

FOREST MANAGEMENT AND STUMP-TO-FOREST GATE CHAIN-OF-CUSTODY SURVEILLANCE EVALUATION REPORT

*Wisconsin Department of Natural Resources
Managed Forest Law Tree Farm Group*

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CERTIFIED	EXPIRATION
02/Dec/2013	01/Dec/2018

DATE OF FIELD AUDIT
12-16 June 2017
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Foreword

Cycle in annual surveillance audits				
<input type="checkbox"/> 1 st annual audit	<input type="checkbox"/> 2 nd annual audit	<input type="checkbox"/> 3 rd annual audit	<input checked="" type="checkbox"/> 4 th annual audit	<input type="checkbox"/> Other (<i>expansion of scope, Major CAR audit, special audit, etc.</i>):
Name of Forest Management Enterprise (FME) and abbreviation used in this report:				
Wisconsin Department of Natural Resources (WIDNR), Managed Forest Law Program (WIMFL)				

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing conformance with the requirements and standards of certification. A public summary of the initial evaluation is available on the FSC Certificate Database <http://info.fsc.org/>.

Pursuant to FSC and SCS guidelines, annual / surveillance audits are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope audit would be prohibitive and it is not mandated by FSC audit protocols. Rather, annual audits are comprised of three main components:

- A focused assessment of the status of any outstanding conditions or Corrective Action Requests (CARs; see discussion in section 4.0 for those CARs and their disposition as a result of this annual audit);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this audit; and
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the audit.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (<http://info.fsc.org/>) no less than 90 days after completion of the on-site audit. Section B contains more detailed results and information for the use by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Annual Audit Team

Auditor Name:	Beth Jacqmain	Auditor role:	FSC Lead Auditor, ATFS Team Auditor
Qualifications:	<p>Beth Jacqmain is a Certification Forester with SCS Global Services. Jacqmain has MS Forest Biology from Auburn University and a BS Forest Management from Michigan State University. Jacqmain is Society of American Foresters (SAF) Certified Forester (#1467) with 20+ years’ experience in the forestry field including private corporate, private consulting, and public land management. Jacqmain is a qualified ANSI RAB accredited ISO 14001 EMS Lead Auditor and is a qualified FSC Lead Auditor for Forest Management/Chain of Custody. Jacqmain has audited and led FSC certification and precertification evaluations, harvest and logging operations evaluations, and has participated in joint SFI and American Tree Farm certifications. Jacqmain is a 9 year member of the Forest Guild and 20 year adjunct-Faculty with Itasca Community College, Natural Resources Department. Jacqmain’s experience is in forest management and ecology; the use of silviculture towards meeting strategic and tactical goals; forest timber quality improvement, conifer thinning operations, pine restoration, and fire ecology in conifer dominated systems.</p>		
Auditor Name:	Norman Boatwright	Auditor role:	ATFS Lead Auditor; FSC Team Auditor
Qualifications:	<p>Norman Boatwright is the president of Boatwright Consulting Services, LLC located in Florence, South Carolina. BCS handles typical forestry consulting, SFI, ATF and FSC Audits, Phase I Environmental Site Assessments, Forest Soil Mapping, Wetland Delineation, and other Biological Services. Norman has over twenty-nine years’ experience in intensive forest management, eighteen years’ experience in environmental services and ten years’ experience in forest certification auditing. He has conducted Phase I Assessments on over three hundred and fifty projects covering 3,000,000 acres, Endangered Species Assessments on timberland across the South, and managed soil mapping projects on over 1.3 million acres. From 1985-1991, he was Division Manager at Canal Forest Resources, Inc. and was responsible for all forest management activities on about 90,000 acres of timberland in eastern South Carolina. Duties included budgeting and implementing land and timber sales, site preparation, planting, best management practices, road construction, etc. From 1991-1999, he was manager of Canal Environmental Services which offered the following services: Phase I Environmental Site Assessments, Wetland Delineation and Permitting and Endangered Species Surveys. From 1999-2012 he was the Environmental Services Manager, Milliken Forestry Company. Norman has extensive experience auditing SFI, procurement and land management organizations and American Tree Farm Group Certification Programs. He is also a Lead Auditor for Chain of Custody Audits under SFI, PEFC, and FSC</p>		
Auditor Name:	Michelle Matteo	Auditor role:	FSC/ATFS Team Auditor
Qualifications:	<p>Michelle Matteo is a Forest Management Senior Lead Auditor with experience conducting audits for large and small private and public landowners. Michelle also conducts Lead Auditor Chain of Custody audits under the SFI, FSC, and PEFC</p>		

	Standards with experience conducting hundreds of COC audits for a broad range of manufacturers and distributors. She is also a Qualified Lead Auditor for SFI 2015-2019 Standard audits for procurement and land management. Michelle is a forester, biologist, and arborist and maintains a (state) Massachusetts Forester License as well as an International Society of Arboriculture (ISA) Certification, and is a current member of the Society of American Foresters. She has a background in urban and traditional forestry, wildlife biology, and watershed science, and has experience with both state and federal environmental regulations. Michelle earned her MS in Forestry and BS in Wildlife & Fisheries Biology from the University of Massachusetts in Amherst.
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1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	5
B. Number of auditors participating in on-site evaluation:	3
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	3
D. Total number of person days used in evaluation:	18

1.3 Standards Employed

1.3.1. Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC-US Forest Management Standard	V1-0	8 July 8 2010
FSC standard for group entities in forest management groups (FSC-STD-30-005)	V1-0	31 August 2009
All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Standards page (www.scsglobalservices.com/certification-standards-and-program-documents). Standards are also available, upon request, from SCS Global Services (www.SCSGlobalServices.com).		

2 Annual Audit Dates and Activities

2.1 Annual Audit Itinerary and Activities

12 June 17, Monday	
FMU/Location/ sites visited	Activities/ notes
8 AM – 9 AM Dodgeville SC 1500 N Johns St, Dodgeville, WI	Opening Meeting: Introductions, client update, review audit scope, audit plan, intro/update to FSC and SCS standards and protocols, review of open CARs/OBS, final site selection or adjustments.
Dodgeville SC - Boatwright	
Grunow Order # 25-049-2002	63 acre high value crop tree removal of 4 marked and numbered high value walnut trees. Hand cut and skidded out to a deck in a food plot. Sugar maple is present in large numbers in the understory. Sale area included Parkers Creek, a Class 1 trout stream. Management plan followed and no issues observed.
Lipska	14 acre even aged stand overstory removal with take trees marked; with

Order # 25-064-2000	some storm salvage. Mature walnut removal and mature oak thinning. Mandatory practices followed and no issues observed.
Watkins Order #25-027-2005	80 acre marked timber stand improvement cut with removal mature sawtimber (red & white oak) and other high risk or poor quality species; included small gap cuts. Good stocking and little damage to residuals. Intermittent stream to the SE wasn't crossed. Post-sale DNR harvest inspection indicated minor rutting along main skid trail. Logger repaired when dry. Management plan followed and no issues observed.
Shelton Order #25-017-1995	80 acre area. 3 patch final harvests established to release and establish oak regen totaling around 11 acres. Harvest boundaries clearly marked with blue paint. Small hydraulic leak (3'x5'x1") identified under forwarder. Management plan followed and no issues observed.
Amborn Order #25-064-2004	74 acre sale area with small aspen final harvests. Management plan followed and no issues observed.
Richland Center - Jacqmain	
Wilkinson property: 53-029-2013	Overstory removal done in a combination of patch cuts and group selection, 55 acres, natural regeneration. Cut completed 2015. Visited site to review current timber stand improvements (TSI) by landowner to complete steps outline by DNR forester in post-harvest inspection in order to meet silviculture objectives in management plan. Forester had marked stems for removal to complete silviculture practice. Discussions: FMPs, WIDNR roles, Cutting Notice Registration.
Knauf property: 53-009-2015	Completed timber sale winter done 2015, 52 acres. Non-commercial TSI work prescribed. Even-aged patch selection harvest to promote natural regeneration of shade tolerant species. No issues. Discussions: BMPs, RMZ
Demers property: 53-024-1996	Completed timber sale done winter 2016. Logger select harvest (with DNR forester advisement and help in prescription development). WIDNR review resulted in required additional practice letter to clean gaps of mid-story, noncommercial. Discussions: regeneration, TSI, enforcement
Rolling Family Farm: 53-008-1997	Completed group selection harvest. Consulting forester set up sale for two stands by delineating 5 cutting areas for salvage, thinning, aspen removal, seed tree removal of undesirable species, overstory removal for advanced oak regeneration; group selection gaps for regeneration with objective of shifting stand age/size structure towards unevenaged management.
Charles Ray – 53-003-2007	Completed harvest, 18 acres. Interview with landowner. Even-aged overstory removal to release advanced regeneration of natural oak, hickory, and maple. Invasives treatment included in prescription and carried out by landowner. Logging cutting notice includes requirements for cleaning equipment prior- and post-logging to avoid invasive seed transfer. Landowner has done additional mid-story stem removals (ironwood, prickly ash) over 84 acres of property.
Spring Green – Matteo	

<p>Wipperfurth property: 57-012-2012</p>	<p>Shelterwood Harvest – preparatory cut, Overstory Removal, Thinning, on 117 ac. Active, but shut down for oak wilt restriction. Multiple prescriptions within the stands. Parts of Stand 2 marked for harvest, not the whole stand. Attempted to schedule during winter/spring 2017 but weather conditions were too warm.</p> <p>Small amount of erosion on main road, will water bar the main road after the harvest is done. Additional cost-share dollars needed post-harvest to complete prescription and remove/girdle small stems and control ironwood that remain. Invasives noted in management plan and Cutting Notice (CN) to harvest garlic mustard at end of logging operation to reduce spread.</p>
<p>Moseman property: 57-005-2014</p>	<p>Group selection, patch selection harvest, aspen regeneration cuts, thinning, on 160 ac. DNR filled in cutting notice and installed group and patch delineation after marking was completed by logging contractor. Landowner walked site with group & has planted 75- 3’ tall whips of black walnut, hard maple, and hickory in clearcut areas, spruce trees planted adjacent to harvest unit. Wildlife trees noted in CN, marked and retained throughout stands. Barberry removal to be conducted; landowner is active in his woods and will control barberry and other noted invasives, post-harvest. Thinned stands shows aspen, oak, & ash regeneration, some deer browse issues on tops of regen.</p>
<p>Statz property: 57-043-2012</p>	<p>Patch Selection Harvest, Shelterwood Harvest – preparatory cut, Overstory Removal, on 19 ac. Cut not yet completed, one stand marked, not yet cut.</p> <p>Notes in WisFRS - Phone conversation with landowner Duane Statz 9/22/15 3:50 PM regarding regeneration challenges with competing vegetation and deer browse as noted on the CN. Landowner understood that follow-up after the harvest would likely need to be continued. Aquatic NHI hits, but all outside harvest area. Rich site with diverse herbaceous species. CN references the Invasives BMPs to be followed.</p>
<p>Froese property: 57-028-2013</p>	<p>Patch Selection Harvest, Aspen regeneration cuts, Thinning, on 55 ac. Aspen Clear Cut (CC) retained some oak for mast for wildlife. Wildlife trees noted in CN, marked and retained throughout stands. Small amount of residual damage on skid trails.</p> <p>Large dry wash on edge of unit - detention pond located at top of wash at the border of the field/forest has reduced the scour of the wash, as a large layer of leaf litter is present in the wash.</p> <p>Discussions: Dry washes, historical land use and how to work with degraded features left from past activity.</p>
<p>13 June 17, Tuesday</p>	
<p>FMU/Location/ sites visited</p>	<p>Activities/ notes</p>
<p>Dodgeville – Boatwright</p>	
<p>Fey Order #25-009-2005</p>	<p>20 acre very steep tornado salvage with a skid trail intermittent stream crossing with logs that were removed with no issues. Good water bars on haul roads and skid trails. Landowner recently put the property under a conservation easement</p>

Fey Order #25-010-2013	14 acre timber stand improvement cut with removal of aspen clones, oak wilt mortality and oak thin with good stocking and minimal damage to residuals. Good water bars and grass on haul road and skid trails. Management plan followed and no issues observed.
Pickhardt Order #25-052-1995	44 acre stand improvement cut to salvage and manage oak wilt resulting in 4 patch cuts and understory thinning in between. Potential NHI elements were identified and harvest was restricted frozen ground. Landowner has burned the sale area to reduce competition and promote oak regen. Management plan followed and no issues observed.
Anderson Order #25-011-2016	Foresters: Tom Hill, Jason Sable and Jerry Crow Specialist – Sadie Brown 80 acre patch selection harvest (stand 5) and overstory removal (stand 4). Perennial stream crossing with no issues. Harvest done in conjunction with a site prep grant to cut down and spray undesirable trees. Management plan followed and no issues observed.
Richland Center – Jacquain	
Zubaty property: 12-033-2002	Group selection, single tree selection, patch selection harvest, 35 acre clearcut (relying on regeneration by seed), Overstory Removal. Denied approval due to high grading and mitigation measures prescribed by DNR forester. Interviews with landowner and logger responsible for harvest. Confirmed compliance to mitigation measures are underway.
Gearhart: 53-022-2016	Group selection, overstory removal, 104 acres. Cooperating forester.
Jewell property: 53-005-2006	Thinning, sanitation and salvage cutting, 40 acres. Landowner management activity.
Deckert property: 53-025-2006	Group selection, thinning, DNR review at landowner request, 37 acres.
Richland County Campus Foundation: 53-021-2012	Group selection, single tree selection, shelterwood harvest – preparatory cut, 118 acres. Cooperating forester sale. DNR review at landowner request. Marked, not yet cut.
Spring Green – Matteo	
Wickman property: 57-095-2004	Group selection, single tree selection, aspen regeneration cuts, clearcuts (relying on regeneration by seed), and overstory removal, on 40 ac. Patch clearcuts, overstory removal and coppice cuts are being conducted in aspen patches and areas with mature, declining oak. Mechanical and hand felling completed. Consulting forester accompanied us on the site visit, landowner present for part of the site visit. Clear open communication evident between landowner, consulting forester, and DNR forester, based on interviews and observations. Bats are potential NHI hits, foresters interviewed were cognizant of features to look for in the landscape to identify hibernacula. Good aspen regeneration viewed. Slash well distributed, no residual stand damage viewed, small patch at north side of cut not completed due to access and wet weather.
Westphal property: 57-013-2006	Aspen regeneration cuts, clearcut (relying on regeneration by seed), overstory removal, thinning, on 73 ac. DNR Forester Kloppenburg, established timber sale in conjunction with WFLGP grant project.

