FSC® - Forest Management Digital Audit Report Supplement

Minnesota Department of Natural Resources

Minnesota, USA

SCS-FM/COC-00088N

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CERTIFIED: 31 December 2021
EXPIRATION: 30 December 2026

DATE OF FIELD EVALUATION: 27 September 2024
DATE OF REPORT FINALIZATION: 27 November 2024

TYPE OF EVALUATION: 3rd Surveillance

This document contains the conformity tables and certificate tracking information that together with the Digital Audit Report constitute a complete FSC Forest Management Audit Report.

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Appendix 1 – Staff and Stakeholders Consulted

List of FME Staff and Stakeholders 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.**

Appendix 2 – Additional Evaluation Techniques Employed

Site Visit Notes:

All sites observed had completed Stand Exam List (SEL) process 2021-2030, Appraisal documents, public bid notices and permits for sold stands. Surveys are conducted during SEL process for rare/threatened/endangered species of plants and animals. SEL list reviewed by DNR Fish and Forestry Archaeologist for cultural, historical and archaeological features.

Warroad Area: NW area of state. Administrative requirements over six counties. Large state land area. Three main offices; six WMA Areas; Eco and Waters Area; 3 State Parks. Largest State Forest-Beltrami 703k acres. 7 vacancies in area currently. Average 84 fires per year. Cooperation with 22 volunteer fire departments. 48 fire wardens, heli-base and tanker base. Average 71,871 cords per yr/5 5 yr average. Primary species are aspen and red pine. Silviculture-3.3 million seedlings in last 10 years. Aerial seeding of 3900 acres, TSI on 2000 acres, site preparation on 4000 acres. 210 miles of roads/125 miles of MMR (minimum maintenance roads). Annual kindergarten field visits for fire prevention. Stakeholders include Indigenous people, fire departments, ohv and snowmobiles, and soil/watershed districts. Tablet reporting of invasive species occurrences-Ed Maps. Integration within mapping system is conducted. Forestry-Application on mobile devices for invasive species reporting-MORE. Average of 60% from Stand Exam List to Appraisals. EWR reviews for RTE, historical and cultural occurrences during appraisals. Foresters check NHI checks prior to harvesting. Guidance documents include Timber Sales Manual and SFRMP. SRM-Silviculture and Roads Module. All timber sales are maintained within Timber sale platform. Checklist verified prior to stands being approved for auction. 2 auctions are conducted each year-public notification. Interdisciplinary framework established to provide guidance for Forestry, Wildlife, and Ecological Resource Divisions for coordination. No major complaints or regulatory issues were confirmed with personnel. No tribal issues were known. Current audit by USFWS to document wildlife values on WMA/AMA lands. Form for approval has been submitted (Habitat Value Forms) submitted for approval from Federal OIC. Initial approval of form and grant funding released. Cultural occurrences are documented within the state list; reviewed on annual basis during ASEL (annual stand exam list) process.

Red Lake WMA: Largest in state-325,000 acres. Multiple SNA and peatland. Administrator of 90k acres of LUP lands. Belongs to USFWS as National Refuge but leased to state for management. Resource Management Plan-Executed by Commissioner in Summer 2023. Increase habitat and conservation. Primary goal is wildlife habitat. System plans are in progress for smaller WMAs. SFRMP applies to WMAs.

Stop Number:

1. FAW-Site Preparation and Seeding-Permit X017359: Approximately 40 acres- thinning and clear cut. Species is Norway pine and mixed spruce. Annual Stand review, tagged for joint visit. Scarification methods were reviewed. Increase diversity within the white pine plantation. Seeding with herbaceous seeding with some long-lived conifer species. Maps and notes documented on maps. DNR performed the scarification with internal crew. Overall goal to improve the diversity and improve wildlife habitat. Chopped with dozer in 2022; seeding occurred in Fall 2022. No RTE occurrences on site. Cultural resources

(old homesite)identified from old fence posts-area protected with no activity within area. No water on site. Over story of white spruce with goal to add diversity of species. Road is mowed and part of hunter walking trail. Goal to maintain larger White Spruce (83 yr old) for conifer canopy. Acreage goals by cover types change goals are identified through the SFRMP process and may be referenced in the unit plans.. Forest health concerns from budworm. Dead stems of spruce within stand. Habitat is conducive for raptors-goshawks, bears and rough grouse. Firewood removal was restricted to maintain downed woody debris.

2. Forestry-Marked Thinning: Permit #X018269-27 acre pine marked with yellow paint. Beltrami Island State Forest-Northern Fire dependent habitat identified. State imperiled natural community identified by EWR. Maintain the species composition during harvesting operation noted within comment field of SEL. Prescription to harvest larger mature trees. No additional comments noted for occurrences of RTE, cultural or historical identification on site. Maps with old landings documented. Harvest operations were completed in Q4-2022. E H MLEP qualified logging permitee purchased and harvested the timber sale. No water or crossings on site-area consisted of 4 parcels identified with blue painted boundaries. Red boundary established for border with Tribal lands. Annual Stand Exam List (ASEL)
3. sent to all Tribal representatives for 60 day period or longer if needed. Period is usually mid-January to mid-March; comments are requested and additional 30 days extended during the public comment period. Local communication is conducted with tribal foresters. Red boundary confirmed. No damages to retained stand, snags retained. Cavities observed within snags. Low stumps and utilization of fiber.

4. FAW-Moonwarts (fern) Survey Project-Winner Day Use Silo: Due to their small size and cryptic nature, many plant species in the genus Botrychium, commonly known as moonworts, are considered rare and have been included in the Minnesota list of endangered, threatened and special concern species (ETS). Northern Minnesota, specifically the Beltrami Island State Forest and Red Lake Wildlife Management Area, has become renowned as a regional hot spot of moonwort activity after initial survey efforts in the late 2000's revealed established populations in some unusual locations, including abandoned 1930's-era homestead sites. Long lived perennial plant-up to 20 years. Majority of life is spent below ground. Above ground is to release spores and reproduce. Experts identified occurrences based on training and experience with identification in other areas of state. External rare plant practicum is required by outside contractors. Site has been surveyed multiple times. Management within forested stands contain a 250 foot buffer. Guidance for opening/homesite management includes: apply an approximately 50' buffer around the NHIS occurrence during management activities; avoid equipment travel, slash piling and landing placement within this buffer area; preferably conduct operations during frozen conditions, or at least outside of the main growing season for these species: early June-July.

5. Forestry-Permit #X019041: 49 acre Norway Pine yellow pine marked thinning and all Jack Pine. Leave reserved unmarked Norway Pine completed in Q4-2023. Conventional equipment utilized with forwarder. Harvested during extreme wet conditions. Removal of snags within 100 feet of public road. Permit purchased by E H MLEP qualified logging permitee. EWR comments to maintain species and forest cover type after harvesting. Jack pine suppression in understory of Norway pine and reaching end of life stage. Ability to increase species diversity will most likely be accomplished during next re-entry in 10+ years. Comments documented during SEL. Confirmed additional check of NHI prior to harvesting operations. No water on stand; natural boundaries utilized. Paint added to western boundary to assist operator on harvesting machine. Minimal damages to retained stand. No soil compaction issues. Contact gap on SEL-EWR noted contact; no record of contact from Forestry.

6. Jack Pine brush saw study: Approximately 152 acres started in 2023 and completed in spring 2024. - Paulsburg Wildfire in 2015. Salvage operations commenced. Some sites planted, aerial seeding and natural regeneration. Jack Pine/ Norway Pine planted at 800 trees per acre. Natural regeneration from wildfire impacts facilitated Jack Pine regeneration. Surveys confirmed 11k Jack pine seedlings/acre. Pre

commercial thinning with brush-saw contractors. Goal to leave quality Jack Pine, all red pine and remove other competition in 7 foot spacing. Sites have been thinned to 945 JP and 151 NP per acre.

7. Permit #X018607: Active 58 acre Aspen clear-cut (summer ground harvested; winter ground not completed). Purchased by C Logging MLEP qualified logging permitee and began operations in Q1-2022. Northern block (A53) and western block (A45) have been harvested. Approximately 14 acres have been completed. Reserves are protected as island/clump. Scattered aspens and conifers retained within the clear-cut areas. Scattered logging debris required within stand. Guidelines and policies are a factor in determining operability of sites. (BMP, Rutting AOSMCR). Sale boundaries are painted blue. Additional stand of Tamarack identified if available for harvest. No water or crossings on harvest blocks. Last activity was Q3-2022 due to lack of frozen ground conditions in 2023. Permit expires in May 2025. Aspen coppice regeneration observed in the clear-cut operations. No occurrences of RTE, historical or archaeological identified.

