

**Dog River Matawin  
2005-2010 Independent Forest Audit  
Management Unit Action Plan**

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Signature Page

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Approval Page**

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**Date:** April 18, 2012

# **Dog River Matawin 2005-2010 Independent Forest Audit Management Unit Action Plan**

## **INTRODUCTION**

An Independent Forest Audit was conducted on the Dog River Matawin Forest (SFL#542459) by Craig Howard and Associates for the period April 1, 2005 to March 31, 2010. The Independent Forest Audit Process and Protocol, requires that an action plan in response to the audit report be prepared jointly by the Sustainable Forest License (SFL) holder (**AbiBow Canada Inc.**) and Ministry of Natural Resources (MNR), and submitted by the MNR District Manager within 2 months of receipt of the final audit report. The final audit report was received May 30, 2011.

The audit identified 15 recommendations relevant to this management unit action plan in the final report. The action plan provides a description of the actions required, details on who is responsible and the deadlines for each of the action items, as well as methods for tracking progress. R#16 and the licence extension recommendation relevant to corporate MNR are addressed in the separate 2010 IFA Provincial Action Plan.

## **RECOMMENDATIONS**

**R#1:** *Ontario Ministry of Natural Resources shall rewrite the Statement of Environmental Values to more accurately reflect the current state of the Dog River Matawin Forest.*

### **Actions required:**

1. The Statement of Environmental Values consideration document was considered in the District Manager's decision to recommend approval of the 2009-2019 FMP. The FMP was approved December 16, 2008. The consideration document is not intended to cover all aspects of the FMP - as the auditor noted problems of the Dog River Matawin Forest are clearly discussed in the FMP. The next SEV consideration document will be prepared for the 2014-2019 Phase II Plan.

### **Organization and position responsible:**

1. MNR Thunder Bay District – Area Forester

### **Deadline date:**

1. 2014-2019 Phase II Plan by March 31, 2014.

### **Method of tracking progress:**

1. 2014-2019 Phase II Plan SEV consideration document

## **RECOMMENDATIONS**

**R#2:** *Ontario Ministry of Natural Resources (both local and regional) and AbitibiBowater Inc. shall assess the ecoregional impact of missing significant landscape targets over a long time period on the Dog River Matawin Forest.*

### **Actions required:**

1. Since the Dog River Matawin Forest 2009-2019 FMP was completed, the OMNR has produced the supporting science package for the proposed *Forest Management Guide for Landscapes*. This science package provides an eco-regional context for what is believed to be natural conditions. The next Dog River Matawin Forest 2019-2029 FMP will be using the latest science package that supports the *Forest Management Guide for Landscapes*. Part of the development of all new FMP's is the requirement to assess current condition, which will include how the current condition fits with the eco-regional landscape guide science.

### **Organization and position responsible:**

1. AbiBow Canada Inc. Plan Author (lead) with support of Planning Team and Plan Advisors.

### **Deadline date:**

1. March 31, 2018

### **Method of tracking progress:**

1. Completion of the Current Forest Condition Checkpoint in the development of the next Dog River Matawin Forest 2019-2029 FMP.

## **RECOMMENDATIONS**

**R#3:** *AbitibiBowater Inc. shall ensure water crossings on roads no longer in use are maintained or decommissioned to prevent erosion and sedimentation.*

### **Actions Required:**

1. Water crossings will continue to be monitored by qualified individuals for maintenance requirements in accordance with the annual road monitoring and water crossing program as outlined in the FMP and AWS. Water crossing maintenance activities will be prioritized and carried out to minimize adverse effects on the environment and minimize risks to public safety. A three year plan to inspect all water crossings will be put in place starting in the 2012 AWS year.
2. Water crossings will be decommissioned based on a priority ranking system as per the direction in the use management strategies contained within the Dog River Matawin Forest Management Plan
3. A meeting between the MNR and AbiBow staff will be scheduled to review water crossing responsibilities on the Dog River Matawin Forest; this will be done in conjunction with 2014-2019 Phase II planning. This will help to determine who is responsible for the “legacy” water crossings on the license and initiate the process to deal with any outstanding issues.

### **Organization and position responsible:**

1. AbiBow Canada Inc. – Production Superintendent
2. AbiBow Canada Inc. – Production (Lead) /Planning Superintendent
3. AbiBow Canada Inc. –Planning Superintendent Lead, MNR Area Forester, Senior IRM Technician

### **Deadline date:**

1. July 30<sup>th</sup>, 2011, on going; three year plan in place starting in 2012 AWS year
2. 2013-2014 AWS submission and on going.
3. Completed March 2012 and on going

### **Method of tracking progress:**

1. Maps/Roads and Water crossing annual monitoring plan, FOIP reports.
2. Water Crossings that are determined for decommissioning will be listed in AWS -1. Water crossings decommissioned will be recorded in the Annual Reports
3. Creation of a new water crossing layer for Phase II, accepted and recorded in the Planning team meeting minutes.