	<p>Landowner is cutting/hauling products to landing to sell on the landing. 11/11/15.</p> <p>NHI had several hits, timing restrictions used to avoid species, harvest limited to Aug 16th to March 31st only and to avoid rocky outcrops and openings in the fall & spring. Stand 1 cut not completed, TSI work to be done by landowner after main harvest occurs (removal or girdle all stems 1" and larger except marked trees, and herbicide treat stems of non-oak trees, grapevine, & ironwood).</p> <p>Large cherry and shagbark marked to be retained. Wildlife trees retained with pileated woodpecker evidence. Landowner worked with DNR forester to layout trails, good low stumps viewed in harvested areas.</p>
<p>Fuchs property: 57-060-2003</p>	<p>Regeneration harvest/overstory removal, additionally described as group selection, thinning, sanitation and salvage cutting on 40.35 ac. Sale initially marked by Forester/Log buyer; after review by DNR forester, additional stems marked with red paint by DNR.</p> <p>Previous historic high grading has left poor stems of marginal quality. Stand needs to be 'reset' to grow quality trees. Recent storms have led to many additional blowdowns in the stand, leading to the site to need even more TSI. Sale not completely cut, many marked stems seen scattered throughout stand.</p> <p>Logs were moved from landing in harvest area to roadside for ease of loading double log trailers. Interview with employee loading logs roadside, discussed trip tickets, how loads are identified by logger job # and kept separate, required items to complete on the trip ticket. This contractor is one who does make use of the MFL's FM/CoC certified wood and they also carry a CoC certificate.</p> <p>Small amount of rutting & erosion on main skid trail, job not closed, however logger is not active as it is oak wilt restriction time. Logger noted on CN is not up-to-date with FISTA training, one previous training completed 2016, and other past trainings completed 1997-2004.</p> <p>Discussions: How MFL and Certification fits into the local demand, there seem to only be a few larger logging companies that utilize the certified wood, as this location is far from the industrial mills and paper markets found in northern WI. How FM and CoC work in the larger picture in WI and elsewhere. Need to TSI to occur on these degraded stands and who is willing to pay for it and complete it.</p>
<p>Luetscher property: 57-050-2005</p>	<p>Group selection, single tree selection, aspen regeneration cuts, clearcut (relying on regeneration by seed), thinning, on 23 ac.</p> <p>Landowner present for site visit. Patch cuts not complete, still need removal of remaining small stems in order to maintain adherence to Management Plan prescription. Wildlife trees marked and retained. Marked boundaries viewed.</p> <p>Landowner did not understand the harvest prescription that the logger completed. DNR forester and other DRN staff exhibited excellent communication to address landowner concerns and educate him about TSI & invasive issues, such as the multi-flora rose present on his property and potential cost-share grants; DNR will come back on-site to mark</p>

	<p>additional trees so landowner can see the additional work to be completed and he can complete needed TSI on his own. Dry wash near field with many tops felled into it.</p> <p>Discussion: Dry wash & tops. Issues with limited understanding/communication between Forester/logging contractor & landowner when DNR is not involved in the CN review.</p>
McKenna Property: 57-025-1998	<p>Overstory removal, thinning of red pine in a mostly red pine stand on 22 ac. Completed. Landowner joined the site walk. Cut stems treated for annosum root rot. NHI hit for turtle (viewed in WisFRS) is outside the harvest area. Very clean harvest with red pine removal and some white pine thinning. Wet areas and sand-blow pockets viewed and avoided. Good landowner-DNR interactions.</p>
14 June, Wednesday	
FMU/Location/ sites visited*	Activities/ notes
Poynette – Boatwright	
Nelson Order #11-008-2002	<p>Stand was split into two parts. Part A 8ac: Had heavy oak wilt designated for a clearcut. Part B 13 ac: Single tree selection designation. The east side of the stand was taken by oak wilt and has converted back to cherry and elm. Harvest restriction to dormant season due the potential NHI occurrence.</p> <p>Mandatory practice of 2013 TSI dropped due to discovery of oak wilt. No issues observed.</p>
Jakubowski Order #11-015-2014	<p>51 acre area had a 2014 mandatory practice of single tree selection. DNR visited the site and discovered oak wilt so the prescription was changed to removing diseased trees, harvesting a buffer and making patch cuts. The tract is in an area with a decent pulpwood market to the patch cuts were well done.</p> <p>No issues observed.</p>
Lyons Order #11-015-2005	<p>11 acre oak regen harvest removing all stems 1” in diameter and greater except the marked oak seed trees. Good advance regen in spots. Mandatory practice followed.</p>
Stracke Order #11-022-1995	<p>Marked and not cut. 27 acre red pine thinning and red pine pocket decline removal with buffer. Good take tree selection with target basal area remaining.</p> <p>Mandatory practice followed and no issues observed.</p>
Reinke Order #11-004-2011	<p>24 acre group selection harvest to promote natural conversion to sugar maple and other northern hardwoods. Site prep by logger within the gaps included removal of ironwood and other non-commercial species. Winter harvest due to potential NHI occurrence. Good stocking with little damage to residuals.</p> <p>A perennial stream crossing was attempted and abandoned due to the approached breaking up.</p> <p>Management plan followed and no issues observed.</p>
Baraboo – Jacqmain	
Kharbush property: 57-080-2004	<p>Combined clearcut, overstory removal plus thinning arranged on 41 acres. Cooperating forester sale cut fall/winter 2015-2016. Harvest prescription included frozen ground harvest for stream crossings, water</p>

	bars, and equipment cleaning prior-to and following harvest. WIDNR review provided additional recommendations for: improvements to skid trails and crossing area in sale; treatment of identified invasives; and mid-story canopy release to increase sunlight for regeneration.
Schultz property: 57-021-2002	Single tree selection, overstory removal, 22 acres. Harvest done by horse logging winter 2015. Sale set up by non-registered, consulting forester. Harvest restricted to frozen dry ground only. Also harvested some 7 foot lengths of ironwood for shiitake mushroom production.
Luehrsen property: 57-020-2014	Oak shelterwood 1 st entry on 23 acres. Harvest completed 2013-2014. Additional combined sanitation/salvage harvest marked for cut and group overstory removals to release advanced sugar maple regeneration. Harvests options set up in case scattered overstory trees continue to die in stand. Cooperating forester sprayed for multi-flora rose (invasive). Discussion: Trainings – invasives and other subject training during Forest In-service trainings.
Zeman property: 57-051-2003	Single tree selection, thinning, sanitation and salvage cutting set up, not yet cut on 36 acres by non-accredited forester. Mortality and die-back from combination of oak-wilt, Two-lined chestnut borer, and armillaria. Improvement thinning using basal area targets using order removal. Preference removal of ash and elm. Designated wildlife trees retained. Invasives and treatments recommended and equipment cleanings required before/after harvest.
Clyde property: 57-018-2014	Patch selection harvest, thinning, sanitation and salvage set up, not yet cut on 37 acres. DNR reviewed by landowner request, sale set up by Cooperating forester.
Scenic Natural Area (SNA): McGilvra Woods (RSA/HCVF)	Second growth, rich mesic southern hardwood stand along Baraboo hills. “No management” area serving as a benchmark. Rock outcroppings in interior of stand. Sugar maple and basswood dominate with black cherry, red oak, white ash, yellowbud hickory, bigtooth aspen, and white oak. Spare mid-story and rich ground flora (110 species).
Prairie Du Chien – Matteo	
Hurter Trust Property: 12-034-2014	Group Selection, Thinning on 160 ac. Cooperating Forester. Per request of the coop. forester, DNR forester met with representative of the coop. forester on site prior to marking to discuss silviculture. 1 st aspen clearcut pocket has very good growth over 6-8’ tall, minimal deer browse. Feller has exceptionally consistent cuts, extremely good technique (with almost identical hinges viewed on stumps). Good utilization, including firewood and bolts sold from site. Thinning completed on most of sale, NW portion of stand 7 viewed – marked to cut, but not yet cut. Multiple ½ - 2 ac. patch cuts viewed; TSI in these patches and other stands completed by buyer/logger at time of harvest & some to be completed in the future. Main haul road near field edge relocated to avoid a spring, another portion of the main haul system adjacent to stand 7 had a culvert blowout – road was temporarily rerouted and repaired; at closeout, a larger diameter culvert will be installed. Discussion with dozer operator

	<p>of practices to follow if stream was to be crossed & removal of material (corduroy) when crossing is finished.</p> <p>Discussion with new and relatively inexperienced consulting forester regarding streamside BMPs showed that forester had limited knowledge of the harvest requirements inside the RMZ and RMZ dimensions. While the prescription and harvest were in conformance the forester was not aware of the RMZ BMPs for differing stream size/canopy cover/BA retention requirements. However, forester was aware it is addressed in <i>Wisconsin's Forestry Best Management Practices for Water Quality</i> publication, knows where to find it, and has a copy of the book. Dry wash alongside main trail bordering Stand 7 has many lineal feet of tops dropped in the wash. Some sedimentation downhill at one location, limited water bars, no receiving water body present. Discussion: FISTA training for loggers. Dry wash & tops. Erosion/sedimentation from marginal water bars. RMZ requirements for differing stream size/canopy cover/BA retention requirements for harvesting within buffers. Definitions of dry wash & intermittent stream.</p>
<p>Duke Property: 12-025-1996</p>	<p>Single Tree Selection on 16 ac. Marked, not cut. Harvest activity to be restricted to dry or frozen soil. Existing trails to be used. NHI hits, but no direct hits in the sale, however to minimize potential impacts, recommend no logging activity from mid-March to late Oct (also covers the oak wilt timing restriction noted in the CN). Invasives noted on borders, cleaning of machinery prior to arrival at site to limit additional introductions. Wildlife trees and gaps marked. Discussion: Dry wash & tops. Definitions of dry wash vs. intermittent stream.</p>
<p>McLain Property: 12-001-1999</p>	<p>Group selection, single tree selection, aspen regeneration cuts, thinning 80 ac. Cooperating Forester. Marked, not cut.</p> <p>6/11/2015: CN lists "harvest will occur throughout MFL entry", though no harvests are scheduled in Stands 1, 3, and 4. CN submitted via e-mail from landowner. No map included. No H2O BMP details. NHI and ARCH/HIST information in reverse order on CN. Final revised CN is accurate.</p> <p>Wildlife trees and gaps marked. Cutting of stems > or = to 2" may be mandatory in gap areas marked. NHI hits for multiple species - seasonal restriction 1 April – 15 Oct to mitigate potential impacts (also covers oak wilt restriction noted in the CN).</p>
<p>Degelau Property: 12-016-1996</p>	<p>Thinning on 106 ac. Cooperating Forester. Harvest occurred in Stand 6 & 7, targeting aspen, pre-salvage ash, and elm removal.</p> <p>Harvest minimally follows written prescription and follow up will be required by DNR forester. Logger noted on CN is not up-to-date with FISTA training, last training completed in 2007. Oak wilt restriction, NHI special concern species identified, property boundaries well marked. Secondary skid trail present on a slope with no water bars installed, minimal erosion. Discussion: If TSI is required to strictly follow Management Plan, who completes TSI and when is it completed if logger does not implement it.</p>
<p>Parker Property: 12-037-1994</p>	<p>Even-aged thinning on 33 ac in walnut and white pine. Landowner. Pine thinning on every other row, walnut thin on every 3rd row. Processor</p>

	used, sold to Domtar for pulp. Letter from Landowner to DNR explaining why the “harvested volumes were quite a bit less than estimated”, and included mill tally/invoice for evidence of actual volumes harvested. Invasives species noted in low levels on-site and on the Post Timber Harvest Inspection Data Collection Form, however not noted in CN.
15 June, Thursday	
FMU/Location/ sites visited*	Activities/ notes
	Office audits DNR Central Office
Poynette – Boatwright	
Thomas Order #11-017-2014	Not yet harvested. STD 1: 15 acres red pine 1 st thin removing 3 rd row. STD 2: 11 acre aspen regen cut. STD 3: 3 acre marked white pine and spruce thinning. Management plan followed and no issues observed.
Thomas Order #11-018-1996	Landowner interviewed: Melvin Jennings 32 acre high value walnut sale marked by logger. Not a mandatory practice but sale was approved by the DNR due to the high value of walnut. No issues observed.
Cross Order #11-034-2014	104 acre mixed sale including 1 st and 2 nd thinnings in 3 pine stands and aspen regen cut and TSI cut in 3 oak/aspen stands. Sandy site with good stocking and little damage to residuals. Management plan followed and no issues identified.
Loeb Family Trust Order #11-004-2005	60 acre red pine 2 nd thin marked by consultant. Areas with red pine pocket decline and buffer were clearcut. Good stocking and little damage to residuals. Management plan followed and no issues identified.
Baraboo – Jacqmain	
Devil's Lake Oak Forest (No. 27) (SNA/RSA/HCVF)	This is a southern isolate of dry-mesic forest serves as an area ecological reference system. Natural processes will determine the structure of the forest. The oak component is projected to decrease under a passive management regime however, other State Natural Areas are managed to maintain an old-growth oak cover type. Management approach and site specific considerations are summarized and presented online, http://dnr.wi.gov/topic/Lands/naturalareas/index.asp?SNA=27 . NHI searches for parcel forest management plans include attributes and ecosystems which require consideration in development of management activities for MFL properties.
Mielke property: 57-004-2015	Single tree selection, aspen regeneration harvest, overstory removal, sanitation and salvage cutting, 72 acres. Harvested winter 2016. Set up by non-accredited forester, WIDNR reviewed at landowner request.
DDM Land property: 57-018-2013	Group selection, single tree selection, patch selection harvest, aspen regeneration cuts, and thinning, 160 acres. Prescription review and road inspection. Some washout. Water bars in place with slight variability from recommended BMP due to constraints. Issue related to damage to seeding that was done on the road, as required, by the logger. Seeds were damaged after travel by off-road vehicle by landowner.
Genevieve property:	Aspen regeneration cut, and group selection/thinning, 37 acres.

