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Ver October 25 2018

FSC Forest Management

Certification

4th surveillance audit

Report for:

**Ecotrust Canada
Burns Lake Community Forest**

In

Vancouver, BC, Canada

Report Finalized:	January 9, 2020
Audit Dates:	November 19-20, 2019
Audit Team:	Nicholas Reynolds
Type of certificate:	Single FMU
Certificate code:	NC-FM/CoC- 001758
Certificate issue/expiry:	December 31, 2015 December 30, 2020
Organisation Contact:	Chuck Rumsey
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INTRODUCTION

This report presents the findings of an independent certification audit conducted by a specialist representing NEPCon. The purpose of the audit was to evaluate the ecological, economic and social performance of Ecotrust Canada (Burns Lake Community Forest) forest management as defined by the Principles and Criteria established by the Forest Stewardship Council™ (FSC®).

This report contains various sections of information and findings and several annexes. Sections 1-4 of the report will become public information about the forest management operation and may be distributed by NEPCon or the FSC to interested parties. The remainder of the annexes are confidential, to be reviewed only by authorized NEPCon and FSC personnel bound by confidentiality agreements. A copy of the public summary of this report can be obtained on the FSC website at <http://info.fsc.org/>.

Dispute resolution: If NEPCon clients encounter organisations or individuals having concerns or comments about NEPCon and our services, these parties are strongly encouraged to contact relevant NEPCon regional office. Formal complaints and concerns should be sent in writing.

Impartiality commitment: NEPCon commits to using impartial auditors and our clients are encouraged to inform NEPCon management if violations of this are noted. Please see our Impartiality Policy here: <http://www.nepcon.org/impartiality-policy>

1. AUDIT CONCLUSIONS

1.1 Audit recommendation and certification decision

Based on Organisation’s conformance with certification requirements, the following recommendation is made:

Certification approved:
Upon acceptance of NCR(s) issued below

Certification not approved:

Additional comments, including issues identified as controversial or hard to evaluate and explanation of the conclusion reached:

1.2 Non-conformity Reports (NCRs)

Note: NCRs describe evidences of Organisation non-conformities identified during audits. NCRs include defined timelines for the Organisation to demonstrate conformity. MAJOR NCRs issued during assessments/reassessments shall be closed prior to issuance of certificate. MAJOR NCRs issued during anual audits shall be closed within timeline or result in suspension.

Check if no NCR(s) have been issued

NCR: 4.2.1/19	NC Classification: minor
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005) section 4.2.1
Report Section:	Appendix II, Indicator 4.2.1
Description of Non-conformance and Related Evidence:	
<p><u>Requirement:</u> The manager develops and implements a safety program (for all forest workers) to meet or exceed occupational health and safety regulations. The program includes: assessing new forest practices for hazards and developing/communicating appropriate safety measures in relation to them.</p> <p><u>Finding:</u> Safety issues at the 4.8km steel bridge crossing on Guyishton road includes missing delineators and safety curbs. This same issue was noted as an Observation 4.2.1/18 during the last annual surveillance audit. Similar deficiencies were noted within the recent Bridge Inspection Report (file 1938-356-04) by DWB Consulting Ltd. The inspection reports include other crossings that requires attention to similar safety measures (Mackenzie rd 4.6km, Tibbets connector road 7.6km, Spur rd. 9.9km, etc.). As a result of these findings this Observation has been upgraded to a Minor NCR (4.2.1/19).</p>	

<u>Evidence:</u>	
<ul style="list-style-type: none"> • Field visit • Bridge Inspection Reports • Interviews with staff 	
Corrective action request:	<p>Organisation 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 non-conformance.</p>
Timeline for Conformance:	Within 12 months from report finalization date
NCR Evaluation Type	On-site <input checked="" type="checkbox"/> Desk Review <input type="checkbox"/>
Evidence Provided by Organisation:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR: 6.1.3/19	NC Classification: minor
Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005) section 6.1.3
Report Section:	Appendix II, Indicator 6.1.3
Description of Non-conformance and Related Evidence:	
<p><u>Requirement:</u> As part of the operational management planning process for landscapes and/or watersheds in which road-building or timber harvesting is proposed over the next five years, inventories, assessments and/or information databases of ecosystem characteristics, resources and environmental values are completed and/or assembled (see <i>FSC BC Guidance on Inventory</i> for further information). The inventory information should include information covering the following topics at a minimum: ...g) where access-sensitive species or their habitats are present (e.g., grizzly bears, ungulate winter range), assessments to determine measures for the protection of those species and habitats.</p> <p><u>Finding:</u> The 2018 <i>Burns Lake HCVF Review</i> (K.Price) provides a recommendation from a qualified specialist to overlay road networks with Grizzly bear suitability/capability habitat mapping and to use road density as a supplemental indicator to evaluate population stability (<i>Cummulative Effects Framework, Interim Assessment Protocol for Grizzly Bear in British Columbia</i>, 2017). Grizzly bear populations have been identified as at risk across the southern Omineca (overlapping the BLCF FMU) by the Omineca ESI Risk Assessment. Habitat ratings in the BLCF FMU for Grizzly were developed for spring feeding (FD-P) and growing feeding (FD-G) sites that could be used for habitat assessments (<i>Environmental Values within the Burns Lake Community Forest</i>, 2017).</p> <p>Despite these recommendations and the issue of managing access-sensitive species being raised in NCR 6.3.12/18, an assessment to determine measures for the protection of Grizzly and their habitats have not been completed. A specific assessment was completed</p>	

of developmental impacts to the Grizzly Bear Management Area (122 ha) related to section 7(2) FPPR notice (*5-year Harvest Sequence Planning report*, Forsite, 2018), however a broader FMU-scale assessment, as recommended by the 2018 *Burns Lake HCVF Review*, and highlighted by the Omenica ESI Risk Assessment (draft *Burns Lake Community Forest Access Management Plan*, 2019) was not completed.

Interviews with staff indicated that such an analysis is being scheduled in the near future but was not completed during the audit period.

Evidence:

- 2018 *Burns Lake HCVF Review* (K.Price)
- *Cummulative Effects Framework*
- *Interim Assessment Protocol for Grizzly Bear in British Columbia*, 2017
- *Environmental Values within the Burns Lake Community Forest*, 2017
- *Draft Burns Lake Community Forest Access Management Plan*, 2019
- staff interviews.

Corrective action request:	Organisation 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 non-conformance.
Timeline for Conformance:	Within 12 months from report finalization date
NCR Evaluation Type	On-site <input checked="" type="checkbox"/> Desk Review <input type="checkbox"/>
Evidence Provided by Organisation:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

1.3 Observations

Note: Observations are issued for the early stages of a problem which does not of itself constitute a non-conformance, but which the auditor considers may lead to a future non-conformance if not addressed by the organization; observations may lead to direct non-conformances if not addressed.

