

Certified by:



SmartWood Headquarters
65 Millet St. Suite 201
Richmond, VT 05477 USA
Tel: 802-434-5491
Fax: 802-434-3116

www.smartwood.org

Contact person: Jon Jickling
jjickling@ra.org

Audit Managed by:

NEPCon

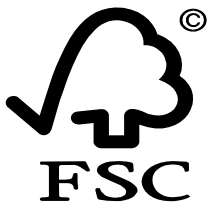
Odensegade 4B, 8100 Århus, Denmark

Tel: +4586180866

Fax: +4586181012

Contact person: Michael Jakobsen

Email: mkj@nepcon.net



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SmartWood

Practical conservation through certified forestry

Forest Management Certification Assessment Report for:

Vejle Kommune
(Vejle Municipality) in
Vejle, Denmark

Certificate code: SW-FM/CoC-2164
Auditors: Flemming Sehested
Audit Dates: 23-24. Aug. 2006
Report: 12 DEC 2006
Finalized:

Operation: Forest Ranger Lars Rasmussen
Contact:
Address: Skolegade 1, DK-7100 Vejle

TABLE OF CONTENTS

INTRODUCTION.....	3
1. SCOPE OF THE CERTIFICATE	4
1.1. SCOPE OF THE CERTIFICATE	4
1.2. EXCLUSION OF AREAS FROM THE SCOPE OF CERTIFICATE.....	4
2. ASSESSMENT PROCESS.....	5
2.1. CERTIFICATION STANDARD USED	5
2.2. ASSESSMENT TEAM AND QUALIFICATIONS.....	5
2.3. REPORT PEER REVIEWERS	5
2.4. ASSESSMENT SCHEDULE (INCLUDING PRE-ASSESSMENT AND STAKEHOLDER CONSULTATION).....	5
2.5. EVALUATION STRATEGY.....	5
2.6. STAKEHOLDER CONSULTATION PROCESS	6
3. ASSESSMENT FINDINGS AND OBSERVATIONS.....	8
3.1. STAKEHOLDER COMMENTS RECEIVED	8
3.2. MAIN STRENGTHS AND WEAKNESSES	8
3.3. IDENTIFIED NON-CONFORMANCES AND CORRECTIVE ACTIONS	10
3.4. OBSERVATIONS	13
3.5. CERTIFICATION RECOMMENDATION.....	13
4. CLIENT SPECIFIC BACKGROUND INFORMATION	15
4.1. OWNERSHIP AND LAND TENURE DESCRIPTION	15
4.2. LEGISLATIVE AND GOVERNMENT REGULATORY CONTEXT	15
4.3. ENVIRONMENTAL CONTEXT	15
4.4. SOCIOECONOMIC CONTEXT.....	15
APPENDIX I: Public summary of the management plan.....	16

INTRODUCTION

This report presents the findings of an independent certification assessment conducted by a team of specialists representing the SmartWood Program of the Rainforest Alliance. The purpose of the assessment was to evaluate the ecological, economic and social performance of Vejle Kommune forest management as defined by the Forest Stewardship Council.

This report contains four main sections of information and findings and several appendixes. The whole report plus appendixes I will become public information about the forest management operation that may be distributed by SmartWood or the Forest Stewardship Council (FSC) to interested parties. The remainder of the appendixes are confidential, to be reviewed only by authorized SmartWood and FSC staff and reviewers bound by confidentiality agreements.

The purpose of the SmartWood program is to recognize conscientious land stewardship through independent evaluation and certification of forestry practices. Forestry operations that attain SmartWood certification may use the SmartWood and FSC labels for public marketing and advertising.

This is a shortened English version of the public summary. The full version is available in Danish only.

Standard Conversions

1 acre = 0.405 hectares
1 foot = 0.3048 Meters
1 mile = 1.60934 Kilometers

1 mbf = 5.1 m³
1 cord = 2.55 m³
1 Gallon (US) = 3.78541 Liters

1. SCOPE OF THE CERTIFICATE

1.1. Scope of the certificate

The total area managed by the client (Skov & Park) is 796.57 ha. Of this area 723.05 ha are part of the certification.

