

Summary of the 2022 Independent Forest Audits

Four (4) Independent Forest Audits (IFAs) were completed in 2022 using the 2022 Independent Forest Audit Process and Protocol (IFAPP).

The four (4) 2022 audits are:

- Dog River-Matawin Forest – managed by Resolute FP Canada Inc. under Sustainable Forest Licence # 542459.
- Mazinaw-Lanark Forest – managed by Mazinaw-Lanark Forest Inc. under Sustainable Forest Licence #542621.
- Pic Forest – managed by Nawiinginokiima Forest Management Corporation (a Crown Corporation), under Sustainable Forest License # 553395.
- Trout Lake Forest – managed by Domtar Inc., under Sustainable Forest License # 542461.

There were no additional requirements in the 2022 IFAPP over the 2021 IFAPP, but there were changes to improve the clarity of the wording, updates to responsibilities and/or alignment of responsibilities with the Forest Management Planning Manual (FMPM) and Freedom of Information and Protection of Privacy Act (FIPAA) requirements. Examples of changes include:

- Consistency in definitions (e.g., sustainable forest licensee as used in FMPM) and evolution in ROD roles (e.g., with no status report requirement).
- Clarified language from “MNR Forest Industry Division” to “overdue account balance information in discussion with MNR Forest Industry Division” and added ROD/IB responsibility in coordinating obtaining related information as needed.
- Consistency with current practice • Changed Silviculture Effectiveness Monitoring to Silviculture Monitoring to encompass SEM and RAP.
- Added establishment assessments - not only FTG but also establishment assessment.
- Approval of MNR and Forestry Futures Committee is required prior to any changes to the schedule.
- Added an e.g., for the use of helicopter to clarify it may be most cost-efficient means for assessing FTG.
- Added wording related to succinctness of text to address non-conformities without repeating information.
- Added wording to address AODA posting needs for Ontario.ca
- Connected reporting deadline and process requirements from text to template to ensure the actions are reported as completed by the deadline date indicated by RD Regional Director approved action plan.
- Clarified what is mandatory in Appendix A - Procedures outlined in Appendix A are mandatory unless specified as optional.

On three (3) of the four (4) audits (Dog River-Matawin, Mazinaw-Lanark and Trout Lake Forests), **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.

On one (1) of the four (4) audits (Pic Forest), the auditors found that the management, with the critical exceptions noted below, 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.

Critical Exceptions identified are:

- Due to poor record keeping it was not possible to assess whether forest management planning was conducted in an open, consultive fashion with First Nation and Metis communities.
- There is lack of guidance by the Ministry of Natural Resources and Forestry with respect to Caribou management, and
- There is a lack of reporting on objective achievement as it pertains to the final year of the 2007 Big Pic Forest Management Plan.

As shown in Table 1 below, the audits identified a number of findings in all four (4) audits. All four (4) reports have been accepted by the Ministry. 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.

Table 1. Summary of the 2022 Audit Findings and Best Practices for all four audits with respect to the eight IFA Principles

IFA Principles	# Findings	Percentage %*	Best Practice
1 Commitment	0	0	
2 Public consultation and Aboriginal involvement	2	6	
3 Forest Management Planning	4	13	1
4 Plan assessment and implementation	8	25	1
5 System support	1	3	
6 Monitoring	13	41	
7 Achievement of management objectives and forest sustainability	1	3	
8 Contractual Obligations	3	9	
Total	32	100	2

*rounded to the nearest whole number.

The four (4) audits were awarded at a total cost of \$301,294.16 (including HST), or on average \$75,323.54 (as compared to 2021 which averaged out to \$57,033.72 (including HST), for four (4) audits. The increase in the average cost per audit may be attributed to the complexities of these particular four forests, and the increased scope of the audits which averaged 6.5 years compared to 5.5 years in 2021.

Common Findings

While most of the findings from the 2022 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 (Dog River-Matawin and Trout Forests) identified that the late submission of a new Forest Resource Inventory (FRI) resulted in forest management planning delays

Principle 4 - Plan Assessment and Implementation

Two out of four audits (Trout Lake and Pic Forests) identified that the operational standards for forest aggregate pits identified in their forest management plans were not consistently met. This has been a trend over the last several years of audits.

Principle 6 - Monitoring

All four audits identified issues with both District and SFL monitoring programs (either with their compliance monitoring and/or with their silvicultural effectiveness monitoring program). While some of this can be attributed to recent COVID restrictions there is an overall reduction in monitoring activities and silvicultural achievements. This has also been a reoccurring issue over the last several years of audits.

Management Unit Specific Findings

Dog River-Matawin Forest

Concluding Statement:

The audit team concludes that management of the Dog River-Matawin 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 Resolute FP Canada Inc., #542459. 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) Disagreement between MNRF and the SFL over the FRI corrections and their timeline was one of the reasons for the delay of the 10-year Forest Management Plan.

- 2) The SFL holder was not in compliance with the Conditions on New and Existing Roads, Landings and Aggregate Pits in the Phase 2 Planned Operations (2014-2019), specifically as it pertains to landings
- 3) MNRF did not meet its forest compliance monitoring targets from the fiscal years 2019/20 to 2021/22.
- 4) Since 2018, MNRF has not had an assessment program in place to validate the accuracy of the SFL's establishment assessment results.