## RECOMMENDATIONS

**R#4:** *AbitibiBowater Inc. shall ensure that its standard operating procedure for minimizing site disturbance caused by machinery is implemented more effectively on all field operations.*

### **Actions required:**

1. Hold joint Stand and Site Guide (*Forest Management Guide for Conserving Biodiversity at the Stand & Site Scales*) field training session with OMNR, Company and Contractor personnel. (May 9<sup>th</sup>, 2011) The objective of this session is to calibrate company and MNR field staff interpretation and implementation of future direction of site disturbance on the Forest. This will also set a common understanding of mutual expectations regarding site-disturbance leading up to the implementation of the Stand and Site Guide, consistent with the 2014-2019 Phase II Plan and Standard Operating Procedure.
2. Hold joint site disturbance session with OMNR district staff, Company and Contractors. (June 23<sup>rd</sup>, 2011) for the purpose of furthering discussion and understanding of site disturbance requirements, present and future in the Standard Operating Procedure.
3. The company in consultation with its contractors and licensees will assess site sensitivity before and during field operations. Operations may be modified based on site conditions, such that site disturbance is minimized. Annual meetings will be held, with all contractors and licensees to provide instruction and updates as to the best management practices for minimizing site disturbance outlined in the Standard Operating Procedure.
4. Tailgate field sessions will update contractors and licensees on prevention measures to minimize site disturbance and modify or move operations as required of the Standard Operating Procedure.

### **Organization and position responsible:**

- 1.- 2. AbiBow Canada Inc. – Production Superintendent (lead), MNR Area Forester, Senior IRM Technician
- 3.- 4. AbiBow Canada Inc. – Production Superintendent

### **Deadline date:**

1. Completed - Field Session May 9, 2011
2. Completed - Field Session June 23<sup>rd</sup> 2011
3. Spring contractor meeting. To be scheduled spring 2012.
4. Beginning spring 2012 and ongoing annually

### **Method of tracking progress:**

1. Attendance records from meetings.
2. Record time and date of field sessions.
3. Training records; Analysis of FOIP data
4. Analysis of FOIP data for issues.



## **RECOMMENDATIONS**

**R#5:** *AbitibiBowater Inc. shall employ more effort to apply its debris management standard operating procedure in order to conform to the slash management requirements stated in the approved forest management plan.*

### **Actions Required:**

1. Conduct leadership team review of debris management to ensure that it is compliant with all current requirements. Conduct a meeting with MNR to review the Debris Management for compliance with all current requirements (MNR Northwest Region Direction, *Forest Management Guide for Natural Disturbance pattern Emulation*). Add an Appendix to the AWS to address debris management.
2. Develop debris management practices communication training tool and apply in a continuous improvement Bulletin training.
3. Conduct a slash pile burn program annually to remove those piles not deemed to be used for Biofibre.

### **Organization and position responsible:**

1. AbiBow Canada Inc. – Planning Superintendent (Lead), Production Superintendent and MNR Thunder Bay District - Area Forester
2. AbiBow Canada Inc. - Certification Coordinator
3. AbiBow Canada Inc. - Renewal Superintendent

### **Deadline date:**

1. Complete - AbiBow/MNR meeting – January 19, 2012 - AWS approval by March 13, 2012
2. Bulletin – April 30, 2012.
3. December 30, 2012 and on going

### **Method of tracking progress**

1. Completed - Meeting held and minutes taken, AWS approved
2. Bulletin sent out.
3. AWS scheduling of slash pile burning, Annual Report records of actual work completed.

