

Ogoki Forest Management Unit
2010-2017 Independent Forest Audit
Management Unit Action Plan

Status Report

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Introduction

In October 2017, an Independent Forest Audit (IFA) was conducted on the Ogoki Forest for the period April 1, 2010 to March 31, 2017. The final audit report was received and accepted by the Forestry Futures Trust Committee (FFTC) on December 22, 2017. The action plan resulting from the final report was endorsed and submitted to the Northwest (NW) Regional Director on April 6th, 2018. It was subsequently approved on April 9, 2018.

The final audit report for the Ogoki Forest included 11 Findings which had been directed to the Ministry of Natural Resources and Forestry (MNRF) as the manager of the Forest since 2013. This status report is required to be submitted by the District Manager two years after approval of the action plan and, with the exception of Finding #11 provides an update on the status of action items developed in response to the audit findings.

Finding #11 concluded the annual renewal rate analyses conducted for the Ogoki Forest, during the audit period, did not consider the full cost of the silvicultural liability. However, through a root cause analysis approach, the action plan development team determined no action was required. The District prepared renewal rate analyses for each year of the audit term as required and continues to prepare a renewal charge analysis on an annual basis in order to recommend the annual renewal charge for the Ogoki Forest to the Regional Director. The annual renewal rate analysis continues to include and consider the cost of any outstanding or historical silviculture liability as well as planned silviculture. The Status updates which follow in this report show these liabilities are indeed being addressed effectively.

At this time, the Ogoki Forest remains managed as a Crown Management Unit (CMU) by the Nipigon District Ministry of Natural Resources and Forestry. Currently, Agoke Development Limited Partnership (ADLP) operates on the forest as a Forest Resources Licence (FRL) holder. ADLP entered a Forestry Agreement with MNRF as an interim forest management approach for the period April 1, 2018 to March 31, 2020. The Forestry Agreement was extended for the period April 1, 2020 to March 31, 2022.

It is important to note that the implementation of 2017 Independent Forest Audit Process and Protocol (IFAPP) introduced changes in how regulatory requirement Ontario160/04 to provide "Recommendations" is satisfied. Under the 2017 IFAPP, this regulation is now satisfied through a statement of findings, of which supporting evidence and conclusions for each finding is documented in the "Record of Findings" of the IFA report Appendices.

Additionally, "Corporate MNRF" findings will now be assessed for appropriate action as part of the management unit's (MU) individual IFA Action Plan rather than in a separate "Provincial Action Plan" as was done for past IFA's. Corporate MNRF-tasks action items will describe the action required and provide a statement that it will be considered as part of the regular corporate work planning and policy review cycle.

There were no findings directed to Corporate MNRF as a result of the Ogoki 2017 IFA.

Findings

Finding #1:

The MNRF organization was not fully committed to meeting its legal requirements in place for sustainable management of the Ogoki Forest over the audited period.

Action Required:

1. Review and summarize legal forest management obligations which have been identified in the audit as not being met. Produce a list of missing information and reports not completed.
2. Review present district staff commitments, identify available resources, versus available budget to determine capacity requirements.
3. Identify issues in the District data/information management system and summarize. Revise as appropriate to meet legal requirements.
4. Negotiate a forest management agreement with prospective Ogoki Forest licensee(s) and summarize opportunities for the licensee to help in meeting legal requirements.

Progress to Date:

1. **Completed:** Legal forest management obligations that were identified in the audit as not being met were reviewed. A document listing missing information and reports was produced and is stored on the Nipigon District file share (Geraldton server, Ogoki Forest, 2017 IFA Status Report folder). Forest management obligations that were specifically identified in Findings #2 through #11 are addressed in further detail in the following sections of this Status Report.
2. **Completed:** The Nipigon District Leadership Team (DLT) has an annual work planning process that helps to identify the District workload and prioritize work effort that is assigned to staff. A work planning spreadsheet is produced annually and is used to describe work, specific targets, resources required, and identify staff leads for projects. The source of the need for the work, be this legislative or policy driven, corporate direction, or in response to specific issues is identified and considered in the process. A summary of the Nipigon District work planning process is documented and stored on the Nipigon District file share (Geraldton server, Ogoki Forest, 2017 IFA Status Report folder), and the workplan for each fiscal year is held on file by DLT. It is recognized by DLT that work planning is fluid and that timing and priorities may change during the year.

Where a review of district commitments versus resources had been identified as an Action Item for the other Findings in the audit Action Plan, a description of how this was addressed is included in the applicable sections that follow in this Status Report.

