

KENOGAMI FOREST
2015 INDEPENDENT FOREST AUDIT
MANAGEMENT UNIT ACTION PLAN

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Introduction

In September 2015 an Independent Forest Audit (IFA) was conducted on the Kenogami Forest by Arbex Forest Resource Consultants Ltd. for the period April 1, 2010 to March 31, 2015. The audit report was accepted as final by the Forestry Futures Committee on February 8, 2016. The action plan is due April 8, 2016.

The Kenogami Forest became a Crown Management Unit on August 1, 2012 and an Enhanced Forest Resource Licence (eFRL) was issued to Ne-Daa-Kii-Me-Naan Inc. (Nedaak Inc.) on November 9, 2012 to manage the Forest in conjunction with the Crown.

The audit report includes a total of 13 recommendations. There are 2 recommendations directed to the District MNR, 4 recommendations directed to Nedaak Inc., 5 recommendations directed to both District MNR and Nedaak Inc., 1 recommendation directed to the Northwest Region and 1 Recommendation directed to corporate MNR Crown Forests and Lands Policy Branch. The regional (#1) and corporate (#2) recommendations will be addressed in a separate 2015 provincial action plan. The remaining 11 audit recommendations are addressed in this management unit action plan which outlines the actions required, responsibility, timelines, and method of tracking progress of actions.

The audit included recommendations under six of the headings of the eight IFA Principles (Principles 3 to 8). Therefore, the other IFA Principle headings (Principles 1 and 2) have not been included in this action plan.

Recommendations

Principle 3: Forest Management Planning

Recommendation #3:

Nedaak must improve the quality of its AWS revisions and FMP amendment requests and the MNR District must adhere to FMP/FIM schedules for the approval of amendments and revisions.

Action(s) required:

1. Nedaak will work with Overlapping Licensees to facilitate advance notice of, and the nature of, revisions and amendments to prior to their submission to MNR through the FI Portal.

2. Prior to the initial submission of any amendment or a revision Nedaak will have discussions with the MNRF Resources Management Forester to ensure that necessary information is contained within the initial (pre) submission and also to discuss timelines.
3. Nedaak will ensure that FMP amendments address the FMPM requirements in Part C, Section 2.2. This will include precise textual descriptions, and where appropriate maps that depict specifically what the amendments and revisions are about, not just the required updated required maps.
4. For amendments, once a satisfactory product is developed, MNRF will review the initial request and provide the MNRF decision documentation on whether to proceed with the amendment and the category of amendment normally within 15 days of receipt of an acceptable document as per the FMPM, which will then allow Nedaak to submit to the FI Portal.
5. For revisions or amendments, there is no specific FMPM or FIM related timeline for approval and MNRF will endeavor to review the FI Portal submission as quickly as possible.

Organization and position responsible:

1. Nedaak Chief Forester.
2. MNRF Nipigon District Resources Management Forester and Nedaak Chief Forester.
3. Nedaak Chief Forester.
4. MNRF Nipigon District Resources Management Forester.
5. MNRF Nipigon District Resources Management Forester.

Deadline date:

1. Starting February 2016 and ongoing.
2. Starting February 2016 and ongoing.
3. Starting February 2016 and ongoing.
4. Starting February 2016 and ongoing.
5. Starting February 2016 and ongoing.

Method of tracking progress:

1. Records of discussions.
2. Submission request letters: If subsequent submissions are required, either a new submission request letter will be included with the new submission date on the letter, or the letters will include a history of the various submissions; reduced number of re-submissions.
3. MNRF review documentation.
4. MNRF decision documentation, FI Portal submission and approval dates, MNRF review documentation.
5. FI Portal submission and approval dates, MNRF review documentation.

Recommendation #9:

The MNRF District and Nedaak must adhere to compliance direction and targets described in the FMP, approved compliance plans and the AWS.

