

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

Minnesota Department of Natural Resources
Minnesota, USA

SCS-FM/COC-00088N
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St. Paul, MN 55155-4040 USA
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31 December 2015	31 December 2021

DATE OF FIELD EVALUATION
30 November – 3 December 2020
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Foreword

Cycle in annual surveillance evaluations				
<input type="checkbox"/> 1 st annual evaluation	<input type="checkbox"/> 2 nd annual evaluation	<input type="checkbox"/> 3 rd annual evaluation	<input type="checkbox"/> 4 th annual evaluation	<input checked="" type="checkbox"/> Other (5 th surveillance (COVID Extension):
Name of Forest Management Enterprise (FME) and abbreviation used in this report:				
Minnesota Department of Natural Resources, MNDNR, DNR or FME				

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

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

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

Organization of the Report

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

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Evaluation Team

Auditor name:	Brendan Grady	Auditor role:	FSC Lead Auditor & SFI Team Auditor
Qualifications:	Mr. Grady is the Director, Forest Management Certification for SCS. In that role, he provides daily management and quality control for the program. He participated as a team member and lead auditor in forest certification audits throughout the United States, Europe, and South East Asia. Brendan has a B.S. in Forestry from the University of California, Berkeley, and a Juris Doctorate from the University of Washington School of Law. Brendan is a member of the State Bar of California, and was an attorney in private practice focusing on environmental law before returning to SCS.		
Auditor name:	Tucker Watts	Auditor role:	SFI Lead Auditor & FSC Team Auditor
Qualifications:	Tucker Watts is a partner in Watts Consulting LLC. His primary focus is forest certification through auditing. Since 2008, Watts has been involved with SFI Forest Management, Fiber Sourcing, Certified Sourcing, and Chain of Custody auditing, FSC Forest Management and Chain of Custody auditing, Programme for the Endorsement of Forest Certification Chain of Custody auditing, auditing of the American Tree Farm System's Group certification, auditing of the Responsible Procurement Program of the National Wood Flooring Association and auditing of the Sustainable Biomass Partnership. Watts has 30 years of experience in forest management with a large forest products corporation involved in the manufacturing of paper, lumber and plywood. For 10 years, Watts was a system manager for the forest certification system.		
Auditor name:	Stefan A. Bergmann	Auditor role:	FSC & SFI Team Auditor
Qualifications:	Mr. Bergmann has been in the forestry and wood products field for nearly 20 years, working across the US on forest policy, landowner extension, and forest certification. He also has senior staff executive experience with two forestry non-profits in the Midwest. Prior to joining SCS in 2017, he worked for Rainforest Alliance, overseeing the Forest Stewardship Council® (FSC®) Forest Management auditing program in the US. He has successfully completed FSC Forest Management Lead Auditor training, ISO 9001 Lead Auditor training, and is qualified to be an SFI team auditor. He has served as lead and team auditors on numerous FSC FM audits around the country. He holds a BS in Wildlife Science and an MS in Forest Resources, both from Oregon State University, and recently completed an MBA at the University of California Davis.		

1.2 Total Time Spent on Evaluation

Number of days spent on-site for evaluation:	4
Number of auditors participating in on-site evaluation:	3
Number of days spent by any technical experts (in addition to amount in line A):	0

Additional days spent on preparation, stakeholder consultation, and follow-up:	4
Total number of person days used in evaluation:	17

1.3 Standards Used

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

Standards applicable <i>NOTE: Please include the full standard name and Version number and check all that apply.</i>	<input checked="" type="checkbox"/> Forest Stewardship Standard(s), including version: FSC-US Forest Management Standard v 1-0
	<input checked="" type="checkbox"/> FSC Trademark Standard (FSC-STD-50-001 V2-0)
	<input checked="" type="checkbox"/> SCS COC indicators for FMEs, V8-0
	<input type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	<input type="checkbox"/> Other:

2. Certification Evaluation Process

2.1 Evaluation Itinerary, Activities, and Site Notes

Monday, November 30, 2020

FMU / location / sites visited	Activities / notes
Virtual Meeting	Opening Meeting: Introductions, client update, review scope of evaluation, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and review of open CARs/OBS, emergency and security procedures for evaluation team, final site selection.
Virtual Meeting	Documentation and record review, review of field sites recordings, interviews with DNR staff, exact schedule to be determined

All timber sales were reviewed virtually during this audit due to the COVID-19 Pandemic. For all timber sales the following documents were provided to the auditors. Documents were reviewed and discussed during the review of video footage of the sale.

- Permit to Cut Timber (FSC and SFI Claim and Certification # stated)
- Timber Appraisal Report
- Site maps
- Cutting Block Report
- SEL Stand Data Summary
- A video recorded within a month of the audit providing an overview of the sale

A sample of the following were reviewed for each Management Area:

- Single Permit Activity Report
- Permit Supervision Record

Tuesday, December 1, 2020: Aitkin Area

FMU / location / sites visited	Activities / notes
X015495, completed harvest	<p>90-year-old, mesic soil type northern mixed hard stand. Site index is 70 with advanced regen. Hardwood shelterwood thinning occurred in September 2017 using cut-to-length operation. Harvest targeted basswood, maple, aspen, and balsam while reserving red oak, yellow birch, and orange painted trees; primary goal was to capture value (for example, basswood was in decline). Aimed to also prevent damage to advanced regeneration. Intent to capture value (basswood was declining). Orange painted trees were distributed across the site in clumps and scattered to maintain even spacing and were focused on large diameter sugar maple and basswood.</p> <p>Logger harvested only one-third of the timber (primarily basswood) before the permit expired and closed. No residual stand damage or sign of erosion observed along logging trails or elsewhere in unit. Completely untouched/reserve areas on steeper ground had been excluded from the prescription. Property boundary line marked with blue paint. Snowmobile trail cuts across the northern tip of the stand; trail was not impacted due to how the operator accessed the stand. Trust land.</p>
F011855	<p>Aspen Clearcut, April 2018 harvest. All maple, conifer and other species reserved from harvest.</p> <p>Access to the site was through private land, frozen ground harvesting only. Sale was only 2 acres, offered as an informal sale. Blue paint line marked out reserve area. Retention strategy was to keep a clump on the perimeter and then scattered reserved trees throughout the stand. Aspen regen was 12-15 ft after two growing seasons.</p>
X016538	<p>Thinning of Northern Hardwood and Oak. Gaps in less productive areas to create age class diversity. There was an optional timber sale area of low BA and low-quality trees associated with this sale. Leave trees were marked. Goal was to create regeneration opportunities. Intermediate Auction Sale sold to [Logging Company, name removed for privacy]. SFI and FSC Claim and CoC # stated in Permit. Harvesting by conventional equipment. Goal to reduce BA to 90-100. Due to snow, not all of site was harvested. Residual stand well protected. Sale boundary clearly identified. Wildlife trees selected included den trees, and snags. Access controlled by gate. Harvest is associated with HCVF on some parts. Aspen and Birch is being removed to create age class diversity and</p>

	increase oak stand composition. No issues identified during remote observation of sale.
X016077, planned harvest	<p>Unit abuts State Highway 200 and also crosses Split Hand Forest Road. Single tree selection unit marked to cut with orange paint. Goal is to release crop trees, increase quality of stand, and promote oak and yellow birch regen. Post-harvest BA will be 90 to 100 sq-ft/ac. Oak, birch, well-formed sugar maple and basswood, and legacy conifers and other wildlife trees will be retained. Sale boundary marked with blue paint. A visual buffer along the state highway is planned.</p> <p>SMZ old growth stand abuts the north edge of the stand. Stand is considered HCVF and management is intended to maintain older growth stages on the landscape and canopy closure for red-shouldered hawks. Recently harvested aspen clearcut adjacent to stand to the west. Unit will likely be harvested with cut-to-length operation, as no whole tree skidding is allowed in order to protect advanced regen of oak.</p>
Prescribed fire for oak regeneration	<p>Reviewed the document, <i>Aitkin Forestry Rx Fire for Oak Regeneration (Internal Audit Discussion 5/18/20)</i> and had conversation with DNR personnel involved in these projects.</p> <p>To regenerate oak on DNR land in Aitkin County, the agency has implemented prescribed fire projects. As oak forests on these lands were established post white settlement, they are considered mature at 80+ years old and nearing the end of the age class curve. Prescribed burning has been used to provide a more suitable seedbed for oak and to remove some of the understory and mid-story shade tolerant competition such as sugar maple and ironwood. This will increase light levels in the understory such that acorn crops can survive beyond the first growing season (a germinant needs at least 8% of available light).</p> <p>In the past three years, the DNR has completed five burns for covering approximately 112 acres in total. Burn site prep includes brushing out control lines, dropping snags, and creating a fuel-free fire break with a leaf blower. Control lines are located to take advantage of natural fire breaks and to complete the most acres with the least amount of line needed. Burns have been funded from the agency's fire and silviculture funds.</p> <p>Little formal monitoring has been completed on the burned areas, anecdotal examination shows that after just one burn, much more light reaches the understory. Research suggests that the effects of a burn can last up to ten years.</p> <p>Having a 10-year management plan allows the DNR to target oak stands to be harvested down the road. By burning these targeted</p>

	stands now, they will be in a condition to begin regeneration when they come up on the stand exam list in the future. Over the next three years, the DNR is planning to conduct 18 prescribed fires that will cover 810 acres total.
X017007, completed harvest	<p>Aspen clear cut harvested in July 2020. Unit was sold as an intermediate sale for a smaller operator. Stand also included maple, paper birch, and basswood. This is an HCVF; the identification of a red shouldered hawk led to two or three 10-in DBH basswood and one of two maple per acre. The goal was to maintain as much canopy closure as possible to support the reserved oak and scattered maple and basswood along with all conifers. Also retained were snags and den trees for wildlife. Logger used conventional equipment and a track buncher. Slash was clean chipped. Regen already evident from harvest.</p> <p>Skid trails in good condition with no sign of rutting or residual stand damage. Haul road for unit is properly ditched to control overland flow. Road is not blocked off because it comes across adjacent private land. Landing used for the harvest was also in good condition. Logger had used slash to protect soil at a crossing of an Intermittent stream. No evidence of compaction, rutting, or erosion found at the crossing nor elsewhere in the unit.</p> <p>Reviewed Revised Permit to Cut dated 9 January 2020 with expiration of 31 May 2022; Timber Appraisal Report, reappraised 8 July 2020; site maps; Sealed Bid Award Form; Cutting Block Report, and Stand Data Summary.</p>
B014220, completed harvest	<p>Aspen clear cut divided into two blocks. Block 1 included clump reserves with retention of snags. Prescription for this block was to harvest all aspen, red maple, sugar maple, paper birch, basswood, and burr oak. Landing with clean chips spread across it in good condition. As this was a winter harvest, the wood was stockpiled with some hauled during the winter and the remaining hauled after spring breakup. Block was harvested in February and March of 2020, with the southern portion harvested in November and December of 2019. This block is also in a WMA. Block includes a hunter walking trail, and special effort was made to not impact the trail with skid trails.</p> <p>Block 2 had no reserves. Harvested all aspen, ash, burr oak, paper birch, and tamarack. No reserves because it was harvested in order to benefit ruffed grouse. The harvest is also in a WMA. All standing trees were harvested, and snags cut down (for the benefit of grouse). Harvested in February and March of 2020 with conventional equipment, including a track buncher. It was clean chipped. High stem density and suckering across the site is evident. Boundary of unit marked with blue paint and flagged with pink ribbon.</p>

	<p>Skid trails in good condition with no evidence of rutting or erosion on either block.</p> <p>Reviewed Revised Permit to Cut dated 20 May 2019 with expiration of 31 May 2022; Timber Appraisal Report; and Cutting Block Report.</p>
X015965	<p>Hardwood shelterwood harvest, favoring oak. 85 acre total sale. Scattered individual trees maintained as reserves. Natural origin red pine was favored for retention legacy trees in order to provide diversity. Disc trenching done in November 2020 in order to improve regeneration in areas that did not have strong oak regeneration. Recreational ATV trail runs through the harvest block, kept free of slash. Aesthetic buffers of red pine along the county roads bordering the sale.</p>
Grayling Marsh WMA	<p>Majority of the WMA is lowland brush/grass, big sedge meadow, smattering of spruce and hardwood. Main purpose of the WMA is to manage for ruffed grouse, bear, deer, waterfowl, also provide public recreation for hunting and non-motorized use. Still a remnant sharp-tailed grouse population in the WMA (more of a prairie species that is uncommon in this part of the state).</p> <p>Reviewed prescribed fire conducted in spring 2019, objective to reduce shade tolerant tree species, reduce duff and fuels, and facilitate red oak and conifer regeneration.</p>
X016296	<p>Aspen clearcut sale (32.4 acres) with mixed hardwoods, reserved red oak, tamarack and ash less than 8-inch dbh. Wanted to maintain smaller ash in order to maintain hydrology on wetter areas of the sale. Harvested using conventional equipment; no visible issues or soil damage associated with the harvest. Prescription was a diameter level cut rather than individual marking. Neighboring landowner is Mille Lacs Ojibwe, discussed the DNR's notification process.</p>
X016687	<p>Oak Shelterwood Harvest (Active). Intermediate Auction Sale sold to Rice River Logging Inc. SFI and FSC Claim and CoC # stated in Permit. Noted that during search of Natural Heritage database that bats habitat was identified to the east of the tract. Plan for leaving snags will meet any habitat needs. Trees marked in orange are leave trees. Cavity trees, den trees, and snags maintained for wildlife. Large tops lopped where felled to protect advanced regeneration. Slash scattered for stabilization and addition of nutrients to site. No damage to residual stand observed. Minimal skinning observed. Patches of White Pine and oak regeneration observed being protected. Noted that there is a good acorn crop. Goal is to reduce BA from 100-120 to 70-80. Landing clean. Access is State Forest Road. Road is being well maintained. Good access to sale area. Minor rutting observed at deck. No water quality or</p>

	soil issue. MN DNR has a Rutting Policy. Discussed metric for guideline and implementation during operations. Skid trails are well maintained with no issues. Good soil scarification on skid trails. Observed vernal pool buffered. No entrance into area.
B013604	White Spruce Plantation Final Harvest by Clearcut with reserves. Regular Auction Sale sold to UPM-Blandin Paper. SFI and FSC Claim and CoC # stated in Permit. Reserves of oak trees and patches identified with blue paint. Winter logging conditions. Conventional logging equipment used during January-February, 2020. During harvesting, the job did not work some days due to ground conditions. Slash is piled to burn. Will replant with Conifer-Spruce mixture. Oak, Aspen, and Maple regeneration observed. No damage to residual stand observed. Chemical site preparation will be used to control Aspen. Access to sight has been controlled using root wads. Discussed site preparation, seed source, and monitoring of planting and survival. Regeneration release was also discussed.
Oak Shelterwood Case Study, Summer vs Winter	Case study conducted for the regeneration of oak. Similar sites in soil type, pre-harvest overstory and understory conditions, and Native Plant Communities were selected to compare regeneration from Winter harvest to Summer harvest. Variability between sites was season of harvest and degree of soil scarification during harvest. Shelterwood cut was conducted to reduce the BA to 40. The Summer harvested site emulates a fire disturbance, while the Winter harvested site emulates a wind-storm disturbance. Findings are timing of harvest and equipment used are crucial for oak regeneration of site. Published by Great Lakes Silviculture Library.