- The certified forest areas are owned by Vejle Kommune and are managed by "Skov & Park". The forests are open to the public and have a location close to the town of Vejle. The forests are visited frequently (1,5-2,0 million hours of visits annually).
- The management of the forests is adapted to the requirements of the visitors

1.2. Exclusion of areas from the scope of certificate

X	Applicability of FSC partial certification and excision policy		
<input type="checkbox"/>	All forest land owned or managed by the FME is included in the scope of this evaluation.		
<input type="checkbox"/>	FME owns and/or has management involvement in other forest land/properties (forest management units) not being evaluated. Provide description of other forests below:		
<input checked="" type="checkbox"/>	Is any portion of the forest management unit (s) under evaluation for certification being excluded? If yes, complete all sections below.		
Comments / Explanation for exclusion:	The total area not included is in the present report is 73,52 ha. See justification and details in the table below:		
Control measures	All areas are without forest growth, or have been given to another party under long term rental.		
Other Forest area		Location	Size (ha)
Munkebjerg Hotel		312, del af 303 b	5,37
Golfbanerne		-	14.43
Sønderdalen & Sønderskoven		266 m and 285 g,p,q	46.31 and 7.41

2. ASSESSMENT PROCESS

2.1. Certification Standard Used

The evaluation of Vejle Kommunes forests is based on the "Standard for FSC Certificering i Danmark fra november 2004". The Standard can be downloaded from: <http://www.fsc.dk/index.php?id=108>

Local adaptation: none

2.2. Assessment team and qualifications

Lead Assessor Flemming Sehested, NEPCon. Flemming Sehested is educated as "Skov- og Landskabsingeniør" (forest engineer) from "Skovskolen" and he holds a M.Sc. in forestry from Oxford Universitet in England. He has professional experience and relevant training within a number of certification systems: PEFC, FSC, ISO 9001, ISO 14001, and MTCC. Furthermore, he has comprehensive experience from practical forestry in Denmark and from international consultancy work.

2.3. Report peer reviewers

It is up to the assessment of the certification body to deem if an independent peer review is required. In this case the assessment is simple - and therefore an external review has not been made.

2.4. Assessment schedule (including pre-assessment and stakeholder consultation)

Date	Location /main sites	Main activities
22. august 2006	NEPCon office	Review of documents
23. august 2006	Main office	Introduction, interview
23. august 2006	Forest	Field visits selected areas
24. august 2006	Forest	Field visits selected areas
24. august 2006	Main office	Interview
24. august 2006	Main office	Final meeting
Total number of person days used for the audit:2 = number of auditors participating 1 times total number of days spent for the audit 2		

2.5. Evaluation strategy

The evaluation was conducted based on the Danish FSC Standard and the following documents:

- FSC-POL-20-101 SLIMF Streamlined Certification Procedures: summary
- FSC-POL-20-100 SLIMF Eligibility Criteria.

Before the main assessment the team member reviewed several strategies, management plans, and the Danish FSC-guidelines. The fulfilment of several indicators could be confirmed based on these documents. During the field visits, the auditor focussed on areas which needed field visits and interview to complete the assessment.

List of management aspects reviewed by assessment team:

Type of site	Sites visited	Type of site	Sites visited
Road construction		Illegal settlement	
Soil drainage		Bridges/stream crossing	
Workshop		Chemical storage	
Tree nursery		Wetland	2
Planned Harvest site		Steep slope/erosion	
Ongoing Harvest site		Riparian zone	
Completed logging	1	Planting	
Soil scarification		Direct seeding	
Planting site	2	Weed control	
Felling by harvester		Natural regeneration	2
Felling by forest worker		Endangered species	
Skidding/Forwarding		Wildlife management	
Clear felling		Nature Reserve	3
Shelterwood management		Key Biotope	
Selective felling		Special management area	6
Sanitation cutting		Historical site	1
Pre-commercial thinning		Recreational site	3
Commercial thinning		Buffer zone	
Logging camp		Local community	

2.6. Stakeholder consultation process

The purpose of the stakeholder consultation strategy for this assessment was threefold:

- 1) To ensure that the public is aware of and informed about the assessment process and its objectives;
- 2) To assist the field assessment team in identifying potential issues; and,
- 3) To provide diverse opportunities for the public to discuss and act upon the findings of the assessment.