No observations

OBS: 2.2.1/19	Standard & Requirement:	Forest Stewardship Council Regional Certification Standards for British Columbia - Main Standards (2005) section 2.2.1
	Report Section:	Appendix II, Indicator 2.2.1
Description of findings leading to observation:	<p><u>Requirement:</u> In consultation with local people, the manager identifies, documents and, where appropriate, maps any legal or customary tenure or use rights in the management unit held by one or more people who reside within or adjacent to it.</p> <p><u>Finding:</u> A guide outfitter operating in the FMU changed ownership through a private transaction in 2018. While the transfer was not communicated directly to the manager by the Provincial government, the publicly accessible records of Guide Outfitter Areas and Guiding Certification Number details were recently updated. No developments are planned within the current 5-year harvest plan within the overlapping tenured area. The Organization did not update this transfer of ownership and as a result had not consulted with the use rights holder.</p>	
Observation:	The Organization should ensure continued conformance with indicator 2.2.1.	

1.4 Stakeholder consultation

Specific stakeholders were contacted to gather evidence on conformance with the FSC standards evaluated during this audit. A total of 31 stakeholders were notified during this audit.

Stakeholder Type (NGO, government bodies, local inhabitant, contractor etc.)	Stakeholders Notified	Stakeholders consulted directly or provided input (#)
National/International ENGOS	<input type="checkbox"/>	
Local/Regional ENGOS	<input type="checkbox"/>	
Local Community representatives	<input checked="" type="checkbox"/>	1
Government Agency representatives	<input checked="" type="checkbox"/>	4
Labor Unions	<input type="checkbox"/>	
Indigenous Peoples	<input checked="" type="checkbox"/>	2
Local resource users (trappers, hunt & fish clubs, etc.)	<input checked="" type="checkbox"/>	2
Local recreationalists (tourism, hiking, etc.)	<input checked="" type="checkbox"/>	3
Local businesses	<input type="checkbox"/>	
Contractors	<input type="checkbox"/>	
Workers	<input checked="" type="checkbox"/>	3

The table below summarizes the issues identified by the audit team with a brief discussion of each based upon specific interview and/or public meeting comments.

Principle	Stakeholder comment	NEPCon response
P1: FSC Commitment and Legal Compliance	No outstanding stakeholder issues or complaints that needed to be evaluated by the auditors were reported by FME or discovered by the auditors.	No response needed.
P2: Tenure & Use Rights & Responsibilities	A resource rights user commended the Organization as being supportive, open, communicative and invaluable to help maintaining their access to resource rights.	No response needed.
	One resource rights user that had recently transferred ownership to an existing tenure had not been notified of ongoing developments.	The transfer of Ownership was a private transaction in 2018 with notification to the Government of BC. Publicly accessible references to licences (guide outfitter area data) were recently updated without notification to BLCF. Despite this, indicator 2.2.1 requires the manager to identify tenure and use rights holders within their FMA. See OBS 2.2.1/19 .
	A government agency representative commended the	No response needed.

	<p>Organization as going above and beyond their responsibility to consult and accommodate resource rights users within the FMU.</p> <p>A resource rights user was concerned that the lack of an access management plan, and subsequent access was materially affecting and degrading their resource rights.</p>	<p>An access management plan has been drafted and is undergoing internal review by the BCLF. Confounding its completion has been the need to incorporate the recent Fire Management Plan and developments with other tenure holders (e.g. Coastal Gas Link).</p>
P3 – Indigenous Peoples’ Rights	No outstanding stakeholder issues or complaints that needed to be evaluated by the auditors were reported by FME or discovered by the auditors.	No response needed.
P4: Community Relations & Workers’ Rights	A resource rights user expressed concern that annual operating plans deviate from the 5-year development plans and changes aren’t communicated.	No response needed.
P5: Benefits from the Forest	No outstanding stakeholder issues or complaints that needed to be evaluated by the auditors were reported by FME or discovered by the auditors.	No response needed.
P6: Environmental Impact	No outstanding stakeholder issues or complaints that needed to be evaluated by the auditors were reported by FME or discovered by the auditors.	No response needed.
P7: Management Plan	No outstanding stakeholder issues or complaints that needed to be evaluated by the auditors were reported by FME or discovered by the auditors.	No response needed.
P8: Monitoring & Assessment	No outstanding stakeholder issues or complaints that needed to be evaluated by the auditors were reported by FME or discovered by the auditors.	No response needed.
P9: Maintenance of High Conservation Value Forest	A government agency representative commended the Organization for planning efforts towards establishing new reserves to protect representative old forest ecosystems.	No response needed.
P10 - Plantations	No outstanding stakeholder issues or complaints that needed to be	No response needed.

	evaluated by the auditors were reported by FME or discovered by the auditors.	
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2. AUDIT PROCESS

2.1 Certification Standard Used

Standards Used:	BC FSC FM Standard https://ca.fsc.org/en-ca/standards/forest-management-standards NEPCON Chain of Custody Standard for FM https://www.nepcon.org/library/standard/nepcon-chain-custody-standard-forest-management-enterprises
Local Adaptation: (if applicable)	None

2.2 Audit Team and accompanying persons

Name	Role and qualifications
Nicholas Reynolds	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 NEPCon.

2.3 Audit Overview

Note: The table below provides an overview of the audit scope and auditors. See standard checklist annex for specific details on people interviewed and audit findings per site audited.

Date(s)	Site(s)	Main activities Generic activities provided, to be added / deleted as relevant	Auditor(s)
Nov 1, 2019	Remotely	Preparatory call	N.R.
Nov 19, 2019	On-site	Opening meeting and start of on-site audit	N.R.
Nov 19, 2019	On-site	Field Visits	N.R.
Nov 20, 2019	On-site	Closing meeting and end of on-site audit	N.R.
Total LOE for audit: 3.25 = days for preparation, on-site audit, site visits, stakeholders consultation and follow-up			

2.4 Description of Overall Audit Process

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

FMU Subset Category	# FMU in Subset	Minimum # to visit per FSC-STD-20-007	Actual # FMUs visited	Notes/Comments
FMU above 10,000 ha	1	1	1	Burns Lake Community Forest (92,304.00 ha)

2.4.1 Changes in FMEs' forest management and associated effects on conformance to standard requirements

Since the last audit, Ecotrust Canada removed from its certificate scope the other FMUs, as they will no longer be certified moving forward. Since the 2018 audit report was finalized on January 22, 2019, the certification status for these other FMUs will expire on January 22, 2020. After January 22, 2020, this certificate will transition from a group certificate to a single FMU certificate, since only the Burns Lake Community Forest FMU will be certified. Furthermore, the certificate manager from Ecotrust Canada is now working as an accompanying consultant for Burns Lake Community Forest.

There were no substantive changes in the FME's forest management since the last audit period. The FME is nearing the end of its focus on Mountain Pine Beetle salvage operations (harvesting >70% dead pine) and in the coming years will move towards much higher proportions of green tree harvesting.

2.4.2 List of FMUs selected for evaluation

FMU Name	Rationale for Selection
Burns Lake Community Forest	Only FMU included in certificate

2.4.3 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	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: No complaints led to investigate formal dispute resolution procedures.	
Accident records	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: One major accident was recorded during the audit period (no injuries). See 4.2	
Training records	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: Training records were reviewed.	
Operational plan(s) for next twelve months	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: 5- year development plans were reviewed.	
Inventory records	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Comments: Sample inventory records were reviewed during the audit (e.g. silvicultural survey reports)	
Harvesting records	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: Harvest Billings System data was reviewed.	