Baudette Area: Glacial soils with European settlements beginning in early 1909s.main cover types Aspen, Spruce and other lowland conifers. 80% of land base is publicly owned. Historical fire in 1910 impacting over 360k acres. Agassiz Low,ands Subsection Ecological classification category. Forestry owns 437k lands, Wildlife 156k acres and 2.6k acres by Parks. 90+% of sales sold each year, majority pulpwood market. 10.5k acres designated as old growth. Annual offered volume is 70-80k cords (2021 and up) compared to historical average of 116.5k acres. Accelerated harvest of older aspen stands to diversify species composition. Increased conflict from recreational users of public roads with logging. Forests are open with ability to utilize roads for off road vehicles. Some roads are closed to recreational user vehicles. Forest Officers are able to enforce forestry regulations.

All sites observed had completed Stand Exam List (SEL) process 2021-2030, Appraisal documents, public bid notices and permits for sold stands. Surveys are conducted during SEL process for rare/threatened/endangered species of plants and animals. SEL list reviewed by DNR Fish and Forestry Archaeologist for cultural, historical and archaeological features.

Stop Number:

1. Forestry-B015659: 23 acre Norway Pine Thinning harvested by E H MLEP qualified logging permiteecompleted in summer 2024. Prescription of harvesting every third tree or as directed. Age of stand is approximately 43 years old. Left side of public road is managed by wildlife and thinned heavier. Heavier thinning utilized to promote natural regeneration on WMA area. Harvesting was conducted with processor and forwarder. SEL completed in 2022. NHI reviewed in July 2024 prior to harvesting operations. Natural boundary with age class variation for adjoins stands. Land classification system reviewed. Sharp-tail grouse habitat management within the Red Lake WMA. Sale closed and escrow released. Site level guidelines are utilized to establish and review considerations of appraisals. Deviations from the guidelines require input. The data is stored within management system for each stand listed on the SEL. Harvest operations were conducted in professional manner, minimal damage to residual stand. Permit provisions were met.

2. WMA-Pine Thinning/Clearcut: Permit X018392: 67 acres harvested by E H MLEP qualified logging permitee. Joint visit with forestry and wildlife to adjust thinning operations and create additional openings for wildlife benefits. Multiple cutting blocks with primary being 56 acres. Some stands are thinned with one block containing a clear-cut. Variability with multiple openings. Harvesting began in June 2023 and completed in April 2024. Blue painted boundary on part of stand. Imperiled plant community adjacent to harvest area identified by EWR and noted within SEL. Protection was recommended and documented for occurrence. Reserve area retained due to clear-cut stand. Reserve of 5% of area and 10% reserved on WMA land. No water or crossings within stand. Target of 90 basal area on retained stands. Reserve area painted in blue paint and confirmed with no equipment incursion observed.

3. FAW Habitat Project: Conducted on site #2. Changes to harvesting method, utilizing scarification and piling of debris. Seeding planned of Jack pine, white pine and spruce to facilitate diversification of future cover type. Agriculture disc utilized for additional help in breaking the soil layer. Northern 1/3 stand completed. Mulching head utilized on southern part of stand, less seeding occurred due to availability. Goal to increase diversity for habitat mana into the future.

4. Red Lake WMA: Added Stop-Variable Thinning Operation. Unscheduled stop to observe thinning prescription with gap openings and additional openings created for wildlife habitat. State Forest property 20 acre planted red pine stand. Case study initiated by executive FRIT to explore alternative thinning prescriptions in 2020. 90 BA thin with skips and gaps. .25 and .5 acre gaps and equal skips in thinning prescription. Nice diversity in herbaceous layer within gaps. On 2025 SEL list. Viewed as a success. No other similar treatments initiated on DNR lands but good potential was noted by ID team

5. EWR-Norris Camp South Old Forest Management Complex (OFMC): Old growth forest-Old homestead site, picnic and public use. Site is surrounded by 40 acre designated Old Growth. Stand is approximately 137 years old; areas of mature with minimal amount of human disturbance. 330 foot buffer management zone established around Old Growth stands; limitations of only 25% of area can be harvested based on certain parameters. 340 acres surround designated old growth stand. Management Opportunity Area (MOA) identified within surrounding 340 acres. Template created with description and future direction documented. (Policy updated in May 2024 -consolidated series of historical amendments. Old growth stands are identified and documented within GIS system. Natural origin red pine-originated from natural fire event in 1800s. Old growth guidelines are documented within Old Growth Forest Policy.

6. Forestry-Spruce Clear-Cut partially harvested: Permit #X018268-125.5 acres Timber sale conducted by E H MLEP qualified logging permitee -Clear cut with reserves, painted and natural boundaries. White spruce and cedar retention maintained in reserves. Contact by EWR with forestry to retain old growth characteristics of cedar. Long lived conifers were a focus for retention. Rare plants mentioned that live in Spruce /Cedar- information. Multiple blocks with one located within OFMC area. No wildlife issues confirmed. Strip harvesting not conducted as recommended by EWR. Forestry indicated recommendation was varied due to species and historical blowdown risk-Balsam Fir. Harvesting completed in Q2-2023. **See OBS 2024.2 (DAR tab 14):** Procedures were not properly implemented for Permit #X018268 based on interviews with personnel. Contact request frow Ecological and Water Resources were documented on the SEL. Interviews confirmed a discussion was conducted between the groups C. The sale prescription was implemented differently from the SEL which resulted in an unexpected result by EWR personnel.

7. Forestry-Natural regeneration Jack Pine: Non-serotinous cones opened with sun exposure. Multiple harvested blocks with aspen and other species. Harvest operations were conducted in 2007/2008. Adequate regeneration with mixture of aspen, Jack pine and herbaceous/woody understory. Prime habitat for spruce grouse. Monitoring was conducted in 2012 with 400 trees per acre minimum free to grow stems established to ensure proper regeneration.

8. ConCon Forestry property. 97.6 acre Aspen Clearcut. 5% HWD clump reserves. Slash piled to encourage natural regeneration. Adjacent Red Lakes Tribe land. Boundary clearly marked in red paint. Notification letter sent to tribe with no response received. Appraisal signed October, 2022. Discussed appraisal process for determining minimum sale bid. Cruise done prior to determine species and products onsite. Values for species/product input by department in TSM. Forester has option to adjust prices based site conditions including haul distance. Team leader evaluates the values prior to sale being put out for bid.

Good project documentation and knowledge forester. Presale meeting and periodic inspections documented.

Littlefork Area-15 person staff, Historical 99% glacial coverage. Heavy peat component. Approximately 608k managed land. 352k acres productive timberland. 89% of lands are School Trust. Heavy timber harvesting within area. Approximately 96k cords annual target. Spruce top market. Challenges-warming climate with access to summer ground is limited. Heavy historical extensions required in timber sales. Permitee and personnel shortages. High demand and low supply. Heavy mortality impacts on Tamarack due to beetle kill. Positive cooperative agreements with other agencies and companies. Heavy dependence on forestry and logging in the area. Approximately 40 sales on auction per year. Positive relationships with other agencies, external partners and 2 Tribes confirmed by Assistant Wildlife Manager. No lands inter mixed within Tribal land but bordering property. Notification required for use of infrastructure on tribal land. Permits are issued for special products required-no tribal requests in past year.

Stop Number:

1. Forestry: Permit #B015338-53 acre Norway Pine thinning and clear cut. Harvesting operations conducted by 2 organization working under FSC & SFI Certified Company-PCA. Reserves of white pine, maples and elms. Cavity trees retained. Ground sprayed with Round-up Pro, disc trenched for reforestation. Planting of Norway, Jack and White Pine. Goal is a mixed stand in the future. NHI for plant identification near harvest site. Coordination with EWR confirmed no occurrences on site. Harvesting operations completed in Q4-2022. Permit executed for permitee to work in wetlands. No water or crossings was confirmed on site. Retention confirmed and protected-5% of sale area. Boundaries defined, good utilization and clean harvest operation. Review of Contractor-Future Forests for site preparation:

2. Forestry-Permit #X018299: 41 acre Jack Pine clear-cut with reserves harvested by D Logging MLEP qualified logging permitee. Reserve of snags, den trees and white pines. NHI occurrence for plant community identified by EWR. Avoidance of slash piles on landings was noted. Observation confirmed slash piles were retained within harvested areas. Operations began in Q4-2022 and completed in Q4-2022. Jack pine has been aerial seeded in Spring 2024. Monitoring will be conducted in year 4 to ensure adequate survival and free to grow threshold achieved. Approximately 700 Jack pines per acre. Other mixed conifer species will regenerated naturally. Regeneration checks are scheduled within SRM (Silviculture and Roads Model) until the new 4Trees system becomes operational. Forest Management Guidelines and Forest Management Wildlife Guidelines.

3. Forestry-Anchor chain Site Preparation: multiple blocks to assess regeneration of Jack pine. Observed site with anchor chain and barrel (most aggressive). Variety of chains were utilized with baseline of no chain to study the rates. Project began in 2018; hand seeded in Fall 2018. Designated plots established and first check done in 2020. Monitoring will conducted until free to grow is reached. Case studies are published within Great Lakes Silviculture Library (Created by University of Minnesota)cooperative with members able to provide comments. No chemicals were utilized on site.

