

## Summary of the 2020 Independent Forest Audit Findings

In 2020, three Independent Forest Audits (IFAs) were completed using the 2020 Independent Forest Audit Process and Protocol (IFAPP). Changes to the 2020 IFAPP over the 2019 IFAPP included:

- Updating Appendix A to fully incorporate the provisions of the 2017 Forest Management Planning Manual (FMPM), the Forest Information Manual (FIM), and the Forest Operations and Silvicultural Manual (FOSM),
- Providing First Nation and Métis communities the same opportunity as the Local Citizens Committee (LCC) to receive a presentation of the findings,
- Registration to ISO 14001 was deemed to satisfy Principle 5 requirements,
- Providing greater clarity regarding who is responsible for reviewing the Trend Analysis Report (TAR) and when it is required.
- Providing greater clarity regarding action plan development and LCC presentation, and
- Incorporating numerous corrections, clarifications, edits and updates throughout the entire IFAPP.

The three audits that were conducted in 2020 are:

- English River Forest – managed by Resolute FP Canada Inc., under Sustainable Forest Licence (SFL) # 542454.
- Red Lake Forest – managed by the Red Lake Forest Management Company Ltd. under Sustainable Forest Licence (SFL) #542548.
- Wabigoon Forest - managed by Domtar Inc., under Sustainable Forest Licence (SFL) #541953.

On all three of the audits, **the auditors found that the management was generally in compliance with the legislation, regulations, and policies that were in effect during the term covered by the audit**, and the Forests were being managed in compliance with the terms and conditions of their Sustainable Forest Licences. For the Red Lake Forest, the auditors also identified critical exceptions related to satisfactorily addressing the recommendations from the previous audit related to the quality of water crossings, the quality of aggregate pit management, and working with Ministry of Natural Resources and Forestry (MNRF) to improve compliance consistency. One best practice was issued to the English River Forest and is discussed below.

Table 1 identifies a number of findings in all three audits. Detailed action plans to address the findings presented in the audit reports are being prepared and will be posted on the Ontario government website alongside the audit reports once the reports are accepted by the minister or his delegated authority.

Table 1. Summary of the audit findings and best practices for all three audits with respect to the eight IFA Principles.

<b>IFA Principles</b>	<b># Findings</b>	<b>Percentage %*</b>	<b>Best Practice</b>
1. Commitment	0	0	0
2. Public consultation and Aboriginal involvement	0	0	1
3. Forest Management Planning	5	19	0
4. Plan assessment and implementation	11	41	0
5. System support	1	4	0
6. Monitoring	6	22	0
7. Achievement of management objectives and forest sustainability	0	0	0
8. Contractual Obligations	4	15	
<b>Total</b>	<b>27</b>	<b>100</b>	<b>1</b>

\*rounded to the nearest whole number.

### **Common Findings**

While most of the findings from the 2020 audits were unique to the Forest being audited, there were a few findings that were common to two or more reports. These common findings have been grouped below by IFA principles:

#### **Principle 3 - Forest Management Planning**

Two audits (English River & Wabigoon Forests) identified that the production process for the development of the Enhanced Forest Resource Inventory has systemic problems.

#### **Principle 4 - Plan Assessment and Implementation**

All three audits (English River, Red Lake & Wabigoon Forests) identified that the operational standards for forest aggregate pits identified in their forest management plans were not consistently met.

Two audits (English River & Wabigoon Forests) identified problems with the variable efficacy of mechanical site preparation by passive disc trenching.

#### **Principle 6 – Monitoring**

All three audits (English River, Red Lake & Wabigoon Forests) identified problems with the compliance program

### **Management Unit Specific Findings**

#### ***English River Forest***

Concluding Statement:

The audit team concludes that the management of the English River Forest was generally in compliance with the legislation, regulations and policies that were in effect during the term covered by the audit, and the Forest was managed in compliance with the terms and conditions of the Sustainable Forest Licence # 542454 held by Resolute FP Canada Inc. The forest is being managed consistently with the principles of sustainable forest management, as assessed through the Independent Forest Audit Process and Protocol.

#### Findings:

- 1) The production process for the development of the Enhanced Forest Resource Inventory has systemic problems.
- 2) Slash-pile burn program objectives were not consistently met.
- 3) The operational standards for forestry aggregate pits identified in the 2019 English River Forest Management Plan were not consistently met.
- 4) Inconsistent silviculture planning, delivery and monitoring resulted in the variable efficacy of the mechanical site preparation and aerial herbicide treatments across sites and operating years.
- 5) District Ministry of Natural Resources and Forestry and the Resolute FP Forest Operation Information Program reports were not submitted in accordance with the timelines identified in the English River Forest Management Plan and the Forest Compliance Handbook.
- 6) In some instances, the District Ministry of Natural Resources and Forestry and Resolute FP compliance staff did not follow the documentation requirements of the operational issue process identified in the 10 Year Compliance Strategy and the 10 Year Compliance Plan.

