

ROMEO MALETTE FOREST

2007 –2012 INDEPENDENT FOREST AUDIT

MANAGEMENT UNIT ACTION PLAN

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Action Plan Signature Page

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INTRODUCTION

An Independent Forest Audit was conducted in September 2012 on the Romeo Malette Forest (SFL # 550398) for the period April 1, 2007 to March 31, 2012. The following action plan was developed to address the recommendations documented in the final audit report which was accepted by the Forestry Futures Committee on June 26th, 2013.

RECOMMENDATIONS

Recommendation #1:

The OMNR Regional Director shall ensure that the terms of reference are approved prior to the issuance of the public invitation to participate.

Actions Required:

1. Tembec and the MNR District Office will ensure that the Terms of Reference (TOR) and Project Plan are drafted well ahead of time, to allow adequate time for possible delays (e.g., in 2009 it was late due to lack of sign off by First Nations representatives).
2. The MNR Regional Forest Management Planning (FMP) Specialist will ensure that the TOR is signed off by the Regional Director prior to issuance of the public invitation to participate for the 2019 FMP.

Organization and position responsible:

1. Tembec – Planning Superintendent, and MNR Timmins District – Planning and Information Supervisor
2. MNR Northeast Region – FMP Specialist

Deadline date:

1. Approximately January 1st, 2016, depending on the 2019 FMP production schedule.
2. April 1st, 2016 (or whenever the Invitation to Participate is issued).

Method of tracking progress:

1. Progress will be tracked via the signature dates on the TOR.
2. Progress will be tracked via the signature dates on the TOR.

Note on recommendation - during the development of the Planned Operations for Phase II, the Terms of Reference was approved by the Regional Director on February

6th, 2013 which was prior to the public notification for Stage One of public consultation (February 14th, 2013).

Recommendation #2:

Corporate OMNR should provide a summary of the provincial wildlife monitoring program, describing how wildlife monitoring information is collected provincially and applied to the 2009 Romeo Malette Forest management plan.

Background

In 2010 MNR published the “Provincial Wildlife Population Monitoring Program Plan” which describes how wildlife monitoring information is collected provincially. The program is designed to provide population trend information on selected species at the provincial level rather than at an individual management unit level, however the information may provide insights for consideration by forest management planning teams. Decisions regarding application of these insights are made by individual planning teams. These insights were not applied in the development of the 2009 Romeo Malette FMP.

Actions Required:

The MNR Timmins District Area Biologist will provide a copy of the “Provincial Wildlife Population Monitoring Program Plan” to the LCC and summarize how provincial wildlife monitoring information will be considered in future Forest Management Planning on the Romeo Malette Forest and provide this summary to the LCC.

Organization & position responsible:

MNR Timmins District – Area Biologist

Deadline date:

March 31, 2014.

Method of Tracking Progress:

Progress will be tracked via the delivery of report and summary to LCC.

Recommendation #3:

OMNR and Tembec should review the procedure to address NRVIS updates and prepare a joint protocol to ensure the process is efficient, that the level of effort is appropriate for both parties, and to ensure all Company updates/corrections are provided to NRVIS promptly.

Actions Required:

1. OMNR and Tembec will meet to review and understand the existing protocol for NRVIS updates and identify any potential gaps or issues (i.e., values that require updates at a provincial level). If there are gaps or issues identified, the protocol will be amended accordingly.

2. For non-land ownership values, such as cottages, trapper cabins, stick nests and streams, Tembec and MNR will be more diligent in following the direction laid out in the *Forest Information Manual (FIM, 2009)*. This procedure includes specified timelines for updates.

Organization and position responsible:

1. MNR Timmins District – Planning and Information Management Supervisor, and Tembec – Forest Information Services Coordinator
2. Tembec – Forest Information Services Coordinator, and MNR Timmins District – Planning and Information Management Supervisor

Deadline date:

1. Prior to required status report update for this action plan – anticipated to be the fall of 2015 depending on date of action plan approval.
2. Ongoing – no phase in required.

Method of tracking progress:

1. Progress will be tracked via the Action Plan Status Report.
2. Progress will be tracked via the Action Plan Status Report, plus, records of individual updates, through the FI portal.

Footnote: The following is provided by MNR Regional Lands staff: The issue of the accuracy of our land ownership layers in Land Information Ontario (LIO) is a provincial issue. The data custodians at the Geographic Information Branch who manage the private land layers in LIO have been contacted and will review current protocol for updates to the patent land base data and look at additional options for improvements to our data correction processes.