4. WMA:Littlefork River WMA-640 acres managed as open lands. Wild parsnip and Meadow knapweed treated as invasive by chemical herbicide (Escort XP). Records confirmed proper use. Primary management is grouse habitat. Public hunting is available. Site is permanently managed as open land due to deed restriction from donated land. No NHS occurrences were identified. Checks are conducted on annual basis. Perpetual Conservation Agreement administered by USFWS. Prescribed burning is scheduled but no recent activity in previous 10 years. WMA will be divided into 4 burn units. Goal to maintain early

successional habitat. Heavier use during g upland bird and deer season. Lunchtime talk about bird surveys to better inform lowland conifer coordination.

Appendix 3 – Required Tracking

History of Findings for Certificate Period

Cert/Re-cert Evaluation 2021 – Principle 6, Minor 6.5.e.1; Principle 8, Minor 8.4.a
1st Annual Evaluation 2022 – Principle 4, Observation 4.4.c
2nd Annual Evaluation 2023 – Principle 1, Minor 1.1.a; Principle 6, Minor 6.1.b
3rd Annual Evaluation 2024 – Principle 6, Minor 6.1.c; Principle 7, Observation 7.3.a

Progressive HCVF Assessments

FME does not use partial or progressive HCVF assessments.

Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit

Schedule 2025 audit for same week of the year.

Requirements Reviewed in Annual Evaluation

Evaluation Year	Requirements Reviewed
2021	All – (Re)certification Evaluation
2022	FSC-US FM Standard Principle 7, Principle 8, and Criterion 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 6.5, 6.9, and 9.4; SCS COC Indicators for FMEs; and FSC Trademark standard.
2023	FSC-US FM Standard Principles 1, 2, 5, and Criterion 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 6.5, 6.9, and 9.4; SCS COC Indicators for FMEs; and FSC Trademark standard.
2024	FSC-US FM Standard Principles 3, 5 and 4 and Criterion 1.5, 2.3, 3.2, 4.2, 4.4, 6.2, 6.3, 6.9, 8.2, 9,1, 9,3 and 9.4 FSC Chain of Custody and Trademark standard.

Appendix 4 – Forest Management Conformance Table

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.

REQUIREMENT	C/NC	COMMENT/CAR
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 ***Forest Management Unit*** (FMU).	C	Per interviews with staff, the DNR has law enforcement and state lands staff that handle access, theft, trespass, and other issues related to illegal and unauthorized activities. State Forest rules, as well as hunting, fishing, ATV, and other recreation use regulations, are available to the public online. Additionally, as evidenced through site visits, the state lands sampled for the audit were well marked with signage describing allowed and disallowed uses. Several sites also had kiosks at parking lots and other access points that prominently displayed the regulations and communicated other information (e.g., active timber sales) to the public.
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	The MN DNR Timber Manual includes procedures for handling illegal activities such as trespass. As described in the evidence of conformance for Indicator 1.5.a, the DNR has law enforcement; those individuals are trained to handle situations of illegal or unauthorized activities and will bring in other enforcement personnel if needed. Interviews with DNR staff and field observations confirmed that OHV clubs are active in self-policing and try to keep their membership from riding on unauthorized trails. Observed posting of numerous signs instructing riders to act responsibly. 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.

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

REQUIREMENT	C/NC	COMMENT/CAR
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 ***disputes*** arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.	C	FME staff reported that there are no new or unresolved disputes over tenure claims and use rights. During virtual 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	No significant disputes over tenure or use rights were detected during the audit.

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.

REQUIREMENT	C/NC	COMMENT/CAR
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.	NA	MN DNR lands are not owned or controlled by indigenous peoples.
3.1.a Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.	NA	MN DNR lands are not owned or controlled by indigenous peoples.
3.1.b The manager of a tribal forest secures, in writing, informed consent regarding forest management activities from the tribe or individual forest owner prior to commencement of those activities.	NA	MN DNR lands are not owned or controlled by indigenous peoples.

REQUIREMENT	C/NC	COMMENT/CAR
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	In 2014, the MN NDR issued Operational Order 129, which covers procedures for communications, coordination, and documentation of work between the DNR and Minnesota's 11 federally recognized Tribal Nations on coordinated conservation, resource protection, and land management activities. The DNR provides tribes with the annual stand exam list. The department works with the 1854 Treaty Authority and the Great Lakes Fish and Wildlife Council. Minnesota Indian Affairs Council of the State of Minnesota, established in 1963, serves as a liaison between Indian tribes and the state of Minnesota. It promotes inter-governmental cooperation on fish and game regulations, forestry, mining, and other natural resources and cultural issues. The MN DNR maintains a database to record contacts between staff and tribal representatives. It includes thousands of records compiled since the 2014 Operational Order. The MN DNR has reported 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. MN DNR hired full-time tribal liaisons. The tribal liaisons roles is specifically focused on engagement (formal government-to-governement consultation, technical coordination, etc.) with tribal governments through their elected leaders and staff. The liaisons and the departments Commissioner meet annually, and separately, with Minnesota's tribal nations to consult on a range of issues that may affect their rights and resources. Additionally, the departments regional directors meet regularly with tribal natural resources directors to coordinate on a range of issues of mutual interest.

REQUIREMENT	C/NC	COMMENT/CAR
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	The MN DNR has dedicated archeological staff to protect cultural resources. The State Archaeologist publishes an annual Forest Heritage Program Report. The program conducts reviews of timber sales and other division activities that were considered to have the potential to affect known or previously undocumented heritage resources. Archival and field research is conducted for Division of Forestry and Division of Fish and Wildlife projects. Archaeological sites or other potentially significant properties are identified. The MN DNR has reported 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. As explained under the evidence of conformance for Indicator 3.2.a, MN DNR hired a full-time tribal liaisons. The tribal liaison's role is specifically focused on engagement (formal government-to-government consultation, technical coordination, etc.) with tribal governments though their elected leaders and staff. The liaison and the departments Commissioner meet annually, and separately, with Minnesota's tribal nations to consult on a range of issues that may affect their rights and resources. Additionally, the departments regional directors meet regularly with tribal natural resources directors to coordinate on a range of issues of mutual interest.

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

REQUIREMENT	C/NC	COMMENT/CAR
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 maintains a robust health and safety program for its field operations. All field stops began with a safety briefing. No violations of safety regulations were viewed during the audit.
4.2.b The forest owner or manager and their employees and contractors	C	Timber harvest permits reviewed in the 2024 audit have clauses that refer to related timber

REQUIREMENT	C/NC	COMMENT/CAR
demonstrate a safe work environment. Contracts or other written agreements include safety requirements.		purchasing documentation, such as the purchaser registration authority, which requires that the purchaser submit evidence of licenses/training certification to conduct timber harvests per applicable laws and regulations. No safety issues were observed during field visits. Each day began with a safety briefing describing any site-specific hazards the audit team should be aware of.
4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan.	C	Interviews with logging permitee confirm that they are trained. Per interviews with FME staff, loggers must submit evidence of training and qualification via an online system so that the FME can verify trainings, insurance, and other required records before loggers can begin work.
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: Archeological sites and sites of cultural, historical and community significance (on and off the FMU; Public resources, including air, water and food (hunting, fishing, collecting); Aesthetics;	C	As a public agency, the MN DNR offers a number of opportunities to collect information about social impacts and incorporating that understanding into management planning and operations. The 2024 FSC audit team confirmed multiple avenues of public outreach and a system to receive and address comments during forest management planning. For example, the MN DNR annually distributes for public review the Annual Stand Exam List, which is a primary opportunity for public input on specific proposed harvests. As part of ongoing forest management planning, the agency also sends the Annual Plan Additions for review. Additionally, the MN DNR utilizes advisory groups for planning on management of selected topics. For example, the DNR Sustainable

REQUIREMENT	C/NC	COMMENT/CAR
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.		Timber Harvest Analysis stakeholder advisory group provides input to the Governor-directed analysis of sustainable timber harvest levels on the FMU. The MN DNR has dedicated archeological staff to protect cultural resources. The State Archaeologist publishes an annual Forest Heritage Program Report. The program conducts reviews of timber sales and other division activities that were considered to have the potential to affect known or previously undocumented heritage resources. Archival and field research is conducted for Division of Forestry and Division of Fish and Wildlife projects. Archaeological sites or other potentially significant properties are identified. FME engages with local citizens, trail users and stakeholder groups on the proposed forest management of DNR lands.
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.	C	The DNR seeks and considers input on management planning annually. For example, the "Summary of NMOP SFRMP Comments and Responses" dated January 12, 2021. A novel survey was used to solicit more detailed feedback on the use of the SFRMP process. Other activities used to evaluate social impacts include the Annual Stand Exam List, Annual Plan Additions list, and unique forest management planning projects such as the lowland conifer old growth designation project.
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 management planning documents are posted on the FME's website prior to the commencement of operations so that the public may comment. Per interviews with staff, FME also contacts adjacent land managers or owners to avoid any potential negative impacts near property boundaries.
4.4.d For ***public forests,*** consultation shall include the following components:	C	The MN DNR Internet provides links to the following current public input opportunities, https://engage.dnr.state.mn.us/. Upcoming

REQUIREMENT	C/NC	COMMENT/CAR
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; 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; 3. An accessible and affordable appeals process to planning decisions is available. Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.		timber harvest plans are listed and mapped on "Annual stand exam lists" and Forest View web pages. Public comments on preliminary harvests are welcomed. Minnesota statutes and administrative rules provide for an appeals process (e.g., https://www.revisor.mn.gov/rules/4410.0400/).

