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Forest Management **2018 Annual audit** Report for:

Ecotrust Canada In Vancouver, British Columbia, Canada

Report Finalized:

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Standard Conversions

1 mbf = 5.1 m³
 1 cord = 2.55 m³
 1 gallon (US) = 3.78541 liters

 1 inch = 2.54 cm
 1 foot = 0.3048 m
 1 yard = 0.9144 m
 1 mile = 1.60934 km
 1 acre = 0.404687 hectares

 1 pound = 0.4536 kg
 1 US ton = 907.185 kg
 1 UK ton = 1016.047 kg

1. INTRODUCTION

The purpose of this report is to document annual audit conformance of Ecotrust Canada, hereafter referred to as Forest Management Enterprise (FME). The report presents the findings of Rainforest Alliance auditors who have evaluated company systems and performance against the Forest Stewardship Council™ (FSC®) forest management standards and policies. Section 2 of this report provides the audit conclusions and any necessary follow-up actions by the company through nonconformity reports.

The Rainforest Alliance founded its previous SmartWood program in 1989 to certify responsible forestry practices and has grown to provide a variety of auditing services. Rainforest Alliance certification and auditing services are managed and implemented within its RA-Cert Division. All related personnel responsible for audit design, evaluation, and certification/verification/validation decisions are under the purview of the RA-Cert Division, hereafter referred to as Rainforest Alliance or RA.

This report includes information which will become public information. Sections 1-3 and Appendix I will be posted on the FSC website according to FSC requirements. All other appendices will remain confidential. A copy of the public summary of this report can be obtained on the FSC website at <http://info.fsc.org/>.

Dispute resolution: If Rainforest Alliance clients encounter organizations or individuals having concerns or comments about Rainforest Alliance and our services, these parties are strongly encouraged to contact Rainforest Alliance regional or Headquarters offices directly (see contact information on report cover). Formal complaints or concerns should be sent in writing.

2. AUDIT FINDINGS AND RESULTS

2.1. Audit conclusion

Based on Company's conformance with FSC and Rainforest Alliance requirements, the audit team makes the following recommendation:	
<input checked="" type="checkbox"/>	Certification requirements <u>met</u>, certificate maintenance recommended Upon acceptance of NCR(s) issued below
<input type="checkbox"/>	Certification requirements <u>not met</u>:
Additional comments:	
Issues identified as controversial or hard to evaluate.	

2.2. Changes in FMEs' forest management and associated effects on conformance to standard requirements:

Group entity 'Elkington Forest' has changed ownership and as a result the name is now 'Malahat Forest Estates (Trust for Sustainable Forestry)'. The property is managed under a covenant which in turn is owned by the 'Trust for Sustainable Forestry'. This ownership change does not result in a material change to forest management for the group member.

2.3 Excision of areas from the scope of certificate

Not applicable. Check this box if the FME has not excised areas from the FMU(s) included in the certificate scope as defined by FSC-POL-20-003. *(delete the rows below if not applicable)*

2.4. Stakeholder issues *(complaints/disputes raised by stakeholders to FME or Rainforest Alliance since previous evaluation):*

FSC Principle	Stakeholder comment	Rainforest Alliance response
P1: FSC Commitment and Legal Compliance	No comments received	No response needed
P2: Tenure & Use Rights & Responsibilities	No comments received	No response needed
P3: Indigenous Peoples' Rights	A local Indigenous organization noted that communications are clear and there have been no concerns with operations over the last audit period.	No response needed
P4: Community Relations & Workers' Rights	The provincial government indicated that the Burns Lake certificate holder has acted in a respectful and professional manner in regards to recreation sites and trails programs.	No response needed
	One community association with resource rights indicated that the Burns Lake certificate holder was very communicative, responsive and supportive (financially and otherwise) towards maintaining and improving access to their resource rights.	No response needed
	An adjacent tenure holder to Marshall Forestry indicated that the certificate holder is an active and engaged member of the community.	No response needed

	A tenure and rights holder within the Burns Lake certificate area raised concerns around the impact of public access upon hunting and trapping resources, specifically the re-activation of roads and the time required to develop and access management plan.	The certificate holder is developing an access management plan to address road density. A Moose Mitigation Project is underway to map moose habitat and develop a road de-commissioning plan consistent with an access management plan that is underway. See NCR 6.3.12/18.
P5: Benefits from the Forest	No comments received	No response needed
P6: Environmental Impact	The Federal government identified siltation issues along roads near Taltapin Lake.	The area of concern is outside of the Burns Lake certificate holders tenure area and therefore out of scope for this audit.
	A forest tenure and rights holder identified concerns with ungulate range being affected by logging along the north shores of Babine lake and impacts to wildlife from logging or developments near the Mt. McCrea area. A local non-profit commends Burns Lake certificate holder for continued financial support	The area of concern is outside of the Burns Lake certificate holders tenure area and therefore out of scope for this audit. No response needed
P7: Management Plan	No comments received	No response needed
P8: Monitoring & Assessment	No comments received	No response needed
P9: Maintenance of High Conservation Value Forest	No comments received	No response needed
P10: Plantations	No comments received	No response needed

2.5. Conformance with applicable nonconformity reports

The section below describes the activities of the certificate holder to address each applicable non-conformity report (NCR) issued during previous evaluations. For each NCR a finding is presented along with a description of its current status using the following categories. Failure to meet NCRs will result in nonconformances being upgraded from minor to major status with conformance required within 3 months with risk of suspension or termination of the Rainforest Alliance certificate if Major NCRs are not met. The following classification is used to indicate the status of the NCR:

Status Categories	Explanation
Closed	Operation has successfully met the NCR.
Open	Operation has either <u>not met</u> or has <u>partially met</u> the NCR.

NCR#:	6.1.3/17	NC Classification:	Major	Minor X
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)			
Report Section:	Appendix II, Indicator 6.1.3			
Description of Nonconformance and Related Evidence:				
Channel assessments are done at the block level, but watershed condition is not considered in the operational management planning process regarding hydrological features and risks.				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.			
Timeline for Conformance:	12 months following the report finalization date			
NCR Evaluation Type	On-site <input type="checkbox"/> Desk Review <input checked="" type="checkbox"/>			
Evidence Provided by Organization:	A hydrologic recovery analysis was conducted on all 10 watersheds within the community forest. The analysis used the Interior Watershed Assessment Procedures Guidebook (BC Ministry of Forests, 1995) assumptions for equivalent clearcut area (ECA).			
Findings for Evaluation of Evidence:	The hydrologic recovery analysis has been used for the Community Forest's 5-year operational planning. All watersheds are above the ECA threshold stipulated in 6.5.8. This indicator has been met.			
NCR Status:	CLOSED			
Comments (optional):				

NCR#:	6.2.4/17	NC Classification:	Major	Minor X
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)			
Report Section:	Appendix II, Indicator 6.2.4			
Description of Nonconformance and Related Evidence:				
Forest workers interviewed had a handbook that listed a summary of species required by indicator 6.2.1, but they had not been trained per the 6.2.4 requirements for dealing with unexpected encounters of these species and what procedure to implement thereafter.				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.			
Timeline for Conformance:	12 months following the report finalization date			
NCR Evaluation Type	On-site <input checked="" type="checkbox"/> Desk Review <input type="checkbox"/>			
Evidence Provided by Organization:	Interviews with staff and forest workers confirmed that pre-work planning meetings cover management or response strategies for the relevant focal species/species at risk within development areas. Forest workers had access to the <i>Safety and Environmental Handbook</i> published by the Community Forest.			
Findings for Evaluation of Evidence:	Interviews with forest workers demonstrated an understanding of the identification of focal species and species at risk and procedures to follow in circumstances of incidental encounters, which includes stopping work and consulting Community Forest representatives.			
NCR Status:	CLOSED			
Comments (optional):				

NCR#:	6.4.4/17	NC Classification:	Major	Minor X
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)			
Report Section:	Appendix II, Indicator 6.4.4			
Description of Nonconformance and Related Evidence:				
The certificate holder has not demonstrated how management treatments in dynamic reserves intend to mimic stand-replacing natural disturbances by (a) employing on a frequency (i.e. rotation age) that is at least 1.2 times the estimated average return interval for those disturbance (b) and include stand level retention significantly above the estimated average natural retention levels for those disturbances.				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.			
Timeline for Conformance:	12 months following the report finalization date			
NCR Evaluation Type	On-site <input checked="" type="checkbox"/> Desk Review <input type="checkbox"/>			
Evidence Provided by Organization:	Government Action Regulation (the Order) for Landscape Connectivity corridors (SRMP); Range of Natural Variability (RONV) Assessment; Harvest planning map for 2019-2025; Timber Supply Analysis (Forsite, 2017)			

Findings for Evaluation of Evidence:	Landscape connectivity corridors are large Provincially designated reserves established throughout the Community Forest amounting to approximately 500 hectares. These are considered the dynamic reserves for the purpose of 6.4.4. The RENV assessment identifies 100 years as the average return interval, meaning the Community Forest planning would have to target a 120 year rotation within these dynamic reserves. This indicator is met as the Community Forest has no management treatments (e.g., harvest operations) within these dynamic reserves.
NCR Status:	CLOSED
Comments (optional):	

NCR#:	6.5.8/17	NC Classification:	Major	Minor X
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)			
Report Section:	Appendix II, Indicator 6.5.8			
Description of Nonconformance and Related Evidence:				
The manager has not calculated and demonstrated that increases in peak flow maintain weighted equivalent clearcut area (ECA) to less than 25% within watersheds.				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.			
Timeline for Conformance:	12 months following the report finalization date			
NCR Evaluation Type	On-site <input type="checkbox"/> Desk Review <input checked="" type="checkbox"/>			
Evidence Provided by Organization:	A hydrologic recovery analysis was conducted on all 10 watersheds within the community forest. The analysis used the Interior Watershed Assessment Procedures Guidebook (BC Ministry of Forests, 1995) assumptions for equivalent clearcut area (ECA).			
Findings for Evaluation of Evidence:	The ECA analysis demonstrates that all watersheds within the Community Forest are below the 25% threshold. The watershed with the lowest hydrologic recovery is Maxan lake watershed at 77.5%. Note that the majority of the Maxan lake watershed unit is outside of the certificate area and limited operations are planned within this watershed in the next 5-year period. The requirements for this indicator have been met.			
NCR Status:	CLOSED			
Comments (optional):				

NCR#:	6.7.1/17	NC Classification:	Major	Minor X
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)			
Report Section:	Appendix II, Indicator 6.7.1			
Description of Nonconformance and Related Evidence:				

During field visits, the audit team interviewed on one site two forest workers and visited two machines. There were no spill kits on site, one of the fire extinguishers had not been inspected since 2012, forest workers lacked Environmental Management System training and the fuel tanks' nozzles in the back of the pickup trucks were not secured or contained in a way to prevent an unexpected failure of the nozzle.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.
Timeline for Conformance:	12 months following the report finalization date
NCR Evaluation Type	On-site <input checked="" type="checkbox"/> Desk Review <input type="checkbox"/>
Evidence Provided by Organization:	Field interviews and inspections of fire extinguishers and spill kits of 2 skidders, 1 grapple/forwarder, 1 pickup truck.
Findings for Evaluation of Evidence:	All vehicles/equipment had full fire extinguishers with current inspections. Four spill kits were inspected for a grapple loader, two skidders and a pickup and all contained spill kit equipment. Contents of spill kits are not specified under the Occupational Health and Safety regulation of the Workers Compensation Act or the Federal Transportation of Dangerous Goods Regulation, however best practices have been published (<i>A Field Guide to Fuel Handling, Transportation & Storage</i> , Ministry of Water, Land and Air Protection, 2002). Spill kits should consider rubber, nitrile or protective gloves, hazmat disposal or liner bags or pails, and bentonite clay (or other emergency tank fillers). One spill kit inspected was missing disposable bags and emergency tank fillers (although other mitigative materials/equipment was on-hand). See Observation 6.7.1/18 regarding a need for a review of standard operating procedures regarding the prevention of contamination from the use and disposal of chemicals. The requirements for this indicator have been met.
NCR Status:	CLOSED
Comments (optional):	

NCR#:	8.5.1/17	NC Classification:	Major	Minor X
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)			
Report Section:	Appendix II, Indicator 8.5.1			
Description of Nonconformance and Related Evidence:				
The summary of the results of monitoring was made available to interested parties. However, it did not include all the information required in 8.2.				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.			
Timeline for Conformance:	12 months following the report finalization date			
NCR Evaluation Type	On-site <input type="checkbox"/> Desk Review <input checked="" type="checkbox"/>			
Evidence Provided by Organization:	The Timber Supply Analysis report (Forsite 2017) Group certificate monitoring report. Forest Management Plan Updated LiDAR derived forest inventory			