57-017-2014	Cooperating forester set up. Winter logged fall 2015. Equipment sanitation requirements for control of invasives. Discussion: garlic mustard, cost-shares for invasive treatments, property boundaries.
Laird Family Trust property: 57-118-2005	Shelterwood Harvest – Final Cut, 102 acres. High value red oak shelterwood removal following successful regeneration. Set up not yet cut.
Devil’s Lake Break	State Forest archaeology site. Discussion of SNAs and State Parks as RSAs and HCVFs and how they are researched and considered during forest management planning.
Solum Lane Sale/Hwy 113 Planting	Variety of tree species planted by landowner. Discussion of cost-share programs, engagement by landowner/group members.
Prairie Du Chien – Matteo	
Welke property: 12-012-2000	Single Tree Selection on 38 ac. DNR. Closed. Thin from below, primarily oak harvest with lesser amounts of cherry, aspen, walnut, elm. Small amount of deer browse observed, no residual damage, very clean site – difficult to tell harvest occurred except for tops and improved woods roads. One NHI hit, no mitigation required, as not known to nest in or near sale area.
Ehlert property: 12-053-2004	Group Selection, Single Tree Selection, Overstory Removal, Thinning on 38 ac. Cooperating Forester. Closed. Consulting forester and landowner accompanied site visit. Lineal gaps viewed on hillside, group selection on top of slope. No damage to residual stems. Blue paint on crop/release trees. Local, DNR approved trail seed mix used, with the addition of creeping red fescue. Large diversity of herbaceous species on site. Trails recently seeded and despite large recent rains, main haul road has held up well with minimal erosion and grass is sprouting. Broad-based dips viewed on haul road. TSI in patch cuts to be completed in the future, some trees marked, other TSI to be completed based on written description of work. Widespread garlic mustard actively being pulled to limit spread. Excellent communication between Forester-DNR-Landowner. Discussion: “Wedge” cuts for group selection on slope, as tops all want to fall downhill.
HMF property: 12-013-2000	Patch Selection Harvest on 80 ac. Non-Coop Forester. Active. Harvest in or planned for Stands 5-9. Forester accompanied us on site visit. Invasives are challenge in Stand 7, noted in CN & Management Plan. Short window to cut, due to landowner timing needs (deer season) and oak wilt restriction, Stand 7 not cut. Harvest minimally follows written prescription, patch clearcut still has a number of remaining stems, and TSI is needed post-harvest. DNR forester will follow up, with an additional mandatory practice to be noted in WisFRS, as per field discussion with the Forester – logger does not intend to come back to cut Stand 7 and his forester/logger has expired. Honeysuckle in stand 7 is an obstacle to access, harvest, & regeneration.
McDevitt property: 12-013-2003	Single Tree Selection on 23 ac. Logger. Closed. CN created and stand marked with single tree selection by a logger broker, who does not have

	<p>industry education, only on the job experience; no formal training for BMPs or marking timber completed. Logging completed by a contracted logger, site closeout also completed by the logger broker. DNR review of the plan is mandatory.</p> <p>Aspen CC still needs completion and also need for TSI; will be followed up by DNR per Post Timber Harvest Inspection Data Collection Form.</p> <p>Lots of elm, low quality maple, & locust remain. Waterbars in most of site minimally installed, not fully functioning. Large dry wash interior to Stand 1 with many tops felled into it.</p>
15 June, Friday	
FMU/Location/ sites visited*	Activities/ notes
8:00 AM – 12:00	Office Audits DNR Central Office
12:00 PM – 1:00 PM	Closing Meeting Preparation: Auditor(s) take time to consolidate notes and confirm audit findings
2:00 PM	Closing Meeting and Review of Findings: Convene with all relevant staff to summarize audit findings, potential non-conformities and next steps. Reviewed difficulty auditing given major restructuring of MFL staff and offices; presentation of the audit conclusions; new CARs and OBS and their classification; confidentiality and public summary; questions.

2.2 Evaluation of Management Systems

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME’s conformance to FSC standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observation of implementation of management plans and policies in the field, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, stakeholder comments, and reviewed documents and records. Where consensus between 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. Changes in Management Practices

There were no significant changes in the management and/or harvesting methods that affect the FME’s conformance to the FSC standards and policies.

Significant changes occurred since the last evaluation that may affect the FME’s conformance to FSC standards and policies (*describe*):

2015 Changes:

Severance and Yield Taxes were discontinued as of April 16, 2016. WIDNR approval was no longer required prior to cutting if the cutting notice was submitted by someone on the *Cutting Notice*

Registration list; **and** the cutting is mandatory and in accordance with the registered forest management plan.

2016 Changes:

The *Cutting Notice Registration List* was broadened to include or a person who has 5 years full-time experience engaged in managing forests in addition to Cooperating Foresters; foresters accredited by the Society of American Foresters, Wisconsin Consulting Foresters (WCF), or the Association of Consulting Foresters (ACF). As part of this change, Cutting notices are still required to be submitted 30 days prior to cutting regardless of who fills it out and if approval is not required, cutting may commence following the filing of the Cutting Notice Form. However, if the Cutting Notice is completed by a non-registered/approved forester, approval by WIDNR forester must be completed. With ultimate responsibility for following the rules and regulations of the program, landowners/group members indicate on the cutting notice if they would like the DNR to review the cutting notice (opt in).

4. Results of the Evaluation

4.1 Existing Corrective Action Requests and Observations

Finding Number: 2016.1	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-US 1.1.a
Non-Conformity (or Background/ Justification in the case of Observations):	
<p>During interviews with DNR foresters that work with MFL group members, there is much confusion on what actions staff can take when group members' cutting notices are missing information or otherwise incomplete since DNR no longer has to approve or disapprove them when the review box remains unchecked. DNR approval is still required when the review box is checked. A FAQ was prepared and distributed to some staff (note: this is not dated) that mentions that concerns can be documented in the group members' files and communicated to the accredited forester. According to the updates to the law, an accredited forester may not necessarily be the administrator of an MFL cutting notice. It is also unclear to staff what actions staff can or should take in order for an MFL group member to avoid a potential enforcement action should one be discovered after the cutting notice is filed. For example, if NHI or archeological information was not reviewed by the cutting notice administrator and it was later discovered that these features were present, staff may need guidance on possible actions.</p> <p>FME has identified this issue during the 2016 internal audit of the MFL program, which justifies the grading as an OBS since the FME is already working on resolving this issue.</p>	
Corrective Action Request (or Observation):	
To facilitate legal compliance, FME should ensure that employees, commensurate with their responsibilities, are duly informed about applicable laws and regulations.	
FME response (including any	<u>Documents:</u> <ul style="list-style-type: none"> FinalVers_Responses_to_2016_External_Audit_Observations.docx

<p>evidence submitted)</p>	<ul style="list-style-type: none"> • UNIT 1.pptx (powerpoint) • 2017_TaxLaw_Map.pdf • [internal audit document] <p>Response: WIDNR detailed the trainings held to inform relevant WI DNR Forestry staff Cooperating Foresters, and other external partners.</p>
<p>SCS review</p>	<p>Submitted documents were reviewed confirming the content of the update sessions covered subjects raised in Observation 2016.1. Specifically, slides 13-17 of the UNIT 1 powerpoint addresses Cutting Notices.</p> <p>It should be noted that the training powerpoint included notification and implications for several other changes made to the MFL program important to duties and responsibilities of WI DNR Forestry staff Cooperating Foresters, and other external partners. These changes included a restructuring of the WIMFL Program staff. Beginning July 1, 2017, WIDNR will implement the new Tax Law Section model developed during the WIDNR Alignment process (shown in 2017_TaxLaw_Map.pdf). These changes are detailed in Section 3 of this 2017 audit report.</p> <p>These trainings and materials were update sessions were held in October 2016 in five separate geographic locations throughout the state with a total of 190 DNR staff and 198 non-DNR Staff (Certified Plan Writers, and other forestry professionals) attending. Responses to this finding are sufficient to warrant closure of this Observation.</p>
<p>Status of CAR:</p>	<p><input checked="" type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input type="checkbox"/> Other decision (refer to description above)</p>

Finding Number: 2016.2	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-US 6.3.h
Non-Conformity (or Background/Justification in the case of Observations):	
<p>In Pierce and Barron Counties, invasive species were observed on several group member FMUs (e.g., <i>Rhamnus</i> spp.). While some sites are infested, eradication efforts would be too costly at this time considering that the overstory will undergo final harvest 40-50 years from now. On other sites, however, invasive species are present at low levels in a few locations, so early detection and control may be possible in partnership with county-level cooperative weed management groups that are in the early stages of formation.</p>	
<p>6.3.h The forest owner or manager should assess the risk of, prioritize, and, as warranted, develop and implement a strategy to prevent or control <i>invasive species</i>, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species. 	
FME response (including any evidence submitted)	<p>Documents:</p> <ul style="list-style-type: none"> • <i>FinalVers_Responses_to_2016_External_Audit_Observations.docx</i> • <i>CISMA_MAP 2016.pdf</i> • <i>Restoration Contractors 2017.pdf</i> <p><u>Response:</u> The Wisconsin Legislature created the Wisconsin Invasives Species Council to assist the WDNR in establishing a statewide program to control invasive species. Their website http://invasivespecies.wi.gov/ provides information related to awareness and activities, but most importantly, provides an interactive list with links to government agencies and private foundations that provide cost-sharing and grants for invasives control. WDNR maintains a website providing further information and resources for the private landowner http://dnr.wi.gov/topic/Invasives/classification.html. An additional WDNR website provides Best Management Practices information for all invasive species http://dnr.wi.gov/topic/Invasives/bmp.html and includes a link to the Wisconsin Council on Forestry's website which details Best Management Practices for invasive species found specifically in the forest environment http://www.wisconsinforestry.org/initiatives/other/invasive-species-bmps/forestry-bmps.</p>

	<p>WDNR employs a Forestry Invasive Plants Coordinator working with the Weed Management Area – Private Forest Grant Program (WMA-PFGP). The WMA-PFGP was created to establish procedures and standards for the administration of grant program for Weed Management Areas, and to distribute other available state and federal funds through grants for the purpose of encouraging Weed Management Groups (WMGs) and NIPF landowners to control invasive plant species on private forest lands. The WMA-PFGP is a reimbursement program that covers up to 75% of the eligible costs, 25% match is required. Some invasives plant control cost-sharing is available through the state-funded Wisconsin Forest Landowner Grant Program (WFLGP). The DNR Invasive Plants Coordinator also works with established Cooperative Invasive Species Management Areas (CISMAs) that work locally to address invasives control efforts (see <i>CISMA_MAP 2016.pdf</i>). Finally, WDNR is also active in educational and outreach efforts to communicate invasives information to partners engaged in land and resource management, as well as private forestland owners. Annually, Forest Health Section staff provide invasives training workshops to various organizations including the Wisconsin Woodlands Owners Association (WWOA), Wisconsin Master Loggers program, and the Forest Industry Safety & Training Alliance (FISTA). Landowners can locate certified pesticide applicators by checking on the website maintained by the Wisconsin Department of Agriculture, Trade, and Consumer Protection http://www.kellysolutions.com/WI/Applicators/. In addition, a list of ecological restoration contractors whose focus is mainly on invasive plants is maintained and available to DNR Foresters and landowners</p>
SCS review	<p>SCS review of evidence, interviews with staff and landowners in the field and inspections of sites in the field confirm these information sources and tools references are being implemented by foresters, landowners, and contractors in the field. Evidence reviewed warrant closure of this Observation.</p>
Status of CAR:	<p><input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i></p>

Finding Number: 2016.3	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-US, FF 7.1.a.v
Non-Conformity (or Background/Justification in the case of Observations): While the chance of RSAs or HCVFs to occur on MFL properties is low, the person in charge of the RSA/HCVF assessment processes retired. Properties reviewed during the 2016 audit did not have RSAs or HCVFs as described in FSC-US guidance. However, FME should consider summarizing the results of these assessments in the overarching group management documents to ensure that they can be readily located for interested parties.	
Corrective Action Request (or Observation): A written management plan exists for the property or properties for which certification is being sought. The management plan should include a description of environmental assessment and safeguards based on the assessment, including approaches to protect representative samples of existing ecosystems (see Criterion 6.4) and management of High Conservation Value Forests (see Principle 9).	
FME response (including any evidence submitted)	Wisconsin DNR has a well-developed system of State Natural Areas (SNA's) which serve as RSAs and HCVFs. For public informational purposes, WIDNR maintains an interactive public website for location and description of all State Natural Areas http://dnr.wi.gov/topic/lands/naturalareas/ . The website includes listings of SNAs alphabetically by name as well as an interactive state map with SNAs listed by county. Each SNA has descriptive text noting specific features, access descriptions and a property map, available for use in conjunction with MFL maps by WIDNR staff, consultants or other forest managers.
SCS review	SCS included two sites for sampling during the 2017 audit that represent RSAs: the McGilvra Woods SNA and Devil's Lake State Park. The website above was reviewed. Interviews with staff foresters reflect training and confirm that adjacency to SNA's is accounted for during planning. Each SNA has management and monitoring objectives provided in public summary. The McGilvra Woods, for example, is being maintained under passive management to serve as a reference ecosystem (see Itinerary section of this report for more site detail). Management plans for SNAs and State Parks are respected when any adjacent landowners may impact those objectives. NHI database/website includes designated HCV to be searched similar to RTE. As with RTE, for public use, HCV are unidentified occurrence and users are then required to consult with DNR staff to determine if there are any mitigation needs for forest management.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2016.4	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-US 7.3.a.
Non-Conformity (or Background/ Justification in the case of Observations): Continuation of OBS 2015.2. Due to changes to the Managed Forest Law, mainly in allowing people with little to no accredited training or education to administer cutting notices (i.e., plan and manage timber harvests and other management practices), risk of improper or inconsistent implementation of the management plan has increased since DNR review and approval of cutting notices prior to harvest is no longer required on those cutting notices where the review box is unchecked. Now that a broad range of forestry, logging, wildlife, and recreation professionals with a minimum of five years' experience can fill out cutting notices, archaeological reviews (FF 3.3.a), timber harvest levels (FF 5.6.a), environmental impact assessments (6.1.a), NHI reviews (FF 6.2.a and FF 6.4.a), the management plan (FF 7.1.a), and other indicators that deal with harvest planning and implementation could be at risk. FME has identified this issue during the 2016 internal audit of the MFL program, which justifies the grading as an OBS since the FME is already working on resolving this issue.	
Corrective Action Request (or Observation): Workers should be qualified to properly implement the management plan; all forest workers should be provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	
FME response (including any evidence submitted)	<u>Documents:</u> 24505.20_Timber_Harvesting.docx 24505-31_DRP.docx <u>Response:</u> WIDNR has updated the Forest Tax Law Handbook (currently nearing completion of public review prior to general release). Update includes detailed procedural steps and guidance for Harvesting on MFL. Guidance incorporates information relative to Act 358. If a CN meets the requirements for submission with no DNR review or approval requested, and either a complaint is received or the DNR Forester inspects during active- or post-harvest and finds that harvesting was inconsistent with the management plan or the CN prescription, then the standard enforcement procedure will be initiated with the landowner. If a Cooperating Forester is part of the process, then a separate Compliance Action could be initiated if the Cooperator was found to be at fault.
SCS review	Provided documents were reviewed and content determined to be consistent with WIDNR's response above. Additional interviews with forestry staff demonstrated clear understanding of WIDNR MFL foresters' roles and responsibilities. An example of implementation was observed during inspection of the Zubaty site (see Itinerary section of this report for additional detail) whereby standard procedures led to mitigation ensuring adequate implementation of the FMP. Reviews of evidence and observation of implementation in the field confirm closure of this Observation is warranted.

Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>
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Finding Number: 2016.5	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-US 8.4.b
Non-Conformity (or Background/ Justification in the case of Observations): In many cases, FME has access to regeneration monitoring information at the county and/or group member level. There may be an opportunity to use this information as part of an adaptive approach to meeting regeneration or stocking levels of desirable species where ungulate-browse pressure is high.	
Corrective Action Request (or Observation): Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures should be revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines should be modified.	
FME response (including any evidence submitted)	<u>Documents:</u> <i>ForestRegenMetricversionApril2017.doc</i> <u>Response:</u> The Division of Forestry created a Natural Regeneration Ad Hoc Team to review and recommend natural regeneration monitoring protocols in an effort to provide a more cohesive statewide strategy for achieving successful natural regeneration. Forest regeneration was identified as an implementation issue in the Division’s prior Strategic Direction. Forest regeneration monitoring was also identified as an opportunity for improvement in forest certification audits on state and private lands. The team makeup includes foresters from different management interests (DNR, forest industry, county forest, private lands, and consulting foresters). Their charge is to review current DNR <u>Silviculture Handbook</u> guidance on regeneration monitoring methods and standards, standardize the format of regeneration for differing cover types (especially where lacking), develop efficient and effective monitoring protocols, collect and manage reforestation monitoring data, and define forester responsibilities in monitoring forest regeneration. The group is scheduled to have its final products and recommendations available by the end of

	<p>2017.</p> <p>One tool that has been recently developed in conjunction with the Nat'l Regen Ad Hoc Team is a Forest Regeneration Matrix which can be applied to help assess levels of herbivory. Another area where regeneration concerns are placed into the decision-making process is through participation in the County Deer Advisory Councils (CDAC).</p>
SCS review	<p>The forest regeneration metric document (regen tool) was reviewed and interviews were conducted with forest staff in the field. Use of the regen tool and CDAC's were discussed during field inspections with forestry staff. For example, at the Leuhrsen property where an oak shelterwood first-entry-harvest was completed, forestry staff on-site engaged in involved discussion of regeneration success measures specifically referencing the new regen tool. Additional sites and examples were provided demonstrating a high degree of retention and use by field forestry staff. The long-term nature of the Forest Regeneration Matrix and county-level Deer Advisory Councils and consistent use by field staff demonstrates commitment and capability to modify objectives and guidelines warranting closure of this Observation.</p>
Status of CAR:	<p><input checked="" type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input type="checkbox"/> Other decision (refer to description above)</p>

Finding Number: 2016.6	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC-STD-30-005, 3.2 and 3.3
<p>Non-Conformity (or Background/ Justification in the case of Observations): Due to changes to the Managed Forest Law, mainly in allowing people with little to no accredited training or education to administer cutting notices, the FME risks being able to maintain procedures that are sufficient to establish an efficient internal control system to ensure that all members are fulfilling applicable requirements.</p> <p>Since updates to the Managed Forest Law have allowed greater flexibility in allowing who can administer cutting notices, qualifications and training measures for involved personnel may need to be revised and updated.</p> <p>FME has identified this issue during the 2016 internal audit of the MFL program, which justifies the grading as an OBS since the FME is already working on resolving this issue.</p>	
<p>Corrective Action Request (or Observation): The Group entity's procedures should be sufficient to establish an efficient internal control system</p>	

<p>ensuring that all members are fulfilling applicable requirements.</p> <p>The Group entity should define the personnel responsible for each procedure together with the qualifications or training measures required for its implementation.</p>	
<p>FME response (including any evidence submitted)</p>	<p>DNR maintains a <i>Cutting Notice (CN) Registration List</i> of private sector individuals that are either Cooperating Foresters (through DNR’s Cooperating Forester Program), Accredited Foresters (membership in SAF, ACF, WCF), or Other Professionals (5+ years’ experience). The CN Registration List is available to DNR Foresters when entering a Cutting Notice into the WisFIRS tracking system. A current check of the Registration list shows 442 individuals registered with 34 shown as Other Professionals (7.7%). An observational review of those Other Professionals registered indicates that most are either graduate foresters (20) or technicians (2) with a smaller percentage being logging contractors (12).</p> <p>Changes to the Forest Tax Section being initiated July 1, 2017 will result in fewer DNR Forester positions (34 vs. 120+) being directly involved in cutting notice review and processing, with an anticipated higher level of staff knowledge and experience in forest tax law program administration with a more concentrated and consistent treatment of CNs and subsequent communications with private-sectors foresters, other professionals. With fewer DNR Foresters charged with tax law work, staff can develop and cultivate strong working relationships with private sector foresters, other professionals, landowners, and logging contractors, and can tailor guidance and education on the CN process to specific cases and individuals.</p> <p>Currently there has been no training specifically targeted to Other Professionals. General educational opportunities related to Cutting Notices and timber sales can be found in several places.</p> <ul style="list-style-type: none"> • A number of topics related to the MFL and FCL programs including timber harvesting and the video series on Cutting Notice preparation done in 2015 are maintained on the DNR Forestry Website for viewing http://dnr.wi.gov/topic/ForestLandowners/ • The updated Forest Tax Law Handbook will be released later this year and will include changes in the CN process initiated both prior to and after Act 358. (The current version of the Forest Tax Law Handbook is available on-line.) • Additional resources providing information on Lake States silvicultural practices, forest management, and timber sales procedures can be found in the DNR Silviculture Handbook, the Wisconsin Forest Management Guidelines, and the DNR Timber Sale Handbook, all available on-line at http://dnr.wi.gov/topic/ForestManagement/
<p>SCS review</p>	<p>Websites with video series, current and draft Forest Tax Law Handbook were reviewed relative to this topic, and the reference materials listed on the Forest Management page of the website above were confirmed. Interviews with consultants in the field confirmed knowledge of the above references and inspection of these sites were in conformance. WIDNR procedures around review of CN prior to harvests and post-harvest inspections were examined over multiple sites in the field for each category of the <i>Registration List</i> (reviewed in office portion of the audit). Field inspections, document review and interviews in the</p>

	field demonstrated effective implementation and effective internal control systems.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2016.7	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
FSC Indicator:	SCS COC indicators for FMEs, 2.1.
Non-Conformity (or Background/ Justification in the case of Observations): Since the MFL and Forest Crop Law (FCL) lands share many of the same forms, an FCL property was marked as certified in the cutting notice (Order # 16-001-1998). The land manager in this case has lands enrolled in both programs. Since no harvest has occurred yet, there is still an opportunity to address this situation before it could result in a non-conformance.	
Corrective Action Request (or Observation): Products from the certified forest area should be identifiable as certified at the forest gate(s).	
FME response (including any evidence submitted)	<p>The Forest Tax Law Cutting Notice form (Form 2450-032 (R 10-16) http://dnr.wi.gov/files/PDF/forms/2400/2450-032.pdf) requires that the form being submitted is identified as either an MFL or a FCL property per a checkbox on page 1. On page 2 and subsequent volume reporting pages, the DNR's Group Certificate Numbers are listed at the top of the page along with a checkbox indicating if the lands are certified or not. The Order Number is also required to be written on the form for proper reference. When reviewing CNs, WIDNR Foresters are required to ensure lands listed on the CN are either part of the Certified Group or not, by checking the individual order number in WisFIRS, following which they have the opportunity to correct any errors at this point.</p> <p>Determining whether or not a particular landowner is included in the MFL Certified Group is information readily available to private sector foresters, loggers, industry, and other interested parties. WIDNR Division of Forestry maintains a list of all MFL order numbers/landowners that are part of the Certified Group on a public website http://dnr.wi.gov/topic/TimberSales/ which is easily accessed for verification. Additional information on the MFL Certified Group is also found on the webpage.</p>
SCS review	Review of websites and procedures found the above information to be accurate in describing available information. Interviews with staff confirmed knowledge of procedures and conformance in the field was verified. Procedures and reference information for identifying certified products at the gate warrant closure of this Observation.

Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>
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4.2 New Corrective Action Requests and Observations

Finding Number: 2017.1	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	US FM 6.5.d
<p>Non-Conformity (or Background/ Justification in the case of Observations): BMPs for water bar installation were consistently applied across most audit sites in accordance with <i>Wisconsin’s Forestry Best Management Practices for Water Quality</i> (page 53). However, other timber sale areas with on-going or completed harvest activities had slight to minor amounts of water run-off on skid and haul roads within harvest areas and instances of incomplete or insufficient water bars. These roads were nonetheless in conformance justifying this finding as an observation.</p> <p>Examples observed in the field: MFL Order Numbers: 57-095-2004, 57-060-2003, 12-034-2014, 12-016-1996, 12-013-2003, 57-018-2013, 11-015-2005, 57-018-2013. Detailed information for these sites are included in Section 2.1 of this audit report.</p>	
<p>Corrective Action Request (or Observation): WIDNR should ensure that the transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes ensuring that erosion is minimized and sediment discharge to streams is minimized.</p>	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2017.2	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	30-005 5.1.v
Non-Conformity (or Background/ Justification in the case of Observations): Interviews with forestry field staff discovered that some Cutting Notice data are not being updated in WisFRS in accordance with procedures for maintaining group records. Although the majority of Cutting Notices are being entered, staff acknowledges a number of foresters have fallen behind. However, this was discovered by internal audits conducted in 2016 and the WIDNR has already formed corrective action plans and begun taking steps to make corrections. The IAR was reviewed with upper management - Met with Tax Section Team Leader, Public and Private Forestry Section Chief, Forest Management Bureau Director, Certificate Manager, Certificate Coordinator - reviewed results of internal audit results (management review), Monday April 4, 2016. Internal detection, investigation, and corrective action plans already underway justify this finding as an Observation.	
Corrective Action Request (or Observation): Records related to Cutting Notices that internal procedures require be entered into WisFRS database are to be kept up-to-date. WIDNR must ensure that documentation and records regarding recommended practices for forest management (i.e. silvicultural systems) are maintained and up-to-date.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2017.3	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-STD-50-001-v1-2 Sec. 1.15, 1.16

<p>Non-Conformity (or Background/ Justification in the case of Observations):</p> <p>1.15 - The first use of “FSC” is not accompanied by the trademark symbols ®.</p> <p>1.16 - Incorrect trademark use was found and no record of approval for use of the promotional FSC trademarks was provided.</p> <p>Managed Forest Land and Forest Certification Fact Sheet, a downloadable pdf document found at: http://dnr.wi.gov/topic/timbersales/documents/ManagedForestLandAndForestCertificationFactSheet.pdf does not include the ® symbol for the first use of FSC in the Fact Sheet and it is not clear if logo approval has been applied for or approved.</p> <p>The above link to the fact sheet is found at: http://dnr.wi.gov/topic/timbersales/mfl.html#members</p>	
<p>Corrective Action Request (or Observation):</p> <p>The use of the FSC “checkmark-and-tree” logo shall be directly accompanied by the trademark symbols ® or ™ (in superscript font). The symbol, which represents the registration status of an FSC trademark in the country in which FSC certified products or materials are to be distributed, is an intrinsic part of the logo. The appropriate symbol shall also be added to “FSC” or “Forest Stewardship Council” for the first use in any text. The registration status of the FSC trademarks for the respective country is listed in Annex 1.</p> <p>The organization shall submit artwork of all new reproductions of FSC trademarks to the certification body for approval.</p>	
<p>FME response (including any evidence submitted)</p>	<p>Logo has been updated on WIDNR website at: http://dnr.wi.gov/topic/TimberSales/documents/ManagedForestLandAndForestCertificationFactSheet.pdf</p>
<p>SCS review</p>	<p>Client has already completed the required steps to be in compliance, prior to report submission. Logo has been updated on WIDNR website at: http://dnr.wi.gov/topic/TimberSales/documents/ManagedForestLandAndForestCertificationFactSheet.pdf with logo use applied for and approval granted for Case #202246 on 19 June 2017. Michelle Matteo, 19 June 2017.</p>
<p>Status of CAR:</p>	<p><input checked="" type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input type="checkbox"/> Other decision (refer to description above)</p>

5. Stakeholder Comments

In accordance with SCS protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. Distinct purposes of such consultation include:

- To solicit input from affected parties as to the strengths and weaknesses of the FME’s management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

Principal stakeholder groups are identified based upon results from past evaluations, lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources (e.g., chair of the regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders in this evaluation:

5.1 Stakeholder Groups Consulted

Group members	Consulting foresters and certified plan writers
Timber buyers	Procurement foresters
FISTA – Logger training	

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

5.2 Summary of Stakeholder Comments and Responses from the Team, Where Applicable

<input type="checkbox"/> FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual audit.	
Stakeholder comments	SCS Response
Economic concerns	
What is going to happen to payments to Counties when things are changed again? [Forest mill tax eliminated]	Wisconsin state law currently requires that Counties be paid as authorized under Resource Aid Payments (Link, http://docs.legis.wisconsin.gov/document/statutes/23.09(18)).
Social concerns	
The DNR forester was very helpful in understanding the why I need a forest management plan, not just for lowering my taxes but for making sure my grandkids understand what I wanted for my forest and they’re out here helping me now.	No response needed.
Environmental concerns	
We were worried about having our woods chopped off and of a tearing up our trails. But the logger did a good job and we used the contract template the consultant said came from the	Interviews with landowners were consistent with this provided comment which are, overall, included as evidence of conformance by the WIDNR. Reviewed evidence including the following: <ul style="list-style-type: none"> • Links to publicly available information for MFL related resources and tools,

<p>DNR’s website. They didn’t finish the job just the way it was wanted but the DNR and consultant is helping us get it fixed. I will take more say in the management plan moving forward.</p>	<p>http://dnr.wi.gov/topic/ForestLandowners/taxResources.html.</p> <ul style="list-style-type: none"> • Link to WIDNR forester that landowner may use for assistance, http://dnr.wi.gov/topic/ForestLandowners/locator/. • Logging contract templates are available here, http://dnr.wi.gov/topic/ForestLandowners/contracts.html. <p>The WIDNR system, as currently implemented, supports land owner independence while ensuring conformance to the FSC standard. WIDNR websites and supporting documents for landowners seek to provide landowners with appropriate tools for forest management (including forestry related handbooks, database tracking for management activities, and cost-share programs) while also providing tools and mechanisms to support environmental and safety protections (such as templates for logging contracts that include site and forest damage terms as well as safety equipment requirements for loggers).</p>
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6. Certification Decision

<p>The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual audit team recommends that the certificate be sustained.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Comments:</p>	

7. Changes in Certification Scope

Any changes in the scope of the certification since the previous audit are highlighted in **yellow** in the tables below.