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.

REQUIREMENT	C/NC	COMMENT/CAR
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.	C	
5.1.a The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.	C	Funding for state agencies is contained in the Biennial (two-year) Budget that is presented by the Governor to the State Legislature for review and passage into law during the odd-year legislative session. Review of land management activities during the audit demonstrated that the FME is generally able to implement its planned activities.
5.1.b Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.	C	Harvest levels have been set through DNR's Sustainable Timber Harvest Analysis and are not modified based on short-term financial factors.
5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	C	
5.2.a Where forest products are harvested or sold,	C	Timber sales are offered for sale in a way that provides opportunities for small and local harvesters. Of the harvests reviewed during this

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opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service.		audit, all had taken place with logging companies based in the county the forest was located.
5.2.b The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.	C	Utilization monitoring protocols are enforced through timber sale administration and documented in inspection forms. Loggers are assessed for merchantable material left in woods. Appraisal processes assures appropriate value and use. The state permits harvest of decorative trees and boughs. The paper sector, saw timber markets, biofuels, recreation, and hunting are promoted.
5.2.c On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.	C	Nearly half of all timber sales are listed as intermediate auctions, in which bidding companies cannot have more than 30 employees.
5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	C	
5.3.a Management practices are employed to minimize the loss and/or waste	C	Loss and waste of forest products are minimized through sale supervision, and permit penalties if necessary.

REQUIREMENT	C/NC	COMMENT/CAR
of harvested forest products.		
5.3.b Harvest practices are managed to protect residual trees and other forest resources, including: • soil compaction, ***rutting*** and erosion are minimized; • residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; • damage to NTFPs is minimized during management activities; and • techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible.	C	Soil compaction, rutting, and erosion are controlled through sale supervision. Contracts and harvesting permits specify best management practices required to be followed. Sales are routinely limited to frozen ground harvesting in order to protect soil resources. Harvest units reviewed during this audit did not show any significant cases of residual tree damage.
5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	C	

REQUIREMENT	C/NC	COMMENT/CAR
5.4.a The forest owner or manager demonstrates knowledge of their operation's effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.	C	As the state natural resource department, the DNR tracks its impact on the forest products industry and statewide economy. The recent STHA was primarily conducted in response to a request from the forest products industry to see whether the allowable harvest could be raised.
5.4.b The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.	C	In addition to traditional timber resources, the DNR manages diverse economic uses, such as recreation, watershed management, and non-timber forest products.
5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.	C	
5.5.a In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration,	C	It is part of DNR's core mission to manage for a variety of public values, including having forestland open for a variety of public recreation, maintaining habitat for fish and game populations, and preserving forests for municipal water sources.

REQUIREMENT	C/NC	COMMENT/CAR
recreation and tourism.		
5.5.b The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.	C	DNR's mandate to manage for multiple uses is considered and implemented through its management planning process.
5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.	C	

REQUIREMENT	C	COMMENT/CAR
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. The sustained yield harvest level calculation for each planning unit is based on: • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other		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. 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: https://www.dnr.state.mn.us/forestry/harvest-analysis/index.html. 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. There has been no change in this approach in the last year. In February 2018, DNR determined that the sustainable harvest level from DNR-managed forestlands for the next 10-years is 870,000 cords annually. This 10-year number reflects careful balancing of the multiple purposes for which state forestlands are managed.

REQUIREMENT	C/NC	COMMENT/CAR
management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.		
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: Average of 900k cords offered per year over the 10-year period FY2024 Harvest: 726,690 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	C	Field sites reviewed during the 2024 audit confirmed that individual stands are being managed in a way to achieve desired future conditions and maintain health and quality across the FMU.

REQUIREMENT	C/NC	COMMENT/CAR
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.		
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.

REQUIREMENT	C/NC	COMMENT/CAR
6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.	C	
6.1.a Using the results of ***credible scientific analysis, best available information*** (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes: 1) Forest community types and development, size class and/or successional stages, and associated ***natural disturbance regimes***; 2) ***Rare, Threatened and Endangered (RTE)***	C	MN DNR employs an extensive set of databases to assess conditions on the FMU, and the uses of these data provide the foundation for each of the seven SFRMPs. MN DNR is using a "refreshed" intranet system, the "Interdisciplinary Forest Management Policy System", that was completed in summer 2021. Along with Quicklayers and other GIS feature classes, the DNR maintain a continuously updated reference database. Locations of rare and threatened species and communities are maintained in the Natural Heritage Information System (NHIS). DNR has published a Field Guide to the Native Plant Communities of Minnesota, which describes natural disturbance regimes and successional pathways for Native Plant Community (NPC) classes. Minnesota's Comprehensive Wildlife Conservation Strategy and the State Wildlife Action Plan provide species distribution maps, habitat relationships, and baseline information including general description, legal status, life history, ecology, reproduction, population trends, distribution and abundance, habitat relationships, special requirements, and site- and landscape-level management. Division

REQUIREMENT	C/NC	COMMENT/CAR
species and ***rare ecological communities*** (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) ***Soil resources***; and 6) ***Historic conditions*** on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions.		of Fish and Wildlife (FAW) has numerous other plans for individual species or groups of wildlife that require similar habitat types. Water and soil resources are maintained in GIS and is used in all levels of assessment. 1840s pre-settlement vegetation information is another GIS layer used in assessments.
6.1.b Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a. The assessment must incorporate the ***best available information***, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be	C	The STH process produces a detailed list of DFFCs for both long and short term, and a list of stands to be treated over a seven-year period. Each year, a list of stands is proposed for appraisals by foresters, wildlife biologists, ecologists, and fisheries biologist, where applicable. For a 30-day period, the list of stands is available for review by personnel in FAW and EWR. Most of the examination is a desk review using GIS data layers, but joint site visits are conducted upon request by FAW or EWR personnel. The DNR Timber Sales Module system now requires the NHI checkbox to be completed prior to the Permit to Cut going into active status. Staff indicated the NHI is checked frequently throughout the planning process.

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impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.		
6.1.c Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.	NC	Site-level guidelines and silviculture prescriptions are completed for each timber stand prior to active management. Both are based on the identification of native plant communities (NPCs) and site-level ecological classification. These are shared with staff from EWR and FAW for comments and/or joint site visits before prescriptions are finalized. The DNR Interdisciplinary Coordination approach used to develop field prescriptions and harvest specifications follows the Direction Memo updated September 9, 2024. The Direction states that a project initiator is responsible for contacting a requesting division to schedule a JSV or making a requested contact if applicable. Furthermore, the project initiator must document in the SEL 1) the date(s) that the JSV or requested Contact occurred and the staff involved; and 2) include a description of how interdisciplinary input was incorporated in the silvicultural prescription, or if it was not included, a description of the reasons why. This should go in the Prescription Rationale section (Box 10) in SEL. A comment indicating that the issue is closed should also be made in the SEL comments section. However, the Direction Memo does not require the project initiator to contact the requesting division to notify them the matter has been considered closed and thereby afford the requesting division the opportunity to utilize dispute resolution procedures in a timely manner.

