis TNPL : FMU (70:30) in case of captive plantation scheme
- The High Conservation Value Forest (HCVF) if any present that will be identified, documented and protected by TNPL

2. Deletion of Group members from Group Entity:

- After harvesting the plantations raised under TNPL captive plantations/Farm Forestry scheme TNPL will send a letter to FMU to offer their interest to continue in Forest Stewardship Council (FSC)-Forest Management (FM) certification process under TNPL captive plantation/Farm Forestry Scheme
- TNPL will provide one month time period from date of this letter to give consent to continue or withdraw from TNPL FSC-FM certification by FMU
- If the FMU is given interest to continue with TNPL FSC-FM certification then the agreement/applications will be renewed and they will be continue as FMU under TNPL FSC-FM certification
- If FMU replied as they are not interested then they will be deleted from TNPL FSC-FM certification from the date of receipt of their reply
- If FMU is not given any reply even after one month from date of TNPL letter then they will be automatically deleted from TNPL FSC-FM certification
- In case of Casuarina plantations raised under Farm Forestry, the plantations will be continued with TNPL FSC-FM certification if they again planted with pulpwood plantations and interested to continue. If they are not replanting with pulpwood species, then that FMU will be excluded from TNPL FSC-FM certification

3. Suspension of Group Members:

If the Group member cut the pulpwood trees or create any charge, lien, mortgage or transfer the right, title, interest of any nature whatsoever the said prosperity or on trees without prior information to the company, the Group member will be in suspension temporarily from the Group. An intimation or notification letter will be send to the group member regarding the suspension from the group. The letter will have the details of reason and the effective date of suspension. If the group members are not giving any reply and suspension not revoked within 3-month period, then the members will be withdrawn from the group permanently.

4. Internal Monitoring System:

- The plantations are being monitored at the time of carrying the work in all the plantation areas during the course of implementing different operations in different locations by the field staff up to the level of Officer in Charge of the Region.
- **The Regional Officers are to visit and monitor the plantation activities in each FMU in their control atleast once in year.**
- **The internal Monitoring team members Deputy General Manager (Forestry), Assistant General Manager (Plantation), Deputy Managers, Assistant mangers and Field officers will visit the all the FMU's once in a year to monitor the plantation activities and its impacts (Environmental & Social) and the FSC related activities carried out by TNPL and report to the Head of Plantation Department. So all the FMU's will be visited and monitored by group entity atleast once in a year. Hence, the group entity using the 100% sampling intensity for its internal monitoring mechanism.**

- The Head of Plantation Department will visit the Plantations on need based.

To establish an efficient internal control system ensuring that all members are fulfilling applicable requirements TNPL's Plantation Department developed a system called mobile monitoring of plantation activities. It covers all the plantations activities such as Pre Inspection of land, FMU Registration (including assessment of FSC standard requirements and details of HCVF), Pre Planting Inspection, Distribution Acknowledgement, Post Planting Inspection, Periodic Inspection (Regular), Periodic Inspection (Need Based), Pre Harvest Inspection, Pulp Wood Supply, Post-harvest Inspection etc. This system also includes Farmers List, Transaction Summary, Weather Information. **By this well systematized mobile monitoring system, entire FMU's are visited and monitored atleast once in a year by Group entity.**

5. Corrective Action Requests

The monitoring of plantation activities will be carried out once in a year for all the FMU's by the field executives of the group entity. The Field executives issue corrective action request if any non-conformities are identified during their internal monitoring. Any corrective action issued by field executives of group entity will be assessed by higher executive cadre of the group entity (Senior Manager and above). The higher executive cadre of the group entity will verify the action taken by group member including the timelines (maximum of within 6 months) as specified in the corrective report. The format of the corrective action report is presented in Annexure.

If the corrective action is not completed, then the group member will be suspended temporarily for next three months and later will be removed permanently from the group if it is not addressed based on the non-conformity issued. The same will be intimated to the group member.

The internal monitoring results will be analysed and if any new indicator to be added in monitoring as outcome that will be added in monitoring indicators for next audit. Group Entity issue corrective action requests to address non-conformities identified during the internal monitoring and follow up their implementation.

In general, the plantations raised by group member are short rotation crops where the plantation management activities will be carried out till harvest incase of Casuarina and upto 4th year incase of Eucalyptus species. So these FMU will be treated as active management units. However, in large extent Eucalyptus plantations like Captive plantations there will not be plantation management activities after 4th year since the rotation of this species is 5 years. So these plantations may be treated as Inactive Management Unit which will be monitored as per the selection intensity of Standard.