	Operational scale Unmanned Aerial Vehicle (UAV) imagery analysis
Findings for Evaluation of Evidence:	Information specific to 8.2 was made available during the audit. The organization maintains an office in downtown Burns Lake and extends an open door policy for the public. An information room is open to the public with an appropriate variety of publicly displayed monitoring information. Interviews with staff confirmed that, beyond online documentation, monitoring information (e.g., Timber Supply Analysis and documentation) can be made available upon request. The requirements for this indicator have been met.
NCR Status:	CLOSED
Comments (optional):	

NCR#:	9.1.2/17	NC Classification:	Major	Minor X
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)			
Report Section:	Appendix II, Indicator 9.1.2			
Description of Nonconformance and Related Evidence:				
The HCVF assessment has not been reviewed by an independent, third-party input from and review by qualified specialists.				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.			
Timeline for Conformance:	12 months following the report finalization date			
NCR Evaluation Type	On-site <input type="checkbox"/> Desk Review <input checked="" type="checkbox"/>			
Evidence Provided by Organization:	- HCVF report review			
Findings for Evaluation of Evidence:	Third-party review report of the HCVF assessment by Dr. Karen Price for the BLCF was completed and made available during the audit therefore meeting the requirement of this indicator. Note the report was completed during the week of the audit, and therefore the results of the report were not able to be reviewed by the BLCF or implemented for this audit period. The HCVF assessment provides significant recommendations to update the HCVF management strategies. See Observation 9.1.2/18 . The independent review meets the requirements of this indicator.			
NCR Status:	CLOSED			
Comments (optional):				

NCR#:	9.1.4/17	NC Classification:	Major	Minor X
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)			
Report Section:	Appendix II, Indicator 9.1.4			
Description of Nonconformance and Related Evidence:				

<p>The HCVF assessment does not include (b) a risk assessment methodology appropriate to the conservation attribute to be maintained or restored, (c) the monitoring program was not completed for the audit and consequently, (d) an adaptive management strategy appropriate to the conservation attribute and its level of sensitivity was not developed in consideration of the monitoring program.</p> <p><u>Note:</u> HCVs identified in the HCVF assessment have a management strategy, which may depend on regulations or guidance by the province or measures defined by the certificate holder itself. But the certificate holder was still working on defining the overall structure (i.e. roles, measures, frequency) of its monitoring program for each HCV.</p>	
Corrective Action Request:	<p>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.</p>
Timeline for Conformance:	12 months following the report finalization date
NCR Evaluation Type	On-site <input type="checkbox"/> Desk Review <input checked="" type="checkbox"/>
Evidence Provided by Organization:	<p>5 year strategic development plan; HCVF assessment; RONV risk assessment; HCVF third-party review report; Environmental values report; Staff interviews (including monitoring procedures for pre and post-harvest evaluations) Stakeholder interviews Forest Stewardship Plan Timber Supply Analysis (Foresite 2017)</p>
Findings for Evaluation of Evidence:	<p>Pre and post-harvest plans are evaluated/monitored to determine plan conformance for the management of HCVFs (e.g., riparian areas) through the use of UAVs and GIS analysis. The certificate holder has management strategies for each HCVF category.</p> <ul style="list-style-type: none"> • For HCVF (1): a 5 year operational planning is evaluated relative to habitat requirements for Grizzly bears and ungulate winter range. • Landscape corridors, OGMAS and Wildlife Tree Retention Area patches meet habitat management objectives for many focal species. <i>Identified Wildlife Management Strategies</i>, incorporated into their HCVF assessments, provide a baseline for habitat management in the context of risk and population viabilities. • Landscape level modelling (using <i>Patchworks</i>) provide forest age class projections that indicate age distributions moving towards a natural range of variability (HCVF 2). • Ecosystem representation has been monitored/evaluated relative to FSC targets at a strategic scale (HCVF 3). (See NCR 6.4.1/18 regarding ecosystem representation in protected areas). • The certificate holder monitors the diversity of conifer species through stocking standards and has researched and implemented assisted migration (e.g., planting of western larch following seed transfer guidelines) to anticipate changing ecological amplitudes due to climate change. • The certificate holder has conducted hydrologic recovery analysis towards watershed protection - See Note 9.1.4/18 regarding the operational evaluation of water licences. Unstable terrain are avoided and excluded from harvest projections (THLB) (HCVF 4).

	<ul style="list-style-type: none"> • Extensive planning and monitoring of operational impacts to recreation values are ongoing. See NCR 9.4.1/18 as it relates to an overall monitoring program. <p>This indicator has been met.</p>
NCR Status:	CLOSED
Comments (optional):	

2.6. New nonconformity reports issued as a result of this audit

NCR#:	6.3.12/18	NC Classification:	Major	Minor X
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)			
Report Section:	Appendix II, Indicator 6.3.12			
Description of Nonconformance and Related Evidence:				
<p>Access management measures are a requirement under indicator 6.3.12. An access management plan is still underway to address non-timber objectives. The recent HCFV Assessment review recommended a need for access management to mitigate impacts to Grizzly habitat. The Moose management strategies includes recommendations from qualified specialists to determine road densities/distance to roads (<i>Environmental Values within the Burns Lake Community Forest, 2017</i>) and based on stakeholder interviews, a lack of an access management plan is perceived to be affecting resource tenure holders and forest users within the certificate area. The plan can be used to implement measures towards managing access-sensitive species (e.g., Grizzly, moose) and maintaining resource rights of First Nations and other forest users.</p>				
Corrective Action Request:	<p>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.</p>			
Timeline for Conformance:	12 months following the report finalization date			
NCR Evaluation Type	On-site <input checked="" type="checkbox"/> Desk Review <input type="checkbox"/>			
Evidence Provided by Organization:	PENDING			
Findings for Evaluation of Evidence:	PENDING			
NCR Status:	OPEN			
Comments (optional):				

NCR#:	6.4.1/18	NC Classification:	Major	Minor X
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)			
Report Section:	Appendix II, Indicator 6.4.1			
Description of Nonconformance and Related Evidence:				
<p>The ESSFmc BEC zone is currently under-protected per the analysis completed in the HCFV report. The manager is currently working with the British Columbia Ministry of Forests, Lands, Natural Resources Operations and Rural Development (MFLNRORD) to have this BEC zone protected to required level under Table P6-1. However a reserve network, which can include dynamic reserves, needs to be designated by the manager and delineated on maps (not including <i>de facto</i> reserved inoperable areas unless they meet specific ecological objectives as per 6.4.1). The HCFV assessment currently lists that 12% of the ESSF mc are protected under the certificate area, with a required target of 24% (Table P6-1). The <i>Burns Lake Community Forest Mountain Pine Beetle salvage Chance Planning- 5 year Harvest Sequence Planning (2018)</i> report indicates proposed harvest plans within the ESSF mc within year 4, which will only focus on dead pine stands over 70%, but still increases the risk of not managing the minimum percentage area for ecosystem representation by BEC variant within the management unit.</p>				

This is considered a minor NCR given the time between the NCR issuance and the length of time ahead of planned development in the ESSF mc.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.
Timeline for Conformance:	12 months following the report finalization date
NCR Evaluation Type	On-site <input checked="" type="checkbox"/> Desk Review <input type="checkbox"/>
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR#:	9.4.1/18	NC Classification:	Major	Minor X
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)			
Report Section:	Appendix II, Indicator 9.4.1			
Description of Nonconformance and Related Evidence:				
<p>The manager has not implemented a specific program to monitor the status of HCVFs and conservation attributes. Clear evidence was provided for the monitoring of the <i>implementation</i> of strategies to protect a number of HCVFs and conservation attributes (see Appendix II, 9.1.4), however no clear program evaluates the effectiveness of the measures employed for their maintenance or restoration of HCVFs.</p> <p>A BLCF Monitoring Plan was provided during the audit which does indicate the delegated responsibilities, frequency and general method, however there were significant gaps (particularly within P6 and P9). A program that provides replicable (systems-based) feedback to the manager to ensure changes to the status of the HCVF are tracked and management adapted as required. Examples include: the absence of measures to assess stand level retention for red or blue listed ecological communities (HCVF 3) listed within the HCVF assessment; qualifying post-harvest indicators for effective stand structure or habitat requirements for HCVF 1 species (where they interface with operations), or; re-evaluating the effectiveness of moose winter range mapping post-MPB. While not all conservation attributes lend themselves to short-term ongoing (annual) monitoring, a program is required to rationalize the selection, frequency and sampling intensity of monitoring indicators consistent with principle 8.</p>				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.			
Timeline for Conformance:	12 months following the report finalization date			
NCR Evaluation Type	On-site <input checked="" type="checkbox"/> Desk Review <input type="checkbox"/>			
Evidence Provided by Organization:	PENDING			
Findings for Evaluation of Evidence:	PENDING			

NCR Status:	OPEN
Comments (optional):	

2.7. Audit observations

Observations can be raised when issues or the early stages of a problem are identified which does not of itself constitute a nonconformance, but which the auditor considers may lead to a future nonconformance if not addressed by the client. An observation may be a warning signal on a particular issue that, if not addressed, could turn into a NCR in the future (or a pre-condition or condition during a 5 year re-assessment).

OBS 4.2.1/18	Reference Standard & Requirement: Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005), Indicator 4.2.1
<p><i>For BLCF</i> Object markers (delineators) are a best practice as per the <i>Engineering Manual</i> (B.C. Ministry of Forests, Lands and Natural Resource Operations and Rural Development, 2018) and considered part of regular surface maintenance for bridges. Delineators are considered advisory policy and not necessarily mandatory (e.g., not legally enforceable) (<i>Manual of Standard Traffic Signs and Pavement markings</i>, B.C. Ministry of Transportation, 2000), however are an important safety measure for identifying hazards. One bridge crossing within the BLCF was missing delineators (note that the road was not planned for heavy machinery or hauling).</p> <p><i>SLIMF group members</i> Not applicable</p>	
<p>Observation: The manager should ensure appropriate safety measures are employed relative to the regular surface maintenance of bridges.</p>	

OBS 5.6.6/18	Reference Standard & Requirement: Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005), Indicator 5.6.6
<p><i>For BLCF</i> Not applicable</p> <p><i>For SLIMF group members</i> An elevated harvest rate has been planned and implemented in order to account for catastrophic windthrow event within WL470 which occurred in June 2018. The apportioned Allowable Annual Cut for the Schedule 'B' (Crown lands) is 904m³ per year, and as a result of salvaging timber from the windthrow event, it is anticipated that up to 200 highway logging truck loads will be logged in 2018/2019 (up to 6,000m³). It is to be noted that a full assessment has not been completed and how much of the 6,000m³ is part of the certified area or not.</p>	
<p>Observation: The manager must ensure that the 5-year average cut does not exceed the long term harvest level.</p>	

OBS 6.7.1/18	Reference Standard & Requirement: Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005), Indicator 6.7.1
<i>For BLCF and SLIMF group members</i>	
Contents of spill kits are not specified under the Occupational Health and Safety regulation of the Workers Compensation Act or the Federal Transportation of Dangerous Goods Regulation, however best practices have been published (<i>A Field Guide to Fuel Handling, Transportation & Storage</i> , Ministry of Water, Land and Air Protection, 2002). Spill kits should consider rubber, nitrile or protective gloves, hazmat disposal or liner bags or pails, and bentonite clay (or other emergency tank fillers), as well as absorbent pads and other materials appropriate to the volume of chemical transport. Four spill kits were inspected during the audit, and one spill kit was missing disposable bags and emergency tank fillers (although other mitigative materials/equipment was on-hand).	
Observation: Managers need to review standard operating procedures for the stocking and replacement of spill kit materials towards the prevention of contamination from the use and disposal of chemicals.	

