

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

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

SCS-FM/COC-004622
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| CERTIFIED | EXPIRATION |
| 01/Dec/2018 | 30/Nov/2023 |

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| DATE OF FIELD EVALUATION |
| 10-14/June/2019 |
| DATE OF LAST UPDATE |
| 8/October/2019 |

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Foreword

| Cycle in annual surveillance evaluations | | | | |
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| <input checked="" type="checkbox"/> 1 st annual evaluation | <input type="checkbox"/> 2 nd annual evaluation | <input type="checkbox"/> 3 rd annual evaluation | <input type="checkbox"/> 4 th annual evaluation | <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 Managed Forest Law Program (WIMFL), Wisconsin Department of Natural Resources (WIDNR), Division of Forestry (DOF) | | | | |

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual evaluations 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 evaluations are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope evaluation would be prohibitive and it is not mandated by FSC evaluation protocols. Rather, annual evaluations 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 evaluation);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this evaluation; 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 evaluation.

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 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 evaluation. Section B contains more detailed results and information for required FSC record-keeping or the use by the FME.

Table of Contents

| | |
|---|----|
| SECTION A – PUBLIC SUMMARY | 4 |
| 1. GENERAL INFORMATION | 4 |
| 1.1 Evaluation Team..... | 4 |
| 1.2 Total Time Spent on Evaluation | 5 |
| 1.3 Standards Used | 5 |
| 2. CERTIFICATION EVALUATION PROCESS | 5 |
| 2.1 Evaluation Itinerary, Activities, and Site Notes..... | 5 |
| 2.2 Evaluation of Management Systems | 20 |
| 3. CHANGES IN MANAGEMENT PRACTICES | 20 |
| 4. RESULTS OF EVALUATION | 20 |
| 4.1 Definitions of Major CARs, Minor CARs and Observations..... | 20 |
| 4.2 History of Findings for Certificate Period..... | 21 |
| 4.3 Existing Corrective Action Requests and Observations | 21 |
| 4.4 New Corrective Action Requests and Observations | 29 |
| 5. STAKEHOLDER COMMENTS | 37 |
| 5.1 Stakeholder Groups Consulted | 37 |
| 5.2 Summary of Stakeholder Comments and Evaluation Team Responses | 37 |
| 6. CERTIFICATION DECISION | 39 |
| 7. ANNUAL DATA UPDATE | 39 |
| SECTION B – APPENDICES (CONFIDENTIAL)..... | 45 |
| Appendix 1 – List of FMUs Selected for Evaluation | 45 |
| Appendix 2 – Staff and Stakeholders Consulted..... | 45 |
| Appendix 3 – Additional Evaluation Techniques Employed | 45 |
| Appendix 4 – Required Tracking | 45 |
| Appendix 5 – Detailed Observations..... | 46 |
| Appendix 6 – Chain of Custody Indicators for FMEs Conformance Table | 69 |
| Appendix 7 – Trademark Standard Conformance Table..... | 69 |
| Appendix 8 – Group Management Program..... | 74 |

SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Evaluation Team

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| Auditor name: | Beth Jacqmain | Auditor role: | FSC Lead Auditor |
| Qualifications: | Beth is a Senior Certification Forester with SCS Global Services. Master of Science in Forest Biology/Ecology from Auburn University and Bachelor of Science in Forest Management from Michigan State University. Beth has 20+ years' experience in forestry including public land management, private consulting, and private corporate forest management working with landowners and harvest crews. Qualified ANSI RAB accredited ISO 14001 EMS Lead Auditor and a FSC Lead Auditor for Forest Management/Chain of Custody. Audited and led FSC evaluations, harvest and logging operations certification audits; and joint/combined PEFC (AFS, RW, SFI, ATFS) audits. An 11-year member of the Forest Guild, 21-year adjunct-Faculty with Itasca Community College, Natural Resources Department. Member 20+ years Society of American Foresters, served MN State Chair 2010 and multiple committees, state and national, throughout. Beth's experience is in forest management and ecology; ecosystem silviculture; the use of silviculture towards meeting strategic and tactical goals; nursery/tree regeneration; forest timber quality improvement (sawmill/veneer), CSA/FIA Phase II forest inventory; conifer thinning operations, pine restoration, wildfire fighting, and fire ecology in conifer dominated systems. Beth has conducted evaluations throughout the United States, and in Australia, New Zealand, Republic of Fiji, and Slovakia. Beth has experience in forest ecology and management in the Midwest, Pacific Northwest, and the southeastern US. | | |
| Auditor name: | Michelle Matteo | Auditor role: | FSC Auditor |
| Qualifications: | Michelle Matteo, FSC/SFI/PEFC/ATFS Senior Lead Auditor, Arborist, Wildlife Biologist, and Forester. Michelle L. Matteo, is qualified as a Senior Lead Auditor to conduct Forest Management, Procurement, and Chain of Custody audits under the Forest Stewardship Council, PEFC, ATFS, and the Sustainable Forestry Initiative Standards. Michelle is a forester and arborist, based in Southern New England, and maintains a (state) Massachusetts Forester License as well as an International Society of Arboriculture (ISA) Certification. She has over 13 years of experience as an auditor. She has conducted hundreds of Forest Management, Fiber Sourcing, and Chain of Custody audits for companies at all levels of the supply chain and different manufacturing processes, and completed a 3-day ISO 19011 training designed & presented in relation to the FSC Standards. 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, both from the University of Massachusetts. | | |
| Auditor name: | Shannon Wilks | Auditor role: | FSC Auditor |
| Qualifications: | Shannon Wilks has over 27 years of professional experience in the forest industry. His roles have included procurement, supply chain management, contract negotiations and environmental management compliance. His experience | | |

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| | includes 20 years with a global forest products company where he spent most of his career in the southern United States. He has also managed industrial properties with land management functions. Mr. Wilks is a Controlled Wood Senior Lead Auditor for FSC® Chain of Custody, Lead auditor for Sustainable Forestry Initiative (SFI®) Chain of Custody Standard, SFI® Fiber Sourcing, SFI® Forest Management Standard, Programme for the Endorsement of Forest Certification (PEFC®) Chain of Custody Standard and a Lead Auditor for Sustainable Biomass Program (SBP). Mr. Wilks is a graduate of Louisiana Tech University with a Bachelor of Science-Forest Management degree. |
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1.2 Total Time Spent on Evaluation

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| A. Number of days spent on-site assessing the applicant: | 4.5 |
| B. Number of auditors participating in on-site evaluation: | 3 |
| C. Number of days spent by any technical experts (in addition to amount in line A): | 0 |
| D. Additional days spent on preparation, stakeholder consultation, and follow-up: | 3 |
| E. Total number of person days used in evaluation: | 16.5 |

1.3 Standards Used

All standards used are available on the websites of FSC International (www.fsc.org) or SCS Global Services (www.SCSglobalServices.com). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS's Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS's COC indicators for FMEs are based on the most current versions of the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements.

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| Standards applicable <i>NOTE: Please include the full standard name and Version number and check all that apply.</i> | <input checked="" type="checkbox"/> Forest Stewardship Standard(s), including version: FSC US Forest Management Standard, v1-0, 2010. |
| | <input checked="" type="checkbox"/> FSC Trademark Standard (FSC-STD-50-001 V2-0) |
| | <input checked="" type="checkbox"/> SCS COC indicators for FMEs, V7-0 |
| | <input checked="" type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1 |
| | <input type="checkbox"/> Other: |

2. Certification Evaluation Process

2.1 Evaluation Itinerary, Activities, and Site Notes

| 10 June 2019, Monday | |
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| FMU/ location/ sites visited | Features of Interest/ Notes |
| 3:00 - 6:00 PM Green Bay Field Office | Meet with Tax Law Section Staff for preliminary Opening Meeting <ul style="list-style-type: none"> Client update / discuss changes to the Facility Record Sheet (contact information, billing information, review scope, etc.) |

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| | <ul style="list-style-type: none"> • Start document and record reviews - this will continue as needed at any office visited during the audit. See previous page for the list of records/documents offices should be prepared to provide upon request. • Review of ATFS Independently Managed Group (IMG) Certification Standards 2015-2020 Selections • Management System Review • Overview of Logo or Label use |
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11 June 2019, Tuesday

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| 8:30 - 9:30 AM Green Bay Office | <p>Opening Meeting:</p> <ul style="list-style-type: none"> • Introductions, Roles, and Audit Objectives • Review audit scope, procedures & agenda, intro/update to certification standards and protocols, review of previous CARs/OBS • Overview by your staff of program <p>Final Site Selection for the WI-MFL Northeast Region, comprised of the following Counties: Brown, Door, Florence, Fond du Lac, Forest, Kewaunee, Langlade, Manitowoc, Marinette, Menominee, Oconto, Outagamie, Shawano, Sheboygan, Waupaca, & Winnebago</p> |
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| MFL Order Number | Acres | Size Cat. | Practice | Practice Date | Notes |
|------------------|-------|-----------|----------|---------------|-------|
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Date: 11 June 2019, Tuesday, Manitowoc County, Team 1

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| 31-004-2001 Matteo, Jacqmain, Wilks | 20 | 1 | Single Tree Selection | Active CN | 20-acre silver maple swamp/bottomland hardwood stand, near perennial stream with adjacent meandering braided overflow wetland. Cutting area is a wetland that must be cut under frozen ground conditions. Harvest was a winter only salvage cut in an overmature site to primarily remove the silver maple that are being impacted by the Columbian Timber Beetle, a native pest beetle that causes a large defect/stain in the bole of the infected tree. Tractor logged by landowner in winter, no issues. Landowner present for site visit; per interview, there is good communication between the landowner, the DNR forester, and the DNR Forest Health Specialist for this relatively uncommon beetle. Harvest completed in Winter of 2018-2019, Cutting Report not yet completed, estimated volume of 100 bd ft noted on Cutting Notice. |
| 36-002-2018 Wilks | 44 | 1 | Single Tree Selection | 1/18/2019 | Stands 1 (5 acres), 2 (13 acres) and 3 (8 acres) with recent harvesting activity. Logger Scott Graham-Algoma Lumber Co. No evidence of Master Logger training records observed on website. N/C: No use of water bars on steep haul/skid road. No evidence of rutting or soil movement on rocky glacial soils. Thinning activity in Stand 2 and 3 observed and conducted in frozen ground conditions-sale final executed by DNR staff on 1/18/19. Stands matched management plans. Observed 7 cages containing either chestnut or chinkapin oak seedlings within stand 1. Observed +/- 1 acre patch harvest cut adjacent and included in shelterwood cut stand. No damage observed to residual stand. |

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| 36-008-2019 Wilks | 17 | 1 | No harvest | | 14 acre conifer stand-white pine, red pine and spruce. Checks of basal area matched prescription. No damage to residual stand. Stand thinned by Burmeister-Master Logger trained. No issues to roads. No water crossings or impacts. |
| 36-011-1999 Wilks | 38 | 1 | Single Tree Selection | 11/14/2016 | Stand of upland oaks with mixture of oaks, hickory, and maples. Stand single tree selection harvested in 2016. No damage observed to residual stand. Road/trail was maintained with no evidence of soil movement/erosion. Stand contains an exclusion period for harvesting from May-August due to listing of State threaten bird species found within area. Observed boundary sign posted alerting to private land boundary. Stand was classified as Open and landowner is Ice Age Trail Alliance. |
| 36-014-1999 Wilks | 45 | 1 | Shelterwood - seeding cut | 4/24/2015 | Stand 4 (15 acre) stand of upland hardwood. Approximately 7 acres of southern part of stand had been harvested for oak release around 2014/2015 by landowner. OBS: Stand description on ground did not match management plan documents. No evidence of oak release observed in maps/documents and no delineation of stand 4 noted based on landowner action to release oaks. Evidence observed of young oak seedlings. Landowner-Jeff Shuler former Manitowoc County Tree Farmer of Year in 2015. Landowner trained in chainsaw safety and attended Master Woodlands Stewardship Program. Harvest conducted by landowner. Never updated or revised FMP. |
| 36-022-2014 Wilks | 28 | 1 | No harvest | | Bottomland hardwood stand of Elm, Basswood, Maple and Ash. No activity observed. Observed planted area of flowering plants planted as pollinator habitat in conjunction with NRCS. Observed hand planted area of spruce and white pines. No evidence of soil movement. Observed invasive species of Phragmites and Reed Canary grass. Advice given by DNR staff for mitigation to landowner. Ground conditions matched management plans. |
| 36-205-1996 Wilks | 80 | 1 | No harvest | | Stand 1 (70 acres) upland hardwood stand with release of oaks and cherry. Approximate age of 29 year old stand. Noticeable difference in quality and size of oaks and black cherry crop trees. Landowner released on 3 sides undesirable species of maples, ash and elms. Utilized for firewood. No damage and quality road system maintained by landowner. Stand 2 (10 acre) bottomland hardwood stand with border of flowing stream. No evidence of soil movement or signs of harvesting near stream. |

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| 36-001-2017 Wilks | 45 | 1 | Single Tree Selection | 3/27/2019 | Stands 2 (19 acre) & 4 (4 acre) single tree selection to remove ash, maples and basswood. Reduced Ash content for Emerald Ash Borer. Harvested by landowner for firewood. Split and stacked firewood staged throughout stands. Very nice walking trail. Stand 4 adjacent to Manitowoc River. No impacts to water or evidence of soil movement. Excellent job of harvesting with no evidence of damage to residual stand. Basal area check matched the prescription. |
| 36-022-2014 Wilks | 28 | 1 | No harvest | | Bottomland hardwood stand of Elm, Basswood, Maple and Ash. No activity observed. Observed planted area of flowering plants planted as pollinator habitat in conjunction with NRCS. Observed hand planted area of spruce and white pines. No evidence of soil movement. Observed invasive species of Phragmites and Reed Canary grass. Advice given by DNR staff for mitigation to landowner. Ground conditions matched management plans. |
| Date: 11 June 2019, Tuesday, Door County, Team 2 | | | | | |
| 15-026-2001 Jacqmain | 33 | 1 | Thinning, Stand 3 (6 acres) | 4/26/2019 | Cedar, aspen, spruce & balsam fir stand. Firewood cutting thinning from below. Removal of aspen, birch, and storm damaged trees. Parts of thinning used to establish a new ATV trail through property. No heavy equipment used, equipment cleaned prior to arrival on site for invasive concerns. No BMP issues. |
| 15-014-1989 Jacqmain | 40 | 1 | Thinning | Active CN | White pine, white spruce, balsam fir stands. TSI thinning in 30 year old stand. Frozen ground cutting. |
| 15-004-2018 Jacqmain | 40 | 1 | Single Tree Selection | 5/8/2019 | Northern Hardwoods thinning removing mainly sugar maple, along with some white ash, basswood, and beech. Landowner administered sale. Selection thinning, abundant sugar maple saplings throughout. Winter frozen ground harvest, little to no damage on residuals. |
| 15-015-2001 Jacqmain | 15 | 1 | Thinning | 4/26/2019 | White pine, planted 1985. First thin. Eurasian bush honeysuckle detected during sale set up, requirement to clean equipment before arrival and before departure from site. Residual tree damage observed. |
| 15-007-2014 Jacqmain | 40 | 1 | Coppice (e.g. aspen regeneration cuts) | 2/9/2017 | Cedar release with patches of coppice. Removal of older aspen and birch (approx 60-70 yo) in a cedar stand, some thinning in dense cedar areas. |
| 15-009-2012 Jacqmain | | 4 | Single Tree Selection | 3/1/2017 | Inspecting forester found some areas within stand where basal areas were lower than prescribed. Some spots of dom/codom trees being harvested instead of intermediate. Order of removal was not followed. Forester addressed by communicating with landowner and updating in WISFIRs. |
| Date: 11 June 2019, Tuesday, Oconto County, Team 3 | | | | | |
| 43-007-2013 | 38 | 4 | Clearcut/oak salvage | 11/11/16 | Landowner interview. Fall 2016 pesticide application on a few oak stumps in corner of section by landowner to combat oak |

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| Matteo | | | | | wilt. Landowner did not report pesticide usage to MFL, however was aware of the need to use a specific type of pesticide (Garlon), based on their forester's recommendation. Clearcut large stand of oak and aspen under dry conditions to remove infected oaks. Stand is bounded by USFS land to the west and a bog to the south, stand slopes to the NW, BMPs applied adequately. Cutting Report dated 11/11/16 with Land Exam updated on 12/05/16. Scattered green tree retention observed, slash low, site is showing adequate regeneration. Good communication between the Club and MFL foresters. N/C: This ATFS Size category 4 Order has non-contiguous parcels in the Order, violating the contiguity clause for ATFS. County Highway T, over 84' wide, bisects the parcels in the Order. |
| Just 43-019-2013 Matteo | | 1 | No harvest | | Landowner interview. Non-mandatory practice hand planting of conifers occurred in the past with seedlings of DNR origin. In the southern part of the Order, viewed 17 ac hemlock stand. Single tree selection scheduled for 2032. Adjacent Tamarack Stand (4 ac) in poor shape, scheduled for 2032 clearcut harvest under frozen conditions. Stand 2 (8 ac) aspen saplings and white pines, has a smaller component of other mixed hardwoods present, no mandatory practice scheduled. Landowner present for site visit and uses that land for hunting, recreation, and firewood. Field bisects that two pieces of the Order, some encroachment to the field by brush on the northern part of the Order – landowner will be removing brush back to the original Stand boundaries. |
| 43-056-2014 Matteo | 16 | 1 | Sale set-up, not harvested, intermediate thinning | | Cutting notice (CN) completed by landowner, not yet approved by DNR Forester. Red pine thinning for part of Stand 9 (6 ac) with even-aged management, and thin the remainder of Stand 9 with a single tree selection down to a BA of 80 sqft/ac. Intermediate thinning of cedar Stand 11 (3 ac) with even-aged management. SMZ buffer noted in the CN viewed on the ground, old bridge abutment present. Southern sale & property boundary viewed. Existing woods road present and in good condition. Canary grass present and treatment indicated on the CN. |
| 43-004-2011 Matteo | 35 | 1 | Clearcut (relying on regeneration by seed) | 02/04/2019 | Harvest along woods road from house into harvested stand to allow better access, woods road in very good condition. Small wetland/pond with intermittent outlet present, buffer respected. Release of maple Stand 5 (4 ac) with pin oak removal. Scotch & red pine and aspen removal harvest in Stands 1 & 3 and 2 (7 & 18 ac and 2 ac respectively). Slash low and very little damage to residual stems. Regeneration already observed. CR filed 10/17/18. Landowner requests DNR review and approval, it is unclear if CN/CR field visit completed. |