Mazinaw-Lanark

Concluding Statement:

The audit team concludes that the management of the Mazinaw-Lanark 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 Mazinaw-Lanark Forest Inc. # 542621. 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) Internet technology at the Mazinaw-Lanark Forest Inc. office in Cloyne is inefficient for the effective operations of the Sustainable Forest Licence Holder.
- 2) Annual Reports were not consistently submitted and/or resubmitted in accordance with the Forest Management Planning Manual schedule.
- 3) Deficient tracking and monitoring of some harvested areas and renewal treatments by Mazinaw-Lanark Forest Inc. resulted in regeneration or silviculture failures.
- 4) The Silviculture Effectiveness Monitoring program, as implemented, is not fully functional as a monitoring program.
- 5) Despite the actions implemented to address Recommendation #15 of the 2011 - 2016 Independent Forest Audit, the implicated Licensee remains a compliance risk.
- 6) The action items in the 2016 Independent Forest Audit Action Plan did not fully resolve the issues identified by Recommendations #s 15 and 16 of the 2011-2016 Independent Forest Audit.

Best Practice

The proactive cooperation and training by Ministry of Natural Resources and Forestry and Mazinaw-Lanark Forest Inc. to protect the Blanding's turtle while reducing the impact on forest operations is both practical and innovative.

Pic Forest

Concluding Statement:

The audit team concludes that, with the critical exceptions noted below, management of the Pic 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 Nawiinginokiima Forest Management Corporation, #553395. 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 to be addressed by Nawiinginokiima Forest Management Corporation and/or Ministry of Natural Resources and Forestry are as follows:

- Due to poor record keeping it was not possible to assess whether forest management planning was conducted in an open, consultive fashion with First Nation and Metis communities.
- There is lack of guidance by the Ministry of Natural Resources and Forestry with respect to Caribou management, and
- There is a lack of reporting on objective achievement as it pertains to the final year of the 2007 Big Pic Forest Management Plan.

Findings:

- 1) Wawa District MNRF failed to keep complete records of their discussions with First Nation and Métis communities during the development of the 2019-2021 CP and 2021-2031 FMP, including a lack of a Report on the Protection of identified First Nation and Métis Values and a Summary of First Nation and Métis Involvement.
- 2) Planning Team minutes were inadequate as they pertain to First Nation and Métis engagement.
- 3) Lack of provincial caribou management approach for the Coastal and Discontinuous Woodland Caribou Ranges contributed to the 2-year delay of the 10-year Forest Management Plan.
- 4) There was an estimated 3,200 ha of regular harvest area depleted prior to plan approval.
- 5) The SFL holder is not managing logging debris in accordance with the Forest Management Plans and Contingency Plans during the audit period.
- 6) The SFL holder was not in compliance as it pertains to the progressive rehabilitation of Forestry Aggregate Pits.
- 7) The roads and water crossings inventory is incomplete.
- 8) MNRF District does not have an effective compliance monitoring program.
- 9) The SFL Annual Compliance Plan has not been developed to effectively assess program compliance and its effectiveness in accordance with the approved Forest Management Plan.
- 10) NFMC's electronic submission of FOIP reports was not in accordance with timelines specified in MNRF procedures and the FIM.
- 11) The SFL holder reported activities in the 2020/21 Annual Report did not reflect the actual activities.

- 12) The Big Pic final year Annual Report does not provide an appropriate assessment of objective achievement for the 2007 FMP, due to plan end values not being determined for certain indicators.

Trout Lake Forest

Concluding Statement:

The audit team concludes that management of the Trout 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 held by Domtar Inc, #542461. 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) Measurements against the planned herbicide target may not effectively portray the intent of 2021-2031 FMP Objective 8d.
- 2) The MNRF submission of the FRI was late (August 2016) and was one of the reasons for the delay in the development of a 10-year FMP.
- 3) Large topping in certain sawlog-only blocks has resulted in merchantable volume being left unutilized which is considered a wasteful practice under the Ontario Scaling Manual.
- 4) Delays in renewal assessments have reduced the accuracy of renewal reporting and the opportunities for timely intervention with supplementary treatments.
- 5) There are safety and overall conformance issues during times of inactivity in Forestry Aggregate Pits as well as the delayed rehabilitation of aggregate pits.
- 6) District compliance targets on the Forest are not being met.
- 7) SFL compliance targets and requirements on the Forest are not being met.
- 8) There is a lack of a consistent method of reporting on winter road and trail features.
- 9) The current process for reporting and verifying road decommissioning activities is inconsistent in its application.
- 10) Since 2018, MNRF has not had an assessment program in place to validate the accuracy of the SFL's establishment assessment results.

Best Practice

Noteworthy novel practices in road building, in the spirit of Ontario's adaptive management framework, are being implemented in the Trout Lake Forest by Doug Riffel Harvesting with the intent to reduce road building impact to sensitive sites and speed up road rehabilitation after decommissioning.

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