Action(s) required:

1. Review the 2011 Kenogami FMP Compliance section with respect to roles and responsibilities with all parties (MNRF, Nedaak, Overlapping Licencees, etc) to ensure it is correct and amend the FMP where appropriate.
2. To ensure that an adequate MNRF presence is made, Nipigon District MNRF will utilise staff from both the Geraldton and Nipigon offices so that the planned annual compliance workload targets on the Kenogami Forest are met.
3. Nedaak will develop a tracking system that will document by Compliance Reporting Area, compliance related notifications (i.e. start-up, release) and compliance reports (i.e. FOIP reports) to facilitate meeting the targets defined in the Compliance section of the 2011 Kenogami FMP.

Organization and position responsible:

1. MNRF Nipigon District Resources Management Forester and Nedaak Chief Forester.
2. MNRF Nipigon District Resources Management Supervisors.
3. Nedaak Chief Forester.

Deadline date:

1. May 31, 2016.
2. Starting January 1, 2016 and ongoing.
3. April 1, 2016.

Method of tracking progress:

1. Record that review discussion occurred, FMP amendment if needed.
2. Annual Reports: number of MNRF inspections reported.
3. Tracking system.

Principle 4: Plan Assessment and Implementation

Recommendation #4:

Nedaak must augment its forest renewal program to reduce the gap between the area harvested and the area renewed.

Action(s) required:

1. Nedaak will complete a GIS exercise to determine where and what the differences are between areas renewed and harvest area.
2. Based on the GIS exercise Nedaak will survey outstanding areas to determine best silvicultural treatment(s) for the site and will implement the treatments.

3. Nedaak will survey areas where treatment is not needed and area may meet Free-to-grow (FTG) standards with a FTG survey and report the results in the Annual Report.

Organization and position responsible:

1. Nedaak Chief Forester.
2. Nedaak Chief Forester.
3. Nedaak Chief Forester.

Deadline date:

1. July 15, 2016.
2. Surveys beginning after July 15, 2016 and completed by August 31, 2017; natural regeneration reported beginning in 2016/17 AR and completed by 2017/18 AR due Nov 15, 2018; treatments implemented commencing in 2017.
3. Surveys completed by August 31, 2017; reported in 2017/18 AR due Nov 15, 2018.

Method of tracking progress:

1. GIS identification of areas.
2. Survey records, Annual Reports.
3. Survey records, Annual Reports.

Recommendation #5:

Nedaak must assess the efficacy of the reducing the active ingredient (a.i) in herbicide tending program to determine 1) the effectiveness of reduced levels of a.i. in suppressing competing vegetation and preventing/minimizing the establishment of undesirable species 2) cost-effectiveness and 3) its implications on the achievement of FMP desired future forest condition.

Action(s) required:

1. Nedaak has been made aware that there is potential for crop damage with higher rates a.i. of VisionMax used in aerial tending operations. Three forests (Dog River-Matawan, Lac Seul, Crossroute) are investigating the causes of damage (different rates of a.i, litres of application per hectare and damage results) and are trying different scenarios (a.i., water, timing of application) to determine the conditions that cause crop damage. Once causes are determined, Nedaak will use the information to assess their program and direction for future use of VisionMax.
2. Cost effectiveness will be determined using the future forest condition expected against the resulting costs with varying rates of a.i. and potential crop damage and/or replacement.
3. Nedaak will determine the effect of different rates of a.i. on the tending program with respect to the FMP desired future forest condition and reduction of

hardwood species/stunted growth and then confirm the application a.i. rate to be used.

Organization and position responsible:

1. Nedaak Chief Forester.
2. Nedaak Chief Forester.
3. Nedaak Chief Forester.

Deadline date:

1. November 2018.
2. November 2018.
3. November 2018.

Method of tracking progress:

1. Notes from review of other forests information.
2. Annual Report of a.i. rates used.
3. AWS 2018 application with a.i. rate to be used.

Recommendation #6:

Nedaak must effectively track OFRL operations merchandizing poplar veneer and ensure that slash from the operations is appropriately managed.