The ministry recognizes the importance of accurate land ownership data and recently completed a provincial wide project called LT3 in order to ensure that accurate parcel data is represented in the ownership layers in LIO. The project involved GIS analysis aligning the land tenure data to a standard parcel fabric and Crown tenure data was compared to main office databases to identify any discrepancies and matches for tenure information. Main office and district lands staff confirmed the ownership of parcels with all available data sources to resolve parcels that had discrepancies from the GIS Analysis. Professional titles searches were procured for private lands where data could not be confirmed with ministry records. As a result of the project new base data land ownership layers were created including the patent land layer.

At the district level if an error is found with the private land layer there is a process in place for district GSO staff to provide corrections needed to the base data to the Geographic Information Branch.

Recommendation #4:

Tembec shall ensure other alternative harvesting prescriptions such as conventional harvest and group seed tree are implemented on sites where CLAAG is considered inappropriate or not recommended for achieving silvicultural objectives.

Actions Required:

1. Prior to pre-operations start-up meetings, Tembec will review areas where CLAAG is prescribed. Areas that do not appear to be suitable for CLAAG will be stratified and alternative harvest prescription(s) will be identified. This information will be provided to the contractor or overlapping licensee.
2. Additionally, within winter harvest blocks, areas where CLAAG is not recommended (i.e., based on forest unit/ecosite) will be identified and an appropriate harvest prescription will be applied. This information will be provided to the contractor or overlapping licensee during the pre-operations start-up meeting.

Organization and position responsible:

1. Tembec – Operations Superintendent and Silviculture Coordinator
2. Tembec – Operations Superintendent and Silviculture Coordinator

Deadline date:

1. Ongoing – no phase in required.
2. Ongoing – no phase in required.

Method of tracking progress:

1. Progress will be tracked via the Action Plan Status Report, plus documentation of pre-operations start-up meetings.
2. Progress will be tracked via the Action Plan Status Report, plus documentation of pre-operations start-up meetings.

Recommendation #5:

Tembec shall strive to make greater efforts to reduce the productive area covered by slash, including lowland sites, by fulfilling the incomplete actions (with the exception of action #5) the Company proposed to implement to address Recommendation #18 from the 2007 IFA. Cooperation of the MNR Timmins District shall be sought as needed to complete the actions.

Actions Required:

1. Tembec will develop a mechanism for calculating an annual forecasted target for slash management and include same in the Annual Work Schedule (AWS).
2. Tembec will implement an AWS slash program as per forecast to achieve or exceed a rolling annual average of forecasted gross treatable hectares per year. Tembec will report the achievement of slash management targets annually in the Annual Report, as well as provide spatial information on slash management as per the revised annual report technical specifications for slash management.

3. Tembec will measure/monitor the reduction of slash piles on the Romeo Malette Forest.
4. Tembec will continue to lobby and work with the OMNR to facilitate the burning of flat piles on lowland sites and to investigate other methods to reduce slash piles, including the use of slash for hog fuel/biofibre, where markets exist.

Organization and position responsible:

1. Tembec – Planning Superintendent
2. Tembec – Planning Superintendent
3. Tembec – Planning Superintendent
4. Tembec – Planning Superintendent

Deadline date:

1. December 30th, 2013, and for subsequent years.
2. November 15th, 2013, and for subsequent years.
3. Ongoing – no phase in required.
4. Ongoing – no phase in required.

Method of tracking progress:

1. Progress will be tracked via the inclusion of slash management targets in the Annual Work Schedule.
2. Progress will be tracked via the reporting of slash management treatment areas (as compared to AWS targets) in the Annual Report.
3. Progress will be tracked via the Action Plan Status Report.
4. Progress will be tracked via the Action Plan Status Report.

Recommendation #6:

OMNR District and the Company should review their current agreement (dated November 2007) regarding stream classification and permanency and update it to recognize the present procedures.

Background

The action plan developed does not meet the letter of the recommendation, however, in combination with information provided below, Tembec and the OMNR feels the proposed actions meet the intent of the recommendation.