Group entity are also in the process to use remote sensing in its plantation management system.

Though group entity visiting all the FMU's once in a year, Group Entity lower the minimum sample defined in Clause 11.4 based on the regular analysis of the results of the monitoring as per Clause 11.1 c) for each visit. However, the entire FMU will be visited and monitored atleast once in a year.

Though group entity visiting all the FMU's once in a year, Group Entity increase the calculated minimum sample for each visit when high risks are identified (e.g. unresolved substantiated land tenure or use rights disputes, High Conservation Values (HCVs) are threatened, substantiated stakeholder complaints, etc.). However, the entire FMU will be visited and monitored atleast once in a year.

Group Entity visit different management units during the internal monitoring from the ones previously visited by the certification body, unless there are pending corrective actions, complaints or risk factors that require a revisit of the same units.

6. Group Member inputs/complaints procedure:

The stakeholders may complaint about their field problems by any one of the followings method:

- By phone call
- By registering in the compliant register available at TNPL plantation office
- By sending mail
- By sending written complaints through post/courier

The FME will provide response to the stakeholder within a period of 15 days from the date of receipt of the complaint.

If any complaint received from stakeholders through any one of the above mode, it will be registered in the complaint register as soon as received and forward to the TNPL Plantation Admin office. In some times the complaints will be received directly at TNPL Plantation Admin office. DGM (Forestry) will assess the complaints received from stakeholders and analyses the root cause of the issues. Then he will find out the solution to sort out the issues and not to occur the same issues in future. Accordingly, DGM (Forestry) put up the details about issues and solutions to get approval from CGM(Plantation, R&D) and SO, Head of Department. CGM(Plantation, R&D) and SO, analyse the issues and solutions given by DGM(Forestry) and approved the solutions for implementation.

Based on approval from CGM(Plantation,R&D) and SO, DGM (Forestry) instruct the concern field officials to sort out the issues raised by stakeholders. He will also confirm the complaints sorted out by field officials by reviewing them. This whole complaint procedure will take a time of 60 days. So if any complaint/issues raised by any of the stakeholders will be addressed within 60 days of receipt of complaint. This 60 days time period will also be informed to stakeholders through phone or letter or mail once we received the complaints from them.

Similarly, if the complaints is received from any stakeholders with respect to damage/loss for them with supporting evidence that will be registered in the register and forwarded to TNPL Plantation admin office. It will be assessed by DGM (forestry) and he will analyse root cause for the damages/losses. In the event that evidence is considered relevant, field investigation / verification will be conducted within 60 days of receipt of the complaint under the supervision of DGM (Forestry).

After field verification, DGM (Forestry) will forward his remarks and compensations request to CGM(Plantation,R&D) and SO, for approval. CGM(Plantation, R&D) and SO, will approve the compensations based on the nature of damage/losses. Accordingly, the compensations will be paid to stakeholders within 30 days from date of report submitted by DGM(Forestry). Hence the complaints received from any stakeholders with respect to damage/loss will be addressed within 90 days from date of receipt of complaints from any of the stakeholders

In generally the complaints received from the stakeholders in the below categories:

- For want of good quality seedlings
- For want of releasing Purchase Order to harvest their plantations
- Payment request for the pulpwood supplied by them
- Replacement for damaged or dried plants which supplied from TNPL
- Raising Pulpwood Plantations

CGM(Plantation,R&D) and SO is the competent authority to provide solutions for all the complaints received from anyone of the stakeholders. This well-structured resolving mechanism lead to consistent outcome to any of the complaints from stakeholders.

In cases where a dispute relates to the Principles and Criteria of the FSC, the certifying body will be informed immediately about the disputes and will act accordingly.

Through this systematic system Tamil Nadu newsprint and Papers Limited will addresses any complaint received from any of the stakeholders.

Contact information of the person or position responsible for addressing inputs/complaints:

Dr.R.Seenivasan
Chief General Manager (Plantation, R&D) and SO
E-mail ID: seenivasan.r@tnpl.co.in
Telephone Number : 04324 – 277001 to 277010

TNPL will cease or stop its operations and procuring FSC FM 100% pulpwood where the disputes exists of substantial magnitude or substantial duration or Involving a significant number of interests. Under these circumstances, TNPL will not continue its FSC FM operations in these selected plantations which will be excluded from TNPL FSC FM scope of certification and pulpwood from these plantations **will not be procured as FSC FM 100% material.**

If the disputes/complaints having considerable importance, size (may be from more than 10 stakeholders, or worth, or having substance or capable of being treated as fact; not imaginary will be treated as Substantial Magnitude”.