This process is not just stakeholder notification, but wherever possible, detailed and meaningful stakeholder interaction. The process of stakeholder interaction does not stop after the field visits, or for that matter, after even a certification decision is made. SmartWood welcomes, at any time, comments on certified operations and such comments often provide a basis for field assessment.

In the case of Vejle Kommune prior to the actual assessment process, a public consultation stakeholder document was developed and distributed by email, FAX and mail. Through input from the management director of Vejle Kommune and their homepage an initial list of stakeholders was developed and public announcements were distributed to them. This list also provided a basis for the assessment team to select people for interviews (in person or by telephone or through email). Public meetings were also held and written surveys were distributed to gather stakeholder input.

A number of local stakeholders were identified through dialogue with the responsible persons of the forest management and the homepage of Vejle Kommune. The stakeholders include local organisations within nature and environment, hunting, angler, civil issues, and unions.

Stakeholder Type (NGO, government bodies, local inhabitant, contractor etc.)	Stakeholders Notified (#)	Stakeholders consulted directly or provided input (#)
NGOs		3
Local Community members		2
Govt agency		
Union		1
FSC and PEFC Denmark	2	

3. ASSESSMENT FINDINGS AND OBSERVATIONS

3.1. Stakeholder comments received

The stakeholder consultation activities were organized to give participants the opportunity to provide comments according to general categories of interest based upon the assessment criteria. The table below summarizes the issues identified by the assessment team with a brief discussion of each based upon specific interview and/or public meeting comments.

FSC Principle	Stakeholder comment	SmartWood response
P1: FSC Commitment and Legal Compliance		
P2: Tenure & Use Rights & Responsibilities		
P3 – Indigenous Peoples’ Rights	Not relevant in Denmark	
P4: Community Relations & Workers’ Rights	<p>Kommentar 4A, faglig organisation (Kriterium 4.2, indikator 4.2.1-4.2.13):</p> <p>Neither the central nor local workers unions had comments or objections to the certification of Vejle Kommune.</p>	Not required
P5: Benefits from the Forest		
P6: Environmental Impact		
P7: Management Plan		
P8: Monitoring & Assessment		
P9: Maintenance of High Conservation Value Forest		
P10 - Plantations		

3.2. Main strengths and weaknesses

Principle	Strengths	Weaknesses
P1: FSC Commitment and Legal Compliance	<ul style="list-style-type: none"> • Good knowledge about laws and regulations etc. • Good implementation of laws etc. • Good knowledge to international 	

