

Forest Stewardship Council®







Forest Management Certification Audit Report

V02-00 - EN

Certificate holder

Certificate holder name Washington State Department of Natural Resources: South Puget

HCP Planning Unit

Address 1111 Washington St. SE, 98504-7016, Olympia,

WA, UNITED STATES

Contact person Ms. Nicole Jacobsen

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Certification body

Certification body name Bureau Veritas Certification Holding SAS

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May 14, 2018

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documents-and-standards



Certification date

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Introduction

SLIMFs: The elements marked with an asterisk (*) in this report are NOT required in the case of certificates issued to single SLIMF MU but are required for all other certificates.

Voluntary fields: The elements marked with hashtag (#) in this report are NOT mandatory but can be completed voluntarily.

Non-public fields: The elements marked with dollar symbol (\$) in this report will NOT be reproduced in the FM public summary, e.g. personal information.

Unit: Data presented in the report will be provided in metric system units. If nonmetric units are used, conversion rates will be indicated below, and an automatic conversion into metric units will be performed and stored in the cloud.

The entire report is based on the same units for one type of measure, which are selected from unit drop-down lists and the selections are synchronous across the document.

Unit of area: 1 ha equals ha ha, e.g. forest area, HCV area.

Unit of volume: 1 m3 equals 1 m3, used for wood related product.

Unit of **weight**: 1 **ton** equals 1 **metric ton**, used for non-timber products i.e. bamboo, rubber and resin.

Repeating section:

This report contains many repeating sections e.g. species, MU, non-conformities etc., please add more tables by clicking **plus (+)** button.

1. Description of forest management

Forest management	enterprise (FME) information
1.1 Type of FM certificate	Single MU
1.2 Total area under evaluation	71289 ha
1.3 Area certified both to FSC and another scheme*	PEFC 0 ha SFI 71289 ha Other Your input here ha Please specify Your input here
1.4 Male forest workers	118
1.5 Female forest workers	34
1.6 Third parties related/impacted by forest management activities	☑ Local communities☐ Traditional peoples☐ Indigenous Peoples
1.7 Third party description (existence, interests or activities etc.)*	The Washington State Department of Natural Resources (Washington DNR) manages state forest lands for a variety of public trusts (i.e., local communities) which fund state-wide school construction, universities, state institutions, and county services. Forest management is directed by the Policy for Sustainable Forests (PSF), and DNR's Habitat Conservation Plan (HCP), which is a contractual agreement with the U.S. Federal Services (United States Fish & Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) which include DNR-managed forested state trust lands within the western part of the State as well as lands on the east slopes of the

	Cascade Range. DNR carries out the planning and implementation of forest management activities through a hierarchy of planning processes. All of which is subject to a public review process by local communities.
1.8 Area of forest owned/managed but excluded from MUs in the scope of certification	According to FSC-POL-20-003 0 ha Other reasons Your input here ha Please specify
1.9 Total growing stock of broadleaves #	Your input here m3
1.10 Total growing stock of conifers #	Your input here m3
1.11 Ecosystem services(ES) in the scope	□Yes (annex B to be completed)
1.12 Change of scope since previous audit	□Yes, the scope has changed as described below:

1.	Main commercial timber s	pecies included	in scope of the certificate
1.13 Species	Thuja plicata Callitropsis nootkatensis Tsuga mertensiana Tsuga heterophylla Pseudotsuga menziesii Abies grandis Abies procera Abies amabilis Pinus contorta Pinus monticola Picea engelmannii Picea sitchensis Taxus brevifolia Alnus rubra Fraxinus latifolia Betula papyrifera Prunus emarginata Populus trichocarpa Crataegus douglasii Arbutus menziesii Acer glabrum Acer macrophyllum Quercus garryana Salix species Note: Author's name of species will not be displayed in the report, but only in the database. The "_" symbol is used instead of a space for spelling check and validation purposes.	1.14 Product code	
1.15 Trade name	none	1.16 Harvest planned in current calendar year	136256 m3
1.17 Remarks#	(volume in MBF 1 MBF = 2.3597 m3) Thuja plicata - 971 Tsuga heterophylla – 14,401	1.18 Sold with FSC Claim in	135974 m3

Pseudotsuga menziesii -38,228 Abies grandis - 13 Abies procera - 218 Abies amabilis - 224 Pinus contorta - 9 Pinus monticola - 195 Picea engelmannii - 34 Alnus rubra - 929 Populus trichocarpa - 225 Acer glabrum - 96	previous calendar year
---	---------------------------