Name and Contact Information

Organization name	Wisconsin Department of Natural Resources		
Contact person	Mark Heyde		
Address	101 S. Webster St. , FR/4 PO Box 7921 Madison, WI 53707-7921	Telephone	608-267-0565
		Fax	608-266-8576
		e-mail	mark.heyde@wisconsin.gov
		Website	dnr.wi.gov

FSC Sales Information

<input type="checkbox"/> FSC Sales contact information same as above.			
FSC salesperson	Sabina Dhungana		
Address	101 S. Webster St. , FR/4 PO Box 7921 Madison, WI 53707-7921	Telephone	(608) 261-0754
		Fax	(608) 266-8576
		e-mail	sabina.dhungana@wisconsin.gov
		Website	dnr.wi.gov

Scope of Certificate

Certificate Type	<input type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU
	<input checked="" type="checkbox"/> Group	
SLIMF (if applicable)	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input checked="" type="checkbox"/> Group SLIMF certificate	
# Group Members (if applicable)	38,270 as of January 2017	
Number of FMU's in scope of certificate	47,652 MFL parcels as of January 2017	
Geographic location of non-SLIMF FMU(s)	Latitude & Longitude:	
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
Total forest area in scope of certificate which is:		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
privately managed	2,582,274	
state managed		
community managed		
Number of FMUs in scope that are:		
less than 100 ha in area	47,401	100 - 1000 ha in area 251
1000 - 10 000 ha in area		more than 10 000 ha in area
Total forest area in scope of certificate which is included in FMUs that:		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
are less than 100 ha in area	2,582,274 (<1,000 ha/ 10-2,471 ac)	
are between 100 ha and 1000 ha in area		
meet the eligibility criteria as low intensity SLIMF FMUs	2,582,274	
Division of FMUs into manageable units:		
Managed Forest Law order numbers		

FSC Data Request

Production Forests

Timber Forest Products	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	2,582,274
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	170,050 (PR, SW and 2/3 PJ)
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	2,387,127
Silvicultural system(s)	Area under type of management
Even-aged management	
Clearcut (clearcut size range)	452,199 (A, OX, 1/3 PJ)
Shelterwood	619,049 (PW and O)

Other:	102,731 (BW and MR)
Uneven-aged management	
Individual tree selection	538,226 (NH)
Group selection	346,961 (BH, CH and SH)
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	Each land owner has their own harvest intervals based on inventory data.
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	Owners may designate productive forest NTFPs not to exceed 20% of total acreage
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	NTFP FSC claims are not currently made under this certificate.
Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	
Aggregated AAH or NTFB Harvest Rate does not apply to SLIMFs. Harvest intervals are included in the Managed Forest Law Stewardship Plans which use property specific inventory data.	
Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name (Common/ Trade Name)</i>	
Aspen/Popple, <i>Populus grandidentata</i> ; Balsam poplar, <i>Populus balsamifera</i> ; Bottomland hardwoods; Eastern Cottonwood, <i>Populus deltoides</i> ; Swamp white oak, <i>Quercus bicolor</i> ; Silver maple, <i>Acer saccharinum</i> ; American elm, <i>Ulmus americana</i> ; River birch, <i>Betula nigra</i> ; Green ash, <i>Fraxinus pennsylvanica</i> ; White birch, <i>Betula papyrifera</i> ; Northern white cedar, <i>Thuja occidentalis</i> ; Central hardwoods: White oak, <i>Quercus alba</i> ; Bur oak, <i>Quercus macrocarpa</i> ; Black oak, <i>Quercus velutina</i> ; Northern pin oak, <i>Quercus ellipsoidalis</i> ; Black walnut, <i>Juglans nigra</i> ; Butternut, <i>Juglans cinerea</i> ; Shagbark hickory, <i>Carya ovata</i> ; Bitternut hickory, <i>Carya cordiformis</i> ; Black cherry, <i>Prunus serotina</i> ; Red maple, <i>Acer rubrum</i> ; Hackberry, <i>Celtis occidentalis</i> ; Conifers: Balsam fir, <i>Abies balsamea</i> ; Eastern hemlock, <i>Tsuga canadensis</i> ; Miscellaneous conifers: Scotch pine, <i>Pinus sylvestris</i> ; European larch, <i>Larix decidua</i> ; Norway spruce, <i>Picea abies</i> ; Eastern redcedar, <i>Juniperus virginiana</i> ; Blue spruce, <i>Picea pungens</i> ; Miscellaneous deciduous: Norway maple, <i>Acer platanoides</i> ; Boxelder, <i>Acer negundo</i> ; Black locust, <i>Robinia pseudoacacia</i> ; Honey locust, <i>Gleditsia triacanthos</i> ; Eastern Hophornbeam, Ironwood, <i>Ostrya virginiana</i> ; Muscledwood, Bluebeech, <i>Carpinus caroliniana</i> ; Northern hardwoods: Sugar maple, <i>Acer saccharum</i> ; Yellow birch, <i>Betula alleghaniensis</i> ; White ash, <i>Fraxinus americana</i> ; American beech, <i>Fagus grandifolia</i> ; American basswood, <i>Tilia americana</i> ; Northern red oak, <i>Quercus rubra</i> ; Red Pine, <i>Pinus resinosa</i> ; Jack Pine, <i>Pinus banksiana</i> ; Eastern white pine, <i>Pinus strobus</i> ; Black spruce, <i>Picea mariana</i> ; Tamarack, <i>Larix laricina</i> ; Black ash, <i>Fraxinus nigra</i> ; White spruce, <i>Picea glauca</i>	

FSC Product Classification

Timber products			
	Product Level 1	Product Level 2	Species

<input checked="" type="checkbox"/>	W1 Rough Wood	W1.1 Roundwood (logs)	Aspen/Popple, Balsam poplar, Eastern Cottonwood, Swamp white oak, Silver maple, American elm, River birch, Green ash, White birch, Northern white cedar, White oak, Bur oak Black oak, Northern pin oak, Black walnut, Butternut, Shagbark hickory, Bitternut hickory, Black cherry, Red maple, Hackberry, Balsam fir, Eastern hemlock, Scotch pine, European larch, Norway spruce, Eastern redcedar, Blue spruce, Norway maple, Boxelder, Black locust, Honey locust, Eastern Hophornbeam, Ironwood Musclewood, Bluebeech, Sugar maple, Yellow birch, White ash, American beech, American basswood, Northern red oak, Red Pine Jack Pine, Eastern white pine, Black spruce Tamarack, Black ash, White spruce
<input checked="" type="checkbox"/>		W1.2 Fuel Wood	Aspen/Popple, Balsam poplar, Eastern Cottonwood, Swamp white oak, Silver maple, American elm, River birch, Green ash, White birch, Northern white cedar, White oak, Bur oak Black oak, Northern pin oak, Black walnut, Butternut, Shagbark hickory, Bitternut hickory, Black cherry, Red maple, Hackberry, Balsam fir, Eastern hemlock, Scotch pine, European larch, Norway spruce, Eastern redcedar, Blue spruce, Norway maple, Boxelder, Black locust, Honey locust, Eastern Hophornbeam, Ironwood Musclewood, Bluebeech, Sugar maple, Yellow birch, White ash, American beech, American basswood, Northern red oak, Red Pine Jack Pine, Eastern white pine, Black spruce Tamarack, Black ash, White spruce
<input type="checkbox"/>		W1.3 Twigs	
<input type="checkbox"/>	W2 Wood charcoal		
<input checked="" type="checkbox"/>	W3 Wood in chips or particles	W3.1 Wood chips	Aspen/Popple, Balsam poplar, Eastern Cottonwood, Swamp white oak, Silver maple, American elm, River birch, Green ash, White birch, Northern white cedar, White oak, Bur oak Black oak, Northern pin oak, Black walnut, Butternut, Shagbark hickory, Bitternut hickory, Black cherry, Red maple, Hackberry, Balsam fir, Eastern hemlock, Scotch pine, European larch, Norway spruce, Eastern redcedar, Blue spruce, Norway maple, Boxelder, Black locust, Honey locust, Eastern Hophornbeam, Ironwood Musclewood, Bluebeech, Sugar maple, Yellow birch, White ash, American beech, American basswood, Northern red oak, Red Pine Jack Pine, Eastern white pine, Black spruce Tamarack, Black ash, White spruce
<input type="checkbox"/>	Other*	Please List:	
Note: If your operation produces processed wood products such as wood pellets, planks, beams, poles etc. please discuss with SCS staff as you may need a separate CoC certificate.			

Non-Timber Forest Products			
	Product Level 1	Product Level 2	Product Level 3 and Species
<input type="checkbox"/>	N6 Plants and parts of plants	N6.1 Flowers	
<input type="checkbox"/>		N6.2 Grasses, ferns, mosses and lichens	

<input checked="" type="checkbox"/>		N6.3 Whole trees or plants	<input checked="" type="checkbox"/> N6.3.1 Christmas trees
<input type="checkbox"/>		N6.4 Pine cones	

Conservation Areas

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives:	HCVF are not designated on private lands, however animals, plants, and habitats of significance are identified through the Natural Heritage Inventory database which includes HCV data. This information is used to craft the stewardship plan and design harvesting operations that mitigate disruptions to these elements.
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High Conservation Value Forest / Areas

High Conservation Values present and respective areas: Units: ha or ac

Code	HCV Type	Description & Location	Area
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		
HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.		
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		

HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
Total Area of forest classified as 'High Conservation Value Forest / Area'			

Areas Outside of the Scope of Certification (Partial Certification and Excision)

<input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.		
<input type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.		
<input checked="" type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
Explanation for exclusion of FMUs and/or excision:	Forest owners establish and manage small (generally less than 1 acre ea.) wildlife food plots from time to time. Although DNR recommends that landowners do not plant GMO corn and soybeans (e.g. Roundup Ready®) as wildlife food sources this has been very difficult to track and control. Therefore based on the frequency of food plots found during the 2013 audit the following formula was developed to estimate the total number and area of food plots in the FMUs: number of MFL orders X .082 x 1 ac = number of acres excised; the calculation for 2017 is: 47,652 x .082 x 1 ac = 3907.46 ac	
Control measures to prevent mixing of certified and non-certified product (C8.3):	Food plots are not a source of forest products. There is no risk of mixing certified and non-certified products.	
Description of FMUs excluded from or forested area excised from the scope of certification:		
Name of FMU or Stand	Location (city, state, country)	Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)
Various	Not mapped unless at least 2 ac.	3907

8. Annual Data Update

8.1 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
# of male workers 305 permanent; 417 LTE	# of female workers 88 permanent; 115 LTE	
Number of accidents in forest work since last audit:	Serious: 1 lost time	Fatal: 0

8.2 Annual Summary of Pesticide and Other Chemical Use

<input type="checkbox"/> FME does not use pesticides.				
Commercial name of pesticide / herbicide	Active ingredient	Quantity applied annually (kg or	Size of area treated during previous year	Reason for use

		lbs)		
Roundup Clean Field 41% Pronto Big -n- Tuf	Glyphosate	669 lbs	142 acres	Release regeneration; invasive plant control; site preparation
Escort	Metsulfuron Methyl	3 lbs	20 acres	Invasive plant control
Oust	Sulfometuron Methyl		48 acres	Release regeneration; invasive plant control
Element 4 Garlon Bayer Brush Killer Concentrate Triclopyr	Triclopyr	12 lbs	475 acres	Release regeneration; invasive plant control; site preparation
Crossbow 2,4-D	2,4-D	40 lbs	28 acres	Invasive plant control
Sporax	Borax (Borax formulations approved for HRD prevention are not on the FSC HHP list.		934 acres	Heterobasidion Root Disease prevention; cut stump treatment
Tordon	Picloram	5 lbs	46 acres	Invasive plant control
Clopyralid	Transline		19 acres	Broadleaf weed control
Slay	Ammonium Salt of imazethapyr	0.38 lbs	2 acres	Invasive plant control


SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – List of FMUs Selected For Evaluation

- FME consists of a single FMU
 FME consists of multiple FMUs or is a Group

SCS staff establishes the design and level of sampling prior to each group or multiple FMU evaluation according to FSC-STD-20-007. A list of the FMUs sampled and the rationale behind their selection is listed below.

- The RMU for this audit is set at the office level for this group certificate (72 counties vs. ~100 offices). All individual properties in the group qualify as a SLIMF and natural/ semi-natural management. Six offices with 9 properties per offices were selected for the 2017 audit. Fifteen sites were randomly selected, the remainder were selected based on harvest methods, forest cover types, known implementation (environmental) issues, landowner/group member issues, and other risk factors.

FMU Name	FMU Size Category: - SLIMF - non-SLIMF - Large > 10,000 ha	Forest Type: - Plantation - Natural Forest	Rationale for Selection: - Random Sample - Stakeholder issue - Ease of access - Other – please describe
These items are described in table inserted below:  Microsoft Excel Worksheet			

Appendix 2 – List of Stakeholders Consulted

List of FME Staff Consulted

Name	Title	Contact Information	Consultation method
Mark Heyde	Sustainable Forestry Certification Coordinator	608-220-9780	Open, Field, Close
Jake Elder	Richland Center, Forestry Team Leader	608-604-5848	Open, Field
Joe Schmaedick	Forester	Joseph.schmaedick@wi.gov	Field
Juli Van Cleve	Forester	julivancleve@wi.gov	Field
Todd Kenefick	Forester	Todd.kenefick@wi.gov	Field
Sadie Brown	Forester	608-225-3408	Open, Field
Nick Morehouse	Forester	608-235-5685	Field
Mike Finlay	Forestry Team Leader	608-434-2146	Open, Field, Close
Gerry Crow	Forest Tax Field Manager; MFL Group Certificate Manager	Gerald.Crow@wisconsin.gov	Open, Field, Close
Fred Souba	Division of Forestry, Chief State Forester	Fred.souba@wisconsin.gov	Open, Field, Close
Aaron Young	Area Forestry Leader	608-558-5844	Field
Cody Didier	Forester	608-574-6878	Field
Brad Hutnik	Silviculturist	608-574-5642	Field, Close
Scott Lancaster	Forester	608-332-7081	Field
Juli Van Cleave	Forester	608-341-0281	Field
R.J. Wickham	Tax Law Section Chief	920-369-6248	Field
Ryan Conner	Tax Law Administrative Spec	Ryan.conner@wisconsin.gov	Field
Chase O'Brien	Tax Law Administrative Spec	Chase.obrien@wisconsin.gov	Field
Jason Sable	Forester	Jason.sable@wisconsin.gov	Field
Jeff Simon	Tax Law Operations Spec	jeffreyS.simon@wisconsin.gov	Field
Amanda Swearingen	Tax Law Policy Spec	Amanda.swearingen@wisconsin.gov	Field
Sarah Zimmerman	Tax Law Administrative Spec	Sarah.zimmerman@wisconsin.gov	Field

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Patrick Guyse	Nelson Hardwoods	608-547-7816	Field interview	N
Brian Nelson	Nelson Hardwoods	608-778-1403	Field interview	N
Peter Kinsman	Forester/Verso	608-344-8988	Field interview	N
Yvonne Zubaty (12-032-2002)	Group member/ Landowner	608-326-8456	Field interview	N

Charles Ray (53-003-2007)	Group member/ Landowner	608-235-2313	Field interview	N
Jennie Baker	Office Coordinator, Forest Industry Safety and Training Alliance, Inc. (FISTA)	jennie.baker@fistausa.org	Email	N
Duane Statz	Group member/ Landowner	MFL Order# 57-026-1999	Phone	N
Gary Moseman (57-005-2014)	Group member/ Landowner	608-370-4844	Field interview	Y
Gary Palmer	Gary Palmer Trucking	608-524-0329	Field interview	N
Bob Wickman (57-095-2004)	Group member/ Landowner	608-588-4973	Field interview	Y
TD Haukerid	Consulting Forester	608-332-1174	Field interview	Y
John McKenna (57-025-1998)	Group member/ Landowner	MFL Order # 57-025-1998	Field interview	Y
Barry Luetscher (57-050-2005)	Group member/ Landowner	608-544-2520	Field interview	Y
Edie Ehlert (12-053-2004)	Group member/ Landowner	608-734-3223	Field interview	Y
Aaron Wunnicke	Consulting Forester	608-647-0028	Field interview	Y
Tom Brown	Consulting Forester	563-380-1199	Field interview	Y
Richard Penkaliski	Logging broker (prepared cutting notice, marked sale, closed out site)	608-606-9586	Field interview	Y
Gary Moseman (57-005-2014)	Group member/ Landowner	608-370-4844	Field interview	Y
Gary Palmer	Gary Palmer Trucking	608-524-0329	Field interview	N
Bob Wickman (57-095-2004)	Group member/ Landowner	608-588-4973	Field interview	Y
Nan Fey	Group member/ Landowner	MFL Order #25-009-2005	Field interview	N
Bill Buckley	Forestry Consultant		Field interview	N
Aaron Wunnicke	Forestry Consultant		Field interview	N
Jeannie Anderson	Group member/ Landowner	MFL Order #25-011-2016	Field interview	N
James Jakubowski	Group member/ Landowner	MFL Order #11-015-2014	Field interview	N
Bonnie and Thomas Wayne	Group member/ Landowner	MFL Order #11-017-2014	Field interview	N
Dean Buchect	Logger		Field interview	N
Melvin Jennings	Group member/ Landowner	MFL Order #11-018-1996	Field interview	N
Dale Cross	Group member/ Landowner	MFL Order #11-034-2014	Field interview	N

Appendix 3 – Additional Audit Techniques Employed

None.