Similarly, if the we are getting atleast one dispute/complaint per day for one-week continuous period about the same particular plantation/location or reasons, that will be treated as disputes/complaints with substantial duration. If the disputes/complaints about the same particular plantation/location or reasons are received from more than 10 stakeholders will be treated as having significant number of interest.

Under these circumstances, TNPL will not continue its FSC FM operations in these selected plantations which will be excluded from TNPL FSC FM scope of certification and pulpwood from these plantations **will not be procured as FSC FM 100% material.**

In case the complaint regarding sourcing plantations then material will not be sourced as FSC 100% from the concerned field during Complaint verification period. If that area not confirming the FSC, Forest Stewardship Standard for India : FSC-STD-IND-01-2022 EN standard and corrective action cannot be determined and/or enforced, the supply from that particular area/source will be excluded from FSC 100% and treated as Uncontrolled Material.

7. System of Tracking of FSC certified Product:

- All the harvested FSC 100% pulpwood material shall be transported by TNPL/Farmers with valid Consignment Note document. TNPL officials shall issue the Consignment note, which is having the source of pulpwood, PO numbers, name of species and truck details. The FSC 100% seal and TNPL FSC-FM certificate code will also affixed in the consignment note by Field officials. TNPL Field officials shall verify the sources of the material, FSC 100% seal and TNPL FSC-FM certificate code in the Consignment note document. Through this verification by field officials the sources and origin of the FSC 100% pulpwood material shall be verified and

confirmed. The field weighment shall also taken to confirm the FSC 100% pulpwood quantity transported from Captive Plantations/Farm Forestry Plantations to TNPL and it shall be verified by TNPL Field officials. Each truck shall carry these documents i.e., Consignment Note and Field Weighbridge weighslip during transport of FSC 100% pulpwood from Captive Plantations/Farm Forestry Plantations to TNPL.

- At TNPL gate the truck number and PO details in the Consignment Note shall be verified and same will be entered in ERP system at gate entry before allowing the truck inside the factory. Without Consignment Note and Field weighbridge weighslip no trucks will be allowed inside the factory.
 - At TNPL weighbridge, the source, truck number, Field weight shall be verified then the Gross weight of the truck will be weighed. In the PO, the source and species of the material i.e., FSC 100% debarked EH/Cas/Other species pulpwood, Scientific name of the species and TNPL FSC-FM certificate code shall be verified by weighbridge officials and entered in the ERP system before weighing the Gross weight. Then the truck will be allowed for unloading the FSC 100% pulpwood and stored separately in the yard and utilized for FSC paper production.
 - Thus, the history of FSC 100% pulpwood transported through each truck i.e, from Captive plantations/Farm Forestry Plantations to mill wood yard and mill woodyard to till utilization shall be verified and maintained in a systematic way. Through this well systemized control system there will not be any risk of mixing FSC 100% pulpwood material with non-eligible inputs in its supply chain during transport, processing or storage and ensures transaction verification of FSC 100% pulpwood material to TNPL
8. The Group entity does not sell or ship the FSC certified material as pulpwood to other organization since it is used for its own production. However, for FSC certified material as pulp wood, the purchase and transport documents would contain a seal or printed matter as “FSC 100%” and TNPL FSC-FM certificate code.

The sale and delivery of FSC certified material as paper is carried out as per FSC CoC standards.

9. The Group entity ensures compliance with all applicable FSC/NEPCo trademark use requirements. FME would get appropriate approval from FSC / NEPCo for use of trademarks. The general labelling requirements and eligibility for labelling are carried out as per FSC COC Manual.

10 Group records

10.1. The Group Entity shall maintain up-to-date records covering all applicable requirements of this standard and the applicable Forest Stewardship Standard. These shall include:

- a) A list of the members of the group, including for each member:*
- i. name and contact details;*
 - ii. the date of entering the group and, where relevant, the date of leaving the group, and the reason for leaving;*
 - iii. number and area of management units included in the group;*
 - iv. geographical location (e.g. coordinates) of each management unit included in the group, supported by a map or documentation;*
 - v. type of forest ownership per member (e.g. privately owned; state managed; communal management; etc.);*
 - vi. main products;*
 - vii. the sub-certificate codes where these have been issued.*

NOTE: The Group Entity must fulfil data protection responsibilities when gathering this information.