No NTFP included in scope of certificate $\ oximes$

1.	NTFP - non-timber forest p	roduct included	in scope of the certificate
1.19 Species	Your input here (No species validation for NTFP)	1.20 Product code of NTFP	Choose an item
1.21 Trade name	Your input here	1.22 Current annual harvest	Your input here ton

No Pesticides used □

	1. Pesticide use since previous	audit/year			
1.23 Active ingredient	glyphosate	1.24 Applied area	394 ha		
1.25 Reason for use	Site preparation to control woody vegetation and grasses	1.26 Quantity of ingredient	977 Liters		
1.27 Summary of ESRA WDNR has completed a specific evaluation of pesticides used on the forest in relation to FSC-POL-30-001 v3.0. FSC US has developed an ESRA template for the noted pesticide; DNR has adopted the templates to meet their needs effective 1 September 2020					
	2. Pesticide use since previous audit/year				
1.23 Active ingredient	imazapyr	1.24 Applied area	394 ha		
1.25 Reason for use Site preparation to control woody vegetation and grasses		1.26 Quantity of ingredient	556 Liters		
1.27 Summary of ESRA WDNR has completed a specific evaluation of pesticides used on the forest in relation to FSC-POL-30-001 v3.0. FSC US has developed an ESRA template for the noted pesticide; DNR has adopted the templates to meet their needs effective 1 September 2020					
	3. Pesticide use since previous	audit/year			

1.23 Active ingredient	clopyralid	1.24 Applied area	394 ha
1.25 Reason for use	Site preparation to control woody vegetation and grasses	1.26 Quantity of ingredient	129 Liters
1.27 Summary of ESRA WDNR has completed a specific evaluation of pesticides used on the forest in relation to FSC-POL-30-001 v3.0. FSC US has developed an ESRA template for the noted pesticide; DNR has adopted the templates to meet their needs effective 1 September 2020			
	4. Pesticide use since previous	audit/year	
1.23 Active ingredient	Sulfometuron methyl	1.24 Applied area	394 ha
0 /	Sulfometuron methyl Site preparation to control woody vegetation and grasses		394 ha 83 Liters

5. Summary of forest context and management plan

Management Unit:

Management Unit (MU): A spatial area or areas submitted for FSC certification with clearly defined boundaries managed to a set of explicit long-term management objectives which are expressed in a management plan. This area or areas include(s):

- all facilities and area(s) within or adjacent to this spatial area or areas under legal title or Management control of, or operated by or on behalf of The Organization, for the purpose of contributing to the management objectives; and
- all facilities and area(s) outside, and not adjacent to this spatial area or areas and operated by or on behalf of The Organization, solely for the purpose of contributing to the management objectives. (Source: FSC 2011).

Note: the total area of MU shall be consistent with the total area under evaluation (field 1.2).

To facilitate the reporting, in the case of a large number of SLIMF, the information about the management units can be reported jointly. In such case, management units shall be grouped so that the tenure ownership, tenure management, and SLIMF type characteristics are the same for all grouped MUs.

Please click the add button for more MUs to be added.

When the number of MU is **more** than 20, CB shall upload a separate excel file to FSC database. Once uploaded, the manual input of records in the section below will be disabled.

		i.	MU		
2.38 MU name	Washington State Department of Natural Resources: South Puget HCP Planning Unit	2.39 Tenure- ownership	State	2.40 Tenure- management	State
2.41 Centroid Longitude*	47.2043 N	2.42 Centroid Latitude*	121.9915 W	2.43 SLIMF type	Non-SLIMF
2.44 Forest zone	Temperate	2.45 Natural Forest area	71289 ha	2.46 Total production forest area	65586 ha
				2.47 Total non- production forest area	5703 ha
2.48 Plantation area	0 ha	2.49 Replanted Forest area	3909 last 10 years ha	2.50 Natural regenerated forest area	14257 ha
2.51 Conservation area	41606 ha	2.52 Strictly protected area	517 ha	2.53 NTFP area	0 ha
2.54 Total area of MU (automated)	71289 ha	2.55 Annual allowable cut (AAC)	136256 m3	2.56 Area with ecosystem services claim #	0 ha

2.57 Group member name \$# (if more than one please use; as separator) Your input here

HCV list			
2.58 Main HCV attribute	2.59 Secondary HCV attribute #	2.60 HCV area	2.61 HCV description
HCV1 Species diversity	Choose an item	41606 ha	Natural areas and marbled murrulet and northern spotted owl conservation area (overlaps to significant extent with HCV3 and HCV4)
HCV3 Ecosystems and habitats	Choose an item	1057 ha	S1,S2,G1,G2 Natural Heritage plant communities (overlaps to significant extent with HCV1 and HCV4)