Additional techniques employed (*describe*):

Appendix 4 – Pesticide Derogations

There are no active pesticide derogations for this FME.

Appendix 5 – Detailed Observations

Criteria required by FSC at every surveillance audit (<i>check all situations that apply</i>)	<input type="checkbox"/> NA – all FMUs are exempt from these requirements. <input type="checkbox"/> Plantations > 10,000 ha (24,710 ac): 2.3, 4.2, 4.4, 6.7, 6.9, 10.6, 10.7, and 10.8 <input type="checkbox"/> Natural forests > 50,000 ha (123,553 ac) ('low intensity' SLIMFs exempt): 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 8.2, and 9.4 <input checked="" type="checkbox"/> FMUs containing High Conservation Values ('small forest' SLIMFs exempt): 6.2, 6.3, 6.9 and 9.4
Documents and records reviewed for FMUs/ sites sampled	<input checked="" type="checkbox"/> All applicable documents and records as required in section 7 of audit plan were reviewed; or <input type="checkbox"/> The following documents and records as required in section 7 of the audit plan were NOT reviewed (<i>provide explanation</i>):

Evaluation Year	FSC P&C Reviewed
Evaluation Year	FSC P&C Reviewed
2013	All – (Re)certification Evaluation
2014	2.1, 2.2, 4.2, 5.2, 6.2, 6.3, 6.5, 6.7, 6.8, 6.9, 7.2, 7.3, 8.3 (COC indicators for FMEs).
2015	2.3, P3, 4.1, 4.2, 4.3, 4.4, 4.5, 5.2, 5.3, 5.4, 5.5, 6.10, 7.4, and 8.5.
2016	5.6, 6.1, 6.4, 6.6, 7.1, 8.1, 8.4, and P9.
2017	P1, 5.1, 6.3.h; FF 7.1.a; 7.3.a; 8.2, 8.4.b; FSC-STD-30-005; and SCS COC 2.1

C= Conformance with Criterion or Indicator
 NC= Nonconformance with Criterion or Indicator
 NA = Not Applicable
 NE = Not Evaluated

FSC Forest Management Standard (v1.0)—United States

REQUIREMENT	C/NC	COMMENT/CAR
Principle #1: Compliance with Laws and FSC Principles Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC		

Principles and Criteria.		
C1.1 Forest management shall respect all national and local laws and administrative requirements.	C	
<p>1.1.a. Forest management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements (e.g., regulations). Violations, outstanding complaints or investigations are provided to the Certifying Body (CB) during the annual audit.</p>	C	<p>Verified conformance at all MFL Properties inspected during the 2017 audit.</p> <p>The 2016 audit found that during interviews with DNR foresters that work with MFL group members, there is much confusion on what actions staff can take when group members' cutting notices are missing information or otherwise incomplete since DNR no longer has to approve or disapprove them when the review box remains unchecked. FME has identified this issue during the 2016 internal audit of the MFL program, which justifies the grading as an OBS since the FME is already working on resolving this issue (See staff observations pg. 5 & 6 of the 2016 Internal MFL Audit Report).</p> <p>Changes to the Forest Tax Law Cutting Notice and Cutting Notice Process were officially announced to DNR Foresters, Cooperating Foresters, and other external partners on July 13 & 14, 2015. Following implementation of Act 358, additional guidance on the Cutting Notice process along with other MFL changes was communicated to the same groups on April 15, 2016. Following initial updating of Chapter 20 in the DNR Forest Tax Law Handbook, a communication was sent on October 18, 2016 to the same groups announcing the Chapter 20 update which contained the changes to the Cutting Notice process.</p> <p>The current version of the DNR Forest Tax Law Handbook publicly available includes the updated cutting notice process developed prior to Act 358. An updated Draft Forest Tax Law Handbook is currently following the DNR process for public review and comment, and will be finalized in the near future following any final edits resulting from public review.</p> <p>DNR Foresters receive annual MFL update training each year to address current program topics and clarify process and procedures. At the time of the 2016 internal MFL audit, Act 358 had not been passed and final guidance on cutting notice process had not been completed. Following passage of Act</p>

	<p>358 in April, 2016, annual MFL update sessions were held in October in five separate geographic locations throughout the state with a total of 190 DNR staff and 198 non-DNR Staff (Certified Plan Writers, and other forestry professionals) attending. The 2016 update sessions focused on the changes to the MFL program instituted under Act 358. One of the topics included in the update sessions was a discussion of Cutting Notices with guidance on addressing missing and incomplete information when DNR has no approval authority. The attached Unit 1 PowerPoint presentation (slides 6-17) from the update sessions provides new information on procedures for DNR Foresters to follow regarding this issue.</p> <p>Beginning July 1, 2017, WDNR is implement the new Tax Law Section model developed during the DNR Alignment process (see map). The new Tax Law Section utilizes four geographic teams to administer MFL and provide customer service across the state. The new section includes 34 Tax Law Field Specialists and 5 Tax Law Administration Specialists along with the 4 Team Leaders that will focus exclusively on the MFL & FCL tax law programs, providing increased knowledge and program proficiency through specialization. The new section also includes 5 Program Specialists and a Section Chief that will provide the foundational program and policy guidance.</p> <p>Evidence reviewed:</p> <ul style="list-style-type: none"> • WI DNR Cutting Notice and Report for each MFL property inspected • MFL Stewardship Plan for each property inspected • Timber sale contracts • WI DNR Forest Tax Law Handbook, http://dnr.wi.gov/topic/ForestManagement/documents/24505.pdf • WI DNR Silviculture Handbook, http://dnr.wi.gov/topic/ForestManagement/silviculture.html • WI DNR Forest Management Guidelines • WI DNR Private Forestry Handbook (24705), http://dnr.wi.gov/topic/ForestManagement/documents/24705.pdf • Public Forest Lands Handbook, 2460.5,
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		http://dnr.wi.gov/topic/ForestManagement/documents/24605.pdf This information is also given in closure of OBS 2016.1.
1.1.b. To facilitate legal compliance, the forest owner or manager ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.	C	DNR addresses this requirement through training opportunities and adherence to procedures described in handbooks. Training includes: <ul style="list-style-type: none"> • Cooperating Foresters are required to complete 10 hours of training per year. • Through FISTA, DNR provides many training sessions for loggers. • Certified Plan Writers, DNR Foresters, supervisors and other DNR staff who administer the MFL program must attend the annual MFL Recertification training.
C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	C	
1.2.a. The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.	NA	All group members qualify as a SLIMF.
FF 1.2.a: Low risk of negative social or environmental impact.	C	Verified low risk through a sample review of DNR’s correspondences with landowner including yield tax payment evidence.
C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	C	
1.3.a. Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.	NA	All group members qualify as a SLIMF.
FF Indicator 1.3.a: Low risk of negative social or environmental impact	C	Determined low risk of negative social or environmental impact due to U.S. Federal Law requirements covering most of Criterion 1.3
C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	C	
1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.	C	Confirmed WIDNR is aware of requirement. No conflict between laws, regulations, and the FSC P&C were identified at any of the properties audited.
C1.5. Forest management areas should be	C	

protected from illegal harvesting, settlement and other unauthorized activities.		
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the Forest Management Unit (FMU).	C	WI DNR helps facilitate boundary marking and provides law enforcement resources where needed. DNR has wardens, unique category of enforcement staff called Conservation Officers (WCO), who are able to issue citations.
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	Illegal or unauthorized activities were not observed during 2017 audit. Confirmed adequate boundary marking at all properties reviewed. Interviews with landowners indicated that illegal/unauthorized activities were not an issue of significant concern.
C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.		
1.6.a. 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.	C	Forest Tax Law Handbook documents commitment to the FSC Principles and Criteria (Chapter 21-1).
1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.	C	Partial certification is covered in the Forest Tax Law Handbook (Chapter 21)
1.6.c. The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.	NA	All group members qualify as a SLIMF.
FF Indicator 1.6.c The forest owner, manager or group manager notifies the Certifying Body of significant changes in ownership, the certified land base and/or significant changes in management planning prior to the next scheduled annual audit, or within one year of such change, whichever comes first.	C	
Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their		

lands, territories, and resources shall be recognized and respected.		
Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
Principle #5: Forest management operations shall encourage the efficient use of the forest’s multiple products and services to ensure economic viability and a wide range of environmental and social benefits.		
C5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.	C	
5.1.a. The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.	C	<p>Requirement met primarily through core strategy of MFL that encourages long-term management (i.e., 25-50 year contracts) by offering considerable reduced property tax rates.</p> <p>Confirmed a reasonable amount of continued investment such as cost sharing for tree planting and invasive plant control through Wisconsin Forest landowner Grant Program http://dnr.wi.gov/topic/forestlandowners/financial.html) on properties inspected in 2017.</p> <p>In addition DNR and MFL program foresters and other plan writers are able to provide assistance with the following federal cost sharing programs (http://dnr.wi.gov/topic/forestlandowners/financial.html) : Conservation Reserve Program (CRP); Environmental Quality Incentives Program (EQIP); Conservation Stewardship Program (CSP); CSP for Forestland Managers; and CSP for Wildlife.</p>
5.1.b. Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.	C	<p>Confirmed harvest sites visited used sound silviculture that was not based on short-term financial factors. In selection harvests, high quality trees capable of future growth were systematically retained for future harvests. Example of 12-033-2013, Zubaty property, was rejected due to high grading. Logging contractor, contracting company forester, and land owner all confirmed WIDNR requiring additional TSI. All parties are aware of relevant MFL program requirements involved, next steps, and objectives of additional required work prescribed as a result of the post-harvest review.</p> <p>The WIDNR Division of Forestry (DoF) currently has 20% vacancy rate and within the DoF MFL currently has 9/45 positions open. However, the Division is</p>

		currently undergoing restructuring as a result of a long-term realignment process and anticipates hiring to fill many of these positions within the next year.
5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.	NE	
5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	NE	
5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	NE	
5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.	NE	
5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.		
Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.		
6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.	NE	
6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	NE	
6.3. Ecological functions and values shall be		

<p>maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p>		
<p>6.3.a. Landscape-scale indicators</p>	<p>NE</p>	
<p>6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented successional stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.</p>	<p>NE</p>	
<p>6.3.a.2 When a rare ecological community is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, conservation zones and/or protected areas are established where warranted.</p>	<p>NE</p>	
<p>6.3.a.3 When they are present, management maintains the area, structure, composition, and processes of all Type 1 and Type 2 old growth. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p>	<p>NE</p>	

<p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected. 		
<p>6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	<p>NE</p>	
<p>6.3.c Management maintains, enhances and/or</p>		

<p>restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</p> <ul style="list-style-type: none"> a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent aquatic habitats; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem. 		
<p>Stand-scale Indicators 6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	NE	
<p>6.3.e When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. Native species suited to the site are normally selected for regeneration.</p>	NE	
<p>6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:</p> <ul style="list-style-type: none"> a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and b) vertical and horizontal complexity. <p>Trees selected for retention are generally representative of the dominant species found on the site.</p>	NE	
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific</p>	NE	

<p>Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>		
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings. 	NE	
<p>6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and</p>	C	<p>Invasive species are assessed during Management Plan writing and prior to a timber sale. Interviews</p>

<p>implements a strategy to prevent or control invasive species, including:</p> <ol style="list-style-type: none"> 5. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 6. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 7. eradication or control of established invasive populations when feasible: and, 8. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species. 		<p>with foresters indicated a high level of awareness about invasive plant problems.</p> <p>All Cutting Notices and FMPs reviewed in 2017 included an accounting of invasive plants. On a significant number of the properties some herbicide treatment of invasives was being conducted.</p> <p>Additional documents reviewed: <i>FinalVers_Responses_to_2016_External_Audit_Observations.docx; CISMA_MAP 2016.pdf; Restoration Contractors 2017.pdf</i></p> <p>See closure of OBS 2016.2 for additional detail.</p>
<p>6.3.i. In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>	C	<p>Occurs by following Silviculture Handbook and DNR Forest Management Guidelines. Observed good conformance with fuels management practices.</p>
<p>6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>	NE	
<p>6.5 Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</p>	C	
<p>6.5.a The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.</p>	NE	
<p>6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.</p>	NE	
<p>6.5.c Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly</p>	NE	

<p>increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed:</p> <ul style="list-style-type: none"> • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. • Low impact equipment and technologies is used where appropriate. 		
<p>6.5.d The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife 	<p>C</p>	<p>See OBS 2017.1.</p>

<p>habitat and migration corridors are minimized;</p> <ul style="list-style-type: none"> • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated. 		
<p>6.5.e.1 In consultation with appropriate expertise, the forest owner or manager implements written <i>Streamside Management Zone (SMZ) buffer</i> management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>	NE	
<p>6.5.e.2 Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these</p>	NE	

requirements, based on the input of an independent expert in aquatic ecology or closely related field.		
6.5.f Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of <i>aquatic habitat</i> . Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.	NE	
6.5.g Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.	NE	
6.5.h Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.	NE	
6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.		
6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	NE	
6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use	NE	

<p>of genetically modified organisms shall be prohibited.</p>		
<p>6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</p>	<p>NE</p>	
<p>Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</p>		
<p>7.1. The management plan and supporting documents shall provide: a. Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands. b. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species. b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership. i) Description and justification of harvesting techniques and equipment to be used.</p>	<p>NA</p>	<p>MFL only consists of SLIMF group members; all non-applicable indicators of this Criterion have been removed.</p>
<p>FF Indicator 7.1.a A written management plan exists for the property or properties for which certification is being sought. The management plan includes the following components:</p>	<p>C</p>	<p>MFL group member files contain several documents that comprise the FMP and address the items of this indicator, as verified at all field offices, including: Stewardship Forestry Plan (maps, objectives,</p>