- b) Any records of training provided to staff and/or group members;*
- c) Declaration of consent from all group members, as per Clause 2.2;*

- d) *Documentation and records regarding recommended practices for forest management (e.g. silvicultural systems);*
- e) *Records demonstrating the implementation of the group management system. These shall include records of internal monitoring, non-conformities identified in such monitoring, actions taken to correct any identified non-conformity, etc.;*
- f) *Records of the actual or estimated annual harvesting volume of the group and actual annual FSC sales volume of the group.*

NOTE: The amount of records maintained centrally by the Group Entity may vary from case to case. In order to reduce costs and increase the efficiency of evaluations by the certification body, and subsequent monitoring by FSC and/or ASI, records should be stored centrally or be accessible digitally whenever possible.

10.2. The Group Entity shall retain group records for at least five (5) years.

10.3. In countries where FSC International has determined that there is a high risk of false claims involving material harvested from groups, the Group Entity shall maintain up-to-date records of the harvesting and FSC sales volumes of each management unit in the group.

NOTE: For management units in the group where the harvesting and sales are carried out by a contractor, the Group Entity should verify that the volumes sold by the contractor correspond to the estimated volumes bought from its group. For this purpose, the contract between the forest owner and the contractor should include a requirement for the contractor to communicate to the forest owner and the Group Entity the actual (measured) volume harvested and sold.

TNPL's Response:

The group entity will maintain complete and up-to-date records covering all applicable requirements of this standard. These includes:

- List of names and contact details of Group members, together with dates of entering and leaving the Group scheme, reason for leaving
- Number and area of management units included in the group
- Geographical location (e.g. coordinates) of each management unit included in the group, supported by a map or documentation
- Type of forest ownership per member (e.g. privately owned; state managed; communal management; etc.) and main products i.e., Pulpwood
- Group entities will not issue any kind of sub certificates or declarations to their group members that could be confused with FSC certificates. Group member certificates may however be requested from the certification body
- Records of training provided to staff or Group members, relevant to the implementation of this standard or the applicable Forest Stewardship Standard;
- Consent of all the Group members like applications from group members, etc.,
- Records demonstrating the implementation of the group management system. Its like records of internal monitoring, non-conformities identified in such monitoring, actions taken to correct any identified non-conformity, etc.;
- Records of the actual or estimated annual harvesting volume of the group and actual annual FSC sales volume of the group.
- Group records will be retained for at least five (5) years.

The group entity is directly procuring the FSC 100% pulpwood from group members without any sub contractors. So the group entity is maintaining the entire traceability of origin of material, transportation and reaching the mill gate of FSC 100% material. The Group entity is maintaining a up-to-date records of the harvesting and FSC sales volumes of each management unit in the group.

11 Internal monitoring

11.1. The Group Entity shall implement a documented internal monitoring system that includes at least the following:

- a) A description of the internal monitoring system, sufficient to:
 - i. make sure there is continued conformance with the applicable Forest Stewardship Standard in the management units in the group;
 - ii. check the adequacy of the group management system and the Group Entity's overall performance.
- b) Regular (at least annual) monitoring visits to a sample of management units within the group;
- c) Regular (at least annual) analysis of the results of the internal monitoring to improve the group management system.

11.2 The Group Entity shall select the requirements from the applicable Forest Stewardship Standard to be monitored at each internal evaluation according to the scale, intensity and risk.

NOTE: The Group Entity may focus their monitoring during a particular internal evaluation on specific elements of the applicable Forest Stewardship Standard, with the provision that all aspects of the Forest Stewardship Standard are evaluated for the group, through the sampled management units, during the period of validity of the certificate.

11.3 The Group Entity shall specify what constitutes an active management unit for the group and justify the classification of activities as active or inactive management.

11.4 The minimum sample of management units to be visited annually for internal monitoring shall be calculated according to this table:

Size class Internal monitoring	Size class Internal monitoring
Active management units > 1,000 ha	$X = \sqrt{y}$
Active management units \leq 1,000 ha; SLIMF management units and Communities	$X = 0.6 * \sqrt{y}$
Inactive management units	$X = 0.1 * \sqrt{y}$
Management units in Resource Management Units	At the discretion of the Group Entity

Table 1. Internal monitoring sampling calculation.

Where: X = number of management units to be sampled;

y = number of active or inactive management units within each category.

11.5 The number of units calculated (X) using Table 1 shall be rounded up to the nearest whole number.

11.6 Inactive management units may be monitored remotely if the necessary information is available (e.g. remote sensing, digital imagery, phone interviews, documents proving payments/sales/provision of material and training).

11.7 The Group Entity may lower the minimum sample defined in Clause 11.4 based on the regular analysis of the results of the monitoring as per Clause 11.1 c).