2.8. Notes

NOTE 03/15	Reference Standard & Requirement: FSC Regional Certification Standard for British Columbia for Small Operators (2005), Indicator 6.2.3.	
In the case of Elkington and Shawnigan Lake School, new federal Recovery Strategies for Red Legged Frogs and Marbled Murrelet have been developed but have not yet been implemented by the government. These Recovery Strategies have not been assessed in relation to the two relevant Group Members.		
NOTE: Future auditors should verify that the federal Recovery Strategies for Red Legged Frogs and Marbled Murrelet, once implemented, have been assessed in relation to the two relevant Group Members		
<input type="checkbox"/> Closed	<input type="checkbox"/> Followed-up but still open	<input checked="" type="checkbox"/> Not followed-up this year
2016 Audit Team Response: The federal recovery strategies were not implemented at the time of the audit.		
2017 Audit Team Response: At the time of the audit, there had been no harvesting on Elkington and Shawnigan Lake School Forests since last audit and no harvesting was being planned for the upcoming months. The Forest Management Plans and the procedures used by the group manager and members include safeguards and procedures to ensure plans and procedures for Species at Risk (SAR) are implemented. This Note remains open so that the next audit team verifies that if operations occurred on these forests and measures included in these plans were implemented if required.		
2018 Audit Team Response: Elkington and Shawnigan Lake School were not within the field audit scope of this year's surveillance audit.		

NOTE 6.1.4/17	Reference Standard & Requirement: Indicator 6.1.4, Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)	
All streams are defaulted to fish-bearing streams (S4) and their status is only changed to non-fish-bearing status if confirmed during field inventories. A stream assessment project has been approved for stream classification on the BLCF forest and completion of the project is expected for Summer 2018.		
NOTE: Future auditors should verify that the stream assessment project has been completed and is being used in the forest management planning and operational processes.		
<input type="checkbox"/> Closed	<input checked="" type="checkbox"/> Followed-up but still open	<input type="checkbox"/> Not followed-up this year
2018 Audit Team Response: Streams are still defaulted to fish-bearing during operational planning.		

NOTE 6.3.12/17	Reference Standard & Requirement: Indicator 6.3.12, Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)	
During the audit, the manager was in the process of applying for a grant for an access management assessment that would provide a more current portrait of access road rehabilitation needs on the certified area.		
NOTE: Future auditors should verify if the access road assessment has been completed and is being used in the forest management planning and operational processes.		
<input checked="" type="checkbox"/> Closed	<input type="checkbox"/> Followed-up but still open	<input type="checkbox"/> Not followed-up this year
2018 Audit Team Response: An access management plan is still underway to address non-timber objectives. Given that the Moose management includes recommendations from qualified specialists to determine road densities/distance to roads (<i>Environmental Values within the Burns Lake Community Forest, 2017</i>) and a lack of an access management plan is perceived to be affecting resource tenure holders within the certificate area, this note has been elevated to an NCR (see NCR 6.3.12/18).		

2.9. New notes as a result of this audit:

NOTE 6.2.2/18	Reference Standard & Requirement: Indicator 6.2.2, Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)	
The <i>Burns Lake Community Forest Mountain Pine Beetle Salvage Chance Planning- 5 year Harvest Sequence Planning</i> indicates harvest plans within Grizzly Bear Management Areas and Mule Deer Winter Range that lead to reductions below conservation targets. Harvesting is proposed in these areas in response to Mountain Pine Beetle (MPB) impacts and subsequent change in forest cover (areas that no longer have the old forest conservation attributes due to MPB). Harvest plans could be contrary to the 2004 Notice 7(2) and management strategies identified within the HCVF assessment.		
NOTE: Future auditors should validate that operational planning follows the recommendations of qualified registered professionals (biologists) relative to the management strategies identified in the HCVF assessment and that denominators for targets are appropriately calculated ahead of harvesting (e.g., HCVF management strategy measures Grizzly habitat based on forest ages >121 years, whereas 5 year Harvest Sequence Planning measures habitat based on forest ages >101 years).		
<input type="checkbox"/> Closed	<input type="checkbox"/> Followed-up but still open	<input type="checkbox"/> Not followed-up this year
2019 Audit Team Response:		

Note 6.3.9/18	Reference Standard & Requirement: Indicator 6.3.9, Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)	
The current FSP lists a 9% in-block retention target for the ESSFmc BEC zone, whereas the standard requires 15% retention within the ESSF within each cutblock area. No block-level planning has occurred (planned in year 2024) to verify whether silviculture or stand level prescriptions meet the retention targets for dominant and co-dominant green tree retention and snags.		
NOTE: Future auditors should review block-level plans to ensure block-level (cutblock area) green tree and snag retention targets are being met.		
<input type="checkbox"/> Closed	<input type="checkbox"/> Followed-up but still open	<input type="checkbox"/> Not followed-up this year
2019 Audit Team Response:		

Note 6.3.10/18	Reference Standard & Requirement: Indicator 6.3.10, Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)	
The HCVF assessment was reviewed by an independent third party with findings that indicate the distribution of seral stages are not compatible with the range of natural variability. The third party review was only completed during the week of the audit, and as such BLCF was not able to respond with any updated management strategies.		
NOTE: Future auditors should ensure the manager has accounted for the most up-to-date information and analysis that characterizes the state of seral stage distributions and ensure that those distributions over time are compatible with RONV.		
<input type="checkbox"/> Closed	<input type="checkbox"/> Followed-up but still open	<input type="checkbox"/> Not followed-up this year
2019 Audit Team Response:		

Note 9.4.3/18	Reference Standard & Requirement: Indicator 9.4.3, Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)	
BLCF Staff interviews identified that, as a result of Mountain Pine Beetle impacts, many of the Old Growth Management Areas (OGMAs) have diminished or lost the old forest conservation attributes which they were originally intended. Staff indicated that formal aerial overview forest health surveys are planned in 2019 with the Ministry of Forests, Lands and Natural Resource Operations that may help qualify (spatially delineate) the intensity and scale of MPB and ensuing blowdown.		
NOTE: Future auditors should validate whether the risk to specific conservation attributes have been qualified, and whether measures have been taken to maintain, enhance or adjust management strategies accordingly.		
<input type="checkbox"/> Closed	<input type="checkbox"/> Followed-up but still open	<input type="checkbox"/> Not followed-up this year
2019 Audit Team Response:		

Note 9.1.4/18	Reference Standard & Requirement: Indicator 9.1.4, Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005)	
Point of diversion (domestic water intakes) are identified as an indicator for HCVF category 3. The auditor was unable to establish whether this value is incorporated into the operational planning (e.g., GIS stusing).		
NOTE: Future auditors should determine whether domestic water intakes are accounted for during operational planning.		
<input type="checkbox"/> Closed	<input type="checkbox"/> Followed-up but still open	<input type="checkbox"/> Not followed-up this year
2019 Audit Team Response:		

3. AUDIT PROCESS

3.1. Auditors and qualifications:

Auditor Name	Nicholas Reynolds, RPF	Auditor role	In charge of all aspects within the audit scope
Qualifications:	Nick is a Registered Professional Forester who has worked with government, industry, academia and First Nations over the last 20 years. Some of his work has included wildlife biology, Growth and Yield establishment and re-measurement, silviculture, forest ecology research, land use planning and teaching. He chaired of the Joint Technical Team for the implementation of the Haida Gwaii Strategic Land Use Agreement, which helped set the legal parameters for protected area management and Ecosystem Based Management for the Haida Nation. Work has also included leading Timber Supply Reviews and forest carbon offset projects. Nick has consulted for Provincial, Territorial and Federal governments in forest policy. He has a Masters in Sustainable Forest Management and is a Lead Auditor in FSC forest management and Lead Auditor for Chain of Custody auditing with Rainforest Alliance.		

3.2. Audit schedule

Date	Location /Main sites	Principal Activities
Oct. 30	Remotely	Stakeholder public and private notifications/consultations
Oct. 26	Remotely	Planning call and audit plan
Nov. 19	On-site	Opening meeting, evidence review, consultation
Nov. 20	On-site	Field visits, Closing meeting
Feb. 6	Remotely	Audit report finalized

Total number of person days used for the audit: 7.75
 = number of days spent in preparation, on site and post site visit follow-up including stakeholder consultation

3.3. Sampling methodology:

A field visit was done on Burns Lake Community Forest and the Marshall Forestry Services' private woodlot. Visits focused on operations completed in the past year, areas of special concerns (ex. stream crossing, HCV, stakeholder consultation, utilization), on-going operations and upcoming operations as well as a review of evidence related to past non-conformances.

3.3.1 List of FMUs selected for evaluation

FMU/Group Member Name	Rationale for Selection
Burns Lake Community Forest	Visits focused on operations completed in the past year, areas of special concerns (ex. stream crossing, HCV,

	stakeholder utilization), on-going operations and upcoming operations.
Marshall Forestry Services woodlot (< 1,000 ha)	SLIMF member

3.4. Stakeholder consultation process

The audit team sent a notice to specific and relevant stakeholders by email and stakeholders were also contacted by phone. The stakeholders were chosen according to the need to assess the impacts of the forest on the local community. The audited member's management staff (and board director) were interviewed based on their field of responsibility relative to the indicators of the FSC standard.

Stakeholder type (i.e. NGO, government, local inhabitant etc.)	Stakeholders notified (#)	Stakeholders consulted or providing input (#)
Government	3	2
Recreation	1	1
Forest Workers	11	9
First Nation	19	1
Environmental	5	1
Unions	0	0
Academic	0	0
Industry	1	1

3.5. Changes to Certification Standards

Forest stewardship standard used in audit:	<ul style="list-style-type: none"> • FSC Regional Certification Standards for British Columbia – Small Operations Standards (2005) • Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005) • Rainforest Alliance Chain-of-Custody Standard for Forest Management Enterprises (FM-35) – August 2013
Revisions to the standard since the last audit:	<input type="checkbox"/> No changes to standard. <input checked="" type="checkbox"/> Standard was changed (detail changes below)
Changes in standard:	Advice Note 18 was published by FSC International on January 1, 2017. This advice note provided requirements for Intact Forest Landscapes (IFL), based on Motion 65. Per Global Forest Watch.org 2000-2013 data, there is no IFL on the certified area.
Implications for FME:	Conformance to new requirements verified

3.6. Review of FME Documentation and required records

a) All certificate types

Required Records	Reviewed
Complaints received by FME from stakeholders, actions taken, follow up communication	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: Ecotrust and the group member audited are proactive in reaching out to stakeholders and strives to maintain a positive relationship with all. Complaint records and follow-up actions have been reviewed.	
Accident records	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: Accident records were reviewed. No major accident or death due to the FM operations occurred since last audit.	
Training records	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: Training records were reviewed.	
Operational plan(s) for next twelve months	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: A sample of operational plans for known operations were reviewed.	
Inventory records	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: Inventory records were reviewed during the interview with the GIS specialist.	
Harvesting records	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: A sample of completed harvests were reviewed.	

b) Group Certificates

Required Group Records	Reviewed
Group management system	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: The group management system was reviewed during interviews with the group manager and though the documentation provided (group procedures). The system in place is able to address conformance issues.	
Rate of membership change within the group	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: One Community Forest was added and four members (all SLIMF) were removed from the group certificate during the audit period.	
Formal communication/written documentation sent to members by the group entity during the audit period	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: The formal documentation and communications are frequent and concern audit results and planning.	
Records of monitoring carried out by the group entity	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: The records of the monitoring done by the group manager were reviewed.	
Records of any corrective actions issued by the group entity	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: The records of past CAR were reviewed by the auditor.	
Updated list of group members	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Comments: The updated list of group members was provided before the audit for the sampling calculations.	

APPENDIX I: FSC Annual Audit Reporting Form:

(NOTE: form to be prepared by the client prior to audit, information verified by audit team)

Forest management enterprise information:			
FME legal name:	Ecotrust Canada		
FME Certificate Code:	RA-FM/CoC – 001758		
Reporting period	Previous 12 month period	Dates	November 2017 to November 2018

1. Scope Of Certificate			
Type of certificate: group	SLIMF Certificate: not applicable		
New FMUs added since previous evaluation	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
Group Certificate: Updated of FMU and group member list provided in Appendix VII-a:			
Multi-FMU Certificate: List of new FMUs added to the certificate scope:			
FMU Name/Description	Area	Forest Type	Location Latitude/Longitude ¹
	ha		
	ha		

2. FME Information	
<input checked="" type="checkbox"/> No changes since previous report (if no changes since previous report leave section blank)	
Forest zone	Sub-Boreal spruce, coastal douglas fir, Interior douglas fir
Certified Area under Forest Type	
- Natural	94,212.20 hectares
- Plantation	0 hectares
Stream sides and water bodies	206.35 Linear Kilometers

3. Forest Area Classification			
<input checked="" type="checkbox"/> No changes since previous report (if no changes since previous report leave section blank)			
Total certified area (land base)	94,212.20 ha		
1. Total forest area	84,420.04 ha		
a. Total production forest area	65,450.32 ha		
b. Total non-productive forest area (no harvesting)	18,969.68 ha		
- Protected forest area (strict reserves)	328.72 ha		
- Areas protected from timber harvesting and managed only for NTFPs or services	0 ha		
- Remaining non-productive forest	18,640.96 ha		
2. Total non-forest area (e.g., water bodies, wetlands, fields, rocky outcrops, etc.)	9,791.96 ha		

¹ The center point of a contiguous FMU or group of dispersed properties that together comprise a FMU in latitude and longitude decimal degrees with a maximum of 5 decimals.