Wednesday, December 2, 2020: Backus Area

FMU / location / sites visited	Activities / notes
Wildlife Presentation	Overview of Meadowbrook Wildlife Management Area. 5772 acres, largest WMA in the work area. Popular hunting location for deer, grouse, and other species. Mix of aspen to oak/northern hardwoods; Aspen on west, Oak on east; Some legacy agricultural leases that are slowly converting back to prairie restoration or reforestation. Habitat management projects include prairie restoration, brush mowing, other early successional habitat projects for golden wing warbler. Partner with Ruffed Grouse Society on red and bur oak planting in timber harvest areas where oak regen was poor.
B014444	59.9 acre sale divided into 7 different harvest blocks, different blocks include clearcut with reserves and commercial thinnings, both marked, and logger select in red pine areas. Primarily harvesting aspen, pine, spruce, and mixed northern hardwoods.

	<p>Stand 6 bordering on open water wetland, limited harvest in RMZ down to 60 BA. Large pines were retained in the RMZ in order to promote long lived species. 50 ft' buffer to the water's edge was not harvested.</p> <p>Whole permit area was along a public road. Caution logging signs were used on the roads. Tops and slash placement were used to deter ATV use in the harvest area.</p>
X015777	<p>Clearcut with reserves, aspen dominant with limited hardwoods; harvested with dry/frozen ground only; 53.5 acres. Cut Nov-Dec 2018. Designated ATV trail through the unit. Scattered snags, pine, oak throughout the harvest site. One harvest block bordered Anna Lake, 120 ft RMZ was used. Buffer around the lake was extended after discussions with Wildlife division for habitat purpose. Also, the lake is in a High Phosphorus Sensitivity Areas, identified by EcoWaters division as being sensitive because of agricultural activity in the area contributed to water pollution concern. Goal in these areas is to favor longer lived species in the RMZs.</p>
X015979	<p>Clearcut with reserves; 52.2 acre sale. Primarily harvesting oak, aspen, birch, maple ash; extensive reserve and no harvest area due to RMZ or areas too steep to operate. 120 ft no harvest RMZ was used. Also, visual buffer put in place along State Highway 87, a high traffic road bordering the sale. Main skid trail access was blocked after the sale was complete in order to reduce ATV use. Harvest equipment was a wheeled buncher and wheeled skidder, and slasher on the landing.</p>
X015973	<p>Aspen/birch harvest with minor red oak/ash, prescription is clearcut with reserves. Reserves composed of pockets, as well as individual red oak reserved throughout the harvest area; 25 acre sale. Wetland complexes in the harvest unit were excluded, verified paint lines around these areas. Goal is to regenerate the site back to original species, primarily aspen.</p>
B013777	<p>Regeneration harvest, Clearcut with reserves. 27 acres total. Eagle nest present as shown on the harvesting map, outside of the cut block. 660 ft buffer placed around eagle nest, and a reserve area was placed where the buffer overlapped with the cut block. Thinning would be permitted in the outer buffer of the nest, but it was kept as a reserve in this case. Reserve area excluded with blue paint.</p> <p>2 cutting areas, one northern hardwood, one aspen. Harvested on frozen ground only, in winter 2018.</p>
B014474	<p>Clearcut with reserves; 56 acre total; harvested March 2020, seasonal restrictions to avoid Blanding's turtle, stand was located within one mile of a turtle observation; 120 ft RMZ buffer around pond. Primary harvest species was Norway pine, also aspen, balsam fir and other minor species.</p>

	Jack pine was favored to retain on the site, as an under-represented pine species on the landscape
X015508	<p>Regeneration harvest, 16 acres, clearcut with reserves; mature Norway pine harvested with minor hardwoods (aspen, red oak, mixed hardwoods) harvested June 2017;</p> <p>White pine was retained across the site to provide seed source and structure; site was planted after regeneration check indicated the need for additional regeneration to occupy the site.</p> <p>50 ft RMZ around wetland, A pre-existing truck road was used for the harvest, berms placed at the end of the sale in order to prevent unauthorized ATV access. Designated ATV trails exist nearby.</p>
B013915	<p>Commercial Thinning, harvest primarily aspen and maple. 30.6 acres. Oak stand retained and thinned down to 80 basal ft, maintaining a closed canopy. Commercial thin was chosen in order to provide cover for northern red shouldered hawk and prevent competition from other hawk species.</p> <p>RMZ placed adjacent to wetland, no harvest within the RMZ; Slash was spread on hillside in order to control runoff</p> <p>Harvested Dec 2018, using a full tree skid in order to encourage acorn establishment. Stand is being set up for a later overstory removal harvest.</p>
X015510	<p>Clearcut with reserves, using conventional harvesting. Harvested winter 2020. 76 acres, primarily aspen with some white and mixed hardwoods. Bur oak reserved for mast production. Harvest took place on frozen ground only.</p> <p>Two large reserve islands in the middle of the cut block, slash was scattered throughout the sale.</p> <p>Reviewed flagging along a property boundary, it was originally a natural harvest line due to different age classes, but they flagged it in order to be certain of the property line.</p>
B013780	Clearcut with reserves, mature aspen with minor hardwood species. 18 acres, dry or frozen ground only. Planned for natural regeneration, clumped reserves. Natural boundary line with alder swamp on the south block.
Silviculture Presentation	<p>Discussed two silviculture research projects focused on recruitment of oak. The first was a planting project using scarification and then plant with an organic animal repellent on acorns. Acorns were spread over 18 acres, with the treated half showing significantly higher germination. The second project was mesh sleeves as a form of browse protection on oak saplings.</p> <p>Found to be more effective than paper sleeves.</p>

Wednesday, December 2, 2020: Deer River Area

FMU / location / sites visited	Activities / notes
X015550	Clearcut aerial seeded in 2020. Wetlands and reserve Tamarack islands protected. No entrance. Winter logging. Snowmobile access into state property was posted by signs and on MN DNR website. CTL for harvesting. Communicated with Parks & Trails during harvest. No issues identified.
X016083	Clearcut with reserves (3 stands). Goal is to remove large Ash and reduce BA to 60. Harvesting will create canopy gaps. Individual trees and clusters will be reserved. Ash removal is in avoidance of the Emerald Ash Bore. Winter harvesting only. Frozen ground is specified in Permit. Ground is very wet. CTL job used for harvesting. Aerial seeding will be used for regeneration. Local cones are collected. Mix of seed will be used with aerial seeding. Black Spruce will be primary specie. Shape file will be provided to contractor. No issues observed during review of video or identified during discussion.
B013555	4 stands in sale. #1 Final harvest uneven aged mixed Conifer with advanced regeneration; #2 2 nd thinning to remove 1/3 of volume (BA 140); #3 Clearcut with reserves; #4 1 st thinning of Norway Pine (BA 130). Harvesting by CTL. Debris spread on skid trails. No skinning or rutting observed. Residual stands well protected. No water features in stands. In #2 the 3 rd row is removed. In #4 the 3 rd row and between. Equipment was well matched to stand and soil conditions. No issues identified.
F011904	Aspen clearcut with reserves. Removal of Ash greater than 8". Others reserved along with 2 Aspen/Acre marked. Reserve area designated with blue paint. Snags and wildlife trees retained. Goal is to add diversity to stand. Winter harvesting using CTL. Well stocked with regeneration. Observed regeneration is well protected during harvesting. No issue with skid trail. Well stabilized. Harvesting was also occurring on lands of the adjoining landowner. The logger requested to purchase the adjacent State timber informally. It is land locked with private access. Good job of marking property line and keeping timber separate. No issues identified or discussed with ownership or mixing of timber. The private timber was cut before the state timber.
B014420	207 acre Aspen Clearcut with reserves/8 acre Northern Hardwood Thinning (Aspen, Birch, low quality hardwood) (Active). Goal is to create diversity and promote Conifers in the stand. Currently trucking. Site can be logged dry or frozen. Began during September. Conventional logging used. Observed spreading of debris to stabilize skid trails. No damage observed to reserves. Deck is clean. Debris scattered and tops lopped. There are several seeps on the tract. Mats are used for crossing. These will be

	removed, and the area mitigated. Whole tree logging was used to scarify the site for regeneration. Aerial seeding will be used for regeneration.
F011960	Two stands: #1 - Select thinning of Red Pine, and #2 – clearcut with no reserves of Black Spruce. Winter logging only. CTL used for harvesting. Debris spread to stabilize skid trails. Eagles nest has been identified in the area. Harvesting guidelines are established for operating in area with seasonal restriction. Witnessed on sale map and reviewed during interview. Permit was added to adjacent Permit at the loggers request due to accessibility and economics of harvesting in conjunction with adjoining Permit purchased by logger. Area will have aerial seeding with Black Spruce in conjunction with adjoining tract.
X016282	28 acre oak release. Row thinning with debris scattered of stability of soil. Goal is to reduce BA from 180 to 120. Oak retained for wildlife. Harvesting using CTL. Logger moved from sale due to poor market. Adjacent landowner has private easement on access to tract. Road maintenance is critical issue on this tract due to adjacent landowner. Deck was placed on each side of road to maintain road. On-going communication with landowner was discussed. Good relationship has been maintained. Road has been maintained well during sale. No issues identified.
X016284	Clearcut with reserves. Stand is mixed Aspen-Conifer. Reserve will be Conifer. Prescription will create diversity on tract. Wildlife reserves for uplands. Eagle was identified on adjoining USFS land after this sale was set-up. Sale was removed from annual plan, buffer established, and area remarked. Sale repackaged and sold next year. Harvesting restricted with seasonal requirements for Eagles. Observed retention of upland islands. No issues identified.
B013638	21 acre 1 st Thinning (Active). Row thinning of Red Pine to reduce BA from 120 to 90. Retain oak and Birch. Harvesting mimics natural patterns of land transition. Harvested using CTL. No rutting observed. Deck is well established and clean. No skinning observed. Good tree selection. Regeneration has been protected. No damage to residual trees. Road is shaped and crowned. Buffer of 50' along wetlands. No entrance. Shoreland development has no impact on sale. Observed sign for Shoreland & Lake of Biodiversity. GIS has layer of scenic and visual concerns for sale. No issues identified.
F011733	Road betterment. Project to daylight Blueberry Forestry Road. Road is maintained by county and is major access to MN DNR property. Harvesting was 30' on each side of road. Goal was to increase air and sunlight on roadbed for drying when conditions are wet – improve public image, and forestry issue. County will mow 4' on each side of road in the future. No skinning of residual stand. No felling into residual stand. Sides clean. No water

	features. Debris is slash, lop, and scatter. Debris is less than 3' of ground. No skidding or deck on road surface. No issues identified.
Silviculture Presentation	<p>Herbicide Use Project</p> <p>Site was planted to red and white pine. Herbicide was used to release the pine from raspberry competition. Contract includes application prescription and conditions of application. Shapefile provides area of application. Buffer is removed from Shapefile. Shapefile is for area of application. Chemical application is turn-key. Chemicals are ordered and handled by contractor – Future Forest Inc. Monitor during handling, mixing, and application. Checklist of chemical use is completed during monitoring. Application Report and application map is provided when Invoiced. Applicator must be licensed applicator. Each year, 1-2 projects are conducted. Additional chemical work is contracted to control invasive species and for roadsides. No issues observed in process or application.</p> <p>Prescribed Fire</p> <p>Prescription to improve Conifer stands. Used in Shelterwood harvests during Spring, 2019. Goal is to mimic natural disturbance practice for natural regeneration. Witnessed and discussed guidelines for use of prescribed burning, Burn Plan, implementation of burn, and monitoring of burn results. Prescribed burns require multi-agency cooperation. No issues identified. No issues have occurred during burns.</p>
Wildlife Presentation	<p>Mud Goose WMP</p> <p>Management includes the following projects:</p> <ul style="list-style-type: none"> • Interagency Prescribed Burning Partnership – Wet Meadow Prescribed Burn • Woodcock Habitat Enhancement Project – Strip brush mowing • Deer Yards – Brush mowing • Public use of area (ATVs not allowed) • Production of wild rice – Tribes, public, waterfowl • Timber harvesting is used as a tool to improve wildlife habitat • Camping areas are available • Waterfowl hunting is provided

Thursday, December 3, 2020

FMU / location / sites visited	Activities / notes
Virtual Meeting	Closing Meeting Preparation: Auditor(s) consolidate notes, deliberate, and confirm evaluation findings.
Virtual Meeting	Closing Meeting: Review preliminary findings (potential non-conformities and observations) and discuss next steps.