## **RECOMMENDATIONS**

**R#6:** *AbitibiBowater Inc. shall ensure that its protocol for preparing forest operations prescriptions meets the requirements of the Forest Management Planning Manual and that any alterations or modifications to a prescription shall be documented and certified by a registered professional forester prior to the altered operation being implemented. Further, AbitibiBowater Inc. shall ensure that contractors fully understand the harvest prescription on sites slated to be naturally renewed.*

### **Actions required:**

1. Specifically, the auditors noted that in some cases the prescription had been altered without the change being certified by and RPF, as required by the FMPM. Notification will be sent to silviculture foresters reminding them of the FMPM requirement. The company will monitor FOP records on a periodic basis to ensure the requirement is being implemented.
2. The mechanism for communicating the requirement for areas where natural regeneration is to occur takes the form of a “harvest sign off map”. This map is produced for all harvest blocks and is signed off by both the company operations forester and a harvest contractor representative. The intent is to ensure that the prescriptions for any given block are jointly understood and communicated (including any requirements for group seed trees, CLAAG). Blocks with natural renewal prescriptions will be identified on the harvest sign-off block and discussed between the company and contractor or overlapping licensee. Any changes to the prescription are to be communicated back to the company and a FOP change documented and certified by an RPF. A letter will be sent to operations foresters, responsible for sign-off maps, discussing the need for properly certified FOP prescriptions should there be a change at the operational level. The company will monitor FOP records on a periodic basis to ensure the requirement is being implemented.

### **Organization and position responsible:**

1. AbiBow Canada Inc. – Renewal Superintendent.
2. AbiBow Canada Inc. – Renewal Superintendent

### **Deadline date:**

1. Letter July 15, 2011 (completed) & ongoing monitoring
2. Letter July 15, 2011 (completed) & ongoing monitoring

### **Method of tracking progress:**

1. Letter sent to silviculture foresters; record documenting periodic review of FOP records
2. Sign-off map showing natural prescription on file. Letter to operations foresters, on file; record documenting periodic review of FOP records.

## **RECOMMENDATIONS**

**R#7:** *AbitibiBowater Inc. shall ensure that areas treated with natural regeneration are reported in the annual reports in accordance with the requirements of the Forest Management Planning Manual and the Forest Information Manual. Furthermore, AbitibiBowater Inc. shall review its harvest and silviculture databases to ensure that all backlog areas have been assigned a renewal treatment and that unreported areas are documented and reported in the next annual report.*

### **Actions required:**

1. Renewal foresters will be reminded, via a letter, of the need to report natural regeneration in accordance with the FMPM and FIM. The FMPM currently states “Areas planned for natural regeneration will normally be reported in the year in which the disturbance (harvest or natural) occurred. If salvage harvest is being considered in areas of natural disturbance, reporting of natural regeneration may be delayed for one or two years.” This action is intended to address the reporting of natural regeneration moving forward.
2. Harvest and silviculture databases will be reviewed to assess any backlog areas without renewal treatment assigned. This action is to assess the current state of natural regeneration reporting and will identify any backlog areas.
3. Any naturally regenerated areas found through action 2 that have not been reported will be reported in the 2011-2012 AR.

### **Organization and position responsible:**

1. AbiBow Canada Inc. - Renewal Superintendent.
2. AbiBow Canada Inc. - Renewal Superintendent.
3. AbiBow Canada Inc. - Renewal Superintendent.

### **Deadline date:**

1. Letter sent. Completed October 31, 2011 and ongoing annually.
2. May 15, 2011 Complete
3. November 15, 2012

### **Method of tracking progress:**

1. Letter, records of discussion on file at AbiBow
2. Data table and map product on file from review exercise.
3. 2011-2012 AR

## **RECOMMENDATIONS**

**R#8:** *AbitibiBowater Inc. shall increase efforts to meet targets for pre-commercial thinning and ensure that the objectives of the pre-commercial thinning treatments are clearly understood by contractors and work is closely supervised.*

### **Actions required:**

1. As stated in the text of the 2009-2019 FMP the target for commercial thinning is 1,000 hectares per year. The targets were established on the basis of areas that were treated using basic silviculture (seeded in the past). This level of activity was included in the strategic model without verification that the suitable existed on the ground. At the end of the second AWS period 446 hectares have been completed. Ground surveys are necessary to assess suitability of sites for the conduct of juvenile spacing. The identification of suitable areas through surveys is ongoing. Juvenile spacing will be included in future AWSs and an annual program will be conducted and results reported in Annual Reports.
2. The objective of a pre-commercial thinning operation can take different forms depending on the conditions encountered on site in terms of species and densities encountered. Site specific objectives will be communicated to contractors through project discussions and as documented on a project sign-off map which will be provided to contractor.
3. Silviculture Foresters will monitor the progress of pre-commercial thinning projects to ensure the objectives for the project are being met and a compliance report will be submitted.

### **Organization and position responsible:**

1. AbiBow Canada Inc. – Renewal Superintendent.
2. AbiBow Canada Inc. – Renewal Superintendent.
3. AbiBow Canada Inc. – Renewal Superintendent.

