



FRENCH-SEVERN FOREST INDEPENDENT FOREST AUDIT 2016-2021

Monday, January 3rd, 2022

ABSTRACT

The following report describes the findings from the French-Severn Forest Independent Forest Audit. The audit term covers a five-year period: April 1st, 2016 – March 31st, 2021.

Responsible Forestry Solutions

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1. EXECUTIVE SUMMARY

Independent Forest Audits are conducted regularly on all Crown Forests in Ontario to meet the requirements of regulation 319/20 of the Crown Forest Sustainability Act. This Independent Forest Audit was conducted by Responsible Forestry Solutions for the French-Severn Forest - SFL #542411.

The Sustainable Forest Licence for the French-Severn Forest is held by Westwind Forest Stewardship Inc., a not-for-profit community-based forest management company. The Forest is administered by the Ontario Ministry of Northern Development, Mines, Natural Resources and Forestry Parry Sound District in the Southern Region, providing technical support and oversight. The audit scope includes the implementation of the last three years under the 2009-2019 Phase II Forest Management Plan, the preparation of the 2019-2029 Forest Management Plan, and the implementation of the first two years of the 2019-2029 Forest Management Plan. Responsible Forestry Solutions conducted a Risk Assessment of the need to address any of the Optional Procedures listed in the 2021 Independent Forest Audit Process and Protocol.

The French-Severn Forest is located within the Parry Sound District, and it extends from Georgian Bay in the west to Algonquin Park and the Bancroft-Minden Management Unit in the East. The Forest is part of the Great Lakes-St. Lawrence Forest Region, which is characterized by deciduous species such as sugar maple, yellow birch, and beech and coniferous species such as eastern hemlock, eastern white pine, and red pine. The eastern half of the Forest is dominated by hardwood forests that are primarily managed using the selection and uniform shelterwood silvicultural systems. The western half of the forest has many white pine stands managed under a uniform shelterwood system. These partial cutting systems have an aesthetic advantage which is very important given the high recreational use of the forest by full time residents and part-time residents from large urban areas in the south. The clear cut silvicultural system is not commonly used but is used in the northwest quadrant of the Forest dominated by conifer stands.

The audit included a field assessment (September 28th and 29th, 2021) and office visits (October 4th and 5th, 2021). The audit team consisted of four auditors including a certified compliance inspector and a certified tree marker. The Public Consultation process was carried out as required in the 2021 Independent Forest Audit Process Protocol.

The field inspections covered a range of activities carried out in the management of the French-Severn Forest, from site preparation and tending to roads and water-crossings, harvesting, and regeneration. The audit team found that the planning process met the requirements of the 2009 and 2017 Forest Management Planning Manual in the development of the 2019-2029 Forest Management Plan. The management of the French-Severn Forest, as well as the technical support and oversight provided by Ministry of Northern Development, Mines, Natural Resources, and Forestry, generally comply with existing the legislation, regulations, and

policies. The audit team verified the implementation of the recommendations made in the previous independent forest audit held in 2016 and the achievement of planning objectives for the 2009-2019 Forest Management Plan.

The Long-Term Management Direction was based on the 2009 FMPM while the Operational Planning was based on the 2017 Forest Management Planning Manual. The use of the new Enhanced Forest Resource Inventory resulted in less non-forested area, more hemlock and more oak due to smaller polygon delineation, and an increase in stands with higher productive site classes.

Access development was found to be well executed and in accordance with the Forest Management Plan. Water crossing installations had sufficient measures in place to mitigate streambed siltation and other aquatic/fisheries values. Access planning and decommissioning was well thought out. Some operational issues were noted on a sample of the aggregate pits viewed during the field audit.

Historical harvesting levels on the French-Severn Forest have always fallen below the planned allocations. From 1994-2009, 49% of the allocated harvest volume was harvested. During the audit term most of the tree planting occurred in pine shelterwood cuts, with fluctuating levels of planting throughout the term (28% of planned planting levels). Actualized planting levels are in line with the achieved level of harvest during the audit terms (36% of planned harvest area). Overall, the artificial renewal program was found to be well executed, however seedling sizing issues were noted during the 2020 planting. Very low planted seedling stocking was observed in several of the audit stops. However, Westwind's monitoring program aims to ensure that these sites will receive appropriate remedial treatments.

Primarily, tending is done aerially due to the difficulty in finding contractors to complete ground spray because of the relatively small size of the tending program. There were good results observed in controlling shrub competition, however ground vegetation is a challenge. The audit team found that 53% of planned tending was implemented during the term.

Implementation of the pine shelterwood system is appropriate with adequate tending and regeneration through final removal. A significant transition from Hardwood Selection Forest Unit to Hardwood Uniform Shelterwood Forest Unit when compared to previous plan level was triggered by factors such as Beech Bark Disease. The implementation of 3-cut shelterwood system was found to be appropriate with prescribed retention levels that met the increase in Acceptable Growing Stock proportion, and high regeneration. Evidence of Beech Bark Disease treatment was noticed at several stops during the audit. Treatments included Basal Bark¹ on smaller stems and Hack & Squirt² on larger stems. These methods are in-line with the most current research and treatment techniques.

¹ Application of Basal Bark Herbicide using a low-pressure backpack sprayer.

² Small incisions are made in the bark, and herbicide is squirted directly into the incisions.

The implementation of the Beaver Pond Area of Concern is very challenging due to several factors ranging from the protection of aquatic values, time restrictions due to the requirements to protect the Blanding's Turtle, merchantability of the wood, and harvestable volume considerations. In discussions with the Ministry of Northern Development, Mines, Natural Resources, and Forestry and the Licensee, no opportunities have been identified to date that address the challenges described above.

The audit team noted a significant improvement in the Ministry Northern Development Mines Natural Resources and Forestry compliance monitoring since the last audit period with good communication with Westwind. Several joint inspections took place. There were few incidences of non-conformance throughout the audit period.

Contractual and License Obligations were met throughout the audit term. The audit resulted in the documentation of three findings and one best management practice.

The Audit team concludes that management of the French-Severn 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 (# 542411) held by Westwind Forest Stewardship Inc. The forest is being managed consistently with the principles of sustainable forest management, as assessed through the Independent Forest Audit Process and Protocol.



A handwritten signature in blue ink, appearing to be "S. Audet", written in a cursive style.

Stéphane Audet, R.P.F.

Lead auditor of the French-Severn IFA audit team

Date: December 17th, 2021

2. TABLE OF FINDINGS AND BEST PRACTICES

Table 1. Description of findings and best practices

Concluding statement:
The audit team concludes that management of the French-Severn 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 (# 542411) held by Westwind Forest Stewardship 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 and Best Practices:
<i>Finding # 1:</i> Tree planting in pine shelterwood cuts completed during the 2020 season was found to have reduced levels of success.
<i>Finding # 2:</i> The mandatory operational requirements for Forest Aggregate Pits were not fully implemented on all the sites viewed during the field audit.
<i>Finding # 3:</i> The 2018-19 year-10 annual report was found to have numerous data accuracy issues.
<i>Best Practice # 1:</i> The current method and implementation of treatment for Beech Bark Disease is in-line with recent research and practices.

3. INTRODUCTION

3.1 Audit Process

Independent Forest Audits (IFAs) are a requirement of the *Crown Forest Sustainability Act* (S.O. 1994, c. 25) (CFSA). Every publicly owned forest management unit in Ontario must be audited by an independent audit team at least once every ten to twelve years. The auditees include the Sustainable Forest Licence (SFL) holder and the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF).

The Sustainable Forest Licence (SFL #542411) on the French-Severn Forest (FSF) is held by Westwind Forest Stewardship Inc. Westwind is a not-for-profit community-focused forest management company. Westwind provides forest management services as part of its SFL obligations. The NDMNRF Parry Sound District, NDMNRF Southern Region and Corporate NDMNRF provide forest management support services and oversight of Westwind's forest management activities.

Responsible Forestry Solutions (RFS) conducted the IFA on the French-Severn Forest (also identified as 'the Forest' in this report) for the five-year term April 1, 2016, to March 31, 2021. The last three years of Phase II of the 2009-2019 Forest Management Plan (FMP), the planning and approval of the 2019-2029 FMP and the implementation of the first two years of the 2019-2029 FMP are included in the scope of this audit. The on-site portion of the audit occurred on September 28-29, 2021, with document examination and interviews taking place prior to, during, and after the on-site period. A risk assessment was conducted prior to the start of the field audit, and it was determined that three optional procedures would need to be examined. NDMNRF's district office in Parry Sound was visited to review documentation pertinent to the consultation process and to interview district staff on October 4th. In addition, a remote interview and sharing of documents was arranged with NDMNRF Regional staff. A visit to Westwind's office was arranged for the following day (October 5th) for interviews and discussion with Westwind's General Manager.

IFAs are governed by eight guiding principles as described in the 2021 Independent Forest Audit Process and Protocol (IFAPP): i) commitment, ii) public consultation and First Nations and Métis community involvement and consultation, iii) forest management planning, iv) plan assessment and implementation, v) system support, vi) monitoring, vii) achievement of management objectives and forest sustainability, and viii) contractual obligations. Findings arise from audit team observations of material non-conformances and the identification of situations in which there is a significant lack of effectiveness in forest management activities. Similarly, the audit team may highlight best practices for the cases where auditees' actions go above and beyond legal requirements and result in positive outcomes for the Forest and communities. The IFA findings will be addressed by the auditees in an IFA action plan.

This report describes the audit team's findings in relation to the eight IFA principles listed above. The purpose of the audit report is to communicate information to both public and

technical audiences. The main body of the report provides a short, plain language summary, whereas Appendices contain more technical audit information. Appendix 1, Audit Findings and Best Practices are designed to facilitate the development of action plans. Reviews of the achievement of objectives and contractual obligations are summarized in Appendices 2 and 3, respectively. More detailed information on the audit process, including the sampling intensity, is provided in Appendix 4. A list of acronyms is presented in Appendix 5. Audit team members and their qualifications are listed in Appendix 6.

3.2 Management Unit Description

The French-Severn Forest is located entirely within the Parry Sound District, in the Southern Region of the NDMNRF. The Forest extends from the eastern shore of Georgian Bay eastward to the boundary of Algonquin Park and the Bancroft-Minden Forest (Figure 1). The Forest is part of the Great Lakes-St. Lawrence Forest Region, which is characterized by deciduous species such as sugar maple, yellow birch, and beech, and coniferous species such as eastern hemlock, eastern white pine, and red pine.



