Sustainable Forestry Initiative®
Forest Management Audit Report

State of Wisconsin: Wisconsin Department of Natural Resources – State Forests and Lands

Certificate # SCS-SFI/FM-000070

SFI 2022 Standards and Rules®, Forest Management
Recertification Audit

Client Address	101 S. Webster Street, PO Box 7921, Madison, WI 53707-7921 USA
Client Contact	Teague Prichard, Teague.Prichard@wi.gov
Client Website	dnr.wi.gov/topic/forestry.html

SCS Contact:
Maggie Schwartz
Managing Director, Forestry
Natural Resources Division
mschwartz@scsglobalservices.com

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SFI® Forest Management Standard

SECTION A – PUBLIC SUMMARY

Foreword

Organization of the Report

This report on the results of your audit assessment is divided into two sections. Section A provides the public summary and background information that is required by the Sustainable Forestry Initiative® Section A is made available to the public and is intended to provide an overview of the audit process, the management programs and policies applied to the forest, and the results of the audit. Section A will be posted on the SFI website and Section B contains more detailed results and information for required SFI record-keeping or for use by the Certified Organization.

Principles of SFI Forest Management

The SFI 2022 Standards and Rules® for Forest Management promotes sustainable forestry and includes measures to *protect water quality, biodiversity, wildlife habitat, species at risk and Forests with Exceptional Conservation Value.*

The 13 *SFI Principles* for Forest Management are:

1. **Sustainable Forestry:** To practice sustainable forestry to meet the needs of the present while promoting the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing and harvesting of trees for useful products and ecosystem services such as the conservation of soil, air and water quality, climate change mitigation, biological diversity, wildlife and aquatic habitats, recreation and aesthetics.

2. **Forest Productivity and Health:** To provide for regeneration after harvest and maintain the productive capacity of the forest land base, and to protect and maintain long-term forest and soil productivity. In addition, to protect forests from economically or environmentally undesirable levels of wildfire, pests, diseases, invasive species and other damaging agents and thus maintain and improve long-term forest health and productivity.

3. **Protection of Water Resources:** To protect water bodies and riparian areas, and to conform with forestry best management practices to protect water quality, to meet the needs of both human communities and ecological systems.

4. **Protection of Biological Diversity:** To manage forests in ways that protect and promote biological diversity, including animal and plant species, wildlife habitats, ecologically important species and native forest cover types.

5. **Aesthetics and Recreation:** To manage the visual impacts of forest operations, and to provide recreational opportunities for the public.

6. **Protection of Special Sites:** To manage lands that are ecologically important, geologically or culturally important in a manner that takes into account their unique qualities.

7. **Responsible Fiber Sourcing in North America:** To use and promote among other forest landowners sustainable forestry that is both scientifically credible and economically, environmentally and socially responsible.

8. **Legal Compliance:** To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.

9. **Research:** To support advances in sustainable forest management through forestry research, science and technology.

10. **Training and Education:** To improve the practice of sustainable forestry through training and education programs.

11. **Community Involvement and Social Responsibility:** To broaden the practice of sustainable forestry on all lands through community involvement, socially responsible practices, and through recognition and respect of Indigenous Peoples' rights and traditional forest-related knowledge.

12. **Transparency:** To broaden the understanding of forest certification to the Forest Management Standard by documenting certification audits and making the findings publicly available.

13. **Continual Improvement:** To continually improve the practice of forest management, and to monitor, measure and report performance in achieving the commitment to sustainable forestry.

1. General Information

1.1 Name, Contact, and Certificate Information

Organization Name	State of Wisconsin: Wisconsin Department of Natural Resources – State Forests and Lands
Certification Representative	Teague Prichard
Phone Number	608-669-8290
Address	101 S. Webster St. FR/4 PO Box 7921 Madison, WI 53707-7921
Audit Dates	11-15 September 2023
SFI Certificate Type	☐ Single ☒ Multi-site. This Audit covered the requirements of the central organization and a subset of sites. These sites were selected based on proximity and length of time since previous audits. See Summary of Audit Itinerary for details of sampling.