4. High Conservation Values identified via formal HCV assessment by the FME and respective areas

No changes since previous report (if no changes since previous report leave section blank)

Code	HCV TYPES ²	Description:	Area
HCV 1	Forest areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		16.6 ha
HCV 2	Forest 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.		0 ha
HCV 3	Forest areas that are in or contain rare, threatened or endangered ecosystems.		688.20 ha
HCV 4	Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		317.50 ha
HCV 5	Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		0 ha
HCV 6	Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		1,511.22 ha
Number of sites significant to indigenous people and local communities			

5. Workers

Number of workers including employees, part-time and seasonal workers:

Total number of workers	15 workers	
- Of total workers listed above	9 Male	6 Female
Number of serious accidents	0	
Number of fatalities	0	

6. Pesticide Use

FME does not use pesticides. (delete rows below)

² The HCV classification and numbering follows the ProForest HCVF toolkit. The toolkit also provides additional explanation regarding the categories. Toolkit is available at <http://hcvnetwork.org/library/global-hcv-toolkits>.

APPENDIX II: List of visited sites (confidential)

FMU or other Location	Compartment / Area	Site description / Audit Focus and Rationale for selection
Burns Lake K1A BM1 Block 2041	Kager Lake	High retention (50%) salvage within a High Conservation Value (category 5) area for recreational trails and fire abatement; Utilization
Burns Lake K1A BM1 Block 559	Guyishton rd.	Lodepole pine/spruce planted regeneration.
Burns Lake K1A BM1 Block 3130	Guyishton rd.	Winter/temporary road construction; active harvest operations; clearcut silviculture; utilization;
Burns Lake K1A BM1 Block 002-113	Guyishton rd.	Lodepole pine/spruce planted and natural regeneration (free growing)
Burns Lake K1A BM1 Access to Block 3085	Red-Tail rd.	S4 planned stream crossing, inter-drainage culvert crossing
Burns Lake K1A BM1 Block 1008	Opal bed rd.	Utilization, slash piling/fire abatement, recent planting
Burns Lake K1A BM1	Guyishton rd.	7m and 9m permanent bridge crossings
WL470	South block	Active harvesting, utilization, windthrow salvage operations, high retention silviculture, road re-activation, soil management
WL470	Area #2	Intensive silviculture (mechanical emulation of low intensity fire disturbance), pruning, spacing, HCVF retention (snags)
WL470	Bouer creek headwater	Stream restoration/permanent crossing
WL470	Bouer creek headwater	Active harvesting, utilization, high retention silviculture, natural regeneration.

APPENDIX III: List of stakeholders consulted (confidential)

List of FME Staff Consulted

Name	Title	Contact	Type of Participation
Satnam Manhas	Forest and Ecosystem Services Program Manager (Group manager)	604-616-3680 satnam@ecotrust.ca	Interview
Frank Vargas	General Manager R.P.F., Burns Lake Community Forest	250-692-7724	Interview
Ron Harrison	RFT Area Supervisor, Burns Lake Community Forest	250-692-7724	Interview
Michaela Collier	GIS Analyst, Burns Lake Community Forest	250-692-7724	Interview
Karrie Roth	Executive Assistant/Accounting, Burns Lake Community Forest	250-692-7724	Interview
Crystal Fisher	President, Burns Lake Community Forest Association		Interview
Fred Marshall	Chief Forester, Marshall Forestry	fmarshall@xplorenet.ca	Interview
Jane Marshall	General Manager, Marshall Forestry	fmarshall@xplorenet.ca	Interview

List of other Stakeholders Consulted

Confidential. Kept by RA/NEPCon

APPENDIX IV: Forest management standard conformance (confidential)

The table below demonstrates conformance or nonconformance with the Forest Stewardship Standard used for evaluation as required by FSC. The Rainforest Alliance Task Manager should provide guidance on which sections of the standard should be evaluated in a particular audit. Rainforest Alliance may evaluate only a subset of the criteria or principles of the standard in any one particular audit provided that the FME is evaluated against the entire standard by the end of the certificate duration. Findings of conformance or nonconformance at the criterion level will be documented in the following table with a reference to an applicable NCR or OBS. The nonconformance and NCR is also summarized in a NCR table in Section 2.4. All nonconformances identified are described on the level of criterion though reference to the specific indicator shall be noted. Criteria not evaluated are identified with a NE.

P & C	Conformance: Yes/No/ NE	Findings	NCR OBS (#)
Principle 1: COMPLIANCE WITH LAWS AND FSC PRINCIPLES			
1.5	Yes	<i>Following are the findings for the BLCF:</i> The findings from the previous audit remain valid. No illegal activities were reported in 2018. The Organization has an informal procedure for all the staff to declare occurrences of illegal activities. The compliance and enforcement branch of the Ministry of Forests, Lands and Natural Resource Operations began an investigation into a fence within the WL470 SLIMF, with concerns of the fence interring with other range tenure holders (cattle) or wildlife and not being legally tenured. Documentation was provided and reviewed that confirmed that the fence in question was in compliance with relevant legislation as per a 2005 letter from the Arrow Boundary Forest District Manager.	
Principle 2. TENURE AND USE RIGHTS AND RESPONSIBILITIES			
2.3	Yes	<i>Following are the findings for the BLCF and the 4 SLIMF (< 1,000 ha) members:</i> The findings from the previous audits and assessments remain valid. The Ecotrust Group Handbook (2015) contains a dispute resolution policy. Group Members, the Group Manager or the auditor, as defined by FSC, have identified no disputes. Ecotrust has a log to document disputes, though none have been filed to date. Note the conclusion of findings in section 1.5 for WL470 (SLIMF) regarding an alleged non-compliance affecting an adjacent range tenure holder. Interviews with local stakeholders for the BLCF identified no diminishment or threat to forest users tenure and use rights. Review of BLCF <i>Indigenous Community Engagement Framework</i> verifies a clear dispute resolution and grievance procedure specific to three local First Nations. Similarly a <i>Community Engagement Framework</i> for other communities similarly verifies dispute resolution procedures. Ecotrust and the Group Members are in conformance with this Criterion.	

Principle 3. INDIGENOUS PEOPLES' RIGHTS			
3.2	Yes	<p><i>Following are the findings for the BLCF:</i> The findings from the previous audit remain valid. The audit team was able to confirm that First Nations values are identified with the adjacent communities and that protection measures are employed when such values are threatened by forest management practices. The information was confirmed during interviews and field visits. The member is conformant to this criterion.</p>	
Principle 4. COMMUNITY RELATIONS AND WORKERS' RIGHTS			
4.1	Yes	<p><i>Following are the findings for the BLCF:</i> The findings from the previous audit remain valid. The Group Member provide opportunities for employment, training, and other services to local communities. All the workers interviewed were from the region in BC. Documentation was provided to demonstrate local employment efforts. Interviews confirmed that bidding opportunities are provided annually for local companies, which is sourced from a select list of local service providers maintained by the organization. The workers interviewed were satisfied with their salaries and they were judged meeting the industry average in BC.</p> <p>As verified by staff and worker interviews, during the pre-harvest meeting, the member's supervisor goes through all the best management practices necessary to meet the standard, including training for the identification of species at risk and rare or threatened species (as per requirements under 6.2.4). The member provided training to its employees as needed in the past and will do according to new needs. The audit team was able to confirm that, when operational, the member uses local goods. The Group Member is in conformance with this Criterion.</p> <p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i> The findings from the previous audits and assessments remain valid. Interviews with WL470 managers and forestry workers verified that local employment is achieved where practicable (some minor specialty services, such as GIS mapping are procured within a regional/BC context). Interviews with workers identified an awareness of Standards that were immediately pertinent to their operational responsibilities (e.g., safety training, chemical disposal and handling, endangered species) as a result of access to training. All forestry services not conducted by the SLIMF owner/manager are done by independent contractors with a long record of working with the managers.</p>	
4.2	Yes but see 4.2.1	<p><i>Following are the findings for the BLCF:</i> The findings from the previous audit remain valid. The Organization publishes a <i>Safety and Environmental Handbook</i> which details emergency response protocols. The handbook was verified to be in use by forest workers. The audit team was able to verify that there is an implemented health and safety program for all its workers. The employees follow all applicable health and safety regulations in the course of their work. This was confirmed through the documentation provided and interviews with the staff, workers and manager. No dangerous situation was witnessed during the field visit. The organization also maintains a</p>	OBS 4.2.1/18

		<p>corrective action log, that documents all safety issues and measures towards continual improvement. This information was cross checked with a sample minor first aid incident records on file.</p> <p>The audit team was also able to demonstrate a low incident rate for all the employees of the member. One bridge crossing within the BLCF was missing delineators (note that the road was not planned for heavy machinery or hauling). Note that delineators (object markers) are an important safety measure for identifying hazards, leading to Obersvation 4.2.1/18.</p> <p>The Group Member is in conformance with this Criterion.</p> <p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i></p> <p>The findings from the previous audits and assessments remain valid. Interviews with the SLIMF managers and forestry workers confirmed that pre-harvest safety meetings detail the range of potential dangers and means to mitigate dangers (e.g., PPE, communications protocols, steep slope operating procedures, danger tree issues, working near powerlines, transportation/hauling hazards in active range areas etc.). Documentation of independent contractor insurance requirements were reviewed during the audit (e.g., worksafe registration and liability insurance). No safety incidents were reported during the last audit period. Interviews and first aid kit inspections verified that forest workers were in compliance with applicable health and safety regulations. The Group member is in conformance with this Criterion.</p>	
4.3	Yes	<p><i>Following are the findings for the BLCF:</i></p> <p>The findings from the previous audit remain valid. The forest workers interviewed confirmed that the forest managers have not obstructed their rights to organize.</p> <p>The Group Member is in conformance with this Criterion.</p> <p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i></p> <p>The findings from the previous audits and assessments remain valid. The forest workers interviewed confirmed that the forest managers have not obstructed their rights to organize.</p> <p>The Group Member is in conformance with this Criterion.</p>	
4.4	Yes	<p><i>Following are the findings for the BLCF:</i></p> <p>The findings from the previous audit remain valid. The auditor was able to confirm that the member implements a plan for public participation in forest management planning that meets the needs and preferences of interested parties. Documents, including letters of support from a range of community organizations, tenure right holders and forest users indicate a wide range of support.</p> <p>The member, including staff and board, engages in a variety of outreach initiatives, including educational venues, community barbecues and open houses. The member has a communications strategy (<i>Burns Lake Community Forest Corporation community engagement strategy report- 2016</i>). The member also makes available most of the forest management planning on its website. Moreover, for certain rights holders, including First Nations, the member holds specific consultation meetings to make sure to take into account more specific needs.</p> <p>Many examples of values protected resulting from consultation were provided to the audit.</p> <p>The member is in conformance with this criterion.</p>	

		<p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i> The findings from the previous audits and assessments remain valid. The SLIMF member has maintained and updated a stakeholder engagement list. Outreach, particularly to First Nations, has consisted of periodic data and information sharing to local resource stewardship offices. Public forest use within the certified area is limited due to minimal public road access (most access is constrained through private lands). The manager, through the group certificate, has a grievance and dispute resolution mechanism or process outlined within the <i>Forest Management Group Member Handbook</i>. The member is in conformance with this criterion.</p>	
4.5	Yes	<p><i>Following are the findings for the BLCF:</i> The findings from the previous audit remain valid. There were no records or evidence of grievances against any of the group members regarding loss of damage due to forestry activities. The group member is in conformance with this Criterion.</p> <p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i> A grievance from an adjacent range tenure holder was issued through the Provinces Compliance and Enforcement Branch regarding an alleged non-conformance with fencing, however clear documentation indicated full legal compliance by the tenure holder. The grievance was communicated to the Group manager (Ecotrust) as per protocols, however the grievance was resolved through communications facilitated by the local Provincial District office. Field visits verified that the manager in fact improved the adjacent range tenure's access to clean water for livestock by facilitating the restoration of a watering hole and enabling provisions for clean water within the certified area. The member is in conformance with this criterion.</p>	
Principle 5. BENEFITS FROM THE FOREST			
5.6	Yes but see 5.6.6	<p><i>Following are the findings for the BLCF:</i> The findings from the previous audit remain valid. The AAC calculations presented to the auditor included the objectives and strategies of the management plan. The analysis of the sustainable harvest rate is comprehensive and is using the best available information, as outlined with the <i>2017 Timber Supply Analysis Report (With a 7 Generations View)</i>. The AAC calculations included an analysis of the variability and uncertainty of the assumptions and projections. The AAC was adjusted in 2015 to respond to Mountain Pine Beetle that led to an accelerated short term harvest level that reflects primarily dead tree salvage. Provincial Harvest Billings Systems (HBS) records were reviewed and confirmed that the harvest within the last audit period we below the long run sustained yield and approximated the lower mid-term harvest targets, which was in line with goals articulated by staff. The auditor was able to confirm that the next decades of operations will not exceed the long term sustainable harvest rate. The member was able to demonstrate that the adjustment is temporary and that the harvest rate for the next 4 years will not exceed the long term sustainable rate. The 2015 AAC adjustment took place before</p>	OBS 5.6.6/18