	<ul style="list-style-type: none"> agreements • Good control with use of local forests • Appropriate action is taken when unauthorized use of the forest is reported 	
P2: Tenure & Use Rights & Responsibilities	<ul style="list-style-type: none"> • Clear ownership • Established use-rights are secured 	<ul style="list-style-type: none"> • Because many private properties are adjacent to the forest areas, there is a ongoing risk for conflict related to borders of ownership. See OBS 01/06
P3 – Indigenous Peoples’ Rights	Not relevant	Not relevant
P4: Community Relations & Workers’ Rights	<ul style="list-style-type: none"> • Educated and trained staff • Security equipment is used • Good employment conditions • Local council "brugerråd" established • Historic sites protected • Recerational activites considered and prioritized 	
P5: Benefits from the Forest	<ul style="list-style-type: none"> • Increased focuss on native species Well developed sale system • Environmental rules rlated to forest machinery • Well developed sale system • Recreational values etc prioritized • "Close to nature" management of forests almost complete 	
P6: Environmental Impact	<ul style="list-style-type: none"> • Control of problematic recreational activities • Many areas well protected • Staff concious regarding nature protection and environmental rules • Biodiversity trees are protected • "Close to nature" management of forests almost complete • Natural regeneration commonly used • Re-establishment of wetlands • Abolishment of drainage. • No use of pesticides • No use of fertilizer • No use of biolocial pest control • No use of genetical modified species • Limited and controled use of exotic species 	<ul style="list-style-type: none"> • Well developed sale system Not all sites for protected species are protected • Old forest with natural origin not registered <p>CAR 01/06</p> <ul style="list-style-type: none"> • No procedures for elimination of erosion <p>CAR 02/06</p>
P7: Management Plan	<ul style="list-style-type: none"> • Good management plan • Continuos update of maps etc. • Educational programme for staff 	<ul style="list-style-type: none"> • No system or plan for registration of endangred species • No mapping of areas which need protection for biodiversity <p>CAR 01/06</p>
P8: Monitoring & Assessment	<ul style="list-style-type: none"> • Ongoing revision of management plan • Control with timber harvest and sale • Management action well documented. 	<ul style="list-style-type: none"> • No system or plan for monitoring of endangred species. <p>CAR 01/06</p> <ul style="list-style-type: none"> • No system or plan for sale of certified products <p>CAR 03/06</p>
P9: Maintenance	<ul style="list-style-type: none"> • Good protection of High Conservation 	<ul style="list-style-type: none"> • HCVF insufficient mapped

of High Conservation Value Forest	Value Forest (HCVF) • Relevant information open to the public	<ul style="list-style-type: none"> • Incomplete guidelines for HCVF • Missing total planning for HCVF CAR 01/06
P10 - Plantations	Not relevant	Not relevant
Chain of custody	<ul style="list-style-type: none"> • Good control of forest products at time of sale • Detailed information regarding place of harvest, volument, transport and sale 	<ul style="list-style-type: none"> • Missing procedure for use of FSC's logo and trademark CAR 04/06 <ul style="list-style-type: none"> • Missing procedure for presentation of annual sale reports CAR 05/06
Group Certification Requirements	-	-

3.3. Identified non-conformances and corrective actions

A non-conformance is a discrepancy or gap identified during the assessment between some aspect of the FME's management system and one or more of the requirements of the forest stewardship standard. Depending on the severity of the non-conformance the assessment team differentiates between major and minor non conformances.

- **Major non-conformance** results where there is a fundamental failure to achieve the objective of the relevant FSC criterion. A number of minor non-conformances against one requirement may be considered to have a cumulative effect, and therefore be considered a major non-conformance.
- **Minor non-conformance** is a temporary, unusual or non-systematic non-conformance, for which the effects are limited.

Major non conformances must be corrected **before** the certificate can be issued. While minor non-conformances do not prohibit issuing the certificate, they must be addressed within the given timeframe to maintain the certificate.

Each non-conformance is addressed by the audit team by issuing a corrective action request (CAR) CARs are requirements that candidate operations must agree to, and which must be addressed, within the given timeframe of a maximum of one year period.

CAR 01/06	Reference Standard & Criteria: 6.2.1; 7.1.1; 8.2.1; 9.1.2; 9.3.1; 9.4.1
Non-conformance	<p>Vejle kommune has not implemented the registration of all types of key biotopes (<i>indicator 6.2.1</i>) in the district. A number of important biotopes has been registered and mapped and included to a large extent into the management plan. However, there are still a number of biotopes which are not systematically registered and mapped. Therefore, the requirement of registration and mapping of HCV forests (<i>indicator 9.1.2</i>) is not fully implemented as well.</p> <p>Both the management plan and more general strategies are missing action plans for identification of rare and endangered species (<i>indicator 7.1.1 pkt. G</i>) on an operational level. However, Veile Kommune has planned to implementen systems to register among</p>

	Minor	
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Corrective Action Request:

1. Vejle Kommune shall elaborate a plan/strategy to collect data regarding rare and endangered species on the certified areas
2. Vejle Kommune shall document adequate monitoring of vulnerable flora and fauna, key biotopes and other high conservation value forest to secure the specific biological value of these forests
3. Vejle Kommune shall document that registration and mapping of key biotopes of the two districts key biotopes. However, with the exception of biotopes which are protected by guidelines in the mangement of the forest and protected as part of this management. This is independent of being developed as key biotopes or not. Documentation of these guidelines is required for the latter cases.
4. Vejle Kommune shall establish guidelines for the management of HCV forest according to the specific value of these areas
5. Vejle Kommune shall map areas of "old-growth" forest and other valuable forests in relation to biodiversity protection

Timeline for conformance:	Prior to next annual audit
Evidence to close CAR:	Pending
CAR Status:	OPEN
Follow-up Actions (if app.):	

CAR 02/06	Reference Standard & Criteria: 6.5.1
Non-conformance	The forest is located in a hilly landscape, and therefore the risk of erosion during harvest, establishment of tracks and roads, and other mechanical forest operations is considerable. Vejle Kommune has no written procedures to control erosion.
Minor	

Corrective Action Request:

Vejle Kommune shall elaborate written guidelines to control erosion, minimizing damage as part of harvest activities, trail and road construction, protection of water areas and include them into the management plan of the forest.

Timeline for conformance:	Prior to next annual audit
Evidence to close CAR:	Pending
CAR Status:	OPEN
Follow-up Actions (if app.):	

CAR 03/06	Reference Standard & Criteria: 8.3.1
Non-conformance	The sale-system of Vejle Kommune does fulfil the majority of requirements related to CoC certification. However, a procedure is missing to include information related to

	Minor	
Corrective Action Request: Vejle Kommune shall establish a system which ensures that only wood from the certified area can be sold as certified. Furthermore, that the code of the district's certification code (SW-FM/COC-XXXX) and the text "FSC Pure" is added all sale documents for certified products.		
Timeline for conformance:	Prior to first sale of certified products, but not later than next annual audit.	
Evidence to close CAR:	Pending	
CAR Status:	OPEN	
Follow-up Actions (if app.):		

CAR 04/06	Reference Standard & Criteria: CoC 9	
Non-conformance	No system is established that ensures that all use of FSC/SW trademarks as well as public information related to certification is presented to NEPCon/SmartWood for approval.	
	Minor	
Corrective Action Request: Vejle Kommune shall establish a system that ensures that all use of FSC/SW trademarks as well as public information related to certification is presented to NEPCon/SmartWood for approval.		
Timeline for conformance:	Prior to the use of FSC/SW trademark and logo but not later than prior to next annual audit	
Evidence to close CAR:	Pending	
CAR Status:	OPEN	
Follow-up Actions (if app.):		

CAR 05/06	Reference Standard & Criteria: CoC 10	
Non-conformance	No procedures are established to prepare an annual sales report which has to be sent to SmartWood.	
	Minor	
Corrective Action Request: Vejle Kommune shall establish a procedure to prepare an annual sales report which has to be sent to SmartWood. The report shall contain monthly sales information which shows the volume of each certified product specified to single customers.		
Timeline for conformance:	Prior to next annual audit	
Evidence to close CAR:	Pending	
CAR Status:	OPEN	
Follow-up Actions (if app.):		

3.4. Observations

Observations are very minor problems or the early stages of a problem which does not of itself constitute a non-conformance, but which the auditor considers may lead to a future non-conformance if not addressed by the client. An observation may be a warning signal on a particular issue that, if not addressed, could turn into a CAR in the future (or a pre-condition or condition during a 5 year re-assessment).