Figure 1. Location of the French-Severn Forest.

Figure 2 illustrates the composition of the Crown portion of the Forest broken up by plan forest units. Over 50% of the Forest is comprised of the tolerant hardwood forest unit where selection

cutting and shelterwood silvicultural systems prevail. The white pine forest unit accounts for approximately 26% of the total productive Crown Forest. Planned harvesting operations in the 2019-2029 FMP are largely done under a partial harvesting system (~90%) which are predominantly naturally regenerated. Harvesting under the selection silvicultural system accounts for 38% of the planned harvest, harvesting under the uniform shelterwood silvicultural system accounts for 49% of the planned harvest and harvesting under the clear cut silvicultural system accounts for 13% of the planned harvest.

Productive Forest by Plan Forest Unit 2019-2029 FSF FMP

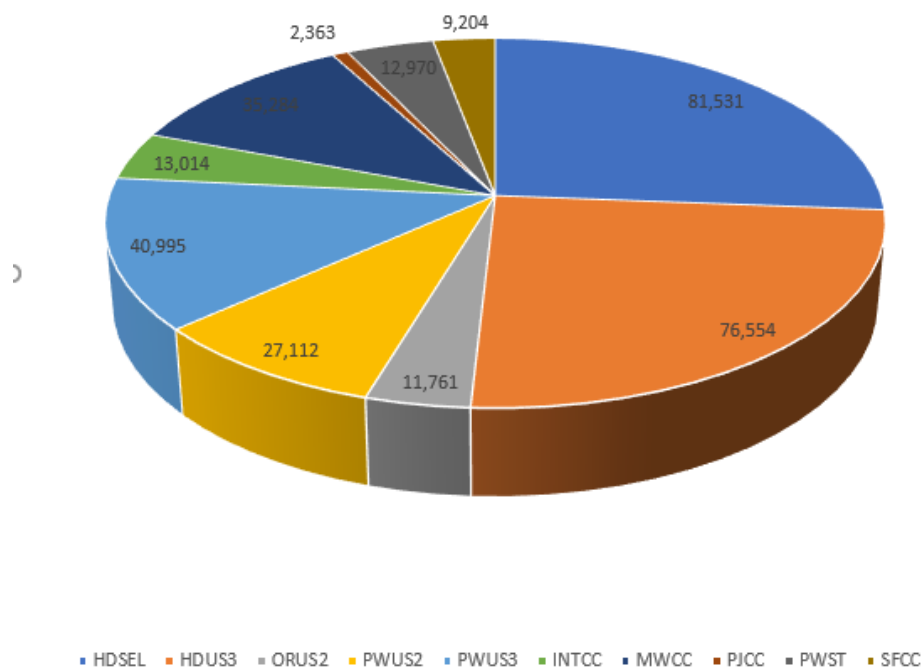


Figure 2. Forest Composition of Crown Portion of Forest-by-Forest Unit (ha). (Source: 2019-2029 French-Severn Forest FMP)³

The major communities located in the Forest are Parry Sound, Huntsville, and Bracebridge. The Forest is easily accessed by two major highways and a variety of municipal, provincial, and

³ HDSEL – Tolerant Hardwoods Selection; HDUS3 - Tolerant Hardwood Shelterwood; ORUS2 - Oak; PWUS2 – White Pine Shelterwood (2-cut), PWUS3 – White Pine Shelterwood (3-cut); INTCC Intolerant Hardwoods; MWCC – Mixedwood; PJCC – Jack Pine; PWST – White Pine Seed Tree; SFCC – Spruce-Fir

private roads. In addition, there are numerous trails (e.g., hiking, snowmobile, all-terrain vehicle, etc.).

The area within the French-Severn Forest boundary exceeds 1.25 million ha. Westwind manages approximately 1/3 of this area (432,475 ha's of managed forested Crown land). The ownership of the management unit is 55% Provincial Crown, 2% Federal and 43% private. (2019-2029 FMP, Table 1)

The Sustainable Forest Licence (SFL #542411) is held by Westwind Forest Stewardship Inc., a not-for-profit, community-based forest management company. Timber is harvested by companies under Overlapping License Agreements with Westwind and Forest Resource Licenses (FRL) issued by NDMNRF. Westwind is governed by an eight-member Board of Directors. The Board positions include three seats for forest industry, four for local communities, and one for an Indigenous representative.

4. AUDIT FINDINGS

4.1 Commitment

The French-Severn Forest is currently Forest Stewardship Council (FSC) certified. The first FSC certificate for the French-Severn Forest was issued in February of 2002, and the certification status has been maintained for almost twenty years.

Given the certification status of the French-Severn Forest, Westwind is exempted from all commitment procedures, as stated in the IFAPP. NDMNRF is responsible for the management of Crown Forests and plays an important role in the certification process. It provides research and develops applicable guides, it monitors the status of species at risk, conducts compliance inspections, supports the consultation process and relationships with First Nations and Métis communities.

4.2 Public consultation and First Nations and Métis community involvement and consultation

4.2.1 The Consultation Process

The Public Consultation process for the 2019-2029 FMP was carried out as required in the 2009 and 2017 FMPMs. During the development of the Plan, NDMNRF sent letters to stakeholders, First Nations and Métis communities for each of the five stages of the consultation process. Documents with written notices were sent to stakeholders as well as the publication of advertisements in local newspapers inviting them to participate in the FMP process. First Nations and Métis communities were sent written notices. Through communications with First Nations, a special open house was held at the Magnetawan First Nation Community, for members of the Henvey Inlet, Magnetawan, Wasauksing and Shawanaga First Nations. The audit team reviewed letters and advertisements, open houses and checked all records pertaining to the consultation process, ensuring they were maintained and properly filed by NDMNRF. All requirements for the public consultation process, as per the relevant FMPM manuals, were met.

4.2.2 Consultation on Annual Work Schedule

Notices and ads for inspections of the Annual Work Schedule (AWS) were issued for each year within the scope of the audit. This was verified by the audit team at the NDMNRF office. Notices and ads for aerial spraying were also published for each year within the scope of the audit. Records are kept at the NDMNRF district office.

In terms of First Nations, their participation was focused on the development of the management plan, with open houses at Magnetawan First Nation specifically for First Nation communities. First Nations did not respond to notices to inspect the Annual Work Schedule. According to NDMNRF, they were more focused on the FMP specifically as it relates to the timing of aerial spraying.

4.2.3 Individual Environmental Assessments (IEA)

The other item of note is the fact that during the development of the 2019-2029 FMP for the French-Severn Forest there were two requests for IEA ('bump-up requests') made, one in the Little Long Lake area and another one in the vicinity of Moon River. These two requests were both rejected by the Ministry of Environment, Conservation and Parks (MECP).

In the case of the Little Long Lake, there was concern over the impact that logging would have on wetlands, beaver habitat, and calcium levels in the lake. NDMNRF provided evidence to demonstrate that there is sufficient protection to the lake afforded by the establishment of AOCs and that in the area, there is only partial harvesting. Records of all interactions with the stakeholder were kept and verified by the audit team. In the case of the Moon River, there was concern expressed over 1) the lack of public consultation, 2) the use of herbicides, and 3) maintenance of branch roads during and after forest operations to allow access for emergency vehicles and to access recreational camps. NDMNRF provided evidence demonstrating the consultation process that took place (the stakeholder who raised this issue was in the mailing list), the process in place for any herbicide application, and that NDMNRF is not required to maintain roads once they have fulfilled their use for forestry operations. Records of all interactions with the stakeholder were maintained and verified by the audit team. No issue resolution process resulted from these concerns.

4.2.4 Overall Audit Outputs

The output of interviews with interested parties indicated a very high level of satisfaction with the way forest management is conducted on the Forest based on the degree of transparency, proactivity of outreach and communication on the part of the licensee, and technical competence, including innovation in terms of testing responses to Beech Bark Disease (BBD).

The audit team heard some relatively minor concerns that do not pertain exclusively to the Forest but may be of broader relevance. Such items include stumpage rates, and the fact that hemlock is priced as if it were in the same category as SPF. This can lead to a reluctance to harvest lower value products, and the importance of charging more appropriate rates has been flagged to NDMNRF. Local Citizens Committee (LCC) members had expressed concern about growth and yield plots not being kept current, with reassurance obtained from NDMNRF on this matter. The challenges of keeping active and full LCC participation were noted, particularly in the context of constraints imposed by COVID-19 and funding (e.g., field trips which are seen as a key engagement tool). Issues are raised and resolved through the LCC process, as summarized through interviews.

The audit team also verified notices and communication regarding AWS and aerial spraying. Notices and ads for the inspection of AWS and for advising of aerial spraying were placed in newspapers for each year of the audit term. The audit team verified these notices and ads were appropriately filed at the Parry Sound District Office. There was no issue resolution process during the audit term.

The audit team concludes that the consultation process fulfills the requirements of the FMPM and was effective in addressing concerns raised by stakeholders.

4.2.5 The Local Citizen's Committee

There has been an active LCC in the French Severn Forest for the development of several forest management plans. 2016 and 2017 brought about relatively significant changes in LCC membership including a change in chair. The terms of reference for the LCC were reviewed and updated clarifying the role of LCC members for the development of the 2019-2029 Forest Management Plan. The LCC members represent a broad constituency including anglers and hunters, municipalities, fur harvesters, naturalists, snowmobilers, tourism operators, waterfront property owners, small independent loggers, mid-size and large operators, and organized labour.

The LCC met on 12 occasions during the planning process, and in fact some time prior to the start of the formal planning process. Some initial meetings date back to February 2015, and extend into September 2018 for the 2019-2029 FMP, including the Desired Forest Benefits meeting, and a review of the Long-Term Management Direction and Draft 2019-2029 Forest Management Plan. The LCC members were provided with training opportunities, as well as two field tours, two formal FMP training sessions and the 2011-2016 Independent Forest Audit report, by way of background. The LCC Chair or designate participated in most Planning Team meetings as well as provided input into the classification of amendments for the 2009-2019 FMP. The audit team found that the LCC involvement in the planning process was effective, as members were engaged in information centres, and produced the LCC Report (included in the 2019-2029 FMP) stating the committee's general agreement with the FMP.