<p>i. Management objectives (ecological, silvicultural, social, and economic) and duration of the plan.</p> <p>ii. Quantitative and qualitative description of the forest resources to be managed, including at minimum stand-level descriptions of the land cover, including species and size/age class and referencing inventory information.</p> <p>iii. Description of silvicultural and/or other management system, prescriptions, rationale, and typical harvest systems (if applicable) that will be used.</p> <p>iv. Description of harvest limits (consistent with Criterion 5.6) and species selection. Also, description of the documentation considered from the options listed in Criterion 5.6 if the FMU does not have a calculated annual harvest rate.</p> <p>v. Description of environmental assessment and safeguards based on the assessment, including approaches to: (1) pest and weed management, (2) fire management, and (3) protection of riparian management zones; (4) protection of representative samples of existing ecosystems (see Criterion 6.4) and management of High Conservation Value Forests (see Principle 9).</p> <p>vi. Description of location and protection of rare, threatened, and endangered species and plant community types.</p> <p>vii. Description of procedures to monitor the forest, including forest growth and dynamics, and other components as outlined in Principle 8.</p> <p>viii. Maps represent property boundaries, use rights, land cover types, significant hydrologic features, roads, adjoining land use, and protected areas in a manner that clearly relates to the forest description and management prescriptions.</p>		<p>quantitative and qualitative descriptions, silvicultural and other management systems, environmental assessment and safeguards, RTE species/ communities), Land exams, Cutting Notices & Reports, letters of communication from MFL staff, NRCS data (optional; e.g. soil maps), NHI database results, DNR archaeologist in conjunction with Wisconsin Historical Society, transfer order (if applicable), and deed & tax records.</p> <p>Stand descriptions include a qualitative and quantitative analysis of stand level data and information, including steps to achieve harvest, growth, and regeneration.</p> <p>Harvest limits can be monitored the state-level and county-level using Wisconsin DNR and US Forest Service data for the state.</p> <p>While the chance of RSAs or HCVFs to occur on MFL properties is low to none, the person in charge of the RSA/HCVF assessment processes retired. Properties reviewed during the 2016 audit did not have RSAs or HCVFs as described in FSC-US guidance. However, FME should consider summarizing the results of these assessments in the overarching group management documents.</p> <p>See closure of OBS 2016.3 for additional detail.</p>
<p>FF Indicator 7.1.b Actions undertaken on the FMU are consistent with the management plan and help to achieve the stated goals and objectives of the plan.</p>	<p>C</p>	<p>All actions observed on group member properties in 2017 were consistent with descriptions in the FMP. Where changes were necessary due to stand conditions, addenda to the cutting notice or management plan were created.</p>

		<p>The WIDNR system of DNR pre- and post-harvest checks is currently the most effective means of ensuring this indicator is met. For example, the Zubaty property visited in the 2017 audit where post-harvest check by WIDNR forester discovered inadequate implementation in the field. Subsequent actions were required of landowner, logger, and forester to remain consistent with forest management goals and silvicultural objectives.</p>
<p>7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.</p>		
<p>7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.</p>	<p>NE</p>	
<p>7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</p>		
<p>7.3.a Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.</p>	<p>C</p>	<p>2016: MFL program staff reported conflicting information on the management plan structure and what documents take precedence over others. For example, senior MFL program staff stated that information entered into WisFRS should take precedence over what is described in group member management plans since WisFRS is most likely to have been more recently updated with the most current mandatory practices. As confirmed through interviews, there is also not agreement among MFL program staff on how to deal with management practices that may be necessary to maintain planned stand trajectories, but are listed as non-mandatory. DNR staff presented</p>


	<p>conflicting information on when NHI information must be updated for group members in WisFRS. Some staff stated that NHI must be consulted when a new mandatory practice is being planned and others said that it must be updated only when the management plan is updated during the re-enrollment phase. According to MFL procedures, NHI information must be updated during both of these phases. Further trainings on WisFRS are already planned.</p> <p>2017: On Cutting Notices where DNR has no approval authority, DNR Foresters are required to verify that the person submitting the CN is on the DNR CN Registration List, and are additionally required to review the CN cutting prescription for agreement with the approved Management Plan. If either or both don't agree, then approval authority reverts to the DNR, upon which the DNR Forester must review the CN and request changes be made to the CN to agree with the landowner's Management Plan for approval prior to commencement of harvesting. Detailed procedural steps and guidance are found in the updated 2017 version of the Forest Tax Law Handbook (currently under public review prior to general release) in the Harvesting on MFL section (see inserted document), which incorporates guidance prepared after passage of Act 358. If a CN meets the requirements for submission with no DNR review or approval requested, and either a complaint is received or the DNR Forester inspects during active- or post-harvest and finds that harvesting was inconsistent with the management plan or the CN prescription, then</p>
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		<p>the standard enforcement procedure will be initiated with the landowner. If a Cooperating Forester is part of the process, then a separate Compliance Action could be initiated if the Cooperator was found to be at fault.</p> <p>If the landowner disagrees with DNR’s analysis of the issue and subsequent decision, then the landowner can request to initiate the Dispute Resolution Process (DRP), which was developed and first available in late 2016. The Dispute Resolution Process is a voluntary process that can be used when disagreements involving decisions made by DNR on MFL or FCL-enrolled lands cannot readily be resolved between DNR Foresters and private sector forestry professionals, loggers, and landowners. The DRP was designed to be 1) independent, objective, & nonbiased; 2) completed on a timely basis, and 3) facilitate ownership and trust. The DRP offers an option to landowners to resolve disputes using an impartial external mediation process with a private-sector firm serving as the Administrator and utilizing professional foresters as mediators and experts. The DRP is described in Chapter 31 of the 2017 draft version of the Forest Tax Law Handbook:</p> <p>See CAR 2014.10 closure for additional detail.</p>
<p>7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</p>	<p>NE</p>	
<p>Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</p> <p><i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		

<p>8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</p>	<p>NE</p>	
<p>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</p>	<p>C</p>	
<p>8.2.a.1. For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.</p>	<p>C</p>	<p>Topics a-f are monitored on MFL properties. Evidence:</p> <ul style="list-style-type: none"> • Interviews with MFL Foresters and review of MFL property records in selected County Offices. • Forest Tax Handbook, Chapter 50 (Section 2450.5); Chapter 21-11 • Public Lands Handbook Chapter 110-10 (Section 2460.5) • NR 46, Wis. Admin. Code • Ch. 77, Wis. Stats.
<p>8.2.a.2. Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p>	<p>C</p>	<p>Monitoring of unanticipated loss occurs through:</p> <ul style="list-style-type: none"> • WI DNR Forest Health Surveys (aerial surveys) • Landowner identification resulting in visit from MFL Forester and/or WI DNR 6 forest health specialists covering the state. Serve as resources and available to general public, industry, and cooperating foresters. • Forest inventory prior to and following harvest activities. <p>Unanticipated removal (i.e., timber theft) is uncommon and thus only monitored passively.</p>
<p>8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.</p>	<p>C</p>	
<p>8.2.c. The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p>	<p>C</p>	<p>Items 1-5 are monitored through the NHI data system, periodic timber cruises at time of writing management plan or pre/post-harvest, and various</p>

<ol style="list-style-type: none"> 1) Rare, threatened and endangered species and/or their <i>habitats</i>; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4). 		<p>WIDNR flora and fauna research across the State.</p>
<p>8.2.d.1. Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p>	<p>C</p>	<p>Such monitoring occurs and is described in Forest Tax Handbook, Chapter 50 (Section 2450.5); Chapter 21-11.</p>
<p>8.2.d.2. A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.</p>	<p>C</p>	<p>Such monitoring occurs and is described in Forest Tax Handbook, Chapter 50 (Section 2450.5); Chapter 21-11.</p>
<p>8.2.d.3. The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).</p>	<p>NA</p>	<p>See Family Forest applicability note and WI DNR determination of NA.</p>
<p>8.2.d.4. Stakeholder responses to management activities are monitored and recorded as necessary.</p>	<p>NA</p>	<p>See Family Forest applicability note and WI DNR determination of NA.</p>
<p>8.2.d.5. Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).</p>	<p>C</p>	<p>See Principle 3.</p>
<p>8.2.e. The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.</p>	<p>C</p>	<p>Timber management activities on non-industrial properties are structured and monitored to ensure revenue is sufficient to pay for the logging costs and the consulting forester. Since harvests typically only occur every 15-20 years there is little opportunity to assess productivity and efficiency of management on any regular basis. Land owners interviewed indicated that they use simple cost benefit calculations to determine efficiency of their overall management choices (i.e., enroll in MFL and manage for timber products). Such calculation include revenue from timber sales plus the tax savings compared with any costs of management and TSI work.</p>

<p>8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</p>		
<p>8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.</p>	C	
<p>8.4.a The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.</p>	NE	
<p>8.4.b Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.</p>	C	<p>2016: Interviews with field foresters and reviews of MFL property documents confirmed that monitoring is occurring and necessary revisions to plans are systematically implemented. In 2016, plans were updated after cutting notices and reports were finalized. Where stand conditions differed from descriptions provided in initial recon information, pre-harvest inventory information was used to justify the harvest prescriptions recorded on the cutting notice.</p> <p>2017: Forest regeneration in Wisconsin faces numerous challenges, among them herbivory activity by both white-tail deer and elk in different geographic areas of the state. One approach put into place by WIDNR in 2016 is the <i>Natural Regeneration Ad Hoc Team</i>. The Division of Forestry created a Natural Regeneration Ad Hoc Team to review and recommend natural regeneration monitoring protocols in an effort to provide a more cohesive statewide strategy for achieving successful natural regeneration. Forest regeneration was identified as an implementation issue in the Division’s prior Strategic Direction. Forest regeneration monitoring was also identified as an opportunity for improvement in forest certification audits on</p>

	<p>state and private lands. The team makeup includes foresters from different management interests (DNR, forest industry, county forest, private lands, and consulting foresters). Their charge is to review current DNR <u>Silviculture Handbook</u> guidance on regeneration monitoring methods and standards, standardize the format of regeneration for differing cover types (especially where lacking), develop efficient and effective monitoring protocols, collect and manage reforestation monitoring data, and define forester responsibilities in monitoring forest regeneration. The group is scheduled to have its final products and recommendations available by the end of 2017.</p> <p>One tool that has been recently developed in conjunction with the Nat’l Regen Ad Hoc Team is a Forest Regeneration Matrix which can be applied to help assess levels of herbivory. The final version will be included in the DNR <u>Silviculture Handbook</u>, and will be available to all DNR Foresters as well private sector foresters, land and resource managers, landowners, and others interested in regeneration assessment. The draft version is shown below.</p> <div style="text-align: center;">  <p>ForestRegenMetric_ versionApril2017.doc</p> </div> <p>Another area where regeneration concerns are placed into the decision-making process is through participation in the County Deer Advisory Councils (CDAC). Each county in Wisconsin has a CDAC with the charge to provide input and recommendations to DNR on deer management within their county. Councils comprised of public citizens work with local DNR staff to schedule meetings, provide community outreach and an opportunity for public input,</p>
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		<p>review population data and deer impacts on forests and agriculture, develop 3-year recommendations on county population objectives and create annual antlerless harvest quotas. The importance of sustainable forests and challenges with regeneration are regularly included in CDAC discussions.</p> <p>See OBS 2016.5 closure for additional detail.</p>
<p>8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</p>	<p>NE</p>	
<p>Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</p> <p>High Conservation Value Forests are those that possess one or more of the following attributes:</p> <ul style="list-style-type: none"> a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance b) Forest areas that are in or contain rare, threatened or endangered ecosystems c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control) d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities). 		

Appendix 6 – Tracking, Tracing and Identification of Certified Products

SCS FSC Chain of Custody Indicators for Forest Management Enterprises, Version 6-0

Chain of Custody indicators were not evaluated during this annual audit.

REQUIREMENT	C/ NC	COMMENT/CAR
<p>1. Quality Management</p>		
<p>2. Product Control, Sales and Delivery</p>		

<p>2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).</p>	<p>C</p>	<p>See OBS 2016.7.</p>
<p>2.2 The FME shall maintain records of quantities/volumes of FSC-certified product(s).</p>	<p>NE</p>	
<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <ul style="list-style-type: none"> a) name and contact details of the organization; b) name and address of the customer; c) date when the document was issued; d) description of the product; e) quantity of the products sold; f) the organization’s FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code; g) clear indication of the FSC claim for each product item or the total products as follows: <ul style="list-style-type: none"> i. the claim “FSC 100%” for products from FSC 100% product groups; ii. the claim “FSC Controlled Wood” for products from FSC Controlled Wood product groups. h) If separate transport documents are issued, information sufficient to link the sales document and related transport documentation to each other. 	<p>NE</p>	
<p>2.4 The FME shall include the same information as required in 2.3 in the related delivery documentation, if the sales document (or copy of it) is not included with the shipment of the product.</p> <p>Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V2-1 Clause 6.1.1 and 6.1.2</p>	<p>NE</p>	

<p>2.5 When the FME has demonstrated it is not able to include the required FSC claim as specified above in 6.1.1 and 6.1.2 in sales and delivery documents due to space constraints, through an exception, SCS can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company’s webpage with verifiable product information). This practice is only acceptable when SCS is satisfied that the supplementary method proposed by the FME complies with the following criteria:</p> <ul style="list-style-type: none"> a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the document; b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary evidence; c) In cases where the sales and delivery documents contain multiple products with different FSC Claims, a clear identification for each product shall be included to cross-reference it with the associated FSC claim provided in the supplementary evidence. <p><i>FSC-ADVICE-40-004-05</i></p>	<p>NE</p>	
<p>3. Labeling and Promotion <input type="checkbox"/> n/a</p>		
<p>3.1 The FME shall adhere to relevant trademark use requirements of FSC-STD-50-001 V1-2 described in the <i>SCS Trademark Annex for FMEs</i>.</p>	<p>NC</p>	<p>See CAR 2017.3</p>
<p>4. Outsourcing <input type="checkbox"/> n/a</p>		
<p>5. Training and/or Communication Strategies</p>		

Appendix 7 – Group Management Programs

SCS audits Group entities and group members to the FSC Group Management Standard with the same frequency. All Principles in the FSC Forest Management Standard are evaluated – during the full evaluation or reevaluation audit and once again over the course of validity of the certificate during annual surveillance audits. SCS will also audit group clients to the Group Management Standard if there have been substantial changes to group management or the scope of the certificate during the previous year, such as a large change in the number of group members or changes to the policies of administering the group.