During the development of the 2009 FMP there were a number of discrepancies between the MNR (NRVIS) stream data and Tembec's new enhanced forest resource inventory (EFRI) stream data, specifically regarding the permanency classification of streams and in some cases, the spatial location of streams. To address these discrepancies an agreement was developed to commit to the review of all disputed streams in the field prior to operations, which proved to be logistically challenging. During the recent development of the Draft Planned Operations for Phase II of the 2009 FMP, these discrepancies continued to exist and provided a challenge to the planning team for the appropriate application of the Stand and Site Guide (SSG) riparian Area of

Concern (AOC) prescriptions. The intent of the planning team was to address any discrepancies prior to the approval of the FMP, and thus eliminate the need to maintain an agreement on values verification. The following steps were taken to address this issue:

- The Tembec hydrology (streams layer) has been used to reflect the spatial location of streams.
- Stream values in the proximity of planned operations were reviewed by the MNR and any discrepancies in the Tembec hydrology from NRVIS hydrology were identified.
- Discrepancies were reviewed by the MNR Biologist and GIS staff as well as Tembec staff. Based on the review adjustments to the Tembec hydrology were made, including:
 - Incorporating any NRVIS streams missing from the Tembec hydrology dataset
 - Updating the spatial locations of streams based on new EFRI imagery (on-screen digitizing)
 - Updating classification attributes (as per NRVIS) ensuring adequate protection via AOC application was afforded (i.e. Tembec ephemeral streams being updated to intermittent)

Based on the review there were some streams where the discrepancies were more difficult to reconcile without further verification in the field. These were flagged as unclassified streams on the Draft Planned Operations Maps and will be ground checked by Tembec/MNR prior to the Final Planned Operations Submission.

Actions Required:

1. Verify the presence/classification of outstanding unclassified streams prior to the submission of the Final Planned Operations; otherwise apply AOC protection based on the most conservative dataset (NRVIS).
2. During the implementation of operations any discrepancies between mapped stream values and actual ground conditions will be addressed using the changes to values procedures outlined in the *Forest Management Planning Manual (FMPM, 2009)* and the *Forest Information Manual (FIM, 2009)*.

Organization and position responsible:

1. MNR Timmins District – Planning and Information Management Supervisor, and Tembec – Planning Superintendent
2. Tembec – Operations Superintendent, and MNR Timmins District – Planning and Information Management Supervisor

Deadline date:

1. October, 2013 (based on the current production schedule for Planned Operations for Phase II of the 2009 FMP).
2. Ongoing – no phase in is required.

Method of tracking progress:

1. Progress will be tracked via documentation in the Final Planned Operations Text.
2. Progress will be tracked via the Action Plan Status Report, plus, records of values changes through the FIPortal.

Recommendation #7:

Tembec shall ensure that, in all situations where the Silviculture Ground Rule applied to a particular site has been altered, the changes are properly documented in accordance with the requirements of the 'Forest Management Planning Manual' and the 'Forest Information Manual'.

Actions Required:

Tembec will ensure an SGR change layer, that is consistent with the direction of the *FMPM* and *FIM*, is submitted as part of the Annual Report Submission.

Organization and position responsible:

Tembec – Planning Superintendent

Deadline date:

Ongoing – no phase in is required.

Method of tracking progress:

Progress will be tracked via the inclusion of an SGR layer in the Annual Reports.

Note on recommendation - Following the Independent Forest Audit, Tembec had discussions with both Provincial and District MNR staff to propose a consistent approach to be used to develop the SGR change layer. This approach was then used to develop the SGR change layer that was included in the resubmission of the 2011-2012 Annual Report (published on February 7th, 2013) to highlight where the treatment SGR varied from the SGR presented in the planned harvest coverage (from the FMP) or the depletion coverage (from previous annual reports).

Recommendation #8:

Tembec shall work in consultation with OMNR Timmins District to ensure that dated "open" task issues appearing in the Forest Operations Inspection Program (FOIP) database have been addressed to a mutually satisfactory conclusion.

Actions Required:

Tembec and the MNR Timmins District will meet to review the "open" task issues to determine the status of the items and follow up accordingly (i.e., close the task or create an action plan to complete the task).

Organization and position responsible:

Tembec – Operations Superintendent, and MNR Timmins District – Senior Forestry Technician

Deadline date:

October 31st, 2013.

Method of tracking progress:

Progress will be tracked via the Action Plan Status Report, plus, records of closed task issues in the FOIP database.

Recommendation #9:

Tembec shall ensure that the requirements for compliance reporting, including the frequency of reporting, are reviewed at least annually with all overlapping licensees and contractors.

Actions Required:

Tembec will review the requirements for compliance reporting with overlapping licensees and contractors, at least annually, during pre-operations start up meetings.

Organization and position responsible:

Tembec – Operations Superintendent

Deadline date:

Ongoing – no phase in required.

Method of tracking progress:

Progress will be tracked via the Action Plan Status Report.