		<p>the certification of the forest, hence the member did not have to provide evidence of specific consultation for the adjustment of the AAC.</p> <p>The Group Member is in conformance with this Criterion.</p> <p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i> A catastrophic storm in the summer of 2018 led to major windthrow event throughout WL470. To respond to this event and mitigate risks from Douglas Fir Beetle and maximize utilization of windthrown timber, the manager has developed and implemented salvage operations that may amount to 200 highway trucks within this next year. Field visits during the audit, including interviews with field workers, confirmed the scale and distribution of the windthrow and the selective nature of the salvage operations being limited to dead and down wood. Observation 5.6.6/18 has been issued to ensure that the 5-year average cut does not exceed the long term harvest level. Note that 3 of the 4 SLIMF group members (Shawnigan Lake School, Monticola, Malahat Forest Estates) reported no harvesting of timber within the audit period. The Group Member is in conformance with this Criterion.</p>	
Principle 6. ENVIRONMENTAL IMPACT			
6.2	Yes	<p><i>Following are the findings for the BLCF:</i> The findings from the previous audit remain valid.</p> <p>6.2.1: The members published <i>Safety and Environmental Handbook</i> includes a comprehensive list of endangered and threatened species and is consulted by the forest manager each year prior to operations. The occurrence of these focal species habitat are identified with site plans, and were verified through interviews with staff and forestry workers. The latest HCVF report (Nov. 2017) and the <i>Environmental Values within the Burns Lake Community Forest</i> (May 2017) document contain these lists and the management measures to be implemented if required. PEM data is used for the site series identification for plant communities and seral stages and confirmed through Site Plan surveys and are mapped accordingly.</p> <p>6.2.2: If the species under 6.2.1 are identified on the planned cut blocks per the process described under 6.2.1, buffers are implemented to minimize risk to the long-term persistence of those species and/or plan communities. Many of the red and blue-listed species are located in protected areas. Harvesting is proposed in High Conservation Value Forests for Grizzly Bear and Mule Deer Winter range in response to Mountain Pine Beetle (MPB) impacts and subsequent change in forest cover (areas that may no longer have the old forest conservation attributes due to MPB). Harvest plans could be contrary to the 2004 Notice 7(2) and management strategies identified within the HCVF assessment, leading to NOTE 6.2.2/18.</p> <p>6.2.3: The HCVF report (Nov. 2017) provides a list of species under indicator 6.2.1 and rationale for measures to be implemented where forest management occur on the BLCF. For example, the BLCF area under forest management contains habitat for the survival of the Grizzly Bear (blue-listed) and is managed per the notice of the Nadia Forest District (Section 7(2) Notice 2004). Also, for the Northern Goshawk for</p>	NOTE 6.2.2/18

		<p>which a federal government recovery plan is under development, BLCF is currently implementing a 100 meters minimum buffer around the nest. Further details are provided under the HCVF report Cat. 1 – Section 1-6.</p> <p>6.2.4: Interviews with staff and forest workers confirmed that pre-work planning meetings cover the relevant focal species/species at risk within development areas. Forest workers had access to the <i>Safety and Environmental Handbook</i> published by the Community Forest. Worker awareness, along with chance encounter procedures were also clearly understood by field staff/forestry workers and were appropriate to the scale and intensity of the members operations.</p> <p>6.2.5: BLCF is cooperating with the Wildlife and Compliance Officers if their staff or forest workers if observe such cases for species identified under 6.2.1. The Group Member is in conformance with this Criterion.</p> <p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i> The findings from the previous audits and assessment remain valid.</p> <p>BC Species & Ecosystems Explorer is a tool within the Conservation Data Centre website to identify species at risk and rare ecosystems based on provincial and federal lists. This tool also identifies recovery strategies where these have been developed. The Group Manager and Group Members use it to identify all red-and blue-listed species and plant communities in each FMU prior to implementing operations. These are documented and the managers demonstrated being aware of the recovery strategies. The Group Member is in conformance with this Criterion.</p>	
6.3	No	<p><i>Following are the findings for the BLCF:</i></p> <p>6.3.1: Large areas of the BLCF have been affected by the mountain pine beetle epidemic, resulting in death of large stands of lodgepole pine in BLCF and across the province. Since the early 1990s, about 50% of the total volume of commercial lodgepole pine has been killed (http://www.nrcan.gc.ca/forests/fire-insects-disturbances/top-insects/13381). Considering that most of the recovery of these dead stands is completed, the BLCF has decided to improve its forest management practices based on its updated 2017 documentation, which include: RONV analysis, HCVF report, <i>Environmental Values within the Burns Lake Community Forest</i> report and TSAR.</p> <p>6.3.2: BLCF has a silviculture regime that is composed of an extensive and credible program of surveys: 2 years following harvesting, plantation is implemented; followed 2 years later by a regeneration survey, 5-7 years later by an interim forest stocking survey and 12-15 years later by free-growing assessments. Results of these different surveys allow for BLCF to assure that appropriate regeneration is occurring on disturbed forest lands. Field visits confirmed the implementation of these surveys and proof of success in implementation of regeneration processes. Note that the BLCF has also implemented a western larch program, which in turn is a climate change mitigation effort to assist the migration to the northern limits of western larch. The program follows the Provincial seed transfer guidelines.</p>	<p>NCR 6.3.12/18</p> <p>NOTE 6.3.10/18 6.3.9/18</p>

6.3.3: BLCF is not using site preparation. The manager has a standard operating procedure available if site preparation is forecasted. This procedure allows for the manager to justify which site preparation to use depending among others on site stand series, soil types and moisture. Stocking standards are developed and implemented by BLCF, as outlined within their Forest Stewardship Plan, and guided by the ecological amplitude of accepted and preferred species.

6.3.4: The RONV analysis (2017) and the TSAR (2017) identify a trend towards a natural distribution of seral stages over time. Currently the group member inherited an area with a slight deficit of early seral representation and over-representation of mid-seral forests. Spatial modelling indicates a target for both main BEC zones of approximating the RONV distribution, which is dramatically different then the Provincial status quo. This documentation upon which the management planning process is based, takes into consideration the natural disturbance regimes. It is to be noted that Nadina District identifies concerns that will be integrated in the Forest Health district level strategies, that it will take into consideration when reviewing and approving stocking standards developed by BLCF.

6.3.5: Interviews with group member staff confirmed that there are preferences for natural generation of lodgepole pine, and that spruce and douglas fir are artificially regenerated. BLCF is using its approved stocking standards and its site plans surveys for selection of the most appropriate regeneration method per site. Seed stock and trees are all local provenances (see 6.6). This was confirmed during field visits of blocks currently under regeneration, both at the early establishment phase, and free growing stage.

6.3.6: BLCF is using only natural regeneration or planting from local seed sources. Selection of species is based on the natural stand characteristics. This was confirmed during field visits of blocks currently under regeneration.

6.3.7: Field visits confirmed a diversity of established and free growing tree species compatible with RONV. The rate of harvest, management planning guidelines and stocking standards are applied to the TSAR, which is based on its turn on the RONV analysis and the HCVF report. The TSAR is reviewed every 5 years.

6.3.8: Wildlife Tree Patches (WTP) are targeted for each block up to 10% of the gross block area and meant to reflect the natural range of green tree, snags and other natural stand characteristics (e.g., age, diameter and species distributions). WTP post-harvest implementation is monitored through the use of Unmanned Aerial Vehicles and subsequent image comparison analysis with original site plan spatial designations. Currently the Allowable Annual Cut allocation (particularly the lodgepole pine uplift) guides the site majority of selection, while factoring in restrictions from management strategies for HCVFs. Even though the harvested sites that were visited during the audit were dead lodgepole pine stands that were recovered, the auditor confirmed that the distribution of harvest patches and the remaining residual

structures (wildlife clumps, snags, coarse woody debris) were sufficient considering the ecological and context of the area.

6.3.9: In a context of recovering significant stands of lodgepole pines killed by the mountain pine beetle, BLCF is not maintaining snags of dead trees, due to the fact they are significant fire risks, they have a limited shelf life for production, may slow down the regeneration process and have an impact in water uptake at the watershed scale. However, per the BLCF Forest Stewardship Plan (FSP; June 22 2015) Objective 9, structural diversity in managed stands must be maintained by retaining Wildlife Tree Patches (WTP) in each cutblock, with a minimum of 14% for the BEC SBS zone and 9% of the ESSF zone. Blocks that were recovered are all in the BEC zone of SBS (NDT3, sub-zones: dry-cool (dk), dry-wet (dw3), moist cold (mc2)) zone, while the other zone present on the management unit, ESSF (NDT2) did not have blocks harvested in recent years. The ESSF WTP has a target of 9%, as outlined within the FSP, which is below the 15% of NDT 2 ESSF required by the standard. The 5-year operational plan does indicate harvesting within the ESSF within year 4, however site planning or harvesting have not yet occurred and therefore no evidence to support that operational planning would not account for the 15% stand level retention target in the ESSF. This lower documented stand level retention target is however the basis by which **NOTE 6.3.9/18** has been issued.

6.3.10: The current TSAR is based on the RONV analysis and management strategies to be implemented will use this updated data to meet the requirements of this indicator. Note that a third party review of the HCVF assessment was completed during the week of the audit that provides significant recommendations regarding the group member not meeting seral stage distributions relative to RONV. These results were not able to be reviewed or responded to within this audit period, leading to **NOTE 6.3.10/18**.

6.3.11: The FSP specifies landscape connectivity objective (Obj. 10) based on the stands composition, site series, presence of rare and/or endangered plant communities and stands potential for being landscape corridors. The FSP also contains objectives regarding Old Growth Management Areas (OGMAs). These areas are all mapped and made available to the manager. Furthermore, the management process includes through its HCVF assessment (Cat. 1 – Section 6) and regulations (Notices) in place landscape-level objectives for wildlife habitat (ungulate winter ranges), Visual Quality Objectives and Landscape Connectivity Corridors (LCM).

6.3.12: The *Environmental Values within the Burns Lake Community Forest* provides assessments on rated habitat with the use of current inventories (VIR, LIDAR, PEM) for species such as grizzly bear. Current road access management strategies in the FMP and measures for such species in the HCVF assessment allow for the implementation of measures to protect these species. An access management plan is still underway to address non-timber objectives. The Moose management strategies includes recommendations from qualified specialists to determine road densities/distance to roads (*Environmental Values within the Burns Lake Community Forest, 2017*) and based on stakeholder interviews a lack of an access management plan is perceived to be affecting resource tenure holders and forest users within the

certificate area. Similarly, Grizzly bear habitat is affected by access and best practices measures can mitigate these effects (*HCVF assessment review* by K.Price 2018). Interviews with staff and forestry workers and site visits confirmed that some access management measures are implemented to mitigate non-timber objectives (e.g., road de-commissioning, temporary road access to minimize long term productive forest loss, etc.). However, given the perceived effect on resource tenure and rights holders and effects to access-sensitive species an **NCR 6.3.12/18** has been issued.

6.3.13: Landscape level reserves, such as OGMAs and Landscape corridors have been designed to protect unique ecosystems within the management unit. The HCVF assessment, Environmental report (2017) and the 5 year operational planning project document further identify rare ecosystem types to be considered during operational planning. There was no verifiable evidence to show that some tools (such as PEM rare ecosystems) are being accounted for in operational planning (see related **NCR 9.4.1**).