2. Summary Description of the Management Unit(s)

Description of Ownership	☒ SFI: List of all sites/FMUs under scope of the certificate, including certified acres. Copy of DNR_STATE_LANDS_
Total Forest Area (Acres)	1543366
Description of Sites and Group Membership under Scope	☐ Single site description ☒ SFI: List of all sites/FMUs under scope of the certificate, including certified acres. ☐ ATFS: Summary of Sites/FMUs under scope of certificate, including acres. ☐ Group: Description of group structure.
Management Unit Maps	Provide a link to any public maps.
Forest Types and Key Ecological Features	General description of major timber types with a general characterization of management approaches used (natural regeneration vs. planting, thinning regimes, even-aged vs. uneven-aged silvicultural). The department has embarked on a regional planning approach based on Ecological Landscapes. Ecological Landscapes (ELs) are regions of the state that are distinguished by unique ecological characteristics and management opportunities. These regions were delineated using a land classification system developed by the U.S. Forest Service in cooperation with other federal and state partners. A regional master plan for each of the 16 ELs in Wisconsin will include all department properties within that landscape. Properties are usually assigned to the EL within which most of their acreage resides. https://dnr.wisconsin.gov/topic/fl/PropertyPlanning/About
Forest Management Planning	The management plan outlining forest management policies and objectives: See Property Planning | Facilities and Lands | Wisconsin DNR

Sustainable Harvest Level Assessment	Public Summary of how long-term harvest levels are determined, maintained, and monitored. *Note: Details supporting this description are provided with evidence under Performance Measure 1.1, when evaluated.*
Monitoring Program Description	See https://dnr.wisconsin.gov/topic/forestmanagement/regenmonitoring, https://dnr.wisconsin.gov/topic/ForestHealth, and https://dnr.wisconsin.gov/topic/forestmanagement/bmp for examples.

3. Audit Process

3.1 Applicable Standards and Audit Objectives

Certificate Code	SCS-SFI/FM-000070
Audit Type	☐ Stage 1, Preliminary Review Audit ☐ Stage 2, Certification Audit ☒ Re-Certification ☐ COVID-19 Additional Surveillance ☐ 1st, ☐ 2nd, ☐ 3rd or ☐ 4th Surveillance ☐ Transfer ☐ Expansion of Scope ☐ Other (*describe*):
Applicable Standards	☒ SFI: 2022 Forest Management. *Objectives 1-17. Exclusions, if applicable:* ☒ SFI: Rules for Use of SFI On-Product Labels and Off-Product Marks ☒ SFI: Audits of Multi-Sites
Multiple Standards	☐ N/A, this is not a multi-standard nor a multi-CB audit. This was a dual combined audit including FSC® US Forest management.

☒ Combined	☐ Joint	☐ Integrated
A combined audit is when a client is being audited against the requirements of two or more	*A joint audit is when two or more auditing organizations cooperate to audit a single client.*	*An integrated audit is when a client has integrated the application of requirements of two or more management systems standards into a single management system and is being audited against more than one standard.*

SFI Substitute or Modified Indicators	☒ None, ☐ Yes, Substitute or Modified Indicators used and justification:
Certificate Scope/ Statement	The scope of the certificate includes all forest management activities associated with the Organization's sustainable forest management system with defined forest lands located in Wisconsin and including the harvest unit and associated landing site(s), and other forest management system activities for the Audit Objectives. The Organization has sufficient control over any contracting or outsourcing of forest management planning and activities to ensure conformance to applicable certification requirements. These forest management activities occur on approximately 1.5 million acres of Wisconsin state forest, park, and wildlife lands.
Description of Sampling Approach	Categories included in the DNR Lands forest certification review include: • Northern and Southern State Forests • State Parks • State Recreation Trails • State Wildlife Areas (including leased federal lands, Meadow Valley W.A.) • State Fisheries Areas