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		The Dispute resolution procedure is a documented component of the DNR Interdisciplinary approach to completing field prescriptions and harvest prescriptions. Therefore, without adequate provisions within the Direction Memo for the resolution procedures to be utilized in a timely manner, the actual prescriptions developed by DNR staff do not fully comply with stated Interdisciplinary approach resulting in a non-conformance with FSC indicator 6.1.c. Subsequently a Minor Corrective Active Request being issued. **See CAR 2024.1**
6.1.d On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.	C	DNR has an extensive library of plans, forms, and worksheets, which are available to the public through web pages supported by the Department. Among these are SFMRPs, lists, and maps of stands selected for appraisal, silvicultural interpretations, and more. Development and revision of SFMRPs have a clearly defined role for public involvement.
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	

REQUIREMENT	C/NC	COMMENT/CAR
6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present. Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.	C	The Natural Heritage Information System database is used prior to site-disturbing management activities to identify locations of threatened and endangered species. Area foresters review GIS layers for RTE species. 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. Auditors examined stand maps to confirm overlays of rare species and communities. Additionally, surveys are conducted each year by biologists. Minnesota Biological Survey (MBS) plant ecologists and zoologists conduct surveys throughout the state for rare plants and animals. Examples of recent survey work include baseline botanical field surveys in northern MN to search for and document rare species and county and sub-county records, and rare mammal, reptile, and invertebrate surveys at locations across the state. Regional Nongame Wildlife Specialists and Regional Ecologists coordinate and conduct surveys for rare species on DNR Forestry and/or Fish and Wildlife lands. Examples of recent survey work include red-shouldered hawk (Species of Special Concern, SPC) reassessments of historic observations, and surveys of existing and potential habitat for several rare fern species (moonworts, grapeferns).
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,	C	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. This interdisciplinary system offers Management Opportunity Areas (MOAs). MOAs are geographic areas where collaboration is front-loaded. They are specific to sub-landscape scales where it benefits the foresters for advanced planning. 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.

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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.		Forest management activities are reviewed by Fish and Wildlife and Ecological and Water Resources staff during development of the annual stand exam lists. Additional EWR and FAW input is typically required if an initial screening identifies the occurrence of a rare species, habitat, or plant community. 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. 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 (FAW) and Ecological and Water Resources (EWR) staff during development of the 10 year stand list and 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. 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 distributions or in cases where active management may be detrimental to the species' persistence on a site. Infrequently, departures from these approaches occur, including the use of interdisciplinary dispute resolution. Differences in management priorities regarding RTE species, habitats, and plant community management can be addressed through formal or informal dispute processes involving multiple DNR Divisions (for example, formal dispute in Region 2 recently resolved Botrychium management questions).
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	C	The SFRMP framework is designed to address landscape composition goals developed by the MFRC. Additionally, the NPC-based system for Desired Future Forest Condition (DFFC) and management prescriptions address biodiversity goals. 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, Karner blue butterfly, and long eared bat.

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biodiversity conservation goals.		
6.2.d Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).	C	Interdisciplinary Forest Management Policy System provides protection measures for rare species guide. http://dnr.state.mn.us/rsg/index.html. 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. Management activities that impact RTE species and habitats could happen, only after consultation with FAW and EWR staff. Some high level protection measures are outlined in the department's online rare species guide. Application of these measures varies by land status and endangerment status. State listed species of special concern and species in greatest conservation need (which are not statutorily protected) are more likely to be impacted on lands where economic objectives are prioritized.
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.	C	
6.3.a. Landscape-scale indicators		
6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented ***successional*** stages in the FMU that would naturally occur on the types of sites found on	C	Landscape planning and Section level forest resource management plans: Landscape planning and Section level forest resource management plans: 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

REQUIREMENT	C/NC	COMMENT/CAR
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.		by cover type, which influence age class distributions on state-administered forest land. 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 FME continued implementing the STH decisions through the DNR's 10-year stand exam list (FY 22). This "spatial plan" was built on modeling decisions to address multiple values, 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. 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) were finalized for the forested ecological sections in the state. These 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. In addition, DNR site-level management maintains or enhances plant species composition and distribution by (1) following SFRMP

REQUIREMENT	C/NC	COMMENT/CAR
		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. Site-level management: During interdisciplinary site-level review and management, staff in EWR, FAW, and FOR look for opportunities to maintain or enhance under-represented successional stages and 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. 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. 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. 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. 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 FY22 (note—the extent of

REQUIREMENT	C/NC	COMMENT/CAR
		many accomplishments were still impacted by impacts of Covid-19 on work requirements and safety protocols): acres in brushland prescribed burns to enhance the quality of brushland habitats for wildlife acres in brushland management on sites to enhance the quality of brushland habitats for wildlife acres in forest prescribed burns to enhance the quality of forest habitats for wildlife acres of forest opening management on openings to enhance forest habitat for wildlife that thrives on small forest openings acres of Forest Stand Improvements on sites to enhance forest habitat for wildlife A portion of wetland habitat maintenance, enhancement, and restoration also occurs on forested lands but is not split out by certified/non-certified lands.
6.3.a.2 When a ***rare ecological community*** is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, ***conservation zones*** and/or ***protected areas*** are established where warranted.	C	The Minnesota Biological Survey (MBS) conducts surveys, county-by-county, to search for and map rare ecological communities as well as individual plants and animals. MBS surveys have been completed in most areas of the State. These are the most remote areas of the State and encompass vast natural landscapes, so the surveys in these areas will require several more years to complete. NCS plot sampling, conducted by field foresters, also functions to identify rare communities if encountered. Information on rare communities is entered into the Natural Heritage database, which is reviewed prior to harvests. SFRMPs goals for DFFC of vegetation communities include rare, as well as common, communities. Form the Mille Lacs Uplands plan, for instance: "native plant communities that were historically well represented in the planning area are well represented today." Many rare natural communities are protected as State Natural Areas (SNAs), or HCVFs. Many of the wetland communities benefit from state BMPs. 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. There is an existing Minnesota DNR policy regarding management in (see Amendment 2) or adjacent to designated old growth stands (see Amendment 5). DNR is in the process of revising the Old Growth Forest Policy as part of the lowland conifer old growth (LCOG) project.

REQUIREMENT	C/NC	COMMENT/CAR
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. Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate). Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area,	C	DNR began to address the protection of old-growth forests in 1983; produced the first draft of Old-Growth Forest Guidelines in 1988; and implemented the guidelines with a systematic inventory in 1998. As field staff encountered and scored candidate stands, those stands were dropped from the listing of stands to be appraised for harvest, and coded for protection instead. Currently, 44,000 acres of old-growth forest are protected on lands managed by the Division of Forestry. There is no distinction between Type 1 and Type 2 old growth—all designated old-growth stands are protected from harvesting. An old-growth red pine stand was visited during the audit. The process continues today, with an emphasis on lowland conifer types, which were not included in old-growth designation to date. Lowland conifers are abundant in Minnesota, comprising about 50 percent of state lands with ample opportunity to identify and reserve old-growth types. Seventeen NPC types have been identified and as being evaluated as SFRMPs are revised. This includes 41,200 acres of lowland conifers that are reserved from harvest while the process of designating old-growth in lowland conifers proceeds. There is an existing Minnesota DNR policy regarding management in (see Amendment 2) or adjacent to designated old growth stands (see Amendment 5). DNR revised the Old Growth Forest Policy as part of the lowland conifer old growth (LCOG) project.

REQUIREMENT	C/NC	COMMENT/CAR
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). 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). 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: ▪ Old growth forests comprise a significant portion of the tribal ownership. ▪ A history of forest stewardship by the tribe exists. ▪ High Conservation		

REQUIREMENT	C/NC	COMMENT/CAR
Value Forest attributes are maintained. ▪ Old-growth structures are maintained. ▪ Conservation zones representative of old growth stands are established. ▪ Landscape level considerations are addressed. re species are otected.		
6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.	C	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 planning. Representative wildlife species are selected for each subsection, followed by management recommendations. The newly revised SWAP provides excellent guidance to habitat priorities, with numerous overlays that define priority sites and landscapes. A portion of the statewide sales tax helps fund habitat projects. Two such cooperative projects were inspected during the audit. See evidence provided in 6.3.a.1. 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 planning. Representative wildlife species are selected for each subsection, followed by management recommendations. 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.

REQUIREMENT	C/NC	COMMENT/CAR
6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of ***Riparian Management Zones (RMZs)*** to provide: a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent ***aquatic habitats***; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.	C	RMZs are addressed in Minnesota's Forest management Guidelines. The guidelines are a 590-page document, but a smaller pocket-sized handbook was printed more recently and was observed frequently in vehicles and cruiser's vests during the audit. Site visits featured several examples of buffer strips along RMZs, where foresters routinely left more than the minimum BA and often delineated a buffer strip that was wider than required. No vernal pools were observed during site visits, but field interviews revealed familiarity by foresters and cited examples of appropriate management around such pools. Management activities near riparian areas are guided by Minnesota Forest Resources Councils Site-Level Forest Management Guidelines. Site visits during the 2024 audit repeatedly demonstrated proper use of RMZs. Management activities near riparian areas are guided by Minnesota Forest Resources Councils Site-Level Forest Management Guidelines. There is no current way to evaluate the number of departmental management activities that occurred near riparian areas over the course of a specific year.
Stand-scale Indicators **6.3.d** Management practices maintain or enhance plant species composition,	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.