2.2 Evaluation of Management Systems

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME's conformance to FSC standards and policies. Evaluation methods include reviewing documents and records, interviewing FME personnel and contractors, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observing implementation of management plans and policies in the field, and collecting and analyzing stakeholder input. When there is more than one team member, each member may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, interviews, stakeholder comments, and reviewed documents and records. Where consensus among team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

3. Changes in Management Practices

- ☒ There were no significant changes in the management and/or harvesting methods that affect the FME's conformance to the FSC standards and policies.
- ☐ Significant changes occurred since the last evaluation that may affect the FME's conformance to FSC standards and policies (*describe*):

4. Results of Evaluation

4.1 Definitions of Major CARs, Minor CARs and Observations

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

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

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

4.2 History of Findings for Certificate Period

FM Principle	Cert/Re-cert Evaluation	1 st Annual Evaluation	2 nd Annual Evaluation	3 rd Annual Evaluation	4 th Annual Evaluation	5 th Annual Evaluation
No findings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
P1			OBS 1.4.a			
P2						
P3	OBS 3.2.a					
P4	OBS 4.4.b				OBS 4.4.b, Minor 4.4.c	
P5		OBS 5.1.b		OBS 5.6.c		
P6	Minor 6.1.b; OBS 6.3.a.1; OBS 6.3.d; OBS 6.6.a; Minor 6.7.b			Minor 6.7.a.	OBS, 6.3.a.3	
P7	OBS 7.2.a				OBS 7.4.a	
P8	OBS 8.4.a; OBS 8.4.b					
P9	OBS 9.1.a	OBS 9.1.a; OBS 9.3.a; OBS 9.4.a			Minor 9.4.a	Obs 9.3.a
P10	NA	NA	NA	NA		
COC for FM						
Trademark						
Group	NA	NA	NA	NA		
Other						

4.3 Existing Corrective Action Requests and Observations

Finding Number: FSC 2019.1			
Select one:		<input type="checkbox"/> Major CAR	<input type="checkbox"/> Minor CAR
		<input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):			
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):		
FSC Indicator:	FSC-US 4.4.b		

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

FME may not have adequately sought and considered input into management planning from its Division of Fish and Wildlife (FAW) wildlife managers about timber harvest areas on WMAs. Specifically, the staff felt they were not given sufficient opportunity to evaluate the spatial distribution of stands selected during the sustainable timber harvest modeling. Based on numerous interviews with wildlife field, management, and planning staff, auditors concluded that some wildlife managers believed that they would be afforded more of an opportunity to provide feedback on the spatially based output to ensure that the 10-year harvest allocation would fit their wildlife management objectives. However, near the end of the implementation modeling, the timeline was compressed and only a brief amount of time was allowed for evaluation. As a result, wildlife-administered lands were assigned to a preliminary 10-year stand examination list in a manner that some wildlife managers feel will compromise wildlife habitat objectives (Reference: Internal Wildlife Staff Memo to Commissioner Strommen, July 17, 2019). The audit team concludes that there is an opportunity to improve the manner in which FAW staff input is incorporated into the STHI.

The FME has described other issues that it has detected related to coordination across the different DNR divisions during the 2019 Internal Audit and Management Review in internal OFI 2019.3. **The FME should be prepared to provide an update on how its internal OFI have been addressed at the next audit.**

Corrective Action Request (or Observation): FME should seek and consider input in management planning from people who would likely be affected by management activities.

FME response (including any evidence submitted)

Internal OFI 2019.3:

The department shall revisit the Interdisciplinary Forest Management Coordination Framework and associated Interdisciplinary Forest Management Policies to identify additional opportunities to strengthen mutual dialogue, understanding, and agreement across disciplines. This should include at a minimum:

- Item 1.** Provide guidance to forestry staff to close out Joint Site Visit or Contact requests in the Stand Exam Layer (SEL);
- Item 2.** Improve communication, collaboration, and conflict management skills for staff;
- Item 3.** Revisit the dispute resolution process regarding who originates the dispute and timelines for resolution, including regional and central office roles;
- Item 4.** Continue to ensure that DNR leadership is clearly communicating the basis for departmental decisions and policies and talking directly with field staff about their concerns; and
- Item 5.** Support low-pressure, inter-divisional coordination activities such as Area or Regional trainings, field days, or in-services that allow staff to exchange information in a non-confrontational setting.

The FME has taken the following steps to address this OFI:

A work group (WG) consisting of Division Management Team (DMT) representatives from each of the divisions involved in interdisciplinary forest coordination has been convened to work on this internal Opportunity for Improvement.

- Item 1:** A guidance document is under development to direct staff how the comments, contacts, or JSVs were resolved (or how the input was used) in SEL and communicate the outcome with staff.
- Item 2:** The WG has been meeting regularly to identify how existing department-wide continuous improvement efforts can improve cross-divisional communication,

	<p>collaboration, and conflict management. The workgroup has identified a number of existing training opportunities and forums that can incorporate improved communication, collaboration, and conflict management topics into existing curriculum.</p> <p>Item 3: The WG is developing a project to identify the specific updates and changes that should be made to the dispute resolution process to add clarity for who originates disputes, timelines, and roles.</p> <p>Item 4: The communication improvement efforts that the WG identified in item 2 above is incorporating the need to better communicate the basis of departmental decisions and policies and talking directly with field staff about their concerns into their work. Additionally, a project is underway to revise the Interdisciplinary Forest Management Policy System (Matrix). This project includes creating procedures for communicating new and revised policies and guidelines with staff. This project will also include developing accompanying cover sheets for each policy and guideline to communicate direction statements, roles and responsibilities, and other pertinent information to staff.</p> <p>Item 5: The WG will document examples of inter-divisional activities that are working well to use as case studies to encourage all areas to incorporate these activities into their work.</p>
SCS review	The actions completed are sufficient to address this observation, although the future audits will continue to monitor implementation of the STHA.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: FSC 2019.2			
Select one:		<input type="checkbox"/> Major CAR	<input checked="" type="checkbox"/> Minor CAR
		<input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):			
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):		
FSC Indicator:	FSC-US 4.4.c		
<p>Non-Conformity (or Background/ Justification in the case of Observations):</p> <p>Indicator 4.4.c requires that people who are subject to direct adverse effects of management operations shall be apprised of relevant activities in advance of the action so that they may express concern. Stakeholders from MN DNR FAW and from USFWS interviewed stated that during the stand selection phase of the STHI, the local US Fish & Wildlife Service refuge managers (USFWS) was not adequately consulted regarding the management of their Land Utilization Project (LUP) lands. LUP lands are leased by the FME from USFWS per the terms of Amendment 8 to Lease Between United States of America and the State of Minnesota (Feb 2009). Clearly, the USFWS represent a distinct category of stakeholder regarding the management of the LUP lands.</p>			

<p>As part of the STHI stand selection phase, questions from the local USFWS refuge manager regarding how the 10 year stand exam list would meet LUP lease terms and management plan objectives were directed to the DNR regional FAW manager. The USFWS staff person consulted as a part of this audit indicated that they wished that MN DNR had considered the terms of their LUP lease and the Beltrami Island management plan to guide the STHI process affecting LUP lands. Instead, the USFWS staff person found them self in a reactive mode having to review a 10 year proposed harvest list to determine how those harvests meet their wildlife objectives.</p>	
<p>Corrective Action Request (or Observation): People who are subject to direct adverse effects of management operations shall be apprised of relevant activities in advance of the action so that they may express concern.</p>	
<p>FME response (including any evidence submitted)</p>	<p>Historically, communications between the DNR area wildlife managers and the Agassiz National Wildlife Refuge manager regarding management of LUP lands have been informal and on an as-needed basis. Several years ago, the need for more regular communication was recognized and plans were made to begin meeting annually. However, the plans were never formalized, and the annual meetings did not occur.</p> <p>DNR did not consult with USFWS during the modeling stages of the Sustainable Timber Harvest Implementation (STHI). Instead, WMA lands, including LUP lands, which are managed for wildlife benefits, were assigned longer stand rotations and higher reserves. Area wildlife staff were asked to review and work with area forestry staff to develop the STHI 10-year stand list when it was created after modeling was finished. USFWS inquired about the STHI 10-year stand selections on LUP lands and were concerned about stands selected by the model not specifically being selected based on a wildlife need, or purpose.</p> <p>DNR is committed to improving the process by working with the USFWS to develop a process to consult and inform each other of proposed habitat management on LUP lands in a manner that is proactive rather than reactive. In addition, DNR is committed to ensuring that all habitat management occurring on LUP lands is for the direct benefit of wildlife.</p> <p>To this end, DNR initiated a series of meetings with the USFWS to discuss the preferred process for consultation regarding future habitat management on LUP lands. The USFWS has indicated this is a satisfactory approach for resolving the identified issue. The first meeting was held on August 27, 2020 with Area, Region, and Central Office Fish and Wildlife division staff and USFWS staff, including Tom Kerr (St. Paul), Jim Graham (Agassiz NWR), and Bruce Henry (Missouri). Discussion was beneficial to frame the concerns of each agency and work toward the USFWS developing a pilot proposal for review of timber sales on LUP lands with DNR. As of 11/1/20, the USF&WS have prepared a pilot proposal to the DNR and the R1 Regional Managers from Wildlife and Forestry are collaborating on a response.</p>
<p>SCS review</p>	<p>This non-conformance is closed based on the evidence reviewed and interviews conducted during the evaluation. Timber harvesting on the LUP lands has been put on hold, and the DNR is engaging with USFWS to determine appropriate sites for future harvests. The situation will be monitored during future audits.</p>
<p>Status of CAR:</p>	<p><input checked="" type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input type="checkbox"/> Other decision (refer to description above)</p>

Finding Number: FSC 2019.3	
Select one:	<input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US 6.3.a.3
Non-Conformity (or Background/ Justification in the case of Observations): Per Indicator 6.3.a.3 FME is expected to maintain the area, structure, composition, and processes of all Type 1 and Type 2 old growth . Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values. 6.3.a.3- At the time of the audit DNR was working on its lowland conifer old growth (LCOG) review and designation. This document was not ready to be reviewed by the audit team, however, some FME staff suggested that some candidate stands potentially qualifying as Type 1 and Type 2 OG are at risk of being released to the management pool. The audit team suggests DNR should consider FSC definitions for Type 1 and Type 2 old growth forests before finalizing LCOG policies.	
Corrective Action Request (or Observation): FME should ensure that Type 1 and Type 2 Old Growth is protected from harvest on public lands.	
FME response (including any evidence submitted)	<p>DNR decided to evaluate FSC definitions for Type 1 and Type 2 old growth forests, and to ensure alignment before finalizing LCOG policies. DNR created a new interdisciplinary project team in fall 2019 to address FSC standards related to Type 1 and Type 2 old growth before finalizing LCOG designations and policies. The team's task was to propose a definition for Type 1 and Type 2 old growth to apply to lowland conifer forests that crosswalks to the FSC requirements. This team was comprised of foresters, wildlife biologists, forest policy and planning experts, ecologists, school trust land administrator, certification consultant, and DNR leadership.</p> <p>The project team analyzed criteria related to old growth features and values found in lowland conifer forest types, and considered the requirements of the FSC standard. The team consulted internal and external subject matter experts about what criteria can be used to locate lowland conifer forest that displays old growth characteristics. External experts included researchers from the University of Minnesota and the U.S. Forest Service. The team explored what data options exist for DNR to locate old growth features in lowland conifer forests.</p> <p>The team created a draft FSC LCOG definition for leadership consideration, analyzed the impact to DNR management, and worked to propose operational procedures for implementation. The project team's work with leadership is not yet complete and is ongoing. Staff continue to work on identifying and clarifying management policies for FSC LCOG. For example, finding resolution between meeting FSC certification requirements for</p>

	old growth and meeting statutory requirements to provide access to underlying mineral resources, particularly on school trust lands. DNR may choose to protect older examples of lowland conifer forest above and beyond those that meets the FSC definition of Type 1 and Type 2 old growth.
SCS review	This observation is closed, although the outcomes of the process will be monitored during future audits. There is currently a moratorium on harvesting on any potential lowland conifer old growth stands until a definition is finalized, so any current risk associated with this finding is negligible.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: FSC 2019.4			
Select one:	<input type="checkbox"/> Major CAR	<input type="checkbox"/> Minor CAR	<input checked="" type="checkbox"/> Observation
FMU CAR/OBS issued to (when more than one FMU):			
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):		
FSC Indicator:	FSC-US 7.4.a		
<p>Non-Conformity (or Background/ Justification in the case of Observations):</p> <p>While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee as confirmed on the FME's website.</p> <p>The FMP's central webpage includes an overarching document, Description of the Components of DNR's Management Plan, which describes the main components of the FMP. Several of the links contained therein no longer function (e.g., http://www.frc.state.mn.us/index.html; http://files.dnr.state.mn.us/assistance/backyard/treecare/forest_health/invasiveGuidelines.pdf; http://mn.gov/frc/landscape-level-management-program.html; http://www.dnr.state.mn.us/forestry/subsection/index.html; http://www.dnr.state.mn.us/forestry/subsection/blufflands/highdiversity.html; etc.)</p> <p>An updated version of the <i>Description of the Components of DNR's Management Plan</i> with fully functional links was provided to the audit team, but was not available on the website until the week after the audit. This is an integral component of the FMP Public Summary.</p>			
<p>Corrective Action Request (or Observation): The FME should include the updated version <i>Description of the Components of DNR's Management Plan</i> on the website before the next recertification audit to ensure greater transparency of the FMP.</p>			
FME response (including any evidence submitted)	An updated version of the <i>Description of the Components of DNR's Management Plan</i> with fully functional links was provided to the audit team, but was not available on the website until the week after the audit. This is an integral component of the FMP Public Summary.		