	• State Natural Areas • Natural Resource Protection and Management Areas • Lower Wisconsin Riverway • State Wild Rivers • State Owned Islands • Stewardship Demonstration Forests The following DNR properties (about 37,798 acres) are excluded from the certification project: • Agricultural fields (due to potential GMO issue) • Stream Bank Protection Areas (eased lands not under DNR management) • Forest Legacy Easements (eased lands not under DNR management) • States Fish Hatcheries and Rearing Ponds (intensive non-forest use) • State Forest Nurseries (intensive non-forest use) • Nonpoint Pollution Control Easements (eased lands not under DNR management) • Poynette Game Farm and McKenzie Environmental Center (intensive non-forest use) • Boat Access Sites (intensive non-forest use) • Fire Tower Sites (intensive non-forest use) • Radio Tower Sites (intensive non-forest use) • Ranger Stations (intensive non-forest use) • Administrative Offices and Storage Buildings (intensive non-forest use) • State Park Intensively Developed Recreation Areas (intensive non-forest use) e.g. Peninsula State Park golf course, Blue Mound State Park swimming pool • State Trails Cooperatively Managed by Others (planning and management authority given to others by MOU; primarily counties). In 2023, state lands in the Northwest region were sampled, including Brule River State Forest, Flambeau River State Forest, Governor Knowles State Forest, Hay Creek-Hoffman Wildlife Area, Crex Meadows Wildlife Area, Gandy Dancer State Trail, Kimberley Clark Wildlife Area, McKenzie Creek Wildlife Area, Pattison State Park, Rice Beds Creek Wildlife Area, White River Fishery Area, and Wild Rivers State Trail.
Deviations from the Audit Plan	Were there any significant deviations from the Audit Plan? ☒ No ☐ Yes. If yes, provide a description and explanation.

3.2 Audit Team

Auditor name:	Beth Jacqmain	Auditor role:	Lead Auditor
Qualifications:	Beth is a qualified Forest Management/Chain of Custody Lead Auditor to ATFS, SFI, RW, and FSC. Beth is Principal and Owner of American Nature Solutions forest certification, forest management and nature-based solutions consultancy. Involved in forest certification management and systems since 2010. Beth has over 18 years' experience as a forest management practitioner including private consulting, public land management, and private corporate forest management working with landowners and harvest crews. She is a member of the Forest Guild, Society of American Foresters, Society for Conservation Biology, and Ecological Society of America. SAF Certified Forester #1467, MS Forest Biology/Ecology, Auburn University, BS Michigan State University. Qualified ANSI RAB accredited ISO 14001 EMS Lead, ISO 19011, and 17021 QMS.		
Auditor name:	Daniel Martin	Auditor role:	Team Auditor
Qualifications:	Daniel Martin is a consultant offering specialized services in sustainable forest management, chain of custody and environmental management systems supporting a number of clients throughout Canada and the US. Daniel is a Registered Professional		

	Forester in the Province of New Brunswick (#646) and a Forest Engineer in the Province of Quebec (11-014) as well as a Lead Auditor. He has conducted well over 200 audits in the fields of sustainable forest management, chain of custody and in environmental management systems. Daniel has worked in the Maritimes, Great Lakes/Saint-Lawrence, and Boreal regions in Canada as well as in Northern Brazil. Daniel has experience in the forest industry as a supervisor and manager, specifically in silviculture, harvesting and fiber procurement for sawmills in New Brunswick and Nova Scotia. Furthermore, he has cumulated experience in the management of an engineered wood products facility in the province of Quebec and have been a lecturer at the Université de Moncton in forest operations and forest certification. These experiences have allowed the development of skills ranging from forest management, health and safety, budgeting, contract negotiations and human resource management. He has participated in the negotiation of collective bargaining agreements in the context of forest operations as well as of a production plant.