### **Deadline date:**

1. Ground surveys ongoing annually beginning 2010; inclusion in AWS Annually beginning with 2010 AWS and AR
2. Completed July 15, 2011 and on-going
3. Beginning July 15, 2011 and on-going.

### **Method of tracking progress:**

1. Ground survey records, AWSs, Annual Reports will document efforts.
2. Record of communication with contractors – sign off map on file.
3. Record of visits and audits of pre-commercial thinning project contract areas and completed FOIP compliance inspections.

## **RECOMMENDATIONS**

**R#9:** *AbitibiBowater Inc. shall ensure that all road maintenance contractors and workers receive appropriate training on proper grading practices in order to reduce or eliminate the formation of “false ditches”.*

### **Actions required:**

1. The company will communicate best management practices for proper grading (including to reduce or eliminate formation of false ditches) and to minimize environmental impacts from grading. This will be done through a series of meetings will be scheduled with all contractors and licensee’s who presently maintain roads on the Dog River – Matawin Forest.
2. A continual improvement bulletin on grading practices will be developed and provided to contractors as a training tool for operators.
3. Ongoing monitoring of grading practices will be concurrent with operations. Where required in the FMP/AWS FOIP reports will be submitted.

### **Organization and position responsible:**

1. AbiBow Canada Inc. – Production Superintendent (Lead) and Certification Coordinator.
2. AbiBow Canada Inc. – Certification Coordinator.
3. AbiBow Canada Inc. – Production Superintendent.

### **Deadline date:**

1. April 30, 2012 and ongoing annually
2. Bulletin completed by April 30, 2012, provided to contractors at that time and ongoing
3. Beginning May 1,2012 and ongoing

### **Method of tracking progress:**

1. Documented meetings.
2. Creation of Continual Improvement Bulletin, records of distribution to contractors.
3. Analysis of FOIP data.

## **RECOMMENDATIONS**

**R#10:** *Ontario Ministry of Natural Resources shall make arrangements as soon as reasonably possible to have the bridge on the Pakashkan Road repaired or replaced to meet current design and environmental standards.*

### **Actions required:**

1. Bridge repairs as outlined by the MNR Regional Engineer to bring this structure to the Provincial Standard.

### **Organization and position responsible:**

1. MNR Thunder Bay District, Thunder Bay South Senior IRM Tech

### **Deadline date:**

1. September 30, 2012

### **Method of tracking progress:**

1. Repairs and inspection report completed

## **RECOMMENDATIONS**

**R#11:** *AbitibiBowater Inc. and Ontario Ministry of Natural Resources shall use the necessary steps to ensure that all timber piled along roadways as a result of work performed under the Road Construction and Maintenance Agreement shall be utilized to the fullest extent possible. Furthermore, steps shall be taken to clarify the legal encumbrances regarding the timber harvested by Buchanan Forest Products Ltd. so that this timber can also be utilized.*

### **Actions required:**

1. AbiBow will address utilization issues with merchantable wood at roadside associated with the Company's right-of-way clearing operations as a result of work performed under the Road Construction and Maintenance Agreement. This fibre will be put through a grinder and used as forest biofibre. Road right-of-way utilization issues exist on the Sedin, Mack, and Dog River Roads.
2. AbiBow will work cooperatively with the Ontario Ministry of Natural Resources to address the forest management issues associated with unutilized Crown timber that were harvested by the Buchanan Group of Companies. MNR has the lead role in developing the action plan to address this issue.

### **Organization and position responsible:**

1. AbiBow Canada Inc. – Planning Manager
2. MNR Thunder Bay District – District Manager (lead for action plan)

### **Deadline date:**

1. Completed in 2010.
2. Action plan by September 30, 2012

### **Method of tracking progress:**

1. Action 1 has already been completed. Roadside material on the Sedin, Mack, and Dog River Roads was put through a grinder in 2010, and used as forest biofibre at the Company's Thunder Bay mill.
2. Action Plan. Progress on the utilization or treatment of the BFP roadside fibre will be tracked in the Annual Reports, until the issue is resolved.

## **RECOMMENDATIONS**

**R#12:** *Ontario Ministry of Natural Resources, either corporately or locally, shall verify that the subset of Natural Resource Values Information System (NRVIS) values provided to AbitibiBowater Inc. is at an appropriate level of detail and includes all pertinent information for a full understanding of the management of non-timber values.*

### **Actions required:**

1. MNR Thunder Bay District will develop and implement a business process flow that requires identifying when data is in area of operations and specifying that the SFL be contacted regarding data submissions that apply to areas of operations. The District will review Appendix 3 of the FIM Base and Values Technical Specification that identifies the information exchange provided to the forest industry.
2. If there are additional values requirements MNR Thunder Bay District will submit to the NRVIS Support desk as per the directions set out in FIM. One time ad-hoc data requests can also be submitted to the NRVIS support desk.
3. MNR Thunder Bay District will review the base data and values information layers supplied to the SFL through the FI Portal for accuracy and completeness, and in particular, will review the key planning layers.

