



**Bureau Veritas Certification  
North America, Inc.  
SFI Forest Management Audit Report**

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PQC Code	
Contract Number	795841

Certification Audit:		Re-Certification Audit:		Surveillance Audit:	#4	Scope extension audit:	
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Audit Summary
<p align="center"><b>Introduction</b></p> <p>This was a Surveillance #4 audit of the State of Minnesota Department of Natural Resources. The DNR manages approximately 5 million acres of land on behalf of the state including school trust lands, state aquatic areas and state wildlife management areas. The audit was conducted by a team of: Terry Cundy (Lead), Sarah Bros, Juliana Colpas and Jim Colla during December 1-4, 2025. Every member of the audit team is an experienced auditor with many years of auditing experience.</p> <p align="center"><b>Audit Scope, Objectives and Process</b></p> <p>The scope of the audit is; Forest Management on Minnesota DNR managed forestry lands, fisheries lands in Lake County, Land Utilization Project (LUP) lands, and wildlife lands except for the Prairie Province, including SFI 2022 Rules and Standards, Section 2- Forest Management Standard Objectives 1-17. Scientific and Natural Areas (SNAs) and State Parks are excluded. Determine conformance of the organization’s forestry program against the SFI 2022 Forest Management Standard. This surveillance audit was evaluated against applicable SFI standards and related normative documents. Standard protocols and forms as found in the Bureau Veritas Certification BMS and SFI Auditor Handbook will be applied throughout the verification. The audit focused on SFI criteria: 1.1, 2.1-2.3, 3.1, 4.2, 5.1, 6.1, 7.1, 8.1-8.2, obj 10, 11,13, 15, 16, 17. The audit team reviewed documents and records, interviewed staff and inspected field operations.</p>

## Audit Plan

**Date: Monday 1 December 2025**

Time	Activity	BVC Rep.	Company Rep.
8:30 AM	Opening Meeting - audit scope & approach, non-disclosure, appeals	Bros, Cundy Team	James & designated staff
9:00 AM	Document and record review of selected criteria and indicators; stakeholder consultation	Team	same
4:00 PM	Daily debrief	same	same

**Date: Tuesday 2 December 2025**

Time	Activity	BVC Rep.	Company Rep.
8:00 AM	Site visits – three teams	Team	James & designated staff
3:45 PM	Daily debrief	Bros, Cundy	same

**Date: Wednesday 3 December 2025**

Time	Activity	BVC Rep.	Company Rep.
8:00 AM	Site visits – three teams	Team	James & designated staff
3:45 PM	Daily debrief	Bros, Cundy	same

**Date: Thursday 4 December 2025**

Time	Activity	BVC Rep.	Company Rep.
8:00 AM	Follow up document and record review of selected criteria and indicators, prepare audit findings	Team	James & designated staff
3:30 PM	Closing meeting – audit findings, NCs, confidentiality, appeals, date of next audit		same
4:00 PM	End audit		

Total audit field days: 14

**Post off-site audit activities:**

Report writing (days): 3

Prep/Stakeholder (days): 1

## Company Information

The DNR manages a wide portfolio of lands on behalf of the state of Minnesota. This audit focused exclusively on forest lands that include state school trust lands, wildlife management areas and aquatic management areas. Forest lands are largely found in the northern half of the state. DNR sells standing timber through an auction process and paid-as-cut model. Following harvest, DNR is responsible for re-establishing the forest which includes both natural regeneration (typical in hardwoods) and planting (conifers).

## Audit Results

Areas audited were the Backus, Aitkin and Deer River units. A variety of field sites were visited including planned, active and completed site. Approximately 30 sites were visited over two days that included planned and spontaneous visits.

Objective 1-Forest Management Planning: The DNR uses an external contractor to complete their long-term harvest level assessment which includes providing a stand list for the first 10 years of the planning horizon. The contractor (Mason, Bruce and Gerard) are widely respected and utilized by a

wide range of clients in the U.S. including both public and private land managers. MBG utilized Woodstock and Stanley software to complete the planning exercise. Actual harvest levels for the past 10 years are well below the long-term harvest level. An OFI was identified under 1.1.4 to complete and publicly publish the narrative plans which put harvest levels in context with other resources of concern.