3. **Completed:** The District data and information management system had issues with consistency and completeness in terms of files related to the Ogoki Forest.

These issues were in part due to there being changes in the District's file management system over the course of the 2010 to 2017 audit term. This included a move to a central Nipigon file share, with two new servers for each of the Nipigon and the Geraldton area office file leads. Prior to this move, files related to the Ogoki Forest were stored on a local server in Geraldton ("GIS_Data", also referred to as the "old" Geraldton server), or among individual staff files on desktop computers or in hard copy files. Staff turnover during the audit term, particularly with the position of the Management Forester for the Ogoki Forest, also contributed to a lack of consistency in how files were managed and organized. As well, with the surrender of the former Ogoki SFL in 2013, electronic and hard copy files held by the former licensee were surrendered to the MNRF. Boxes of various hard copy files and electronic records were transferred to the Nipigon District MNRF office and were stored at its warehouse.

To address the Action Item, the contents of all available electronic District files related to management of the Ogoki Forest were reviewed. The structure of the Ogoki Forest filing system on the Nipigon file share was reviewed for consistency with that of the other forest management units in the District. It was ensured that any files or documents pertaining to or that form part of the legislated requirements for the management of the Ogoki Forest were stored to the central Nipigon file share (Geraldton server). This included approved products related to forest management planning (e.g. Annual Work Schedules, Annual Reports), licensing documents and records of silviculture expenditures claimed from the Ogoki Forest Renewal Trust account.

There remain documents stored on the old Geraldton server that have not been incorporated into the Nipigon File Plan. These documents are stored in folders previously managed by District foresters in charge of the Ogoki Forest during the audit term, and mainly consist of email documentation relevant to forest management planning activities of the day. This type of historical documentation has been retained for reference but is not part of legislated requirements and has not been stored on the new file share.

An inventory of the SFL surrender documents was also conducted and a summary of the contents of boxes and electronic files was produced and stored on the Nipigon District file share (Geraldton server, Ogoki Forest, 2017 IFA Status Report folder).

4. **Completed:** A Forestry Agreement was signed between MNRF and the Ogoki Forest licensee, Agoke Development Limited Partnership (ADLP), on March 22, 2018 for the period April 1, 2018 to March 31, 2020. This Agreement was extended for the two-year period April 1, 2020 to March 31, 2022. The Agreement is intended as an interim forest management approach to ensure the Ogoki Forest continues to be sustainably managed while an Enhanced SFL is being developed. Many of the Findings identified in the 2017 IFA report are attributed to gaps in District capacity to fulfill the legal requirements that would normally fall under the responsibility of an SFL holder. The Forestry Agreement identifies the legal requirements for which the licensee is responsible to ensure the sustainable management of the Ogoki Forest.

Where the negotiation of a forest management agreement with prospective Ogoki Forest licensee(s) had been identified as an Action Item for other findings in the audit Action Plan, a description of how the Forestry Agreement with the licensee has addressed the Finding(s) is included in the applicable section(s) that follow in this Status Report.

Future Tracking Requirements:

1. No future tracking required.
2. No future tracking required.
3. No future tracking required.
4. No future tracking required.

Finding #2:

MNRF has not developed FOP prescriptions for silviculture undertaken in the Ogoki Forest as required by the FMPM.

Action Required:

1. Review present district staff commitments, identify available resources, versus available budget to determine capacity requirements.
2. Negotiate a forest management agreement with prospective Ogoki Forest licensee(s) that includes provisions for the licensee to meet obligations similar to that of a Sustainable Forest License (SFL) holder including the preparation of Annual Work Schedules and associated forest operations prescriptions.

Progress to Date:

1. **Completed:** As discussed, (Finding #1, Action #2), the Nipigon DLT has an annual work planning process to identify District workload versus available resources and to prioritize work.

Regarding the development of Forest Operations Prescriptions (FOPs) during the 2010 to 2017 audit term, the former licensee Long Lake Forest Products (LLFP) would have been responsible for the development of FOPs for areas that were harvested under its licence. Following the surrender of the LLFP licence in 2013, MNRF did not undertake harvesting activities however the District did contract silviculture projects for site preparation and tree planting in the Axel and Painter Lake blocks. FOPs were in place for these areas, and the documentation for these is stored on the Nipigon District file share (Geraldton server, Ogoki Forest, Ogoki FOPs folder).