6.3.14: FSP objective 1 for soils relates to the Forest Planning and Practices Regulations Section 35 and 36, which limits for sensitive soils a disturbance rate of 5%, not predominantly sensitive soils a disturbance rate of 10%. If thresholds are over these limits, the certificate holder must implement rehabilitation. During the audit, field site visits confirmed that these thresholds were not surpassed.

6.3.15: If rehabilitation is required for soil disturbance or temporary access structures, the manager promptly implements measures. During the audit, field site visits confirmed that the 6.3.14 thresholds were not surpassed. The manager ensures that harvest activities only occur in the winter months to mitigate impacts to soil.

6.3.16: The manager is not using any soil fertilizer on cut blocks. Tea bags that are used for road bank stabilization are composed of natural seedings and natural fertilizers (NPK: nitrate, phosphorus, potassium).

6.3.17: The manager is only using natural fertilizers contained within the tea bags for road bank stabilization. Regular inspections are completed by the staff to ensure stabilization of the road bank and crossings and prevent any washing of road bank.
The Group Member is in conformance with this Criterion.

Following are the findings for the 4 SLIMF (< 1,000 ha) members:

There were no changes since the reassessment. The application of the Ecotrust Toolkit by Group Members ensure that strategies are implemented to ensure activities will be compatible with the natural disturbance regime, that soil disturbance and impact on water quality will be minimal. Annual monitoring reports were provided for each group entity and detail compliance with this criterion. Note that WL470 has a site plan target of 2.5 to 3% soil disturbance, which through post-harvest monitoring is met. The Group Member is in conformance with this Criterion.

6.9	Yes	<p><i>Following are the findings for the BLCF:</i></p> <p>6.9.1: No exotics species, including the grass used for erosion control, are being introduced on the BLCF. A review of the seed grass mix confirmed the content did not include exotic species.</p> <p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i></p> <p>6.9.1: No exotics species, including the grass used for erosion control, are being introduced on the BLCF. The group member is an active participant in the local invasive weed committee and conducts extensive manual removal of weeds. A review of grass seed mix identified these were 'weed free'. Past grass mixes (notably the 'Carlson' mix) introduced blue-grass, which was in turn invasive. The Group Member is in conformance with this Criterion.</p>	
Principle 7. MANAGEMENT PLAN			
7.1	Yes	<p><i>Following are the findings for the BLCF:</i></p> <p>The Organization was able to provide all of the aspects required in a management according to 7.1. Most aspects are covered under the <i>Burns Lake Community Forest Management plan #3, Community Forest Agreement K1A, the Forest Stewardship Plan</i> that was approved in December 2017, the <i>Timber Supply Review report (2017)</i>, and the management strategies outlined within the <i>High Conservation Value Forest Assessment</i> report. In so far as 7.1 allows for these indicators to be included within supporting documents, the Group Member is in conformance with this Criterion that is appropriate to the scale and intensity of the operations.</p> <p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i></p> <p>The findings from previous audits and assessments remain valid. A Wooldlot management plan and licence plan remain in effect for the sampled WL470. There has been no change in Group Member's Management Plans since the last audit.</p>	
7.2	Yes	<p><i>Following are the findings for the BLCF:</i></p> <p>The documentation provided to meet the requirements of a management plan will be updated regularly with the best available information and the monitoring results. Past modifications of the plan and AAC calculations are good examples of applications of adaptive management. The Group Member is in conformance with this Criterion.</p> <p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i></p> <p>The findings from previous audits and assessments remain valid. The management plan describes thoroughly how the FSC BC Regional SLIMF Standards will be met. The WL470 management plan is from 2008, however given the very low level of harvest, and the scale and intensity of management on the woodlot (selective harvests that mimic natural disturbance within the range of natural variabilities),</p>	

		periodic revision may not be required on a 5 or even 10 year basis. Note however that the WL licence plan for WL470 is up for revision in 2020. Ecotrust and its members are in conformance with this Indicator.	
7.3		<p><i>Following are the findings for the BLCF:</i> As confirmed through interviews with staff and forestry workers, pre-harvest meetings and ongoing contract supervision (during and post-harvest) with forestry workers and contractors provide sufficient training and supervision to ensure the proper implementation of the management plan. The Group Member is in conformance with this Criterion.</p> <p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i> Findings from previous audits and assessments are still valid. Most of the work is completed by the Woodlot Managers. However, when contractors are brought in for harvesting or road building, they are trained as required to meet the requirements of all activities. Ecotrust and its members are in conformance with this Criterion.</p>	
7.4	Yes	<p><i>Following are the findings for the BLCF:</i> As mentioned in section 4.4, the member renders its non-confidential or sensitive documentation for the management plan publicly by its website, an open-door policy, open houses sessions with free food and meetings with specific rights holders and stakeholders. The stakeholders and rights holder's comments are recorded when in the scope of forest management planning through meeting minutes. The Group Member is in conformance with this Criterion.</p> <p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i> Findings from previous audits and assessments are still valid. Management Plans are typically publicly reviewed when they are prepared and again when they are revised. Typically, no comments are received. Marshall and the Boundary Woodlot Association approached local First Nations (Okanagan band and lower Similkameen band).</p>	
Principle 8. MONITORING AND ASSESSMENT			
8.2	Yes	<p><i>Following are the findings for the BLCF:</i> The member was able to demonstrate that its monitoring program covers all of the following aspects:</p> <ul style="list-style-type: none"> • Volume, species and type of forest products harvested; • Changes to growth rates & site productivity; • Regeneration; • Forest condition & health; • Changes in flora and fauna; 	

		<ul style="list-style-type: none"> • Changes to HCVF strategies, as well as effectiveness monitoring; • Environmental impacts of operations; • Social impacts of operations; and • Financial records <p>The Burns Lake Community Forest <i>Monitoring Plan</i> (2018) identifies the stated values, monitoring methods, frequency and staff responsible. Monitoring results from a number of these indicators are maintained in planting and regeneration records (using the <i>Pheonix</i> database), growth and yield results within the <i>Timber Supply Analysis</i> report, harvesting results tracked through the <i>Harvest Billings System</i>, as well as anticipated changes in forest condition via the <i>5 year operational planning project</i> report. The Group Member is in conformance with this Criterion.</p>	
Principle 9. MAINTENANCE OF HIGH CONSERVATION VALUE FORESTS			
9.4	No	<p><i>Following are the findings for the BLCF:</i></p> <p>The manager has not implemented a specific program to monitor the status of HCVFs and conservation attributes. Clear evidence was provided for the monitoring of the <i>implementation</i> of strategies to protect a number of HCVFs and conservation attributes (see Appendix II, 9.1.4), however no clear program evaluates the effectiveness of the measures employed for their maintenance or restoration of HCVFs. A program that provides replicable (systems-based) feedback to the manager to ensure changes to the status of the HCVF are tracked and management adapted as required. Examples include: the absence of measures to assess stand level retention for red or blue listed ecological communities (HCVF 3) listed within the HCVF assessment; qualifying post-harvest indicators for effective stand structure or habitat requirements for HCVF 1 species (where they interface with operations), or; re-evaluating the effectiveness of moose winter range mapping post-MPB. While not all conservation attributes lend themselves to short-term ongoing (annual) monitoring, a program is required to rationalize the selection, frequency and sampling intensity of monitoring indicators consistent with principle 8. As a result NCR 9.4.1/18 has been issued.</p> <p><i>Following are the findings for the 4 SLIMF (< 1,000 ha) members:</i></p> <p>The findings from the previous audits and assessment remain valid. The group member monitor HCVs through direct observation, looking for blowdown, insect damage, cattle damage, invasive species and other impacts. Rare and threatened species lists are reviewed to see if new species have been identified. This is recorded in the annual Monitoring Report. The intensity and scale of interventions and disturbances in the FMU is so low that it is simple to monitor for the manager. Internal monitoring reports were provided and reviewed in detail for each Group Member.</p>	NCR 9.4.1/18
IFLs	Yes	The Organization was able to demonstrate that there were no IFLs on its members FMUs. The GFWI maps were used to demonstrate that there are no IFLs included in the certified forests.	
Principle 10. PLANTATIONS			

APPENDIX V: Chain-of-Custody Conformance (confidential)

Note: This CoC Appendix is used for FMEs only selling standing timber, stumpage, logs, chips and/or non-timber forest products (NTFPs) produced within a FMU covered by the scope of the certificate. FME certificate scopes that include primary or secondary processing facilities shall include an evaluation against the full FSC CoC standard: FSC-STD-40-004. Refer to that separate report Appendix.

Definition of Forest Gate: (check all that apply)

<input checked="" type="checkbox"/>	Standing Tree/Stump: FME sells standing timber via stumpage sales.
<input type="checkbox"/>	The Log Landing: FME sells wood from the landing/yarding area.
<input type="checkbox"/>	On-site Concentration Yard: Transfer of ownership occurs at a concentration yard under the control of the FME.
<input checked="" type="checkbox"/>	Off-site Mill/Log Yard: Transfer of ownership occurs when offloaded at purchaser's facility.
<input type="checkbox"/>	Other: <i>explanation</i>
<p>Comments: The wood is normally sold at the stump, unless it is sold directly to the mill. In this case, transfer of ownership will be done at the scale (the case of BLCF).</p>	

Scope Definition of CoC Certificate:

<p>Does the FME further process material before transfer at forest gate? <i>(If yes then processing must be evaluated to full CoC checklist for CoC standard FSC-STD-40-004 v2.)</i></p> <p>Note: This does not apply to on-site production of chips/biomass from wood harvested from the evaluated forest area or onsite processing of NTFPs.</p> <p>Comments: The group members will not process material before the forest gate.</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>Is the FME a large scale operation (>10,000 hectares) or a Group Certificate? <i>(If yes then CoC procedures for all relevant CoC criteria shall be documented.)</i></p> <p>Comments: The FME is a group certificate. CoC procedures have been documented.</p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>Does non-FSC certified material enter the scope of this certificate prior to the forest gate, resulting in a risk of contamination with wood/NTFPs from the evaluated forest area (e.g. FME owns/manages both FSC certified and non-FSC certified FMUs)?</p> <p>Comments: Non-certified material does not enter the scope of this certificate prior to the forest gate.</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>Does FME outsource handling or processing of FSC certified material to subcontractors (i.e. milling or concentration yards) prior to transfer of ownership at the forest gate? <i>(If yes a finding is required for criterion CoC 4.1 below.)</i></p> <p>Comments: Outsourcing does not take place prior to transfer of ownership at the forest gate.</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>Does FME purchase certified wood/NTFPs from other FSC certificate holders and plan to sell that material as FSC certified? <i>(If yes then a separate CoC certificate is required that includes a full evaluation of the operation against FSC-STD-40-004 v2.)</i></p> <p>Comments: Group members do not purchase other FSC materials. All material originates from the certified FME.</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>Does FME use FSC and/or Rainforest Alliance trademarks for promotion or product labeling? <i>(If FME does not nor has no plans to use FSC/RA trademarks delete trademark criteria checklist below.)</i></p> <p>Comments: Trademark use procedures (both on- and off-product) are in place. Currently, the FME is only using promotional trademarks. A review of BLCF's website promotional trademark approval documents verified conformance.</p>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Annual Sales Information

Volume of certified product sold as FSC certified (i.e. FSC claim on sales documentation) (previous calendar year)	0
Total volume of forest products harvested from certified forest area during reporting period defined in Appendix I above.	161,154 m ³

Chain-of-Custody Criteria [FM-35 Rainforest Alliance Chain-of-Custody Standard for Forest Management Enterprises (FMEs)]

1. Quality Management	
COC 1.1: FME shall define the personnel/position(s) responsible for implementing the CoC control system.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Each group member is responsible for implementing the CoC system for their FME. For BLCF, the executive assistant is responsible for implementing the CoC control system.	
COC 1.2: All relevant staff shall demonstrate awareness of the FME's procedures and competence in implementing the FME's CoC control system.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Each group member has their own CoC procedure document that outlines all applicable aspects of the CoC system. Interviews with staff confirmed awareness for implementing the CoC system.	
COC 1.3: FME procedures/work instructions shall provide effective control of FSC certified forest products (including NTFPs) from standing timber until ownership is transferred at the forest gate. <i>Note: For large scale operations (>10,000ha) and Group Entities, CoC procedures covering all relevant CoC criteria shall be documented.</i> Including: a) Procedures for physical segregation and identification of FSC certified from non-FSC certified material. (If applicable) b) Procedures to ensure that non-FSC certified material is not represented as FSC certified on sales and shipping documentation. (If applicable) c) Procedures to include the FME's FSC certificate registration code and FSC claim (FSC 100%) on all sales and shipping documentation for sales of FSC certified products. d) Recordkeeping procedures to ensure that all applicable records related to the production and sales of FSC certified products (e.g. harvest summaries, sales summaries, invoices, bills of lading) are maintained for a minimum of 5 years. e) Procedures to ensure compliance with all applicable FSC/Rainforest Alliance trademark use requirements.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Note 1: In the case of group certificates, the Group Manager must ensure Group Members implement CoC control system as defined in documents procedures/work instruction.	
Note 2: In cases where it is not possible or practical to include the FME's certificate registration code on shipping documents, the FMEs procedures shall provide for a clear, auditable link between the material included in the shipment, a FMU included in the scope of the certificate and the applicable sales documentation (i.e. harvest or procurement contract) that includes the required information detailed in c) above.	
Findings: Ecotrust has prepared CoC procedures for each group member based on the same template. The CoC procedures include: a) N/A; b) N/A; c) The inclusion of the group member's FM/CoC code and the FSC claim "FSC 100%" (CoC procedures, Part 4);	

- d) The requirement that records of inputs, outputs, harvest summaries, scale summaries, invoices, bill of lading, and trademark requests will be kept on file and current (Part 2.5). The FM Group Handbook also includes the requirement that these documents be maintained on file for a minimum of 5 years (Part 8.4). Note that BLCF and Marshall Forestry did not have FSC sales during the last audit period;
- e) Details regarding the use and submission of FSC and RA trademarks (Part 5).