Action(s) required:

1. The locations of where poplar veneer operations are occurring will be tracked through the Kenogami Forest compliance start-up notification form that is submitted by all licensees prior to start-up of their harvest operations. Poplar intent will be added as a requirement to be identified on this form (i.e. hog, veneer, no market).
2. Nedaak will ensure follow-up inspections are completed on all areas where veneer operations are occurring to check that these operations are being conducted in accordance with the veneer harvest operation direction in the phase II 2016 Kenogami Forest FMP (section 8.3.5.1.2 veneer harvest operations and 8.2.2.2 conditions on regular operations). This FMP direction includes reducing the loss of productive land at roadside and within the cutover from veneer operations. Any identified operational issues will be addressed.

Organization and position responsible:

1. Nedaak Chief Forester.
2. Nedaak Chief Forester.

Deadline date:

1. Ongoing beginning April 1, 2016.
2. Ongoing beginning April 1, 2016.

Method of tracking progress:

1. Compliance start-up notifications.
2. FOIP Reports, Annual Report data layer reporting of slash management area.

Principle 5: System Support

Recommendation #7:

Nedaak must enhance its training of seasonal staff to include broader contextual information on FMP requirements and their implementation rationale.

Action(s) required:

1. Nedaak will continue to train seasonal staff specific to the tasks they are hired for and continue to provide rationale specific to those tasks and its part in the FMP process. Nedaak will also provide general knowledge information e.g. a handout about the Kenogami Forest as well as general information about forest management planning such as MNRFs *Help Shape Ontario's Forests* and a website link for further details about forest management:
<https://www.ontario.ca/page/forestry>

Organization and position responsible:

1. Nedaak Chief Forester.

Deadline date:

1. Starting in 2016 and ongoing annually.

Method of tracking progress:

1. Training records.

Principle 6: Monitoring

Recommendation #8:

The MNRF District must ensure that outstanding MNRF FOIP inspections are closed and Nedaak must monitor the compliance program implemented by the OFRLs to ensure that all obligations and responsibilities for compliance monitoring and reporting are met.

Action(s) required:

1. Nipigon District will use their compliance tracking data base to track the status of those operations where the district has received a start-up report. Information for the data base tracking status will come from bi-weekly MNRF district compliance meetings. Outstanding MNRF FOIP reports will be reviewed at these meetings, assigned a deadline for action and followed up until they are closed.
2. Nedaak will monitor the OFRLs compliance program on a weekly basis to ensure they are meeting their obligations and responsibilities as per the FMP compliance

plan and Forest Compliance Manual and provide updates on outstanding reports to OFRLs as issues develop. The tracking system to be developed by April 1, 2016 as noted in recommendation #9 will facilitate this monitoring.

Organization and position responsible:

1. MNRF Nipigon District Resources Supervisor (lead), Resource Management Forester, compliance inspectors.
2. Nedaak Compliance Inspector.

Deadline date:

1. Starting April 1, 2016 and ongoing.
2. Starting April 1, 2016 and ongoing.

Method of tracking progress:

1. Nipigon District compliance tracking data base, records of meetings; outstanding MNRF inspections in FOIP are closed.
2. Tracking system.

Recommendation #10:

MNRF District and Nedaak staff must investigate the reasons for the differences in FTG survey results and adjust their FTG survey methodologies to address the discrepancies in the results reported for silviculture and regeneration success.

Action(s) required:

1. For the 2016 field season, MNRF will work together with Nedaak on a subset of their individual FTG programs. The blocks will be surveyed via both methodologies (industry and MNRF). The selected blocks will then jointly be analysed for results. In addition MNRF and Nedaak will review how the applicable SGR being evaluated is determined, how areas are stratified for sampling and MNRF SEM report recommendations. The reasons for discrepancies will be summarized with how they will be addressed e.g. any changes to company or MNRF survey methods to provide for comparability/acceptable range of variance, area stratification, applicable SGR documentation.

Organization and position responsible:

1. MNRF Nipigon District Resources Management Forester and Nedaak Chief Forester (leads); MNRF Nipigon District Resource Management Technicians (implementation) and MNRF Northwest Region Forested Ecosystem Science Specialist (survey methodologies and advice).