4.2.6 First Nations and Métis Communities Consultation

NDMNRF has a Resources Liaison Specialist responsible for communications with First Nations and Métis communities. Written letters were sent to all indigenous communities at each stage of the development of the 2019-2029 FMP. As a result of these communications, and at the request of some of the First Nations communities, special open houses were held. Six First Nations representatives participated as members of the Planning Team. These individuals were from the Dokis, Magnetawan, Henvey Inlet, Wasauksing, Shawanaga and Wahta Mohawks First Nations. The audit team verified the communication with First Nations was appropriately maintained and filed at the Parry Sound District Office.

The audit team did not receive any feedback from First Nations and Metis communities and discussed this with NDMNRF's Resources Liaison Specialist. It was stated that forestry is not a priority for First Nations in the area given the existence of other projects such as the building expansion of the highway, wind farms, projects related to Species at Risk that are prioritized by each of the communities. Supplementary Documentation C – First Nations and Métis Background Information Reports and Supplementary Documentation D - Summary of First Nations and Métis involvement have been developed but none of the communities agreed to

make any of these documents public. Section 2.3 of the FMP discusses in general terms the communities that prepared a Background Information Report, and how the values identified are protected. The FMP was prepared based on AOCs designed with the participation of the communities (members of the Planning Team) and consistent with the Forest Management Guide for Cultural Heritage Values. The audit team concludes that consultation with First Nations and Métis communities meet the requirements of the FMPM

4.3 Forest management planning

The development of the 2019-2029 FMP was found to have been completed in accordance with the 2009 (LTMD development) and 2017 (Operational Planning) FMPMs. All the mandatory submission deadlines and checkpoint validations were met throughout the planning and LTMD development process. The planning inventory was based on the recently delivered enhanced Forest Resource Inventory (eFRI 2017). Compared to the previous inventory, the 2019-2029 planning composite yielded fewer non-forested areas, increases in areas classified under more productive site classes and a greater abundance of hemlock and oak stands. Harvest allocation have been split between two operational zones to account for difficult road access blocks. In total 13.8% of the allocated harvest has been classified as being within the difficult access zone.

Certain landscape indicators failed to move towards and/or stay within the Simulated Range of Natural Variation (SRNV) when modelling all the LTMD options. The same failures were met when using the Emulation of Natural Disturbances (END) scenario. Key contributing factors to the non-achievement of these targets are the large portion of production forest which is unavailable to forest management activities (~49%) and the limited amount of forest compositional change that can be achieved through a predominantly partial harvesting regime. The unavailable production forest is comprised of Patent lands (420,393 ha's), Provincial Parks and Conservation Reserves (83,081 ha's) and Federal Lands (16,694 ha's) (source: 2019-2029 FMP Table 1). The final LTMD was found to be appropriate for the current forest conditions meeting most of the plan objectives and ensuring the French-Severn Forest is managed in a sustainable manner.

Forty species at risk identified by COSSARO (Committee on the Status of Species at Risk in Ontario) are found in the Forest. While no management strategies are in place in the 2019-2029 FMP to increase the preferred habitat for any species at risk, AOC prescriptions were developed to protect known habitat and SAR (Species at Risk) features. The key guideline is the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (Stand and Site Guide).

The protection of known and utilized habitat is achieved through the implementation of AOC prescriptions as outlined in the Table FMP-11 of the 2019-2029 FMP. As values are identified, AOC prescriptions are developed appropriately for the protection of each value identified consistent with the Stand and Site Guide and the Guide for Cultural Heritage Values. In total the 2019-2029 FMP identifies 78 Operational Prescriptions for Areas of Concern and Conditions

on Roads, Landings, and Forestry Aggregate Pits. Silvicultural Ground Rules (SGRs) and Conditions on Regular Operations (CROs) are well developed and articulated within the FMP and follow the direction provided by the 2017 FMPM and Stand and Site Guide, respectively. The audit team found that related stand-specific documents, such as Forest Operations Prescriptions (FOPs) were well-developed and appropriately implemented in the Forest with highly variable stand-specific conditions. This level of variability is generally not captured through conventional FRI mapping and therefore is often assessed and articulated through FOPs catered to the stand and implemented through Tree Markers under partial harvest silvicultural systems. The SGRs detailed within FMP-4 reflect the highly variable nature of the Great Lakes-St Lawrence Forest generally, and the French-Severn Forest specifically.

In addition to regular SGRs and CROs specific to the Forest, particular attention was given to the threat and challenge of managing for BBD within the FMP development process. A special task team was formed to develop proactive strategies and how best to incorporate this new stress into the FMP including changes to the LTMD, forest unit organization, and yield curves. The proactive approach taken by Westwind to this new threat is well researched, well implemented, and shows a commitment to long-term forest health and sustainability. The proactive measures taken to best control the adverse effects of BBD were observed by the audit team during field visits and this is noted with a Best Practices Finding (see **Best Practice #1**; Appendix 1).

Annual Work Schedules were found to be prepared in a manner that was consistent with the FMP. The AWSs also met the FMPM requirements for access, harvest, renewal, and maintenance operations.

4.4 Plan assessment and implementation

4.4.1 Access

The road network system throughout the French-Severn Forest is extensive, providing continual access to most of the forest throughout the plan term. Road construction, maintenance, and water crossing installations were found to be executed to a high standard. Operational issues were observed on a sample of the viewed aggregate pits (**Finding #2**; Appendix 1). Water crossing removals were found to protect fish habitat while allowing continued public access via All-Terrain Vehicles (ATV). The 2019-2029 FMP stipulates timelines for road responsibility transfer to the NDMNRF which is typically at the end of the plan term. A draft process has been developed by NDMNRF to facilitate a quicker transfer of these road liabilities.

4.4.2 Areas of Concern

During site inspections it was found that AOCs were appropriately identified by tree markers and delineated on the ground. AOCs for protecting water resources (streams, intermittent streams, wetlands), heronries, and stick nests were observed in conformance with the respective AOC prescriptions.

The prescription for the protection of the Blanding's Turtle significantly affects forest operations and conflicts with AOCs for other values. Habitat for Blanding's Turtle includes riparian areas, wetlands, and ponds. The AOCs prescriptions identify modified management zones (MMZ) close to suitable summer habitat where operational activities involving heavy machinery are not permitted at certain times of the year. One of the recommendations from the previous IFA was to establish Beaver meadows/pond habitat. With the changes to the Stand and Site Guide, it is now possible to harvest close to shore in the winter and implement Beaver Pond AOC habitat without negatively affecting Blanding's Turtle habitat. However, there are other factors to consider that include protection of aquatic values, merchantability, and cost implications of harvestable volumes. This issue was discussed with NDMNRF and the Licensee. As a result of the factors discussed above, no opportunities have been identified to create suitable beaver habitat to date. As the Action Plan requires that the Beaver Pond AOC prescription be implemented "where they are able to", the audit team finds the auditees in compliance.

4.4.3 Harvest, Renewal and Maintenance

The level of harvest was well below the allowable harvest area. Only 36% of the planned harvest area was completed during the audit term. Westwind prepares the forest management plan, and the harvest is largely executed by the shareholders. Shareholders and operators followed the FMP, but actualized harvest is based on other considerations (market conditions, price of lumber/wood products, high price of residual values in stumpage, etc.). During the audit term there was a significant increase in lumber demand (and price) which in turn drove up the residual portion of the crown dues which are based on monthly commodity prices. The high cost of residual stumpage payments was a key contributing factor to the low level of actualized harvest during the audit term especially for lower grade timber. There is no differentiation between the residual fees for high- and low-grade timber which significantly impacts the profitability of processing low grade timber volumes.

Five different standards apply to selection harvesting in tolerant hardwoods and are referenced within those SGRs that apply to partial harvest systems. These include a harvest eligibility criterion, which is assessed at the time of the FOP, a tree marking quality standard, a stand improvement standard, a residual stocking standard (all of which are assessed at the time of the tree marking audit), and a logging damage standard, which is assessed at the time of the harvest inspection. Westwind's records show that it conducted all these assessments and met the required standards.

Tree marking standards were only able to be assessed by the audit team after harvest and therefore were limited in scope to retention trees only. Despite this, overall FOP direction and tree marking choice was of a high standard and consistent with the available tree marking audit documentation. Additionally, District NDMNRF staff have conducted tree marking audits as part of its Silvicultural Effectiveness Monitoring (SEM) program. Some instances of marked and

unharvested trees were observed; however, this was minimal and not considered to warrant further inspection by the audit team.

Overall, audit team observations of logging damage and site disturbance were consistently low and well within thresholds described in related CROs from the FMP.

Artificial renewal activities occurred primarily within the Pine shelterwood stands on the Forest. Tree planting and site preparation (SIP) (largely chemical SIP) fluctuated annually throughout the audit term due in large part to the amount of observed natural regeneration following the first harvest stand entry. Overall, the artificial renewal program completed during the audit term was successful, however, it was observed during the field audit that the planting stock used in 2020 was small which contributed to poor regeneration stocking (**Finding #1**; Appendix 1). Most of the FSF is managed under partial cutting systems (Selection and Shelterwood) these stands are primarily renewed naturally and assessed via tree marking audits (selection system) and free-to-grow (FTG) surveys (Shelterwood system). No issues were found with the quality of natural renewal under both silvicultural systems.

4.5 System support

The Forest is FSC-certified and as a result Westwind is exempted from being audited against this Principle. However, issues regarding record keeping by NDMNRF were detected in the 2016 IFA. A recommendation was made under Criteria 5.2 and verified during this audit. The recommendation from the previous audit regarding maintenance of records has been implemented by NDMNRF and was deemed completed in the Status Report. This was verified by the audit team. Records of notices, attendance sheets to open houses, mailing lists, letters to stakeholders for each of the five stages of the FMP development process were observed. NDMNRF also had copies of newspaper clippings, invoices from venues where open houses were held and pictures from open house meetings. The audit team also sampled comments received and the responses from NDMNRF or the licensee, for each of the different stages of the consultation process, including spreadsheets with records of interactions with stakeholders, and very detailed spreadsheets related to the IEA requests. The audit team found NDMNRF in compliance with this requirement.

4.6 Monitoring

4.6.1 Access

NDMNRF undertook a roads inventory and monitoring program in 2017 & 2018. This formal monitoring program was completed as part of a government roads and water crossings infrastructure plan. Further access monitoring was completed in an informal manner by both NDMNRF and the Licensee. A good working relationship exists between both parties allowing

for a fluid transfer of road condition information. Formal monitoring of newly constructed roads and water crossings was achieved through formal forest operation inspections.