SCS review	The audit team verified that an up to date version of this planning document was available on the DNR website: https://www.dnr.state.mn.us/forestry/certification/managementplan.html
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: FSC 2019.5	
Select one:	<input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US 9.4.a
Non-Conformity (or Background/ Justification in the case of Observations): Interviews with FME staff and review of documentation revealed that FME's occasional monitoring of HCVs does not fully conform with 9.4.a. There is a lack of systematic monitoring of HCV management guideline effectiveness. The audit team understands that there are aspects of HCV monitoring that are difficult to accomplish in a robust manner, however, FME approved its current list of HCVs in 2011 and thus has had some time to implement a monitoring system. Note that the 9.4.a does not specify the types of monitoring that are required, i.e., frequent field visits are not specifically required for monitoring, particularly for passively managed HCVs.	
Corrective Action Request (or Observation): FME shall monitor, or participate in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program shall be designed and implemented consistent with the requirements of Principle 8.	
FME response (including any evidence submitted)	In 2017, Teams were chartered to begin the prioritization and development of management guidelines for selected HCV's. To date, guidelines have been developed for 7 HCVs that are commonly encountered in management of our certified lands. These HCV's include rare native plant communities, rare species, and ecosystems of significance. In 2020, a Project Team was formed to modifying these HCV guidelines to incorporate a monitoring approach that will; <ul style="list-style-type: none"> • Focus on data that are of sufficient detail to evaluate current conditions so they can be compared at future intervals, • The effects of management and progress towards desired future conditions and management objectives, • Describe the monitoring procedures and their frequency, • Recognize the constraints of existing department staff workload and in-place systems.

	The team completed their work and submitted their recommendations to leadership for implementation. Given the complexities of Covid 19, leadership is working through the impacts of this new work on its impact on existing staff workload. Trial implementation is expected in 2021, to further judge the impact on workload and budgets.
SCS review	This non-conformance is extended until the 2021 audit based on the exceptional circumstances of the Covid 19 pandemic. FSC protocols allow for a one time extension of non-conformance deadlines based on exceptional circumstances. Additionally, mitigating the finding here is that monitoring of HCVs did still occur since the last audit, albeit in an informal matter.
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> <i>Other decision (refer to description above)</i>

4.4 New Corrective Action Requests and Observations

Finding Number: 2020.1			
Select one:	<input type="checkbox"/> Major CAR	<input type="checkbox"/> Minor CAR	<input checked="" type="checkbox"/> Observation
FMU CAR/OBS issued to (when more than one FMU):			
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):		
FSC Indicator:	FSC-US 9.3.a		
Non-Conformity (or Background/ Justification in the case of Observations): In conversations during the audit it was identified that there may be a difference in management approaches applied to High Conservation Values (HCV) depending on whether or not they are found within the DNR's designated High Conservation Value Forests. In past audits the audit team had understood that that the features that make up high conservation values have received equivalent protection by the DNR whether or not they are found within a designated HCVF. Additionally, impending changes to the FSC-US National Standard may result in changes to the DNR's HCV identification and management system. Some features currently classified as HCV may not meet the definition in the new standard, and conversely some areas not currently identified as High Conservation Value Forests may meet the new definitions of High Conservation Value Areas.			
Corrective Action Request (or Observation): With the impending revision to the FSC-US National Standard, the requirement for identification, management, and monitoring of High Conservation Values will be placed on HCVs regardless of where they occur in the management unit. In addition, the High Conservation Value Framework in the draft standard has updated guidance for the identification of HCVs that may affect the DNRs current designation of these values. This could result in fewer features being identified as HCV In preparation for these changes in the new standard, the DNR should, using the High Conservation Value Framework, review and reconsider directly how their High Conservation Values are defined in accordance with the new HCV Framework, and how these HCVs will be maintained or enhanced and monitored, regardless of whether they occur in the currently designated HCVFs or not.			

This finding is graded as an observation because it primarily pertains to a requirement of the new standard not yet in effect. Also, no direct harm to HCVs was observed during the audit, and so a non-conformance was not currently warranted.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

5. Stakeholder Comments

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

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

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used.

5.1 Stakeholder Groups Consulted

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

5.2 Summary of Stakeholder Comments and Evaluation Team Responses

The table below summarizes the major comments received from stakeholders and the assessment team's response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

☐ FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual evaluation.

Stakeholder Comment (paraphrased)	SCS Response
MN DNR isn't harvesting anywhere near gross growth; 0.3 cords/acre/year is harvested vs. growth of 0.6 cords/acre/year. This is too little. For example, the agency harvests much less than the Wisconsin DNR.	MN DNR engaged in an in-depth analysis to arrive at its current sustainable target of 870,000 cords per year, including a balancing of environmental and economic factors. The target was raised from its previous level, but not up to the amount in which harvesting would equal growth. The FSC standard does not have a minimum harvest level or require that harvest levels approach growth levels. No finding is warranted.
It was good that the MN DNR used outside consultants when establishing their sustained yield harvest levels. I commend the agency for using a third party and for the initial part of the process that brought together stakeholders through an advisory council. However, I'm disappointed that in the end they chose a low harvest level.	Comment noted as evidence of conformance.
A purported lack of markets is being used as a scapegoat for low harvest rates. The reality is that there are markets, but sales are not being set up near those existing markets. Timber companies need the ability to bid on profitable harvests. A lack of management is contributing to forest health issues. Blowdown and salvage are symptoms of a forest health problem. Shrinking supply near mills force timber companies to seek supply farther away, which ultimately kill mills. We need to think about maintaining healthy forests close to mills.	The DNR attempts to offer a variety of sales in order to balance the profitability of sales with the forest management objectives of the site. At this point there is not enough evidence viewed during this audit to warrant a finding but this issue will be looked at more closely in future evaluations.
There seems to be resistance in MN DNR to embracing active forest management as tool to benefit wildlife. The Wisconsin DNR cuts its state lands at a higher level, which benefits wildlife.	Multiple examples were reviewed during the audit in which active forest management was used as a tool to benefit wildlife, particularly on DNR's Wildlife Management Areas. Harvest levels need to be balanced between multiple objectives, as determined by the Sustainable Timber Harvest Analysis. No finding is warranted.

It's very telling and unfortunate that FSC does not have more focus on economic needs. The forest industry is seen as secondary in the standard.	The comment is noted, but it should be directed at FSC as part of its standard revision process. It is not directly related to MN DNR's conformance to the standard.
Although Land Utilization Project (LUP) lands are managed by the MN DNR, they remain under the ownership of the federal government. Any harvests on LUP lands must seek the approval of the US Fish and Wildlife Service (USFWS). For these reasons, the USFWS should have been involved in the calculation of sustainable timber harvest levels that include LUP lands. Additionally, the management of LUP lands must be aligned with the goals of the Beltrami Island Land Utilization Project Comprehensive Conservation Management Plan (CCMP).	This topic was originally identified during the 2019 audit and CAR 2019.2 was issued. At the time of the 2020 audit, harvesting by the DNR on the LUP lands had been put on hold, and the DNR was engaged in active dialogue with USFWS over the planning information needed before harvests would be approved. See discussion of CAR 2019.2 for more detail.

6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual evaluation team recommends that the certificate be sustained, subject to subsequent annual evaluations and the FME's response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments:	

7. Annual Data Update

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

Name and Contact Information

Organization name	Minnesota Department of Natural Resources		
Contact person	Tim Beyer, Forest Certification Program Consultant		
Address	500 Lafayette Road St Paul, MN 55155	Telephone	(651) 259-5256
		Fax	
		e-mail	Tim.Beyer@state.mn.us
		Website	Minnesota DNR Website

FSC Sales Information

FSC salesperson	Same as above		
Address		Telephone	
		Fax	
		e-mail	
		Website	

Scope of Certificate

Certificate type	<input checked="" type="checkbox"/> Single FMU		<input type="checkbox"/> Multiple FMU	
	<input type="checkbox"/> Group			
SLIMF if applicable	<input type="checkbox"/> Small SLIMF certificate		<input type="checkbox"/> Low intensity SLIMF certificate	
	<input type="checkbox"/> Group SLIMF certificate			
# Group Members (if applicable)				
Number of FMU's in scope of certificate	1			
Geographic location of non-SLIMF FMU(s)	Latitude: 93 degrees 05 minutes W Longitude: 44 degrees 57 minutes N			
Forest zone	<input type="checkbox"/> Boreal		<input checked="" type="checkbox"/> Temperate	
	<input type="checkbox"/> Subtropical		<input type="checkbox"/> Tropical	
Total forest area in scope of certificate which is: Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac				
privately managed				
state managed		4,997,383		
community managed				
Number of FMUs in scope that are:				
less than 100 ha in area	0	100 - 1000 ha in area	0	
1000 - 10 000 ha in area	0	more than 10 000 ha in area	1	
Total forest area in scope of certificate which is included in FMUs that: Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac				
are less than 100 ha in area		0		
are between 100 ha and 1000 ha in area		0		
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs		0		
Division of FMUs into manageable units:				
Minnesota DNR develops forest resource management plans using the section level of its ecological classification system rather than administrative areas. Seven Section Forest Resource Management Plans (SFRMP) cover DNR-administered forest lands. Forest management is managed across three Administrative Regions and 15 Forestry Areas.				

Non-SLIMF FMUs (Group or Multiple FMU Certificates)

Name	Contact information	Latitude/ longitude of Non-SLIMF FMUs	

Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
male workers: 817	female workers: 193	
Number of accidents in forest work since previous evaluation:35	Serious: 3	Fatal: 0

Pesticide and Other Chemical Use

Product	Active Ingredient	Amount	Unit new	Acres	Purpose
Accord XRT	glyphosate	26.6	Gal	70.8	Invasives
Accord XRT	glyphosate	13.2	Gal	35.1	Release
Accord XRT	glyphosate	176.7	Gal	389.6	Site Prep
Activator 90	Surfactant	20.2	Gal	164.6	Invasives
Choice	Surfactant	526.7	Oz	164.6	Invasives
Choice	Surfactant	2031.0	Oz	637.0	Release
Choice	Surfactant	490.0	Oz	153.0	Site Prep
Element 4	Triclopyr	50.6	Gal	632.8	Invasives
Escort	Metsulfuron Methyl	135.3	Oz	129.3	Invasives
Garlon 4	Triclopyr	16.0	Gal	4.8	Invasives
Garlon 4	Triclopyr	0.2	Gal	5.0	Site Prep
Garlon 4 Ultra	Triclopyr	20.1	Gal	244.4	Invasives
Garlon 4 Ultra	Triclopyr	33.5	Gal	202.7	Release
Garlon 4 Ultra	Triclopyr	9.5	Gal	75.0	Site Prep
Garlon XRT	Triclopyr	16.0	Gal	64.0	Release
Garlon XRT	Triclopyr	135.4	Gal	413.2	Site Prep
Milestone	Triisopropanolammonium	7.7	Gal	166.6	Invasives
Opensight	Metsulfuron methyl	1.2	Gal	28.1	Invasives
Oust XP	Sulfometuron methyl	141.5	Oz	107.0	Release
Oust XP	Sulfometuron methyl	344.3	Oz	264.4	Site Prep
Pathfinder	Triclopyr	0.9	Gal	5.6	Invasives
Penetron	Surfactant	50.1	Gal	636.0	Release
Penetron	Surfactant	4.5	Gal	57.0	Site Prep
Relegate	Triclopyr	17.8	Gal	153.0	Invasives
Rodeo	Glyphosate	1.6	Gal	11.3	Invasives
Rodeo	Glyphosate	250.5	Gal	725.0	Release
Rodeo	Glyphosate	72.2	Gal	189.9	Site Prep
Roundup	Glyphosate	0.3	Gal	0.7	Invasives
Transline	Clopyralid	0.7	Gal	32.0	Invasive
Vastlan	Triclopyr	1.3	Gal	8.3	Invasives
Velpar	Hexazinone	13.3	Lb	5.6	Release

Production Forests

Timber Forest Products	
Total area of production forest (i.e. forest from which timber may be harvested)	2,800,000 acres
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	1,075,000 acres
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	1,725,000 acres

Silvicultural system(s) and area under type of management	
Even-aged management	2,412,600 acres
Clearcut	2,051,500 acres
Shelterwood	103,700 acres
Other:	257,400 acres
Uneven-aged management	252,300 acres
Individual tree selection	5,100 acres
Group selection	
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	

Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	2,209,183 acres
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	FY 2020 – 1933 cord equivalents

Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name (Common/ Trade Name)</i>
<p>Conifers</p> <ul style="list-style-type: none"> Pinaceae (pine family) <ul style="list-style-type: none"> Eastern White Pine <i>Pinus strobus</i> Red Pine or Norway Pine <i>Pinus resinosa</i> Jack Pine <i>Pinus banksiana</i> Black Spruce <i>Picea mariana</i> White Spruce <i>Picea glauca</i> Tamarack Larch <i>Larix laricina</i> Balsam Fir <i>Abies balsamea</i> Eastern Hemlock <i>Tsuga canadensis</i> Cupressaceae (cypress family) <ul style="list-style-type: none"> Eastern Arborvitae <i>Thuja occidentalis</i> Eastern Juniper <i>Juniperus virginiana</i>