2.4.4 List of management aspects reviewed by assessment team

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

3. COMPANY DETAILS

3.1 Certificate Scope

3.1.1 Description

Reporting period:	Previous 12 month period	Dates	Nov 21 2018- Nov 19 2019
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A. Scope of Certified Area			
<input type="checkbox"/> No change since last report			
Forest Management Unit(s) (FMU) within Scope			
Certificate type:	Single FMU		
SLIMF applicability:			
Total # of FMUs:	1		
Total certified area (ha):	92,304.00 ha		
Notes: Since the last audit, Ecotrust Canada removed from its group certificate scope the other FMUs, as they will no longer be certified moving forward. Since the 2018 audit report was finalized on January 22, 2019, the certification status for these other FMUs will expire on January 22, 2020. After January 22, 2020, this certificate will transition from a group certificate to a single FMU certificate, since only the Burns Lake Community Forest FMU will be certified.			
New FMUs			
New FMUs added to scope since last audit?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA <input type="checkbox"/>		
New FMUs (#) :			
New FMUs area (ha) :			
Group certificate - Classification of FMUs per size class			
Size class	# of FMUs	Area per size class (ha)	
SLIMF (< 1000 ha or low intensity)			
1000 – 10 000 ha			
> 10 000 ha			
NOTE: Group certificate: List of FMUs provided in Group Annex below			
Single FMU and Multi-FMUs - List			
FMU Name or ID	Area (ha)	Forest Type	Location Latitude/Longitude
Burns Lake Community Forest (K1A)	92,304.00	Natural	54°13'33N 125°45'42W

B. FSC Product categories included in the FM/CoC scope
<input checked="" type="checkbox"/> No changes since previous report

C. Certified Area Description	
<input type="checkbox"/> No changes since previous report (if no changes since previous report leave section blank)	
1. Total certified area (land base)	92,304 ha
2. Total forested area	84,873 ha

3. Total production forest area (where harvesting occurs)	64,450 ha	
4. Total non-productive forest area (no harvesting)	20,424 ha	
4.a Protected forest area (strict reserves)	329 ha	
4.b Areas protected from timber harvesting and managed only for NTFPs or services	ha	
4.c Remaining non-productive forest (other uses)	20,095 ha	
5. Total non-forested area (e.g., water bodies, wetlands, fields, rocky outcrops, etc.)		7,431 ha
Forest zone	Montane Cordillera	
Certified Area (ha) under Forest Type		
• Natural	92,304.00 ha	
• Plantation		
• Other (specify)		
Stream sides and water bodies (Linear Kilometers)		

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

No changes since previous report

E. Pesticide Use

FME does not use pesticides.

F. List of overlapping forest tenure holders

FME has no overlapping forest tenure holders in scope or no changes since previous audit

3.1.2 Exclusion or excision of areas from the scope of certificate

A. Applicability of FSC partial certification		
<input checked="" type="checkbox"/>	All forest land owned or managed by the FME is included in the scope of the certificate.	
<input type="checkbox"/>	FME owns and/or has management involvement in other forest land/properties (forest management units) not included in the scope of this certificate. If yes, complete sections below in this table.	
Explanation for exclusion of these zones:		
Control measures to prevent contamination of material coming from the FSC certified area:		
Other Forest Area	Location (Name, Coordinates)	Size (ha)

B. Applicability of FSC excision policy (FSC-POL-20-003)	
Excisions VS Removals	
<p>Excisions: are when the certificate holder decides to isolate/separate a part of an FMU(s) from the scope of certificate because this area cannot meet the FSC requirements for reasons either within or beyond their control. Nurseries, areas within the FMU that are influenced / affected by activities from other users that result in non-compliance with FSC requirements (ex. Oil and gas, powerline ROWs, commercial gravel, etc.) are some examples of areas generally needing to be excised.</p> <p>Removals: The selling of, or part of, a property; a change in tenure from public to private land or a change from production forest tenure to non-forest use (such as a governmental disposition of lands to be converted for development of an infrastructure) <i>are not considered excisions</i> as these areas are usually no longer legally within the FMU. These areas are referred to as <u>removals</u> and are rather documented as changes in scope. As such, changes in HA are to be documented in section 3.</p>	
<input type="checkbox"/>	Has any part of the FMUs in scope been previously excised and evaluated against FSC-POL-20-003, AND/OR are being removed from scope by another entity? If yes, complete section 3 of this table.
<input checked="" type="checkbox"/>	Is any portion of the forest management unit (s) under evaluation for certification being removed or proposed to be excised from the scope of the certificate? If yes, complete ALL sections below. Conformance with FSC-POL-20-003 The excision of areas from the scope of certification shall be documented.
<input type="checkbox"/>	Not applicable: The organization has not excised or not does not plan to do an excision, per FSC-POL-20-003.
1. Rationale for new excision of area from FMU(s) included in scope of evaluation	
<p><u>Finding:</u> Description of project: East-west corridor for the Coastal Gas Link through southern sections of BLCF (244.6 ha). The trees harvested within the Coastal Gas Link are being administered under a Master Licence to Cut permit that is not administered by the FME</p>	

manager. Ownership rights to this volume of wood has already been transferred therefore there is no risk of contamination or third-party sales of FSC materials.

2. Findings explaining conformance evaluation against requirements of FSC-POL-20-003

Finding:

The removed area has been evaluated against FSC-POL-20-003 Sections 1.1, 2.1, 3.1, hence the converted has not been excised from the certified area, but the FSC P&C do not apply on this area and the wood harvested from the area was not labelled as FSC certified.

The right-of-way area for the Coastal Gas Link project has been formally withdrawn from the area of the Community Forest by way of a Lands Act Utility Disposition Licence (Gas and Oil Pipeline) being granted, thereby making the area outside the control of the forest manager. The area (244.6 ha) represents a total of 0.25% of the certified area. The proposed removal from the scope of the certificate is for an area that is well defined and mapped making it clearly distinguishable from the remaining FMU.

3. Control measures to prevent contamination of FSC certified wood with non-certified wood from excised/removed forest areas

Finding:

Coastal Gas Link has a Master Licence to Cut Permit from the Government of BC for their disposition licence. The licence is being administered by Coastal Gas Link, including plans for harvesting. An agreement between Burns Lake Community Forest and Coastal Gas Link stipulates terms for the compensation for the loss of access to resources/timber along the 244 hectare right-of-way corridor, and absolves the Burns Lake Community Forest from any liability/responsibility for the timber harvested from this area or silvicultural responsibilities. As such, the timber harvested from the proposed excised site will not be harvested by BLCF and not carry any FSC claims.