4.6.2 Harvest and Renewal

Harvesting is largely completed by the FSF shareholders who in certain cases engage harvest contractors to complete the work. Tree marking is the responsibility of the harvest contractors who are held accountable by Westwind's staff. SEM monitoring was completed by the Licensee and NDMNRF meeting their respective survey targets throughout the audit term. A marked improvement was noted in NDMNRF's SEM effort compared to the previous IFA. The positive relationship between the NDMNRF and Licensee facilitated a productive exchange of survey findings. Westwind has implemented an iterative SEM approach for stands managed under the shelterwood system. These stands are visited several times following the initial entry to determine if artificial silviculture treatments are required and if subsequent tending should be prescribed. Westwind had developed a custom application for the completion of tree marking surveys for stands managed under a selection system. Tree marking contractors are provided with immediate feedback on their work and tree marking issues (if they occur) can be addressed prior to the start of harvesting operations. Compliance monitoring targets were met by both the Licensee and NDMNRF throughout the audit term. Very few instances of non-compliance were reported. While the NDMNRF demonstrated a significant improvement in meeting their monitoring obligation it was noted that a lack of staff succession planning exists within the organization.

4.6.3 Annual Reporting

Annual reporting obligations were met by Westwind throughout the audit term. The annual reports (ARs), particularly the 2019–2020 year-10 AR, provided good contextual information related to the achievement of management objectives. However, it was noted that there were some data accuracy issues related to reported levels of renewal in the Year-10 AR when compared to the original AR text, tables, and spatial data. NDMNRF confirmed that they do not complete quality control or quality assurance of the submitted AR spatial datasets (**Finding #3**; Appendix 1).

4.7 Achievement of management objectives and forest sustainability

Observations by the audit team through field observations, document reviews, and interviews were consistent with the Year 10 Annual Report of Objective Achievement documentation. The planned and Available Harvest Area (AHA) when compared against actual harvest level showed significant under-utilization (36% of planned). This under-utilization of the AHA impacts several of the objectives and indicators, however analysis of management activities by Westwind

within the audit period demonstrates ample attempts and effort to meet these benchmarks under several restrictions. As expected, these restrictions are largely outside the control of Licensee, and affect achievement of social, economic, and ecological objectives (Appendix 2).

Achievement of the management objectives within the Forest is well articulated through the ARs and year-10 AR. Of specific note, many of the indicators of sustainability outlined within the AR are highly influenced by the eFRI used in the 2019-2029 FMP. Primarily, this new eFRI produced a finer-scale resolution that significantly changed the recorded summary of many values that are more uncommon or incidental on the land base. This can be seen clearly through the increased reporting of red oak as well as hemlock forest areas in the current versus previous planning period.

The primary outstanding shortcoming observed within review of AR reports was implementation of enhancing beaver habitat. As noted in the 2016 IFA, as well as SFL documentation, the release of the new direction within the Stand and Site Guide with the associated restrictions on Blanding's Turtle habitat have overshadowed a host of objectives and sustainability indicators.

Challenges exist in meeting disturbance pattern targets which resemble the expected natural disturbance template. These same challenges were met during the plan development and modelling phases which met similar shortcomings under all LTMD and end scenarios. Partial harvesting has a limited impact on shifting disturbance patterns on the landscape. Only a fraction of the forest is managed under a clear-cut system.

In total, 82.5% of the areas harvested during the 2009-2019 FMP were declared Free to Grow (FTG) or established. Progress is being made in surveying the balance of these areas which consist primarily of shelterwood and clear-cut managed stands.

Table 2 summarizes the areas surveyed during the audit period. The survey results are showing that plan forest unit transitions are in line with the assigned SGR's and modeling assumptions.

Table 2 Summary of FTG areas surveyed during the audit term (2016-2021)

Forest Unit (FU)⁴	Disturbance FU Area (Ha)	Target FU Area (Ha)	FTG FU Area (Ha)
HDSEL	6041.2	6041.2	6062.9
HDUS	865.9	865.9	865.9
HDUS3	279.8	279.8	258.1
HESEL	115.2	115.2	115.2

⁴ HDSEL – Tolerant Hardwoods Selection; HDUS – Tolerant Hardwood Shelterwood; HDUS3 – Tolerant Hardwood Shelterwood (3-cut); INTCC – Intolerant Hardwood; MWCC – Mixedwoods; PWUS White Pine Shelterwood; PWUS2 – White Pine Shelterwood (2-cut); PWUS3 – White Pine Shelterwood (3-cut).

<i>INTCC</i>	12.2	0.0	0.0
<i>MWCC</i>	52.1	64.3	64.3
<i>PWUS</i>	238.9	359.7	136.1
<i>PWUS2</i>	120.8	0.0	223.7
<i>PWUS3</i>	42.2	42.2	42.2
<i>Total</i>	7,768.41	7,768.37	7,768.37

3.8 Contractual obligations

Westwind met all contractual obligations under its Sustainable Forest License. This was assessed through the review of several documents and evidence compiled throughout the audit term including: forest operational compliance history, stumpage payment summaries, plan objective achievements, SEM program summaries and interviews with stakeholders. Appendix 3 provides a more detailed assessment of Westwind's performance in meeting its contractual obligations.

5. CONCLUDING STATEMENT

The Independent Forest Audit is guided by eight guiding principles as listed below. Westwind's proactive approach in response to BBD was identified as a best practice.

1. Commitment

The commitment principle is deemed to be met since the French-Severn Forest is certified under the FSC certification standard and NDMNRF is responsible for Crown Forests providing technical support and forest management oversight. While the FSC certification does exempt the certificate holder (Westwind) from this principal the same does not apply to NDMNRF. NDMNRF was found to have met the requirements of this principal.

2. Public consultation and First Nations and Métis community involvement and consultation

Westwind's forest management planning, public consultation and Indigenous community engagement met the requirements of the FMPM and was effective. NDMNRF has supported the LCC and the public consultation process and has been engaged with First Nations and Métis communities.

Westwind is an important contributor to the economic and social life of the communities and rural areas of the French-Severn Forest. It has demonstrated appropriate support for regional training initiatives and is very supportive of community institutions and development projects. Westwind staff are aware of Indigenous rights, the communities affected by forest management and over the years have built good relationships and included representatives in

Westwind's planning team and Board of Directors.

3. Forest Management Planning

Forest management planning was carried out in accordance with legal requirements. The recommendation from the previous audit regarding the development of an AOC prescription for Beaver Pond has been completed by NDMNRF and included in the 2019-2029 FMP. The AOC has not been implemented as NDMNRF and the Licensee have not identified sites where the Beaver Pond AOC can be implemented.

4. Plan Assessment and Implementation

The audit team found the implemented management practices were consistent with the FMP. Roads and water crossings on active roads were constructed and maintained to a high standard. Harvest and renewal operations were also implemented to a high standard and according to the forest management plan.

There are two findings under Principle 4. Finding 1 is related to low level of seedlings survival. The key reason for the low survival is that the seedlings provided in 2020 were undersized. Finding 2 is related to a forestry aggregate pit located on the North Pickerel Road that did not meet all the operational standards outlined in section 4.2.2.4 in the 2019-2029 FMP (banks not properly sloped and no 5-metre setback for the trees).

5. System Support

Westwind and NDMNRF have dedicated and professional staff with sufficient systems support to ensure plan objectives and contractual obligations are being met. A recommendation from the previous audit regarding public consultation documentation was implemented and verified as completed by the audit team.

6. Monitoring

Access Road inventory and monitoring was undertaken in 2017-2018 as part of the government's infrastructure plan. Monitoring also occurred regularly as part of forest compliance program. SEM monitoring was completed by the Licensee and NDMNRF meeting their respective survey targets throughout the audit term. A marked improvement was noted in NDMNRF's SEM effort compared to the previous IFA.

Annual reporting obligations were met by Westwind throughout the audit term. Several inaccuracies were noted related to reported levels of renewal in the year-10 AR and the data and the original ARs.

7. Achievement of Management Objectives and Forest Sustainability

Most forest management objectives are being met. Harvest utilization levels continue to be below planned levels due to market conditions. Forest sustainability is being met. As noted, the 2018-19 year-10 AR was found to have some data accuracy issues related to the compiled renewal operations that took place during the 2009-2019 plan period. That resulted in Finding #3.

8. Contractual Obligations

Westwind met its license obligations. Appendix 3 breaks down the performance under each obligation.

5.1 Conclusion

The audit team concludes that management of the French-Severn 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 Westwind Forest Stewardship Inc. Forest sustainability is being achieved, as assessed through the Independent Forest Audit Process and Protocol.

APPENDIX 1. FINDINGS AND BEST PRACTICES

Independent Forest Audit – Record of finding
Finding #1
<p>Principle: Principle 4</p> <p>Audit Criterion: Criteria 4.4: Renewal</p> <p>This audit criterion addresses renewal operations (site preparation and regeneration) outside of Areas of Concern (AOCs). Both low complexity (normally associated with slash pile burning) and high complexity prescribed burns are included. Renewal operations must be conducted in compliance with all laws and regulations including the Crown Forest Sustainability Act (CFSa), approved activities of the Forest Management Plan (FMP) including Silvicultural Ground Rules (SGRs), Annual Work Schedule (AWS), and Forest Operation Prescriptions (FOPs).</p> <p>Procedure(s):</p> <p>Review and assess in the field the implementation of approved renewal operations. Include the following:</p> <ul style="list-style-type: none"> • select a representative sample from those areas where operations have been conducted during the audit period, from each of the years being audited, and for each type of regeneration and site preparation operation across a range of forest and site types (to provide for assessing the effectiveness of renewal prescriptions), including any exception prescriptions implemented. <ul style="list-style-type: none"> ○ include, as part of this sample, the 10% sample required of audit criterion 8.1.11 for the specific year of the Forest Renewal Trust (FRT) expenditures or, if applicable, audit criterion 8.2.4 for the Special Purpose Account (SPA).
<p>Background information and summary of evidence:</p> <p>During the field audit numerous planting sites were visited primarily within Pine shelterwood cuts (seeding and final removals). A sample of sites planted throughout all the years in the audit period (2016-2020) was selected to assess the program’s success within each year.</p> <p>Two sites were found to have low levels of seedling survival (MOWROY6 & BLRFRY3). MOWROY6 was shelterwood final cut while BLRFRY3 was a combination of a shelterwood seed cut and a strip cut. Extensive pre- and post-harvest monitoring was completed by Westwind staff with appropriate chemical site preparation treatments applied to both sites. Each site was planted during the 2020 season. Post-planting quality assessments were completed on both sites by the planting contractor and no major issues were flagged. Overall planting quality for the 2020 contract was 92.2%.</p> <p>Westwind acknowledged that a switch in seedling growers was made in 2019 as the grower was unable to guarantee growing space for their program. A switch to a new grower was</p>

made; however, a formal contract was not put in place nor was there any requirement for seedling testing. The seedling stock delivered for the 2020 plant was determined to be very small due to COVID-19 related reasons (i.e., COVID-19 protocols and staffing isolation resulted in a delayed start to planting). No further rationale on the root cause of the small seedlings was provided. Given the investments made in chemical site preparation the year prior it was decided that the undergrown seedlings would be planted.