11.8 The Group Entity shall increase the calculated minimum sample when high risks are identified (e.g. unresolved substantiated land tenure or use rights disputes, High Conservation Values (HCVs) are threatened, substantiated stakeholder complaints, etc.).

11.9 The Group Entity should visit different management units during the internal monitoring from the ones previously visited by the certification body, unless there are pending corrective actions, complaints or risk factors that require a revisit of the same units.

11.10 The Group Entity shall issue corrective action requests to address non-conformities identified during the internal monitoring and follow up their implementation.

NOTE: Non-conformities identified at the level of a group member may result in non-conformities at the Group Entity level when the non-conformities are determined to be the result of the Group Entity's performance.

TNPL's Response:**1. Internal Monitoring System:**

- The plantations are being monitored at the time of carrying the work in all the plantation areas during the course of implementing different operations in different locations by the field staff up to the level of Officer in Charge of the Region.
- **The Regional Officers are to visit and monitor the plantation activities in each FMU in their control atleast once in year.**
- **The internal Monitoring team members Deputy General Manager (Forestry), Assistant General Manager (Plantation), Deputy Managers, Assistant managers and Field officers will visit the all the FMU's once in a year to monitor the plantation activities and its impacts (Environmental & Social) and the FSC related activities carried out by TNPL and report to the Head of Plantation Department. So all the FMU's will be visited and monitored by group entity atleast once in a year. Hence, the group entity using the 100% sampling intensity for its internal monitoring mechanism.**
- The Head of Plantation Department will visit the Plantations on need based.

To establish an efficient internal control system ensuring that all members are fulfilling applicable requirements TNPL's Plantation Department developed a system called mobile monitoring of plantation activities. It covers all the plantations activities such as Pre Inspection of land, FMU Registration (including assessment of FSC standard requirements and details of HCVF), Pre Planting Inspection, Distribution Acknowledgement, Post Planting Inspection, Periodic Inspection (Regular), Periodic Inspection (Need Based), Pre Harvest Inspection, Pulp Wood Supply, Post-harvest Inspection etc. This system also includes Farmers List, Transaction Summary, Weather Information. **By this well systematized mobile monitoring system, entire FMU's are visited and monitored atleast once in a year by Group entity.**

2. Corrective Action Requests

The monitoring of plantation activities will be carried out once in a year for all the FMU's by the field executives of the group entity. The Field executives issue corrective action request if any non-conformities are identified during their internal monitoring. Any corrective action issued by field executives of group entity will be assessed by higher executive cadre of the group entity (Senior Manager and above). The higher executive cadre of the group entity will verify the action taken by group member including the timelines (maximum of within 6 months) as specified in the corrective report. The format of the corrective action report is presented in Annexure.

If the corrective action is not completed, then the group member will be suspended temporarily for next three months and later will be removed permanently from the group if it is not addressed based on the non-conformity issued. The same will be intimated to the group member.

The internal monitoring results will be analysed and if any new indicator to be added in monitoring as outcome that will be added in monitoring indicators for next audit. Group Entity issue corrective action requests to address non-conformities identified during the internal monitoring and follow up their implementation.

In general, the plantations raised by group member are short rotation crops where the plantation management activities will be carried out till harvest incase of Casuarina and upto 4th year incase of Eucalyptus species. So these FMU will be treated as active management units. However, in large extent Eucalyptus plantations like Captive plantations there will not be plantation management activities after

4th year since the rotation of this species is 5 years. So these plantations may be treated as Inactive Management Unit which will be monitored as per the selection intensity of Standard.

Group entity are also in the process to use remote sensing in its plantation management system.

Though group entity visiting all the FMU's once in a year, Group Entity lower the minimum sample defined in Clause 11.4 based on the regular analysis of the results of the monitoring as per Clause 11.1 c) for each visit. However, the entire FMU will be visited and monitored atleast once in a year.

Though group entity visiting all the FMU's once in a year, Group Entity increase the calculated minimum sample for each visit when high risks are identified (e.g. unresolved substantiated land tenure or use rights disputes, High Conservation Values (HCVs) are threatened, substantiated stakeholder complaints, etc.). However, the entire FMU will be visited and monitored atleast once in a year.

Group Entity visit different management units during the internal monitoring from the ones previously visited by the certification body, unless there are pending corrective actions, complaints or risk factors that require a revisit of the same units.

12 Chain of Custody

12.1. The Group Entity shall implement a tracking and tracing system for FSC-certified products, to ensure that they are not mixed with non-certified material.