4. AUDIT AND NON-CONFORMITY FINDINGS

4.1 Evaluation of Open Non-conformity Reports (NCRs)

Has the management system changed since the previous evaluation:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If yes, briefly review the changes: Since the last audit, Ecotrust Canada removed from its certificate scope the other FMUs, as they will no longer be certified moving forward. Since the 2018 audit report was finalized on January 22, 2019, the certification status for these other FMUs will expire on January 22, 2020. After January 22, 2020, this certificate will transition from a group certificate to a single FMU certificate, since only the Burns Lake Community Forest FMU will be certified. Furthermore, the certificate manager from Ecotrust Canada is now working as an accompanying consultant for Burns Lake Community Forest.	
Have there been any complaints, disputes, or allegations of non-conformity with the standards raised against the Organisation during the audit period:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If yes, reference standard and criteria where corresponding findings are found in report:	

4.2 Evaluation of Open Non-conformity Reports (NCRs)

Note: this section indicates the Organisation's actions to comply with NCRs that have been issued during or since the last audit. Failure to comply with a minor NCR results in the NCR being upgraded to major; the specified follow-up action is required by the Organization or involuntary suspension will take place.

Status Categories	Explanation
CLOSED	Operation has successfully met the NCR
OPEN	Operation has either not met or has partially met the NCR

Check if N/A (there are no open NCRs to review)

NCR#:	6.3.12/1 8	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:				
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.				

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:	Draft Access Management Plan (2019) Boer Mountain Deactivation overview Operational Access Management Plan Map Site plan for BM2 2066 Interviews (staff and regional specialists) Northern Goshawk biologist recommendations HCVF Assessment (2017) HCVF Assessment Review (Price 2018)
Findings for Evaluation of Evidence:	A draft <i>Access Management Plan</i> (2019) and plan map has been developed that identifies measures to meet non-timber objectives. This includes strategies such as road de-commissioning, visual screening (e.g. 10m roadside buffers) or avoidance within specific habitat areas (e.g. Grizzly, Mountain Goat, Goshawk). Despite the <i>Access Management Plan</i> being in draft stage, review of site plan samples verified the implementation of strategies (ex. road deactivation planning at Boer Mountain) consistent with meeting wildlife objectives for moose winter range habitat. Avoidance measures have also been employed for the management of Northern Goshawk (also an access-sensitive species) for a nest found near Steams creek. Given the evidence that access management measures are being implemented the Organization is in conformance with this Indicator.
NCR Status:	CLOSED
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 HCVF 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 HCVF 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</p>				

<p>minimum percentage area for ecosystem representation by BEC variant within the management unit.</p> <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.</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 checked="" type="checkbox"/> Desk Review <input type="checkbox"/>
Evidence Provided by Organization:	<p><i>Old Growth Management Area</i> Replacement Proposal</p> <p>Interviews with regional forest district and BLCF staff</p> <p>HCVF Assessment (2017)</p> <p>5-year (2019-2024) harvest planning in the ESSF (map)</p>
Findings for Evaluation of Evidence:	<p>The Organization has applied to establish a protected area (~1,200 hectares) under an amended <i>Old Growth Management Area</i> (OGMA) Order within the FMU. The proposed OGMA would represent a reserve area that meets the Standards minimum percentage area for ecosystem representation by BEC variant. The proposed reserve area is delineated on maps and has a range of mature forest ages (80-100 year old stands) in addition to old forest, to account for old forest recruitment over time. Reviews of amendment maps, interviews with staff and government representatives confirmed the application is under review by the Province of BC. While the proposed reserve area has not come into legal effect, the Organization has worked within their sphere of influence to ensure ecosystem representation targets are being met. No development is planned in the proposed reserve areas. The requirements for this indicator have been met.</p>
NCR Status:	CLOSED
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</p>				

<p>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>	
<p>Corrective Action Request:</p>	<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>
<p>Timeline for Conformance:</p>	<p>12 months following the report finalization date</p>
<p>NCR Evaluation Type</p>	<p>On-site <input checked="" type="checkbox"/> Desk Review <input type="checkbox"/></p>
<p>Evidence Provided by Organization:</p>	<p>Field visits Site plans Pre/Post harvest imagery Visual Impact Assessment review OGMA amendment proposals, communications and mapping Staff, stakeholder and government agency representative interviews.</p>
<p>Findings for Evaluation of Evidence:</p>	<p>The audit found that, where activities occur within HCVs, or where conservation attributes have substantially changed (9.4.2), effectiveness monitoring was conducted appropriate to the scale of operations. Examples included pre-harvest visual impact assessments (VIAs) and plans for post-harvest VIAs in areas with Visual Quality Objectives (HCV 1). Other examples include forest cover assessments to determine the efficacy of Old Growth Management Areas for representing regionally important old forests (HCV 2). High resolution (5cm) mapping and subsequent determination of high beetle-killed canopies led to an evaluation of more suitable habitat to include within OGMAs (as per 9.4.3). Other examples include post-harvest mapping (e.g. drone surveys and field plots) within high-use recreation areas (HCV 5) to determine stocking levels, fuel loading/risks, trail restoration and qualify stand structure around campsites and biking trails. The requirements for this indicator have been met.</p>
<p>NCR Status:</p>	<p>CLOSED</p>
<p>Comments (optional):</p>	

Annex I: FSC forest management standard conformance (confidential)

The table below demonstrates conformance or non-conformance with the Forest Stewardship Standard used for evaluation as required by FSC. The NEPCon Task Manager should provide guidance on which sections of the standard should be evaluated in a particular audit. NEPCon 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 non conformance 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 the NCR tables in Section 1.2. All non-conformances identified are described on the criterion level though reference to the specific indicator shall be noted. Criteria not evaluated are identified with a NE.

P & C	Confor- mance: Yes/ No/NE	Findings	NCR OBS (#)
Principle 1: COMPLIANCE WITH LAWS AND FSC PRINCIPLES			
1.1	Yes	Forest Stewardship Plan and Forest Management Plan are in place and in accordance with BC statutes. Personnel demonstrate knowledge of legal requirements relevant to their responsibilities. The auditor reviewed a recent exemption that was granted by the Provincial Forest District Manager (under 12(7) of the Forest Planning and Practices Regulation) to allow wildfire mitigation work within areas previously designated with Visual Quality Objectives. 18 Compliance and Enforcement Inspections were completed within the last year, 12 were closed and 4 remain open/outstanding as alleged non-compliances. The auditor reviewed the nature of the ongoing inspections, concluding that they are minor (e.g. Report 123001 hay bales for sediment control need removing), incidental in nature and that the BLCF is responsive to the inspection findings. Note that the number of inspections from the Provincial Forest District compliance and enforcement program on this tenure are several orders of magnitude greater than other tenures of this size typical in B.C (e.g. assuming similar C&E levels of effort are similar to 2016, the 2018/19 BLCF represented approximately 3% of all provincial compliance notices ¹). The Organization is in conformance with this indicator.	
1.2	Yes	Harvest Billings System reports were reviewed and confirmed that stumpage fees to the Crown have been paid. The Organization is in conformance with this indicator.	
1.3	Yes	The Organization maintains a hyperlink listing of the binding international agreements and demonstrates familiarity with those aspects of the agreements that are relevant to their operations. The Organization is in conformance with this indicator.	
1.4	Yes	There have been no situations where the managers compliance with the law precludes compliance with the GSC-BC Regional Standards. The Organization is in conformance with this indicator.	