REQUIREMENT	C/NC	COMMENT/CAR
distribution and frequency of occurrence similar to those that would naturally occur on the site.		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.
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.	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, https://files.dnr.state.mn.us/forestry/ecssilviculture/policies/dp5-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. The State Forest Nursery (SFN) deploys seedlings from an adjacent seed zone when necessary. In some instances, the SFN will purchase seedlings from other public or private nurseries because the SFN 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 or southwest Wisconsin seed source. The Division of Forestry will be updating seed source control policy in 2022 to include seed transfer guidance for common Lakes States species and provide additional direction for climate related assisted migration projects. The SFN, Silviculture and Tree Improvement Programs will adopt the USDA Forest Service Eastern Seed Zones as part of its policy revision.
6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring	C	The criteria to retain stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees are detailed in the Minnesota Forest Management Guidelines and summarized in the field handbook. Harvested stands inspected generally had legacy and leave tree retention levels consistent with these guidelines. A Green Tree Retention Tipsheet was developed in response to a previous CAR, and is being used as a field reference for retention guidance. Legacy trees have been addressed in a separate directive from the Commissioner's Office in 2012.

REQUIREMENT	C/NC	COMMENT/CAR
processes. These components include: a) large live trees, live trees with decay or declining health, ***snags***, and well-distributed coarse down and dead woody material. ***Legacy trees*** where present are not harvested; and b) vertical and horizontal complexity. Trees selected for ***retention*** are generally representative of the dominant species found on the site.		The department's leave tree and snag guidelines require that "a mix of species representative of the original stand be retained" unless reasons for variance are documented. Foresters interviewed understand and are increasing their compliance with the intent of the guidelines for retaining live trees in their prescriptions. Auditors observed many harvest sites that contained reserve patches. Site visits during the 2024 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. DNR timber sales permits are required to follow the Minnesota Forest Resource Council's Site Level Management Guidelines that cover live, standing, and downed woody debris retention

REQUIREMENT	C/NC	COMMENT/CAR
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. 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.	C	Even-aged sites visited in 2024 were in conformance with FRC Site Level Management Guidelines.

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: 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the ***best available information*** including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to	C	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.

REQUIREMENT	C/NC	COMMENT/CAR
confirm the preceding findings.		
6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control ***invasive species***, including: 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	DNR has a well-developed program for identifying, controlling, and monitoring invasive species. Responsibility is shared with the state Department of Agriculture and the US Forest Service. DOA's Plant Protection Division is responsible for risk assessments related to invasive plants. The State Invasive Species Strategy categorizes risks. The department has an Invasive Species Control Program. Operational Order 113 (9/21/17) outlines invasive species control and prevention measures that occur on an annual basis. Buckthorn, barberry, and sweet fern are of most concern. Specific acres of treatment with herbicides have been reported to SCS Global. The MNDNR program includes Four Regional Forest Health Specialists and one Forest Health Program Consultant. . Area foresters call on health specialists and the Invasives Species Consultant as needed. The Forest Health program conducts training and outreach in part through Forest Health Newsletters issued 4-6 times per year. Forest health issues of current concern include eastern larch beetle, spruce budworm, oak wilt, Heterobasidium Root Disease, and Diplodia in red pine. Site visits included examples of invasive plant control. "Op. Order 113 [Invasive Species] is applicable to timber sales planning and management activities. Indeed, during the audit, the daily safety briefing in Area offices included special precautions about inadvertent transfer of seeds from one site to another.

REQUIREMENT	C/NC	COMMENT/CAR
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.	C	In addition to its land management role, the DNR is a primary fire suppression agency in the state. This includes engaging in prescribed burns where feasible.
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 ***exotic species*** 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	DNR does not plant exotic tree species. DNR takes measures to control and eradicate Scots pine, which were planted in the mid-1900's. MN DOT developed a Native Seed Mix Design for Roadsides (accessed 9/29/21) guide in 2010. The Minnesota Board of Water and Soil Resources cooperates with DNR on extensive materials related to using and restoring native vegetation. 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 (*Pinus sylvestris*), which was planted used for management purposes in the mid-1900s. No use of exotic species was observed on areas visited during the audit.
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 audit.

REQUIREMENT	C/NC	COMMENT/CAR
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 areas of the audit.
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.	Obs	During a site visit to harvest operation in the Norris Camp Old Forest Management Complex (Permit XO18268), it was observed that a key component of the harvest prescription documented in the SEL was not carried forward to the Timber Appraisal Form or Cutting permit. Auditors did not find written procedures or training records indicating that staff is properly carrying prescriptions developed under the Interdisciplinary Framework used to complete the SEL are being incorporated into the final harvest specifications. Therefore an OBS is issued under indicator Indicator 7.3.a (OBS 2024.2)

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.

Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.

REQUIREMENT	C/NC	COMMENT/CAR
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	Since the last FSC audit, forest monitoring activities includes, and were not limited to, the following: • Staff continue to measure 1/10-acre plots (PBI) across most public ownership to use in conjunction with remote sensing data (lidar & imagery) to create a highly accurate forest inventory across these ownerships. This data, along with aerial photography and other remote sensing data are currently being used to investigate how to improve old growth forest monitoring. • The five-year FIA measurement cycle continues every year, which provides the state and federal agencies information about growth rates, regeneration, harvests, natural changes, and general forest conditions statewide. • Guideline monitoring of approx. 100 harvested sites continue annually as well. • All of this information provides critical data about the state's forested landscape and the changes occurring annually.
8.2.a.2 Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and	C	Blowdown or blown-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.

REQUIREMENT	C/NC	COMMENT/CAR
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.		
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.	C	All volumes harvested converted to cord unit of measure for FY21 was 661,671 cords. FY22--744,893 FY23--694,126 FY24 726,690
8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of: 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	C	In addition to survey efforts, staff within EWR (Minnesota Biological Survey, Regional Nongame Wildlife Specialists, Regional Ecologists) participate in a range of monitoring activities. Examples from the last year include, among others: 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: https://www.dnr.state.mn.us/mbs/ecologicalmonitoring/index.html Salamander Research Project-Monitoring of response of special concern species (Goshawks, 4 toed salamanders, etc.) to forest management activities. Salamanders were first found in 1994 in MN. Lived in upland mixed deciduous forest with vernal pools. Occurrence in small isolated pockets. Western edge of range; occur in all states in small isolated pockets. Identified as species of State special concern. Survey in spring as females lay eggs in vernal/wet areas. One to three years of pre-harvest monitoring records desired. Three years of post-harvest monitoring. Survey of vernal pools are buffered at 350 feet to monitor effects of forest management activities. Historical wetlands are flagged and normal

REQUIREMENT	C/NC	COMMENT/CAR
(see Criterion 9.4).		protection is implemented during management. Funded graduate student at St Cloud University. 1st survey conducted in 2023 with 44 wetlands. Results published in "**Monitoring the Response of Rare Forest Dependent Wildlife Populations to Forest Management: Four-toed Salamander Monitoring**" document.
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 visited during the audit.
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 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 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, in-house research staff also conduct statistically valid HD mail and internet surveys. Results of these surveys are used to inform Division and Departmental decision-making. FME has started work building a webpage on opinion surveys that describes some of its work: http://www.dnr.state.mn.us/wildlife/research/surveys/index.html

REQUIREMENT	C/NC	COMMENT/CAR
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 visited during the audit.
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 2024 audit, but staff interviewed were knowledgeable of procedures and policies related to consultation with tribes. FME also conducted a training on cultural sites that tribes participated in.
8.2.e The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	Plan monitoring for costs and revenues associated with the FME's operations are done on an annual and ongoing basis. Annual School Trust land Cost Certification reports also include information on costs and revenue.

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:

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

Forest areas that are in or contain rare, threatened or endangered ecosystems

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).

Note: In the Lake States-Central Hardwoods region, old growth (see Glossary) is both rare and invariably an HCVF.

In the Lake States-Central Hardwoods region, cutting timber is not permitted in old-growth stands or forests.

Note: Old forests (see Glossary) may or may not be designated HCVFs. They are managed to maintain or recruit: (1) the existing abundance of old trees and (2) the landscape- and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes.

Old forests that either have or are developing old-growth attributes, but which have been previously harvested, may be designated HCVFs and may be harvested under special plans that account for the ecological attributes that make it an HCVF.

Forest management maintains a mix of sub-climax and climax old-forest conditions in the landscape.