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| 43-037-2013 Matteo | 73 | 1 | Thinning & clearcut | 1/29/2019 | 61 Harvest acres. Stands 1, 2, & 3 - Marked to cut red pine areas, oak clearcut, and oak select cut area. Red pine thinning, no issues. Oak clearcut, stumps slightly high. Oak with retention, green tree and wildlife trees viewed. Gated access, well-marked. Existing woods road in good condition, protected marked stream buffer viewed on the 2 intermittent streams, culvert in good shape. Oak wilt restriction for timing of harvest. Potential habitat for endangered insect noted in CN and need to protect lupine plants if observed. Some quantity of low-quality wood left on landing, likely for firewood. Partial Cutting Report filed. FMP marked 'Incomplete' |
| 43-038-2013 Matteo | 112 | 1 | Thinning | 2/5/2019 | Adjacent Order to 43-37-2013. 37 ac. harvest area. Similar prescription to 43-037-2013 viewed. FMP marked 'Incomplete'. |
| 43-031-2000 Matteo | 33 | 1 | Group selection | 7/25/2017 | Landowner interview. Red maple Stand 1 (17 ac). BA reduced to approx. 90 sqft/ac with 3-4 gaps per ac, 35-75' in diameter. Slash low, coarse woody debris and wildlife trees observed. Swamp hardwood Stand 2, (12 ac) partially harvested. Oak & maple seedlings present in harvested Stands 1 & 2, responding to the site changes in this first post-harvest growing season. Property boundary well-marked in blue by landowner. Part of Stand 2 adjacent to the river on the south side of Stiles Rd. not harvested due to hill-side springs & saturated conditions. Oconto River buffer noted in CN. NHI hit for a state listed turtle, winter harvest conducted with frozen ground conditions outside of the turtles' breeding & nesting period. Landowner may use horse logging to complete this portion of the sale during the next winter, if site conditions permit. |
| Date: 12 June 2019, Wednesday, Marinette and Oconto County, Team 1 | | | | | |
| 38-032-2015 Wilks | 54 | 1 | Coppice (e.g. aspen regeneration cuts) | 7/26/2018 | Stand 1 marked leave trees for nesting wildlife. 5-6 trees per acre observed. No damages to residual or BMP issues. Stand 2-thinned red pines. No evidence of damage to residual stand. BA checks averaged 130 and matched Land Exam and Practices Report. No BMP issues. Ronald Albrecht landowner. Harvesting report completed July 2018. |
| 38-263-1999 Wilks | 38 | 1 | Thinning | 7/26/2018 | Stands 1 and 3 observed; ground conditions matched mgmt plan description. Access road maintained and planted with herbaceous vegetation for wildlife and stability. No BMP issues or evidence of soil movement. Harvesting report completed July 2018. |

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| 38-129-2004 Wilks | 67 | 1 | Shelterwood - seeding cut | 7/10/2017 | 36 acre select cut removing aspen and marked orange trees. Residual stand of oaks, maples and isolated white pines. No damage to residual stand and no evidence of BMP violations. Older water bar installed (2016 harvest period) on main road and drainage properly placed. Gated access to property. Ground conditions reflected mgmt plans. Harvesting report completed July 2017. |
| 38-111-2001 Wilks | 42 | 1 | Conversion from Even-age to Uneven-age | 2/12/2019 | Landowner-walked land and concern with rutting from recent harvest by Verso. 2 stands observed-select tree and other stand was coppice regeneration with oaks and other leave trees marked. No evidence of violations for BMPs. Contractor utilized logging debris for mats. Evidence of minimal rutting but no soil movement or erosion. Stand descriptions matched ground observations. Harvesting report completed in February 2019. Landowner satisfied with ground conditions after review and tour. |
| 38-039-2001 Wilks | 63 | 1 | Coppice (e.g. aspen regeneration cuts) | 2/22/2018 | Stands 1, 2, 4 and 5. Ground matched mgmt plans. No BMP issues or damage to residual trees in stand 4. BA plot checks confirmed desired level prescribed. Landowner Paul Schrandt present. Harvesting report completed in June 2018. |
| 38-009-2014 Wilks | 39 | 1 | Coppice (e.g. aspen regeneration cuts) | 6/29/2017 | 3 stands- harvested stand 1 for Aspen coppice and oak regen. Observed excellent regen of white oaks. Regen of aspen and maples observed. No BMP issues, boundary marked in blue. Ground conditions matched mgmt plan and cutting notice. Harvesting report completed in June 2017. High Tick count. |
| 38-274-2000 Wilks | 238 | 2 | Thinning | 4/24/2017 | Open and closed tracts. Observed stands 1, 3 and 4. Blue line for boundary and red flagging for buffer around flowing stream. Buffer observed well exceeded 35-foot guidance and no evidence of equipment incursion. Single tree selection and harvesting of balsam fir-no BMP issues, use of logging debris for mats in low area. Evidence of rutting but no impacts to water or soil movement. Harvesting report completed in April 2017. |
| Oconto County | | | | | |
| 43-027-2014 Wilks | 35 | 1 | Coppice (e.g. aspen regeneration cuts) | 4/9/2019 | 35 acre stand. Observation in stands 2 & 3 matched mgmt. plan. Harvesting activity reflected cutting notice. No evidence of damage to residual stand. Observed green marked leave trees. Z1 area observed not managed—stand contained mature white birch, red maples and spruce. Seeding of grass on access road. No soil movement. No BMP issues. Harvesting completed and report completed in April 2019. |
| Date: 12 June 2019, Wednesday, Langlade County, Team 2 | | | | | |
| 34-277-2000 Jacqmain | 480 | 2 | Sanitation and Salvage Cutting | 1/19/2017 | Salvage cut, all hickory removed within N hwd stand for total of approx 2,000 bd ft. |

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| 34-314-2000 Jacqmain | 80 | 1 | No harvest | | Property with oak, northern hardwood, and swamp hardwood cover types. No management activity. |
| 34-271-1999 Jacqmain | 40 | 1 | Shelterwood - seeding cut | 5/20/2016 | Individual tree selection harvest in a commercially low-quality northern hardwood stand. Patchcuts placed to remove ironwood and very poor-quality stems. Winter harvesting to avoid oak wilt. "Snakey clearcut" - 1.5 acre patchcut of hdwd approx 30' wide with variable shape designed as deer habitat. |
| 34-002-2008 Jacqmain | 80 | 1 | Thinning | 5/28/2019 | Logger and landowner interview. Thinning in northern hardwoods, thinning from below using Order of Removal and creating canopy gaps removing ironwood. Poor regeneration in stand, observed by foresters in landowner contact record, review of process for landowner notifications of issues, appropriate engagement with landowners. Discussions: Logger qualifications, FISTA training program |
| 34-051-2001 Jacqmain | 37 | 1 | Invasive treatment | | Review FMP, no mandatory practices. Garlic mustard treatment by landowner April-May 2019. No issues. |
| 34-016-2014 Jacqmain | 40 | 1 | No harvest | | Northern hardwoods, no management activity. Due for management in 2020. Discussion on pre-assessment process. |
| 34-015-2014 Jacqmain | 40 | 1 | No harvest | | Plan to cut pine, light thinning in hardwoods to release advanced regeneration. No management activity. Discussions: green tree and legacy retention, Order of Removal, logger education, regeneration monitoring. |
| 34-035-2014 Jacqmain | 134 | 2 | Conversion from Even-age to Uneven-age | 10/17/2018 | Examined two types of stands - northern hardwoods and aspen. Stands 1, 3, and 5 selection harvest of northern hardwoods; stand 4 was an aspen clearcut. Erosion on main dirt road through the stand, slope 35-45 degrees with sedimentation run-off into adjacent wetland. Discussions about regeneration, erosion issue, assessing residual damage and processes for Post-Harvest recons. Discussion FMPs and Land Exam. |
| Date: 12 June 2019, Wednesday, Outagamie County, Team 3 | | | | | |
| 45-012-2012 Matteo | 40 | 1 | No harvest | | 19 ac. swamp hardwood stand harvest. Group selection harvest to create canopy gaps conducted in 2012 under frozen ground conditions. CR field checked in Dec 2015. No issues seen. Discussion regarding the process for CN & CR review & approval, WisFIRS updates, including pre- or post-harvest site visits (recon checks), and the Land Exam update process. |
| 45-005-2001 Matteo | 10 | 1 | Thinning/Ash salvage | Active CN (harvest not started) | 10 ac. Swamp hardwood thinning. CN signed 05/14/19. Ash removal and canopy gap creation marked. Harvest not yet started, as to be harvested under frozen ground conditions, due to saturated soils. Invasives present and noted in CN with |

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| | | | | | precautions to take. Notes in file to try to harvest this Order with the adjacent landowner Orders for cost efficiencies. |
| 45-013-2001 Matteo | 31 | 1 | Sanitation and Salvage Cutting | Active CN (harvest not started) | Stand 1 (15 ac.) swamp hardwood - ash salvage with canopy gap creation. Stand 2 (11 ac.) swamp hardwood –ash selection harvest/salvage with canopy gap creation and 2-ac. aspen coppice within the stand to regenerate the aspen. Stand 3 (5 ac.) northern hardwood stand on west side of Order is a mark to cut to remove ash with canopy gaps. Harvest will be occurring in all Stands ahead of the schedule noted in the Mgnt Plan, due to the impending death of ash trees by EAB. 3-year cutting notice written, due to the need to harvest under frozen ground conditions. Marking in Stands 1 & 2 not as described on the CN, due to different colors being found on the ground, than described in the CN. |
| 45-015-1996 Matteo | 13 | 1 | Single Tree Selection | Active CN (harvest not started) | Landowner interview. Stand 1 mixed hardwood (10 ac) selection harvest, mark to cut, with focus on ash removal. CN has been ready to harvest since 2013, however must have frozen or very dry ground and site condition along with logger availability has not allowed harvest to occur. Small intermittent stream running N-S through the middle of the property – CN notes WI-BMPs for Water Quality to be followed around the stream. |
| 45-008-2006 Matteo | 37 | 1 | No harvest | | Harvested in 2017, completed in Aug 2007 – aspen clearcut with good retention of large and mid-sized white oak and pine, landowner signed CN in Nov 2007, noting that the harvest was complete. N/C: Cutting Report not updated/filed in WisFIRS by MFL forester until June 2017, almost 10 years after the harvest was completed. |
| 45-015-2000 Matteo | 13 | 1 | Single Tree Selection | Active CN | Landowner interview. Landowner concerned with the amount of remaining slash and regeneration. Harvest bounded by a stream, the property line, & a field, all well-marked. Existing culvert under driveway/main road in good operation. Stands 1-Due to some blowdown from storms in summer of 2017, moved the mandatory practice date up to 2018. Stand 3 – aspen clearcut with oak reserves. Stand 5 – mixed hardwood & aspen. Some limited rutting in wet areas of Stand 2 adjacent to the landowner ponds. Wildlife trees retained, high deer browse. Oak wilt harvest timing restriction in place. 6 types of invasives noted in the CN, with ground disturbance and increased sunlight from the recent harvest, invasives will likely increase in occurrence; discussion with landowner & MFL Foresters about potential invasive plant issues and treatment, as well as deer browse strategies. |

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| 45-026-1996 Matteo | 71 | 1 | Thinning & clearcut with reserves | 3/15/2019 | Landowner interview. Landowner concerned with the amount of regeneration, but upon site walk and id of regenerating species, is comfortable with the harvest results. Stand 2 (16 ac.) - Aspen clearcut with oak reserves - Stand 3 (9 ac.) - Northern hardwoods/aspen - clearcut with reserves, particularly removing the ash. Stand 1 - Red pine 5 th row thinning – winter cut so no need for annosum treatment (Heterobasidion root disease). All Stands have little to no residual damage, regeneration is viable and multiple species represented in seedling stage. Map uploaded into WisFIRS in June 2017. CN and Report signed by landowner on 03/06/18. Post-harvest check not completed and land exam not updated to current conditions with the last land exam update noted in 1995. |
| Date: 12 June 2019, Thursday, Waupaca (1-South, 1-North), Team 1 | | | | | |
| Waupaca (1 - North) | | | | | |
| 69-012-2018 Wilks | 60 | 1 | Thinning | 1/17/2019 | White pine (old Christmas tree plantation) intermediate thinning. Weekly Pulp and Timber harvested timber. Steve Suhs landowner. BA random checks 130 basal area after harvest; 180 BA in unharvested sections. Observed successional species of aspen and red oaks within understory. Wildlife openings/food plots observed. Gated access with fire lane plowed around property. No BMP issues or damages observed to residual trees. Final harvest signed December 18. Field conditions matched mgmt plans and Land Exam Practices Report. |
| Waupaca (2-South) | | | | | |
| 69-051-2004 Wilks | 10 | 1 | Thinning | 4/6/2019 | 10 acre- historical windstorm damaged stand. Overstory removal with white pines and oaks left for regeneration. Observed white pine regeneration. Oak regeneration observed with heavy deer browse on buds. No BMP issues. Final harvest signed April 2019. Harvested by James Denk Logging. Landowner: Richard Eiberger-pleased with operations and no issues. Confirmed goal of protecting land and habitat. |
| 69-116-2013 Wilks | 55 | 1 | Thinning | 1/4/2019 | 51 acre tract-Stands 1 and P2 observed. Regeneration harvest observed behind fenced area to protect regen from deer browse. Observed maples, ash and oak reproduction. Stand P2 intermediate red pine thinning. Basal Area checks 90-100 BA. Final harvest signed January 2019. OBS: BA volume on ground did not match volumes within Land Exam information. Last updated January 2016. |

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| 69-107-2013 Wilks | 10 | 1 | Thinning | 1/5/2018 | Logger: Micheal Kielblock- SFI pro logger trained stated by landowner. Regeneration harvest completed in 2017. 3 acre fenced protection for regeneration. Observation of basswood, maple, oak, ash and white pine approximately 3-5 feet in height. No BMP issues. Landowner: Rex Pope-great example of reforestation within heavy deer population. Property bordered Waupaca River. No observation of disturbance or activity within River corridor. Field conditions matched mgmt plans. |
| 69-061-2001 Wilks | 39 | 1 | Thinning | 1/4/2019 | 38 acres-Stand 1 and 3. Regeneration harvest with fenced 12 acres to protect maples, aspen and oaks from deer. No damage to residual seed trees. OBS: No water bars installed on haul road. Landowner is planning to install diversions to minimize damage to his road. Observation of road into property confirmed landowner use of rock to stabilize and improve road. Landowner was not aware of resources available to install features to minimize soil movement. Stated Youtube was his reference. Discussion regarding WI BMP guidelines and DNR Tax Law representative agreed to email copy of WI BMP guidelines. No other BMP issues observed. |
| 69-010-1997 Wilks | 40 | 1 | Single Tree Selection | 2/14/2019 | 39 acre Release of uneven age mgmt of white pine and northern hardwoods. Ground conditions matched mgmt plans. Observed girdled Black oaks for wildlife. No BMP issues and no damages to residual stand. Some regeneration of white pines observed but additional sunlight needed. Heavy deer browse on young seedlings. Final harvest signed May 2017. |
| 69-035-2003 Wilks | 15 | 1 | Thinning | 4/30/2018 | 18 acres owned by Charitable organization. Intermediate pine thinning. Crystal River dissected property, no harvesting occurred along river. Interview with President Craig Bailey. No issues or complaints. Happy with communication and availability of DNR resources. Weekly Pulp and Timber harvested timber. Maintain property for wildlife and timber with recreational purposes. Observed invasive Japanese Barbary. Mike-DNR gave range of options for mitigation. Ground conditions matched prescription. No damages to residual stand. Final harvest signed April 2018. No BMP issues. |
| 69-072-1996 Wilks | 59 | 1 | Thinning | | 59 acre tract. Stand P1 recently thinned. Logger: Michael Kielblock- SFI pro logger trained stated by landowner. Landowner- Sam Thil hand planted red pine mixed with white pines. BA plot measured 150. Observed water diversion on road. Placed by power company that accessed for fire along power line. Roads seeded and no evidence of erosion. No BMP issues. No harvesting near water or crossings. Ground conditions met mgmt plan, but Land Land Exam and Practices stand BA not updated due to expiration of MFL in 2020. DNR representative communicated new management plan will be established by ground surveillance and information updated at that time should landowner re-apply to MFL program. |

| Date: 12 June 2019, Thursday, Waupaca (1-North), Team 2 | | | | | |
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| 69-043-2017 Jacqmain | 36 | 1 | Release – regeneration (via hand, herbicide, fire) | 4/9/2018 | Oak and aspen improvement release from competition by cutting of overtopping, mid-story woody stems of musclewood, witch hazel, iron wood and other non-commercial hardwoods. Scattered throughout the 36 acres. Prior stand practices removed large overstory, commercial stems. Discussions: mandatory practices process. FMP. |
| 69-108-1994 Jacqmain | 63 | 1 | Thinning | 12/1/2017 | Selection system harvesting to favor sugar maple and other preferred hardwood species in a northern hardwood stand. Order of removal was lower grade, large crown stems. Objective was to release crop sugar maple or form canopy gaps for regeneration. |
| 69-096-1995 Jacqmain | 39 | 1 | Thinning | 8/17/2018 | Planted red and scotch pine Intermediate thinning down to 80 sq ft BA, marked to cut. Hardwood understory retained to allow stand to succeed to native hardwood species. Prickly ash found but not affecting regeneration, no action needed. Discussion: Deer browsing control |
| 69-060-2012 Jacqmain | 67 | 1 | Shelterwood - seeding cut | 1/4/2019 | Shelterwood marked to leave, target 60 ba. Retain balsam fir, release good quality oak and maple saplings and poletimber. Seed trees leaving large diameter, large crowned oak, maple, and white pine. Oak and maple regen abundant. Cutting notice included in "BMP for Water Quality Prescription" to avoid entering the low-lying swale with heavy equipment. However, onsite inspection the permanent, all-season forest road crossed the swale in such a way that water flow and movement was impeded and ponding in several locations on the road. The road location and construction did not provide cross-drainage. |
| 69-012-2018 Jacqmain | 60 | 1 | Thinning | 1/17/2019 | Nick's Nirvana. Very high-quality northern hardwood stand after selection harvest under uneven-aged management. Residual basal area of 85 sq ft. Removal of white ash, basswood, elm and poor/old sugar maple. Canopy gaps for regeneration of sugar maple. Good regeneration throughout. Invasive species identified: prickly ash and bush honeysuckle. Landowners notified of invasives. Equipment for harvest cleaned before and after harvest to prevent spread. |
| 69-021-2015 Jacqmain | 20 | 1 | Single Tree Selection | 5/15/2017 | Northern hardwood stand where single tree selection harvest and canopy gaps were done in 2015. Plantation of red pine small saw and pole and Austrian pine was thinned after evaluation that stand was overstocked and overdue for thinning. Thinned from below to target basal area reduction by one third. One acre patchcut of aspen between sections of the northern hardwood stand with acceptable growth rates and stocking. |