¹ 2016 Natural Resource Officer Enforcement and Patrol Statistics

1.5	Yes	Interviews with Organization staff and BC Government personnel confirmed that no illegal activities were reported on the FMU during the audit period. The findings from the previous audit remain valid. The Organization is in conformance with this indicator.	
1.6	Yes	The Organization maintains a written commitment to adhere to the FSC BC Regional Standards signed off by a senior authority (General Manager) and posted publicly on their website. The Organizations Management Plan (#3, May18, 2016) details the forest areas over which the manager has responsibility. The Organization is in conformance with this indicator.	
Principle 2. TENURE AND USE RIGHTS AND RESPONSIBILITIES			
2.1	Yes	The Forest Management Plan (#3, 2016) clearly articulates the legal licence for the 25-year renewable area-based tenure (Community Forest Agreement K1A). The CFA licence (renewed in 2014) provides the legal description of the lands and rights in the area, and is publicly available on the BLCF website . The Organization is in conformance with this indicator.	
2.2	Yes	<p>The manager maintains a database of stakeholders that includes people with legal or customary tenure or use rights in the FMU. A guide outfitter operating in the FMU changed ownership through a private transaction in 2018. While the transfer was not communicated directly to the manager by the Provincial government, the publicly accessible records of Guide Outfitter Areas and Guiding Certification Number details were recently updated. No developments are planned within the current 5-year harvest plan within the overlapping tenured area. However, it is the managers responsibility (2.2.1) to ensure the identification of resource rights users in the FMU is updated. See OBS 2.2.1/19.</p> <p>The draft Access Management Plan states that the Organization will obtain resource users 'opinions' about pre and post harvest operations, however the standard requires their consent where any portion of the management plan affects their rights and resources (2.2.2).</p> <p>The Organization is in conformance with this indicator.</p>	OBS 2.2.1/19
2.3	Yes	The findings from the previous audits and assessments remain valid. The Ecotrust Group Handbook (2015) contains a dispute resolution policy. No disputes have been documented within the audit period. The Organization is in conformance with this indicator.	
Principle 3. INDIGENOUS PEOPLES' RIGHTS			
3.2	Yes	The findings from the previous audit remain valid. Seven Indigenous communities are identified within the Management Plan. The Organizations <i>Indigenous Community Engagement Framework</i> outlines clear strategies for open communication to help ensure resources and tenure rights of the First Nations are maintained. Three First Nations are part of the the Community Forest Board of Directors (Office of the Wet'suwet'en (OW), Wet'suwet'en First Nation (WFN), and Ts'il Kaz Koh Nation (Burns Lake Band or BLB). Interviews, field visits, review of correspondences, site plans and engagement policies confirmed that the Organization is in conformance with this indicator.	

Principle 4. COMMUNITY RELATIONS AND WORKERS' RIGHTS			
4.2	No	<p>The Organizations safety and emergency response protocols are detailed within the <i>Safety and Environmental Handbook</i>. Interviews confirmed that forest workers are systematically informed of health and safety risks through pre-work meetings. Incident reporting log and preventative measures logs are maintained by the Organization. One major safety incident occurred during the audit period (skidder rollover) but resulted in no injuries. No contractors during active operations were interviewed during this annual surveillance audit as operations were curtailed due to weather (wet/unfrozen ground). Safety issues at the 4.8km steel bridge crossing on Guyishton road includes missing delineators and safety curbs. This same issue was noted as an Observation 4.2.1/18 during the last annual surveillance audit. Similar deficiencies were noted within the recent Bridge Inspection Report (file 1938-356-04) by DWB Consulting Ltd. The inspection reports include other crossings that requires attention to similar safety measures (Mackenzie rd 4.6km, Tibbets connector road 7.6km, Spur rd. 9.9km, etc.). As a result of these findings this Observation has been upgraded to a Minor NCR 4.2.1/19. The findings from the previous audit remain valid for indicator 4.2.2.</p>	NCR 4.2.1/19
4.4	Yes	<p>The findings from the previous audit remain valid for indicator 4.4.1-4.4.4. The Organizations communications strategy (<i>Burns Lake Community Forest Corporation community engagement strategy report- 2016</i>) remains in effect. Through stakeholder and government agency representative interviews, community organization support letters, online outreach (e.g. online forest management planning information, regular facebook updates), the results of a 2019 public survey (100 respondents), an 'open door' policy at the BLCF office, there remain clear opportunities for ongoing public participation in management planning.</p> <p>Some concerns were raised through stakeholder interviews about changes in the 5-year development plan occurring without notification and uncertainty with how the changes affect their rights or interests. The 2019 Landscape Fire Management Plan represented a significant change for harvest priorities towards implementing fire hazard abatement. The plan is currently being incorporated into updated development plans. It is anticipated that existing referrals, consultation and community engagement mechanisms will be employed to ensure directly affected persons are provided with information used in making management decisions.</p>	
Principle 5. BENEFITS FROM THE FOREST			
5.6	Yes	OBS 5.6.6/18 pertained to harvest operations for the WL470 which is no longer in the FSC group and is closed because it is no longer relevant to the certificate. The findings from the previous audit remain valid for the Burns Lake Community Forest. The Organization is in conformance with this indicator.	
Principle 6. ENVIRONMENTAL IMPACT			
6.1	No	The findings from previous assessments and audits for indicators 6.1.1-6.1.2, and 6.1.4-6.1.10 remain valid. Indicator 6.1.3 (g)	NCR 6.1.3/19