2. Certified Material Handling and Segregation

<p>COC 2.1: FME shall have a CoC control system in place to prevent the mixing of non-FSC certified materials with FSC certified forest products from the evaluated forest area, including:</p> <p>a) Physical segregation and identification of FSC certified from non-FSC certified material.</p> <p>b) A system to ensure that non-FSC certified material is not represented as FSC certified on sales and shipping documentation.</p> <p>Note: If no outside wood is handled by FME within scope of certificate, mark as N/A.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
<p>Findings: CoC procedures (Part 3.2) specify that non-FSC certified material are not to enter into the scope of the certificate prior to the forest gate. If the manager operates another non-FSC certified forest, he/she ensures that there will be no non-FSC material entering the FSC log / timber storage area.</p>	
<p>COC 2.2: FME shall identify the sales system(s) or "Forest Gate", for each FSC certified product covered by the Chain of Custody system: i.e. standing stock; sale from log yard in the forest; sale at the buyer's gate; sale from a log concentration yard, etc.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: The Group Manager provided the CoC procedures for two scenarios. One is where logs are sent to sawmills. In this case the forest gate is the buyer's designated scale site. The second case is for pulp logs. In this case dead and pulp logs are chipped on the landing and sent to be scaled at the pulp mill. Ownership is transferred at the stump. These revised procedures adequately describe the different options for log shipment, scaling site and forest gate.</p>	
<p>COC 2.3: FME shall have a system that ensures that FME products are reliably identified as FSC certified (e.g. through documentation or marking system) at the forest gate.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: The provincial timbermark system is used to track logs from the forest to the forest gate. The information on the timbermark (forest license holder, cutting permit, and tenure of origin) is linked to the shipping documentation that accompanies each load.</p>	
<p>COC 2.4: FME shall ensure that certified material is not mixed with non-FSC certified material at any stage, up to and including the sale of the material.</p> <p>Note: If no outside wood/NTPF is handled by FME within scope of certificate, mark as N/A.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
<p>Findings: The group members do not handle or purchase outside wood that could be mixed with certified wood prior to delivery at the forest gate.</p>	

3. Certified Sales and Recordkeeping

<p>COC 3.1: For material sold with FSC claim the FME shall include the following information on sales and shipping documentation:</p> <p>a) FME FSC certificate registration code, and</p> <p>b) FSC certified claim: FSC 100%</p> <p>Note: In cases where it is not possible or practical to include the FME's certificate registration code on shipping documents, the FMEs shall ensure there is a clear, auditable link between the material included in the shipment, a FMU included in the scope of the certificate and the applicable sales documentation (e.g., harvest or procurement contract) that includes the required information detailed above.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: During the audit the inventory and administration systems were reviewed, and these are adequate to ensure that FME FSC certificate registration code, and FSC certified claims: FSC 100% are included. For BLCF and Marshall Forestry there were no FSC sales during the last audit period, therefore no FSC claims on</p>	

sales and shipping documentation. Staff demonstrated an awareness of necessary procedures in the event that FSC sales occur.	
COC 3.2: FME shall maintain certification production and sales related documents (e.g. harvest summaries, invoices, bills of lading) for a minimum of 5 years. Documents shall be kept in a central location and/or are easily available for inspection during audits.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: FSC sales invoices, load slips and tickets, and chip summaries were provided to the assessor by the Group Manager, who maintains them for a minimum of 5 years.	
COC 3.3: FME shall compile an annual report on FSC certified sales containing monthly sales in terms of volume of each FSC certified product sold to each customer. This report shall be made available to Rainforest Alliance staff and auditors during regular audits and upon request.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: The Group Manager maintains a summary of the material harvested and sold as FSC in the FM Member Summary spreadsheet, (MTS spreadsheet) tab 'Harvesting'. Summaries for all group members were reviewed during the audit.	

4. Outsourcing	
COC 4.1: FME shall obtain approval from Rainforest Alliance prior to initiating outsourcing of handling (e.g. storage concentration yards) or processing of FSC certified material to subcontractors.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
CoC 4.2: FME control system shall ensure that CoC procedures are followed at subcontracted facilities for outsourcing and FME shall collect signed outsourcing agreements covering all applicable FSC outsourcing requirements per FSC--40-004 <i>FSC Standard for Chain of Custody Certification</i> . Note 1: If FME outsources processing or handling of FSC certified material the outsourcing report appendix is required. Note 2: Check N/A If FME does not outsource processing or handling of FSC material.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Findings: Processing of material is not outsourced. Hauling may be outsourced. However, transportation is exempt from outsourcing requirements.	

5. FSC/Rainforest Alliance Trademark (TMK) Use Criteria

Standard Requirement: The following section summarizes the FME's compliance with FSC and Rainforest Alliance trademark requirements. Trademarks include the Forest Stewardship Council and Rainforest Alliance names, acronyms (FSC), logos, labels, and seals. This checklist is directly based on the FSC standard FSC-STD-50-001 <i>FSC Requirements for use of the FSC trademarks by Certificate Holders</i> . References to the specific FSC document and requirement numbers are included in parenthesis at the end of each requirement. (Rainforest Alliance Certified Seal = RAC seal).	
General	
COC 5.1: FME shall have procedures in place that ensure all on-product and promotional FSC/Rainforest Alliance trademark use follows the applicable policies:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: CoC procedures (Part 5) include details regarding promotional and on-product trademark use.	
COC 5.2: FME shall have procedures in place and demonstrate submission of all FSC/Rainforest Alliance claims to Rainforest Alliance for review and approval prior to use, including" <ul style="list-style-type: none"> a) On-product use of the FSC label/RAC seal; b) Promotional (off-product) claims that include the FSC trademarks ("Forest Stewardship Council", "FSC", checkmark tree logo) and/or the Rainforest Alliance trademarks (names and seal)(50-001, 1.16). 	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Trademark procedures (Part 5.2) include the requirement for the submission and approval of all on- and off-product FSC & RA trademarks prior to use.	
COC 5.3: FME shall have procedures in place and demonstrates that all trademark review	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

and approval correspondence with Rainforest Alliance is kept on file for a minimum of 5 years.

Findings: Trademark procedures (Part 5.5) include requirements for the maintenance of all trademark review and approval correspondence for a minimum of 5 years. Trademark approvals are also maintained on file with Rainforest Alliance through the Trademark Portal.

Off-product / Promotional

Check if section not applicable (FME does not, and does not plan to use the FSC trademarks off-product or in promotional pieces)

Note: promotional use items include advertisements, brochures, web pages, catalogues, press releases, tradeshow booths, stationary templates, corporate promotional items (e.g., t-shirts, cups, hats, gifts).

When applicable to the FME's promotional/off-product use of the trademarks, the criteria below shall be met:

Yes No

Findings: Ecotrust's website has received trademark approval from Rainforest Alliance. Requirements below have been met.

COC 5.4: If the FSC trademarks are used for promotion of FMUs, FME shall limit promotion to FMUs covered by the scope of the certificate.

COC 5.5: In cases that the Rainforest Alliance trademarks are used (50-001, 6.2):

- a) The FSC trademarks shall not be at a disadvantage (e.g., smaller size);
- b) The FSC checkmark tree logo shall be included when the RAC seal is in place.

COC 5.6: If the FSC "promotional panel" is used, the following elements shall be included: FSC checkmark logo, FSC trademark license code, FSC promotional statement, FSC web site address (50-001, 5.1).

Note: the promotional panel is a prescribed layout with a border available to certificate holders on the FSC label generator site.

COC 5.7: In cases that the FSC trademarks are used with the trademarks (logos, names, identifying marks) of other forestry verification schemes (SFI, PEFC, etc.), Rainforest Alliance approval shall be in place (50-001, 7.2).

COC 5.8: Use of the FSC trademarks in promotion of the FME's FSC certification shall not imply certain aspects are included which are outside the scope of the certificate (50-001, 1.9).

COC 5.9: Use of the FSC trademarks on stationery templates (including letterhead, business cards, envelopes, invoices, paper pads) shall be approved by Rainforest Alliance to ensure correct usage (50-001, 7.3, 7.4 & 7.5).

COC 5.10: In cases that the FSC trademarks are used as part of a product name, domain name, and/or FME name, Rainforest Alliance approval shall be in place (50-001, 9.0, 1.13).

On-product

Check if section not applicable (FME does not, and does not plan to apply FSC labels on product)

APPENDIX VI: Rainforest Alliance Database Update Form

Instructions: For each FSC certificate, Rainforest Alliance is required to upload important summary information about each certificate to the FSC database (FSC-Info). During each annual audit RA auditors should work with the certificate holder to verify that the information posted on FSC-Info is up to date as follows:

1. Print out current Fact Sheet prior to audit from FSC-Info website or direct link to fact sheets (<http://www.fsc-info.org>)
2. Review information with the FME to verify all fields are accurate.
3. If changes are required (corrections, additions or deletions), **note only the changes** to the database information in the section below.
4. The changes identified to this form will be used by the RA office to update the FSC database.

Is the FSC database accurate and up-to-date? YES NO
(if yes, leave section below blank)

Client Information (contact info for FSC website listings)

Organization name			
Primary Contact	Chuck Rumsey	Title	President and CEO
Primary Address		Telephone	514-466-3085
Address		Fax	
Email	chuck@ecotrust.ca	Webpage	ecotrust.ca

Forests

Change to Group Certificate	<input type="checkbox"/> Yes <input type="checkbox"/> No	Change in # of parcels in group	
Total certified area		Hectares	Acres
		95,530.20 ha	

Update members list based on Appendix VII-a below

Species (note if item to be added or deleted)

Scientific name	Common name	Add/Delete

Products

FSC Product categories added to the FM/CoC scope (FSC-STD-40-004a)		
Level 1	Level 2	Species

APPENDIX VII: Group management conformance checklist *FSC-STD-30-005 v1-0* (confidential)

Group Certification Division of Responsibilities

Type of Forest Management Group:	Type I group	
Forest Management Activity	Group Entity	Group Member
Forest management planning	<input type="checkbox"/>	<input checked="" type="checkbox"/>
FMU monitoring activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Forest and resource inventory	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Harvest planning	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Harvesting	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Training of forest workers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Legal compliance (taxes, permitting, etc)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Timber Sales	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marketing	<input type="checkbox"/>	<input checked="" type="checkbox"/>
FSC/RA trademark use (if applicable)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Summary of division of responsibilities: The Group Member is responsible for all activities on the FMU. For the SLIMF portion of the group, the group manager is predominantly involved during the management planning phase and then during trademark use and marketing, as well as for insight and support. For the BLCF, the manager is involved in supporting the monitoring process and trademark use and marketing, as well as for insight and support.		