Auditor name:	Kyle Meister	Auditor role:	Team Auditor
Qualifications:	Kyle Meister is an SFI, PEFC & FSC Forest Management (FM) and Chain of Custody (COC), and Sustainable Biomass Partnership Lead Auditor with SCS Global Services. He has conducted evaluations or surveillance audits in Bolivia, Brazil, Canada, Costa Rica, Dominican Republic, Indonesia, India, Japan, Mexico, New Zealand, Spain, and all major forest producing regions of the United States. He has conducted COC assessments in Bolivia, Brazil, Canada, Panama, and the United States. Mr. Meister has successfully completed CAR Lead Verifier, ISO 9001:2008 Lead Auditor, SA8000 Social Systems Introduction and Basic Auditor, RSPO Supply Chain Lead Auditor, SBP Lead Auditor, and FSC Lead Auditor and Trainer Training Courses. He holds a B.S. in Natural Resource Ecology and Management and a B.A. in Spanish from the University of Michigan; and a Master of Forestry from the Yale School of Forestry and Environmental Studies.		

3.3 Total Time Spent on Audit

A. Number of days spent on-site for the Audit	5
B. Number of auditors participating in on-site audit	3
C. Number of days spent by any technical experts (in addition to amount in line A)	0
D. Additional days spent on preparation, stakeholder consultation, and follow-up	3
E. Total number of person days used in audit	**11**

3.4 Summary of Audit Itinerary and Site Visits

Location(s) sampled	Northwest Forestry District, including Brule River, Flambeau River and Governor Knowles State Forests, State Wildlife Areas, Flowages, Parks, and Other State Lands.
Number of field sites	85
Summary of Cover Types visited	White-red-jack pine, Aspen-birch, Spruce-fir, and Maple-beech-birch (and other Northern hardwood mixes).
Summary Description /Number of Silviculture Activities inspected	Final harvest of aspen-birch and white-red-jack pine, thinning of white-red-jack pine, even- and uneven-aged management of northern hardwood types. Wildlife management activities such as prescribed fire, mowing, and slashing.
Summary Description of Road infrastructure inspections	Road grading, upgraded stream crossings and stream crossing maintenance, installation of waterbars and broad-based dips, new road construction, and rocked fords.

3.5 Evaluation of Management Systems

SCS deploys teams with expertise in forestry and other relevant fields to assess the certified organization's conformance to SFI standards and policies. Audit methods include reviewing documents and records, interviewing personnel and contractors, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observing implementation of management plans and policies in the field, and collecting and analyzing relevant stakeholder input. When there is more than one team member, each member may review parts of the standards based on their background and expertise. Applicable aspects of the Management System under evaluation, such as Management System Review and other relevant Objectives, Performance Measures, and Indicators will also inform the audit team. On the final day of an evaluation, team members convene to deliberate the findings of the audit jointly. This involves an analysis of all relevant field observations, interviews, reviewed documents and records, and relevant stakeholder input. Where consensus among team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

3.6. Changes to Management System

☒ There were no significant changes in the management and/or harvesting methods that affect the FME's conformance to the SFI standards, rules, and policies.

☐ Significant changes that affect the management system occurred since the last audit described as follows (describe):

3.7 Confirmation of Meeting Audit Objectives

The objectives for this audit included:

a. Determination of the conformity of the client's management system, or parts of it, with audit criteria (Selected Objectives, Performance Measures, and/or Indicators).
b. Determination of the ability of the management system to ensure the client meets applicable statutory, regulatory and contractual requirements.
c. Determination of the effectiveness of the management system to ensure the client can reasonably expect to achieve specified objectives.
d. As applicable, identification of areas for potential improvement of the management system.