**Objective 2-Forest Health and Productivity:** The DNR maintains a comprehensive set of guidance documents and policies to address forest health and productivity. This includes an Integrated Pest Management program. Adequate reforestation utilizing primarily natural regeneration with isolated stands of conifers requiring artificial regeneration was observed. Organization has a consistent method for monitoring regeneration and maintaining records within Management Plans and GIS system. Field site observations confirmed protection of soils and maintenance of healthy forests.

**Objective 3-Protection and Maintenance of Water Resources:** The DNR maintains an up-to-date GIS layer of rivers, streams and other riparian features. Buffers and protection areas were identified on the ground with monitoring during harvesting operations confirmed. No evidence of BMP violations was observed on field sites. Qualified Logger Training requirements are documented within all written contracts and harvest permits.

**Objective 4-Conservation of Biological Diversity:** The DNR houses both Forestry and Ecological and Water Resources divisions. These divisions work together on forest lands to address conservation of biological diversity. During this audit the team did discover there is a lack of common understanding between the divisions related to cooperation on state trust lands. This is captured in an OFI under 4.2.1. An additional OFI was issued under 4.3.1. regarding some staff concerns on old growth identification process.

**Objective 5-Management of Visual Quality and Recreational Benefits:** The DNR uses state of Minnesota Forest Management Guidelines to address visual quality. Visual quality is addressed in site level harvest planning. A notable practice was issued under 5.4.1 regarding hunting trails.

**Objective 6-Protection of Special Sites:** DNR is the keeper of the state's Natural Heritage program. Forestry and Ecological and Water Resources staff cooperate to address special sites as needed on a site-by-site basis involving forest management activities.

**Objective 7-Efficient Use of Fiber Resources:** Following the Minnesota Forest Management Guidelines, the DNR balances utilization, site productivity and fire hazard on a site-by-site basis as part of forest harvest planning and implementation. This includes site inspections by DNR foresters.

**Objective 8: Recognize and Respect Indigenous People's Rights:** The DNR has a program dedicated to tribal cooperation consistent with state laws and statutes that is staffed by two tribal members. Tribal input is solicited as appropriate, including during development of the Minnesota Forest Management Guidelines.

**Objective 9-Climate Smart Forestry:** Not audited in 2025

**Objective 10-Fire Resilience and Awareness:** The MN DNR is actively involved with Regional Cooperatives and Federal Agencies for the mitigation of wildfire impacts. Reforestation examples were addressed on areas impacted by previous wildfires. On-going monitoring and reforestation efforts were confirmed during audit. Minnesota Department of Natural Resources has significant resources available for education and outreach for wildfire prevention and risk. The DNR has begun a program to look at prescribed fire as a timber stand improvement treatment.

Objective 11-Legal and Regulatory Compliance: As a public land management agency the DNR is bound by a wide variety of state laws, rules and regulations as well as the state constitution. Oversight is provided by the state legislature and executive branches (as well as the public) and enforced through the judiciary. One OFI was issued under 11.1.3 for an on-going issue between the state and federal government regarding USFWS contracts/grants to the state.

Objective 12-Forestry Research, Science and Technology: Not audited in 2025

Objective 13-Training and Education: The DNR is an active member of the SFI State Implementation Committee and DNR staff currently chair the Committee. DNR requires that all loggers on state lands be Qualified Logging Professionals.

Objective 14-Community Involvement and Landowner Outreach: Not audited in 2025

Objective 15: Public Land Management Responsibilities: The DNR operates under a comprehensive set of laws and statutes requiring transparency and communication regarding forest management planning, implementation and forest certification. The DNR maintains a public web site where information regarding DNR activities is readily available. The web site includes the ability to receive complaints or inquiries from interested parties.