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| 69-008-2004 Jacqmain | 118 | 2 | Thinning | 2/28/2017 | Landowner interview. CPW (Verso) interview. Examined 10 acres of young aspen, 3 yrs old. Thinning in northern part of property along Bear Creek. In river RMZ marked trees only to cut down to 80-90 sq ft of basal area. Discussions: BMPs; Regeneration monitoring; MFL foresters/loggers/CPW trainings; road design and construction. |
| 69-075-2003 Jacqmain | 80 | 1 | Various | | Landowner planted scattered oak seedlings and install deer exclosure fences. Wetland area selection harvest removing ash, poor quality sugar maple while retaining white cedar. BMP cleanup done by CPW (Verso). Discussion: Landowner communications, post-harvest monitoring for BMPs and regeneration. |
| Date: 12 June 2019, Thursday, Forest, Team 3 | | | | | |
| 21-323-1999 Matteo | 73 | 1 | Shelterwood - seeding cut and clearcut | Active CN | Stand 1 (12 ac) Northern hardwood – uneven aged thinning. Stand 2 (7 ac) - aspen regeneration harvest. No residual damage viewed. Part of stand not yet cut. Stand 3 (3 ac) - Swamp hardwood – even-aged regeneration harvest, species to retain noted in the CN. Stand 4 (9 ac) – Soft maple – Overstory removal to release established regeneration. Boundaries well-flagged. Loggers pulled off the site in Feb/March due to soil conditions. Not yet cut near aspen. One NHI hit, harvest conducted during the plants dormant season under winter or very dry late growing season conditions. Good regeneration present, green tree retention marked and protected, stand and harvest units boundaries well marked. Land exam last updated in 2013, prior to this mandatory harvest. |
| 21-321-1999 Matteo | 40 | 1 | Single Tree Selection | Active CN | Adjacent to Order 21-323-1999 & 21-324-1999. Stand 1 (8 ac) Northern hardwood – uneven aged thinning. Stand 3 (3 ac) - aspen regeneration harvest. Stand 5 (3 ac) - Swamp hardwood – even-aged regeneration harvest, species to retain noted in the CN. Retention of healthy pre-merchantable spruce and balsam fir. Same details for NHI hit as above. |
| 21-003-2004 Matteo | 40 | 1 | Single Tree Selection | 3/12/2018 | Logger and CPW/Forester interview. Stand 8 (40 ac) single tree selection. Stems retained have good form. Hemlock retained as thermal cover for wildlife. Den/wildlife trees retained. Frozen ground conditions for harvest, as there is a lowland area in the southern portion of the stand, that was avoided. Existing woods road is adjacent to the stand. Spill kit requirements noted in the CN. Property boundaries flagged well. CR finalized on 03/12/18, not yet updated in WisFIRS for volumes or practices. |
| 21-008-1995 | 130 | 2 | Thinning | 6/11/2018 | Winter cut only with frozen ground conditions. Harvest sites clean, low slash, no residual damage viewed. Stand 1 (14 ac) – Northern Hardwoods uneven aged thinning. |

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| Matteo | | | | | Adjacent to Armstrong Creek, maintain a 100' SMZ where the BA is greater than 60 sqft/ac., no harvesting along the banks of the creek. Very few stems removed from the stands near the creek. Stand P6 (9 ac) – 31 yo pine with even-aged management (take one row, leave 2 rows). Stand 9 (4 ac) – Black Spruce/Tamarack visited in 2017, not yet ready for the 2018 scheduled harvest, spruce healthy but small. This practice is now scheduled for 10-15 years from now. CR completed 05/28/18, checkbox for “Final Report” not checked. |
| 21-324-1999 Matteo | 79 | 1 | Group Selection | Active CN | Adjacent to Orders 21-323-1999 & 21-321-1999, harvest not yet complete. Stand 1 (9 ac) Northern hardwood – uneven aged thinning. Stand 3 (2 ac) - aspen regeneration harvest. Stand 5 (6 ac) - Swamp hardwood – even-aged regeneration harvest, species to retain noted in the CN. Must be dry or frozen ground conditions. Retention of healthy pre-merchantable spruce and balsam fir. Same details for NHI hit as above. Arch/Historic/Cultural hit – one known site within the management boundary – required frozen ground & snow cover conditions. Ground disturbance off of existing roads will not be permitted. Known stream crossing in NW corner of sale avoided. |
| 21-011-2006 Matteo | 979 | 3 | Coppice (e.g. aspen regeneration cuts) | 2/23/2017 | Stand 17, 18, & 19, Closed out Feb 2017. Steep site with rocky substrate. Existing ATV trails cross the site in multiple places. Stand 17 (36 ac) and Stand 18 (12 ac) – primarily red oak present, mark to cut to regenerate a new class of mixed hardwood species and aspen. Stand 19 (25 ac) - no-management zone to protect cultural resources. Stand boundaries respected. Cultural site and sweathouse nearby Stand 18, logger & forester maintained a no-harvest buffer around site. Big-toothed aspen and oak regeneration viewed since harvest completed. Landing seeded and in good condition, no debris or excess slash. Sale boundaries well-painted, ATV trail is red-two-lined mark. No oak wilt present, therefore using DNR guidelines, harvest can occur in the spring/summer. A steep historic woods road, adjacent to the stand in a degraded condition, has insufficient BMPs present. Logger applied limited BMPs to improve the degraded road (logs angled across the road), but historic & current ATV use has moved the material and nullified the logger’s BMP application. Machinery ruts present from lower slope of Stand 18 to the base of the slope at the border of Stand 18 with no waterbars present and a small amount of sediment delivery to base of hill on southern edge of stand (no receiving waterbody present). N/C: Some rutting from forwarder present with no BMPs applied, slight amount of sedimentation traveled down to the base of hill (no receiving water body). |

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| 21-009-2000 Matteo | 79 | 1 | No harvest | | Upcoming mandatory practice – Stand 2 (10 ac) Aspen clearcut in 2020, with natural regeneration. Existing woods roads present, property gated off of the main road. Discussion of how the DNR-MFL foresters are dealing with the backlog of recon needed for sites post-harvest, including the split of duties/tasks between the MFL and the Integrated Foresters. |
| 21-002-2019 (21-017-1994) Matteo | 25 | 1 | Single Tree Selection | 2/28/2019 | <p>Order #21-017-1994/CN #36721 and Order #21-002-2019/CN #43238.</p> <p>Harvest implemented at the very end of one enrollment into the MFL Certified Group, but not before the enrollment was renewed. As such, two Order numbers and CNs are noted here, one with the old order #, as the plan could not have been renewed until the mandatory practice was completed, but due to the winter weather conditions, the harvest was not finished and closed out until after the timing of the MFL Order renewal had begun. Differences in the Order maps present, due to differing stand delineation. 2019 Order has the more representative delineation.</p> <p>Stand 1 (14 ac) – Northern hardwoods and Stand 2 (11 ac) – Swamp hardwoods, single tree selection thinning to release crop trees. Hemlock inclusion present and maintained.</p> <p>Water bodies present: Shiner Lake and unnamed outflow from the lake. Cutting notice states that ‘no equipment’ buffers are established 100’ from the lake and 30’ from the outflow.</p> <p>2 NHI hits: 1 community associated with the lake - no impacts with buffer established around the lake. 1 reptile – harvest will occur during the dormant period, no impacts expected.</p> <p>Description of the FMP and the cutting map have discrepancies. On-site visit showed that the boundaries on the ground do not match what is noted in the CN, marked red paint lake buffer/harvest boundary is less than 100’ (near the area that includes the camp), with harvesting occurring within 70-80’ of the Lake edge for a distance of approximately 100 lineal ft.</p> <p>N/C: Harvesting within the 100’ Lake Buffer.</p> |

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| 14 June 2019, Friday | |
| 8:30 - 10:00 AM Green Bay Office | Remaining document, record reviews, and interviews. |
| 10:00 AM – 1:00 PM | Closing Meeting Preparation: Auditors take time to consolidate notes and confirm audit findings. |
| 1:00 PM | Closing Meeting and Review of preliminary Findings: Convene with all relevant staff to summarize preliminary audit findings, potential non-conformities and next steps. Set next annual audit date. |

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 reviewing documents and records, interviewing FME personnel and contractors, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observing implementation of management plans and policies in the field, and collecting and analyzing stakeholder input. When there is more than one team member, each member 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, interviews, stakeholder comments, and reviewed documents and records. Where consensus among team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

3. 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*):

Act 358 changes were effective in 2016 and the DNR is still engaged in the rule promulgation process to update Administrative Codes to comply with State Statute. The major restructuring with staff reduction but increased focus specifically to MFL, and the subset of certification related duties has been implemented and overall perceived by land owners as a positive direction based on interviews conducted during the audit. However, prioritization of duties and activities are still being finalized and articulated. There is a high-level strategic document in draft at the time of this audit that is anticipated to help clarify prioritization of duties for MFL forestry staff.

4. Results of Evaluation

4.1 Definitions of Major CARs, Minor CARs and Observations

Major CARs: Major nonconformances, either alone or in combination with nonconformances of all other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out before a certificate can be awarded. If Major CARs arise after an operation is certified, the timeframe for correcting these nonconformances is typically shorter than for Minor CARs. Certification is contingent on the certified FME's response to the CAR within the stipulated time frame.

Minor CARs: These are corrective action requests in response to minor nonconformances, which are typically limited in scale or can be characterized as an unusual lapse in the system. Most Minor CARs are the result of nonconformance at the indicator-level. Corrective actions must be closed out within a specified time period of award of the certificate.

Observations: These are subject areas where the evaluation team concludes that there is conformance, but either future nonconformance may result due to inaction or the FME could achieve exemplary status through further refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However, observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into nonconformance.

4.2 History of Findings for Certificate Period

| FM Principle | Cert/Re-cert Evaluation | 1 st Annual Evaluation | 2 nd Annual Evaluation | 3 rd Annual Evaluation | 4 th Annual Evaluation |
|--------------|-----------------------------------|--|-----------------------------------|-----------------------------------|-----------------------------------|
| No findings | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P1 | | | | | |
| P2 | | | | | |
| P3 | | | | | |
| P4 | | | | | |
| P5 | | | | | |
| P6 | Minor 6.5.b OBS 6.5.d | Major 6.5.b Minor 6.5.d Obs 6.7.a | | | |
| P7 | OBS 7.1.b | Minor 7.1.b | | | |
| P8 | | | | | |
| P9 | | | | | |
| P10 | | | | | |
| COC for FM | | | | | |
| Trademark | | | | | |
| Group | Minor 1.4 OBS 2.2 Minor 3.2 | Major 3.2 Obs 5.1.ii Minor 5.1.vi. | | | |
| Other | | | | | |

4.3 Existing Corrective Action Requests and Observations

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| Finding Number: 2018.1 | |
| Select one: <input type="checkbox"/> Major CAR <input checked="" 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 type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify): |
| FSC Indicator: | FSC US FM 6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place. |
| Non-Conformity: 2018: Auditors observed several sections of rutted roads and erosion with sediment deposition into a stream running through the harvest area (Order # 37-039-2010); no water bars had been installed. At another site, a main access haul road that was installed for a timber sale where the logging crew had pulled out of the sale in the fall. Crew was to return after oak wilt no-harvest period was done, departing for over 5 months. In the meantime, the | |

road had washed out (erosion) on slopes greater than 45% and had no water bars installed for at least 300 feet. (Order # 27-018-2016). There were 75 sites inspected during this audit and all other sites were in conformance. Due to overall field conformance with this indicator it was determined this is a minor, isolated system breakdown rather than a fundamental failure justifying the grading of this finding as a Minor non-conformity.

2019: The following sites had road related BMP issues:

1. Order # 36-002-2018- No use of water bars on steep haul/skid road. Sale final executed by DNR staff on 1/18/19.
2. Order # 34-035-2014 - Erosion and main dirt road through the stand, slope 35-45 degrees with sedimentation run-off into adjacent wetland. Forester was aware of BMP requirements and described typical practice to address the issue. For this forester common practice included notifying landowner to discuss issue and potential removal from the certification group. However, the erosion was not noted on any inspection documents and there is an apparent gap in when, or if, any additional follow up would have been done such that this issue would have been identified, providing opportunity for correction, outside of an external audit.
3. Order # 69-060-2012 - Cutting notice included in "BMP for Water Quality Prescription" to avoid entering the low-lying swale with heavy equipment. However, at the on-site inspection the permanent, all-season forest road crossed the swale impeding water flow and movement and resulting in sediment deposition in and outside the natural stream flow with ponding in several locations on the road.
4. Order # 21-011-2006 – Some downhill rutting present at site with no waterbars present, small amount of sediment delivery to base of hill on southern edge of stand (no receiving waterbody present). A steep historic woods road, adjacent to the stand in a degraded condition, had insufficient BMPs present. Logger applied limited BMPs to improve the degraded road (logs angled across the road), but historic & current ATV use has moved the material and nullified the BMP application.
5. Order # 21-002-2019 (21-017-1994) - Shiner Lake is adjacent to the Harvest Area. Cutting notice states that buffer of 100 ft. be applied to the lake. On-site visit showed that the buffer is less than 100' near the area that includes the camp, with harvesting occurring within 70-80' of the Lake edge for a distance of approximately 100 lineal ft.

In the 2019 external certification sampling, 5 of 70 sites had road BMP issues representing about 7%. In 2018, the result was 12% (Minor), and in 2017 certification audit sampling found BMP issues at 3% (Obs). The 2017 results were consistent with the last state-wide BMP monitoring, strictly for water quality, last done in 2015. No more recent or alternative results for the last 4 years were presented to the audit team. Given this is a repeated finding and no other method of post-harvest BMP monitoring was provided this Minor is upgraded to a Major.

Corrective Action Request (or Observation):

MFL forest operations must meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place. This includes those activities that take place outside of defined DNR engagement making this the responsibility of the landowner.

FME response
(including any evidence submitted)

2018: WIDNR discussed options with the responsible landowners and they indicated that they were unable or unwilling to install water bars and otherwise mitigate the erosion issues. As a result, MFL group manager reports the two orders have been removed from the Certified Group.

SCS review

The audit team was unable to confirm the withdrawal of these members from the group. No evidence was submitted to verify DNR acted to remove these orders from the certification group. WI DNR did not offer any of the other forms of acceptable evidence that would enable further consideration for closure of this CAR such as competent root cause analysis, other corrective actions or mitigations with these landowners, preventive actions such as landowner education, metrics for future monitoring, nor continuous improvement pathways through internal audit systems. Given lack of evidence of conformance and repeated findings observed during the 2019 audit this Minor is upgraded to Major CAR 2019.1

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| Status of CAR: | <input type="checkbox"/> Closed <input checked="" type="checkbox"/> Upgraded to Major CAR 2019.1 <input type="checkbox"/> Other decision (refer to description above) |
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| Finding Number: 2018.2 |
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| Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation |
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| FMU CAR/OBS issued to (when more than one FMU): |
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| | |
|-----------------|---|
| 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 regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input checked="" type="checkbox"/> Other deadline (specify): <i>12 months or next regularly scheduled audit</i> |
|-----------------|---|

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| FSC Indicator: | 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. |
|-----------------------|---|

Non-Conformity (or Background/ Justification in the case of Observations):

2018: Observation 2017.1 was carried over: BMPs for water bar installation were consistently applied across most audit sites in accordance with *Wisconsin’s Forestry Best Management Practices for Water Quality* (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, instances of incomplete or insufficient water bars, inadequate gravel installed at road crossings of small intermittent streams, and minor soil compaction. These roads were nonetheless in conformance justifying this finding as an observation.

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, and 37-086-2012. Detailed information for these sites are included in Section 2.1 of this audit report.

2019: Five sites were observed with road BMP issues by all members of the audit teams in differing Counties of inspection. Landowner and CPW interviews identified gaps in implementing and monitoring of BMP requirements, or related Cutting Notice requirements, specifically related to road maintenance and construction.

1. Order # 36-002-2018- No use of water bars on steep haul/skid road. Sale final executed by DNR staff on 1/18/19.
2. Order # 34-035-2014 - Erosion and main dirt road through the stand, slope 35-45 degrees with sedimentation run-off into adjacent wetland. Forester was aware of BMP requirements and described typical practice to address the issue. For this forester common practice included notifying landowner to discuss issue and potential removal from the certification group. However, the erosion was not noted on any inspection documents and there is an apparent gap in when, or if, any additional follow up would have been done such that this issue would have been identified, providing opportunity for correction, outside of an external audit.
3. Order # 69-060-2012 - Cutting notice included in "BMP for Water Quality Prescription" to avoid entering the low-lying swale with heavy equipment. However, at the on-site inspection the permanent, all-season forest road crossed the swale impeding water flow and movement and resulting in sediment deposition in and outside the natural stream flow with ponding in several locations on the road.
4. Order # 21-011-2006 – Some downhill rutting present at site with no waterbars present, small amount of sediment delivery to base of hill on southern edge of stand (no receiving waterbody present). A steep historic woods road, adjacent to the stand in a degraded condition, had insufficient BMPs present. Logger applied limited BMPs to improve the degraded road (logs angled across the road), but historic & current ATV use has moved the material and nullified the BMP application.