During the 2020 growing season only 105,000 of the 400,000 seedlings were acceptable for planting in the subsequent year. This was due to those seedlings not meeting the minimum height requirements stipulated in the contract.

Discussion: A review of the work completed by Westwind throughout the pre- and post-harvest stages on these stands found their assessment of the site conditions and subsequent silvicultural prescriptions to be acceptable and in line with the SGRs and strategic direction of the FMP. Monitoring was completed at acceptable intervals to determine the need for any remedial and follow up silvicultural activities. It is the opinion of the audit team that the seedling status for the 2020 planting was a significant contributor to the low stocking observed during the field audit. The audit team understands the mitigating circumstances which led to switching seedling growing contractors however the root cause for the undergrown seedlings remains unclear.

Further adherence to strict seedling specification has since been put in place through a formal contract with the new grower. Approximately 75% of the seedling stock grown for the 2021 season was rejected due to insufficient height.

Conclusion: It is the conclusion of the audit team that the largest contributing factor to the low observed success of the 2020 planting in Pine shelterwood stands was the insufficiently sized seedling stock

Finding: Tree planting in Pine shelterwood cuts completed during the 2020 season was found to have reduced levels of success.

Independent Forest Audit – Record of finding

Finding # 2

Principle: Principle 4 - Plan assessment and implementation

Audit Criterion: Criteria 4.7: Access - Road construction and decommissioning, various types of water crossings including crossing structures, road monitoring, maintenance, aggregates, and any other access activities must be conducted in compliance with all laws and regulations, including the CFSA, approved activities of the FMP, and submission of, or revisions to, the AWS (2020 Forest Management Planning Manual (FMPM)).

Procedure(s):

Review and assess in the field the implementation of approved access activities. Include the following:

- select a representative sample from those areas where operations have been conducted during the audit period, from each of the years being audited, and for each type of access activity (road construction and/or decommissioning, various types of water crossings - winter, culverts, bridges, road maintenance, construction and/or removal) from primary, branch and operational roads constructed, including forestry aggregate pits for new roads and existing roads;
- an examination of aerial photographs, Forest Operations Information Program (FOIP) reports, annual report information, including maps, for these operations;
- determine whether identified conditions on roads, landings and forestry aggregate pits have been conducted in accordance with the approved FMP for important ecological features; and

Background information and summary of evidence:

A forestry aggregate pit located on the North Pickerel Road did not meet all the operational standards outlined in section 4.2.2.4 in the 2019-2029 FMP. The following standards were not met:

4.2.2.4 Operational Standards for Forestry Aggregate Pits:

- *When the site is inactive, all pit faces must be sloped to a stable angle of repose*
- *All trees within 5 metres of the excavation face must be removed*
- *Aggregate material must not be removed from an area of concern or within 15 metres of the boundary of an area of concern*

At the time of the site visit (September 28th, 2021) the aggregate pit was not actively being used. Interviews with Westwind staff determined that this forestry aggregate pit was primarily used as a source of winter sand and was not a primary source of aggregate during the snow free months.

A 5-metre tree clearing distance from the pit wall edge was not established and in certain areas the pit walls were undercut. The pit walls were not sloped to a stable angle of repose during the inactive period. It was also observed that several Bank Swallow nests had been established along the vertical pit wall section of the forestry aggregate pit. This was confirmed by the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF) District Management Biologist during the field audit who indicated that the nests were not currently inhabited however they were likely active earlier in the year.

The presence of these nests was not known to the NDMNRF and therefore AOC ID: BKS (FMP Table 11) was not applied to this value. The following modified management zone applies to Bank Swallow nest when they are found in an aggregate extraction area:

MMZ1 (0-10m):

- *No operations associated with aggregate pits is permitted**

MMZ2 (10-25m):

- *No high or moderate impact operations associated with aggregate pits is permitted from May 1 to July 31**

MMZ3 (25-50m):

- *No high impact operations associated with aggregate pits is permitted from May 1 to July 31**

**Unless required for safety reasons or environmental protection, or in extraordinary circumstances as specifically identified and justified through an AWS or AWS Revision.*



Figure 3 - Minimum tree clearing distance not met (5-meters)



Figure 4 - Bank undercut and trees not cleared to minimum distance



Figure 5 - Bank swallow nest identified on vertical pit wall

Conclusion: Aggregate pit viewed on North Pickerel Road did not conform the operational standards outlined in the FMP.

Finding: The mandatory operational requirements for Forest Aggregate Pits were not fully implemented on all the sites viewed during the field audit.

Independent Forest Audit – Record of finding

Finding # 3

Principle: Principle 7: Achievement of management objectives and forest sustainability

Audit Criterion: Criteria 7.1 Year seven and year ten annual reports (AR) (2009 FMPM) and/or year five and final-year annual reports (2017 and 2020 FMPM)

Procedure(s):

1. Implementation of forest operations:

- examine the relevant annual reports for the audit period and assess whether the tables, text, maps, and digital information represent an accurate and complete compilation of information contained in previous annual reports for the FMP period. For those items not covered by subsequent procedures in this audit criterion assess whether the report has been prepared in accordance with the applicable FMPM requirements. Determine whether the associated deadlines have been met.

2. Analysis of forest disturbances:

- examine the tables and text related to the analysis of forest disturbances to determine whether it accurately quantifies the size and frequency of disturbances and if it describes progress towards completion of planned forest disturbances, assesses the implications on the achievement of desired landscape pattern and provides any recommendations for consideration in future disturbance planning. Assess whether this analysis is reasonable.

3. Analysis of renewal and tending/silvicultural activities:

- determine whether the tables and text include an analysis of renewal and tending activities conducted during the plan term and whether it includes a discussion of the number of operations to date, expenditures, silvicultural effectiveness (silviculture success – desired forest unit and regeneration success – another forest unit) and harvest/regeneration trends. Assess whether the review includes recommended changes that may affect future effectiveness and expenditures. The effectiveness of silvicultural treatment packages that are exceptions to the forest management guides should also be assessed in the text;
- assess whether the analysis and conclusions are logical based on field evidence, records of information, models, and analyses and whether the analysis and conclusions were carried forward into the new FMP; and
- review the analysis of silviculture activities (2017 FMPM and 2020 FMPM) for any implications to forest level objectives.

4. Review of assumptions in modelling:

determine whether a review of the assumptions used in the development of the long-term strategic/management direction was completed and if it included observations, conclusions or

recommendations for modifications or refinements. Determine whether required adjustments to the assumptions were made in FMP development.

Background information and summary of evidence:

During the review of the 2018-19 Year 10 AR some errors were noted related to the stated level of renewal operations that took place during the term. A sample of reported activities in the Year 10 AR was cross referenced to the original Annual Report text, tables, and spatial data. The following errors were noted based on the sample reviewed:

- The year 10 AR states the 2016 planting program treated 548 ha's with 749,200 seedlings. But the original 2016-17 AR lists the total area as 687 ha's with the 779,200 seedlings. Also, the 2016-17 spatial data for regeneration treatments has a total of 573 ha's for planting.
- The year 10 AR states the 2017 planting program treated 304 ha's while the 2017-18 AR and spatial data show that 240 ha's were planted.
- Table AR-9 - *Summary of Planned and Actual Renewal, Tending and Protection Operations* shows that 470 ha's were declared as being naturally regenerated under the clear-cut silvicultural system during Phase II of the 2009-2019 FMP. No discussion was included in the year 10 AR text about these areas. Westwind staff confirmed that the total reported area was missing the clear cut naturally regenerated areas from the first two years of the Phase II term (2015 & 2016). A review of the submitted spatial layers for the 2016, 2017 & 2018 ARs found that no areas were declared as being naturally regenerated under the clear-cut silvicultural system.

Follow up interviews with District NDMNRF staff confirmed that they do not conduct a formal quality control of the submitted spatial layers in comparison the numbers listed in the AR text and tables.

Conclusion: Data accuracy issues were identified in the 2018-19-year 10 AR when compared to the previously submitted annual reports and spatial data. The Sustainable Forest License (SFL's) and Ministry's (Quality Assurance/Quality Control) QA/QC measures in place at the time of submission and review were not adequate to identify these errors.

Finding: The 2018-19 Year-10 annual report was found to have some data accuracy issues related to the compiled renewal operations that took place during the 2009-2019 plan period.

Independent Forest Audit – Record of finding
Best Practice # 1
<p>Principle: Principle 4: Plan Assessment and Implementation</p> <p>Audit Criterion: 4.5 Tending and Protection</p> <p>Procedure(s): Review and assess in the field the implementation of approved tending and protection operations. Include the following:</p> <ul style="list-style-type: none"> • select a representative sample from those areas where operations have been conducted during the audit period, from each of the years being audited, and for each of the various types of tending and protection operations across a range of forest and site types, including any SFL Class Z lands and any exception prescriptions implemented; • include, as part of this sample, the 10% sample required of audit criterion 8.1.11 for the specific year of the FRT expenditures or, if applicable, audit criterion 8.2.4 for the SPA. • determine whether the tending and protection operations implemented were consistent with the locations in the approved FMP, AWS and the requirements for aerial herbicide and insecticide projects (e.g., pesticide, timing, buffer zones, posting areas); • assess whether the tending and protection treatments were consistent with the FOP; the FOP was consistent with the SGRs; the FOP certified by a Registered Professional Forester (R.P.F.) or other qualified individual, and actual operations were appropriate and effective for the actual site conditions encountered;
<p>Background information and summary of evidence:</p> <p>During the field audit Beech Bark Disease (BBD) was noticed at audit stops 12 and 13. BBD was also noticed as an emerging issue during the previous Independent Forest Audit (IFA). Through the field audit and conversations with Westwind there was evidence and noticeable signs of treatment. Treatment has included Basal Bark (an application of herbicide to the bark around the base of the tree) on smaller stems, and Hack & Squirt (where small incisions are made with a bladed instrument to roughly ½ of the circumference of the stem and treated with herbicide) on larger stems.</p>



Figure 6 - Example of Beech Bark scales noticed during field visit

Discussion: Basal Bark treatment for smaller stems and Hack & Squirt treatment for larger stems is right in-line with current research and up-to-date methods for treatment using triclopyr-based formulations generally in pre-mixed oil-based applications using handheld equipment. Conversations with Westwind revealed that approximately 20% of the funding for these treatment activities is derived from the Renewal Trust Fund (2018). Other FMUs that are dealing with comparable diseases/pests (e.g., Spruce Budworm) are not required to finance treatment through the Renewal Trust Fund. This demonstrates that the auditee recognizes the significant threat of BBD and is going above and beyond in the implementation of treatment. Westwind Stewardship Inc. has been a driving force in leading the fight against BBD. Since 2014 they have undertaken the organization of an expert panel to facilitate best approaches in managing BBD. A trial was completed from 2015-16 to assess various potential treatments. These results were used to identify the most viable BBD management options.