12.2. The Group Entity shall ensure that all invoices for sales of FSC-certified material include the required information (as per the applicable Forest Stewardship Standard).

12.3. The Group Entity shall ensure that all uses of the FSC trademarks are approved by their certification body in advance.

12.4. The Group Entity shall not issue any kind of certificates to their members that could be confused with FSC certificates.

NOTE: To prove that certain management units are covered by the group certificate, the member can use the list of the members of the group or a member certificate issued by the certification body. It is important that none of these documents are confused with the FSC certificate of the group held by the Group Entity.

TNPL's Response:

Group Entity is having a tracking and tracing system for FSC-certified products to ensure that they are not mixed with non-certified material (Consignment Note documents).

Group Entity ensures that all invoices for sales of FSC-certified material include the required information (as per the applicable Forest Stewardship Standard).

Group Entity ensures that all uses of the FSC trademarks are approved by their certification body in advance.

Group Entity is not issuing any kind of certificates to their members that could be confused with FSC certificates. In order to prove certain management units are covered by the group certificate, the member can use the list of the members of the group or a member certificate issued by the certification body. However, these documents will be issued in the places where it is not confused with the FSC certificate of the group held by the Group Entity.

PART III OPTIONAL INCLUSION OF FORESTRY CONTRACTORS IN GROUPS**13 Requirements for forestry contractors**

13.1. *Forestry contractors may only join an FSC FM/CoC group.*

NOTE: Forestry contractors can join more than one group, and operate under the FSC group certificate(s) but only in the management units of the group(s) that they have joined.

NOTE 2: Forestry contractors can have a separate CoC certificate to operate in management units outside the group.

NOTE 3: Upon completion of the ongoing revision of standard FSC-STD-30-010 V2-0 FSC Controlled Wood Standard for Forest Management Enterprises, this clause will be reviewed to consider the possibility for forestry contractors to also join CW/FM groups.

13.2. *The Group Entity may allocate responsibilities to conform with the applicable Forest Stewardship Standard to forestry contractors in the group, as per Clause 3.1.*

13.3. *A contract, including a declaration of consent, shall be signed by each forestry contractor wishing to join a group. In the contract, the forestry contractor shall:*

- a) commit to follow the applicable Forest Stewardship Standard and the Group Rules, and to ensure that any sub-contractors will follow them as well;*
- b) agree to allow the Group Entity, the certification body, FSC and ASI to fulfil their responsibilities;*
- c) agree that the Group Entity will be the main contact for certification;*
- d) include the agreed terms between the forestry contractor and the Group Entity.*

TNPL's Response:

The contractors are joining in FSC FM/CoC group as per their consent. They commit to follow the applicable Forest Stewardship Standard and the Group Rules, and to ensure that any sub-contractors will follow them as well. They have to agree to allow the Group Entity, the certification body, FSC and ASI to fulfil their responsibilities, Group Entity will be the main contact for certification and include the agreed terms between the forestry contractor and the Group Entity (Enlistment tender document). The contractors are enlisted to execute plantation establishment activities and harvesting based on the Purchase Order released on them on behalf of TNPL.

14 Group Rules for contractors

14.1. *The Group Entity shall adapt the Group Rules to include forestry contractors.*

14.2. *The Group Entity shall define the process for forestry contractors to report to the Group Entity the type (e.g. harvesting, planting, management plan development), location (management units of the group) and outcomes (e.g. volume harvested, number of plants planted, documents developed) of their operations.*

TNPL's Response:

Group entity is having a rule of include forestry contractors as those are fulfilling the TNPL response given in Clause No.13. The contractors are engaged based on the PO issued on them to carryout plantation activities like establishment and harvesting works. As per the PO, they will implement the activities. The contractors will inform the group entity over through phone before carrying out the activities. The field officials will visit and assess the performances of the contractors during their field visit.

15 Evaluation of new forestry contractors

15.1. *The Group Entity shall evaluate each forestry contractor applying to join the group, prior to approving the application, through:*

15.1.1. *An on-site evaluation of an operation in a sample management unit; and/or*

15.1.2. *A verification that the contractor has sufficient qualifications or knowledge to operate according to the applicable Forest Stewardship Standard and fulfil their responsibilities within the group.*

15.2. *When a forestry contractor wants to move from one group to another group managed by the same Group Entity, the Group Entity shall implement this evaluation to allow for the move.*

TNPL’s Response:

The Group Entity will evaluate each forestry contractor application during enlistment process. During enlistment process, the all the details related to joining in FSC-FM group will be given in the tender document. The contractors those are participating in the tender will provide their willingness to join in FSC-FM Group by signing the tender documents in addition they will submit their proof for experience. Accordingly, the Group entity will evaluate all the documents provided by the contractors. Those are agreed and fulfilling the terms & conditions will be qualified as enlisted contractors and to join the group. The previous experiences also will be verified through on-site evaluation of an operation in a sample management unit. By this well systematic enlistment process, the contractor will become the member of TNPL FSC-FM group.