Quality System Requirements

1.0 General Requirements	
1.1 The Group entity shall be an independent legal entity or an individual acting as a legal entity.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings required if No:	
1.2 The Group entity shall comply with relevant legal obligations, as registration and payment of applicable fees and taxes.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings required if No:	
1.3 The Group entity shall have a written public policy of commitment to the FSC Principles and Criteria.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings required if No:	
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.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: BLCF was added to the group certificate. The group manager has provided significant training and support since BLCF decided to adhere to the group's FSC certificate. The audit team confirmed that such training was implemented through interviews and observations of the staff's knowledge of FSC requirements.	
2.0 Responsibilities	
2.1 The Group entity shall clearly define and document the division of responsibilities between the Group entity and the Group members in relation to forest management activities (for example with respect to management planning, monitoring, harvesting, quality control, marketing, timber sale, etc).	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

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.	
Findings: The Group Manager's responsibilities are outlined in Part 7 of the Handbook. Group Member responsibilities are outlined in Part 8 of the Handbook.	
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.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Satnam Manhas is the FSC Program Manager and has overall responsibility for the implementation of the group requirements. Mr. Manhas will be leaving this position in 2019 and a replacement FSC Program Manager is to be determined..	
2.3 Group entity staff and Group members shall demonstrate knowledge of the Group's procedures and the applicable Forest Stewardship Standard.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: The Group Manager understands the Group's procedures. Evidence provided and discussions with the Group Manager satisfy the requirements of this indicator.	
3.0 Group Entity 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: <ul style="list-style-type: none"> I. Organizational structure; 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); III. Rules regarding eligibility for membership to the Group; IV. Rules regarding withdrawal/ suspension of members from the Group; 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; VI. Documented procedures for the inclusion of new Group members; VII. Complaints procedure for Group members. 	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: The Ecotrust FM Group Handbook includes the following: <ul style="list-style-type: none"> I. The organizational structure is outlined in Section 2.3. II. Responsibilities are outlined in Sections 7 and 8. III. Eligibility requirements are outlined in Sections 3.1, 3.2, 6.1 and 6.2. IV. Rules on withdrawal or suspension are outlined in Sections 6.3 and 6.4. V. Guidelines on corrective action requests are found in Section 6.4. VI. The process for inclusion of new members is in Sections 6.1 and 6.2. VII. Complaints are dealt with in Section 6.5 	
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.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: The Group Handbook includes sufficient information to help ensure that group members are able to understand and fulfill the applicable group membership requirements.	
3.3 The Group entity shall define the personnel responsible for each procedure together with the qualifications or training measures required for its implementation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Satnam Manhas is responsible for the implementation of the group policies and procedures. He is a BC RPF, and has six years' experience with Ecotrust as Program Manager of Community based Projects demonstrating that he is fully qualified.	
3.4 The Group entity or the certification body (upon request of Group entity and at the Group entities expense) shall evaluate every applicant for membership of the Group and ensure that	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

<p>there are no major non-conformances 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>NOTE: for applicants complying with SLIMF eligibility criteria for size, the initial evaluation may be done through a desk audit.</p>	
<p>Findings: New members are required to undergo a Management Plan audit (Handbook Part 4.3), and then if accepted, a field audit (Handbook Part 4.4). This process can inform the Group Manager whether Major non-conformances with any potential new group member exist. Major non-conformances identified at this stage are a precondition to group membership. The Group Manager has implemented this process prior to accepting BLCF in its group.</p>	
<p>4.0 Group Member Informed Consent</p>	
<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> <ul style="list-style-type: none"> I. Access to a copy of the applicable Forest Stewardship Standard; II. Explanation of the certification body's process; 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; IV. Explanation of the certification body's, and FSC's requirements with respect to publication of information; V. Explanation of any obligations with respect to Group membership, such as: <ul style="list-style-type: none"> a. maintenance of information for monitoring purposes; b. use of systems for tracking and tracing of forest products; c. requirement to conform with conditions or corrective action requests issued by the certification body and the group entity d. any special requirements for Group members related to marketing or sales of products within and outside of the certificate; e. other obligations of Group membership; and f. explanation of any costs associated with Group membership. 	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: The Ecotrust FM Member Handbook includes the following:</p> <ul style="list-style-type: none"> I. A copy of the BC standard is provided to all new members as Appendix C. II. The Certification Body process is explained in Part 2.4. III. Access is outlined in Part 4.4 (9) and Part 6.2. IV. Part 7.1 of the Handbook explains that the Group Manager will handle distribution of the audit report. V. Member and manager obligations are explained in Part 6, 7 & 8. 	
<p>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:</p> <ul style="list-style-type: none"> I. include a commitment to comply with all applicable certification requirements; II. acknowledge and agree to the obligations and responsibilities of the Group entity; III. acknowledge and agree to the obligations and responsibilities of Group membership; IV. agree to membership of the scheme, <i>and</i> V. authorize the Group entity to be the primary contact for certification and to apply for certification on the member's behalf. <p>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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: The auditor reviewed all consent forms for existing Group Members and the new member BLCF.</p>	
<p>5.0 Group Records</p>	

<p>5.1 The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include:</p> <ul style="list-style-type: none"> 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; II. Any records of training provided to staff or Group members, relevant to the implementation of this standard or the applicable Forest Stewardship Standard; III. A map or supporting documentation describing or showing the location of the member's forest properties; IV. Evidence of consent of all Group members; V. Documentation and records regarding recommended practices for forest management (i.e. silvicultural systems); 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; VII. Records of the estimated annual overall FSC production and annual FSC sales of the Group. <p>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.</p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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Findings: Records are maintained in several places:

- I. An updated group member list has been provided and is on file with Rainforest Alliance (Ecotrust FM Group Member Summary);
- II. Training records are found in the 'Auditing' and 'Training' tabs of the Group Member Summary;
- III. Maps are found in the management plans for the properties.
- IV. Consent is found on the consent document.
- V. Recommended practices are outlined in the management plans.
- VI. Monitoring records are found in the 'Harvesting' tab of the Group Member Summary, as well as the individual member annual monitoring records.
- VII. Volume records are in the 'Harvesting' tab of the Group Member Summary as well as the individual member annual monitoring records.

5.2 Group records shall be retained for at least five (5) years.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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Findings: Group records are maintained by the Group Manager for at least 5 years.

<p>5.3 Group entities shall not issue any kind of certificates or declarations to their group members that could be confused with FSC certificates.</p> <p>NOTE: Group member certificates may however be requested from Rainforest Alliance.</p>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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Findings: Ecotrust requests from Rainforest Alliance a copy of the certificate for each individual Group Member upon their entry into the group.

Group Features

6.0 Group Size	
6.1 The Group entity shall have sufficient human and technical resources to manage and control the Group in line with the requirements of this standard.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

NOTE: The number of Group members, their individual size and the total area will influence the evaluation intensity applied by the certification body in their annual audits.	
Findings: Currently, the group consists 5 members. Ecotrust has demonstrated the capacity to manage and control the Group. Last year there were 8 members.	
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.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Part 7.6 of the Ecotrust Group Handbook states the maximum group size is 50 woodlots and three larger tenures. Currently, the existing capacity is enough to support the group.	
7.0 Multinational Groups	
7.1 Group schemes shall only be applied to national groups which are covered by the same Forest Stewardship Standard.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>
Findings required if No:	
7.2 The Group entity shall request formal approval by FSC IC through their accredited Certification Body to allow certification of such a group scheme.	Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/>
Findings required if No:	

Internal Monitoring

8.0 Monitoring Requirements	
8.1 The Group entity shall implement a documented monitoring and control system that includes at least the following: I. Written description of the monitoring and control system; 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.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Part 5 and 11 of the Group Handbook describes Ecotrust's internal monitoring strategy. Every year, the Group Manager conducts a phone interview to obtain a general update of the forest, and discuss any forest management issues or concerns. Ecotrust visits a cluster of group members each year and has spent several time supporting BLCF through on-site presence and internal auditing.	
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.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Annual internal monitoring is conducted for all group members and includes either a phone or field audit. At the time of the audit, internal audit reports have been completed for 6 of 9 Group Members	
<p>The Group's procedures (Section 11.0 - 2) indicate that "annual monitoring will be based on a review of all, or a selected set, of the indicators associated with FSC Principle 8." Monitoring criteria are clearly outlined on the annual monitoring form, which is collected from all group members, annually.</p> <p>In addition, section 11.0 – 8 indicates that "a re-assessment' of each member at the indicator level is to be done once every five years" and that a field visit assessment of each member's operation will be conducted once every two years (section 11.0 – 7).</p> <p>Discussions with the Group Manager indicate that annual phone audits with group members focus on the contents of annual monitoring forms, which cover most of the requirements of Principle 8. In addition, the Group</p>	

<p>Manager indicated that other Principles are discussed based on the scope of the FSC annual audit for that year. Internal Audit reports and Master Tracking Sheets were provided and reviewed in detail for each Group Member.</p>	
<p>8.3. The minimum sample to be visited annually for internal monitoring shall be determined as follows:</p> <p>a) Type I Groups with mixed responsibilities (see FSC-STD-30-005 v-1 section D Terms and definitions) Groups or sub-groups with mixed responsibilities shall apply a <i>minimum</i> 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> <p>b) Type II Resource Manager Groups (see FSC-STD-30-005 v-1 section D Terms and definitions) Group entities who also operate as resource managers may define the required internal sampling intensity at their own discretion for the forest properties they are managing, independent of their size and ownership (the minimum numbers as defined above do not apply here).</p> <p>NOTE: for the purpose of sampling, FMUs < 1,000 ha and managed by the same managerial body may be combined into a 'resource management unit' (RMU) according to the proposal made in FSC-STD-20-007 Annex 1.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: Ecotrust's group sampling procedures (FM Handbook, section 11.0 - 1) indicate that internal audits will be conducted for all group members annually. This exceeds the requirements for a Type I group. However, due to the geographical spread of the group, internal audits do not all consist of site visits – internal audits consist of either phone interviews or field visits.</p> <p>The Group Manager has visited BLCF and has been in contact throughout the year with the other members. Note that group members other than BLCF and Marshall Forestry have not conducted any forest harvesting over the audit period.</p>	
<p>FSC-STD-30-005 recommendations for internal monitoring.</p>	
<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.</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>	
<p>8.6 In the selection process of members to be visited, the Group entity should include random selection techniques.</p>	
<p>Comments: The group is small and dispersed enough that group members are clustered into 3 general areas – Vancouver Island, the Kootenays and the Prince George area. Annual site visits tend to focus on a specific cluster, which is appropriate considering the scale of the group member's operations and the distance between clusters.</p>	
<p>8.7 The Group entity shall issue corrective action requests to address non-compliances identified during their visits and monitor their implementation.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings: The Group Manager tracks non-conformances issued to group members via the Ecotrust Member Summary document (tab 'Auditing'). This was reviewed in detail.</p>	
<p>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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/></p>
<p>Findings: No concerns regarding alleged violations or significant problems have arisen to date.</p>	

Group Assessment Requirements: (Completed by RA Task Manager/Lead Auditor)	
Group member size restriction:	50 woodlots and 3 large tenures, as per FM Member Handbook
RA Certificate auditing strategy:	Following FM-01 requirements for group sampling.

APPENDIX VII-a: Certified Group Member/FMU List

(Insert additional rows as necessary for groups with more than 15 members).

1. Total # members in the certified pool: 5
2. Total area in Current Pool (ha. or acres): 95,530.20 ha

CERTIFIED FMU TABLE *(list all FMU included in certificate scope)*

Name of Member/ Contact Details	Assigned Sub Code	Manageme nt Tenure	FMU Location (e.g. town, county)	FMU Latitude/ Longitude ³	FMU area (ha)	Main Products
Malahat Forest Estates (Trust for Sustainable Forestry) - 1975 Renfrew Road, Shawnigan Lake BC, V0R 2W1	D		Shawnigan Lake BC, Canada	N 48° 33' 3..56" W 123° 36' 34 .80"	292.3	Logs, timber,
Marshall Forestry Services (WL0470) - PO Box 2, Midway BC, V0H 1M0	F		Midway BC, Canada	N 49° 02' 42.9966" W 118° 45' 25.6566"	970.4	Logs, timber,
Monticola Forestry Ltd. (WL0408) - PO Box 758, 59 Kootenay Avenue N, Fruitvale, BC,	G		Fruitvale BC, Canada	N 49° 09' 32.24" W 117° 19' 12.74"	583.5	Logs, timber,
Shawnigan Lake School	I		Shawnigan Lake BC, Canada	N 48° 39' 16.23" W 123° 38' 48.01"	64	Logs, timber, pellets, chips, pulp
Burns Lake Community Forest	N		Burns Lake BC, Canada	N 54°13'31.63" W 125°46'0.78".80"	92,302.0	Logs, timber, pellets, chips, pulp fines
Total area in certified pool.					95,530.20	

³ The center point of a contiguous FMU or group of dispersed properties that together comprise a FMU in latitude and longitude decimal degrees with a maximum of 5 decimals.