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| <p>5. Order # 21-002-2019 (21-017-1994) - Shiner Lake is adjacent to the Harvest Area. Cutting notice states that buffer of 100 ft. be applied to the lake. On-site visit showed that the buffer is less than 100' near the area that includes the camp, with harvesting occurring within 70-80' of the Lake edge for a distance of approximately 100 lineal ft.</p> <p>Interviews with multiple CPWs from different state regions expressed concerns about lack of understanding of road BMPs, and other post-harvest inspection needs, by landowners as contributing to future problems related to water quality as included in <i>Wisconsin's Forestry Best Management Practices for Water Quality</i>, Chapter 4 (Forest Roads) and 8 (Wetlands).</p> | |
| <p>Corrective Action Request (or Justification for Observation):</p> <p>2018: SCS reviewed the 2018 responses including the 2018 internal audit report and findings and confirmed findings as described above; confirmed that Private Forestry Outreach Specialist was hired, and confirmed by interview with Tax Section Chief that communications with MFL group member landowners will be a focus moving forward. However, given new findings related to water bar installations, this Observation will remain open to confirm implementation and effectiveness of these actions next year.</p> <p>2017: 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> | |
| <p>FME response (including any evidence submitted)</p> | <p>2017 Response:</p> <p>1. DNR made this one of their focus areas of internal MFL review in May of 2018. DNR found that in most cases BMP's for water quality are implemented and implemented correctly. <i>DNR is investigating:</i> • Additional targeted BMP training for WDNR Tax Law Forestry Specialists and particularly in the Driftless region of Wisconsin, • Training opportunities for the contractors who typically install logging road systems. • DNR is also looking at ways to cost effectively communicate with MFL owners to make them aware of the need to address water quality during and after timber harvest operations. 2. The Division of Forestry has hired a communications specialist with a focus on private woodland owners and improving communication with MFL owners has been discussed as an area to be included in her future work plans.</p> <p>2018 response: FME reports they continue to move forward on outreach campaign with MFL landowners. FME reported partnering with Domtar to produce a high-quality trifold brochure on the benefits and requirements of forest certification that will be provided to MFL landowners and made available to members of the public online and at our service centers. This brochure was made available to the audit team during the audit.</p> |
| <p>SCS review</p> | <p>2018: SCS reviewed the <i>draft</i> internal audit report findings and confirmed findings as described above under 2017 response; confirmed that new communications specialist has been hired, and confirmed by interview with Tax Section Chief that communications with MFL group member landowners will be a focus moving forward. However, given new findings related to water bar installations (Minor CAR 2018.1), this Observation will remain open to confirm implementation and effectiveness of these actions next year.</p> <p>2019: The 2018 Response did not include follow up information, or completion of DNR Investigation bullet points from the 2017 Response, above. The most recent internal audit, 2018/2019 did detect related non-conformities. In one identified non-conformity there were corrections/mitigations actions taken. However, in the other non-conformity identified, there was no corrective action issued. The prior year internal audit was a Draft document, 2017/2018 and also included internal findings demonstrating system functionality, however there no evidence presented of the implementation of corrective actions resulting from the 2017/2018 internal audit.</p> <p>The current understanding of roles and responsibilities for meeting this CAR is that it is the responsibility of the landowner. This is based on the Forest Management Plan language</p> |

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| | and <i>Specific group member duties</i> , as included on 21-6 of the <i>State of Wisconsin DNR, Forest Tax Law Handbook</i> 2450.5. Responsibility for carrying this out may be transferred or assumed by CPWs. This understanding was confirmed by MFL Forestry Tax Law Specialists (FTLS) and CPWs. Given the repeated finding of road issues, lack of evidence presented of landowner educational trainings for these topic areas, and insufficient corrections or corrective actions, this finding is upgraded to Minor. |
| Status of CAR: | <input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> <i>Other decision (refer to description above): Raised to Minor CAR 2019.2</i> |

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| Finding Number: 2018.3 | |
| 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/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify): |
| FSC Indicator: | 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>Non-Conformity: 2018: On site/<i>Order # 29-029-2008</i>: Trees marked on the ground were inconsistent with the Cutting Notice (CN), which functions as the silvicultural prescription, and the CN did not match the Forest Management Plan (FMP). The CN describes the prescription for Stand 2 as, "Unevenaged management. Group selection and improvement thinning." The prescription in the land exam and practices report states, "Shelterwood Regeneration Harvest - Preparatory cut". There are supposed to be small and large gaps in the eastern side of the stand, as noted on the map submitted with the cutting notice, (totaling 6 patches) but there was only 1 piece of flagging found and the patches were not delineated adequately on the ground. The trees marked for removal in the sale, did not match the description in the cutting notice. Finally, the description of the stand contained in the FMP was not wholly accurate. This sale was marked, but not yet up for sale. Additionally, if the stream running through the site is to be crossed, a permitted stream crossing must be applied for; also the original cutting notice from 2012 was rejected, as it was considered to be high-grading of the stand. The resubmitted cutting notice was revised and previously marked trees orange cut marks were blacked out for a few trees viewed. On site/<i>Order # 50-008-2009</i>: the proposed cutting practices were noted as "Cut all aspen, ironwood, and trees marked with orange paint." Site inspection by the auditors revealed numerous large aspen and ironwood that were uncut. There were also several trees marked with orange paint that were not cut. Relatively few stumps were found in spite of thoroughly searching the FMU, and it was questionable as to whether the volume reportedly harvested, particularly the volume of aspen, matched the number and size of stumps observed qualitatively. These were the only sites identified during the audit with this incongruity where implementation did not match either FMP or CN. However, there are enough new steps and procedures in the MFL program resulting in changes of roles and responsibilities related to the new Act 358, and codes currently being crafted, that further review is warranted. The land exam is not recognized as a formal document in the MFL so it was not clear to all auditors how the FMP is being updated. The MFL program would be strengthened by reviewing how Cutting Reports are used to ensure the FMP, CN, and implementation are linked and accurate. There were 75 sites inspected during the 2018 audit and this was the only site discovered with this disparity between FMP, CN and field set up or harvesting. This finding was determined to be a minor, isolated breakdown rather than a fundamental system failure which justifies grading as a Minor rather than a Major non-conformity.</p> | |

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| <p>2019: Two new sites were observed with plans that were not updated in a timely fashion to reflect harvest activities. While changes in the silviculture applied may have been justifiable, the record keeping of such as part of the FMP update process was insufficient. See site descriptions for the Order #'s below:</p> <ul style="list-style-type: none"> Order # 36-014-1999-Stand 4 (15 acre) stand of upland hardwood. Approximately 7 acres of southern part of stand had been harvested for oak release around 2014/2015 by landowner. Stand description on ground did not match management plan documents. No evidence of oak release observed in maps/documents and no delineation of stand 4 noted based on landowner action to release oaks. Order # 69-116-2013- Stand P2 intermediate red pine thinning. Basal Area checks 90-100 BA. Final harvest signed January 2019. BA volume on ground did not match volumes within Land Exam information. Last updated January 2016. | |
| <p>Corrective Action Request (or Observation): Actions undertaken on the FMU should be consistent with the management plan and be consistent towards achieving the stated goals and prescribed objectives of the plan.</p> | |
| <p>FME response (including any evidence submitted)</p> | <p>Additional training has been provided to all Tax Law Section (TLS) staff regarding DNR authorities to review and deny cutting notices. In the cases that were observed in 2017, the local TLS staff continue to work with landowners and partners to reach compliance with their management plan.</p> |
| <p>SCS review</p> | <p>SCS reviewed staff training materials, agendas, and attendance lists for training. Additionally, auditors reviewed training materials for CPWs. Interviews with staff confirmed understanding and implementation of this training during FMP implementation. Interviews with landowners confirmed their understanding of silvicultural objectives and use of harvesting towards achieving those objectives. Interviews with CPWs confirmed consistent understanding of expectations with regards to implementation of plans in the field. However, given the repeated findings this is upgraded to Minor.</p> |
| <p>Status of CAR:</p> | <p> <input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> Other decision (refer to description above): Upgraded to Minor 2019.4 </p> |

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| <p>Finding Number: 2018.4</p> | |
| <p>Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation</p> | |
| <p>FMU CAR/OBS issued to (when more than one FMU):</p> | |
| <p>Deadline</p> | <p> <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 regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify): </p> |
| <p>FSC Indicator:</p> | <p>FSC-STD-30-005, 1.4</p> |
| <p>Non-Conformity: Multiple Tax Specialist foresters were unable to demonstrate knowledge of Wisconsin State BMPs when interviewed by auditors specifically related to practices and requirements for water bar installations. Furthermore, foresters interviewed did not have access to, or a copy of, Wisconsin BMPs for Water Quality in the field (none had copies in trucks or on phones except the Group Manager). When requested, foresters were not able to provide copies of BMP manuals to auditors in the field such that it was unclear how foresters would check timber sales set up for inspecting Cutting Notices or for inspecting Cutting Reports to make determinations of conformance in the field by visual inspections.</p> | |
| <p>Corrective Action Request (or Observation): The Group entity must define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable FSC standards. Programs must include effectiveness of training</p> | |

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| such as when working with landowners who must ensure harvest activities meet BMP requirements or when inspecting sites for BMP conformance. Effectiveness may be proven by demonstration of knowledge verbally or in the field or by otherwise producing relevant information in the field where BMP determinations are made. | |
| FME response <i>(including any evidence submitted)</i> | BMP field manuals have been provided to all staff who either were missing one or had one that needed to be replaced. BMPs for water quality and the TLS authorities to enforce them have been reviewed at several meetings (both at the section level and in individual teams). New staff are sent to internal BMPs for water quality course as it is offered (typically 1-2 times per year). As the TLS continues to define the program strategy, a comprehensive continuing education program will be initiated that will include BMPs for water quality specific to each region. |
| SCS review | All foresters included in the 2019 audit had ready access to Water Quality BMP manual, some both physical bound copies as well as pdf copies on electronic devices. MFL Forest Tax Law Specialists (FTLS) and Team Leaders interviewed in the field demonstrated knowledge of specific BMP requirements and ability to quickly look up BMP information not readily at hand. Awareness of training content was confirmed by interviews with FTLS, although some foresters may not have formal BMP trainings for over a year. All FTLS demonstrated knowledge sufficient to justify closure of this observation. |
| Status of CAR: | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above) |

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| Finding Number: 2018.5 | |
| 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/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input checked="" type="checkbox"/> Other deadline (specify): <i>within 12 months or next regularly scheduled audit</i> |
| FSC Indicator: | FSC-STD-30-005, 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. |
| Non-Conformity (or Background/ Justification in the case of Observations): In interviews with multiple DNR staff auditors were informed that the DNR MFL website is the primary resource for landowners regarding requirements of the program. However, the “MFL Handbook”, which is chapter 21 of the Forest Tax Law Handbook, available on the MFL website is from the 2008 version of the Handbook when the most recent version is 2017, therefore the MFL Handbook available to landowners is out of date. Evidence: MFL Certified Group Chapter of the Forest Tax Law Handbook [PDF], <https://dnr.wi.gov/topic/TimberSales/mfl.html> | |
| Corrective Action Request (or Observation): The Group entity management representative, Group Manager, has an overall responsibility and authority for the Group entity’s compliance with all applicable requirements of this standard which includes providing up to date roles, responsibilities, and conformity requirements that must be met by landowners. | |
| FME response <i>(including any evidence submitted)</i> | The website has been updated. |

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| SCS review | The website was confirmed as updated and the most recent version of the handbook is online at, https://dnr.wi.gov/topic/ForestManagement/documents/24505.pdf . (Last accessed 11 June 2019) |
| Status of CAR: | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above) |

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| Finding Number: 2018.6 | |
| Select one: <input type="checkbox"/> Major CAR <input checked="" 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 type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify): |
| FSC Indicator: | FSC-STD-30-005, 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. |
| Non-Conformity (or Background/ Justification in the case of Observations): | |
| <p>2018: Order # 20-014-2012: Landowner did not report herbicide use. A landowner/group member during interview relayed using herbicides as allowed under the FSC US FM Standard but did not report such use because they were not aware of this responsibility of the landowner.</p> <p>During interviews group members self-described as not aware of their responsibilities for complying with some applicable FSC standard requirements. This description of landowners as being “likely unaware of responsibilities” was also described in interviews with Certified Plan Writers (CPWs), Cooperating foresters, and DNR Tax Specialist foresters. Topics for which landowners were likely to lack knowledge of their responsibilities included the following:</p> <ul style="list-style-type: none"> • Herbicide reporting , • <i>Site close-outs including BMPs, post-harvest exams</i>, • Regeneration monitoring, • Special sites protections (Archeology and RTE, as needed) (bold/italics added for emphasis) <p>2019: Evidence submitted of training for MFL forestry staff regarding herbicide reporting and other certification requirements are accepted as demonstrating their understanding of those requirements. A trifold informational pamphlet was also submitted. However, these do not demonstrate how group management expects these portions of the standard requirements will be met. There were also no documented procedures provided as to how conformance to bullet 2 above, <i>Site close-outs including BMPs, post-harvest exams</i>, will be achieved consistently under the current structure and system.</p> | |
| Corrective Action Request (or Observation): | |
| <p>The Group entity’s procedures must be sufficient to establish an efficient internal control system ensuring that all members are fulfilling applicable requirements.</p> <p><i>Note regarding herbicide reporting: Related indicator 6.6.e for FMEs requires monitoring herbicide use and the group entity has responsibilities to report summaries of such use in FSC reports. FSC accreditation standards require formal presentation of herbicide use summaries. The Group Manager has been identified as the party responsible for reporting such summaries to be included as required by FSC standards (specifically FSC-STD-20-007a). Importantly, such use cannot be monitored (per 6.6.e) nor summarized without basic reporting made by landowners.</i></p> <p>The certification group manager must ensure program procedures and control measures are effective to conformance to the requirements of the standard including corrective actions such as landowner BMP education, other collaborative educational initiatives, or appropriate monitoring systems that lead to preventive and corrective actions.</p> | |

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| FME response <i>(including any evidence submitted)</i> | 2019: Additional training has been provided to TLS staff regarding herbicide reporting requirements. The outreach initiative including the pamphlet being produced with Domtar will cover all forest certification requirements of landowners. |
| SCS review | Training records including Agenda were reviewed and were confirmed that DNR has offered appropriate training to forestry staff. The “outreach initiative” was not fully conveyed to the audit team. The trifold brochure containing generic benefits of certification was presented and reviewed but did not include educational information related to forest stewardship of lands as relevant to certification. Interviews discovered educational initiatives are generally done by Integrated Foresters and woodland owners associations, both outside of the MFL program. However, this was not presented in a comprehensive way for state-wide application for evaluation by the audit team. There is a draft Strategic document that may address some of these issues but the FSC auditing system does not allow use of draft documents as evidence. Additionally, such evidence must also be confirmed as implemented. The audit team was unable to close this Minor non-conformity and thus it is raised to a Major. |
| Status of CAR: | <input type="checkbox"/> Closed <input checked="" type="checkbox"/> Upgraded to Major CAR 2019.5 <input type="checkbox"/> Other decision (refer to description above) |

4.4 New Corrective Action Requests and Observations

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| Finding Number: 2019.1 | |
| 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 regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify): |
| FSC Indicator: | FSC US FM 6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place. |
| Non-Conformity: | |
| <p>This finding was raised from Observation 2018.1.</p> <p>2018: Auditors observed several sections of rutted roads and erosion with sediment deposition into a stream running through the harvest area (Order # 37-039-2010); no water bars had been installed. At another site, a main access haul road that was installed for a timber sale where the logging crew had pulled out of the sale in the fall. Crew was to return after oak wilt no-harvest period was done, departing for over 5 months. In the meantime, the road had washed out (erosion) on slopes greater than 45% and had no water bars installed for at least 300 feet. (Order # 27-018-2016). There were 75 sites inspected during this audit and all other sites were in conformance. Due to overall field conformance with this indicator it was determined this is a minor, isolated system breakdown rather than a fundamental failure justifying the grading of this finding as a Minor non-conformity.</p> <p>2019: The following sites had road BMP, or related Cutting Notice, issues:</p> <ol style="list-style-type: none"> Order # 36-002-2018- No use of water bars on steep haul/skid road. Sale final executed by DNR staff on 1/18/19. Order # 34-035-2014 - Erosion and main dirt road through the stand, slope 35-45 degrees with sedimentation run-off into adjacent wetland. Forester was aware of BMP requirements and described typical practice to address the issue. For this forester common practice included notifying landowner to discuss issue and potential removal from the certification group. However, the erosion was not noted on any inspection documents and there is an apparent gap in when, or if, any additional follow up would have | |

been done such that this issue would have been identified, providing opportunity for correction, outside of an external audit.

3. Order # 69-060-2012 - Cutting notice included in "BMP for Water Quality Prescription" to avoid entering the low-lying swale with heavy equipment. However, at the on-site inspection the permanent, all-season forest road crossed the swale impeding water flow and movement and resulting in sediment deposition in and outside the natural stream flow with ponding in several locations on the road.
4. Order # 21-011-2006 – Some downhill rutting present at site with no waterbars present, small amount of sediment delivery to base of hill on southern edge of stand (no receiving waterbody present). A steep historic woods road, adjacent to the stand in a degraded condition, had insufficient BMPs present. Logger applied limited BMPs to improve the degraded road (logs angled across the road), but historic & current ATV use has moved the material and nullified the BMP application.
5. Order # 21-002-2019 (21-017-1994) - Shiner Lake is adjacent to the Harvest Area. Cutting notice states that buffer of 100 ft. be applied to the lake. On-site visit showed that the buffer is less than 100' near the area that includes the camp, with harvesting occurring within 70-80' of the Lake edge for a distance of approximately 100 lineal ft.

From the 2019 external, certification sampling, 5 of 70 sites had road BMP issues representing about 7% sampling. In 2018, the result was 12% (Minor), and in 2017 certification audit sampling found BMP issues at 3% (Obs). The 2017 results were consistent with the last state-wide BMP monitoring, strictly for water quality, last done in 2015. No more recent or alternative results for the last 4 years were presented to the audit team. Given this is a repeated finding and further, interviews with CPWs included concerns expressed about lack of understanding of road BMPs, construction, and maintenance by landowners as contributing to future problems related to roads, specifically for *Wisconsin's Forestry Best Management Practices for Water Quality*, Chapters 4 (Forest Roads) and 8 (Wetlands) this Minor is upgraded to a Major.

Corrective Action Request (or Observation): Forest operations must meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place. In the absence of conformance at the operational level, or the area of forest management activity, the group management must demonstrate programmatic ability to prevent, avoid, correct or otherwise provide for continuous improvement. Examples of prevention activities may include education and/or training. Examples of avoidance activities may include communication about requirements and consequences. Corrections must include monitoring to detect, and procedures for conducting necessary corrections.