Objective 16-Communications and Public Reporting: The DNR is in conformance with all SFI requirements regarding annual reporting and publication of audit results.

Objective 17-Management Review and Continual Improvement: The DNR has an internal audit program in addition to external audits that feed their Management Review and Continual Improvement processes. Management Reviews are documented in memos.

## Findings

### Previous non-conformances:

One non-conformance issued in 2024. Procedures were not properly implemented for Permit #X018268 based on interviews with personnel and review of Direction Memo #2022-1. Contact request from Ecological and Water Resources were documented on the SEL. Interviews confirmed a discussion was conducted between the groups but not closed by Forestry personnel as directed within the Direction Memo Section C. The sale prescription was implemented which resulted in an unexpected result by EWR personnel.

During this audit interviews with EWR personnel indicated no issues communication and documentation between EWR and Forestry staff. The process for dispute resolution was understood by both staffs, with both stating that it is used very rarely.

### Non-conformances:

One non-conformance.

SFI 2022 Section 4, 5.1: Minor CAR. The DNR is not clearly indicating the claim on documents conveying ownership and documents accompanying the logs from site to mill. Greater detail is included in SF02 Non-conformity Report - Minnesota DNR Colla.doc which is included as part of this report.

### Opportunities for Improvement:

Five OFIs were issued during this audit.

1. 1.1.4 – The forest management planning harvest level analysis has been completed and is well documented. However, the narrative plan reports which put these harvest levels in context with other resources of concern are not yet published.
2. 4.2.1 – DNR Leadership has issued a memo regarding cooperation of EWR and Forestry staffs and prioritizing efforts. A lack of common understanding of the details and spirit of this memo became evident.
3. 4.3.1 – DNR has a process for identifying and evaluating candidates for old growth designation. Some staff expressed some concern on this process. This is flagged for further review at the next audit.
4. 11.1.3 – There is an on-going discussion between the state of MN and the federal government regarding compliance with terms of contracts/grants between the state and USFWS. The audit team is confident that negotiations or the state/federal judicial process will resolve this issue. Nonetheless, this issue should be better understood during the next audit.

**Notable Practices:**

5.4. Observed constructed and signed Hunter walking trails. Signage includes map of trails across MN DNR managed lands using Avenza maps. Designed for hunters but trails are used year-round so MN DNR installed Invasive species signs with instructions to clean off boots (boot cleaner installed) and clothing before entering and leaving the trails. Auditors felt this was worthy of a **NP** as they have not seen it done elsewhere.

**Logo/label use:**

Minnesota DNR does not use the SFI logo or label.

**SFI reporting:**

All SFI reporting requirements were met since the previous audit.

### **Conclusions**

The audit was concluded with a closing meeting on 4 December 2025. The consensus of the audit team was that the DNR should receive continued certification. As state above, one minor Corrective Action is noted which should be addressed prior to the next audit. Documentation of corrective actions completed by DNR should be submitted to the Lead Auditor, Terry Cundy. The next audit team should dedicate some time to the OFIs identified above during the next audit.

### **Follow-up**

*Add a follow-up statement to this section when non-conformances are closed to indicate the company is now ready to proceed to or continue certification. Delete this section if there were no non-conformances.*