Hardwoods

- Salicaceae (willow family)
 - [Quaking Aspen](#) *Populus tremuloides*
 - [Big-tooth Aspen](#) *Populus grandidentata*
 - [Ontario Balsam Poplar](#) *Populus balsamifera*
 - [Eastern Cottonwood](#) *Populus deltoides*
 - [Black Willow](#) *Salix nigra*
 - [Peachleaf Willow](#) *Salix amygdaloides*
- Juglandaceae (walnut family)
 - [Black Walnut](#) *Juglans nigra*
 - [Butternut](#) *Juglans cinerea*
 - [Shagbark Hickory](#) *Carya ovata*
 - [Bitternut Hickory](#) *Carya cordiformis*
- Betulaceae (birch family)
 - [Paper Birch](#) *Betula papyrifera*
 - [Yellow Birch](#) *Betula alleghaniensis*
 - [River Birch](#) *Betula nigra*
 - [American Hornbeam](#) *Carpinus caroliniana*
 - [Ironwood](#) *Ostrya virginiana*
- Fagaceae (beech family)
 - [White oak](#) *Quercus alba*
 - [Bur oak](#) *Quercus macrocarpa*
 - [Swamp white oak](#) *Quercus bicolor*
 - [Chestnut oak](#) *Quercus prinus*
 - [Chinkapin oak](#) *Quercus muhlenbergii*
 - [Cottonwood](#) " *Populus Deltoides* var. *occidentalis*'
 - [Northern red oak](#) *Quercus rubra*
 - [Black oak](#) *Quercus velutina*
 - [Northern pin oak](#) *Quercus ellipsoidalis*
- Ulmaceae (elm family)
 - [Hackberry](#) *Celtis occidentalis*
 - [American Elm](#) *Ulmus americana*
 - [Slippery Elm](#) *Ulmus rubra*
 - [Rock Elm](#) *Ulmus thomasii*
- Moraceae (mulberry family)
 - [Red Mulberry](#) *Morus rubra*
- Rosaceae (rose family)
 - [American mountain ash](#) *Sorbus americana*
 - [Black Cherry](#) *Prunus serotina*
 - [Pin cherry](#) *Prunus pensylvanica*
- Fabaceae (pea family)
 - [Honey locust](#) *Gleditsia triacanthos*
 - [Kentucky coffeetree](#) *Gymnocladus dioica*
- Sapindaceae (soapberry family)
 - [Sugar Maple](#) *Acer saccharum*
 - [Black Maple](#) *Acer nigrum*
 - [Silver Maple](#) *Acer saccharinum*
 - [Red Maple](#) *Acer rubrum*

- [Boxelder](#) *Acer negundo*
- Malvaceae (mallow family)
 - [Basswood](#) *Tilia americana*
- Oleaceae (olive family)
 - [White Ash](#) *Fraxinus americana*
 - [Black Ash](#) *Fraxinus nigra*
 - [Green Ash](#) (also "Red Ash") *Fraxinus pennsylvanica*

Credit: http://en.wikipedia.org/wiki/List_of_Minnesota_trees (Accessed Oct 5, 2015)

FSC Product Classification

Timber products

Product Level 1	Product Level 2	Species
W1 Rough Wood	W1.1 Roundwood	See "Species in Scope Above"
W1 Rough Wood	W1.2 Fuel Wood	See "Species in Scope Above"
W3 Wood in Chips or particles.	W3.1	See "Species in Scope Above"

Non-Timber Forest Products

Product Level 1	Product Level 2	Product Level 3 and Species

Conservation and High Conservation Value Areas

Conservation Area	
Total amount of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).*	2,197,383 acres

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

High Conservation Value Forest / Areas

Code	HCV Type	Description & Location	Area
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		262,626 acres for HCV's 1-3
HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally		

	occurring species exist in natural patterns of distribution and abundance.		
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.		
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		1310 acres
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		

Total area of forest classified as 'High Conservation Value Forest / Area'	263,936 acres
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Areas Outside of the Scope of Certification (Partial Certification and Excision)

<input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.	
<input type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.	
<input checked="" type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.	
Explanation for exclusion of FMUs and/or excision:	State Parks, Scientific and Natural Areas, Agriculture lands, and power and gas line lease areas are excised as they are not managed for timber production.
Control measures to prevent mixing of certified and non-certified product (C8.3):	

Description of FMUs excluded from or forested area excised from the scope of certification:

Name of FMU or Stand	Location (city, state, country)	Size (<input type="checkbox"/> ha or <input type="checkbox"/> ac)

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – List of FMUs Selected for Evaluation

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

Appendix 2 – Staff and Stakeholders Consulted

List of FME Staff Consulted

To protect privacy, only FME staff who have expressly provided written permission are listed. **These records are retained by SCS and subject to FSC or ASI examination.**

-Staff participation on file

List of other Stakeholders Consulted*

To protect privacy, only stakeholders who have expressly provided written permission are listed. **These records are retained by SCS and subject to FSC or ASI examination.**

-Stakeholder information on file

** Note: SCS may maintain additional records of stakeholder consultation activities (e.g., email notifications) in its recordkeeping system. Anonymous stakeholders may have provided comments as a part of stakeholder outreach activities.*

Appendix 3 – Additional Evaluation Techniques Employed

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

Due to the COVID-19 crisis, the audit was conducted per applicable FSC, RW, and/or SFI guidance. The following Information and Communication Technology (ICT) Tools were used to complete the audit, including any issues that were exceptionally difficult to evaluate. Remember that audit evidence typically includes Documentation, Interviews, and Observation. Remote audits tend to emphasize Documentation and Interviews over direct Observation. Certain technologies must be used to substitute for direct Observation. During remote audits, auditors shall utilize information and communication technology (ICT) to evaluate all requirements from the annual audit plan to the extent possible. Audits shall be conducted on the basis of virtual meetings / interviews with relevant people of the certificate holder and stakeholders, relevant documents and records, satellite images (where possible), and other best available information.

Remote audits **must** include all forms of remote auditing tools described below:

- Video meetings / remote site sampling (virtual company tour);
- Interviews with relevant FME personnel and stakeholders;
- Relevant documents and records; and
- Satellite or drone images (where possible), and other best available remote observation information including, for example, georeferenced photos and videos.

If one of these tools is not available, the auditor must justify how the audit can proceed without such tools in this form. Audits in this situation may be postponed at the discretion of the FM director until an on-site audit is possible, if the lack of appropriate ICT tools presents an unacceptable conformance risk.

Describe the ICT tools used and agreed upon with the certificate holder to evaluate the requirements included in the scope of the audit (check all that apply):

Documentation:	<input checked="" type="checkbox"/> Computer (e.g., laptop)	<input checked="" type="checkbox"/> Email	<input checked="" type="checkbox"/> Filesharing service (e.g., Dropbox, SharePoint)	<input type="checkbox"/> Virtual Private Network (VPN)	<input type="checkbox"/> Other (describe):
Interviews:	<input checked="" type="checkbox"/> Phone (e.g., mobile, landline)	<input type="checkbox"/> Peer-to-peer voice, chat, or video application (e.g., Skype, WhatsApp)	<input checked="" type="checkbox"/> Tele- or video-conferencing application (e.g., Zoom, GoToMeeting)	<input type="checkbox"/> Teletypewriter (TTY) or other device for hearing-impaired	<input type="checkbox"/> Other (describe):
Observation:	<input checked="" type="checkbox"/> Satellite/GIS data	<input checked="" type="checkbox"/> Smartphone camera	<input type="checkbox"/> Digital camera	<input checked="" type="checkbox"/> Video/audio recording	<input type="checkbox"/> Other (describe):

General description: Skype for Business teams was used to conduct interviews with staff and share screens for showing records and presentations. Filesharing (e.g., documents, records) was done using the FME's FTP website. Remote inspection was done using video, with DNR staff taking recorded videos of harvest sites using guidance from the audit team.

Appendix 4 – Required Tracking

Pesticide Derogations

- ☒ There are no active pesticide derogations for this FME.

Progressive HCVF Assessments

☒ FME does not use partial or progressive HCVF assessments

Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit

<input type="checkbox"/>	Not applicable; no significant issues identified that may impact the next audit.
Some issues were identified during this audit that the next audit team could consider in the next audit, such as:	
<input type="checkbox"/>	Scope of certificate:
<input type="checkbox"/>	Audit sampling:
<input type="checkbox"/>	Audit time:
<input type="checkbox"/>	Audit season:
<input type="checkbox"/>	Travel time between sites or FMUs:
<input type="checkbox"/>	Audit frequency:
<input type="checkbox"/>	Suggested audit team competency for next audit:
<input type="checkbox"/>	Suggested requirements to include during the next audit:
<input checked="" type="checkbox"/>	Suggested issues investigate during the next audit: Observations related to the following topics were closed during the 2020 audit, but should be reviewed again by future audit teams: Implementation of harvest site selection under the Sustainable Timber Harvest Analysis; Timber Harvest Planning on USFWS LUP lands; Lowland Conifer Old Growth Definition; Economic feasibility of sales being offered
<input type="checkbox"/>	Suggested sites for inspection:
<input type="checkbox"/>	Stakeholders to be consulted:
<input type="checkbox"/>	Other(s) – please describe:

Appendix 5 – Forest Management Standard Conformance Table

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

Requirements Reviewed in Annual Evaluation

Evaluation Year	FSC P&C Reviewed
2015	All – (Re)certification Evaluation
2016	P3; P6; Annually required: 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 8.2, 8.4, 9.1; 9.4
2017	P1; P9; Annually required: 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 8.2, 8.4, 9.1; 9.4
2018	P2; P4; P5; Annually required: 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 8.2, 8.4, 9.1; 9.4
2019	P7 and P8; Annually required: 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 8.2, 8.4, 9.1; 9.4
2020	1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 6.9, 7.4, 8.2, 9.4

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

C= Conformance with Criterion or Indicator

NC= Nonconformance with Criterion or Indicator

NA = Not Applicable

NE = Not Evaluated

Principle #1: Compliance with Laws and FSC Principles - Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.

1.1 Forest management shall respect all national and local laws and administrative requirements.	NE	
1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	NE	
1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	NE	
1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	NE	
1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest Management Unit</i> (FMU).	C	Per interviews with staff, FME has law enforcement and state lands staff that handle access, theft, trespass, and other issues related to this Criterion. <u>State Forest rules</u> are posted on the Internet.

		DNR provides ready access on the Internet to <u>hunting, fishing and other natural resources regulations</u> . DNR sponsors <u>hunter and snowmobile/OHV education</u> .
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	<p>DNR Timber Manual addresses illegal activities via r-trespass, dp19-state-land-trespass, and dp19-state-land-trespass-supplemental-procedures.</p> <p>Interviews with DNR staff and field observations confirmed that OHV clubs are active in trying to keep their membership from riding on unauthorized trails. Observed posting of numerous signs instructing riding to act responsibly. Efforts to block unauthorized access to ATCs were viewed at numerous field sites during the 2020 audit.</p> <p>Per interviews with field staff and observation during site visits, the audit team confirmed that there are FME staff that can issue citations when unauthorized or illegal activities occur. There is also law enforcement available to conduct investigations when necessary.</p>
1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	NE	

Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.

2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.	NE	
2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.	NE	
2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.	C	
2.3.a If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve	C	FME staff reported that there are no new or unresolved disputes over tenure claims and use rights. During virtual

them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.		field visits and review of maps, timber sale and property boundaries were clearly marked.
2.3.b The forest owner or manager documents any significant disputes over tenure and use rights.	C	Stakeholder consultation conducted during the audit revealed no conflicts.

Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.

3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.	NE	
3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	C	
3.2.a During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.	C	FME reported that there are no known locations where management activities have affected resources or tenure rights of indigenous peoples in the last year. Field staff interviewed confirmed that there were no special sites that required additional protections from management activities.
3.2.b Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	Since the last audit, DNR has brought on a dedicated Tribal Liaison. The liaison is an enrolled tribal member, and focuses on government to government level interactions between the DNR and the tribes in the state.
3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	NE	
3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.	NE	

Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.

4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	NE	
4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.	C	
4.2.a The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).	C	FME reported that there have been work related accidents on the FMU in the past year as summarized in the Divisional Injury and Illness Performance Report, July 2020. Significant operational changes were made during 2020 in order to respond to the Covid 19 Pandemic. The DNR maintains a webpage on how operations will continue in the wake of the pandemic - COVID-19 Information
4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	C	FME reported that there have not been any changes to its permits or contracts since the last audit. Logging contracts reviewed contain safety requirements. See notes from inspections and interviews in 4.2.a.
4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan.	C	Logging contracts require safety qualifications and training. Interviews with forestry staff confirm that loggers receive annual training via the MELP.
4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).	NE	
4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.	C	
4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on: <ul style="list-style-type: none"> Archeological sites and sites of cultural, historical and community significance (on and off the FMU; 	C	FME reported the follow activities related to social impacts since the last audit: <ul style="list-style-type: none"> Annual Stand Exam List (ASEL): Public review of the DNR FY 2021 ASEL was completed April 29, 2020. Annual Plan Additions (APA): The first public review of the APAs for FY 2021 was completed August 31, 2020. These review opportunities occur every few months as needed.