FME response
(including any evidence submitted)

SCS review

Status of CAR:

- Closed
- Upgraded to Major
- Other decision (refer to description above)

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| Finding Number: 2019.2 | |
| Select one: <input type="checkbox"/> Major CAR <input checked="" 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 type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify): <i>12 months or next regularly scheduled audit</i> |
| FSC Indicator: | 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. |
| <p>Non-Conformity (or Background/ Justification in the case of Observations): This was raised from Observation 2018.2, see above for more detail. 2018: 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, instances of incomplete or insufficient water bars, inadequate gravel installed at road crossings of small intermittent streams, and minor soil compaction. These roads were nonetheless in conformance justifying this finding as an observation. 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, and 37-086-2012. Detailed information for these sites are included in Section 2.1 of the 2018 audit report. 2019: Additional sites were observed with road impact issues. Landowner and CPW interviews confirmed existing gaps in education, implementation and monitoring of BMP requirements including related to road maintenance and construction. See Major CAR 2019.1 for site details of the five sites cited with road BMPs issues. Additionally, interviews with CPWs included concerns expressed about lack of understanding of road BMPs, construction, and maintenance by landowners as contributing to future problems related to roads, specifically for <i>Wisconsin's Forestry Best Management Practices for Water Quality</i>, Chapters 4 (Forest Roads) and 8 (Wetlands). The current understanding of roles and responsibilities for meeting this CAR is that it is the responsibility of the landowner. This is based on the Forest Management Plan language and <i>Specific group member duties</i>, as included on 21-6 of the <i>State of Wisconsin DNR, Forest Tax Law Handbook 2450.5</i>. Responsibility for carrying this out may be transferred or assumed by CPWs, or assistance in evaluating this may be requested of DNR forestry staff by checkbox in the Cutting Notice or Cutting Report. This understanding was confirmed by MFL forestry staff and CPWs. However, landowners still appear to not understand the road BMPs, particularly for water quality, as stated in the Managed Forest Law Forest Management Plans, section entitled, "<i>Best Management Practices for Water Quality (BMPs)</i>". Interviews with MFL Forestry Tax Law Specialists (FTLS) and CPWs confirmed some are covering BMP monitoring aspects with landowners during the Forest Management Plan approval phase. Post-harvest monitoring is not consistently being done, nor have preventative educational sessions been presented as evidence to address this from past findings such that this finding is raised from an Observation to a Minor non-conformity. Additionally, the audit team has identified a gap in monitoring performance in that related post-harvest monitoring is not consistently being done, nor have preventative educational sessions been presented as evidence to address this from past findings. In the past this indicator requirement may have been met by activities of the DNR staff, may have occasionally be done by CPW, or may have been done by the landowner. However, there appears to be a gap for monitoring BMP compliant road maintenance and construction and other post-harvest monitoring for remediation in non-compliant situations. Thus, there appears to be gaps in monitoring, see related new finding Minor 2019.7.</p> | |
| Corrective Action Request (or Observation): | |

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| WIDNR must act to ensure certification group member transportation systems, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, are 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 safeguarding against erosion to avoid and minimize sediment discharge to streams and other waterbodies in accordance with MLF FMP requirements for BMPs which serves, in part, to meet this indicator. | |
| FME response <i>(including any evidence submitted)</i> | |
| 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> |

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| Finding Number: 2019.3 | |
| 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/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input checked="" type="checkbox"/> Other deadline (specify): <i>Due in 12 months or next regularly scheduled audit</i> |
| FSC Indicator: | 6.7.a. The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills. |
| Non-Conformity (or Background/ Justification in the case of Observations): Unable to evaluate this indicator due to lack of inspection of harvest operator on-site during the audit. Evaluation of this indicator requires observation of a forest harvest operations which was unavailable this year due to extremely wet weather. This must be evaluated in 2020. | |
| Corrective Action Request (or Observation): Group manager must arrange inspection of active forest harvesting operations in 2020 to evaluate this indicator. | |
| FME response <i>(including any evidence submitted)</i> | |
| 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: 2019.4 | |
| Select one: <input type="checkbox"/> Major CAR <input checked="" 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 type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify): |
| FSC Indicator: | 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>Non-Conformity: This finding has been upgraded from Observations made in 2018 and 2017, see Observation 2018.3, above, for those details. During the 2019 audit the audit team discovered stands that did not match the FMP, nor were silvicultural objectives consistent with FMP stand type or conditions. An example is MFL 36-014-1999-Stand 4, 15 acres of an upland hardwoods forest cover type. Approximately 7 acres of the southern part of stand had been harvested for oak release around 2014/2015 by the landowner. The stand description on the ground did not match management plan documents. There was no evidence of updating in the FMP for the of oak release observed in field maps/documents and no delineation of stand 4, based on landowner action to release oaks. In another example, MFL 69-116-2013- Stand P2 was managed by an intermediate red pine thinning. Basal Area checks determined post-harvest at about 90-100 square feet per acre. The final harvest was signed January 2019. In this case, the volume on the ground did not match volumes within the Land Exam information which was last updated January 2016. Given past findings and new input from CPWs and MFL staff regarding inability to update management plans for forest inventory after harvesting (alterations) and interviews indicating that post-harvest checks are not being done consistently or in a timely manner, this is upgraded from an Observation to a Minor.</p> <p>Additionally, this is determined by the audit team to be related to overall issues with monitoring following harvests done on MFL member properties. See related new findings for monitoring under Minor 2019.7.</p> | |
| <p>Corrective Action Request (or Observation): Actions undertaken on the FMU must be consistent with the management plan, updated in management plans in a timely fashion, and be consistent towards achieving the stated goals and prescribed objectives of the plan. MFL as group manager must demonstrate an effective system that updates harvesting alterations in the compendium of documents that comprise MFL FMPs.</p> | |
| FME response <i>(including any evidence submitted)</i> | |
| 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: 2019.5 | |
| 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 regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify): |
| FSC Indicator: | FSC-STD-30-005, 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. |
| Non-Conformity (or Background/ Justification in the case of Observations): | |
| <p>This was upgraded from Minor 2018.6</p> <p>2018: Order # 20-014-2012: Landowner did not report herbicide use. A landowner/group member during interview relayed using herbicides as allowed under the FSC US FM Standard but did not report such use because they were not aware of this responsibility of the landowner. During interviews group members self-described as not aware of their responsibilities for complying with some applicable FSC standard requirements. This description of landowners as being “likely unaware of responsibilities” was also described in interviews with Certified Plan Writers (CPWs), Cooperating foresters, and DNR Tax Specialist foresters. Topics for which landowners were likely to lack knowledge of their responsibilities included the following: • Herbicide reporting • <i>Site close-outs including BMPs, post-harvest exams</i> • Regeneration monitoring • Special sites protections (Archeology and RTE, as needed). (Bold/italics added for emphasis.)</p> <p>2019: Response to the above Minor CAR included training records for TLFS training agendas were reviewed and were confirmed that DNR has offered appropriate training to forestry staff. The evidence that was submitted of training for MFL forestry staff regarding herbicide reporting and other certification requirements were accepted as demonstrating TLFS’s understanding of those requirements. A trifold, generic program-benefit informational pamphlet for landowners was also submitted but did not include related information to the topic areas. These actions do not demonstrate how the certification group management system expects these portions of the standard requirements will be met.</p> <p>The MFL program did not demonstrate the effectiveness of the monitoring nor did MFL identify to the audit team the training needs for landowners being addressed to meet the identified gaps in performance related to BMPs and FMP implementation of mandatory practices, whether done directly by the MFL program or in collaboration or cooperation with other DNR divisions or programs, the Woodland Owners Associations, or other entities that offer training opportunities to landowners.</p> <p>The MFL program addressed most of the bullet points related to landowner responsibilities. However, the second bullet from the 2018 finding lists: <i>Site close-outs including BMPs, post-harvest exams</i>. The 2019 audit confirmed that related monitoring and post-harvest exams are not being consistently done, at times even when requested by landowners via (per landowner and CPW interviews). Additionally, no evidence was provided of landowner education or training addressing these topic areas. Thus, this Minor could not be closed and has been upgraded to a Major.</p> | |
| Corrective Action Request (or Observation): | |
| <p>The indicator requirement is, “The Group entity’s procedures must be sufficient to establish an efficient internal control system confirming that all members are fulfilling applicable requirements.” This includes procedures for effective internal and external monitoring and training or informational programs to accommodate topics relevant to landowners. The certification program must ensure existing procedures and monitoring, as identified in the WI Tax Law Handbook to aid landowners or certification group members in conformance to the requirements are planned and scheduled to be implemented. The WI MFL program must conduct a root cause analysis (RCA) to</p> | |

| | |
|---|---|
| identify gaps in the program areas related to monitoring Order numbers with harvest activities, develop an action plan, and schedule to implement corrections to areas identified for improvement in the RCA. | |
| FME response <i>(including any evidence submitted)</i> | |
| 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: 2019.6 | |
| 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/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify): |
| FSC Indicator: | FSC-STD-30-005, 5.1 The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include: ii. Any records of training provided to staff or Group members, relevant to the implementation of this standard or the applicable Forest Stewardship Standard; |
| Non-Conformity (or Background/ Justification in the case of Observations): DNR is offering and completing training sessions for forestry staff and was able to confirm verbally attendance by all 34 Tax Law Forestry Specialists, team leaders, and administrative staff for the Agendas and Training sessions provided for review, which was accepted. | |
| Corrective Action Request (or Observation): Record keeping of these trainings could be improved by documentation of those attending. | |
| FME response <i>(including any evidence submitted)</i> | |
| SCS review | |
| Status of CAR: | <input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above) |

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|--|---|
| Finding Number: 2019.7 | |
| Select one: <input type="checkbox"/> Major CAR <input checked="" 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 type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify): |
| FSC Indicator: | FSC-STD-30-005, indicator 5.1.vi. (see also FSC-US indicators 6.5.b and 6.5.d, 8.2.d.1). 5.1.vi. The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include: 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 noncompliance; |
| Non-Conformity (or Background/ Justification in the case of Observations): Review of internal audits from 2017/2018 did not include evidence of implementation of corrections, corrective actions, or preventive actions. Review of the 2018/2019 did include corrective actions for one identified site issue but the other with identified Minor non-conformity did not describe the planned or implemented corrections. Given lack of evidence for corrections and non-conformities for indicators under 6.5.b (2019.1) and 6.5.d (2019.2) and additional related requirements under 8.2.d.1, this was identified as applicable for group management under this clause. This program has undergone substantial and significant restructuring and personnel changes over the last several years such that some development and articulation for MFL forestry staff work prioritization and collaborations across multiple agencies is still in progress. The overall system and structure of the State of Wisconsin, Managed Forest Law program is functional with competent and qualified staff justifying the grading of this finding as a Minor non-conformity. | |
| Corrective Action Request (or Observation): Group management must maintain records demonstrating the implementation of any internal control or monitoring systems. Such records shall include records of internal inspections, non-conformances identified in such inspections, actions taken to correct any such nonconformances. The performance of internal audits must include evidence of corrections, implementation and their use as part of continuous improvements to the program. | |
| 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) |

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 FME 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).

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.

5.1 Stakeholder Groups Consulted

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. Stakeholder groups who are consulted as part of the evaluation include FME management and staff, consulting foresters, contractors, lease holders, adjacent property owners, local and regionally-based social interest and civic organizations, purchasers of logs harvested on FME forestlands, recreational user groups, tribal members and/or representatives, members of the FSC National Initiative, members of the regional FSC working group, FSC International, local and regionally-based environmental organizations and conservationists, and forest industry groups and organizations, as well as local, state, and federal regulatory agency personnel and other relevant groups.

5.2 Summary of Stakeholder Comments and Evaluation Team Responses

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.

| <input type="checkbox"/> <i>FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual evaluation.</i> | |
|---|--|
| Stakeholder Comment | SCS Response |
| A Consulting Plan Writer (CPW) noted road issues where landowner placements conflicted with Wisconsin BMPs for Water Quality. The forester would like to see landowners be | This issue was evaluated in 2019. The audit team noted BMP issues on several sites inspected during the audit and noted potential for improvement of landowner education for multiple topic areas related to management of private forestry lands. See CARs 2019.1, 2019.2 and 2019.5. |

| | |
|--|---|
| <p>offered more training and information about how to design and construct roads.</p> | |
| <p>Several CPWs commented or had issues with MFL not conducting post-harvest inspections even when a CPW has requested it. One CPW related concerns about MFL staff workloads related to non-completion of post-harvest inspections.</p> | <p>This issue was evaluated during the audit, see Minor CAR 2019.2.</p> |
| <p>A landowner relayed that they used the MFL website to look up information about invasives after attending a woodland owners workshop. They also mentioned they found other helpful resources on the website.</p> | <p>Noted as evidence of conformity. The DNR website, https://dnr.wi.gov/topic/Invasives/, offers up-to-date and scientifically sound information about invasive species. Landowners can learn about invasive species, how to report sightings, order publications, possible actions to take for invasives and offers a variety of other resources. The DNR offers forestry related topics, beyond forest invasive species on the website at this location, https://dnr.wi.gov/topic/forestry.html. Identifying and treating invasive species is a required component of the FSC standard under indicator 6.3.h, "The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control <i>invasive species</i>." This serves as evidence of conformity to Indicator 4.1.f, "Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management." Finally, the DNR website offers general landowner assistance at this website, https://dnr.wi.gov/topic/Landowner/</p> |
| <p>A CPW reported being very pleased with how fast turn-around time is for NHI checks.</p> | <p>Noted as evidence of conformity. Checking for natural heritage features such as rare, threatened, and endangered species; archaeological features; and other cultural heritage features are required components for forest management planning and activities under the FSC-US forest management standard. Applicable indicators and criteria under the FSC-US FM standard includes: indicator 6.1.a, criterion 6.2, 6.3.a.2, 7.1.e, 8.2.c, and 9.1.a (Rare, threatened and endangered species);</p> |
| <p>The WISFRS program is very helpful and CPW appreciates the continuous improvements.</p> | <p>Noted as evidence of conformity. Extensive review of the WISFRS online program was conducted as part of the audit. The audit team concurs that the system is relatively unique in the country by providing access and a full forest management planning program to private landowners.</p> |
| <p>An industry forestry expressed satisfaction with changes to the Cutting Notice system which</p> | <p>Noted as evidence of conformity.</p> |

| | |
|--|--|
| <p>now allows qualified persons to issue. They note it has greatly streamlined the process for approved forest management plans and results in more forest management being implemented.</p> | |
| <p>A landowner comments that the DNR forestry staff (MFL or Private Lands foresters) are very helpful and are my first call when I need help.</p> | <p>Noted as evidence of conformity under indicator 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.”</p> |
| <p>A landowner requested a chainsaw safety course.</p> | <p>The MFL forestry staff do not conduct chainsaw safety courses for the general public. Wisconsin offers a premier logger training program, Forest Industry Safety and Alliance, Inc, or FISTA, who offers chainsaw training for logging professionals and also offers beginning chainsaw training courses. More information may be found here https://www.fistausa.org/fista/Chainsaw_Training.asp.</p> |

6. Certification Decision

| | |
|---|--|
| <p>The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual evaluation team recommends that the certificate be sustained, subject to subsequent annual evaluations and the FME’s response to any open CARs.</p> | <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> |
| <p>Comments: The audit team found some aspects of conformance to the forest management and group management standards difficult to evaluate given the continued flux in prioritization of duties for DNR forestry staff. For Principle 6 certain indicators were difficult to evaluate as no harvest operators were observed in the field.</p> | |

7. Annual Data Update

| | |
|---|---|
| <input type="checkbox"/> No changes since previous evaluation. | |
| <input type="checkbox"/> Information in the following sections has changed since previous evaluation. | |
| <input type="checkbox"/> Name and Contact Information <input type="checkbox"/> FSC Sales Information <input checked="" type="checkbox"/> Scope of Certificate <input type="checkbox"/> Non-SLIMF FMUs <input type="checkbox"/> Social Information | <input checked="" type="checkbox"/> Pesticide and Other Chemical Use <input type="checkbox"/> Production Forests <input type="checkbox"/> FSC Product Classification <input type="checkbox"/> Conservation & High Conservation Value Areas <input type="checkbox"/> Areas Outside of the Scope of Certification |

Name and Contact Information

| | |
|---------------------------------|--|
| <p>Organization name</p> | <p>Wisconsin Department of Natural Resources</p> |
| <p>Contact person</p> | <p>Katharine Haan</p> |

| | | | |
|----------------|--|------------------|------------------------------|
| Address | 110 S. Neenah Ave. Sturgeon Bay, WI 54235 | Telephone | (608) 640-9457 |
| | | Fax | |
| | | e-mail | katharine.haan@wisconsin.gov |
| | | Website | dnr.wi.gov |

FSC Sales Information

| | | | |
|------------------------|--|------------------|-------------------------------|
| FSC salesperson | Sabina Dhungana | | |
| Address | 101 S. Webster St. FR/4 PO Box 7921 Madison, WI 53707-7921 | Telephone | (608) 220-4531 |
| | | 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 (Mega Group) | |
| # Group Members (if applicable) | 37,443 Members (MFL Owners) | |
| Number of FMU's in scope of certificate | 46,748 FMUs (MFL orders) | |
| Geographic location of non-SLIMF FMU(s) | <i>Latitude & Longitude: Various, see records in Appendix Group Members</i> | |
| 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 | 2,584,493 | |
| state managed | | |
| community managed | | |
| Number of FMUs in scope that are: | | |
| less than 100 ha in area | 100 - 1000 ha in area | |
| 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 | | |
| are between 100 ha and 1000 ha in area | | |
| meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs | 2,584,493 | |
| Division of FMUs into manageable units: | | |
| Managed Forest Law Order Numbers (i.e. MFL orders) are the FMUs level management units. | | |

Social Information

| | | |
|---|-------------------|----------|
| Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender): | | |
| male workers: 37 | female workers: 7 | |
| Number of accidents in forest work since previous evaluation: | Serious: 0 | Fatal: 0 |

Pesticide and Other Chemical Use

| <input type="checkbox"/> FME does not use pesticides. | | | |
|---|-------------------------------------|---|-------------------------------------|
| Commercial name of pesticide / herbicide | Active ingredient | Total area treated since previous evaluation (ac) | Reason for use |
| Roundup/Accord | Glyphosate | 283 acres | Site prep; invasive species control |
| Dicamba L | Dicamba | 197 acres | Invasive species control |
| Garlon/Tahoe | Triclopyr | 863 acres | Release; invasive brush control |
| Transline | Clopyralid | 53 acres | Release |
| Escort/Patriot | Metsulfuron methyl | 40 acres | Site prep |
| Oust/Spyder | Sulfometuron methyl | 106 acres | Site prep; release |
| Hi-Dep/Patron | 2,4-D | 59 acres | Site prep; invasive species control |
| Cellutreat | Disodium Octoborate Tetrahydrate | 209 acres | HRD prevention |
| RotstopC | Plebiopsis gigantea strain VRA 1992 | 509 acres | HRD prevention |
| Sporax | Borax | 366 acres | HRD prevention |

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) | 2,661,967 |
| 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 Note: Total includes red pine, white spruce, and 2/3 jack pine. | 170,050 |
| 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 |
| Shelterwood | 619,049 |
| Other: | 102,731 |
| Uneven-aged management | |

| | |
|--|---|
| Individual tree selection | 538,226 |
| Group selection | 346,961 |
| Other: | 619,049 |
| <input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.) | |
| 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 | We don't collect data on NTFPs on private lands. |
| Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name (Common/ Trade Name)</i> | |
| Aspen/Popple: | <i>Populus tremuloides</i> <i>Populus grandidentata</i> |
| Balsam poplar | <i>Populus balsamifera</i> |
| Bottomland hardwoods: | |
| | <i>Populus deltoides</i> |
| Eastern Cottonwood | |
| Swamp white oak | <i>Quercus bicolor</i> |
| Siver maple | <i>Acer saccharinum</i> |
| American elm | <i>Ulmus americana</i> |
| River birch | <i>Betula nigra</i> <i>Fraxinus pennsylvanica</i> |
| Green ash | |
| White birch | <i>Betula papyrifera</i> |
| Northern white cedar | <i>Thuja occidentalis</i> |
| Central hardwoods: | |
| | <i>Quercus alba</i> |
| White oak | |
| 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> |

| | |
|--------------------------------|-------------------------|
| Balsam fir | <i>Abies balsamea</i> |
| Eastern hemlock | <i>Tsuga canadensis</i> |
| Miscellaneous conifers: | |
| Scotch pine | <i>Pinus sylvestris</i> |

FSC Product Classification

| Timber products | | |
|-------------------------------|----------------------------|-----------------------------|
| Product Level 1 | Product Level 2 | Species |
| W1 Rough Wood | W1.1 Roundwood (logs) | All above |
| W1 Rough Wood | W1.2 Fuel Wood | All above |
| W1 Rough Wood | W1.3 Twigs | All above |
| W3 Wood in chips or particles | W3.1 Wood chips | All above |
| Non-Timber Forest Products | | |
| Product Level 1 | Product Level 2 | Product Level 3 and Species |
| N6 Plants and parts of plants | N6.3 Whole trees or plants | Christmas trees |
| | | |

Conservation and High Conservation Value Areas

| Conservation Area | Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac |
|---|---|
| Total amount of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).* | 0 |

**Note: Total conservation and HCV areas may differ since these may serve different functions in the FME’s management system. Designation as HCV may allow for active management, including commercial harvest. Conservation areas are typically under passive management, but may undergo invasive species control, prescribed burns, non-commercial harvest, and other management activities intended to maintain or enhance their integrity. In all cases, figures are reported by the FME as it pertains local laws & regulations, management objectives, and FSC requirements.*

| High Conservation Value Forest / Areas | | | Units: <input type="checkbox"/> ha or <input type="checkbox"/> 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' | | | 0 |

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

| | | |
|--|---|--|
| <input type="checkbox"/> <i>N/A – All forestland owned or managed by the applicant is included in the scope.</i> | | |
| <input type="checkbox"/> <i>Applicant owns and/or manages other FMUs not under evaluation.</i> | | |
| <input checked="" type="checkbox"/> <i>Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.</i> | | |
| Explanation for exclusion of FMUs and/or excision: | Agricultural food plots are excised. 3833 acres are excised (food plots @ 1 acre each). | |
| Control measures to prevent mixing of certified and non-certified product (C8.3): | No forest products are produced on these agricultural acres. | |
| 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 type="checkbox"/> ac) |
| | | |
| | | |

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 establish 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.

| 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) |
|---|---|--|---|
| All sites selected are SLIMF and listed in the Evaluation itinerary | | | |
| | | | |
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Appendix 2 – Staff and Stakeholders Consulted

Individual names of stakeholders are not listed in this report (See FSC-INT-STD-20-007a 02). However, SCS maintains records of names and contact information for FSC inspection as required. Any names listed in this report are with express permission of the listee.