The current Forestry Agreement with ADLP includes provisions for the licensee to meet the obligations of an SFL holder including the preparation of Annual Work Schedules and associated forest operations prescriptions. With the Forestry Agreement in place, the District workload pertaining to FOPs involves the verification of silviculture invoices submitted by the licensee for reimbursement as an Eligible Silviculture Expense (ESW) through the Forest Renewal Trust. FOP documentation is submitted along with the invoices for this work and is stored on the Nipigon District file share (Geraldton server, Ogoki Forest, Forest Renewal Trust folder & Ogoki FOPs folder). This District workload

is typical of that which would be the case under an SFL-managed forest, and it is within the District's capacity to manage.

2. **Completed:** As discussed, (Finding #1, Action #4), a Forestry Agreement was signed between MNRF and the Ogoki Forest licensee, Agoke Development Limited Partnership (ADLP). The agreement includes provisions for the licensee to meet the obligations of an SFL holder including the preparation of the AWS. Forest operations prescriptions certification is provided through the certification of the AWS and is confirmed or changed based on available information. Under the Forestry Agreement, ADLP has and continues to cover legal requirements with respect to the development of FOPs, contracting out this work and submitting claims for ESW through the Forest Renewal Trust.

Future Tracking Requirements:

1. No future tracking required
2. No future tracking required.

Finding #3:

Conifer renewal is not being monitored for tending as required by the FMP and the 2010 IFA recommendation.

Action Required:

1. Review Actions #3 and #4 pertaining to Recommendation #2 of the 2010 IFA Action Plan and Status report. Determine and summarize the amount of outstanding area renewed to conifer which did not receive an assessment for tending during the 2010- 2017 audit term and develop a strategy to address any backlog of conifer renewal assessments.
2. Review present district staff commitments, identify available resources, versus available budget to determine capacity requirements.
3. Negotiate a forest management agreement with prospective Ogoki Forest licensee(s) that includes provisions for the licensee to carry out silviculture work including monitoring of conifer renewal areas.

Progress to Date:

1. **Completed:** Actions #3 and #4 pertaining to Recommendation #2 of the 2010 IFA Action Plan and Status Report were reviewed. A summary of the amount of outstanding area that had not received assessments for tending during the audit term was produced. This summary was included in the 2017 IFA Action Plan root cause analysis, which is filed with the NWR office and on the Nipigon District file plan (Geraldton server, Ogoki Forest, Action Plan folder).

The strategy to address the backlog of areas requiring monitoring for tending was to include these areas as part of the monitoring in the 2019-2020 and 2020-2021 Annual Work Schedules. The backlog area was also factored into the Renewal Charge Analyses for 2019-2020 and 2020-2021. Through the Forestry Agreement that was to be implemented April 1, 2018, ADLP would fulfill the obligations of an SFL holder, including responsibilities for silviculture and associated monitoring, and would have these silviculture expenditures submitted as ESW for reimbursement through the Forest Renewal Trust.

2. **Completed:** Nipigon DLT has an annual work planning process to identify District workload versus available resources and to prioritize work (see Finding #1, Action #2). Regarding the monitoring of regenerating conifer stands post-harvest during the 2010 to 2017 audit term, the former licensee was responsible for this monitoring under its licence and the FMP. Following the surrender of the former license, Nipigon District MNRD did not undertake monitoring of any backlog conifer renewal areas.

The Forestry Agreement with ADLP includes provisions for the licensee to meet the obligations of an SFL holder including implementing the FMP and any monitoring requirements described therein. With the Forestry Agreement in place, the District workload pertaining to the monitoring of conifer renewal areas is typically be limited to the verification of silviculture invoices submitted by the licensee for reimbursement as ESW through the Forest Renewal Trust. This workload is within the District's capacity to manage.

3. **Completed:** As discussed, (Finding #1, Action #4), a Forestry Agreement was signed between MNRD and the Ogoki Forest licensee, Agoke Development Limited Partnership (ADLP). The Forestry Agreement includes provisions for the licensee to meet the obligations of an SFL holder including silviculture monitoring as per the FMP. ADLP contracts the services of GreenForest Management Inc. (GFMI), which includes services for silvicultural monitoring. This work is claimed as ESW for reimbursement through the Forest Renewal Trust.