REQUIREMENT	C/NC	COMMENT/CAR
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.	C	

REQUIREMENT	C/NC	COMMENT/CAR
9.1.a The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F. Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.	C	A summary of the DNR's HCVF approach is available on their website: https://www.dnr.state.mn.us/forestry/certification/hcvf.html The initial identification of the HCVFs were composed primarily of the all Minnesota Biological Survey (MBS) sites of outstanding and high biodiversity significance. The DNR maintains a shapefile of all sites specifically identified as designated or managed HCVF, including the currently identified 82 HCVFs, on 262,000 acres. These layers are used by staff in the Stand Exam process and all stands within these areas are tagged for a joint site visit. The layer is also available for viewing by the general public on our external website, and available upon request. However, only 174,000 of those acres were officially designated, that portion of the total that does not involve school trust lands (letter from Commissioner to staff and stakeholders, 18 May 2015). Note that, at least for now, the HCVF acres on school trust lands will be managed as HCVF unless there are conflicts between objectives of school trust lands and individual management issues on a given HCVF site. A Project Team has been formed that will identify a process for reviewing and revising the HCV network after the MBS Program completes its first statewide survey. This process will include re-evaluating the HCVF shapefiles to identify their accuracy and alignment with stands possessing HCV's. HCV 4's were identified and mapped in 2016 through consultation with MN DNR, MN Department of Health (MDH), and Minnesota Department of Agriculture. HCV 4's utilize three existing shapefiles managed by DOH; Wellhead Protection Areas, Source Water Assessment Areas, and Drinking Water Supply Management Areas. Management recommendations for areas surrounding wellheads have been developed, including presence of spill kits, avoidance of high risk chemicals on the site. The department has a process for identifying HCV 6's through the contractual work of a state Archeologist who annually evaluates areas scheduled for management. The DNR is currently undergoing a revision of their HCV 1-3 classifications in advance of the new FSC-US forest management standard.
9.1.b In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts,	C	Primarily an internal process for HCV's 1-3: Much of the survey work conducted by Minnesota County Biological Survey is contracted to specialists. Multi-disciplinary teams were involved in regional HCVF designations. Many DNR employees are experts with different taxa and landscapes.

REQUIREMENT	C/NC	COMMENT/CAR
and local community members who may have knowledge of areas that meet the definition of HCVs.		Preliminary HCV 4's were identified and mapped in 2016 through consultation with MN DNR, MN Department of Health (MDH), and Minnesota Department of Agriculture. HCV 4's utilize three existing shapefiles managed by DOH; Wellhead Protection Areas, Source Water Assessment Areas, and Drinking Water Supply Management Areas. There are no known HCV 5's on the FMU, but through departmental and regional tribal teams and consultations performed with Minnesota's tribes on an annual basis, there is an ongoing dialogue for management and monitoring if any HCV 5's might be identified in the future. Consultation with communities occurs in a number of ways including public review of Section Forest Resource Management Plans (SFRMP) and Annual Stand Exam Lists (ASEL). The department consults with a state contracted archeologist for identifying possible HCV 6's, who annually evaluates areas scheduled for management.
9.1.c A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.	C	The DNR web site includes a fact sheet for HCVFs and the process of designation. An additional feature is that a map and a fact sheet for each HCVF also are available on the web site.
9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	C	
9.2.a The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate	C	The DNR has Informational Reports for each HCVF site developed by the interdisciplinary teams, including a list of HCVs in each site and initial management strategies. Interviews with staff confirmed that the HCVF process included consultation with other agencies and landowners where HCVs extended across ownerships.

REQUIREMENT	C/NC	COMMENT/CAR
options for the maintenance of their HCV attributes have been adopted.		
9.2.b On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.	C	A public review process has been conducted for the HCVF sites proposed for designation in 2014. HCVF Designations are open for public comment on the MN DNR website, particularly as the department reviews their HCV system in preparation for the upcoming FSC-US standard revision.
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.	C	

REQUIREMENT	C/NC	COMMENT/CAR
9.3.a The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.	C	Management guidelines for HCVs have been developed, available for review on the DNR website: https://www.dnr.state.mn.us/forestry/certification/hcvf.html The guidelines clearly take a precautionary approach for management, either avoidance of management or active management designed to maintain the designated features. For example, management guidelines for Goblin Fern require buffers around identified occurrences and reduced impact logging techniques in the surrounding stands. In contrast, Jack Pine Woodland (FDc23) management guidelines allow for harvesting and prescribed burning in order to maintain this disturbance dependent community.
9.3.b All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.	C	Field visits during the audit confirmed that management activities within HCVF areas followed the protective management prescriptions described in the HCVF plans.
9.3.c If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.	C	SFRMP documents lists plans for adjoining properties that are considered. For example, in prior audits the Savannah Hardwoods HCVF is shared with Aitkin County and is still managed in cooperation with the county. In 2014, regional HCVF teams developed methods to rank HCVF sites in each region for suitability for coordinating conservation efforts with adjacent landowners. The department maintains contact information on their website for landowners interested in working with the DNR to maintain HCV's where boundaries are shared.
9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the	C	

REQUIREMENT	C/NC	COMMENT/CAR
applicable conservation attributes.		
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.	C	Staff within EWR (Minnesota Biological Survey, Regional Nongame Wildlife Specialists, Regional Ecologists) participate in a range of monitoring activities related to High Conservation Value features. Examples include in the last year include: Ongoing monitoring of rare plants and native plant communities in HCVF sites in southeast Minnesota, including monitoring the state threatened plant fern-leaf false foxglove (Aureolaria pedicularia) in an HCVF site in Whitewater WMA. Annual census of rare orchid populations in Kittson, Mower, Norman, Pennington, Polk and Rock Counties in conjunction with TNC, USFWS, and NPS, including long-term monitoring of the federally-listed Western prairie fringed orchid and dwarf trout-lily. In 2021, MBS staff formed two teams of MNDNR botanists and EWR regional ecologists to identify and test protocols for monitoring one rare plant HCV (ram's head lady's-slipper orchid), and one native plant community HCV (central dry jack pine woodland, FDc23 NPC,). Before and during the 2021 field season, the two teams designed, field-tested, and refined draft study plans for each HCV. In 2021, an interdisciplinary team of staff and managers from the divisions of FOR, PAT, FAW, and EWR implemented a pilot project to develop an old growth forest monitoring program. The purpose of the old growth monitoring program is to monitor the status (amount and condition) of DNR's statewide old growth forest network and to provide this information to land managers and decision makers in a timely manner to support management, policy and land-use decision-making. They tested three sampling protocols. The Level 1 method used remote sensing data to detect coarse changes in forest canopy across the full statewide network of old growth sites. The Level 2 method applied a newly developed field-based rapid assessment to evaluate old growth forest condition at a total of 61 sites across regions 1-3. The Level 3 method applied DNR's existing, and more detailed, old growth field evaluations at a total of 8 sites across regions 1-3.
9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the	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.

REQUIREMENT	C/NC	COMMENT/CAR
measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.		

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 5 – Chain of Custody Indicators for FMEs Conformance Table

REQUIREMENT	C/NC/NA
1.1 The FME shall appoint a management representative as having overall responsibility and authority for the organization's compliance with all applicable requirements of this standard. **Evidence 1.1**: As confirmed via staff interviews, the Timber Program Supervisor has overall responsibility. Others involved are the Scaling Coordinator and Forest Certification Program Consultant.	C
1.2 A system shall be implemented to track and trace all products that are sold with an FSC Claim from the *forest of origin* to the *forest gate(s)*. When legally required, and for group and multiple FMU certificates, this system shall also be documented. *The forest of origin should be the smallest reportable manageable unit, such as a tax parcel. It shall never be larger than a Forest Management Unit (FMU).* *The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.*	C

REQUIREMENT	C/NC/NA
Evidence 1.2: As confirmed via staff interviews, timber sale administrators enter ticket numbers from each load harvested into the Timber Sale Module (TSM). The appraisal, notice of sale, and other permit-specific information is housed in the TSM. Load tickets are issued to the logger at the pre-sale meeting. A lockbox is installed at the landing, which is where the lockbox stub from each load ticket is placed. Each ticket includes a book, destination, and a lockbox stub; the destination sub is provided to the purchaser (i.e., mill). The lockbox stub includes the permit number, species, volume, and destination. The book stub stays in the ticket book, which is provided back to the sales administrator along with any leftover tickets at the conclusion of the permit. Mills provides the MN DNR with scale reports, generally on a daily basis. Batches of scale reports are uploaded to TSM for the permit. Lockbox stubs, consumer stubs (i.e., destination stubs for mills that have a Consumer Scale Agreement with the MN DNR), and scale reports are reconciled.	
1.3 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years. **Evidence 1.3**: Confirmed via review of procedures and sampled documents, as well as interviews with staff.	C
1.4 The FME shall define its *forest gate(s)* **Lump-sum sale/ Per Unit/ Pre-Paid Agreement** *A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for before harvesting begins. Similar to a per-unit sale.*	C
1.5 The FME shall have sufficient control over its *forest gate(s)* to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership. **Evidence 1.4/1.5**: Timber is sold as Consumer Scaled (i.e., off-site) and Sold on Appraised Volume (i.e., lump-sum). In both cases, the forest gate occurs only after three conditions have been met: (1) all conditions of the permit have been met; (2) payment has been received by DNR; and (3) permit is closed.	C
1.6 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the *forest gate(s)* without conforming to applicable chain of custody requirements. *NOTE: This does not apply to log cutting or de-barking units, small portable sawmills, on-site processing of chips/biomass or primary processing of Non-Timber Forest Products (NTFPs) under the FME's control (e.g., latex, rattan, maple syrup, etc.) originating from the FMU under evaluation.*	C
Evidence 1.6: Occasionally, permit holders will produce clean chips for sale as part of an operation. For both biomass and when merchandising a blend of species, the stand is reappraised since it would involve combining multiple species in each load. In all cases, the same COC procedures as for logs are followed.	