### **Deadline Date:**

1-3. Ongoing beginning November 1, 2011

### **Organization and Position Responsible:**

1. MNR Thunder Bay District -GSO
2. MNR Thunder Bay District - GSO
3. MNR Thunder Bay District - GSO, Area Forester, Senior IRM Technician

### **Method of Tracking Progress:**

1. Written record of business process flow. The required status report will provide an update on how the process flow has been implemented
2. The required status report will document implementation of stated action.
3. The required status report will document implementation of stated action.



## **RECOMMENDATIONS**

**R#13:** *AbitibiBowater Inc. shall develop a tracking system to ensure that all operations are inspected for compliance in accordance with requirements of The Forest Compliance Handbook and its environmental management system procedures.*

### **Actions required:**

1. AbiBow and the MNR will review the 2009-2019 FMP 10-year Compliance Plan and 2011-2012 AWS compliance text to update the plan with the 2010 Forest Compliance Handbook. An FMP amendment will be processed to bring in changes and from 2011 onwards the AWS will match the FMP and annual requirements of the Handbook.
2. AbiBow will develop a tracking system in accordance with the requirements of the FMP and AWS, that ensures that all harvested areas are inspected prior to the commencement renewal activities

### **Organization and position responsible:**

1. AbiBow Canada Inc. - Planning Superintendent (lead), MNR Thunder Bay District – Area Forester
2. AbiBow Canada Inc. - Operations Forester

### **Deadline date:**

1. Completed FMP amendment/AWS to match – Amendment March 11, 2011, AWS approved March 12, 2011
2. June 30, 2012 and ongoing

### **Method of tracking progress:**

1. FMP amendment approved and AWS approved.
2. Tracking system in place, appropriate documentation sent, no FOIP issues recorded

## **RECOMMENDATIONS**

**R#14:** *AbitibiBowater Inc. shall undertake a gap analysis to determine the factors that are contributing to the lack of historical treatment information in its databases and develop strategies for filling the information gaps.*

### **Actions required:**

1. As described by the auditors in the background to this recommendation the company has implemented an improved tracking system since 2006. The auditors also indicate that the lack of historical treatment information is evidenced by the prevalence of “Unknowns” in table AR 13 (Annual Report of Assessment of Regeneration and Silvicultural Success). As documented in AbiBow’s annual reports the issue of “unknowns” is expected to diminish once areas being assessed for FTG occurs on areas where all records are stored on the new tracking database. Regardless, AbiBow will conduct an assessment of current databases and database queries to assess why the frequency of “unknowns” exist in AR table 13 for use in implementing improvements (see action 2) to reduce the frequency of unknowns in the near term.
2. Adjustments to queries, databases, or linkages, as the case may be, to reduce the frequency of unknowns reported in table AR-13.

### **Organization and position responsible:**

1. AbiBow Canada Inc. – Renewal Superintendent.
2. AbiBow Canada Inc. – Renewal Superintendent.

### **Deadline date:**

1. May 30, 2011 Completed
2. November 15, 2012 and ongoing annual with annual reports.

### **Method of tracking progress:**

1. Record of assessment of databases.
2. Reduction in frequency of “unknowns” in table AR 13.

## **RECOMMENDATIONS**

**R#15:** *AbitibiBowater Inc. shall review the Year 10 (2008-09) Annual Report to improve the consistency of the numbers quoted in the text, ensure the numbers are consistent with those listed in the tables, make the appropriate adjustments to the planned level numbers, and adjust the analysis in the text accordingly.*

### **Actions required:**

1. The year 10 (2008 – 2009) Annual Report will be reviewed for discrepancies in numbers quoted in the text, including between the numbers quoted in the text and those shown in the tables. Planned level numbers will be adjusted to account for the shortened (four year) review period. Where discrepancies are found the numbers will be corrected and the analysis adjusted if required.

### **Organization and position responsible:**

1. AbiBow Canada Inc. – Planning Superintendent.

### **Deadline date:**

1. Completed - September 30, 2011

### **Method of tracking progress:**

1. Acceptance through the FI Portal