Best Practice: The current method and implementation of treatment for Beech Bark Disease is in-line with recent research and practices.

APPENDIX 2. MANAGEMENT OBJECTIVES TABLES

Table 3. Summary of the status of the 2009-19 FMP Objective 1 - Forest Diversity: natural landscape pattern and distribution

Objectives	Auditor Assessment	Auditor Comments
Move toward a distribution of disturbances that more closely resembles the expected natural disturbance template.	Partially achieved	The achievement of the natural disturbance template for all the size classes was not possible due to several factors including the existing forest condition at the start of the plan term, the amount of productive forest which cannot be managed and the limited impact that partial harvesting systems has on the forest landscape (see section 4.3, pg. 12).
Manage and protect known white-tailed deer habitat on Crown land.	Achieved	Targets regarding Critical Thermal Cover (conifer) have been met for the deer yards identified. Harvesting of conifer was less than expected. The new 2019-2029 FMP identifies two large deer wintering areas, and these are referred to as deer emphasis areas (DEAs) and managed according to the plan.
Maintain a Crown Forest landscape that provides suitable white tailed deer summer range.	Achieved	The target of maintaining 10-15% of Crown land as summer deer habitat has been met and includes openings, clearings, fields, and early succession forest lands
Protect and manage pileated woodpecker feeding, nesting, and roosting habitat.	Achieved	Examples of retention tree choice within partial harvest hardwood blocks consistently demonstrated priority given to pileated woodpecker nest cavities following established tree marking direction (FMP Table 11). The target for pileated woodpecker habitat was a reduction of less than 7.5%. At plan end the reduction was of 7%. The target has been met. The AOC planning and compliance combined with the under harvest will achieve this objective. AOCs have been appropriately implemented
Manage for preferred and suitable, red-shouldered hawk nesting habitat.	Achieved	Current modelling indicates the maintenance of 111% of habitat

		being maintained by the end of the plan. AOCs prescriptions have been appropriately implemented
Maintain a Crown Forest landscape that provides suitable moose summer and winter range.	Achieved	Less harvesting in conifer resulted in a smaller than planned reduction in winter habitat while the harvesting levels were less affected in hardwoods still providing browse material.
Provide old growth forest areas of even-aged forest types, consistent with the requirements of the Old Growth Policy.	Achieved	Old growth targets are being met and under harvest enhanced this objective performance. Targets included maintaining within +/- 10% of current measures, the distribution and pattern elements of landscape metrics for old growth areas. One of the measures was maintaining core areas of old growth within +/- 10% and this measure has been exceeded.

Table 4. Summary of the status of the 2009-19 FMP Objective 2 - Forest Diversity: forest structure, composition, and abundance

Objectives	Auditor Assessment	Auditor Comments
Provide red and white pine forest area not less than 1996 levels, consistent with Conservation Strategy for Old Growth Red and White Pine Forests Ecosystems.	Achieved	Harvest and tending methods are enhancing pine regeneration. New inventory resulted in large increase of pine forest area. Area of pine forest exceeds target but given the new inventories those policy targets are not longer relevant.
Provide red oak forest area at a level not less than 2009 Planning Inventory levels.	Achieved	Harvest and tending methods are protecting red oak regeneration. New inventory resulted in an increase in red oak forest that exceeded the 2009 target levels.
Provide hemlock forest area at a level not less than 2009 Planning Inventory levels.	Achieved	Harvest and tending methods are protecting and enhancing hemlock regeneration and conservation, exceeding target levels. Revised eFRI data in the current FMP have enhanced this forest unit due to its intermittent landscape representation. Reviewed FOPs

		further reflect adherence to this objective.
Provide young forest (pre-sapling - clear-cut forest units) over time to provide browse conditions for wildlife species over 100-year term.	Partially Achieved	Planned levels match this objective but under-harvest reduces the likelihood of achieving this objective at expected levels over the 100-year term.
To provide for even-aged mature forest areas that provides cover, feed, and nesting conditions to wildlife species through nonspatial projections over 100 years.	Achieved	Planned levels match this objective and under-harvest enhances the likelihood of achieving this objective.
To provide for even-aged old forest or overmature areas that provides habitat for species that prefer the old growth conditions.	Achieved	Planned levels match this objective and under harvest enhances the likelihood of achieving this objective. All Desirable Levels and Targets are met for all planning terms over 100 years (2018-19 AR table 16).

Table 5. Summary of the status of the 2009-19 FMP Objective 3 - Forest diversity: habitat for animal life

Objectives	Auditor Assessment	Auditor Comments
To maintain wildlife habitat for species dependent on over-mature forest conditions on the French-Severn Forest.	Achieved	Targets laid out in the LTMD have been met for all planning terms over 100 years. Harvesting levels are also below planned and with few stand-replacing disturbances the achievement level is higher than planned.
To maintain wildlife habitat for forest-dependent provincially and locally featured species on the French-Severn Forest.	Achieved	All provincially and locally featured wildlife species meet the desirable levels and targets for all planning terms over 100 years. Given the low level of harvesting, targets for species dependent on overmature forests have a higher level of achievement.
To increase the amount of early successional shoreline forest habitat to enhance beaver habitat with resulting direct and indirect benefits to other species over time.	Not achieved	The beaver pond AOC prescription supporting this objective has not been implemented. This will eventually result in a loss of suitable Blanding's Turtle habitat through a decrease in beaver populations/beaver ponds over the medium to long-term. An

		amendment to the Stand and Site Guide (January 2016) now allows for winter harvesting within the Blanding's turtle AOC. The challenges in implementing the Beaver AOC include the protection of aquatic/fisheries values, and operational and costs considerations of harvestable volume and merchantability, NDMNRF needs to monitor the effectiveness of the amendment regarding the maintenance of beaver habitat.
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Table 6. Summary of the status of the 2009-19 FMP Objective 4 - Social and economic: community well-being

Objectives	Auditor Assessment	Auditor Comments
To ensure that enough roads (not exceeding 1.26 km/km ²) are in place to allow for effective and efficient forest operations while also limiting company and ministry liability for roads that are no longer required.	Achieved	Westwind and the NDMNRF worked in a collaborative manner to ensure that roads networks were properly maintained. NDMNRF undertook a significant roads liability monitoring program in 2018-19.

Table 7. Summary of the status of the 2009-19 FMP Objective 5 - Silviculture

Objectives	Auditor Assessment	Auditor Comments
To ensure the successful renewal of harvested stands.	Achieved	Westwind's renewal program was found to be well executed with sufficient monitoring to identify any required remedial intervention.
To improve the health and quality of harvested stands.	Achieved	The company administers an excellent reforestation program. A concerted effort has been undertaken to mitigate the impacts of BBD on forest health (Best Practice #1).
To continue to research, test, and implement viable economic and	Achieved	Chemical tending is limited to a small proportion of the FSF.

ecologically based alternatives for forest maintenance which will reduce dependence on herbicides.		Other than BBD treatments in selection FU, only shelterwood and clear-cut managed stands are subject to regular chemical tending treatments. Westwind has an effective SEM program that ensures that chemical treatments are only used when needed. All the implemented tending activities were determined to be viable economical and ecologically based alternatives.
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Table 8. Summary of the status of the 2009-19 FMP Objective 6 - Forest Diversity: values dependent on the Crown Forest

Objectives	Auditor Assessment	Auditor Comments
To maintain wildlife habitat for forest-dependent, wildlife species at risk with known occurrence in the French-Severn Forest.	Achieved	The full implementation of the LTMD ensures meeting the targets of this objectives. The underachievement of harvesting area targets further contributes to these targets since they are dependant on maintaining mature hardwood forests.

Table 9. Summary of the status of the 2009-19 FMP Objective 7 - Social and economic: healthy forest ecosystems

Objectives	Auditor Assessment	Auditor Comments
Implement forest operations in a manner that minimizes conflicts.	Achieved	No conflicts of a significant nature occurred during the audit term.

Table 10. Summary of the status of the 2009-19 FMP Objective 8 - Social and economic: harvest levels and community well-being

Objectives	Auditor Assessment	Auditor Comments
Over the long term, maintain the available harvest area at a level that supports current utilization demands.	Achieved	The plan makes sustainable harvest available, but market and other conditions may not be able to take advantage of this availability.
In the short term, provide a balanced distribution of available harvest area by forest unit.	Achieved	As above, note balanced allocations (See Year-10 AR, AR 16). This objective is well-realized.
Over the long-term, maintain the available harvest volume at a level that supports current utilization demands.	Achieved	The plan makes sustainable harvest available that supports current utilization levels, but market and other conditions may not be able to take advantage of this availability.

Table 11. Summary of the status of the 2009-19 FMP Objective 9 - Social and economic: community well-being

Objectives	Auditor Assessment	Auditor Comments
To minimize the impact for forest operations on cultural heritage values.	Achieved	Operations do follow cultural and heritage values guidelines. There were no instances of non-compliance with respect to cultural heritage values.
Over the short term (first ten years), the utilization level by mill should be reflective of Current Industrial Demand levels as determined by NDMNRF through such methods as the Ministry Recognized Operating Levels and other Ministerial wood commitments.	Not Achieved	Actualized harvested levels are well below the allowable harvest allocations prescribed in the plan. This is largely a function of market demand and regional processing capacity throughout the audit term. Further compounding this problem is the spike in lumber prices at the end of the audit term which raised residual stumpage charges on low value timber. The Licensee and

		NDMNRF have limited control over the achievement of this objective
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Table 12. Summary of the status of the 2009-19 FMP Objective 10 - Social and economic: healthy forest ecosystems

Objectives	Auditor Assessment	Auditor Comments
To undertake all forest management operations using sound environmental practices.	Achieved	All mitigation measures were properly implemented.