The audit team interviewed WI DNR staff, WI FML staff, academic individual, landowners, CPWs, loggers, and other contractors during the course of this audit.

Appendix 3 – Additional Evaluation Techniques Employed

- None.
- Additional techniques employed (*describe*):

Appendix 4 – Required Tracking

Pesticide Derogations

- There are no active pesticide derogations for this FME.

Progressive HCVF Assessments

- FME does not use partial or progressive HCVF assessments.

Appendix 5 – Detailed Observations

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| Criteria required by FSC at every surveillance evaluation (<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 checked="" 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 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>): |

Requirements Reviewed in Annual Evaluation

| Evaluation Year | Requirements Reviewed (FSC P&C Reviewed, FM/COC Indicators, Trademark Indicators, Group Standard Indicators, etc.) |
|-----------------|--|
| 2018 | All – (Re)certification Evaluation |
| 2019 | FM: P1, P6; FSC Trademark -all, FSC Group Standard: 1.4, C2, C3, C8 |
| 2020 | |
| 2021 | |
| 2022 | |

The acronyms below apply to all tables in Appendices 5 through 8.

C= Conformance with Criterion or Indicator

NC= Nonconformance with Criterion or Indicator

NA = Not Applicable

NE = Not Evaluated

| REQUIREMENT | C/NC | COMMENT/CAR |
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| 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 | |
| 1.1.a Forest management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and <i>administrative requirements</i> (e.g., regulations). Violations, outstanding complaints or investigations are provided to the <i>Certifying Body</i> (CB) during the annual audit. | C | Verified conformance at all MFL Properties inspected during the 2019 audit. Beginning July 1, 2017, WDNR implemented a new Tax Law Section model developed during a prior DNR Alignment process. The revised Tax Law Section uses 4 geographic teams to administer MFL and provide customer service across the state. The new section includes Tax Law Forestry Specialists, Tax Law Administration Specialists and 4 Team Leaders that focus |

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| | | <p>exclusively on the MFL & FCL tax law programs, provide increased knowledge and program proficiency through specialization. The new section also includes 4 Program Specialists, (Compliance, Operations, Administration Coordinator, Policy Specialist (new hire), 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 Notices and Reports • MFL Stewardship Plans • WI DNR Forest Tax Law Handbook, online, see closure of CAR 2018.5 for link. • WI DNR Silviculture Handbook, http://dnr.wi.gov/topic/ForestManagement/silviculture.html • WI DNR Forest Management Guidelines • WI DNR Private Forestry Handbook (2470.5), http://dnr.wi.gov/topic/ForestManagement/documents/24705.pdf • Public Forest Lands Handbook, 2460.5, http://dnr.wi.gov/topic/ForestManagement/documents/24605.pdf |
| <p>1.1.b To facilitate legal compliance, the <i>forest owner or manager</i> ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.</p> | <p>C</p> | <p>DNR addresses this requirement through training opportunities and adherence to procedures described in handbooks. Training includes:</p> <ul style="list-style-type: none"> • Cooperating Foresters are required to complete 16 hours of training per year. • Certified Plan Writers (CPWs) must meet qualifications and also undergo training updates each year (last update done spring 2018). • Through FISTA, DNR provides 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. • Mills, state, and counties all require training through FISTA. |
| <p>C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</p> | <p>C</p> | |
| <p>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.</p> | <p>NA</p> | <p>All group members qualify as SLIMFs.</p> |
| <p>FF 1.2.a: Low risk of negative social or environmental impact.</p> | <p>C</p> | <p>DNR confirms by examining landowner production reports (Cutting Reports). Production reports are legislatively required. Register deeds notifies DNR of delinquent taxes, MFL advises landowner of any delinquency.</p> |
| <p>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.</p> | <p>C</p> | |

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| 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 | No evidence indicating non-compliance was discovered during the audit. This has been determined to be a 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 | No conflict between laws, regulations, and the FSC P&C were identified. Responsible DNR staff confirmed in interview knowledge of requirement to notify CB should such a conflict arise. |
| C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities. | C | |
| 1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest Management Unit</i> (FMU). | C | Landowners reported active management and monitoring for unauthorized activities including timber theft, trash dumping, unlawful trespass, recreation damage and so on. When issues related to property boundaries are identified the Specialist will refer landowners to other resource professional (Certified Surveyor, Cooperating Forester) as needed/appropriate. |
| 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 2019 audit. Confirmed adequate boundary marking at all properties reviewed. Interviews with landowners indicated that illegal/unauthorized activities were not an issue of significant concern and were pursued with local law enforcement if there was concern. Landowners are provided training opportunities through Wisconsin Woodland Owners association (WWOA) regarding safety and health concerns. Examples include identification and procedures for identifying illegal drugs. Offer trainings in first aid and safety. CDC education on Lyme’s disease. “Learn about your Land series” – DNR pays UW system extension, extension to provide tours/training for identified counties. These may be viewed at woodlandinfo.org . For example, Forest Planning, Foresters – roles, tree id, harvest management. After 6 sections offered a 1:1 meeting with DNR forester on their land. |
| C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria. | C | |
| 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 | C | Partial certification is covered in the Forest Tax Law Handbook (Chapter 21) |

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| (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. | | |
| 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 | WI DNR staff have consistently communicated plans for significant changes or notified SCS in a timely manner for those changes. |
| Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established. | | |
| C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated. | NE | |
| C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies. Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all residents and property owners of the relevant jurisdiction. | NE | |
| C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified. | C | |
| 2.3.a If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes. FF Indicator: Low risk of negative social or environmental impact. | C | The group manager does not become involved in disputes over tenure or use rights unless there is an enforcement issue over boundaries such as unreported land sales or false reporting of acreage. The group manager reviews tax records on an annual basis to verify any changes in ownership. |
| 2.3.b The forest owner or manager documents any significant disputes over tenure and use rights. FF Indicator: Low risk of negative social or environmental impact. | C | No group members or consulting foresters reported any disputes over tenure and use rights during interviews. |
| P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected. | | |

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| NE | | |
| Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities. | | |
| C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services. | NE | |
| C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families. | C | |
| 4.2.a The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1). FF Indicator: Low risk of negative social or environmental impact. | C | This indicator continues to be low risk of negative impact. DNR provides information on applicable laws and regulations on health and safety in the Timber Sale Handbook and Private Forestry Handbook. DNR staff is required to wear safety glasses, helmet and hi-vis vested provided at DNR expenses to be used as required by procedures. DNR became an enterprise agency for fleet management enabling access to reliable vehicle transport in sometimes remote and rugged terrain. |
| 4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements. | C | DNR provides information on applicable laws and regulations on health and safety in the Timber Sale Handbook and Private Forestry Handbook, including basic contractual requirements. Contract templates were reviewed and confirmed as containing relevant safety language. |
| 4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan. FF Indicator: Low risk of negative social or environmental impact. | C | According to DNR staff and certified plan writers interviewed, most landowners contract with local loggers and other service providers that have reputations for good work. No safety issues were reported and no significant residual stand damage was observed on harvest or prescribed burn sites visited during the audit, which indicates that there is still low risk of negative impacts for this indicator. Notably, a high percentage of harvesters or foremen used on MFL sites were trained through FISTA. |
| C4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO). | NE | |
| C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations. | C | |
| 4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on: Archeological sites and sites of cultural, historical and community significance (on and off the FMU; Public resources, including air, water and food (hunting, fishing, collecting); Aesthetics; | NA | MFL consists entirely of SLIMF FMUs. |

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| <p>Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; Community economic opportunities; Other people who may be affected by management operations. A summary is available to the CB.</p> | | |
| <p>FF Indicator 4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations.</p> | C | <p>Social impact assessments are covered by the following WI DNR procedures and guidance documents that are included as components of the MFL management system:</p> <ul style="list-style-type: none"> Department of Natural Resources Division of Forestry Strategic Direction, 2017–2022, https://dnr.wi.gov/topic/forestPlanning/documents/strategicDirection2017.pdf. <p>Historically significant sites and archeological sites are identified using the Archeological and Historical Database Public Resources (primarily water) are identified and protected through BMPs for Water Quality. Aesthetics are covered under chapter 4 of Forest Management Guidelines.</p> |
| <p>4.4.b The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities. FF Indicator: Low risk of negative social or environmental impact.</p> | C | <p>Interviews with cooperating foresters, CPWs, and group members confirmed that most maintain regular communication with neighbors over any timber harvests close to boundaries and that some of them even send letter to neighbors prior to harvesting. Low risk re-confirmed in 2019.</p> |
| <p>4.4.c People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.</p> | C | <p>See 4.4.b. Before a timber harvest can occur, there is a 30-day period for DNR to review the harvest plan, when legislatively required, that is described in a Cutting Notice. Such a review includes elements listed in 4.4.a to ensure that adverse effects do not occur.</p> |
| <p>4.4.d For <i>public forests</i>, consultation shall include the following components: Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; An accessible and affordable appeals process to planning decisions is available. Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p> | NA | <p>MFL does not include any publicly owned or managed FMUs; all ownership and management is considered private.</p> |
| <p>C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of</p> | NE | |

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| <p>local peoples. Measures shall be taken to avoid such loss or damage.</p> | | |
| <p>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.</p> | | |
| <p>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.</p> | <p>NE</p> | |
| <p>C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.</p> | <p>NE</p> | |
| <p>C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</p> | <p>NE</p> | |
| <p>C5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p> | <p>NE</p> | |
| <p>5.6.a In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.</p> <p>The sustained yield harvest level calculation for each planning unit is based on: documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; mortality and decay and other factors that affect net growth; areas reserved from harvest or subject to harvest restrictions to meet other management goals; silvicultural practices that will be employed on the FMU; management objectives and desired future conditions. The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.</p> | <p>NA</p> | <p>MFL only consists of SLIMF group members.</p> |
| <p>FF Indicator 5.6.a On family forests, a sustained yield harvest level analysis shall be completed. Data used in the analysis may include but is not limited to:</p> <ul style="list-style-type: none"> - regional growth data; - age-class and species distributions; - stocking rates required to meet management objectives; - ecological and legal constraints; - empirical growth and regeneration data; and, - validated forest productivity models. | <p>C</p> | <p>On most MFL properties, a land exam is conducted to determine current species composition, age classes, and stocking levels and use this information to classify stands. Volume, basal area, site index, and trees per acre are estimated for each stand. Soil information is included for each stand. The DNR or cooperating service provider then use this information to create mandatory practices intended to meet harvest, growth, and regeneration objectives while considering constraints based on productivity, protected sites, and wildlife goals as described in the property-specific management plan. Prescriptions are often based on the DNR’s Silvicultural Handbook, which is updated frequently and based on validated forest productivity models throughout the</p> |

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| | | <p>state. Pre- and post-harvest timber cruises, when done, ensure that growth and regeneration assumptions are consistent with validated forest productivity models. This is an area where examination should be done in future years, e.g. 2019, evaluating recent changes in post-harvest inspections/monitoring.</p> <p>Harvest timing is estimated via projected growth data (based on growth and yield data from FIA and the State of Wisconsin) and only occurs if estimated volume is available for harvest. Because of this type of regulation system, there is no need for each individual small parcel in the MFL to have a sustained yield harvest level. Other DNR requirements such as BMPs, NHI searches, Ecological Landscape considerations, Invasive BMPs ensure ecological and legal constraints are factored into harvest levels for each property.</p> |
| 5.6.b Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level. | NA | MFL only consists of SLIMF group members. |
| FF Indicator 5.6.b. On family forests, harvest levels and rates do not exceed growth rates over successive harvests, contribute directly to achieving desired future conditions as defined in the forest management plans, and do not diminish the long term ecological integrity and productivity of the site. | C | <p>On MFL properties observed in 2019 there were regeneration harvests for aspen, oak, maple, and pine but the predominant cover types observed were northern and central hardwoods managed by thinnings. Through retention of larger trees for wildlife and future timber value while commonly allowing for regeneration patch cuts, there is very low risk that harvest rates exceed growth rates. Thinnings may occur three-five times over the lifetime of a typical stand based on site productivity and current markets for harvested material. In some cases, oak stands are regenerated using clearcuts or shelterwood systems at the end of the rotation to start another cycle of thinnings.</p> <p>Regulation system implemented as described in 5.6.a ensures harvest levels are sustained over successive harvests.</p> |
| 5.6.c Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives. | C | The timber types and stands visited in 2019 were being harvested under silvicultural systems and rates that will result in sufficient regeneration of targeted species. |
| 5.6.d For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem. | NA | <p>There are no NTFPs harvested in significant or commercial quantities that would lead to significant impact on timber and other forest resources, as confirmed through interviews with MFL group members, DNR foresters, and other stakeholders.</p> <p>The most common NTFP that could affect timber production objectives is tapping for maple sugar resources. This is not practiced across the entire group and usually only on small parcels within a given MFL property, thus ensuring that impacts to timber production remain localized.</p> |
| <p>P6 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.</p> | | |

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| <p>C6.1. 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.</p> | <p>C</p> | |
| <p>6.1.a. Using the results of credible scientific analysis, best available information (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes:</p> <ol style="list-style-type: none"> 1) Forest community types and development, size class and/or successional stages, and associated natural disturbance regimes; 2) Rare, Threatened and Endangered (RTE) species and rare ecological communities (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) Soil resources; and 6) Historic conditions on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions. | <p>C</p> | <p>Items 1-6 are addressed in each group member’s FMP and the Cutting Notice & Report. DNR reviews and approve Cutting Notices when legislatively mandated and when requested by landowners. In the past, the post-harvest land exam served as the main information collecting step on stands and plant communities however this is changing as new Act requirements become codified. Implementation and full articulation are still being developed. This merits further review in 2020. Some landowner files contain NRCS soil information and maps as well. Maps prepared often include water features.</p> |
| <p>6.1.b. Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.</p> <p>The assessment must incorporate the best available information, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.</p> | <p>C</p> | <p>The short and long-term impacts of planned management activities on the listed elements are reviewed during preparation of the FMP and, when a planned management activity is scheduled, documented on the Cutting Notice & Report.</p> |
| <p>6.1.c. Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.</p> | <p>C</p> | <p>For each stand identified in each group member’s FMP, there are mandatory practices that take into account environmental constraints and potential negative impacts while accomplishing objectives related to timber production, wildlife, and water resources. When a harvest is scheduled, modifications to planned practices may occur in the Cutting Notice prior to harvesting that are consistent with this indicator.</p> |
| <p>6.1.d. On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator</p> | <p>NA</p> | <p>MFL Program does not contain any public lands. This indicator is not applicable.</p> |

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| <p>6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.</p> | | |
| <p>C 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.</p> | <p>C</p> | |
| <p>6.2.a. If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p> | <p>NA</p> | <p>See FF Indicator 6.2.a.</p> |
| <p>FF Indicator 6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present. Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. A secondary review of the survey does not need to be included in the process. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p> | <p>C</p> | <p>Natural Heritage Inventory (NHI) surveys of each MFL property are completed prior to preparing a forest management plan and before a harvest (as documented on Cutting Notices). If the NHI query indicates possible presence of forest-dwelling RTE species, management occurs with the assumption that the species are present. Auditors observed an overall level of conformance with these requirements, including mitigation measures to protect each NHI-identified species on the properties evaluated</p> |
| <p>6.2.b. When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Conservation zones and/or protected areas are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p> | <p>C</p> | <p>See description for FF Indicator 6.2.a. Conservation zones and/or protected areas have been established for sites that contain or may contain RTE species. Examples of these mitigations were observed on the FMUs evaluated.</p> |
| <p>6.2.c. For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.</p> | <p>NA</p> | <p>The MFL Program does not contain any public lands. This indicator is not applicable.</p> |

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| <p>6.2.d. Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).</p> | <p>C</p> | <p>MFL members consist of private lands with two tax rates depending on if an ownership is enrolled as publicly-accessible in the program. Trespass incidents are mostly limited to hunting without permission, particularly on those properties that are not available to public use. Some members gate properties, place signage, and conduct inspections to dissuade trespassers. Violations of wildlife laws is controlled through DNR Law Enforcement.</p> |
| <p>C6.3. Ecological functions and values shall be 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>C</p> | |
| <p>C6.3.a. Landscape-scale indicators</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>C</p> | <p>Maintaining and enhancing under-represented successional stages occurs through use of the WI DNR Silviculture Handbook. Additionally, NHI includes some under-represented communities.</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>C</p> | <p>Rare ecological communities are identified through NHI and by following the Silviculture Handbook. Additionally, the Ecological Landscapes Handbook is used by MFL Certified Plan Writers and Cooperating Foresters to help identify and manage for rare community types. This was noted as an area of strength in the program, see section 5.2 of this report.</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>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>C</p> | <p>If identified, Type 1 and Type 2 old growth is to be managed in accordance with the WI DNR Old Growth and Old Forests Handbook. This handbook is meet 6.3.a.3 requirements for ensuring protection of old growth. Old growth is very rare in Wisconsin, and occurrences on MFL properties have not been identified.</p> <p>No public or tribal lands are within the scope of the certificate, so those portions of this indicator are not applicable.</p> |

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| <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> | NA | <p>Given the relatively small size of the ownerships in the MFL Program, this indicator is not applicable.</p> |
| <p>6.3.c. Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</p> <ol 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. | C | <p>Conformance with WI DNR BMPs for riparian habitat and water quality requirements of this indicator was observed. RMZs were respected, and any harvests within the RMZs were limited to selection cuts. Some group members conducted tree plantings in RMZs that were previously grazed to provide shade and woody debris.</p> |
| <p>Stand-scale Indicators</p> <p>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> | C | <p>Species composition, distribution, and frequency of occurrence are covered by the WI DNR Silviculture Handbook. MFL properties are encouraged to implement the Silviculture Handbook, and conformance with these requirements was observed during the evaluation. The Silvicultural Manual emphasizes that uneven-aged management systems are to be used to continually develop quality growing stock, and this was observed on the ground.</p> |
| <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</p> | C | <p>Nearly all seedlings are obtained from the WI DNR state nurseries. Local sources are used when available, and the local DNR forester must approve tree planting species lists. Observed conformance with planting of red oak, red pine, and other species from the state nursery using local sources of known provenance.</p> |