OBS 01/06	Reference Standard & Requirement: 2.2.1
<p>OBS 01/06: A recent legal case has given ownership to a neighbour of the forest assessed. At the same time a parking area had to be removed which was established. The recent review of all boundaries may lead to more legal cases.</p> <p>Vejle Kommune considers at establish a routine which implements a review of boundaries each 20 years in order to avoid that neighbours gain a prescriptive right to forest areas. This will be considered during the next audit.</p>	
Observation: see above	
OBS 02/06	Reference Standard & Requirement: 6.2.4 and 6.2.5
<p>The goal is to leave up to 8,000 m3 standing volume over a ten year period. This goal is preliminary and will be expected to be finally established within the next 1-2 years. Vejle Kommune has elaborated general guidelines to identify biodiversity trees for natural decay. However, specific selection criteria are missing. It is recommended that Vejle Kommune prepares guidelines including criteria to select and protect biological valuable trees.</p>	
Observation: see above	

OBS 03/06	Reference Standard & Requirement: 6.3.7
<p>In general it appears that the district considers the protection of streams and lakes during harvest and logging operations. However, in some cases waste wood was found in streams. It is recommended that the management emphasises the importance to remove such waste immediately towards its employees.</p>	
Observation: see above	

OBS 04/06	Reference Standard & Requirement: 6.3.8
<p>First signs of overgrowing of a forest meadow in Sønderskoven was found. It is recommended to remove the growing plants before the biotope is altered more.</p>	
Observation: see above	

3.5. Certification Recommendation

Based on a thorough review of FME performance in the field, consultation with stakeholders, analysis of management documentation or other audit evidence the SmartWood assessment team recommends the following:

Certification requirements met, certificate should be issued	<input checked="" type="checkbox"/>
Certification requirements not met, major CARs must be met prior to certificate issuance.	<input type="checkbox"/>
FME has demonstrated that their described system of management is being implemented consistently over the whole forest areas covered by the scope of the evaluation	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments:	
FME's management system, if implemented as described, is capable of ensuring that all the requirements of the certification standards are met across the scope of the certificate	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments:	
Issues identified as controversial or hard to evaluate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments:	
Certificate type recommended:	<input checked="" type="checkbox"/> Forest management and Chain of custody <input type="checkbox"/> Forest management only (no CoC)

In order to maintain certification, the FME will be audited annually on-site and required to remain in conformance with the FSC principles and criteria as further defined by regional guidelines developed by SmartWood or the FSC. The FME will also be required to fulfill the corrective actions as described below. Experts from SmartWood will review continued forest management performance and conformance with the corrective action requests described in this report, annually during scheduled and/or random audits

4. CLIENT SPECIFIC BACKGROUND INFORMATION

4.1. Ownership and land tenure description

The owner of the certified area is Vejle Kommune. The area is managed by Skov & Park. An additional area is expected to be added soon (app. 200 ha). Because the forests have public ownership, public access is allowed according to "Skovloven". - This includes access at any time during the day and night as well as the right to collect berries and mushrooms on a non-commercial basis.

4.2. Legislative and government regulatory context

-

4.3. Environmental Context

The total forested area is app. 650 ha. Deciduous trees make out app. 85% with beech and oak being most important.

The district holds important biodiversity values, among them Natura 2000 areas, natural forest, §3-areas and streams as well as rare or endangered plant and animal species. The district actively protects and establishes a number of nature areas. Also, the forests are an important component of the landscape and nature value along Vejle Fjord. The steep hills are difficult to access and in potential danger of erosion. The growth potential is high and natural regeneration happens with little efforts. Most areas are managed with selective felling which is the best management both for economic and environmental reasons.

4.4. Socioeconomic Context

The district is not of any particular importance for the income of the local community close to it. However, the district plays a major role in offering recreational activities. The district is in dialogue with local stakeholders, for example "Grønt Forum". "Grønt Forum" is an umbrella organisation for app. 60 organisations in Vejle interested in nature and environment. The goal is to create local interest and participation in these issues in Vejle.