REQUIREMENT	C/NC/NA
1.7 The FME has supported transaction verification conducted by SCS and Assurance Services International (ASI) by providing samples of FSC transaction data as requested by SCS. *NOTE: Pricing information is not within the scope of transaction verification data disclosure.*	NA, no verification requested
1.8 The FME shall support fiber testing by surrendering samples and specimens of materials and information about species composition and the location where the sample originated for verification, as requested by its certification body, ASI or FSC. **Evidence 1.7/1.8**: The MN DNR has not been requested to support transaction verification.	NA, no verification requested
2.1. Products from the certified forest area shall be identifiable as certified at the *forest gate(s)*. **Evidence 2.1**: All loads leave the FMU with load tickets, providing an audit trail for all material leaving the FMUs. This ensures that such material is documented as being 100% FSC certified. Load tickets include a website link at which the current FSC code and claim are posted. Auditor reviewed a sample of completed load tickets. Additionally, the permit number is painted on each load.	C
2.2 Information about all products sold shall be compiled and documented for all FMUs in the scope of certification, including: 1) Common and scientific species name; 2) Product name or description; 3) Volume (or quantity) of product; 4) Information to trace the material to the source of origin harvest block; 5) Harvest date; 6) If basic processing activities take place in the forest, the date and volume/quantity produced; and 7) Whether or not the material was sold with an FSC Claim. **Evidence 2.2**: Items 1) through 7) are documented in the TSM database used to track volumes, species, and other harvest-related information.	C
2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information: a) name and contact details of the FME; b) information to identify the customer, such as their name and address; c) date when the document was issued; d) product name or description, including common and scientific species name(s); e) quantity of products sold; f) the FME's FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code; g) clear indication of the FSC claim for each product item or the total products as follows: i. the claim "FSC 100%" for products from FSC 100% product groups; or ii. the claim "FSC Controlled Wood" for products from FSC Controlled Wood product groups.	C

REQUIREMENT	C/NC/NA
2.4 If the sales documentation issued by the FME is not included with the shipment of the product and this information is relevant for the customer to identify the product as being FSC certified, the related delivery documentation has included the same information as required in indicator 2.3 and a reference linking it to the sales documentation. **Note: 2.3 and 2.4 are based on FSC-STD-40-004 V3-0 Clauses 5.1 and 5.3** **Evidence 2.3/2.4**: Between the permit and load tickets, all required information is provided. Load tickets correspond to permits, providing an auditable stump-to-gate paper trail.	NA, delivery documentation not required or FME is not responsible for issuing delivery documentation
2.5 If the FME is unable to include the FSC claim and/or certificate code in sales or delivery documents, the required information has been provided to the customer through supplementary documentation (e.g. supplementary letters). In this case, the FME has obtained permission from SCS to implement supplementary documentation in accordance with the following criteria: a. there shall exist clear information linking the supplementary documentation to the sales or delivery documents; b. there is no risk that the customer will misinterpret which products are or are not FSC certified in the supplementary documentation; and c. where the sales documents contain multiple products with different FSC claims, each product shall be cross-referenced to the associated FSC claim provided in the supplementary documentation. **Evidence 2.5**: As described under the evidence for 2.3/2.4, between the permit and load tickets, all required information is provided. Load tickets correspond to permits, providing an auditable stump-to-gate paper trail.	NA, all information included per 2.3 and/or 2.4
2.6 The FME may identify products exclusively made of input materials from small or community producers by adding the following claim to sales documents: “From small or community forest producers.” This claim can be passed on along the supply chain by certificate holders. *A forest management unit (FMU) or group of FMUs that meet(s) the small and low-intensity managed forest eligibility criteria (FSC-STD-1-003a) and addenda. A community FMU must comply with the tenure and management criteria defined in FSC-STD-40-004.*	NA, not a small or community producer; or does not wish to pass along this claim
3.1 The FME shall adhere to relevant trademark use requirements of FSC-STD-50-001 described in the *SCS Trademark Annex for FMEs*. **Evidence 3.1**: Refer to evidence and findings cited in applicable trademark checklist(s) cited below.	C
NA – FME outsources low-risk activities such as transport and harvesting, as confirmed via interviews, sales documentation, and field observation.	
Evidence 4.1/4.2: Per above, this is NA. The MN DNR outsources low-risk activities such as transport and harvesting, as confirmed via interviews, sales documentation, and field observation.	NA
5.1 All relevant FME staff and outsourcers shall be trained in the FME’s COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME’s COC control system.	C

REQUIREMENT	C/NC/NA
5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings or communications, the intended frequency of COC training (e.g., training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc.). **Evidence 5.1/5.2**: Procedures for the COC system are described during the pre-sale meeting with permit holder, and ongoing administration of the permit through in-person visits helps to ensure conformance. In addition, the MN DNR has an appraiser training course ("scaling school") for new foresters. A review of a sample of training records verified that the MN DNR maintains up-to-date records of its COC training.	C

Appendix 6 – Trademark Standard Conformance Table

General Requirements for Use of the FSC Trademarks:
(FSC "checkmark-and-tree" logo, initials "FSC," and/or name "Forest Stewardship Council")
☒ Sample reviewed. Rationale that sample choice is sufficient to confirm requirements are met:
No new trademark uses since 2023. Most publicly facing use reviewed.

Trademark Standard Requirements	**C/NC/NA**
1.2 Trademark License Agreement and valid certificate In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate. *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.* **Evidence 1.2**: Maintained on file by SCS Main Office.	Maintained on file by SCS Main Office
1.6 Product Group List The products intended to be labeled or promoted as FSC certified have been included in the organization's certified product group list. **Evidence 1.6**: ☒ Refer to Product Groups List in Public Summary Report;	C
1.3 Trademark License Code 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.	C
1.4 Trademark Symbol The FSC logo and the 'Forests For All Forever' marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered. For use in a country where the trademark is not yet registered, use of the symbol ™ is recommended. The Trademark Registration List document is available in the FSC trade-mark portal and marketing toolkit. The symbol ® shall also be added to 'FSC' and 'Forest Steward-ship Council' at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure). *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.*	C
2.1 Restrictions on using FSC trademarks The organization **has not used** the FSC trademarks in the following ways: 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;	C

Trademark Standard Requirements	**C/NC/NA**
d) in product brand or company names, such as 'FSC Golden Timber' or website domain names; e) in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements.	
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) **Evidence 1.3, 1.4, 2.1, and 2.2**: ☒ Refer to Trademark uses reviewed above;	NA, no translations
Sections 8 and 9 Graphic Rules The organization has only used FSC logos that conform to the standard requirements governing: • 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).	C
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.)	C
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. **Evidence Graphic Rules, 1.5, and 4.6**: ☒ Refer to Trademark uses reviewed above;	NA, trademarks no used for segregation marks/
2. On-Product Use of FSC Trademarks ☒ NA, no use of on-product trademarks (*on-product checklist may be deleted*)	NA
3. Promotional Use of FSC Trademarks ☐ NA, no use of promotional trademarks (*promotional checklist may be deleted*)	NA
6.1 Catalogues, Brochures, and Websites When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply: • It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc.	C

Trademark Standard Requirements	**C/NC/NA**
• 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.	
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". *NOTE: Use of the FSC claim and certificate code on the invoices does not qualify as FSC trademark use.*	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.	NA, not labeling promotional items
6.5 Trade Fairs When the FSC trademarks are used for promotion at trade fairs, the organization has: a) clearly marked which products are FSC certified, or b) add a visible disclaimer stating "Ask for our FSC®-certified products" or similar if no FSC-certified products are displayed. *NOTE: Use of text to describe the FSC certification of the organization does not require a disclaimer.*	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."	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.	C
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######)".	C

Trademark Standard Requirements	C/NC/NA
7.4 Promotion with CB Logo FSC certified products have not been promoted using only the SCS Kingfisher and/or SCS Global Services logo. **Evidence 6.1-6.3, 6.5-6.7, 7.1-7.4**: ☒ Refer to Trademark uses reviewed above;	C

Annex B, Additional trademark rules for group FM certificate holders

NA, not a group FM certificate or group does not use FSC

Appendix 7 – Group Management Program

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

Appendix 8 – Additional Checklists

Include here additional checklists which may be applicable to this evaluation for example, Intact Forest Landscapes, and ESRA checklists.

No additional checklists, so this appendix is not applicable.