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| <p>(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> | | |
| <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: 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. Trees selected for retention are generally representative of the dominant species found on the site.</p> | C | <p>Overall conformance with requirements for stand level habitat. For example, large hemlock in northern hardwood stand retained as legacy green tree retention and future snag and den trees, Order #34-002-2008.</p> <p>Requirements of this indicator are covered in the Silviculture Handbook, page 24-13 through 24-18 details legacy and retention</p> |
| <p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific 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> | C | <p>Requirements of this indicator are covered in the Silviculture Handbook. Observed overall conformance with this requirement in even-aged management treatments.</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. | NA | <p>There have not been any deviations from even-aged management restrictions on group member FMUs. This indicator is not applicable.</p> |

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| <p>6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control invasive species, 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. | <p>C</p> | <p>Invasive species are assessed during the writing of forest management plans and prior to each harvest. Interviews with WI DNR foresters and private consulting foresters indicated a high level of awareness about invasive plant problems as noted on sites visited during the 2019 audit (see Site Notes).</p> <p>Cutting Notices and FMPs include an accounting of invasive plants. Herbicide treatment of invasives is conducted on some properties to help to control populations of invasive plants as noted in Site Notes. FMPs were checked during the 2019 audit found to be conformant with this indicator.</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> | <p>C</p> | <p>Fuels management occurs in accordance with the Silviculture Handbook and DNR Forest Management Guidelines. Fire on group member properties is used to control slash or invasive species and as a site preparation tool. Public safety measures and seasonal restrictions are adhered to.</p> |
| <p>C6.4. 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> | <p>C</p> | |
| <p>6.4.a. The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the landscape (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) GAP analyses; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups.</p> <p>For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.</p> | <p>NA</p> | <p>See FF Indicator 6.4.a.</p> |
| <p>FF Indicator 6.4.a For family forests, the forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the landscape (see Criterion 7.1). The consultation and assessment process may be more informal; however, on all FMUs, outstanding examples of common community types (e.g., common types with Natural Heritage viability rankings of A and B) are identified in the assessment to be protected or managed to maintain their conservation value.</p> | <p>C</p> | <p>A GAP analysis was completed and Wisconsin’s State Natural Area (SNA) program has documented locations of native ecosystems. Representative sites are adequately protected across the state through SNAs on public lands, including public lands managed by the DNR and counties, and on lands owned or managed by conservation organizations.</p> <p>If additional outstanding examples arise on MFL, these would be protected through the NHI process, which includes native plant communities. This was confirmed in interviews with local DNR foresters.</p> |
| <p>6.4.b. Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size,</p> | <p>NA</p> | <p>See FF Indicator 6.4.b.</p> |

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| <p>and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes.</p> <p>Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.</p> | | |
| <p>FF Indicator 6.4.b: Low risk of negative social or environmental impact. However, on all FMUs where outstanding examples of common community types exist (see Guidance for 6.4.a.), they should be protected or managed to maintain their conservation value.</p> | C | <p>There is a low risk negative social or environmental impact because Criterion 6.4 is met on lands outside of the MFL program.</p> |
| <p>6.4.c. Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances:</p> <ul style="list-style-type: none"> a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated. | NA | <p>There are no RSAs on properties enrolled in the MFL program. This indicator is not applicable.</p> |
| <p>6.4.d. The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.</p> | C | <p>The need for RSAs on MFP properties would be detected and protected through the NHI process that is updated at least annually.</p> |
| <p>6.4.e. Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.</p> | NA | <p>All lands enrolled in the MFL Program are private. This indicator is not applicable.</p> |
| <p>C6.5. 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> | C | <p>The existence of the Wisconsin BMPs for Water Quality, Wisconsin Forest Management Guidelines, and other manuals produced by DNR, meets this requirement.</p> |
| <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> | NC | <p>See upgrade of Minor CAR 2018.1 to Major CAR 2019.1</p> |
| <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 increase the risk of landslides are excluded in areas where</p> | C | <p>MFL’s implementation of BMPs, Biomass Harvest Guidelines, and Silviculture Handbook result in conformance with the bulleted requirements of 6.5.c.</p> |

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| <p>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 habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated. | <p>NC</p> | <p>See OBS 2018.2 upgraded to Minor CAR 2019.2.</p> |
| <p>6.5.e.1. In consultation with appropriate expertise, the forest owner or manager implements written Streamside Management Zone (SMZ) buffer 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</p> | <p>C</p> | <p>MFL's implementation of BMPs for Water Quality covers this requirement and has a built-in variance mechanism in case minor deviations from minimum BMPs are required to restore riparian tree species composition or conduct other activities intended to restore or protect hydrologic functions in the long-term.</p> <p>RMZs observed in the field demonstrated conformance to this requirement.</p> |

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| <p>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> | | |
| <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 requirements, based on the input of an independent expert in aquatic ecology or closely related field.</p> | NA | <p>No variations from minimum SMZ widths are allowed and none were observed. This indicator is not applicable.</p> |
| <p>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 aquatic habitat. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p> | C | <p>MFL's implementation of BMPs for Water Quality result in conformance to this requirement. Stream crossings reviewed during the evaluation demonstrated conformance. Overall conformance was observed. See 6.5.d.</p> |
| <p>6.5.g. Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.</p> | C | <p>Given their small size and that recreational use is typically limited to family and friends of landowner, MFL properties conform to 6.5.g. On both the publicly-open properties in the program and the ones not open to the public, no instances of damage arising from recreation during the evaluation were observed</p> |
| <p>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.</p> | C | <p>Grazing is prohibited by statute on MFL properties. No such grazing was detected on site visits during the evaluation.</p> |
| <p>C6.6. 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,</p> | C | |

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| <p>proper equipment and training shall be provided to minimize health and environmental risks.</p> | | |
| <p>6.6.a. No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).</p> | C | <p>A review of the chemical list maintained by DNR of all group member applications reported demonstrates that no FSC Highly Hazardous Pesticides are used on areas within the scope of the certificate.</p> |
| <p>6.6.b. All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical. Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.</p> | NA | <p>See FF Indicator 6.6.b.</p> |
| <p>FF Indicator 6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical. Written strategies are developed and implemented that justify the use of chemical pesticides. Family forest owners/managers may use brief and less technical written procedures for applying common over-the-counter products. Any observed misuse of these chemicals may be considered as violation of requirements in this Indicator. Whenever feasible, an eventual phase-out of chemical use is included in the strategy.</p> | C | <p>The MFL program has a demonstrated record of implementing non-chemical options whenever feasible. All chemical applications by landowners requires a Chemical Use Reporting Form to be completed. FSC’s highly hazardous pesticides are prohibited and least toxic chemicals are generally the recommended choice.</p> |
| <p>6.6.c. Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the</p> | C | <p>Application methods are generally done via backpack spraying, and the written prescription typically follows the label rate (unless justified at alternative rate). MSDS recommended safety procedures and equipment are required.</p> |

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| comparative risk of worker exposure, and the overall amount and type of chemicals required. | | |
| 6.6.d. Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites. | C | All chemical applications by landowners requires a Chemical Use Reporting Form to be completed. |
| 6.6.e. If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals. | C | Follow-up monitoring is completed by DNR foresters or Cooperating Foresters and/or MFL Foresters. |
| C6.7. 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. | C | |
| 6.7.a. The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills | C | No evidence of fuel or chemical spills was observed on harvest sites visited. Some harvests had been conducted by FISTA-trained loggers, which includes training on how to handle hazardous spills. |
| 6.7.b. In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations. | C (OB S) | Loggers are required to adhere to FISTA regulations, which require that loggers be able to contain spills in a timely manner. Wisconsin BMPs cover the topic of this indicator. See Observation 2019.3. |
| 6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination. | C | See 6.7.b. |
| C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited. | C | |
| 6.8.a. Use of <i>biological control agents</i> are used only as part of a pest management strategy for the control of invasive plants, <i>pathogens</i> , insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species. | C | WI DNR uses <i>Bacillus thuringiensis kurstaki</i> (Btk) and Nucleopolyhedrosis virus (Gypchek) to control gypsy moth and other forest pests. The safety and effectiveness of these treatments has been substantiated by the scientific literature and are guided by USDA protocols. |
| 6.8.b. If biological control agents are used, they are applied by trained workers using proper equipment. | C | Btk and Gypchek are applied aerially by trained WI DNR contractors. |
| 6.8.c. If biological control agents are used, their use shall be documented, monitored and strictly controlled in | C | Use of Btk and Gypchek follows USDA protocols and plans, which are consistent with the content of this indicator. USDA |

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| accordance with state and national laws and internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored. | | documentation is available from USDA’s website. Wisconsin DNR also has several documents online about the application and monitoring of two biological controls. |
| 6.8.d. Genetically Modified Organisms (GMOs) are not used for any purpose | C | There is no use of GMO trees. |
| C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts. | C | |
| 6.9.a. The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity. | C | Exotic tree species are not used on MFL properties. Although exotic seed mixes are used for erosion control, these are not considered invasive. |
| 6.9.b. If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored. | C | Some exotic seed mixes are used on wildlife food plots. However, food plots fall outside the scope of MFL properties, so this requirement is not applicable in those cases. Exotic seed mixes are used for erosion control, these are not considered invasive. |
| 6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species | C | No impacts from exotic species have been identified. |
| C6.10. 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. | C | |
| 6.10.a Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed). | C | Under the MFL program, group members can have up to 20% of the FMU in non-productive area. If these areas include areas of forest converted to non-forest, such as food plots, these are excised from the scope of FSC as in some cases they would exceed the 2% limit established in this indicator. Food plots are mapped as part of management plans or cutting notices. DNR provided an update to the certificate scope to document these changes. MFL statute allows program participants to remove up to five acres from the MFL program for conversion to a building or other non-forest use. Removed acreage must be in whole (not partial) acreage units from one to five. |
| 6.10.b Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed). | C | There has been no conversion to non-forest land uses other than that acreage that the statute now allows can be removed from the program (and hence from the FSC certified area). See description for Indicator 6.10.a. |
| 6.10.c Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit | C | |

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| (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed). | | |
| 6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations. | C | Conversions from natural forest to plantation do not occur on the MFL properties, as confirmed via field observation. Most pine plantations were started well prior to the 1950s and are being managed for natural tree species that sites can support and be regenerated using seed-tree, shelterwood, and other techniques that rely on natural regeneration. As such, these stands are classified as natural or semi-natural based on management practices and stand trajectories. |
| 6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l) | C | All land-use and stand-type conversions are described in MFL plans and/or Cutting Notices. Converted areas that meet 6.10.a-c may remain within the scope and consist mostly of areas designated for wildlife habitat or food plots. Natural heritage data is reviewed for these areas, thus biodiversity requirements are met. Stand-type conversions are justified based on forest and soil health and other site conditions, landowner objectives and typically do not qualify as conversion to non-forest use. These areas are evaluated for natural heritage data regardless of stand trajectory. |
| 6.10.f Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d. | C | Such conversions are not permitted within the MFL program. MFL rules prohibits any activity that would preclude the practice of forestry, with one exemption made for climate or weather towers used for research purposes. In this case, the group member would have to ask for permission prior to construction. |
| P7 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. | | |
| NE | | |
| 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. | | |
| C8.1 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. | C | |
| 8.1.a Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol. | NA | |

| | | |
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| <p>FF Indicator 8.1.a For Family Forests, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol. Monitoring may be scaled to the size and intensity of the management operations that affect the resources identified in C8.2.</p> | <p>C</p> | <p>Monitoring is generally addressed in the Forest Tax Law Handbook, 2450.5,</p> |
| <p>C8.2. 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>a) Yield – Cutting production reports</p> <ul style="list-style-type: none"> • All certified MFL lands when harvest are required to submit Cutting Reports which include volumes harvested. <p>b) growth rates, regeneration, and condition of the forest are generally monitored through the WI DNR and use of federal FIA data. However, the WI DNR has several initiatives to supplement these including:</p> <ul style="list-style-type: none"> • Summer 2018 - 8 LTE foresters (limited term employment), doing regeneration survey across entire state, including MFL private lands. The plan is to match these up to recent harvests of MFL lands. DNR is specifically planning to examine effects of deer browse and other influencing factors. • Productivity requirement: <ul style="list-style-type: none"> ○ To maintain MFL eligibility landowners will have to maintain productivity which is 20 cords/acre/year to remain in the program which is currently being done by DNR forest specialists. DNR is also exploring potential sampling approaches to make this process more efficient. ○ Potential regeneration impacts may also be assessed relative to productivity requirements. <p>c) composition and observed changes in flora and fauna</p> <ul style="list-style-type: none"> • DMAP program managed by wildlife staff and landowners can requests forester/wildlife biologist to develop specific forest management planning to manage deer habitat. <p>d) environmental and social impacts of harvesting and other operations.</p> <ul style="list-style-type: none"> • Economic fact sheet (2016 data) with direct and indirect economic benefits. <p>e) cost, productivity, and efficiency of forest management</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"> • Operations specialist produces a Stumpage Report which summarizes cutting volumes on an annual basis by species and product class. • MFL Land Exams which occur prior to sending out Mandatory cutting notices to landowners. • Forest Tax Handbook, 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</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) |

| | | |
|---|----|---|
| <p>and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p> | | <ul style="list-style-type: none"> Landowner identification resulting in visit from MFL Forester and/or WI DNR 6 forest health specialist positions are maintained covering the state. They serve as resources and are available to the public, industry, and cooperating foresters. Unanticipated removal (i.e., timber theft) is uncommon and thus only monitored passively unless a landowner requests action in some manner. |
| <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> | C | <p>Records are so maintained via Cutting Reports, WISFRS, and group management records.</p> |
| <p>8.2.c. The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <ul style="list-style-type: none"> Rare, threatened and endangered species and/or their <i>habitats</i>; Common and rare plant communities and/or habitat; Location, presence and abundance of invasive species; Condition of protected areas, set-asides and buffer zones; High Conservation Value Forests (see Criterion 9.4). | C | <p>Items 1-5 are monitored through the NHI data system, periodic timber cruises at time of writing management plan or pre/post-harvest inspection, and various 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> | C | <p>Such monitoring occurs and is described in Forest Tax Handbook, Chapter 21-11.</p> <p>DNR piloted a monitoring protocol in 2017 for random selection of upcoming mandatory practices to ground-truth forest conditions but results were not presented during the 2018 or 2019 audit.</p> <p>See related Minor 2019.7 under FSC-STD-30-005, 5vi.</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> | C | <p>Such monitoring occurs and is described in Forest Tax Handbook, 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> | NA | <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> | NA | <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> | C | <p>See Principle 3 as reported in 2018 audit report.</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> | C | <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</p> |

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| | | management choices (i.e., enroll in MFL and manage for timber products). Such calculations include revenue from timber sales plus the tax savings compared with any costs of management and TSI work. |
| C8.3 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." | NE | |
| C8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan. | NE | |
| C8.5 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. | NE | |
| 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. | | |
| NE | | |
| Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests. | | |
| SCS audit team determined that WI MFL properties are not plantations per se because they are using: 1) native species being naturally regenerated through coppice or sprouting, or planting native stock, 2) FME matches tree species to habitat through use of habitat typing, and 3) FME does not use plantation practices (short-rotations, extreme soil disturbance and other intensive practices). | | |
| APPENDICES | | |
| APPENDIX C: REGIONAL LIMITS AND OTHER GUIDELINES ON OPENING SIZES This Appendix contains regional Indicators and guidance pertinent to maximum opening sizes and other guidelines for determining size openings and retention. These Indicators are requirements based on FSC-US regional delineations Indicator 6.3.g.1 | NA | Not applicable in Lakes States. |
| APPENDIX E: STREAMSIDE MANAGEMENT ZONE (SMZ) REGIONAL REQUIREMENTS Indicator 6.5.e | NA | Not applicable in Lakes States. |

Appendix 6 – Chain of Custody Indicators for FMEs Conformance Table

Chain of Custody indicators were not evaluated during this evaluation.

Appendix 7 – Trademark Standard Conformance Table

SCS Trademark Annex for FMEs: FSC Trademarks, FSC-STD-50-001 V2-0

N/A, does not use/intend to use FSC trademarks for any purposes (finished with this section); or

N/A, is fully integrated and all trademark uses are treated under the COC Annex to this report that includes a full review of FSC-STD-40-004 and FSC-STD-50-001.

Applicable, see below.