HCV4 Critical ecosystem services	Choose an item	33325 ha	Trust Lands within City of Tacoma Watershed; Riparian Areas (overlaps to significant extent with HCV1 and HCV3)
HCV6 Cultural values	Choose an item	517 ha	Recorded & buffered cultural resource sites

Note: The secondary HCV attribute should be completed only if two HCV attributes overlap in the same area, e.g. one piece of land is qualifies as both HCV 3 and 4. Please add rows for boundary separated HCV areas.

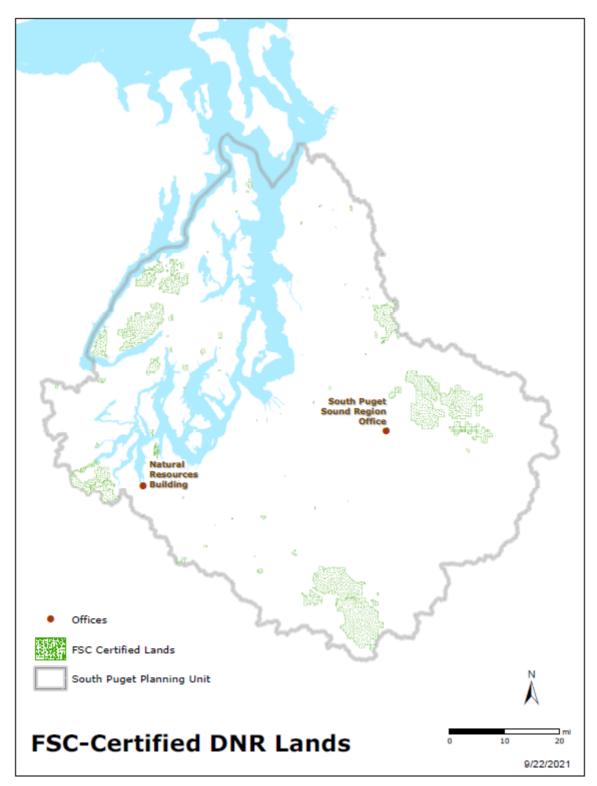


Figure 1 Forest Map of the MU

Additional flexible rich text including pictures and tables can be inserted below: #Please copy or elaborate here:

6. Normative document(s)

3.1 Evaluated international normative document(s)	Related standards: Trademark standard FSC-STD-50-001 Group standard FSC-STD-30-005 CoC standard FSC-STD-40-004 ES procedure FSC-PRO-30-006 Excision Policy FSC-POL-20-003 Pesticides Policy FSC-POL-30-001 Applicable NTFP Standard
3.2 Code(s) of NFSS or INS used	Standard Code: Your input here FSC-US Forest Management Standard (v1.1)
3.3 http link to the standard used	https://us.fsc.org/en-us/certification/forest-management-certification
3.4 If applicable, the adaptation process of CB interim standard*	Your input here

7. The evaluation process

The evaluation dates				
4.1 Audit start date	Sep 20, 2021			
4.2 Audit finish date	Sep 22, 2021			
4.3 Total person days	4.0			

Note: The total person days spent on the evaluation including time spent on remote work and time spent carrying out on-site work (incl. review of documents and records, interviewing stakeholders), but excluding travel to and from the region in which the certified forest is located.

		Personnel/audit team\$						
4.4 Name	4.5 Role	4.6 Person days prep/pre- evaluation	4.7 Person days on- site	4.8 Expertise	4.9 Auditor UAN	4.10 Profile (brief introduction of the person)		
Jim Colla	⊠Audit team leader □Team member	1.0	3.0	⊠Forestry □Ecology □Sociology	Your input here	Lead auditor on behalf of Bureau Veritas Certification. Mr. Colla is a career		

	□ Observer □ Trainee auditor □ Witnessing auditor □ ASI assessor □ Translator □ Technical expert			⊠ Environment □ Economics		forester with 45 years' experience, including 10 plus years' experience in FM evaluations.
Matthew Matwijec	□ Audit team leader □ Team member □ Observer □ Trainee auditor □ Witnessing auditor □ ASI assessor □ Translator □ Technical expert	Your input here	3.0	□ Forestry □ Ecology □ Sociology □ Environment □ Economics	Your input here	Auditor trainee and observer on behalf of Bureau Veritas Certification