#### Best Practice

- 1) The Local Citizens Advisory Committee provided a formal process for its membership to make other committee members aware of the interests and concerns of individual members and/or the interest group they represent vis a vis the management of the English River Forest.

#### ***Red Lake Forest***

#### Concluding Statement:

The audit team concludes that with the critical exceptions noted below, management of the Red Lake Forest was generally in compliance with the legislation, regulations and policies that were in effect during the term covered by the audit, and the Forest was managed in compliance with the terms and conditions of the Sustainable Forest Licence # 542548 held by Red Lake Forest Management Company Ltd. The forest is being managed consistently with the principles of sustainable forest management as assessed through the Independent Forest Audit Process and Protocol. The critical exceptions related to satisfactorily addressing recommendations from previous audits related to the quality of water crossings (Finding # 6), the quality of aggregate

pit management (Finding # 9), and working with MNRF to improve compliance consistency (Finding # 8).

Findings:

- 1) MNRF Red Lake did not meet all its obligations related to overseeing and auditing operational aspects of forest management.
- 2) The Company did not meet its requirements to notify MNRF regarding the status of operations.
- 3) The Company is not planning/ listing the appropriate water crossings in Table AWS-1 or listing decommissioning in Table AWS-2.
- 4) MNRF's review of proposed amendments to the Forest Management Plan have not been completed and approved in a timely manner.
- 5) The Company did not meet its requirements in the Annual Work Schedule compliance plans to mark the boundaries of harvest blocks.
- 6) Installations of several water crossings did not meet safety and environmental standards as identified in the Forest Management Plan. Recommendations to address this issue as identified in the 2015 and 2010 Independent Forest Audits have not been addressed. The MNRF/Department of Fisheries and Oceans Protocol for the Review and Approval of Water Crossings was not applied as intended.
- 7) Red Lake District MNRF did not meet its obligations associated with the development of comprehensive district compliance plans or the achievement of the compliance targets identified in the plans.
- 8) Red Lake MNRF District staff and industry staff do not have a shared understanding of what constitutes operational compliance and have not used mechanisms to improve consistency.
- 9) Aggregate pits do not meet the operational standards for forestry aggregate pits as identified in the Forest Management Planning Manual.
- 10) The requirements (as identified in the 2020 IFAPP Procedure 8.1.9) of the Action Plan Status Report related to the 2015 IFA Recommendation # 19) were not addressed.
- 11) The use of the rate of non-compliance as the sole measure of success in achieving objectives related to maintenance of forest values and healthy ecosystems does not provide a sufficient means by which to assess sustainability or the quality of forest management. as required in the Forest Management Planning Manual (Section 1.2.5.1).
- 12) There is insufficient evidence that local First Nations received sufficient benefits from forest management planning on the RLF to conclude that Section 20 of the SFL was met during the audit period.

13) The MNRF does not readily provide important financial information regarding the payment of Crown dues for timber harvested to the SFL Manager.

14) The requirements (as identified in the 2020 IFAPP Procedure 8.1.9) of the Action Plan Status Report related to the 2015 IFA Recommendation #21 have not been addressed.

### ***Wabigoon Forest***

#### **Concluding Statement:**

The audit team concludes that the management of the Wabigoon Forest was generally in compliance with the legislation, regulations and policies that were in effect during the term covered by the audit, and the Forest was managed in compliance with the terms and conditions of the Sustainable Forest Licence held by Domtar Inc. # 541953. The forest is being managed consistently with the principles of sustainable forest management, as assessed through the Independent Forest Audit Process and Protocol.

#### **Findings:**

- 1) The production process for the development of the Enhanced Forest Resource Inventory had systemic problems.
- 2) The operational standards for forestry aggregate pits identified in the 2019 Forest Management Plan were not consistently met.
- 3) On some competitive sites the aerial chemical tending program achieved variable success.
- 4) Passive disc trenching often failed to create suitable site conditions for renewal on some harvested sites and within chipper debris pads.
- 5) A significant percentage of Ministry of Natural Resources and Forestry and the Domtar Inc. compliance inspection reports were not submitted in accordance with the timelines identified in the Forest Management Plan and the Forest Compliance Handbook.
- 6) Domtar's monitoring and reporting programs were insufficient to evaluate the effectiveness of some forest operations.
- 7) The implementation of the 2015 Independent Forest Audit Action Plan did not fully resolve issues associated with the production, review and approval of forest management documents and products.