Audit Objectives were met	**Yes** ☒ **No** ☐ If no, provide an explanation:

4. Results of Audit

4.1 Grading of Possible Findings

Once a consensus is reached by the audit team, determinations of grading are made as to the level of findings. Grading of findings may occur as follows:

- ▪ *Major CARs*: Major Corrective Action Requests (CARs) occur when one or more of the SFI 2022 Standard(s) performance measures or indicators has not been addressed or has not been implemented to the extent that a systematic failure of a Certified Organization's SFI system to meet an SFI objective, performance measure or indicator occurs.
- ▪ *Minor CARs:* An isolated lapse in SFI 2022 Standard(s) implementation which does not indicate a systematic failure to consistently meet an SFI objective, performance measure or indicator.
- ▪ *Opportunities for Improvement:* Opportunities for Improvement (OFIs) are identified by audit team members where the client is in conformance, but there is a risk to conformance in the future. Nonconformance with the standard requirements cannot be recorded as OFIs.
- ▪ *Exceeds:* Practices that exceed the basic requirements of the SFI 2022 Standards and Rules for Forest Management or Fiber Sourcing.

4.2 Table of Audit Results and History of Findings for Certificate Period

This table lists Findings to the Performance Measure and/or Indicator level for each year of the certificate period and is updated annually.

SFI Objective	Cert/Re-cert Evaluation (2023)	1st Annual Evaluation (2024)	2nd Annual Evaluation (2025)	3rd Annual Evaluation (2026)	4th Annual Evaluation (2027)
No findings	☐	☐	☐	☐	☐
1					
2	OFI 2.2.8				
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13	OFI 13.1.2				
14					
15					
16					
17					
COC					
Trademark					
Group					
Other					

4.3 General Description of Evidence of Conformity

This section summarizes the general evidence found to verify conformity that is detailed in Appendix 5.

SFI Objective	Summary of Evidence
Objective 1. Forest Management Planning. To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion or afforestation of ecologically important areas.	Wisconsin DNR maintains a detailed complex management and GIS system for managing State Lands. Management Plans and Interim Management Plans are utilized based on Wisconsin ecological landscapes. Forest inventory is maintained and utilized for guidance on sustainable harvest levels. Personnel are trained, knowledgeable and experienced to develop and implement forest management activities. Review of all field sites in 2023 confirmed accurate maps and ground conditions represented within prescriptions and harvest plans. No conversions to non-forest use was observed.
Objective 2. Forest Health and Productivity. To ensure long-term forest productivity and conservation of forest resources through prompt reforestation, afforestation, deploying integrated pest management strategies, minimized chemical use, soil conservation, and protecting forests from damaging agents.	WisFIRS System is maintained for foresters to schedule reforestation which issues alerts so that sites are promptly reforested. Regional ecological impacts of reforestation or afforestation are discussed as part of the master planning or Interim Forest Management Plan (IFMP) process. Ecological plans for reforestation are bounded by the master plans, or in the Interim Forest Management Plan if a master plan is not in place; reforestation projects are discussed at annual integrated property meetings to assure that proposed reforestation meets property objectives.
Objective 3. Protection and Maintenance of Water Resources. To protect the water quality and water quantity of rivers, streams, lakes, wetlands, and other water bodies.	Review of seventy-seven (77) field sites confirmed Protection and Maintenance of Water Resources. Qualified personnel and harvest contractors were confirmed during implementation of forest management activities. No BMP issues were observed and Riparian Management Zones were protected and observed during field site audit of all sites.
Objective 4. Conservation of Biological Diversity To maintain or advance the conservation of biological diversity at the stand- and landscape- level and across a diversity of forest and vegetation cover types and successional stages including the conservation of forest plants and animals, aquatic species, threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests and ecologically important sites.	Invasive Species management was reviewed for all field sites during 2023 audit. Wisconsin DNR has a very active program to address specific invasive species with qualified and trained personnel. One opportunity for improvement was noted to help strengthen the program.
Objective 5. Management of Visual Quality and Recreational Benefits. To manage the visual impact of forest operations and provide recreational opportunities for the public.	As the entire FMP and associated documents are available to the public the general FMP, master plans, and interim management plans meet this requirement. Aesthetics is covered in Chapters 4