Deadline date:

1. Beginning Spring 2016 for implementation in 2017 field season.

Method of tracking progress:

1. Summary report.

Recommendation #11:

The MNRF District should place a priority emphasis on the completion of Core Task 1 and Core Task 2 SEM monitoring functions until there is less discrepancy between industry and MNRF statistics for regeneration and silviculture success.

Action(s) required:

1. MNRF will conduct field tasks as required of the NWR SEM strategy which began in 2015-16. For 2016-17 field task 1 is to conduct surveys of FTG prior to the AR where practical or FTG results reported in a recent AR with the District to identify their priorities/amounts. The actions required to address R#10 are the key SEM priorities for the 2016 field season.

Surveying areas after FTG in Field task 2 will not occur in 2016-17 as post FTG assessments requires further considerations through the Provincial Silviculture Enhancement Initiative (SEI) including purpose, methods, timing, and what organization should be conducting those surveys.

The field tasks to be completed will be reviewed annually including how the SEI will be implemented.

Organization and position responsible:

1. MNRF Nipigon District Resources Management Forester (lead), Resource Management Technicians (implementation) and MNRF Northwest Region Forested Ecosystem Science Specialist (support).

Deadline date:

1. Ongoing annually beginning Spring 2016.

Method of tracking progress:

1. NWR SEM Reports and data for the Kenogami Forest.

Principle 7: Achievement of Management Objectives & Forest Sustainability

Recommendation #12:

The MNRF District Office and Nedaak must reconcile area reported as lands below regeneration standards in the forest inventory and make the appropriate corrections to tables in the ARs, FMP and Trends Analysis Report. Forest management surveys and/or assessments within this area should be completed as necessary, and if required, silviculture treatments implemented to ensure that renewal standards are achieved.

Action(s) required:

1. The area noted as below regeneration standards is what was reported at the time of development of the 2011 FMP. Nedaak will complete an inventory update to provide an updated summary of the amount of area below

regeneration standards as of 2016. This update will account for areas that have been declared FTG including naturally regenerated areas. Therefore, past Annual Reports, the past 2011 FMP, and the Trend Analysis Report that was based on past ARs would not be updated. The results of this exercise will be shared with the MNR District.

2. Areas that may require surveys and/or silviculture treatments will be completed as part of actions 2 and 3 in recommendation #4.

Organization and position responsible:

1. Nedaak Chief Forester (lead), MNR District Resources Management Forester.
2. Nedaak Chief Forester.

Deadline date:

1. September 30, 2016
2. Refer to R#4 actions 2 and 3.

Method of tracking progress:

1. Inventory update, summary.
2. Refer to R#4 actions 2 and 3.

Principle 8: Contractual Obligations

Recommendation #13:

The MNR District Manager must ensure that the IFA Action Plan is submitted in accordance with the due date established in the Independent Forest Audit Process and Protocol (IFAPP) and that all Action Plan items are addressed within an appropriate period of time.

Action(s) required:

1. An action plan production schedule will be prepared to ensure the action plan will be submitted by the District Manager within 2 months of acceptance of the final audit report by the Forestry Futures Committee.
2. The action plan will be prepared in accordance with the action plan production schedule.
3. For each audit recommendation the action plan will include actions required and deadline dates to address the issues identified in the audit report as soon as possible. These actions required will be implemented by the deadline dates.

Organization and position responsible:

1. MNR Northwest Region Forest Operations Specialist (lead), MNR Geraldton Resources Management Forester and Nedaak Chief Forester.

2. MNRF Geraldton Resources Management Forester, Nedaak Chief Forester, MNRF Northwest Region Forest Operations Specialist.
3. MNRF Geraldton Resources Management Forester and Nedaak Chief Forester (leads), Nedaak General Manager, MNRF Nipigon District Manager.

Deadline date:

1. Completed March 4, 2016.
2. April 8, 2016.
3. April 8, 2016 action plan preparation; implementation – refer to each action plan recommendation and status report due April 8, 2018.

Method of tracking progress:

1. Action plan production schedule.
2. Date signed by District Manager on Action Plan signature page.
3. Action plan, status report.