		<p>requires assessments to determine measures for the protection of access-sensitive species or their habitat.</p> <p>The 2018 <i>Burns Lake HCVF Review</i> (K.Price) provides a recommendation from a qualified specialist to overlay road networks with Grizzly bear suitability/capability habitat mapping and to use road density as a supplemental indicator to evaluate population stability (<i>Cummulative Effects Framework, Interim Assessment Protocol for Grizzly Bear in British Columbia, 2017</i>). Grizzly bear populations have been identified as at risk across the southern Omineca (overlapping the BLCF FMU) by the Omineca ESI Risk Assessment. Habitat ratings in the BLCF FMU for Grizzly were developed for spring feeding (FD-P) and growing feeding (FD-G) sites that could be used for habitat assessments (<i>Environmental Values within the Burns Lake Community Forest, 2017</i>). Despite these recommendations and the issue of managing access-sensitive species being raised in NCR 6.3.12/18, an assessment to determine measures for the protection of Grizzly and their habitats have not been completed. A specific assessment was completed of developmental impacts to the Grizzly Bear Management Area (122 ha) related to section 7(2) FPPR notice (<i>5-year Harvest Sequence Planning report, Forsite, 2018</i>), however a broader FMU-scale assessment, as recommended by the 2018 <i>Burns Lake HCVF Review</i>, and highlighted by the Omenica ESI Risk Assessment (<i>Burns Lake Community Forest Access Management Plan, 2019</i>) was not completed. Interviews with staff indicated that such an analysis is being scheduled in the near future but was not completed during the audit period. As a result, a minor NCR 6.1.3/19 has been issued.</p> <p>Note 6.1.4/17 requested future auditors to verify that the stream assessment project has been completed. The auditor was able to review a completed project report (<i>Fish Inventory of 2019-2020 and 2020-2021 Harvest Areas</i>) that included field survey assessments on fish streams (classification and mapping) for 2-years of harvest planning. The assessments have been completed in advance on management activities. The Organization is in conformance with this indicator.</p>	
6.2	Yes	<p>The findings from previous assessments and audits for indicators 6.2.1-6.2.5 remain valid. Note 6.2.2/18 requested future auditors to validate measures in place to minimize risk to the long-term persistence for Grizzly Bear Management Areas and Mule Deer. Review of the section 7(2) notice under the Forest Planning and Practices Regulation and accompanying habitat mapping (OGMA) for Grizzly Bears, 5-year (2019-2024) harvest planning maps and interviews confirmed the Organization is avoiding these areas. While there was proposed harvesting in the Grizzly Bear habitat within the 5-year harvest sequence planning report (Forsite, 2018) this planning seems to have changed, in part to accommodate priorities for implementing fire hazard abatement.</p> <p>Mule Deer habitat, regulated under a separate 7(2) notice for ungulate habitat management, requires a minimum of 50% of</p>	

		<p>the area to be >101 years old. The 2018 harvest sequence planning report identifies that, as a result of mountain pine beetle, all the ungulate winter range habitat within the FMU is below this critical threshold. Proposed harvesting within units Mule Deer winter range were salvage opportunities for Douglas Fir beetle or Mountain Pine beetle affected areas. Three Moose Winter Range polygons have been identified as being below an old forest habitat threshold (e.g. 30% >101 years) but harvest is still planned with anticipated negligible effect. One area of proposed harvest is made up of stands under 101 years (therefore not affecting the threshold), another is dead pine beetle salvage (not providing snow interception cover). Given the landscape level changes from Mountain Pine Beetle, the BLCF have completed updated ungulate winter range polygon mapping (e.g. Keystone Wildlife Surveys Ltd.). Example site plans and road deactivation plans were reviewed for areas managed within the UWR polygons and measures were in place to minimize risk to the species (e.g partial harvest, road screening, road decommissioning).</p> <p>A Northern Goshawk nest was discovered during development planning during this audit period. The area has been deferred from harvesting after consultation with a qualified biologist. In addition, a new Government Action Regulation (GAR) Order came into effect to protect a relatively small area of Mountain Goat habitat (~150 hectares). The area is outside of the Organizations planned harvest developments in the next 5 years. The Organization is in conformance with this indicator.</p>	
6.3	Yes	<p>The findings from the previous audits and assessment remain valid for indicators 6.3.1-6.3.8. Areas managed prior to the Community Forest being established or the FSC certificate being issued are currently in young age classes that may not see active forest management for decades. Beetle kill salvage operations are still underway, and previously managed stands that have been devalued as a result of MPB are being salvaged and regenerated.</p> <p>Regeneration surveys, interim stocking surveys and free-growing assessments are conducted for all harvest areas between 4-15 years after operations. Innovative silviculture survey techniques are being employed within partial harvest sites (deviation from potential cruising standards). Site plans were reviewed, and site visits of interim stocked and free-growing sites confirmed the program is being effectively implemented.</p> <p>Site preparation is restricted to pile burning primarily as a fire hazard abatement measure. Regeneration methods include natural regeneration (where possible for lodgepole pine) and artificial regeneration for spruce and douglas fir using local provenances, as outlined in their stocking standards. Maintaining stand structure, such as coarse woody debris, below the quantities and distribution compatible with RONV, follows the recommendations of their Landscape Fire Management Strategy (Blackwell, 2019) and Community Wildfire Protection Plan. Otherwise review of site plans and field visits identified that</p>	

		<p>Wildlife Tree Patches (WTP) continue to target a range of green tree, snags and other natural stand structures. Post-harvest monitoring (via UAV image surveys) evaluates the implementation of site plans (pre and post retention levels).</p> <p>Their current FSP (2019, amendment #2) stipulates target retention levels within the NDT2 ESSFmc as being >9% (table LS-8), which is 6% below the FSC BC Regional standard for indicator 6.3.9. The 2018 surveillance audit listed this issue as a Note (6.3.9/18) on the grounds that harvesting, and subsequent stand-level planning was in year 4 of a harvest sequence. Correspondence with the manager confirms that these areas will not be harvested in the 5-year development period due to shifts in priorities to fire hazard abatement.</p> <p>The findings from previous audits and assessments remain valid for indicators (6.3.10-6.3.11).</p> <p>A draft <i>Access Management Plan</i> (2019) and plan map has been developed that identifies measures to meet non-timber objectives. This includes strategies such as road de-commissioning, visual screening (e.g. 10m roadside buffers) or avoidance within specific habitat areas (e.g. Grizzly, Mountain Goat, Goshawk). Despite the <i>Access Management Plan</i> being in draft stage, review of site plan samples verified the implementation of strategies (ex. road deactivation planning at Boer Mountain) consistent with meeting wildlife objectives for moose winter range habitat. Avoidance measures have also been employed for the management of Northern Goshawk (also an access-sensitive species) for a nest found within block 3240 near Steams creek. Given the evidence that access management measures have been implemented, the NCR 6.3.12/18 is CLOSED.</p> <p>The findings from previous audits and assessments remain valid for indicators 6.3.13-6.3.17. The Organization is actively managing old forest ecosystems by amending Old Growth Management Area reserves that are no longer effectual due to Mountain Pine Beetle with proposed replacement areas that meet old forest and ecosystems otherwise under-represented in protection. Post-harvest monitoring continues to evaluate the proportion of soil disturbance (e.g. road/trail rehabilitation), with active measures, as validated in the field, to promptly rehabilitate temporary access structures. The Organization is in conformance with this Criterion.</p>	
6.4	Yes	Regarding NCR 6.4.1/18, the Organization is actively working to increase the proportion of the ESSF mc within reserves, while avoiding development within the proposed reserve areas, in order to meet the requirements of this indicator. Therefore NCR 6.4.1/18 is now CLOSED. The requirements for this Criterion have been met.	
6.9	Yes	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.	
		The requirements for this Criterion have been met.	
Principle 8. MONITORING AND ASSESSMENT			
8.2	Yes	The findings from previous audits and assessments remain valid for this Criterion. The Organizations Timber Supply Analysis Report (TSAR) contains current data assumptions regarding forest growth rates. Forest inventory updates (high resolution multi-band imagery) have been completed during the audit period, in addition to systematic pre and post harvest UAV imagery surveys. Forest Health Aerial Overview Surveys were completed during the audit period to help track observed changes in vegetation, in addition to block-level silviculture surveys. Forest health and stocking reports were reviewed during the audit. Tracking of harvested species and grades is completed and reported within the Provincial Harvest Billings System which was verified during the audit. Costs, including stumpage payments, are documented/tracked within the Organizations accounting software (SAGE). The requirements for this Criterion have been met.	
Principle 9. HIGH CONSERVATION VALUE FORESTS			
9.1	Yes	Note 9.1.4/18 requested future auditors to validate whether whether domestic water intakes are accounted for during operational planning. Staff interviews confirmed that registered domestic water intakes are accounted for during operational planning (currently all are outside the FMU). The requirements for this Criterion have been met.	
9.4	Yes	NCR 9.4.1/18 was issued as a result of the Organization not having a program to monitor the effectiveness for the measures employed for the maintenance or restoration of HCVFs or conservation attributes. At the time the Organization had not provided evidence to rationalize the selection, frequency and sampling intensity of applicable monitoring indicators. While not all HCVs lend themselves to annual monitoring, the audit found that, where activities occur within HCVs, or where conservation attributes have substantially changed (9.4.2), effectiveness monitoring was conducted appropriate to the scale of operations. Examples included pre-harvest visual impact assessments (VIAs) and plans for post-harvest VIAs in areas with Visual Quality Objectives (HCV 1). Other examples include forest cover assessments to determine the efficacy of Old Growth Management Areas for representing regionally important old forests (HCV 2). High resolution (5cm) mapping and subsequent determination of high beetle-killed canopies led to an evaluation of more suitable habitat to include within OGMAs (as per 9.4.3). Other examples include post-harvest mapping (e.g. drone surveys and field plots) within high-use recreation areas (HCV 5) to determine stocking levels, fuel loading/risks, trail restoration and qualify stand structure around campsites and biking trails. As a result of these efforts, NCR 9.4.1/18 is CLOSED.	