	Sampling and documents
4.11 Sampling system	□1 stratified sampling
employed for the audit	□2 cluster sampling
	\square 3 random sampling
	⊠4 systematic sampling
	□5 Other, please specify Your input here
4.12 Rationale for selection of MU/ members, including a clear description of the surveillance schedule that will be implemented by the certification body	This is a single FMU with no significant change in size since the last audit. A unit are was selected that has not been visited in several years. Field sites were selected based off a range of values and indicators on tracts where activity has or will occur. Activities include harvest, road maintenance, site-preparation and planting, thinning, protection for streams and wildlife habitat, HCV and special site protection, and recreation uses.
4.13 Documentation reviewed during this audit	⊠1 copies of applicable laws ⊠2 long term management plan(s)

	 ☑ 3 technical management guides relating to operations ☐ 4 concession agreements ☑ 5 documentation showing tenure or land-use rights ☑ 6 up to date maps of roads, management sites, etc ☑ 7 inventory records ☑ 8 work instructions ☑ 9 contractor contracts ☑ 10 agreements with affected local communities ☐ 11 agreements with affected Indigenous Peoples, etc ☐ 12 records of payments of royalties, fees, or taxes ☑ 13 records of complaints/disputes and resolution ☐ 14 records of payments to workers ☑ 15 wildlife evaluation records ☑ 16 environmental impacts monitoring records
	 □ 17 social impact survey results ⋈ 18 results of monitoring forest growth and health ⋈ 19 harvesting and production records ⋈ 20 chemical use records ⋈ 21 communications with stakeholders ⋈ 22 purchasing and sales documentation ⋈ 23 Integrated pest Management ⋈ 24 ESRA
4.14 Additional techniques	⊠25 Other, please specify Habitat Conservation Plan None employed
employed for evaluation* 4.15 Geographically relevant tools employed by the auditing team for evaluation \$#	 □ 1 FSC GIS Portal □ 2 Google maps, Bing maps and similar □ 3 Global Forest Watch □ 4 GPS tracking devices □ 5 Desktop GIS tools (QGIS, ArcGIS) □ 6 CB's own GIS system ⋈ 7 CH's own GIS system □ 8 Drones, UAVs or similar □ 9 Other, please specify Your input here
4.16 Number of accidents since previous audit	0
4.17 Average wage paid to males employed in managerial positions during the last calendar year \$#	Your input here USD
4.18 Average wage paid to females employed in managerial positions during the last calendar year \$#	Your input here USD

4.19 Number of males employed in managerial positions during the last calendar year \$#	Your input here
4.20 Number of females employed in managerial positions during the last calendar year \$#	Your input here
4.21 Total number of local community members employed through management activities, including contractors, during the last calendar year \$#	Your input here
4.22 Direct costs associated with forest management* induced to comply with the requirements for FSC certification (In the case of main evaluations, all costs prior to main evaluation. In the case of surveillance evaluations, costs during the last calendar year) \$# *costs include for example, trainings, workshops, assessments, plans, censuses, guidance, etc.	Your input here

4.23 Document name and date reviewed during this audit (Free text) \$#

1. See appendix FSC Indicators Evidence (54 pages portions review September 20-22)

2.

	Audit itinerary						
4.24 Audit date	4.25 Hou rs	4.26 MUs or members	4.27 Activities	4.28 Site detail	4.29 Site type		
Sep 20, 2021	8	WDNR – South Puget Sound	Opening meeting, document and record reviews	Office setting	□ Seed orchards □ Nursery □ Protected area □ Production forest area □ Workers' amenities □ Areas used by local communities and IP □ Water courses □ Forest roads		

					☐ Chemical storage sites ☐ HCVs ☐ Monitoring sites ☐ Logging trails ☐ Restoration area ☐ Pesticide application area ☑ Office ☐ Other, please specify Your input here
Sep 21, 2021	8	WDNR – South Puget Sound	Field site inspection, stakeholder interviews	Third Chance FMA: 326049 Top Spot, Unit 3 FMA: 290375 Kristine, Unit 4 FMA: 270400 Cougar, Units 1&2FMA: 265610 & 265858 Union City, Unit 2 FMA: 169376 Don Lake RMAP Project Tip Top, Unit 2 FMA: 270343 Tip Top, Unit 1 FMA: 270342 Stavis Creek NRCA325	□ Seed orchards □ Nursery □ Protected area □ Production forest area □ Workers' amenities □ Areas used by local communities and IP □ Water courses □ Forest roads □ Chemical storage sites □ HCVs □ Monitoring sites □ Logging trails □ Restoration area □ Pesticide application area □ Office □ Other, please specify
Sep 22, 2021	8	WDNR – South Puget Sound	stakeholder interviews, document and record reviews, closing meeting	Office setting	□ Seed orchards □ Nursery □ Protected area □ Production forest area □ Workers' amenities □ Areas used by local communities and IP □ Water courses □ Forest roads □ Chemical storage sites □ HCVs □ Monitoring sites