**SEE SF61(s) FOR AUDIT NOTES**

Summary of Audit Findings:									
Audit Date(s):		From: 1 December 2025				To: 4 December 2025			
Number of SF02's Raised:			Major:			Minor:		1	
Is a follow up visit required:		Yes	No	X	Date(s) of follow up visit:				
Follow-up visit remarks:									
Team Leader Recommendation:									
Corrective Action Plan(s) Accepted		Yes	No	N/A	Date:				
Proceed to/Continue Certification		Yes	X	No	N/A	Date:	4 December 2025		
All NCR's Closed		Yes	No	N/A	Date:				
Standard audit conducted against:									
1)	SFI 2022 Forest Management Standard		3)						
2)			4)						
Team Leader (1): Terry Cundy			Team Members (2,3,4...)						
			2) Sara Bros						
			3) Juliana Colpas						
			4) Jim Colla						
			5)						
Scope of Supply: (scope statement must be verified and appear in the space below)									
<i>From the CE: Forest Management on Minnesota DNR managed forestry lands, fisheries lands in Lake County, Land Utilization Project (LUP) lands, and wildlife lands except for the Prairie Province, including SFI 2022 Rules and Standards, Section 2- Forest Management Standard Objectives 1-17. Scientific and Natural Areas (SNAs) and State Parks are excluded.</i>									
Accreditation's		ANAB							
Number of Certificates		1							
Proposed Date for Next Audit Event									
Date	October 2026								
Audit Report Distribution									
MN-DNR : Adam James – adam.james@state.mn.us									
BVC: Lynda Lawler – lynda.lawler@bureauveritas.com									

Clause	Audit Report
Opening Meeting	<ul style="list-style-type: none"> <li>➤ Introductions</li> <li>➤ Scope of the audit</li> <li>➤ Audit schedule/plan</li> <li>➤ Nonconformance types – Major / Minor</li> <li>➤ Review of previous nonconformances - 0.</li> <li>➤ Process approach to auditing and audit sampling</li> <li>➤ Confidentiality agreement</li> <li>➤ Termination of the audit</li> <li>➤ Appeals process</li> <li>➤ Closing meeting timing</li> </ul> <p>Sarah Strommen  Barb Naramore  Shannon Lotthammer  Bob Meier  Jess Richards  Clarissa Spicer  Wes Belanger  Adam Munstenteiger  Lindsey Shartell  Blane Klemek  Darrell Schindler  Nathan Kestner  Patty Thielen  Kelly Straka  Katie Smith  Doug Tillma  Jesse Roberts  Dave Trauba  Heidi Wolf  Andrew Arends  Aaron VandeLinde  Adam James  Lacy Levine  Nick Jensen</p>
Closing Meeting	<p>Participants:</p> <p>Discussions:</p> <ul style="list-style-type: none"> <li>➤ Introductions and appreciation for selecting Bureau Veritas Certification.</li> <li>➤ Review of audit process - process approach and sampling.</li> <li>➤ Review of OFIs and System Strengths</li> <li>➤ Nonconformances - 1</li> <li>➤ Date for next audit.</li> <li>➤ Reporting protocol and timing</li> </ul>

	<p>Sarah Strommen Barb Naramore Shannon Lotthammer Bob Meier Jess Richards Clarissa Spicer Wes Belanger Adam Munstenteiger Lindsey Shartell Blane Klemek Darrell Schindler Nathan Kestner Patty Thielen Kelly Straka Katie Smith Doug Tillma Jesse Roberts Dave Trauba Heidi Wolf Andrew Arends Aaron VandeLinde Adam James Lacy Levine Nick Jensen</p>
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## SF02 NON-CONFORMITY REPORT

### Wood Schemes

<b>Date</b>	<b>Client Name and Site:</b>	<b>SF02#:</b>	
Non-conformity Observed During:			
Process:			
Standard / Reference Document:			
Clause:			
<b>REQUIREMENT OF AUDITED STANDARD:</b>			
<b>STATEMENT OF NON-CONFORMITY:</b>			
<b>OBJECTIVE EVIDENCE FOR RAISING NON-CONFORMITY AND JUSTIFICATION OF THE GRADE</b>			
<b>Grade</b>	<b>Lead Auditor</b>	<b>Auditor raising NCR</b>	<b>Client Representative</b>
<b>To be Completed Before:</b>			
<b>ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION *</b>			
Correction:			
Root Cause:			
Corrective Action:			
<b>Implementation of CA</b>	<b>Date of Completion*</b>		
	<b>Client Representative*</b>		

<b>CLEARANCE REPORT</b>				
<b>Validation of Corrective Action plan</b>				
<b>Corrective Action Accepted</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>Auditor:</b>				<b>Date:</b>
<b>Verification of implementation</b>				
<b>Auditor:</b>				<b>Date:</b>