Annex II: FSC Chain-of-Custody Conformance (confidential)

Note: This CoC Annex is used for FMEs only selling standing timber, stumpage, logs and/or chips 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 Annex.

A. Definition of Forest Gate: (check all that apply)

Forest gate is the point where the ownership of the certified product is transferred to customer.

<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: explanation
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.	

B. Scope Definition of CoC Certificate:

Does the FME further process material before transfer at forest gate? (If yes then processing must be evaluated to full CoC checklist for CoC standard FSC-STD-40-004 v3.) Note: This does not apply to on-site production of chips/biomass from wood harvested from the evaluated forest area.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Comments: No material is processed for sale before the forest gate.	
Is the FME a large scale operation (>10,000 hectares) or a Group Certificate? (If yes then CoC procedures for all relevant CoC criteria shall be documented.)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: CoC procedures are documented for the group certificate.	
Does non-FSC certified material enter the scope of this certificate prior to the forest gate, resulting in a risk of contamination with wood from the evaluated forest area (e.g. FME owns/manages both FSC certified and non-FSC certified FMUs)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Comments:	
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 7 below.)</i>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Comments:	
Does FME purchase certified wood from other FSC certificate holders and plan to sell that material as FSC certified? (If yes then a separate CoC certificate is required that includes a full evaluation of the operation against FSC-STD-40-004 v3.).	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Comments: No other FSC materials are purchased as all material originates from the certified FME.	

Does FME use FSC and/or Rainforest Alliance and/or NEPCon trademarks for promotion or product labeling? (If FME does not or has no plans to use FSC/NEPCon trademarks delete trademark criteria checklist below.)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
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.	

C. Chain-of-Custody Criteria

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: The CoC procedures name Frank Varga as 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: The staff confirmed awareness of the CoC procedures document and requirements to reference it to implement the CoC control system.	
CoC 1.3: FME procedures/work instructions shall provide effective control of FSC certified forest products from standing timber until ownership is transferred at the forest gate. <i>Note: For large scale operations (>10,000ha) and Group Managers, 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 FME 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/NEPCon trademark use requirements. f) Procedures to ensure Transaction verification is supported by providing FSC transaction data, as requested by NEPCon; and g) Procedures to ensure fiber testing is supported by surrendering samples and specimens of materials and information about species composition for verification, as requested by NEPCon. 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.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: Ecotrust has prepared CoC procedures for BLCF and include: a) N/A;	

- b) N/A;
- c) The inclusion of the FM/CoC code and FSC product group claim "FSC 100%" for sales and shipping documents;
- d) The requirement that records of inputs, outputs, harvest summaries, scale summaries, invoices, bill of ladings, and trademark requests will be kept on file and current. The procedures includes the requirements that these documents be maintained for a minimum of 5 years.
- e) Details regarding the use and submission of FSC trademarks.

2. Certified Material Handling and Segregation	
<p>CO C 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 type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/></p>
Findings:	
<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>
Findings: Where logs are sent to sawmills the forest gate is the buyer's designated scale site. For pulp logs, dead and pulp logs are chipped on the landing and sent to be scaled at the pup mill. Ownership is transferred at the stump.	
<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>
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>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 is handled by FME within scope of certificate, mark as N/A.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input checked="" type="checkbox"/></p>
Findings: The Organization does not handle or purchase outside wood that could be mixed with certified wood prior to delivery at the forest gate.	

3. Certified Sales and Recordkeeping	
<p>CO C 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>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
Findings:	

The inventory and administration systems are adequate to ensure that FME FSC certificate registration code, and FSC certified claims: FSC 100% are included. There were no FSC sales during the last audit period, therefore no FSC claims on 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 No

Findings:

No FSC sales occurred during the audit period, nonetheless the procedures manual outline that the Organization maintains records for a minimum of 5 years.

CoC 3.3: FME shall compile an annual report on FSC certified sales for NEPCon containing monthly sales in terms of volume of each FSC certified product sold to each customer.

Yes No

Findings:

The Manager maintains a summary of the material harvested and sold as FSC in the FM Member Summary spreadsheet, (MTS spreadsheet) tab 'Harvesting'. Summaries for the BLCF were reviewed during the audit.

4. Outsourcing

NA

NOTE: Per NEPCon FSC CoC standard for FME (ver 19Dec14), outsourcing requirements do not apply to harvesting and/or transportation conducted by contractors. Outsourcing allowed within the scope of an FM/COG certificate is limited to handling, storage and/or short-term primary processing. Processing is restricted to production of FSC 100% products manufactured from material originating exclusively from FME's forests under evaluation (e.g. custom sawing).

A separate CoC certificate that includes outsourcing in the scope must be obtained for all other subcontracted processing arrangements.