	and 18 of the general FMP. Part d of the site-level plan (form 2460) covers aesthetics. Visual aspects may also be covered in the Requirements and Additional Requirements of the timber sale prospectus. Inspection of harvest sites sampled confirms implementation of aesthetic components.
Objective 6. Protection of Special Sites. To manage lands that are geologically or culturally important in a manner that takes into account their unique qualities.	Interviews with Wisconsin DNR personnel confirmed use of non-public resources to identify and protect sites of archaeological/cultural/historic importance on state lands. Interviews with DNR Archaeologist and DNR forestry personnel confirmed the process prior to forest management activities.
Objective 7. Efficient Use of Fiber Resources. To minimize waste and ensure the efficient use of fiber resources.	Utilization standards are specified in contracts, and utilization is documented during timber sale administration. Observations of completed and ongoing timber harvests showed that in most cases cut trees are used to a 3- or 4-inch tip diameter. Timber sale contract clauses cover site-specific utilization standards and/or biomass harvesting.
Objective 8. Recognize and Respect Indigenous Peoples' Rights. To recognize and respect Indigenous Peoples'' rights and traditional knowledge.	Specification of adherence to UNDRIP is included in part V of the DNR Policy Regarding Consulting with American Indian Tribal Nations in Wisconsin (December 2021). Review of staff training records includes courses such as Introduction to Federal Indian Law and Cultural Sensitivity Training for Ojibwe Communities. Executive Order 18 also affirms the state's commitment to affirmatively consulting and working with tribes.
Objective 9: Climate Smart Forestry To ensure forest management activities address climate change adaptation and mitigation measures.	WI DNR is a member of the SIC. DNR is also involved in the Climate alliance project, Adaptive Silviculture Study-ASCC, Assisted Migration (DREAM) study, Priority landscape in Forest action plan (resiliency, based on risk), Governor's Task Force on Climate Change report, WDNR Forestry climate change team, and WDNR forestry Climate Change webpage.
Objective 10. Fire Resilience and Awareness To limit susceptibility of forests to undesirable impacts of wildfire and to raise community awareness of fire benefits, risks, and minimization measures.	DNR has a program across Bureaus to manage a full-service fire prevention program including wildfire equipment and trained personnel. It also works with local fire departments as cooperators. Some harvests are targeted at ecological restoration (e.g. barrens, savannas, and grasslands). These areas are aligned with property plans, wildlife management and landscape ecological restoration or maintenance goals and are included in the department's certificates.

Objective 11. Legal and Regulatory Compliance To comply with all applicable laws and regulations including, international, federal, provincial, state, and local.	Wisconsin DNR maintains a public website for policies and procedures to meet regulatory requirements. Auditor reviews during randomly selected field sites confirmed access to regulatory postings was publicly available and no adverse, hazardous or regulatory issues were observed.
Objective 12. Forestry Research, Science and Technology. To invest in research, science, and technology, upon which sustainable forest management decisions are based.	DNR funds research (internal and external) on a broad range of issues: forest health, chemical efficiency, water quality, wildlife management, conservation, social issues, energy efficiency, forest operations, etc. The Department develops a forestry research agenda with the Wisconsin Council on Forestry and partners. Confirmed by review of the Division of Forestry – FY18 Annual Review Service Support Functions (SSF) – DRAFT.
Objective 13. Training and Education. To improve the implementation of sustainable forestry through appropriate training and education programs.	SFI commitment is in the Public Forest Lands Handbook CN 320/10. Contracts require use of qualified/trained personnel. An ICIT team composed of members of both Forestry and Lands Divisions, with representatives of all of the bureaus involved, helps ensure that roles are understood. Training records indicated that employees obtain varied training, ranging from agency-provided meetings up to major conferences and even college-level courses. Interviews with professional staff showed most had 4-year degrees and many have advanced degrees in relevant natural resources fields.
Objective 14. Community Involvement and Landowner Outreach. To broaden the practice of sustainable forestry through public outreach, education, and involvement, and to support the efforts of SFI Implementation Committees.	DNR has an extensive program of outreach and landowner education, as confirmed by reviewing the various web pages that provide information and which promote workshops, conferences, etc. Field offices have extensive educational materials available to the public and provide land management assistance at no charge. DNR has regular public outreach efforts including local venues, service clubs, publications, news articles, features, the Natural Resources Magazine.
Objective 15. Public Land Management Responsibilities. To participate and implement sustainable forest management on public lands.	Public input opportunities during Master Plan development are very detailed including: Local stakeholder outreach, community outreach, annual stakeholder meetings, listening sessions, newsletters, integrated property management meetings; outreach is scaled to the public's level of interest and relative risk. Public input opportunities are solicited on DNR website.