Of the 1,808 hectares that were identified as requiring monitoring for tending, approximately 250 hectares were assessed ("Conifer Renewal Surveys") during the 2019-20 field season. The field work for these assessments was claimed as ESW for reimbursement through the FRT. The results of these assessments will be reported in the 2019-2020 Annual Report due November 15, 2020. Of the remaining area, approximately 1,190 hectares were found to be of an age more suitable for Free-to-Grow assessments and will instead be assessed for FTG status with other areas for which Supplemental Aerial Photography (SAP) imagery has been collected. The balance of the backlog area – approximately 350-360 hectares – has been scheduled as part of the monitoring planned in the 2020-2021 AWS.

Future Tracking Requirements:

1. No future tracking required.
2. No future tracking required.
3. No future tracking required.

Finding #4:

The roads and water crossings monitoring program that is outlined in Table FMP-18 of the Phase II FMP has not been followed.

Action Required:

1. Review of the roads and water crossing monitoring program of the Phase II FMP text (i.e. Section 8.7.4); tables (i.e. FMP-18); and Supplementary Documentation (i.e. Section 8.5) of the Phase II 2013-2018 FMP.
2. Review of past work completed, and strategy developed, namely; Recommendation #3 and the strategy developed from the 2010 IFA Action Plan and Status Report, along with any available information from the previous service provider regarding the Forest Access Monitoring and Tracking program.
3. Compile all available MNRF District reports (including FOIP reports) and MNRF Northwest Regional Engineering reports for past inspections and monitoring of roads and water crossings. All available spatial data for roads and water crossings will be compiled into a shapefile or geodatabase to facilitate the submission of required FMP, AWS and AR information products pertaining to roads and water crossings.
4. Review present district staff capacity and commitments against available financial resources and budget staff time in the annual District work plan to monitor MNRF-responsible roads and water crossings as per FMP-18.
5. Using the information obtained from the actions above, develop a formal Roads Monitoring and Tracking program that meets requirements outlined in the Phase II FMP and facilitates the production of the required applicable FMP, AWS and AR spatial information products.
6. Negotiate a forest management agreement with prospective Ogoki Forest licensee(s) that includes provisions for the licensee to meet obligations similar to that of a Sustainable Forest License holder including monitoring and reporting of roads and water crossings.

Progress to Date:

1. **Completed:** The roads and water crossing monitoring program described in the Phase II FMP text, tables and Supplementary Documentation has been reviewed by the MNRF District Management Forester and by ADLP as the Ogoki Forest licensee. The planned roads and water crossing monitoring was included in the 2018-2019 AWS and subsequent AWSs that have been submitted to date. The reporting of this monitoring will be included in the applicable text and spatial products of the corresponding Annual Reports.
2. **Completed:** The past work completed, and the strategy developed to address Recommendation #3 of the 2010 IFA Action Plan and Status Report was reviewed by the MNRF District Management Forester and by ADLP as the Ogoki Forest licensee. Documentation of how the Forest Access and Monitoring Program (FAMT) program would be implemented was included in the 2019-2020 AWS and the current 2020-2021 AWS.

3. **Completed:** All known and available information pertaining to Ogoki Forest roads, water crossings, and inspections thereof, have been compiled by the District (Nipigon file plan, Ogoki folder). The information is a collection from various sources including MNR Forest Operations Inspection Program (FOIP) reports, NWR bridge inspections, provincial roads and water crossing data, and historical records that were included in the so-called "Surrender data" submitted to the MNR following the surrender of the former SFL.

A subset of the historic surrender data included hard copy inspection reports with the UTM coordinates of crossing locations. These records were digitized, and a shapefile was created for spatial reference. Available water crossing location data was compiled into a shapefile as a master list, which has been used to create the Scheduled Water Crossings (SWC) layer for the Annual Work Schedules. Some discrepancies in the master list have been noted with the water crossing ID's of some records. The MNR District Forester and GFMI (on behalf of ADLP) have discussed this issue and have committed to resolving the issue prior to the final submission of the 2020-2030 Ogoki FMP.

4. **Completed:** Nipigon DLT has an annual work planning process to identify District workload versus available resources and to prioritize work (see Finding #1, Action #2). Nipigon District MNR was part of a provincial Roads and Water Crossings program during the 2016-2017, 2017-2018 and 2018-2019 operating years. The District dedicated an estimated 240 person days toward this work, which involved an inventory of road and water crossing infrastructure as well as work with NWR Engineering section to carry out removals of derelict bridges in 2018-2019. Going forward, roads and water crossing monitoring will be coordinated with regular District compliance monitoring work. By coordinating efforts with the compliance program, the District is able to save staff resources and travel time to reach the Forest.
5. **On-Going:** Discussions were held between the District Forester and GreenForest Management Inc. (GFMI), on behalf of ADLP, regarding the implementation of the FAMT program. The FAMT program was originally developed in 2011 to address a Recommendation (#3) of the 2010 IFA report. It was implemented during the 2012-2013 AWS, but it was not continued beyond the time of the former SFL surrender in 2013.