<ul style="list-style-type: none"> • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. <p>A summary is available to the CB.</p>		<ul style="list-style-type: none"> • Lowland Conifer Old Growth Designation (LCOG): DNR engaged with our tribal partners to gauge social impacts of our proposed designation of lowland conifer old growth from July – September 2019. • Lake States Forest Management Bat Habitat Conservation Plan (HCP): DNR engaged with our tribal partners and numerous other stakeholders to gauge impacts and gather feedback on chapters 4 & 5 of the HCP from March-April 2020 and chapters 6-8 of the HCP from July – August 2020. • Forest Action Plan (FAP): A public review (including a tribal review) process was completed in March – April 2020. The FAP is now complete and is available on our website (awaiting final USFS approval). • Sustainable Timber Harvest: Develop of the DNR 10-year Stand Exam List Report and 10-year stand exam list spatial data: The DNR now has stand exam lists for all forested ecological sections, covering fiscal years 2021 – 2030. These lists represent a statewide 10-year stand exam list—the forest resource management plan specifying which stands the DNR will visit and assess for potential harvest over the next 10 years. The 10-year stand exam list was developed using a model based on the one created for the sustainable timber harvest analysis by Mason, Bruce, & Girard. Annual stand exam lists will be pulled from the 10-year stand exam list each fiscal year and made available for public review and comment. • Following the DNR’s deer management plan, the Division of Fish and Wildlife conducted open houses in multiple locations across the state to discuss and take input from the public on various deer and deer management subjects. Information on the open houses and summaries from past meetings can be found on the DNR website.
<p>4.4.b The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.</p>	C	<p>FME reported a summary of stakeholder comments received since last year’s audit that have required a response:</p> <ul style="list-style-type: none"> • ASEL: We received comments from the Sierra Club, a private consulting company, and Leech Lake Band of Ojibwe. The Division of Forestry responded to their concerns. • APAs: We received a comment from a private individual. The Division of Forestry responded to their concerns. • LCOG: We received a combination of written and verbal comments from tribal representatives. MN DNR

		<p>responded to their concerns and we hope to post a response to tribal and other comments as part of our stakeholder engagement planning for this project.</p> <ul style="list-style-type: none"> • HCP: We received several comments from many stakeholders including tribes, private individuals, forest industry representatives, and more. MN DNR is actively engaged in a response process now with our two partner states (Michigan and Wisconsin). • FAP: We received comments from the University of Minnesota Extension, U.S. Fish & Wildlife Service, U.S. Department of Agricultural Natural Resource Conservation Service, University of Minnesota Forestry Department, Minnesota Forest Industries, Chippewa National Forest, and a private consulting company. The Division of Forestry responded to their concerns. • Sustainable Timber Harvest: Develop of the DNR 10-year Stand Exam List Report and 10-year stand exam list spatial data: Annual stand exam lists will be pulled from the 10-year stand exam list each fiscal year and made available for public review and comment. • The Department has continued to receive comments from multiple stakeholder groups regarding the STHI and its implementation. The USFWS Region 3 Wildlife and Sport Fish Restoration Program has made inquiries relating to forest management and the conditions of federal aid grants, and the USFWS Region 3 Refuges Program has made inquiries relating to forest management on federal lands managed by DNR under a Land Utilization Project lease. Agency leadership and the Division of Fish and Wildlife are responding to those inquiries.
4.4.c People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.	C	All FME documents, including site-level plans, are made available online for comment well before operations begin (refer to 4.4.d.). Interviews with FME field staff confirmed that they contact adjacent land managers and owners are during the planning process to avoid any issues.
4.4.d For public forests , consultation shall include the following components: <ol style="list-style-type: none"> 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 	C	The MN DNR Internet provides links to the following current public input opportunities . Upcoming timber harvest plans are listed and mapped on an “ Annual stand exam lists ” and Forest View web pages. Public comments on preliminary harvests are welcomed. The audit team reviewed the Forest View mapping tool in detail to confirm how it provides stakeholder input opportunities.

<p>2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management;</p> <p>3. An accessible and affordable appeals process to planning decisions is available.</p> <p>Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p>		<p>Per review of the stand exams lists, these are posted at least 6 months before the close of the year for the next fiscal year and open for a 30-day comment period.</p> <p>Minnesota statutes and administrative rules provide for an appeals process (e.g., Minnesota administrative rules). All management planning documents are available publicly on the FME's website.</p>
<p>4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p>	NE	

Principle #5: Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.

<p>5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.</p>	NE	
<p>5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.</p>	NE	
<p>5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</p>	NE	
<p>5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>	NE	
<p>5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest</p>	NE	

services and resources such as watersheds and fisheries.		
5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.		
<p>5.6.a In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.</p> <p>The sustained yield harvest level calculation for each planning unit is based on:</p> <ul style="list-style-type: none"> • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. <p>The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.</p>	C	<p>DNR engaged in a multi-year Sustainable Timber Harvest Analysis, which identified a sustainable harvest goal of 870,000 cords offered per year, plus an additional 30,000 cords of selected species with high mortality risk.</p> <p>In a letter dated 11/2/2016 Governor Mark Dayton directed DNR to analyze the sustainable harvest level from DNR administered lands to see if the annual harvest level could be raised to 1,000,000 cords from its prior level of 800,000. As part of this direction DNR was to offer 900,000 cords during the sustainable harvest analysis if this amount could be done without jeopardizing sustainable forest management or the ability to offer at least 800,000 cords in future years.</p> <p>DNR announced the results of its Sustainable Timber Harvest Analysis on March 1, 2018, and set a goal of 870,000 cords per year. There is also the possibility of an additional 30,000 per year of ash and tamarack over the next five years, because of increasing insect mortality on these species (from emerald ash borer and eastern larch). The extensive analysis behind the new harvest level can be found on the DNR website: Sustainable timber harvest analysis, decisions, and planning</p> <p>DNR employed an outside contractor to assist in the analysis, although the final decision was taken by the department. The analysis followed techniques standard in the forestry industry, planning software and growth and yield data to analyze a variety of timber production scenarios, from most to least aggressive. The final determination of 870,000 cords did not follow any single modelled scenario but represented a compromise that allowed the DNR to increase its harvest level while still being able to meet its environmental and social management goals. Areas restricted from harvest production, such as designated old growth, were not considered as growing stock contributing the allowable harvest.</p> <ul style="list-style-type: none"> • However, consultation with FAW staff and the USFWS local manager indicates that these staff feel the sustained yield harvest level calculation for each

		planning unit may not fully consider on WMAs and LUPs. See discussions of findings 2019.1 and 2019.2 for more details.
5.6.b Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.	C	See 5.6.a. Established Annual Allowable Harvest: 900k cords offered per year over the 10-year period. FY2020 Harvest: 706k cord equivalents FY2019 Harvest: 821k cord equivalents FY2018 Harvest: 743k cord equivalents
5.6.c Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.	C	Field sites reviewed during the 2020 audit confirmed that individual stands are being managed in a way to achieve desired future conditions and maintain health and quality across the FMU. Numerous examples including harvesting of ash in response to emerald ash borer.
5.6.d For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.	C	Commercial harvest of NTFPs is regulated through a permit system, although the extent of these were not found to be significant enough to require a separate sustained harvest yield calculation. None have been sold with an FSC claim to date.

Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.

6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to	NE	
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commencement of site-disturbing operations.		
6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	C	
<p>6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	C	<p>Virtual site visits confirmed the DNR process of the reviewing the the GIS layer of rare species, via the Natural Heritage Database as part of timber harvest planning. During planning, either at the time of selecting the annual stand exam list or when there is an annual plan addition, the heritage database is referenced by the appraisal forester, wildlife biologists, plant ecologists, and fisheries biologists, where appropriate. Joint site visits are scheduled, when needed, for additional surveys and to discuss needed modifications to harvest planning.</p> <p>The FME reported the following survey activities over the past year:</p> <p>Minnesota Biological Survey (MBS) conducts surveys throughout the state for rare plants and animals. MBS plant ecologists conducted the following surveys:</p> <ul style="list-style-type: none"> • Baseline botanical field surveys occurred in Koochiching and St. Louis counties in northern MN and Ottertail, Douglas, Roseau and Kittson counties in western MN. Baseline surveys include searching for and documenting rare species and county and sub-county records. • Botanical surveys focused on species of ferns and fern allies on lands of many ownerships, including certified Wildlife and Forestry lands. This is work towards a final manuscript for a <i>Ferns of Minnesota</i> book publication. • Various site or project-specific surveys occurred that involved documenting rare plant species in Benton, Stearns, and Wabasha counties. <p>MBS zoologists conducted the following surveys:</p> <ul style="list-style-type: none"> • Rare bird surveys in Winona County • Reptile surveys in Rock County

		<ul style="list-style-type: none"> • Wood Turtle surveys and telemetry in Goodhue, Rice, Steele, Wabasha counties • Wild bee surveys in Aitkin, Beltrami, Mille Lacs, Pine counties • Rare butterfly surveys in Anoka, Fillmore, Goodhue, Houston, Sherburne, Wabasha, Washington counties <p>Baseline surveys for native and rare moths in Beltrami, Clearwater, Koochiching, Lake of the Woods, and Roseau counties yielded over 2,000 specimens and include numerous new county records as well as potential new state records (identifications pending) and possible yet-to-be determined new species to science.</p> <p>Nongame Wildlife Program staff were involved in surveys for the following species on DNR Forestry and/or Wildlife lands:</p> <ul style="list-style-type: none"> • Red-shouldered Hawk (Special Concern, SPC) reassessment of historic observations • Northern Goshawk (SPC) revisit known nests to determine whether they are still active and nesting success • Monitored wood turtle nesting activity and road mortality. • Monitored breeding activity of Common Terns on WMA. • Monitored breeding activity in high priority Northern Goshawk territories. • Surveyed reported stick nests for goshawks when the stick nest had high potential for goshawk use. • Wood turtle surveys were conducted in SE MN including radio-telemetry on a WMA to better understand habitat use • Tested a pilot protocol for monitoring Blanding's turtles on and adjacent to a WMA in southern Minnesota. <p>Regional Ecologist staff were involved in surveys for the following species on DNR Forestry and/or Wildlife lands to inform planned management activities:</p> <ul style="list-style-type: none"> • Siberian yarrow (Threatened, THR) resurvey of both known occurrences in MN • Ram's-head lady's-slipper (THR) and white adder's mouth orchid (SPC) surveys of existing and potential habitat • Several rare fern species (moonworts, grapeferns) surveys of existing and potential habitat
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<p>6.2.b When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Conservation zones and/or protected areas are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p>	C	<p>The system for reviewing appropriate databases, interdisciplinary review of annual stand exam lists, and joint site visits assures that the appropriate experts are available to recommend and enforce conservation measures for RTE species, notwithstanding staff shortages for some of these experts. Interviews with Ecological and Water Resources (EWR) staff confirmed that the process is working as intended. If a joint site visit leads to a disagreement over planned harvest, an internal dispute resolution process is used to resolve the issue.</p> <p>Timber management, wildlife habitat management, and forest road construction, are the primary activities that occurred on DNR certified lands near existing protected areas or conservation zones. Forest management activities are reviewed by Fish and Wildlife and Ecological and Water Resources staff during development of the annual stand exam lists (every year in September). Additional EWR and FAW input is typically required if an initial screening identifies the occurrence of a rare species, habitat, or plant community.</p> <p>Measures are implemented to mitigate impacts to those rare features as defined by state and federal law and department policy. Often, protective measures include seasonal avoidance, buffering, or changing of a harvest prescription. Some sites get deferred from harvest to provide survey opportunities to refine RTE species distribution in these stands to minimize impacts when harvest does take place.</p> <p>Sites reviewed during the 2020 audit included examples of conservation guidelines in effect, including seasonal restrictions related to Blanding's Turtle and buffer zones around eagle nest trees.</p>
<p>6.2.c For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.</p>	C	<p>The SFRMP framework is designed to address landscape composition goals developed by the MFRF. Additionally, the NPC-based system for Desired Future Forest Condition (DFFC) and management prescriptions inherently addressed a goal of biodiversity.</p> <p>DNR participates in recovery plans for species that are listed federally and within the state. Some of the most notable examples are the eastern timber wolf, timber rattlesnake, and Karner blue butterfly.</p>
<p>6.2.d Within the capacity of the forest owner or manager, hunting, fishing,</p>	C	<p>Management activities that impact RTE species and habitats could happen, only after consultation with FAW and EWR</p>

trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).		<p>staff. Protection measures are outlined in the departments rare species guide. http://dnr.state.mn.us/rsg/index.html</p> <p>DNR's Enforcement Division takes the lead in controlling hunting, fishing, trapping, collecting and other such activities. DNR administers a host of regulations, licenses, and permits to protect state resources. ATV trail ambassadors have increased in number. Over 200 clubs now participate in that program. Interviews conducted in the field confirmed that law enforcement officers respond readily to requests from other DNR personnel.</p>
6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.		
<p>6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented <i>successional</i> stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.</p>	C	<p>Landscape planning and Section level forest resource management plans:</p> <ul style="list-style-type: none"> • Forest age classes are managed using an adaptive management approach during landscape planning. All ownership age-class information was considered in conjunction with the results of the Sustainable Timber Harvest Analysis (STHA) to inform the Department decision on harvest levels. • The STHA team assessed current age class distributions by cover type and ecological classification system (ECS) subsection using USFS's FIA (Forest Inventory and Analysis) data, CSA (Cooperative Stand Assessment) public inventory data, and DNR's FIM (Forest Inventory Module) inventory data. Staff compared current age class distributions across all ownerships to the age class goals identified in previous Section Forest Resource Management Plans (SFRMP)s. The Mason, Bruce and Girard harvest schedule model was used to project future age class distributions on DNR managed lands under different harvest scenarios. Based on these data and scenarios, DNR leadership considered the amount of older forest to maintain by cover type on DNR managed lands over the next 10 years as part of the STHA decision. • The STHA implementation team is incorporating elements of the Department decision on the harvest level goals from state managed forestland. The decision includes managing Wildlife Management