Note on recommendation - Recent pre-operations meetings have taken place with overlapping licensees, including:

- EACOM, February 8, 2013, Pre-operations start-up for new overlapping licence - the 10 year compliance plan for the RMF was reviewed and provided to EACOM, as well as Section 3.2.7 of the AWS (Monitoring and Assessment).
- Millson Forestry Service (MFS), June 17, 2013, Pre-operations start-up for a new overlapping licence - the 10 year compliance plan for the RMF was reviewed and provided to MFS, as well as Section 3.2.7 of the AWS.

Recommendation #11:

Tembec, in consultation with MNR Northeast Region, shall undertake a structured analysis to ascertain reasons for the moderate achievement in silvicultural success results from recent free-to-grow surveys and take appropriate steps, if necessary, to improve the silvicultural success rates or determine the impact of accepting the results in future strategic modeling exercises.

Actions Required:

1. Tembec will review recent FTG data for accuracy and consistency and use findings to identify a process for updating the FTG records on an annual basis.

2. Tembec will consider updating past FTG results from the 2009 FMP based on revised silviculture ground rules developed for Phase II Planned Operations to incorporate new SGRs developed to reflect potential silviculture successes for each forest unit.
3. Tembec will provide a more detailed assessment and discussion on silvicultural success through its regular annual reporting, to provide context to the current Table AR-13 (Summary of Assessment of Regeneration and Silviculture Success), which is submitted as part of the Year 7 and Year 10 Annual Reports.
4. Based on the results of recent FTG surveys, Tembec and the MNR (Region and District) will take appropriate steps, if necessary, to improve the silvicultural success rates, or determine the impact of accepting results in future strategic modeling exercises.

Organization and position responsible:

1. Tembec – Planning Superintendent
2. Tembec – Planning Superintendent
3. Tembec – Planning Superintendent
4. Tembec – Planning Superintendent, MNR Timmins District – Planning Forester, and MNR Northeast Region – FMP Specialist (or Regional Resource Analyst)

Deadline date:

1. October 15th, 2013.
2. November 15th, 2014.
3. November 15th, 2013, and in subsequent annual reports.
4. Approximately April 1st, 2017 (or prior to finalizing the Long Term Management Direction for the 2019 FMP, depending on the FMP production schedule).

Method of tracking progress:

1. Progress will be tracked via the Action Plan Status Report.
2. Progress will be tracked via the Action Plan Status Report, and via record of amendment submission through the FIPortal.
3. Progress will be tracked via reporting on silviculture effectiveness in the Annual Reports.
4. Progress will be tracked via the Action Plan Status Report.

Recommendation #12:

Tembec shall explore opportunities for improving the accuracy of the FTG stand delineation and stand attributes.

Actions Required:

Tembec will pre-stratify FTG working maps by forest unit and/or treatment type prior to conducting FTG flights.

Organization and position responsible:

Tembec – Silviculture Coordinator

Deadline date:

Prior to conducting FTG flights, annually

Method of tracking progress:

The free to grow coverage will be reviewed prior to submission in the annual report to determine if level of stratification is consistent with the treatments and forest type. Observations at this stage will be used to inform stratification efforts for the following year.

Note on recommendation – The FTG working maps used during the FTG flights conducted in the fall of 2012 were stratified using forest units, which resulted in the delineation of more distinct stands compared to FTG programs from the recent past.

Recommendation #13:

Tembec shall improve the quality of the trends analysis in the relevant annual reports by using the approaches suggested in the Annual Report Preparation and Review Protocol, or developing alternative analytical approaches in consultation with OMNR experts.

Actions Required:

1. Tembec will review new versions of the Annual Report Preparation and Review Protocol prior to the preparation of the annual report to ensure any changes or suggested approaches are incorporated into the Annual Report.
2. Tembec shall discuss how to enhance its analysis of long-term trends with appropriate OMNR experts in advance of the preparation of the Year 7 Annual Report (2015-2016 AR).

Organization and position responsible:

1. Tembec – Planning Superintendent
2. Tembec – Planning Superintendent

Deadline date:

1. Prior to September 15th, annually
2. July 15, 2016

Method of tracking progress:

1. New versions of the Annual Report and Preparation and Review Protocol are posted on the FIPortal and will be used to prepare and review (OMNR) the annual report.
2. Documentation of meetings and/or discussions with OMNR experts on the analysis of long-term trends.

Note on recommendation: Tembec has recently submitted the Year 3 Annual Report for the Romeo Malette Forest (published February 7, 2013) which included extensive analysis and documentation of the impact of the Timmins 9 fire on the Long Term Management Direction for the 2019 FMP. Feedback provided to Tembec from the MNR (District and Region) indicated a high level of quality and detail in this annual report.