Table 13. Summary of the status of the 2009-19 FMP Objective 11 - Habitat for animal life

Objectives	Auditor Assessment	Auditor Comments
To ensure the maintenance of riparian zones, water quality and habitat for fisheries resources adjacent to water bodies where forest management activities occur.	Achieved	All riparian AOCs and buffers investigated in the field were adequate for the protection of shorelines, water quality and fisheries resources.

Table 14. Summary of the status of the 2009-19 FMP Objective 12 - Social and economic: community well-being

Objectives	Auditor Assessment	Auditor Comments
Maintain the area of Managed Crown Productive Forest available for timber production at the highest possible level by minimizing the conversion of managed crown forest area to non-forest land.	Achieved	The Licensee does not engage in forest conversion practices and minimizes its roads and landings footprints within the FMU.
To provide opportunities for First Nation involvement in forest management planning activities.	Achieved	The Company makes opportunities available and has excellent working relations with local Indigenous and Métis communities. The planning team included 6 First Nations representatives.

To encourage and support the participation of the Local Citizens Committee in the development of the Forest Management Plan for the French-Severn Forest.	Achieved	The Company excels at community engagement and transparency. This was confirmed through extensive document review and interviews by the audit team. The planning team included the Chair of the LCC.
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Table 15. Summary of the status of the 2009-19 FMP Objective 13 - Social and economic: healthy forest ecosystems

Objectives	Auditor Assessment	Auditor Comments
To improve forest operations compliance for the French-Severn Forest.	Achieved	Compliance rates (1.4 average annual incidences of non-compliance) as measured by the Licensee and observed by the audit team met this objective. NDMNRF showed a significant improvement in their meeting of compliance plan targets.

APPENDIX 3. COMPLIANCE WITH CONTRACTUAL OBLIGATIONS

The following table provides the contractual obligations of Westwind to the Crown as stipulated in the SFL (#542411). Each condition is provided on a separate row with comments by the audit team to report on the degree of attainment of the condition

*Table 16. Contractual obligations of Westwind to the Crown as stipulated in SFL (#542411)
French-Severn Forest*

Obligation	Manager Performance
Payment of Forestry Futures and Ontario Crown charges.	All required Crown dues have been paid.
Wood supply commitments and overlapping licences.	The Licensee and its shareholders have followed their commitments. There are ample opportunities for proponents to source timber outside of the Memorandum of Agreement (MOA) process given the current and historical utilization rates on the forest.
Preparation of FMP, AWS reports, abiding by the FMP and all other requirements of the FMPM and CFSA.	All planning requirements were met on time.
Conduct inventories, surveys, tests, and studies; provision and collection of information in accordance with FIM.	The Licensee completed the required surveys and provided data consistent with FIM.
Natural disturbance and salvage SFL conditions must be followed.	There were no salvage operations during the audit period.
Wasteful practices not to be committed.	No wasteful practices were identified during the audit term.
Protection of the licence area from pest damage, participation in pest control programs.	The Licensee staff are aware, monitoring the Beech Bark Disease and implementing proactive measures to manage the outbreak and the resulting impact on the Forest.
Withdrawals from licence area.	There were no withdrawals during the audit term.
Audit action plan and status report.	The Licensee developed an action plan and status report and met all requirements.
Payment of forest renewal charges to Forest Renewal Trust (FRT).	The FRT is up to date and minimum balance was maintained as per license requirements.
Sub-accounts of FRT.	There are no FRT sub-accounts.
FRT eligible silviculture work.	All work inspected in the field that was billed to the FRT was found to be eligible silvicultural work.

FRT forest renewal charge analysis.	The Licensee produced a renewal rate analysis that was found to be in accordance with SFL Paragraph 12.3 and which was accepted by NDMNRF.
FRT Account minimum balance.	The FRT account met the minimum balance required by SFL Appendix 'D' in each of the five years.
Record keeping and audit (FRT).	The Licensee provided proper silvicultural records for each of the activities selected for field audit and was able to produce additional records promptly on request.
Silviculture standards and assessment program.	The FMP/SGRs contain a set of silvicultural standards that were produced in accordance with the silvicultural guides and the company has a silvicultural assessment program that meets the requirements of Silvicultural Effectiveness Monitoring Manual of Ontario.
Indigenous opportunities.	The Licensee provides Indigenous opportunities. Several First Nations representatives sat on the planning team. In addition, an Indigenous representative is a member of Westwind's Board of Directors. Westwind has supported several First Nations forestry projects, has bi-annual meetings with First Nations, has established a First Nations Steering Committee, and has developed a Policy for Indigenous Engagement.
Preparation of compliance plan.	The Licensee met its compliance planning and reporting requirements.
Compliance inspections and reporting; compliance with compliance plan.	The Licensee met its compliance inspection and reporting requirements.
Internal compliance prevention/education program.	The Licensee provided compliance services directly and hence has limited training programs for overlapping licenses.
Compliance inspections and reporting.	The Licensee and NDMNRF met their compliance inspection and reporting requirements.
Licensee forestry operations on mining claims.	Field observations found mining claim posts were protected during harvest operations.

APPENDIX 4. AUDIT PROCESS

The Independent Forest Audits (IFAs) generally assess licence holder and Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF) compliance with the Forest Management Planning Manual (FMPM) and the CFSA in conducting forest management planning, operations, monitoring and reporting activities.

The Independent Forest Audit Process and Protocol (IFAPP) provides guidance in meeting the requirements of Ontario Regulation 319/20 made under the Crown Forest Sustainability Act (CFSA).

The IFAPP is based on eight guiding principles and contains 107 procedures that are applicable to the French-Severn Forest. The audit procedure serves as a framework to provide a structured approach to evaluating whether forest management activities meet the requirements governing forestry practices on Crown land in Ontario. The guiding principles are:

- Commitment
- Public consultation, and First Nations and Métis community involvement and consultation
- Forest Management Planning
- Plan Assessment and Implementation
- System Support
- Monitoring
- Achievement of Management Objectives and Forest Sustainability
- Contractual Obligations

NDMNRF categorized most of the IFA procedures based on complexity and their potential impact on forest sustainability. The IFAPP directs the Audit team to assess through sampling, per audit principle and associated criteria, the three categories of procedures as follows:

- Administrative procedures – low risk: 20-30% of low-risk procedures are to be assessed;
- Administrative but also having a bearing on sustainable forest management – medium risk: 50-75% of medium risk procedures are to be assessed; and,
- Procedures directly related to sustainable forest management – high risk: 100% of high-risk procedures are to be assessed.

Table 17 summarizes the number of procedures selected by the audit team for audit based on the direction provided by the IFAPP.

Table 17. IFA Procedures Selected by the audit team

Principle	Optional – Applicable (#)	Optional – Selected (#)	Optional – % Audited	Mandatory Audited (#) (100% Audited)	Comments
1. Commitment	0	0	0	0	
2. Public consultation and First Nations and Métis involvement	5	2	40%	4	
3. Forest management planning	23	1	4.3%	43	
4. Plan assessment and implementation	0	0	0	7	
5. System support	2	1	50%	0	
6. Monitoring	2	0	0	4	
7. Achievement of management objectives and forest sustainability	0	0	0	5	
8. Contractual obligations	7	0	0	23	
Totals	39	4	10.25%	86	

The audit process for the French-Severn Forest IFA consisted of eight components:

1. Audit Plan: RFS prepared an audit plan that described the schedule of audit activities, audit team members and their qualifications, audit participants, and auditing methods. The audit plan was submitted to NDMNRF, the Forestry Futures Trust Committee (FFTC), and the French-Severn Forest LCC.
2. Public Consultation: RFS received the mailing list from NDMNRF that was used during the preparation of the 2019-2029 Forest Management Plan and the contact information for First Nations' and Métis communities, and for the LCC. A sub-sample of the mailing list was used and a letter with a brief survey/questionnaire was sent out advising the public of the audit and inviting comments. The LCC and the Board of Directors of Westwind were advised of the audit prior to the pre-audit meeting taking place.

Members of the LCC participated in the pre-audit meeting. The consultation auditor spoke with four members of the Westwind Board, including the Chair, and interviewed five members of the Local Citizens' Committee (LCC), plus the Chair.

3. Indigenous engagement: NDMNRF Parry Sound District and the NDMNRF Resource Liaison Officer provided RFS with contact information for the 16 First Nations communities and two Métis Councils affiliated with the Forest. An invitation email was sent to all of these, followed up by phone calls to each, requesting their input, encouraging them to contact RFS if they wished to participate in the audit, and asking if they required more information before deciding. RFS contacted the Chief, or Lands and Resources officer of each of these Indigenous communities through email and telephone to request an interview. It was possible to communicate directly by phone, at least briefly, regarding the substance of the audit with representatives of three First Nations.
4. Field Site Selection: The audit team conducted the preliminary site selection prior to the pre-audit meeting. Annual Work Schedules, Annual Reports along with associated spatial files were used to ascertain the amount and type of forest operations carried out on the Forest during the audit period. A stratified random sample of sites was then selected to ensure that selected sites were representative of a cross section of all activities conducted on the Forest during the audit period. It was also confirmed that the major operators were represented in the selection. The auditees were informed of the site selections before the field visit and helped with the coordination of the field audit days.
5. Pre-audit Document Review: Prior to the site visit, the audit team reviewed documents provided by the auditees, including the:
 - a. 2009-2019 Phase II FMP and the 2019-2029 FMP for the French-Severn Forest;
 - b. Annual Work Schedules and Annual Reports associated with the above FMPs for the audit term;
 - c. French-Severn Forest 2011-2016 Independent Forest Audit Report;
 - d. French-Severn Forest 2011-2016 Independent Forest Audit Action Plan and the French-Severn Forest 2011-2016 Independent Forest Audit Action Plan Status Report;
 - e. 2016 Provincial Independent Forest Audit Action Plan.
6. On-site Audit: The objectives of the field site visits were to confirm that activities were conducted according to plan, that they conformed to provincial laws, regulations, and guidelines, and that they were effective. The site visit began on September 28th, 2021.