The group entity will also verify that the contractor has sufficient qualifications or knowledge to operate according to the applicable Forest Stewardship Standard and fulfil their responsibilities within the group during contractor performances analysis. If they are lacking, then the group entity will provide sufficient training to them to impart knowledge about FSC standards on them.

Since the Group entity is managing all the members under one group, there will not be question of raising moving forestry contractor from one group to another group. If the Group entity is having more than one group in future, then it will implement this evaluation to move from group to another group managed by Group Entity.

16 Records regarding contractors

16.1. When forestry contractors are included in the group, the Group Entity shall maintain up-to-date records, including:

- a) Name and contact details;*
- b) The date of entering the group and, where relevant, the date of leaving the group, and the reason for leaving;*
- c) Any records of training provided by the Group Entity;*
- d) The results of the forestry contractors’ monitoring through the sampled management units (Clause 17.1) and the targeted internal evaluation (Clause 18.1);*
- e) Records of the harvesting and sales volumes, at least annually, if applicable, resulting from operations carried out by contractors within the group certificate.*

TNPL’s Response:

The Group Entity is maintaining the up-to-date records, including:

- a) Name and contact details;
- b) The date of entering the group and, where relevant, the date of leaving the group, and the reason for leaving;
- c) Records of training provided by the Group Entity
- d) The results of the forestry contractors’ monitoring through the sampled management units (Clause 17.1) and the targeted internal evaluation (Clause 18.1);
- e) Records of the harvesting volumes, at least annually, if applicable, resulting from operations carried out by contractors within the group certificate.

17 Internal monitoring with contractors in the group

17.1. In management units where outsourced services are carried out only by forestry contractors in the group, the Group Entity shall follow Section 11 of this standard, but instead of using Table 1 in clause 11.4, the minimum sample of management units to be visited annually for internal monitoring shall be calculated according to Table 2:

Size class Internal monitoring	Size class Internal monitoring
Active management units Communities	$X = 0.6 * \sqrt{y}$
Inactive management units	$X = 0.1 * \sqrt{y}$

Table 2: Internal monitoring sampling calculation with forestry contractors in the group.
Where: X = number of management units to be sampled;
y = number of active or inactive management units within each category.

TNPL's Response:

The Group Entity will do the internal monitoring of all the contractors once in a year with 100% sampling intensity. The Field executives issue corrective action request if any non-conformities are identified during their internal monitoring. Any corrective action issued by field executives of group entity will be assessed by higher executive cadre of the group entity (Senior Manager and above). The higher executive cadre of the group entity will verify the action taken by contractor including the timelines (maximum of within 6 months) as specified in the corrective report.

18 Internal monitoring of contractors

18.1. The Group Entity shall implement a targeted internal evaluation of all forestry contractors included in the group at least once during the validity of the certificate.

NOTE: This targeted internal evaluation is additional to the internal monitoring of the contractors' performance through the management units sampled annually (as per Clause 17.1). The objective of this evaluation is to ensure that contractors are adequately fulfilling the responsibilities that the Group Entity has allocated to them (e.g. planning, evaluation of new members, internal monitoring, development of documents).

18.1.1 The Group Entity shall increase this internal evaluation intensity when high risks are identified (e.g. recurrent non-conformities by the contractor, substantiated stakeholder complaints about the contractor's performance).

18.2 The Group Entity shall issue corrective action requests to address non-conformities identified during the monitoring of the forestry contractors and follow up their implementation.

TNPL's Response:

The Group Entity will implement a targeted internal evaluation of all forestry contractors included in the group at least once in a year during the validity of the certificate. This targeted internal evaluation is additional to the internal monitoring of the contractors' performance through the management units sampled annually (as per Clause 17.1). During targeted internal evaluation, the contractors are adequately fulfilling the responsibilities that the Group Entity has allocated to them (e.g. planning, evaluation of new members, internal monitoring, development of documents) will be verified and ensured.

19 Contractors' Chain of Custody

19.1 Forestry contractors shall have records of the annual harvesting volume and annual FSC sales volume of their harvesting and sales activities covered by the certificate of the group.