PART I: General Requirements for Use of the FSC Trademarks

(FSC “checkmark-and-tree” logo, initials “FSC,” and/or name “Forest Stewardship Council”)

| | |
|--|---|
| <p>Description of how the FME currently uses, or intends to use, FSC trademarks and/or labels, including but not limited to printed materials, Internet applications, on-product labeling, and other public-facing media:</p> | <p>Use is for only for: 1) promotional purposes, 2) sales documentation, and 3) internal communications/documentations.</p> |
| <p>1.2 Trademark License Agreement and valid certificate In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate. <i>Note: Consultations for certification Organizations applying for forest management certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.</i></p> | <p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs</p> |
| <p>1.6 Product Group List The products intended to be labeled or promoted as FSC certified have been included in the FME’s certified product group list.</p> | <p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs</p> |
| <p>Section 1.2 and 1.6 Evidence: See product listing in FSC Product Classification in Section 1.1 of this report.</p> | |
| <p>1.3 Trademark License Code The FSC trademark license code assigned by FSC to the FME accompanies any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material.</p> | <p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs</p> |
| <p>1.4 Trademark Symbol The FSC logo and the ‘Forests For All Forever’ marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered. For use in a country where the trademark is not yet registered, use of the symbol ™ is recommended. The Trademark Registration List document is available in the FSC trade-mark portal and marketing toolkit. The symbol ® shall also be added to ‘FSC’ and ‘Forest Steward-ship Council’ at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure). <i>NOTE: The use of the trademark symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer statement specified in requirement 6.2.</i></p> | <p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, one or more noted exceptions apply</p> |
| <p>2.1 Restrictions on using FSC trademarks</p> | <p><input checked="" type="checkbox"/> C</p> |

| | |
|---|--|
| <p>The FME has not used the FSC trademarks in the following ways:</p> <ul style="list-style-type: none"> a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme; b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the FME, outside the scope of certification; c) to promote product quality aspects not covered by FSC certification; d) in product brand or company names, such as ‘FSC Golden Timber’ or website domain names; e) in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements. | <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs |
| <p>2.2 Translations The name ‘Forest Stewardship Council’ has not been replaced with a translation. A translation may be included in brackets after the name, for example: Forest Stewardship Council® (translation)</p> | <input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, no translations |
| <p>Sections 1.3, 1.4, 2.1, and 2.2 Evidence: Reviews of websites, sales documents (Timber Sale contracts) and other documents encountered during the audit.</p> | |
| <p>Sections 8 and 9 Graphic Rules The FME has only used FSC logos that conform to the standard requirements governing:</p> <ul style="list-style-type: none"> • color and font (8.1-8.3); • format and size (8.4-8.9); • label placement (8.10); and • ‘Forests For All Forever’ marks (9.1-9.7). | <input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not using FSC logo |
| <p>1.5 Trademark Use Approval The FME has submitted all intended uses of the FSC trademarks to SCS for approval. OR The FME has an approved trademark use management system in place. (If the FME has a trademark use management system, complete Annex A.)</p> <p><i>4.6 FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed before the products go to the final point of sale or are delivered to uncertified organizations.</i></p> | <input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs |
| <p>Sections 1.5 Evidence: Online use and sales documents reviewed, FME provided list of approvals that cross-referenced with those listed by SCS.</p> | |

PART II: On-Product Use of FSC Trademarks

N/A, not using on-product trademarks (skip Part II)

PART III: Promotional Use of FSC Trademarks

N/A, not using promotional trademarks (skip Part III)

| | | | | | | | | | |
|---|---|-------------------------------------|---|--------------------------|----|--------------------------|---------|-------------------------------------|---|
| <p>6.1 Catalogues, Brochures, and Websites When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply:</p> <ul style="list-style-type: none"> • It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc. • If both FSC-certified and uncertified products are listed, then a text such as “Look for our FSC®-certified products” shall be used next to the promotional elements and the FSC-certified products shall be clearly identified. • If some or all the products are available as FSC certified on request only, this is clearly stated. | <table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> <tr><td><input type="checkbox"/></td><td>N/A, not using trademarks in catalogues/ brochures/websites</td></tr> </table> | <input checked="" type="checkbox"/> | C | <input type="checkbox"/> | NC | <input type="checkbox"/> | C w/Obs | <input type="checkbox"/> | N/A, not using trademarks in catalogues/ brochures/websites |
| <input checked="" type="checkbox"/> | C | | | | | | | | |
| <input type="checkbox"/> | NC | | | | | | | | |
| <input type="checkbox"/> | C w/Obs | | | | | | | | |
| <input type="checkbox"/> | N/A, not using trademarks in catalogues/ brochures/websites | | | | | | | | |
| <p>6.2 Sales and Delivery Documents When the FSC trademarks are included on sales or delivery document templates that may be used for both FSC and non-FSC products, the following or a similar statement is included: “Only the products that are identified as such on this document are FSC certified”.</p> <p><i>NOTE: Use of the FSC claim and certificate code on invoices does not qualify as FSC trademark use.</i></p> | <table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> <tr><td><input type="checkbox"/></td><td>N/A, not using trademarks on templates for FSC & non-FSC products</td></tr> </table> | <input checked="" type="checkbox"/> | C | <input type="checkbox"/> | NC | <input type="checkbox"/> | C w/Obs | <input type="checkbox"/> | N/A, not using trademarks on templates for FSC & non-FSC products |
| <input checked="" type="checkbox"/> | C | | | | | | | | |
| <input type="checkbox"/> | NC | | | | | | | | |
| <input type="checkbox"/> | C w/Obs | | | | | | | | |
| <input type="checkbox"/> | N/A, not using trademarks on templates for FSC & non-FSC products | | | | | | | | |
| <p>6.3 Promotional Items All promotional items (e.g., mugs, pens, T-shirts, caps, banners, vehicles, etc.) have displayed, at minimum, the FSC logo and FSC trademark license code.</p> | <table border="1"> <tr><td><input type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> <tr><td><input checked="" type="checkbox"/></td><td>N/A, not labeling promotional items</td></tr> </table> | <input type="checkbox"/> | C | <input type="checkbox"/> | NC | <input type="checkbox"/> | C w/Obs | <input checked="" type="checkbox"/> | N/A, not labeling promotional items |
| <input type="checkbox"/> | C | | | | | | | | |
| <input type="checkbox"/> | NC | | | | | | | | |
| <input type="checkbox"/> | C w/Obs | | | | | | | | |
| <input checked="" type="checkbox"/> | N/A, not labeling promotional items | | | | | | | | |
| <p>6.5 Trade Fairs When the FSC trademarks are used for promotion at trade fairs, the FME has:</p> <ol style="list-style-type: none"> clearly marked which products are FSC certified, or add an add a visible disclaimer stating “Ask for our FSC®-certified products” or similar if no FSC-certified products are displayed. <p><i>NOTE: Use of text to describe the FSC certification of the FME does not require a disclaimer.</i></p> | <table border="1"> <tr><td><input type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> <tr><td><input checked="" type="checkbox"/></td><td>N/A, not using trademarks at trade fairs</td></tr> </table> | <input type="checkbox"/> | C | <input type="checkbox"/> | NC | <input type="checkbox"/> | C w/Obs | <input checked="" type="checkbox"/> | N/A, not using trademarks at trade fairs |
| <input type="checkbox"/> | C | | | | | | | | |
| <input type="checkbox"/> | NC | | | | | | | | |
| <input type="checkbox"/> | C w/Obs | | | | | | | | |
| <input checked="" type="checkbox"/> | N/A, not using trademarks at trade fairs | | | | | | | | |
| <p>Section 6.6 and 6.7 Investment/Financial Claims When investment companies or others are making financial claims based on the FME’s FSC certified operations, the FME has taken full responsibility for the use of the FSC trademarks.</p> | <table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table> | <input checked="" type="checkbox"/> | C | <input type="checkbox"/> | NC | <input type="checkbox"/> | C w/Obs | | |
| <input checked="" type="checkbox"/> | C | | | | | | | | |
| <input type="checkbox"/> | NC | | | | | | | | |
| <input type="checkbox"/> | C w/Obs | | | | | | | | |

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| <p>Any such claims have been accompanied by the disclaimer, “FSC is not responsible for and does not endorse any financial claims on returns on investments.”</p> | <input type="checkbox"/> N/A, not making financial claims about FSC status |
| <p>7.1 and 7.2 Other Forestry Certification Scheme Logos The FSC trademarks have not been used together with the marks of other forest certification schemes in a way which implies equivalence, or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.</p> | <input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not using other scheme logos |
| <p>7.3 Business Cards The FSC trademarks have not used on business cards to promote the FME’s certification. The FSC logo or ‘Forests For All Forever’ marks are not used on business cards for promotion. A text reference to the FME’s FSC certification, with license code, is allowed, for example “We are FSC® certified (FSC® C#####)” or “We sell FSC®-certified products (FSC® C#####)”.</p> | <input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, approval granted prior to July 1, 2011 |
| <p>7.4 Promotion with CB Logo FSC certified products have not been promoted using only the SCS Kingfisher and/or SCS Global Services logo.</p> | <input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs |
| <p>Sections 6.1 - 6.3, 6.5-6.7, 7.1-7. 4 Evidence: Review of websites, promotional materials and other documents.</p> | |
| <p>Number of trademark uses reviewed and rationale that sample choice is sufficient to confirm requirements are met: All TM uses and approval from prior year were reviewed. All current uses on contracts and other standard documents were reviewed.</p> | |

Annex A: Trademark use management system

N/A, not using a trademark management system

Annex B. Additional trademark rules for group FM certificate holders

N/A, not a group FM certificate holder or group does not use any FSC trademarks

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|---|--|
| <p>Annex B, 1.1 The group entity (or manager, or central office) shall ensure that all uses of the FSC trademarks by the group entity or its individual members are approved by the certification body prior to use, or that the group and its members have an approved trademark use management system in place. When seeking approval by the certification body, group members shall submit all approvals via the group entity or central office, and keep records of approvals. Alternative submission methods may be approved by the certification body.</p> | <input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs |
| <p>Section 1.1 Evidence: Same as those listed in Parts I-III, above.</p> | |

| | | | | | | | | | |
|--|--|-------------------------------------|---|--------------------------|----|--------------------------|---------|--------------------------|--|
| <p>Annex B, 1.2 The group entity shall not produce any document similar to an FSC certificate for its participants. If individual membership documents are issued, these statements shall be included:</p> <ul style="list-style-type: none"> a) “Managing the FSC® certification program of SCS Global Services” b) “Group certification by SCS Global Services” | <table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> <tr><td><input type="checkbox"/></td><td>N/A, not issuing individual membership documents</td></tr> </table> | <input checked="" type="checkbox"/> | C | <input type="checkbox"/> | NC | <input type="checkbox"/> | C w/Obs | <input type="checkbox"/> | N/A, not issuing individual membership documents |
| <input checked="" type="checkbox"/> | C | | | | | | | | |
| <input type="checkbox"/> | NC | | | | | | | | |
| <input type="checkbox"/> | C w/Obs | | | | | | | | |
| <input type="checkbox"/> | N/A, not issuing individual membership documents | | | | | | | | |
| <p>Annex B, 1.3 No other forest certification schemes’ marks or names shall appear on any membership documents (as per clause 1.2) issued by the group in connection with FSC certification. <i>Note: This only applies to documents issued per Annex B, 1.2 and NOT other documents such as group procedures.</i></p> | <table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table> | <input checked="" type="checkbox"/> | C | <input type="checkbox"/> | NC | <input type="checkbox"/> | C w/Obs | | |
| <input checked="" type="checkbox"/> | C | | | | | | | | |
| <input type="checkbox"/> | NC | | | | | | | | |
| <input type="checkbox"/> | C w/Obs | | | | | | | | |
| <p>Annex B, 1.4 Subcodes of members shall not be added to the license code.</p> | <table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table> | <input checked="" type="checkbox"/> | C | <input type="checkbox"/> | NC | <input type="checkbox"/> | C w/Obs | | |
| <input checked="" type="checkbox"/> | C | | | | | | | | |
| <input type="checkbox"/> | NC | | | | | | | | |
| <input type="checkbox"/> | C w/Obs | | | | | | | | |
| <p>Sections 1.2, 1.3, and 1.4 Evidence: Same as those listed in Parts I-III, above.</p> | | | | | | | | | |

Appendix 8 – Group Management Program

SCS audits Group entities and group members to the FSC Group Management Standard at least once over the course of the certificate. 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. SCS will also audit those portions of the group standard against which non-conformities or other findings were issued in prior years. Finally, SCS may address any aspect of the FSC Group Management Standard encountered during the normal course of an audit as an aspect of the Management System evaluation.

Detailed Observations for FSC-STD-30-005 FSC Standard for Group Entities in Forest Management Groups

| Requirement | C/NC | Comment/CAR |
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| 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. | NE | |

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| <p>1.2 The Group entity shall comply with relevant legal obligations, as registration and payment of applicable fees and taxes.</p> | <p>NE</p> | |
| <p>1.3 The Group entity shall have a written public policy of commitment to the FSC Principles and Criteria.</p> | <p>NE</p> | |
| <p>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.</p> | <p>C</p> | <p>Private Forestry Handbook Chapter 10 (starts 10-10) - 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>However, in 2018 multiple Tax Specialist foresters were unable to demonstrate knowledge of Wisconsin State BMPs when interviewed by auditors specifically related to practices and requirements for water bars installation. Furthermore, foresters interviewed did not have access to, or a copy of, Wisconsin BMPs for Water Quality in the field (none had copies in trucks or on phones except the Group Manager). When requested, foresters were not able to provide copies of BMP manuals to auditors in the field such that it was unclear how foresters would check timber sales set up for inspecting Cutting Notices or for inspecting Cutting Reports in the field. In 2019 this was corrected, see closure of Minor CAR 2018.4.</p> |
| <p>C2 Responsibilities</p> | | |
| <p>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).</p> <p><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></p> <p><i>SCS Guidance: It should be clear in documents what the responsibilities are of the Group entity, Group members (both SLIMF and Non-SLIMF members, as applicable), and other involved parties (e.g., contractors involved in group management).</i></p> | <p>C</p> | <p>Group Entity responsibilities: Forest Tax Handbook- Group Manager 21-4 DNR Service Foresters 21-4 Cooperating Foresters 21-5</p> <p>SLIMF Group member responsibilities: Forest Tax Handbook- Group Members 21-6</p> |

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| 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 | Katharine Haan has been appointed as the MFL certification Group Manager. See Observation 2018.5. |
| 2.3 Group entity staff and Group members shall demonstrate knowledge of the Group’s procedures and the applicable Forest Stewardship Standard. | C | Demonstrated knowledge was adequate except for 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 as provided below. |
| I. Organizational structure; | C | Forest Tax Handbook Chapter 21, page 21-4, The Group Organization – Roles and Responsibilities |
| 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, page 21-4, The Group Organization – Roles and Responsibilities |
| III. Rules regarding eligibility for membership to the Group; | C | Forest Tax Handbook Chapter 21-5 and Chapter 22-2. |
| IV. Rules regarding withdrawal/ suspension of members from the Group; | C | Forest Tax Handbook Chapter 21-9 and 21-14. |
| 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 21-9, 21-10 and 21-14. |
| 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. | NC | 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 |

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| | | <p>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 initiated July 1, 2017 resulted in fewer DNR Forester positions (34 vs. 140+) being directly involved in cutting notice review and processing, with 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, and other professionals. With fewer DNR Foresters charged with tax law work, staff plans to develop and cultivate strong working relationships with private sector foresters, other professionals, landowners, and logging contractors to tailor guidance and education on the CN process to specific cases and individuals.</p> <p>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 was released and includes 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 (reference), the Wisconsin Forest Management Guidelines, and the DNR Timber Sale Handbook, all available on-line at http://dnr.wi.gov/topic/ForestManagement/ <p>See 3.3 for additional detail. See Major CAR 2019.5 for additional detail from the 2019 audit.</p> |
| <p>3.3 The Group entity shall define the personnel responsible for each procedure together with the qualifications or training measures required for its implementation.</p> | <p>C</p> | <p>DNR maintains a Cutting Notice (CN) Registration List of private sector individuals that are either Cooperating Foresters (through DNR’s Cooperating Forester Program), Accredited Foresters</p> |

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| | <p>(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.</p> <p>Changes to the Forest Tax Section initiated July 1, 2017 resulted in fewer DNR Forester positions (34 vs. 120+, with some vacancies) 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.</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 was released in 2017 and included 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 (reference), the Wisconsin Forest Management Guidelines, and the DNR Timber Sale Handbook, all available on-line at http://dnr.wi.gov/topic/ForestManagement/ <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 Registration List (reviewed in office portion of the</p> |
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| | | audit). Field inspections, document review and interviews in the field demonstrated effective implementation and effective internal control systems. |
| <p>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 nonconformities 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.</p> <p><i>NOTE: for applicants complying with SLIMF eligibility criteria for size, the initial evaluation may be done through a desk audit.</i></p> | C | Forest Tax Handbook Chapter 21 and see Section 20-11. |
| C4 Informed consent of Group members | NE | |
| <p>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:</p> | 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 |
| <p>v. Explanation of any obligations with respect to Group membership, such as:</p> <p><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></p> | 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 |

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| c. requirement to conform with conditions or corrective action requests issued by the certification body and the group entity | C | Forest Tax Handbook Chapter 21 |
| 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 | NE | |
| 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 centrally wherever possible.</i> | C (Obs) | Records maintained in forestry offices in each County. Verified in Counties selected for this audit. See also Obs 2019.6. |
| 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 2018 audit. |
| ii. Any records of training provided to staff or Group members, relevant to the implementation of this | C (OBS) | Training records were verified for MFL foresters at DNR offices that were subject of this audit. Training |

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| standard or the applicable Forest Stewardship Standard; | | <p>Agendas were provided from 2018-2019 held prior to the audit. However, detailed information about training content and lists of attendees were not maintained. Interviews with group manager confirmed that all forestry staff attended and interviews with staff confirmed the training content and attendance. Training records would be greatly strengthened by including curriculum or other details of training content and by verifiable lists of attendees.</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. See Observation 2019.6.</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 2019 audit. |
| iv. Evidence of consent of all Group members; | C | |
| v. Documentation and records regarding recommended practices for forest management (i.e. silvicultural systems); | C | Verified for all MFL properties visited in 2019 audit. |
| 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 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. | C | No sub-certificates are issued. |
| PART 2 GROUP FEATURES | | |
| C6 Group Size | NE | |
| 6.1 There is no restriction on the maximum size that a group certificate can cover in terms of | C | Forest Tax Handbook Chapter 21 |

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| <p>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.</p> <p><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></p> | | |
| <p>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.</p> | C | Forest Tax Handbook Chapter 21 |
| <p>C7 Multinational groups</p> | NE | |
| <p>7.1 Group schemes shall only be applied to national groups which are covered by the same Forest Stewardship Standard.</p> | NA | Group members and group entity are all located within the boundaries of the State of Wisconsin, USA. |
| <p>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.</p> | NA | Group members and group entity are all located within the boundaries of the State of Wisconsin, USA. |
| <p>PART 3 INTERNAL MONITORING</p> | | |
| <p>C8 Monitoring requirements</p> | | |
| <p>8.1 The Group entity shall implement a documented monitoring and control system that includes at least the following:</p> | C | Forest Tax Handbook Chapter 21 |
| <p>i. Written description of the monitoring and control system;</p> | C | Forest Tax Handbook Chapter 21 |
| <p>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 any additional requirements for membership of the Group.</p> | C | Forest Tax Handbook Chapter 21 2016 MFL Internal Audit Report |
| <p>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.</p> <p><i>NOTE: The Group entity may focus its monitoring during a particular annual surveillance evaluation on specific elements of the applicable Forest</i></p> | C | Forest Tax Handbook Chapter 21 2018 MFL Internal Audit Report |

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| <p><i>Stewardship Standard, with the provision that all aspects of the Forest Stewardship Standard are audited during the period of validity of the certificate.</i></p> | | |
| <p>8.3. The minimum sample to be visited annually for internal monitoring shall be determined as follows:</p> <p><i>NOTE: for the purpose of sampling, FMUs qualifying as SLIMF according to FSC-STD-01-003 V1-0 in connection with FSC-STD-01-003a, 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></p> <p><i>SCS Guidance: This means that, for the purposes of internal monitoring, the group entity may base its sample on RMUs whether these are 'low intensity' or 'small' SLIMF. The CB applies different sampling rules to 'low intensity' SLIMF, though.</i></p> | C | <p>Forest Tax Handbook Chapter 21 2018 MFL Internal Audit Report</p> |
| <p>a) Type I Groups with mixed responsibilities (see section D Terms and definitions)</p> <p>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.</p> | C | <p>Forest Tax Handbook Chapter 21 2018 MFL Internal Audit Report</p> |
| <p>b) Type II Resource Manager Groups (see section D Terms and definitions)</p> <p>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).</p> | NA | |
| <p>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. National SLIMF eligibility criteria should be considered.</p> | C | <p>This was not done for the 2018 internal audit which was used as a training exercise for the new Group Manager.</p> |
| <p>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.</p> | C | <p>2018 Internal Audit covered.</p> |

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| 8.6 In the selection process of members to be visited, the Group entity should include random selection techniques. | C | 2018 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 | 2018 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 | NE | |
| 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. | | |
| 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. | | |
| 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. | | |
| 9.4 The Group entity shall ensure that all uses of the FSC Trademark are approved by the responsible certification body in advance. | | |

Group Management Program Members

The following list is also available online,



Group Member
Annual Report - 2019.