		□Logging trails
		☐Restoration area
		☐ Pesticide application area
		□Office
		☐ Other, please specify Your input here

	Stakeholder consultation process
4.30 First stakeholder consultation date for this audit	Sep 21, 2021
4.31 Means of engagement	
	□ Virtual meetings
	⊠ Contacted by phone
	☐ Email, or letter
	\square Notice published in the national and/or local press
	☐ Notice published on relevant websites
	☐ Local radio announcements
	☐ Local customary notice boards
	☐ Social media broadcast
	☐ Other, please specify Your input here
4.32 Engaged stakeholder	⊠ Economic interests
groups	⊠ Social interests
	⊠ Environmental interests
	\square FSC-accredited certification bodies active in the country
	☑ National and state forest agencies
	☐ Experts with expertise in controlled wood categories
	☐ Research institutions and universities
	□FSC regional offices, FSC network partners, registered standard development groups and NRA working groups in the region
	⊠ Forest workers, contractors
	⊠ Local communities, residents
	☐ FME personnel
	☐ Indigenous Peoples
	☐ Other, please specify Your input here

Stakeholder comment(s)							
4.33 Stakeholder group	4.34 Stakeholder description #	4.35 Stakeholder's comment	4.36 Notified before audit?	4.37 Interviewed during this audit?	4.38 CB's follow up		

Economic interests	Timber sale purchaser	reliable supplier of the type of logs we need to run our mill			Verified on an active job, log sorting transfer of products, thank you for taking the time to talk		
Stakeholder gro	oups (automated	l from 4.33)					
Local communities, residents	Adjacent landowner	We note WDNR is planning a sale along our property line, we are glad to see it to reduce fire hazard but are concerned about trespass and damage			Verified on site the property line well marked as a buffers; the audit team will follow up on this activity to confirm it is Ok next audit, thank you for participating in the field tour		
Stakeholder gro	oups (automated	f from 4.33)					
Forest workers, contractors	Logging contractors and crews, road contractor	Sales are well laid out, foresters provide the direction we need, it's hard to find workers			Verified on multiple active sites in the field, thank you for time		
Stakeholder gro	oups (automatec	If from 4.33)					
Local communities, residents	Angler	This is a good spot to fish and picnic			Thank you for your feedback.		
Stakeholder groups (automated from 4.33)							
Environmental interests	Conservation NGO	WDNR is a great conservation partner, their staff are excellent.			Thank you for your feedback		
Stakeholder gro	Stakeholder groups (automated from 4.33)						

No complaints received oxtimes

Complaint(s) received\$						
4.39 Rece ived date	4.40 First rece ived by	4.41 Compl ainant	4.42 Complaint detail	4.43 Open/ Closed	4.44 Actions	4.45 Close date
	Cho ose an item	Your input here	Your input here	Choos e an item	Your input here	Your input here

8. Audit findings

No NCRs raised □

Previous Nonconformities/Observations raised			
5.1 Unique Finding number	01	5.2 Due date	Sep 3, 2019
5.3 Issue date	Sep 4, 2018	5.4 Close date	Nov 11, 2018
5.5 Grading	Minor	5.6 Open/closed	Closed
5.7 Standard	NFSS	5.8 Clause	1.6.a

5.9 Requirement

The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.

5.10 Description of audit finding

The Washington Department of Natural Resources is a state agency which is required to abide by all State laws and regulations. These laws and regulations cover all aspects of the FSC Policy of Association (FSC-POL-01-004). The State cannot sign off or endorse the Policy of Association as it relates to an international treaty that has yet to be ratified by the federal government.

5.11 Corrective action taken by the auditee

Washington DNR will continue to analyze the potential legal consequences that signing the PfA/Annex C might have for our operations, our certificate, and our stakeholders. Between now and the Washington DNR's 2018 FSC audit, the agency will seek further information.