		<p>Areas under regimes designed to specifically benefit wildlife habitat, incorporate Special Management Area objectives that address diverse forest composition patterns and conditions, as well as purposefully maintaining an amount of older aspen on DNR managed lands. STHA decisions were applied immediately in FY19 and we've since incorporated them into the DNR 10 year spatial plan as well as SFRMP narratives.</p> <ul style="list-style-type: none"> • As noted in DNR's all-ownerships age-class monitoring approach, not all acres on annual stand exam lists result in timber harvest (some are deferred or altered). A portion of these deferrals and alterations will continue to provide older forest/growth stage characteristics into the future (above and beyond what is projected in modeling and planning direction). • Geography and implementation strategies for management opportunity areas (MOAs) are being finalized for two ecological classification system sections: Northern Superior Uplands (NSU) and Northern Minnesota and Ontario Peatlands (NMOP), and compiled for review in the remaining forested ecological sections on the state. Reviews include old forest management complexes, old forest patches, and habitat MOAs to emphasize older forest. The SFRMPs and MOAs will include conversion goals that were developed considering, among other things, distribution of successional stages. The SFRMPs will also provide guidance and strategies on maintaining characteristics of older forest, representing all native plant community (NPC) growth stages on state lands, and diversifying stands appropriately given their NPC. • Forest age classes are managed using an adaptive management approach during landscape planning. All ownership age-class information was considered in conjunction with the results of the Sustainable Timber Harvest Analysis (STHA) to inform the Department decision on harvest levels and management regimes by cover type, which influence age class distributions on state-administered forest land. • This year we began implementing the STH decisions through the first year of DNR's new 10-year stand exam list (FY 21). This "spatial plan" was built on modeling decisions to address multiple values,
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		<p>including managing Wildlife Management Areas and Special Management Areas under differing regimes designed to specifically benefit wildlife habitat and foster forest characteristics that address diverse forest composition patterns and conditions. In addition, modeling intentionally planned to maintain an amount of older aspen on DNR managed lands for wildlife habitat. Implementation of the 10-year stand exam list (spatial plan), starting with the FY 21 annual stand exam list, thus ensures that these values are addressed.</p> <ul style="list-style-type: none"> • As noted in DNR's all-ownerships age-class monitoring approach, not all acres on the annual stand exam lists will result in a timber harvest (for some stands management is deferred to the next planning cycle or the stand may be altered). A portion of these deferrals and alterations will continue to provide older forest or growth stage characteristics into the future (above and beyond what is projected in modeling and planning direction). Further, some stands are not harvested and have the opportunity to develop into older age classes if they are inoperable or designated as old growth. <p>Site-level management:</p> <ul style="list-style-type: none"> • During interdisciplinary site-level review and management, staff in EWR, FAW, and FOR look for opportunities to maintain older forest characteristics on DNR managed lands, particularly in special management areas (SMAs) such as Old Forest Management Complexes (OFMCs), High Conservation Value Forests (HCVF), Management Opportunity Areas (MOAs), and large old patches. • Older forest or growth stage characteristics are enhanced or maintained through application of best management practices (riparian management zones; legacy patches; retention of characteristics like snags, leave trees, and coarse woody debris). • Stands are converted to other cover types appropriate to their native plant community to contribute to SFRMP cover type goals for the section when opportunities arise. • During interdisciplinary stand review, EWR staff (Nongame Program, Regional Plant Ecologists) provide comments on opportunities to maintain or
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		<p>enhance under-represented successional stages, including maintaining older forest characteristics on DNR managed lands, particularly in Old Forest Management Complexes (OFMCs), High Conservation Value Forests (HCVF), Management Opportunity Areas (MOAs), and large old patches. In addition, EWR staff provide comments on maintaining or enhancing plant species composition and distribution, especially as it relates to rare species and species with conservation statuses.</p> <ul style="list-style-type: none"> • In addition, DNR site-level management maintains or enhances plant species composition and distribution through 1) following SFRMP guidance related to cover type distribution, which generally guides staff to maintain the distribution of cover types in the ecological section, while moving toward goals for some amount of cover type change (usually approximately 1% over 10 years) to meet various goals associated with forest values such as habitat and addressing climate change and 2) as standard practice, the DNR manages sites appropriately given their native plant community.
<p>6.3.a.2 When a <i>rare ecological community</i> is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, conservation zones and/or protected areas are established where warranted.</p>	C	<p>As confirmed in review of timber sale documentation and permits during the audit, modifications are made and implemented during harvest. The auditors observed the use of riparian buffers to protect plant species and communities. Rare ecological communities are typically identified by EWR during the annual stand exam list process.</p>
<p>6.3.a.3 When they are present, management maintains the area, structure, composition, and processes of all Type 1 and Type 2 old growth. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old</p>	C	<p>There is an existing Minnesota DNR policy regarding management in (see Amendment 2) or adjacent to designated old growth stands (see Amendment 5). DNR's current information systems do not currently allow for spatial evaluation of whether harvest has occurred in or near an old growth stand.</p> <p>A query of the FY20 stand exam list shows that 73 out of 3412 stands evaluated for harvest were within 330 feet of designated old growth stands. These stands were reviewed and management coordinated across divisions as part of regular DNR forest coordination processes. As of 7/21/20, DNR has 46,000 acres of designated old growth and 484,903 acres of candidate lowland conifer old growth (LCOG).</p>

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

<p>animal species that are characteristic of forest ecosystems within the landscape.</p>	<p>planning. Representative wildlife species are selected for each subsection, followed by management recommendations.</p> <p>Nongame Wildlife Program staff were involved in the following habitat management projects over the past year:</p> <ul style="list-style-type: none"> • Wood turtle – maintained 1 restored nesting area and protected nests from predation. • Common Tern – vegetation removed in a nesting colony on a WMA. Additional habitat enhancements include a network of fencing and string grids around the nesting area, deploying chick shelters, and gull control. <p>Worked with Forestry and Wildlife in priority locations such as MOAs, HCVFs, and locations with rare species to try to maintain or enhance habitat for nongame species. Examples include: adjusting harvests to reduce habitat fragmentation, retaining species and structural diversity to maintain or increase the habitat quality, moving stands toward an older growth stage to provide higher quality habitat.</p> <p>Management of wildlife habitats in forested areas of Minnesota includes forest and open brushland management activities on WMAs, state forests, and other public lands. This activity is needed to mitigate habitat loss, fragmentation, and degradation that are identified as the primary challenges facing forest wildlife. Almost one third of the state's 292 Species of Greatest Conservation Need (SGCN) inhabit forests. FAW Program expenses contributed to the following accomplishments reported in FY20 (note—the extent of many accomplishments were hampered by impacts of Covid-19 on work requirements and safety protocols):</p> <ul style="list-style-type: none"> • 60 acres in 2 brushland prescribed burns to enhance the quality of brushland habitats for wildlife • 1,329 acres in brushland management on 29 sites to enhance the quality of brushland habitats for wildlife • 44 acres in 5 forest prescribed burns to enhance the quality of forest habitats for wildlife • 209 acres of forest opening management on 132 openings to enhance forest habitat for wildlife that thrive on small forest openings • 3,943 acres of Forest Stand Improvements on 170 sites to enhance forest habitat for wildlife
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		<ul style="list-style-type: none"> A portion of wetland habitat maintenance, enhancement and restoration also occurs on forested lands but is not split out by certified/non-certified lands.
<p>6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</p> <ol style="list-style-type: none"> habitat for aquatic species that breed in surrounding uplands; habitat for predominantly terrestrial species that breed in adjacent aquatic habitats; habitat for species that use riparian areas for feeding, cover, and travel; habitat for plant species associated with riparian areas; and, stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem. 	C	Management activities near riparian areas are guided by Minnesota Forest Resources Councils Site-Level Forest Management Guidelines. Virtual site visits during the 2020 audit repeatedly demonstrated proper use of RMZs.
<p>Stand-scale Indicators</p> <p>6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	C	DNR staff use an ecological classification system to identify the native plant community for each stand. This information is then used to guide the desired plant species composition for the site. The DFFC prescribed for each stand reflects the strategies that will achieve the compositional goals.
<p>6.3.e When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. Native species suited to the site are normally selected for regeneration.</p>	C	Over 90% of all reproductive materials used on state forest land are native Minnesota materials. Materials are collected and deployed based on seed zones described in Division of Forestry Policy 5 – Nursery Seed Source Control nursery-seed-source-control-2016.pdf . In the event a match between seed source and planting site is unavailable, the SFNP deploys seedlings from an adjacent seed zone. In some instances, the SFNP will purchase seedlings from other public or private nurseries because the SFNP cannot supply either the number of seedlings requested or the species of seedlings requested. When this is the case, purchased seedlings are from the seed source of the planting site or from an adjacent source. Adjacency may cross statutory boundaries. For example, some plantings and sowings in southern Minnesota may be from a northern Iowa seed source.
<p>6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected</p>	C	Virtual site visits during the 2020 audit confirmed conformance with 6.3.f, see section 2.1 for field site observations. Harvested areas included reserve areas, individual snags and reserve trees, and downed woody debris.

<p>from naturally occurring processes. These components include:</p> <ul style="list-style-type: none"> a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and b) vertical and horizontal complexity. <p>Trees selected for retention are generally representative of the dominant species found on the site.</p>		
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>	C	<p>Even-aged sites visited virtually 2019 were in conformance with FRC Site Level Management Guidelines.</p>
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU. 	NA	<p>FME reported no departures from even-age management guidelines established for 6.3.g.1, and the audit team did not observe any in the field or detect any in timber harvest prescription documentation reviewed.</p>

<p>3. Is spatially and temporally explicit and includes maps of proposed openings or areas.</p> <p>4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species.</p> <p>5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.</p>		
<p>6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control <i>invasive species</i>, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species. 	C	<p>FME reported the following figures for 2020:</p> <ul style="list-style-type: none"> • The Fish and Wildlife Division reported 4,119 acres of noxious weed control on 328 sites in FY20 on all lands, but this does not differentiate certified and non-certified lands. • The Forestry Division reports that for FY2020, TIS survey acres statewide was: 41,883. TIS treatment acres statewide was 881. • The TIS program accomplishments for FY20 were above the TIS targets in both survey and treatment acres. The FY20 target for survey acres was 31,989, and the target for TIS treatment acres was 640.
<p>6.3.i In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>	C	<p>Due to COVID-19 and administrative policy that significantly reduced the number of prescribed and the number of suppressed fires, DNR conducted far less prescribed burning than in a normal year. FY2020 DNR responded to 73 fires for 374 acres burned. DNR conducted 24 Rx burns for 5599 acres, primarily FAS administered lands.</p>
<p>6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>	NE	
<p>6.5 Written guidelines shall be prepared and implemented to control erosion;</p>	NE	

minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.		
6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.	NE	
6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	NE	
6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	NE	
6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	
6.9.a The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.	C	<p>Per interviews with FME staff, and field observation, DNR no longer plants exotic tree species. Legacy plantings are being phased out, for example Scots pine (<i>Pinus sylvestris</i>), which was planted used for management purposes in the mid-1900s.</p> <p>MN DOT developed a Native Seed Mix Design for Roadsides guide in 2010, which the FME uses. The Minnesota Board of Water and Soil Resources cooperates with DNR on extensive materials related to using and restoring native vegetation. No use of exotic species was observed on areas visited in 2019.</p>

6.9.b If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	C	Site specific planting/seeding plans are used and required, even for seed mixes. Only native tree species were observed during the 2020 audit.
6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species	C	Per interviews with FME staff and field observation, there were no instances observed of exotic species used for management purposes in the focus area of the 2020 audit.
6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.	NE	

Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.

7.1. The management plan and supporting documents shall provide: a. Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands. b. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species. b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.	NE	
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i) Description and justification of harvesting techniques and equipment to be used.		
7.1.a The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.	NE	
7.1.b The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).	NE	
7.1.c The management plan describes: a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.	NE	
7.1.d The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.	NE	
7.1.e The management plan includes a description of the following resources and outlines activities to conserve and/or protect: <ul style="list-style-type: none"> • rare, threatened, or endangered species and natural communities (see Criterion 6.2); • plant species and community diversity and wildlife habitats (see Criterion 6.3); • water resources (see Criterion 6.5); • soil resources (see Criterion 6.3); • Representative Sample Areas (see Criterion 6.4); • High Conservation Value Forests (see Principle 9); • Other special management areas. 	NE	
7.1.f If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).	NE	

7.1.g The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).	NE	
7.1.h If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6.	NE	
7.1.i If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.	NE	
7.1.j The management plan incorporates the results of the evaluation of social impacts, including: <ul style="list-style-type: none"> • traditional cultural resources and rights of use (see Criterion 2.1); • potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); • management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5); • management of aesthetic values (see Indicator 4.4.a); • public access to and use of the forest, and other recreation issues; • local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g). 	NE	
7.1.k The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).	NE	
7.1.l The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems	NE	

present on the FMU.		
7.1.m The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.	NE	
7.1.n The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.	NE	
7.1.o The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.	NE	
7.1.p The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.	NE	
7.1.q Plans for harvesting and other significant site-disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, any necessary environmental safeguards, health and safety measures, and include maps of adequate detail.	NE	
7.1.r The management plan describes the stakeholder consultation process.	NE	
7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	NE	
7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.	NE	

7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	NE	
7.3.a Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	NE	
7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	C	
7.4.a While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	C	<p>Per review of the FME's website, the public summary is here: Forest Management Plan Public Summary. The full description of the FMP can be accessed here: Forest Management Plan. Several components of the management plan are available on the FME's website.</p> <p>The FMP's central webpage includes an overarching document, Description of the Components of DNR's Management Plan, which describes the main components of the FMP. Several of the links contained therein no longer function (e.g., http://www.frc.state.mn.us/index.html; http://files.dnr.state.mn.us/assistance/backyard/treecare/forest_health/invasiveGuidelines.pdf; http://mn.gov/frc/landscape-level-management-program.html; http://www.dnr.state.mn.us/forestry/subsection/index.html ; http://www.dnr.state.mn.us/forestry/subsection/blufflands/highdiversity.html; etc.)</p> <p>An updated version of the <i>Description of the Components of DNR's Management Plan</i> with fully functional links was provided to the audit team as part of addressing OBS 2019.4.</p>
7.4.b Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.	C	<p>All draft plans open for public comment are listed on the Plans open for public comment webpage. Responses to comments and any modifications made are made available to the public.</p>

Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.

8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	C	
8.1.a Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.	NE	
8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.	C	
8.2.a.1 For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	C	<p>FY20 forest monitoring activities include the following:</p> <ul style="list-style-type: none"> • Cooperative Stand Assessment (CSA): 113,229 total acres of reinventory (45,139 Contracted through Resource Assessment and 68,090 updated by Area staff). • Forest Inventory & Analysis (FIA): 1,191 Phase 2 plots measured. • Lidar Plot Based forest Inventory (PBI): 167 plots measured. • Regeneration: 6,480 acres (200 stands) aerial photographed and interpreted. • Forest Health: 13 million acres assessed and mapped aerially. • 9,000 acres surveyed for terrestrial invasive plant species.