Objective 16. Communications and Public Reporting To increase transparency and to annually report progress on conformance with the SFI Forest Management Standard.	Public Reports are available on Wisconsin DNR website but not listed on SFI website as required
Objective 17. Management Review and Continual Improvement: To promote continual improvement in the practice of sustainable forestry by conducting a management review and monitoring performance.	Records of program reviews, agendas and notes from management review meetings confirmed detailed process for review. Review of internal and external audits confirmed compliance.

4.4 Existing Corrective Action Requests, OFIs, and Exceeds

OFI 2022.1: There is an opportunity for more coordinated collaboration on invasive species management that may benefit forestry, wildlife, and fisheries objectives on the FMU.

Organization's response: WDNR RESPONSE
After conducting an internal review and seeking clarification on the administrative code eligibility and requirements, we have taken the following actions in response to OFI:
Use of Forest Regeneration Funds associated with a timber sale: DNR reviewed the Wisconsin Administrative code provisions related to the use of timber sale proceeds for controlling invasive species in the context of forest regeneration. It has been confirmed that the regeneration fund can indeed be utilized for treatments outside of the harvest boundary, provided it is deemed necessary to support successful forest regeneration.
Communication and Outreach: DNR State Forest Specialist and ICIT proactively reached out to Area Forest Staff Specialists and foresters who provide technical guidance and implement forest regeneration projects. Through these discussions, DNR has ensured that our staff is aware of the option to use regeneration funds for invasive species control measures outside and adjacent to harvest boundaries when such treatments are essential for successful forest regeneration.
Risk Assessment and Decision-Making: Our foresters have informed us that they use a stand-based risk assessment approach to determine the extent and location of invasive species within the area. This assessment includes considering the potential impact of invasive species on forest regeneration through species type, spread and seed distribution potential.
Updating Forest Regeneration intranet page : In response to your findings, we are taking steps to update our Forest Regeneration website and implementation guidelines. The revisions will provide clearer guidance on the eligibility of using regeneration funds for treating invasive species outside but adjacent to harvest boundaries. Additionally, we will highlight the potential ecological benefits and operational efficiencies of conducting these treatments concurrently with timber harvest activities.
Through this OFI and follow-up actions, we are committed to fostering greater coordination and collaboration among our forestry, wildlife, and fisheries teams to enhance our invasive species management strategies. By doing so, we believe we can better align our efforts to achieve our shared objectives of preserving native species and maintaining the ecological integrity of our forest management units while ensuring adequate reforestation in harvested stands.

SCS Review: Reviewed the ICIT and Forest Leadership meeting minute notes from August 2023 to confirm that the team had two meetings to discuss preparation for upcoming audit. Per interviews with multiple staff participants, this included discussions on open findings. Field observation on two buckthorn treatment sites during the audit indicated two approaches used. One was an experimental use of goats to control buckthorn. The other unit used basal bark application within a planned harvest unit. Review of the application map indicates that the staff applicators also treated areas adjacent to the

timber sale unit since there was leftover herbicide. The staff at this unit also maintains GIS maps on their phones of invasive species locations detected while doing other work. This allows them to prioritize the use of leftover herbicide. The two approaches were done independent of the staff working on responding to the OFI. No sites inspected this year or last had invasive species interfering with the establishment or release of desired regeneration. Per interviews with field staff and managers, updating recommended practices for invasive species treatment is a multi-year process, involving literature review and consultation with internal stakeholders at multiple levels. The use of herbicides outside of harvest units depends largely on funds available. Within harvest units, timber sale proceeds can be used with no funding restrictions. The two approaches observed represented 1) non-chemical options to explore; and 2) ways to use leftover herbicides since a minimum amount must be prepared per tank. **This OFI is closed**.