- 1. What is the expected release date of the Policy for Association, Version 3?
- 2. Engage the State Attorney General's office, DNR executive management, and/or staff experts as needed to re-evaluate previously identified concerns associated with the HCVF and ILO language in the existing PFA.

5.12 CB's review to corrective actions

Given the regulatory conflict with US and State of Washington law; the fact the policy of association is being revised to address the noted issues, and WDNRs efforts to continue the monitor the situation and engage stakeholders; it is appropriate to close the finding but continue to monitor the situation and consult with stakeholders.

Previous Nonconformities/Observations raised			
5.1 Unique Finding number	02	5.2 Due date	Oct 16, 2020
5.3 Issue date	Oct 17, 2019	5.4 Close date	Sep 23, 2020
5.5 Grading	Minor	5.6 Open/closed	Closed
5.7 Standard	NFSS	5.8 Clause	4.2.b
500			

5.9 Requirement

The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.

5.10 Description of audit finding

The Washington Department of Natural Resources is a state agency which is required to abide by all State laws and regulations. These laws and regulations cover all aspects of the FSC Policy of Association (FSC-POL-01-004). The State cannot sign off or endorse the Policy of Association as it relates to an international treaty that has yet to be ratified by the federal government. During the surveillance audit logging road construction crews in NISQUALLY VDT, VRH & RMZ were not wearing full PPE (hard hats, high vis) when the workers got out of their equipment. Interviews with DNR staff confirmed they were not consistently enforcing health and safety requirements outlined in the Timber Sales contracts.

State law regulation WAC 296-54 indicates logging operations, including road construction, must always have proper and appropriate PPE on "whenever there is the potential exposure to danger of flying or falling objects" unless they are in the equipment cab. There is an expectation with FSC certification that is clearly stated in the Guidance for Criteria 4.2 (i.e. PPE being worn) is demonstration that the Forest Manager is meeting and/or exceeding legal requirements. Auditors interviewed DNR staff and found they were unclear if they had authority to enforce health and safety requirements on sub-contractors.

5.11 Corrective action taken by the auditee

DNR training committee has clarified proper PPE use by purchasers and contractors, communicated safety expectations with purchasers and contractors; and identified a range of compliance options when working with contractors and subcontractors that scale with the severity of the problem. An updated statewide pre-work conference form has been developed to include a check of contractors' accident protection plans, discussion of relevant WACs, etc.

5.12 CB's review to corrective actions

During field inspection of Double Span Timber sale the auditor confirmed the presence of a prework conformance form noting safety elements. Direct observation and interview confirms potential safety hazards understood, full PPE in use and functions therein understood.

Previous Nonconformities/Observations raised			
5.1 Unique Finding number	Your input here	5.2 Due date	Your input here
5.3 Issue date	Your input here	5.4 Close date	Your input here
5.5 Grading		5.6 Open/closed	
5.7 Standard		5.8 Clause	
5.9 Requirem	ent		
5.10 Descripti	on of audit finding		
5.11 Correctiv	ve action taken by the auditee		
E 40 OD!-	:		
5.12 CB's review to corrective actions			
Your input he	le .		
9. Cert	ification decision		

Peer review required? \square Yes.

Certification decision		
6.5 Difficulties identified during the evaluation	None	
6.6 Conditions (corrections of minor non-conformities) or pre-conditions (corrections of major non-conformities) associated with the certification decision	No specific condition If other, please specify Your input here	
6.7 Lead auditor opinion	☑ The certificate holder's system of management, if implemented as described, is capable of ensuring that all of the requirements of the applicable standard(s) are met over the whole forest area covered by the scope of the evaluation.	
	☐ The certificate holder has demonstrated, subject to correction of the identified non-conformities, that the described system of management is being implemented consistently over the whole forest area covered by the scope of the certificate.	
6.8 Auditor recommendation for the certificate holder's management system and performance	Other If other, please specify Continued certification	
6.9 Certification decision	Maintain	
6.10 Decision detail	Bureau Veritas Certification decides that the FSC FM certificate of WASHINGTON STATE DEPARTMENT OF NATURAL RESOURCES: SOUTH PUGET HCP PLANNING UNIT, US, is maintained. There are no open non-conformities.	
6.11 Decision date	Apr 17, 2022	
6.12 Decision making entity	FSC FM HUB of Bureau Veritas Certification	

10. Annex A - Certification Body's Checklist or Appendix

Note: flexible for free insert and editing, not consumed by database, including clear and systematic presentation of the observations and considerations on which the certification decision is based at criterion OR indicator level. This Annex can be replaced by separate file.

Annex A attached