Group Management Conformance Table

Requirement	C/NC	Comment / CAR
PART 1 QUALITY SYSTEM REQUIREMENTS		
C1 General Requirements		
1.1 The Group entity shall be an independent legal entity or an individual acting as a legal entity.	C	WI DNR is an established legal entity with proper authority to manage the group. WIDNR is authorized through Chapter Wisconsin Statute 15.34.
1.2 The Group entity shall comply with relevant legal obligations, as registration and payment of applicable fees and taxes.	C	WI DNR is an established legal entity with authority for registration and payment of applicable fees. Evidence: Forest Tax Law handbook. Deed and proof of ownership are kept in each case file (MFL order #)
1.3 The Group entity shall have a written public policy of commitment to the FSC Principles and Criteria.	C	Forest Tax Handbook
1.4 The Group entity shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable FSC standards.	C	Forest Tax Handbook, Private Forestry Handbook Chapter 10.- Training requirements for Cooperating Foresters. DNR collaborates with Wisconsin Woodland Owner Association and UW-Extension to offer meetings and field days to offer land owner training. For COC related training, see analysis of conformance to COC indicators for FMEs.
C2 Responsibilities		
2.1 The Group entity shall clearly define and document the division of responsibilities between the Group entity and the Group members in relation to forest management activities (for example with respect to management planning, monitoring, harvesting, quality control, marketing, timber sale, etc). <i>NOTE: The actual division of responsibilities may differ greatly between different group certification schemes. Responsibilities regarding compliance to the applicable Forest Stewardship Standard may be divided between the Group entity and Group members in order to take into account of a landscape approach.</i>	C	Group Entity responsibilities: Forest Tax Handbook- Group Manager 21-4 DNR Service Foresters 21-4 Cooperating Foresters 21-5 SLIMF Group member responsibilities: Forest Tax Handbook- Group Members 21-6
2.2 The Group entity shall appoint a management representative as having overall responsibility and authority for the Group entity's compliance with all applicable requirements of this standard.	C	WI DNR Forest Tax Law Program and Policy Chief (currently Acting).
2.3 Group entity staff and Group members shall	C	Demonstrated knowledge was adequate with the exception of

demonstrate knowledge of the Group’s procedures and the applicable Forest Stewardship Standard.		those topics covered by the CARs and Observations of this report.
C3 Group entity’s procedures		
3.1 The Group entity shall establish, implement and maintain written procedures for Group membership covering all applicable requirements of this standard, according to scale and complexity of the group including:	C	Forest Tax Handbook
I. Organizational structure;	C	Forest Tax Handbook Chapter 21
II. Responsibilities of the Group entity and the Group members including main activities to fulfill such responsibilities (i.e. Development of management plans, sales and marketing of FSC products, harvesting, planting, monitoring, etc);	C	Forest Tax Handbook Chapter 21
III. Rules regarding eligibility for membership to the Group;	C	Forest Tax Handbook Chapter 21
IV. Rules regarding withdrawal / suspension of members from the Group;	C	Forest Tax Handbook Chapter 21
V. Clear description of the process to fulfill any corrective action requests issued internally and by the certification body including timelines and implications if any of the corrective actions are not complied with;	C	Forest Tax Handbook Chapter 21
VI. Documented procedures for the inclusion of new Group members;	C	Forest Tax Handbook Chapter 21
VII. Complaints procedure for Group members.	C	Forest Tax Handbook Chapter 21
3.2 The Group entity’s procedures shall be sufficient to establish an efficient internal control system ensuring that all members are fulfilling applicable requirements.	C	2016: DNR maintains a Cutting Notice Registration list of private sector individuals that are either Cooperating Foresters (through DNR’s Cooperating Forester Program), Accredited Foresters (membership in SAF, ACF, WCF), or Other Professionals (5+ years’ experience). The CN Registration List is available to DNR Foresters when entering a Cutting Notice into the WisFIRS tracking system. A current check of the Registration list shows 442 individuals registered with 34 shown as Other Professionals (7.7%). An observational review of those Other Professionals registered indicates that most are

		<p>either graduate foresters (20) or technicians (2) with a smaller percentage being logging contractors (12).</p> <p>2017: Changes to the Forest Tax Section being initiated July 1, 2017 will result in fewer DNR Forester positions (34 vs. 140+) being directly involved in cutting notice review and processing, with an anticipated higher level of staff knowledge and experience in forest tax law program administration with a more concentrated and consistent treatment of CNs and subsequent communications with private-sectors foresters, other professionals. With fewer DNR Foresters charged with tax law work, staff can develop and cultivate strong working relationships with private sector foresters, other professionals, landowners, and logging contractors, and can tailor guidance and education on the CN process to specific cases and individuals.</p> <p>Currently there has been no training specifically targeted to Other Professionals. General educational opportunities related to Cutting Notices and timber sales can be found in several places.</p> <ul style="list-style-type: none"> • A number of topics related to the MFL and FCL programs including timber harvesting and the video series on Cutting Notice preparation done in 2015 are maintained on the DNR Forestry Website for viewing http://dnr.wi.gov/topic/ForestLandowners/ • The updated Forest Tax Law Handbook will be released later this year and will include changes in the CN process initiated both prior to and after Act 358. (The current version of the Forest Tax Law Handbook is available on-line.) • Additional resources providing information on Lake States silvicultural practices, forest management, and timber sales procedures can be found in the DNR Silviculture Handbook, the Wisconsin Forest Management Guidelines, and the DNR Timber Sale Handbook, all available on-line at http://dnr.wi.gov/topic/ForestManagement/ <p>See OBS 2016.6 closure for additional audit findings.</p>
<p>3.3 The Group entity shall define the personnel responsible for each procedure</p>	<p>C</p>	<p>See OBS 2016.6 closure for audit findings.</p>

together with the qualifications or training measures required for its implementation.		
3.4 The Group entity or the certification body shall evaluate every applicant for membership of the Group and ensure that there are no major nonconformances with applicable requirements of the Forest Stewardship Standard, and with any additional requirements for membership of the Group, prior to being granted membership of the Group. <i>NOTE: for applicants complying with SLIMF eligibility criteria for size, the initial evaluation may be done through a desk audit.</i>	C	Forest Tax Handbook Chapter 21
C4 Informed consent of Group members		
4.1 The Group entity shall provide each Group member with documentation, or access to documentation, specifying the relevant terms and conditions of Group membership. The documentation shall include:	C	Forest Tax Handbook Chapter 21
i. Access to a copy of the applicable Forest Stewardship Standard;	C	Forest Tax Handbook Chapter 21
ii. Explanation of the certification body's process;	C	Forest Tax Handbook Chapter 21
iii. Explanation of the certification body's, and FSC's rights to access the Group members' forests and documentation for the purposes of evaluation and monitoring;	C	Forest Tax Handbook Chapter 21
iv. Explanation of the certification body's, and FSC's requirements with respect to publication of information;	C	Forest Tax Handbook Chapter 21
v. Explanation of any obligations with respect to Group membership, such as: <i>NOTE: In some groups, it may be sufficient to provide individual members with a summary of these items, provided that full documentation is readily available on request at the Group entity's offices. The information should be presented in a way adapted to the language and knowledge of the Group members.</i>	C	Forest Tax Handbook Chapter 21
a. maintenance of information for monitoring purposes;	C	Forest Tax Handbook Chapter 21
b. use of systems for tracking and tracing of forest products;	C	Forest Tax Handbook Chapter 21
c. requirement to conform with conditions or corrective Forest Tax Handbook Chapter	C	Forest Tax Handbook Chapter 21

21action requests issued by the certification body and the group entity		
d. any special requirements for Group members related to marketing or sales of products within and outside of the certificate;	C	Forest Tax Handbook Chapter 21
e. other obligations of Group membership; and	C	Forest Tax Handbook Chapter 21
f. explanation of any costs associated with Group membership.	C	Forest Tax Handbook Chapter 21
4.2 A consent declaration or equivalent shall be available between the Group Entity and each Group member or the member’s representative who voluntarily wishes to participate in the Group. The consent declaration shall: <i>NOTE: A consent declaration does not have to be an individual document. It can be part of a contract or any other document (e.g. meeting minutes) that specifies the agreed relationship between the Group member and the Group entity.</i>	C	Forest Tax Handbook Chapter 21
i. include a commitment to comply with all applicable certification requirements;	C	Forest Tax Handbook Chapter 21
ii. acknowledge and agree to the obligations and responsibilities of the Group entity;	C	Forest Tax Handbook Chapter 21
iii. acknowledge and agree to the obligations and responsibilities of Group membership;	C	Forest Tax Handbook Chapter 21
iv. agree to membership of the scheme, and	C	Forest Tax Handbook Chapter 21
v. authorize the Group entity to be the primary contact for certification and to apply for certification on the member's behalf.	C	Forest Tax Handbook Chapter 21
C5 Group Records		
5.1 The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include: <i>NOTE: The amount of data that is maintained centrally by the Group entity may vary from case to case. In order to reduce costs of evaluation by the certification body, and subsequent monitoring by FSC, data should be stored</i>	C	Records maintained in forestry offices in each County. Verified in Counties selected for this audit.

<i>centrally wherever possible.</i>		
i. List of names and contact details of Group members, together with dates of entering and leaving the Group scheme, reason for leaving, and the type of forest ownership per member;	C	MFL Property Files at each county office. Verified for all MFL properties visited in 2017 audit.
ii. Any records of training provided to staff or Group members, relevant to the implementation of this standard or the applicable Forest Stewardship Standard;	C	<p>Training records verified for MFL foresters at 7 DNR offices that were subject of this audit.</p> <p>Forest Tax Handbook, Private Forestry Handbook Chapter 10.- Training requirements for Cooperating Foresters. DNR collaborates with Wisconsin Woodland Owner Association and UW-Extension to offer meetings and field days to offer land owner training.</p> <p>See also analysis of conformance to COC indicators for FMEs.</p>
iii. A map or supporting documentation describing or showing the location of the member’s forest properties;	C	Verified for all MFL properties visited in 2017 audit.
iv. Evidence of consent of all Group members;	C	Verified for all MFL properties visited in 2017 audit.
v. Documentation and records regarding recommended practices for forest management (i.e. silvicultural systems);	C	Verified for all MFL properties visited in 2017 audit. Although Cutting Notices were in property folders and processed, interviews with forestry field staff discovered that some Cutting Notice data are not being updated in WisFRS in accordance with internal procedures for maintaining group records. However, this was discovered by internal audits conducted in 2016 and the WIDNR has already formed corrective action plans and begun taking steps to make corrections. The IAR was reviewed with upper management - Met with Tax Section Team Leader, Public and Private Forestry Section Chief, Forest Management Bureau Director, Certificate Manager, Certificate Coordinator - reviewed results of internal audit results (management review), Monday April 4, 2017.
vi. Records demonstrating the implementation of any internal control or monitoring systems. Such records shall include records of internal inspections, non-compliances identified in such inspections, actions taken to correct any such non-compliance;	C	MFL 2016 Internal Audit Report Forest Tax Handbook Chapter 21
viii. Records of the estimated annual overall FSC production and annual FSC sales of the Group.	C	Forest Tax Handbook, Cutting Notice and Report See also analysis of conformance to COC indicators for FMEs.
5.2 Group records shall be retained for at least five (5) years.	C	Forest Tax Handbook Chapter 21
5.3 Group entities shall not issue any kind of	C	No sub-certificates are issued.

certificates or declarations to their group members that could be confused with FSC certificates. Group member certificates may however be requested from the certification body.		
PART 2 GROUP FEATURES		
C6 Group Size		
6.1 There is no restriction on the maximum size that a group certificate can cover in terms of number of group members, their individual forest property size or total forest area. The Group entity shall have sufficient human and technical resources to manage and control the Group in line with the requirements of this standard. <i>NOTE: The number of Group members, their individual size and the total area will however influence the evaluation intensity applied by the certification body in their annual audits.</i>	C	Forest Tax Handbook Chapter 21
6.2 The Group entity shall specify in their procedures the maximum number of members that can be supported by the management system and the human and technical capacities of the Group entity.	c	Forest Tax Handbook Chapter 21
C7 Multinational groups		
7.1 Group schemes shall only be applied to national groups which are covered by the same Forest Stewardship Standard.	NA	
7.2 In cases where homogeneous conditions between countries / regions may allow an effective and credible cross- border or multi-regional monitoring system, the Group entity shall request formal approval by FSC IC through their accredited Certification Body to allow certification of such a group scheme.	NA	
PART 3 INTERNAL MONITORING		
C8 Monitoring requirements		
8.1 The Group entity shall implement a documented monitoring and control system that includes at least the following:	c	Forest Tax Handbook Chapter 21
i. Written description of the monitoring and control system;	c	Forest Tax Handbook Chapter 21
ii. Regular (at least annual) monitoring visits to a sample of Group members to confirm continued compliance with all the requirements of the applicable Forest Stewardship Standard, and with	c	Forest Tax Handbook Chapter 21 2016 MFL Internal Audit Report

any additional requirements for membership of the Group.		
8.2 The Group entity shall define criteria to be monitored at each internal audit and according to the group characteristics, risk factors and local circumstances.	c	Forest Tax Handbook Chapter 21 2016 MFL Internal Audit Report
8.3. The minimum sample to be visited annually for internal monitoring shall be determined as follows: <i>NOTE: for the purpose of sampling, FMUs < 1,000 ha and managed by the same managerial body may be combined into a 'resource management unit' (RMU) according to the proposal made in FSC-STD-20-007 Annex 1.</i>	c	Forest Tax Handbook Chapter 21 2016 MFL Internal Audit Report
a) Type I Groups with mixed responsibilities (see section D Terms and definitions) Groups or sub-groups with mixed responsibilities shall apply a minimum sampling of $X = \sqrt{y}$ for 'normal' FMUs and $X = 0.6 * \sqrt{y}$ for FMUs < 1,000 ha. Sampling shall be increased if HCVs are threatened or land tenure or use right disputes are pending within the group.	NA	
b) Type II Resource Manager Groups (see section D Terms and definitions) Group entities who also operate as resource managers may define the required internal sampling intensity at their own discretion for the forest properties they are managing, independent of their size and ownership (the minimum numbers as defined above do not apply here).	C	Forest Tax Handbook Chapter 21 2016 MFL Internal Audit Report
8.4 For monitoring purposes the Group entity should use the same stratification into sets of 'like' FMUs as defined by the certification body in their evaluation.	C	2016 Internal Audit covered
8.5 The Group entity should visit different members in their annual monitoring than the ones selected for evaluation by the certification body, unless pending corrective actions, complaints or risk factors are requiring a revisit of the same units.	C	2016 Internal Audit covered
8.6 In the selection process of members to be visited, the Group entity should include random selection techniques.	C	2016 Internal Audit used some random selection techniques.
8.7 The Group entity shall issue corrective action requests to address non-compliances identified during their visits and monitor their implementation.	C	2016 Internal Audit Report

8.8 Additional monitoring visits shall be scheduled when potential problems arise or the Group entity receives information from stakeholders about alleged violations of the FSC requirements by Group members.	C	Internal audit results communicated to Field Operations Team. Items that require policy decisions were sent to the Forestry Leadership Team.
C9 Sales of forest products and use of the FSC trademark		
9.1 The Group entity shall document and implement a system for tracking and tracing of forest products produced by the Group members which are supposed to be sold as FSC certified.	C	Documentation and implementation required to demonstrate conformance to COC indicators for FMEs fulfills the requirements of this indicator.
9.2 For the purpose of ensuring that non certified material is not being mixed with FSC certified material, FSC products shall only be sold according to a sales protocol agreed by the Group members and the Group entity.	C	Documentation and implementation required to demonstrate conformance to COC indicators for FMEs fulfills the requirements of this indicator.
9.3 The Group entity shall ensure that all invoices for sales of FSC certified material are issued with the required information (see FSC-STD-40-004 V2-0 Clause 6.1.1) and are filed by the group members.	C	Documentation and implementation required to demonstrate conformance to COC indicators for FMEs fulfills the requirements of this indicator.
9.4 The Group entity shall ensure that all uses of the FSC Trademark are approved by the responsible certification body in advance.	C	Documentation and implementation required to demonstrate conformance to COC indicators for FMEs fulfills the requirements of this indicator.

Group Management Program Members



FSC Annual Report
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