<p>8.2.a.2 Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p>	C	<p>Blowdown or blow-over timber is tracked during annual stand exams or through regular patrols per interviews with staff. Fire damaged stands are also tracked through fire control and suppression activities. All such unanticipated losses detected are recorded, including dates, location, types of disturbance, and extent. Where possible, these areas are offered up for salvage harvests.</p>
<p>8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.</p>	C	<p>All volumes harvested converted to cord unit of measure for FY19 was 821k cord equivalents</p>
<p>8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <ol style="list-style-type: none"> 1) Rare, threatened and endangered species and/or their habitats; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4). 	C	<p>Minnesota Biological Survey continued the ongoing project of monitoring rare plants and native plant communities in the Partridge Creek HCVF site in southeast Minnesota. Pre-harvest baseline data was collected in 2019 from three long-term monitoring plots in mesic hardwood forest, including plots in forest slated for harvest as well as a plot in an area that will not be harvested in order to measure the effects of harvest on the native plant community. In 2020, work focused on data management and GIS mapping associated with the 2019 data.</p> <p>An interdisciplinary team with staff from FOR, EWR, and FAW in the Central Region created monitoring plan to evaluate harvest impacts on multiple objectives in the Collischan Bottoms HCVF site. MBS and Forestry conducted pre-harvest field surveys in summer 2020 for vegetation and rare plants. Data and specimen management from this work are in process.</p> <p>Nongame Wildlife Program staff were involved in the following monitoring efforts:</p> <ul style="list-style-type: none"> • Red-shouldered Hawk (SPC) reassessment of historic observations • Northern Goshawk (SPC) revisit known nests to determine whether they are still active and nesting success • Monitored wood turtle nesting activity and road mortality. • Monitored breeding activity of Common Terns on WMA. • Monitored breeding activity in high priority Northern Goshawk territories. • Surveyed reported stick nests for goshawks when the stick nest had high potential for goshawk use.

8.2.d.1 Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.	C	Records of close-out records for completed timber harvest permits were reviewed for a sample of timber sale permits reviewed in 2020..
8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	Per interviews with staff and observation of road upgrade and repair sites during the 2020 audit, FME regularly monitors the road system and makes timely upgrades.
8.2.d.3 The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	C	On an annual basis, the Fish and Wildlife Division contracts with the USFWS Cooperative Fish and Wildlife Research Unit to conduct statistically valid human dimensions surveys. Recent surveys have sought hunter, angler, and landowner input on panfish, turkey, deer, elk, and ruffed grouse management. In addition, FAW research staff also conduct statistically valid human dimensions mail and internet surveys. Results of these surveys are used to inform Division and Departmental decision-making. We've started work building a webpage on opinion surveys that describes some of our work.
8.2.d.4 Stakeholder responses to management activities are monitored and recorded as necessary.	C	Confirmed via review of communication records between stakeholders and the FME on setting up harvested and planned timber harvests in 2020.
8.2.d.5 Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	No such sites were reviewed in the 2020 audit, but staff interviewed were knowledgeable of procedures and policies related to consultation with tribes.
8.2.e The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	As a government agency, all costs and revenues are tracked and monitored. Annual School Trust land reports includes information on costs and revenue for the trust land https://files.dnr.state.mn.us/aboutdnr/reports/legislative/2019-transfer-certification-report.pdf
8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	NE	
8.3.a When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	NE	

8.3.b The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	NE	
8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.	C	
8.4.a The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.	NE	
8.4.b Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.	NE	
8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.	NE	
8.5.a While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.	NE	

Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.

High Conservation Value Forests are those that possess one or more of the following attributes:

- a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests,

contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance

- b) Forest areas that are in or contain rare, threatened or endangered ecosystems
- c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)

Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).

9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.	NE	
9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	NE	
9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.	NE	
9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	C	
9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.	NC	<p>Interviews with FME staff and review of documentation revealed that FME's occasional monitoring of HCVs does not fully conform with 9.4.a. There is a lack of systematic monitoring of HCVs. The audit team understands that there are aspects of HCV monitoring that are difficult to accomplish in a robust manner, however, FME approved its current list of HCVs in 2011 and thus has had some time to implement a complete monitoring system. Note that the 9.4.a does not specify the types of monitoring that are required, i.e., frequent field visits are not specifically required for monitoring, particularly for passively managed HCVs.</p> <p>Refer to CAR 2019.5, extended until the 2021 audit.</p> <p>Minnesota Biological Survey staff continued the ongoing project of monitoring rare plants and native plant</p>

	<p>communities in HCVF sites in southeast Minnesota with a survey of Partridge Creek (a state forest site). We set up three long-term monitoring plots in mesic hardwood forest, including plots in forest slated for harvest as well as a plot in an area that will not be harvested in order to measure the effects of harvest on the native plant community. This was done using the Ecological Monitoring Network protocol. In addition, we continued ongoing monitoring of the state-threatened plant fernleaf false foxglove (<i>Aureolaria pedicularia</i>) in an HCVF site in Whitewater WMA.</p> <p>An interdisciplinary team with staff from FOR, EWR, and FAW in the Central Region created monitoring plan to evaluate harvest impacts on multiple objectives in the Collischan Bottoms Forest (an HCVF site).</p> <p>Minnesota Biological Survey staff were involved in the following monitoring efforts:</p> <ul style="list-style-type: none"> • Bat acoustic monitoring occurred in Scott and Carver counties. • Dakota Skipper monitoring in Clay County. • The MBS Ecological Monitoring Network project continued collecting data from native grasslands, forests, and wetlands throughout the state as part of a long-term status and trends monitoring project. The goal is to determine how vegetation changes in response to stressors such as climate change and invasive species populations. Monitoring sites were established on a mix of ownerships throughout Minnesota over this reporting period, including certified State Forests and Wildlife Management Areas. More information on this project can be found at: Ecological Monitoring Network • MBS is collaborating with State Parks and SNA to re-sample vegetation plots (relevés) that were first collected over 20 years ago. Focus was on the North Shore Highlands subsection in NE Minnesota and on using this work to detect and describe changes in flora and vegetation over the past couple decades. • MBS conducted annual census of rare orchid populations in Kittson, Mower, Norman, Pennington, Polk and Rock Counties in conjunction with TNC, USFWS, and NPS. The annual report, 2019 Summary of Small White Lady's Slipper Activities in Minnesota, was prepared and provided to partners.
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		Long-term monitoring of the federally listed Western prairie fringed orchid continued this year, including on the Burnham Wildlife Management Area.
9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.	C	Per interviews with key staff (e.g., wildlife and ecology), FME has not observed any additional threats that staff are not already aware of and none have increased significantly.

Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1--9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.

As confirmed via field observation and review of the FMP and site-specific plans, the FME practices natural/semi-natural forest management.

Appendix 6 – Chain of Custody Indicators for FMEs Conformance Table

☒ Chain of Custody indicators were not evaluated during this evaluation.

Appendix 7 – Trademark Standard Conformance Table

1. General Requirements for Use of the FSC Trademarks

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

Description of how the FME currently uses, or intends to use, FSC trademarks and/or labels, including but not limited to printed materials, Internet applications, on-product labeling, and other public-facing media:	FME uses the FSC logo and other trademarks on its website and has received approval from SCS. No other uses were detected during the remote audit.
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☒ All known uses reviewed.

☐ Sample reviewed. Rationale that sample choice is sufficient to confirm requirements are met:

☐ Trademark uses detected include those grandfathered in under prior FSC trademark rules (e.g., FSC-TMK-50-201). Place the initials “GF” by the specific Trademark Applications above. *Note: This only applies to printed items or physical promotional materials (e.g., hats, load tickets) in stock. New printings, items, and websites must be updated per FSC-STD-50-001 requirements. If the organization only has GF uses and no new uses, the rest of this checklist is NA.*

<p>1.2 Trademark License Agreement and valid certificate</p> <p>In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate.</p> <p><i>Note: Consultations for certification Organizations applying for forest management certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.</i></p>	Maintained on file by SCS Main Office
Evidence 1.2: Maintained on file by SCS Main Office.	
<p>1.6 Product Group List</p> <p>The products intended to be labeled or promoted as FSC certified have been included in the organization's certified product group list.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS
<p>Evidence 1.6:</p> <p><input checked="" type="checkbox"/> Refer to Product Groups List in Public Summary Report;</p> <p><input type="checkbox"/> The following nonconformance(s) were detected in Product Groups:</p> <p><input type="checkbox"/> Refer to OBS related to Product Groups:</p>	
<p>1.3 Trademark License Code</p> <p>The FSC trademark license code assigned by FSC to the organization accompanies any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS
<p>1.4 Trademark Symbol</p> <p>The FSC logo and the 'Forests For All Forever' marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered.</p> <p>For use in a country where the trademark is not yet registered, use of the symbol ™ is recommended. The Trademark Registration List document is available in the FSC trade-mark portal and marketing toolkit.</p> <p>The symbol ® shall also be added to 'FSC' and 'Forest Steward-ship Council' at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure).</p> <p><i>NOTE: The use of the trademark symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer statement specified in requirement 6.2.</i></p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS <input type="checkbox"/> NA, one or more of noted exceptions applies/
<p>2.1 Restrictions on using FSC trademarks</p> <p>The organization has not used the FSC trademarks in the following ways:</p> <ul style="list-style-type: none"> a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme; b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the 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 or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be 	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS

used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements.	
2.2 Translations The name 'Forest Stewardship Council' has not been replaced with a translation. A translation may be included in brackets after the name, for example: Forest Stewardship Council® (translation)	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS <input type="checkbox"/> NA, no translations
Evidence 1.3, 1.4, 2.1, and 2.2: <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above; <input type="checkbox"/> The following nonconformance(s) were detected; or <input type="checkbox"/> Refer to OBS:	
Sections 8 and 9 Graphic Rules The organization has only used FSC logos that conform to the standard requirements governing: <ul style="list-style-type: none"> • color and font (8.1-8.3); • format and size (8.4-8.9); • label placement (8.10); and • 'Forests For All Forever' marks (9.1-9.7). 	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS
1.5 Trademark Use Approval The organization has submitted all intended uses of the FSC trademarks to SCS for approval. OR The organization has an approved trademark use management system in place. (If the organization has a trademark use management system, complete Annex A.)	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS
4.6 FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed before the products go to the final point of sale or are delivered to uncertified organizations.	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS <input type="checkbox"/> NA, trademarks no used for segregation marks/
Evidence Graphic Rules, 1.5, and 4.6: <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above; <input type="checkbox"/> The following nonconformance(s) were detected; or <input type="checkbox"/> Refer to OBS:	

2. On-Product Use of FSC Trademarks

<input checked="" type="checkbox"/> NA, no use of on-product trademarks (<i>on-product checklist may be deleted</i>)
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3. Promotional Use of FSC Trademarks

<input type="checkbox"/> NA, no use of promotional trademarks (<i>promotional checklist may be deleted</i>)

6.1 Catalogues, Brochures, and Websites When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply:	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC
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<ul style="list-style-type: none"> It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc. If both FSC-certified and uncertified products are listed then a text such as “Look for our FSC®-certified products” shall be used next to the promotional elements and the FSC-certified products shall be clearly identified. If some or all of the products are available as FSC certified on request only, this is be clearly stated. 	<input type="checkbox"/> C w/ OBS/ c/ OBS <input type="checkbox"/> NA, not using trademarks in catalogues/ brochures/websites
6.2 Sales and Delivery Documents When the FSC trademarks are included on sales or delivery document templates that may be used for both FSC and non-FSC products, the following or a similar statement is included: “Only the products that are identified as such on this document are FSC certified”. <i>NOTE: Use of the FSC claim and certificate code on the invoices does not qualify as FSC trademark use.</i>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS <input checked="" type="checkbox"/> NA, not using trademarks on templates for FSC & non-FSC products
6.3 Promotional Items All promotional items (e.g., mugs, pens, T-shirts, caps, banners, vehicles, etc.) have displayed, at minimum, the FSC logo and FSC trademark license code.	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS <input checked="" type="checkbox"/> NA, not labeling promotional items
6.5 Trade Fairs When the FSC trademarks are used for promotion at trade fairs, the organization has: <ol style="list-style-type: none"> clearly marked which products are FSC certified, or add a visible disclaimer stating “Ask for our FSC®-certified products” or similar if no FSC-certified products are displayed. <i>NOTE: Use of text to describe the FSC certification of the organization does not require a disclaimer.</i>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS <input checked="" type="checkbox"/> NA, not using trademarks at trade fairs
Section 6.6 and 6.7 Investment/Financial Claims 6.6 When investment companies or others are making financial claims based on the organization’s FSC certified operations, the organization has taken full responsibility for the use of the FSC trademarks. 6.7 Any such claims have been accompanied by the disclaimer, “FSC is not responsible for and does not endorse any financial claims on returns on investments.”	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS <input checked="" type="checkbox"/> NA, not making financial claims about FSC status
7.1 and 7.2 Other Forestry Certification Scheme Logos The FSC trademarks have not been used together with the marks of other forest certification schemes in a way which implies equivalence, or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS <input type="checkbox"/> NA, not using other scheme logos
7.3 Business Cards The FSC trademarks have not used on business cards to promote the organization’s certification. The FSC logo or ‘Forests For All Forever’ marks are not used on business cards for promotion. A text reference to the organization’s FSC certification, with license code, is allowed, for example “We are FSC® certified (FSC® C#####)” or “We sell FSC®-certified products (FSC® C#####)”.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS <input type="checkbox"/> NA, approval granted prior to July 1, 2011

7.4 Promotion with CB Logo FSC certified products have not been promoted using only the SCS Kingfisher and/or SCS Global Services logo.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS/ c/ OBS
Evidence 6.1-6.3, 6.5-6.7, 7.1-7.4: <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above; <input type="checkbox"/> The following nonconformance(s) were detected; or <input type="checkbox"/> Refer to OBS:	

Annex A: Trademark use management system

<input checked="" type="checkbox"/> NA, not using a trademark management system (<i>Annex A checklist may be deleted</i>)

Annex B, Additional trademark rules for group FM certificate holders

<input checked="" type="checkbox"/> NA, not a group FM certificate or group does not use FSC trademarks (<i>Annex B checklist may be deleted</i>)

Appendix 8 – Group Management Program

☒ This is not a group certificate, so this appendix is not applicable.