19.2 Such volume records shall be provided to the Group Entity.

19.3 Forestry contractors shall ensure that all invoices for sales of FSC-certified material include the required information (as per the applicable Forest Stewardship Standard) and provide a copy of these invoices to the Group Entity.

19.4 When selling FSC-certified material, the contractor shall use in the invoices the certificate code of the group from which the material comes from.

TNPL's Response:

The Group entity will have the contractor wise FSC 100% material harvested within the certified FMU. The Forestry contractors also having the records of the FSC 100% material harvested from their allotted FMU's covered by the certificate of the group. They will also share the same to Group entity and verify the same by raising invoices for their activities. No sales of FSC-certified material is not happened under TNPL group.

ANNEXURE-1Check List for granting FSC group membership

S.No	Category	Decision	
		Yes	No
1.	Agree to join membership of the plantation scheme		
2.	Submitted the required land documents / Legal ownership and agree to sign the bilateral agreement with FSC standards		
3.	Knowledge of FSC standards / Access to a copy of the FSC standards.		
4.	Knowledge of FSC certification process.		
5.	Agreed to access his / her forest area by the group entity or FSC officials or Certification body officials for the purposes of evaluation and monitoring.		
6.	Knowledge of Certification body's, and FSC requirements with respect to publication of information.		

Qualified for grand membership: Yes / No

Remarks (if any) : _____

Verified by**Senior Management of Plantation Department**

ANNEXURE-2
INTERNAL MONITORING REPORT

Name of Forest Management Scheme	:	
Region	:	
Taluk	:	
FMU Code	:	
FMU Name	:	
Area	:	
Year of Planting	:	
Details of Species	:	

Sl.No	Criteria	Findings
1	Awareness on FSC Principles	
2	Employment of local people for forest management activities	
3	Wages paid to labours as per prevailing local standards.	
4	Attending training program of worker safety, Health and FSC (Principle Criteria, Indicators and group procedures)	
5	Intimation to FME on work- related accidents, and preferably all safety performance.	
6	Non employment of Child labour	
7	Intimation to FME grievances related to legal rights, damage compensation and negative impacts	
8	Processing the harvesting operation locally.	
9	Minimization of waste	
10	Intimation to FME on rare, threatened and endangered species and their habitat, the FME shall use this information to protect these resources.	

11	Following silvicultural systems, pest management system		
12	Is chemicals used (Yes / No)	If Yes , Name Quantity Date of application Method of application Method of Storage Remarks (if any)	
13	Is Manure / Bio-pesticide / Bio-fungicide used (Yes / No)	If Yes , Name Quantity Date of application Method of application Method of Storage Remarks (if any)	
14	Avoidance of Chemicals prohibited by the FSC (FSC-POL-30- 601) or those banned in Europe, U.S., and India, or World Health Organization Type 1A or 1B and chlorinated hydrocarbon pesticides		
15	Safe disposal of Chemical container and other wastes.		
16	Identification of forest fire		
17	Record of any accident		
18	Occurrence of Electric wire over the plantation		
19	Efforts taken by TNPL towards protection of HCVF present if any and its effectiveness		
20	Efforts taken by TNPL to maintain the buffer zones or conservation zones present if any and its effectiveness		
21	Growth of the Plantations		
22	Ecological impacts of TNPL captive plantation activities		
23	Social impacts of TNPL captive plantation activities		



TNPL FSC FM GROUP PROCEDURES

24.	Compliances with applicable laws	
25.	Disputes and Grievances	
26.	Workers Rights Training Programme	
27.	Sexual Harassment	
28.	Long term economic viability of the plantations	
29.	Other Remarks	

Date:

Signature of Officer

ANNEXURE-3**CORRECTIVE ACTION REPORT**

Name of Forest management Scheme:

Region:

Taluk:

FMU Code:

Farmer Name:

Area:

Year of Planting:

Details of species:

SI.No	Category	Remarks
1	Identification of Non Conformance	
2	Identify by	
3	Time line for completion	
4	Action taken and Response by FMU	
5	Non Conformance	Open/Close
6	Reason for open	

Date:

Signature of Executives

ANNEXURE-3A**CORRECTIVE ACTION REPORT**

Name of Forest management Scheme:

Region:

Taluk:

FMU Code:

Contractor Name:

SI.No	Category	Remarks
1	Identification of Non Conformance	
2	Identify by	
3	Time line for completion	
4	Action taken and Response by Contractors	
5	Non Conformance	Open/Close
6	Reason for open	

Date:

Signature of Executives