APPENDIX I: Public summary of the management plan

(NOTE: To be prepared by the client prior to assessment, Information verified by assessment team)

<p>Main objectives of the forest management are: Primary priority: recreation and outdoor activities Secondary priority: biodiversity and increasing of nature values Other priorities: Maintained as investment to increase the value; ;</p>																			
<p>Forest composition: The district has a very high percentage of deciduous trees (app 85%). Beech is the main species whereas oak and other deciduous species make out a major part of the forest. Among conifers Norway Spruce is the main species.</p>																			
<p>Description of Silvicultural system(s) used:</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center; width: 70%;">Silvicultural system</th> <th style="text-align: center; width: 30%;">% of forest under this management</th> </tr> </thead> <tbody> <tr> <td>Even aged management</td> <td style="text-align: center;">- ha</td> </tr> <tr> <td> Clearfelling (clearcut size range)</td> <td style="text-align: center;">ha</td> </tr> <tr> <td> Shelterwood</td> <td style="text-align: center;">ha</td> </tr> <tr> <td>Uneven aged management</td> <td style="text-align: center;">ha</td> </tr> <tr> <td> Individual tree selection</td> <td style="text-align: center;">ha</td> </tr> <tr> <td> Group selection (group harvested of less than 1 ha in size)</td> <td style="text-align: center;">ha</td> </tr> <tr> <td>Other types of management (explain)</td> <td style="text-align: center;">ha</td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table>		Silvicultural system	% of forest under this management	Even aged management	- ha	Clearfelling (clearcut size range)	ha	Shelterwood	ha	Uneven aged management	ha	Individual tree selection	ha	Group selection (group harvested of less than 1 ha in size)	ha	Other types of management (explain)	ha		
Silvicultural system	% of forest under this management																		
Even aged management	- ha																		
Clearfelling (clearcut size range)	ha																		
Shelterwood	ha																		
Uneven aged management	ha																		
Individual tree selection	ha																		
Group selection (group harvested of less than 1 ha in size)	ha																		
Other types of management (explain)	ha																		
<p>Harvest methods and equipment used: Forest workers and machinery</p>																			
<p>Estimate of maximum sustainable yield for main commercial species: 4300 m³ expected, harvest 3000 m³</p>																			
<p>Explanation of the assumptions (e.g. silvicultural) upon which estimates are based and reference to the source of data (e.g. inventory data, permanent sample plots, yield tables) upon which estimates are based upon. The growth estimate is based on either real data collected in the forest and standard tables based on large numbers of trees to allow a high degree of statistical verification. Electronic management tools assist in making automatic adjustments of growth data after harvest.</p>																			
<p>FME organizational structure and management responsibilities from senior management to operational level (how is management organized, who controls and takes decisions etc.) Skov & Park is managing the forest in accordance with "Vejle Kommunes Skovpolitik for det 21. århundrede" and "Skovlovens bestemmelser om god og flersidig skovdrift". Skov & Park belongs under "Teknisk Forvaltning" with reference to "Natur- og Miljøudvalget". The responsibility for the daily management is under the forest ranger.</p>																			
<p>Structure of forest management units (division of forest area into manageable units etc.) Litra system</p>																			
<p>Monitoring procedures (including yield of all forest products harvested, growth rates, regeneration, and forest condition, composition/changes in flora and fauna, environmental and social impacts of forest management, costs,</p>																			

productivity and efficiency of forest management)

Harvest is registered in electronic mode, whereas volume is registered through an ongoing field assessment as well as by continuous monitoring in the forest. A register "Bevoksningsregister" is updated continuously. A main revision is made for every ten years.

Vejle Kommune takes responsibility for some overall management of the forest by setting goals according to different laws and regulations. This includes registration of nature types important for the protection of biodiversity, endangered species and historic sites as well as management plans.

No procedures exist for monitoring of important areas for biodiversity conservation. However, the implementation of this is planned. Furthermore, observations of relevance for nature protection are made by staff and visitors.

Environmental protection measures, e.g. buffer zones for streams, riparian areas, etc., protection measures for Rare Threatened and Endangered Species and habitat

Part of the relevant registration is made. It is planned to enlarge areas for protection.

Other Sections may be added by the FME