- a. The Audit team conducted interviews with Westwind and NDMNRF staff, overlapping licence holders, and with LCC and Indigenous community members. The audit team examined documents, records, and maps at the Westwind and NDMNRF offices in Parry Sound. The audit team spent two truck days in the field viewing selected sites with representatives of Westwind, NDMNRF District and Region, the overlapping licence holders, and a representative of the Forestry Futures Trust Committee. Table 18 indicates the audit sample intensity.
 - b. End-of Day meetings were used to debrief the auditee about the preliminary audit findings and inform auditees about additional information requirements.
7. Closing Meeting: The closing meeting was held via remote communications on October 8th, 2021. The meeting provided a forum for the audit team to present and discuss preliminary audit findings in the Draft Appendix 1 with the auditees. Within 30 days of the closing meeting, draft audit reports were circulated to the auditees who verified facts and provided invaluable input in writing and teleconferences that was used in developing the final report.
8. Audit Report: The audit results are presented in this report, following a brief description of the audit process and the forest licence area under review. Within the report, the audit team has made findings to address instances of a non-conformance to a law and/or policy, or an identified lack of effectiveness in forest management activities.

Table 18. Sampling intensity for each forestry activity examined as part of the field site visits. According to the Specified Procedures document of the French-Severn Forest, Westwind Stewardship Inc. April 1, 2019, to March 31, 2020, the specified procedures 10% target was achieved.

Treatment	Source	2016-17	2017-18	2018-19	2019-20	2020-21*	Total
Plant	AR Total (ha)	573.0	242.8	102.7	94.1	206.3	1,218.9
	Sample Size (ha)	139.8	12.0	8.1	36.1	125.1	321.1
	%	24.0	4.9	7.8	38.0	60.0	26.3
Natural	AR Total (ha)	0	0	0	0	0	0

	Sample Size (ha)	0	0	0	0	0	0
	%	0	0	0	0	0	0
SIP	AR Total (ha)	366.3	101.2	223.7	248.5	84.7	1,024.4
	Sample Size (ha)	61.1	8.1	36.1	122.5	4.0	231.8
	%	16.6	8.0	16.1	49.3	4.7	22.6
Harvest	AR Total (ha)	3,838.3	4,178.7	3515.3	3596.0	2863.0	17,992.6
	Sample Size (ha)	559.2	1,005.0	716.1	1,734.5	270.0	4284.8
	%	14.5	24.0	20.4	48.0	9.4	23.8
Tending	AR Total (ha)	620	728	1002	661	402	3413
	Sample Size (ha)	13.1	73.2	80.3	208.8	49.3	424.6
	%	2.0	10.0	8.0	31.5	12.2	12.4
FTG	AR Total (ha)	2,582.6	1625.5	1030.7	1788.5	900.9	7,928.2
	Sample Size (ha)	93.6	371.7	192.9	988	0	1,646.2
	%	3.6	22.8	18.7	55.7	0	20.7
Aggregate Pits	AR Total (ha)	5.0	12.0	6.0	6.0	7.0	36.0

	Sample Size (ha)	2.0	2.0	1.0	1.0	1.0	8.0
	%	20.0	16.6	16.6	16.6	14.2	22.0
Water Crossing Installations and Removals	AR Total (ha)	11	25	12	35	20	103
	Sample Size (ha)	1	3	3	9	2	18
	%	9.0	12.0	25.0	25.7	10.0	17.4
Roads Constructed	AR Total (ha)	0.0	8.0	6	1	4	19
	Sample Size (ha)	0	1.9	1.2	1	2	6.1
	%	0	24.0	20	100.0	50.0	32.1
Roads Maintained	AR Total (ha)	232	347	578	237	348	1742.0
	Sample Size (ha)	33.6	83.3	117.9	113.7	32.7	381.2
	%	14.5	24.0	20.4	48.0	9.4	21.8

* Annual Report not available. Values provided by Westwind.

Action plans are significant components of the sustainable forest management framework under the CFSA. Action plans address a range of considerations that are integral to sustainable Crown Forest management, including instances of non-compliance or inconsistency with applicable Crown Forest Policy Requirements. The director of the NDMNRF's Integration Branch, working under the authority of the Minister, may prepare an action plan to address the findings from this audit and may require Westwind to participate in the preparation of the action plan.

Public Response

Two responses to the survey were received and four queries were responded to by the audit team mostly clarifying the purpose and objective of the audit.

Local Citizens Committee

Letters were emailed to all LCC members to notify them of the upcoming audit and invite their input. The chair of the LCC responded and a couple of phone conversations and e-mail exchanges took place in preparation for the pre-audit meeting and the field visits. A member of the audit team interviewed members of the LCC including the Chair. As part of the audit process, the consultation auditor contacted all members of the LCC, and were able to conduct interviews with a total of five members of the LCC, plus the Chair. LCC members expressed a high degree of satisfaction with the company working with the LCC to address any issues during planning, AWS, roads, etc.

Indigenous Communities

After the award of or the audit, NDMNRF Resources Liaison Officer was contacted and asked to advise the best options for consultation. It was suggested that auditors would reach out to the communities directly. The NDMNRF Resources Liaison Officer provided a list of 16 First Nations communities, as well as two Metis Councils, with contact information. E-mails were sent to the 16 Aboriginal communities recognized by NDMNRF to be in or adjacent to the forest management area as well as the two Metis Councils inviting them to participate in the audit. The covering note explained that all input is welcomed and encouraged all affected or interested parties to contact RFS if they wished to participate in the audit or if they required more information. The e-mail included a survey to facilitate input. Attempts were made to contact each community by telephone, with voicemail messages left for community representatives when not possible to speak in-person. The consultation auditor was able to speak directly with representatives of three communities on the substance of the audit. Based on the limited input, no indication of dissatisfaction with the relationship with Westwind was garnered. Based on previous experience, issues raised are often related to broader issues such as land claims, benefits from the forest, and sharing of stumpage fees. These issues transcend the local NDMNRF district and the licensee and are part of negotiations that Indigenous communities may engage in with the Federal and Provincial Governments.

Licensee

Planning and operations staff of Westwind Forest Stewardship Inc. participated in all aspects of the audit including provision of documentation, attendance at meetings, participation during interviews and as guides during the field audit. The audit team appreciates the support provided by Westwind staff during the audit.

Overlapping Licensees, Contractors and Commitment Holders

Westwind has twenty Overlapping Licence Agreement (OLA) holders that include harvesters and receiving mills. An email was sent out to all OLA holders with the invitation to fill in online

survey, contact auditor via email, or to arrange a phone interview or in-person meeting. Opportunity to attend the field site visits was also provided.

Ministry of Northern Development, Mines, Natural Resources and Forestry

NDMNRF District staff participated in all aspects of the audit. Interviews were held with the Resource Liaison Officer, the Management Forester, the Regional Forest Management Planning Specialist, and the District Management Biologist. NDMNRF District personnel and regional representatives also accompanied the audit team in the field.

Forestry Futures Trust Committee

Two members of the Forestry Futures Trust Committee and two staff participated in the pre-audit meeting, the field site visits and the closing meeting.

APPENDIX 5. LIST OF ACRONYMS USED

AHA	Available Harvest Area
AOC	Area of Concern
AR	Annual Report
AWS	Annual Work Schedule
BBD	Beech Bark Disease
CFSA	Crown Forest Sustainability Act
CROs	Conditions for Regular Operations
eFRI	enhanced Forest Resource Inventory
FFT	Forestry Futures Trust
FFTC	Forestry Futures Trust Committee
FIM	Forest Information Manual
FMP	Forest Management Plan
FMPM	Forest Management Planning Manual
FOIP	Forest Operations Information Program
FOP	Forest Operations Prescription
FRI	Forest Resource Inventory
FRL	Forest Resources License
FRT	Forest Renewal Trust
FTG	Free-To-Grow
FSC	Forest Stewardship Council
HDSEL	Hardwood Selection Forest Unit
HDUS	Hardwood Uniform Shelterwood Forest Unit
IFA	Independent Forest Audit
IFAPP	Independent Forest Audit Process and Protocol
LCC	Local Citizens Committee
LTMD	Long Term Management Direction

NDMNRF	Ministry of Northern Development, Mines, Natural Resources and Forestry
MOA	Memorandum of Agreement
OLA	Overlapping License Agreement
PWUS	White Pine Uniform Shelterwood forest unit
QA/QC	Quality Assurance/Quality Control
SAR	Species at Risk
SEM	Silvicultural Effectiveness Monitoring
SFI	Sustainable Forestry Initiative
SFL	Sustainable Forest License
SGR	Silviculture Ground Rule
SPA	Special Purposes Account

APPENDIX 6. AUDIT TEAM MEMBERS AND QUALIFICATIONS

Name	Responsibility	Qualifications
Stéphane Audet R.P.F.	Lead auditor, core team member (harvest operations, planning, monitoring, contractual obligations, determination of sustainability)	R.P.F., H.B.Sc.F.; 20 years of forestry experience with a primary focus on silviculture and forest inventory. Stéphane has been an auditor on nine previous IFAs and has conducted numerous FSC and SFI audits in Ontario, Quebec, and New Brunswick. Mr. Audet has completed the ISO 14000 EMS Lead Auditor Training. Stéphane is a managing partner at KBM Resources Group.
Marcelo Levy	Core team member (Silviculture planning, implementation, and monitoring, contractual obligations, determination of sustainability)	M.E.S.; experienced in forest certification and other verification and inspection mechanisms, program evaluation, with extensive experience in collaborative and multi-stakeholder processes and consultation. An international consultant and founding partner of Responsible Forestry Solutions.
Fraser Smith R.P.F.	Core team member (Wildlife, ecological planning and implementation, access planning and implementation, contractual obligations, determination of sustainability)	R.P.F. in consulting practice with focus on silviculture, tree marking, and invasive species management. Fraser is the recipient of multiple forestry awards and provides forestry support services to a range of government agencies and ENGOs. Level 2 auditor and instructor for the provincial Tree Marker Training Program.
Nick Moss Gillespie R.P.F.	Core team member (Aboriginal and local involvement, contractual obligations)	R.P.F., M.F.C. International forestry consultant with over 23 years' experience leading and participating in certification and compliance audits, as well as due diligence, in the Americas, Europe, and Indonesia. Focus on risk management in supply chains, social aspects, stakeholder engagement, and indigenous consultation. Founding partner of Responsible Forestry Solutions.
Eric Bongelli	Audit team member (secretariat)	M.E.S in Geography. Eric is a Junior Consultant with KBM Resources Group. Eric has 5-years experience across various sectors. With multiple peer-reviewed publications Eric is experienced with report and technical writing. He has worked on various projects including forestry management practices and analysis and wildlife modelling.