D. FSC Trademark (TMK)/Rainforest Alliance Certified™ seal Use Criteria

<p>Standard Requirements</p> <p>The following section summarizes the FME’s compliance with FSC and NEPCon trademark requirements. Trademarks include the Forest Stewardship Council and Rainforest Alliance and/or NEPCon names, acronyms (FSC), logos, labels, and seals. This checklist is directly based on the FSC trademark standard FSC-STD-50-001 V2-0. References to FSC standard requirement numbers are included in parenthesis at the end of each requirement.</p> <p>NOTE: For former RA certificate holders that continue to use the Rainforest Alliance Certified™ (RAC) seal, auditors shall evaluate conformance with the requirements below for RAC seal use.</p>	
<p>General</p>	
<p>CoC 5.1: In order to use these FSC trademarks, the organization shall have a valid FSC trademark licence agreement and hold a valid certificate. (1.2)</p> <p>NOTE: Organizations applying for forest management certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings:</p> <p>CoC procedures include details regarding promotional and on-product trademark use.</p>	
<p>CoC 5.2: The organization shall submit all intended uses of FSC and/or the Rainforest Alliance trademarks (names and seal) to NEPCon for approval. (1.5)</p> <p>NOTE: Organizations using the NEPCon Community site in Salesforce for trademark submissions may use the records saved on the site as evidence to demonstrate conformance to this clause.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings:</p> <p>Trademark procedures include the requirement for the submission and approval of all on-and off-product FSC & RA trademarks prior to use.</p>	
<p>CoC 5.3: The products which are intended to be labelled with the FSC on-product label or promoted as FSC certified shall be included in the organization’s certificate scope and shall meet the eligibility requirements for labelling, as stipulated by the respective FSC standard. (1.6)</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
<p>Findings:</p>	
<p>CoC 5.4: The FSC trademarks shall not be used (2.1):</p> <ul style="list-style-type: none"> a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme; b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the organization, outside the scope of certification; c) to promote product quality aspects not covered by FSC certification; d) in product brand or company names, such as ‘FSC Golden Timber’ or website domain names; e) in connection with FSC controlled wood– they shall not be used for labelling products or in any promotion of sales or sourcing of FSC controlled wood; the initials FSC shall only be used to pass on FSC Controlled Wood claims in sales and delivery documentation, in conformity with FSC chain of custody requirements. 	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Findings:</p>	
<p>CoC 5.5: FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>

before the products go to the final point of sale, or are delivered to uncertified organizations. (4.6)	
Findings:	
CoC 5.6: Organizations are responsible for compliance with national labelling requirements and consumer protection laws in those countries in which FSC-certified products are promoted, distributed, and sold and in which promotional materials are distributed. (3.5 and 5.6)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
NOTE: FSC certification audits do not address compliance with such national requirements and laws.	
Findings:	

<i>Findings:</i>
On product use <input checked="" type="checkbox"/> Check if section not applicable (Organization does not, and does not plan to use the FSC trademarks on-product)

Off-product / Promotional <input type="checkbox"/> Check if section not applicable (Organization 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, mugs, hats, gifts).	
CoC 5.13: If the FSC trademarks are used off-product, the Organization shall ensure: all compulsory elements shall be present when promoting either the FSC logo or the "Forests For All Forever" marks. The elements may also be presented separately, for example on different parts of a web page. One use of an element (e.g. license code) per material is sufficient. (5.2, 5.3, and 5.4) The FSC trademarks shall not be used in a way that implies equivalence to other forest certification schemes (e.g. FSC/xxx certification). (7.1) The FSC logo or 'Forests For All Forever' marks shall not be used on business cards for promotion. A text reference to the organization's FSC certification, with licence code, is allowed, for example "We are FSC® certified (FSC® C#####)" or "We sell FSC®-certified products (FSC® C#####)". (7.3) FSC-certified products shall not be promoted with the certification body logo alone. (7.4)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Findings: BLCFs website has received trademark approval from NEPCon. Requirements have been met.	
CoC 5.14: Organizations shall take full responsibility for the use of the FSC trademarks by investment companies and others making financial claims based on their FSC-certified operations. Any such claims shall be accompanied by a disclaimer: "FSC® is not responsible for and does not endorse any financial claims on returns on investments." (6.6, and 6.7)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
CoC 5.15: When applicable to the Organization's promotional / off-product use of the trademarks, the criteria below (3.4 – 3.10) shall be met:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
CoC 5.16: When referring to FSC certification without using FSC logo or 'Forests For All Forever' marks, the license code shall be included at least once per material. (5.5)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
CoC 5.17: It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc. (6.1)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

<p>a) If they list both FSC-certified and uncertified products, a text such as “Look for our FSC®-certified products” shall be used next to the promotional elements and the FSC-certified products shall be clearly identified.</p> <p>b) If some or all of the products are available as FSC certified on request only, this shall be clearly stated.</p>	
<p>CoC 5.18: If the FSC trademarks are used for promotion on invoice templates, delivery notes, and similar documents that may be used for FSC and non-FSC products, the following or similar statement shall be included: “Only the products that are identified as such on this document are FSC® certified.” (6.2)</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
<p>CoC 5.19: The FSC logo with the license code may be used on promotional items not for sale, such as mugs, pens, T-shirts, caps, banners, and company vehicles.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
<p>CoC 5.20: If promotional items are made wholly or partly of wood (e.g. pencils or memory sticks), they must meet the applicable labelling requirements as specified by FSC-STD-40-004, but do not need to carry an on-product label.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
<p>CoC 5.21: When FSC trademarks are used for promotion at trade fairs, the organization shall:</p> <p>a) clearly mark which products are FSC certified, or</p> <p>b) add a visible disclaimer stating “Ask for our FSC®-certified products” or similar if no FSC-certified products are displayed.</p> <p>Text used to describe the FSC certification of the organization does not require a disclaimer.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>
<p>CoC 5.22: When used on the same promotional material as marks of other certification schemes, the FSC trademarks shall not be used in a way which disadvantages FSC in terms of size or placement. (7.2)</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>

Annex III-a: List of all visited sites (confidential)

	New FMU <i>If yes, put an X</i>	FMU	Block/sector	Description of site audited <i>Ex. Justification for selection, type of operations, workers met, machines inspected, etc.</i>
1.		K1A	Block 206	Campground expansion. Recreation HCV area.
2.		K1A	Block 2066	Fuel hazard abatement (partial harvest). Recreation HCV area (Boer mountain biking trails)
3.		K1A	Block 2601	Fuel hazard abatement (partial harvest). Recreation HCV area. (Boer mountain biking trails). Temporary crossing de-activation.
4.		K1A	Block 2069	Clearcut and fuel hazard abatement. Example of fibre utilization, site preparation (pile burning).
5.		K1A	Block 2048	Clearcut and fuel hazard abatement. Road de-commissioning (re-contour) for HCV.
6.		K1A	Block 3252	Planned fire hazard abatement block (salvage).
7.		K1A	Guyishton rd.	Inter drainage crossing
8.		K1A	Guyishton rd. 4.8km	Steel bridge crossing
9.		K1A	Mackenzie crossing 7km	Permanent Bridge.

Annex IV: Detailed list of stakeholders consulted (confidential)

List of FME Staff Consulted

Name	Title	Contact	Type of Participation
Satnam Manhas	Consultant to BLCF	604-616-3680 satnammanhas@gmail.com	Interview
Frank Vargas	General Manager R.P.F., Burns Lake Community Forest	frank.varga@blcomfor.com 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
Paul Davidson	Burns Lake Community Forest Board member	250-692-7724	Opening & Closing meeting
Colleen Piper	Executive Assistant	250-692-7724	Opening & Closing meeting

List of other Stakeholders Consulted

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