4.5 New Corrective Action Requests, OFIs, and Exceeds

Finding Number: 2023.1	
Finding and Deadline	☐ Major: Pre-condition to certification ☐ Major: 3 months from Closing Meeting ☐ Minor: Next audit (surveillance or re-evaluation) or 12 months from closing ☒ OFI: no deadline ☐ Exceeds: no deadline ☐ Other deadline (specify):
SFI Indicator:	SFI 2.2.8, part i. Use of management practices appropriate to the situation, such as: a. notification of adjoining landowners or nearby residents concerning applications and chemicals used; b. appropriate multilingual signs or oral warnings; c. control of public road access during and immediately after applications; d. designation of streamside and other needed buffer strips; e. use of positive shutoff and minimal-drift spray valves; f. aerial application of forest chemicals parallel to buffer zones to limit drift; g. monitoring of water quality or safeguards to ensure proper equipment use and *protection* of streams, lakes, and other water bodies; h. appropriate transportation and storage of chemicals; **i. use of spill response plans and chemical spill kits;** j. filing of required state or provincial reports; and/or k. use of methods to ensure *protection* of *threatened and endangered* species.
☐ **Non-Conformity** ☒ **Background/ Justification in the case of OFI or Exceeds**	
No harvest sites visited were active during the audit. The state requirement is to maintain an accessible spill containment and clean-up kit appropriate for the material on the operation. There was no evidence of violations of this requirement during onsite inspection of idle equipment; no spills or persistent leaks on equipment were observed. It was not possible to inspect inside the cab or in compartments to verify if spill kits were available on harvest equipment. It is also possible that operators could keep spill kits in trailers or transport vehicles onsite. Given that spill kits must be accessible, and not necessarily located on harvest equipment, there is an opportunity to review best practices for back-up options, such as recommending that oil absorbent sheets be available on harvest equipment.	
Action Plan and Root Cause	No action plan is required for an OFI.

Analysis *(to be prepared by Organization)*		
SCS Review of Action Plan	☐ Accepted	☐ Rejected (*explain*):
	SCS representative:	Date:
Evidence and Actions Implemented by Organization		
SCS Review of Implemented Actions		
Status of Finding:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*	

Finding Number: 2023.2	
Finding and Deadline	☐ Major: Pre-condition to certification ☐ Major: 3 months from Closing Meeting ☐ Minor: Next audit (surveillance or re-evaluation) or 12 months from closing ☒ OFI: no deadline ☐ Exceeds: no deadline ☐ Other deadline (specify):
SFI Indicator:	SFI 13.1.2. Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer continuing education training courses that shall be taken by qualified logging professionals at least once every two years to maintain their status. The continuing education training course(s) shall address one or more of the following topics: i. logging safety;

☐ **Non-Conformity**   ☒ **Background/ Justification in the case of OFI or Exceeds**

There were no active operations during the site visit. Staff described health and safety requirements for heavy equipment operators, which include having processes and procedures to ensure health and safety of all forest workers. In these interviews and per observation of idle equipment onsite, the audit team concluded that the certificate holder has the opportunity to review lockout-tagout procedures or training for relevant logging equipment considering the level of risk and restrictions due to contractor relationships.

Action Plan and Root Cause Analysis *(to be prepared by Organization)*		
SCS Review of Action Plan	☐ Accepted	☐ Rejected (*explain*):
	SCS representative:	Date:
Evidence and Actions Implemented by		

Organization	
SCS Review of Implemented Actions	
Status of Finding:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

5. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Sustainable Forestry Initiative standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the Certified Organization's response to any open CARs.	**Yes** ☒ **No** ☐
Comments: None	