The purpose of the FAMT program is to assign staff responsibility for the tracking of monitoring activities, prioritize monitoring in accordance with the schedule in the FMP, and to facilitate record keeping supporting the preparation of Annual Reports. During discussions with MNR, GFMI shared a tracking form they had previously developed, that could be filled out by operations and compliance staff while working in the field. MNR District staff created an electronic form based on the GFMI template for use on tablets or other electronic devices while staff are conducting field work. The main priority for the re-start of the FAMT program was to provide a reliable and low-tech means of gathering the required information. The understanding is that the program may evolve over time to incorporate more sophisticated means of data capture as the technology available to MNR and Industry staff allows. At present the FAMT program is meeting the basic requirement to collect roads and water crossings information in order to prioritize monitoring, maintenance and repair work, and to facilitate

annual reporting. The MNRF Nipigon District Management Forester will work with the licensee, ADLP, and GFMI, service provider and plan author for the 2020-2030 Ogoki Forest Management Plan, to reconcile discrepancies in water crossing data prior to the final submission of the 2020-2030 Ogoki FMP.

A description of the FAMT program, including roles and responsibilities of MNRF and Industry staff for the monitoring of roads and water crossings was included in the 2019-2020 and 2020-2021 AWSs. All roads and water crossings scheduled for monitoring are identified in the applicable AWS spatial information products, as per the FIM AWS Technical Specifications. Program results will be reported in the Annual Reports beginning with the 2019-2020 AR due November 15, 2020.

6. **Completed:** As discussed, (Finding #1, Action #4), a Forestry Agreement was signed between MNRF and the Ogoki Forest licensee, Agoke Development Limited Partnership (ADLP). The Forestry Agreement includes provisions for the licensee to meet the obligations of an SFL holder including roads and water crossing monitoring as per the FMP. ADLP with its service provider, GFMI implemented the re-start of the FAMT program during the 2019-2020 operating year. The FAMT program, and associated roles and responsibilities of staff was presented at the 2019-2020 Annual AWS Start-up Meeting. The results of the program will be reported in the 2019-2020 and subsequent AR's.

Future Tracking Requirements:

1. No future tracking required.
2. No future tracking required.
3. No future tracking required.
4. No future tracking required.
5. Future ARs, FAMT records, FOIP inspections/reports
6. No future tracking required.

Finding #5:

There are gaps in capacity and information management systems to support sustainable forest management of the Ogoki Forest.

Action Required:

1. Review current District staff capacity, commitments and available financial resources against a list of forest management functions for which the MNRF is responsible in the absence of an SFL holder and identify gaps in capacity.
2. Negotiate a forest management agreement with prospective Ogoki Forest licensee(s) that includes provisions for the licensee to meet obligations similar to that of a Sustainable Forest License holder including production of the required annual products (AR, AWS), carrying out eligible silviculture work and forest operations compliance inspections and reporting.

Progress to Date:

1. **Completed:** As the Crown forest manager in the absence of an SFL holder, Nipigon District MNRF is responsible for a suite of functions to ensure the sustainable management of the Ogoki Forest. These are as listed under the

Forestry Futures Trust Forest Management component process document and include work functions among the following six categories: 1) Forest Management Planning, 2) Annual Plan Follow Up, 3) Information Management, 4) Compliance Monitoring, 5) Operations, and 6) Audit and Certification.

As discussed, Nipigon DLT has an annual work planning process to identify District workload versus available resources and to prioritize work (Finding #1, Action #2). The Nipigon DLT recognizes that there are gaps in its capacity to manage a forest in the same manner as it would with an SFL in place. Nipigon DLT also recognizes that it has experienced staff turnover and vacancies during the 2010 to 2017 audit term. In its annual workplan, the District sets out priorities and these are reviewed on an ongoing basis. Nipigon DLT continues to explore opportunities to backfill positions or hire contract staff as these opportunities arise. As work priorities may shift and change from year to year depending on FMP development stages, the Resource Management Supervisors and Management Forester will hold a bi-annual meeting to discuss workload pertaining to the Ogoki Forest. The first meeting would be held in May during the development of the District work plan and the second meeting in November as a review and check-in.

Many of the gaps in capacity identified in the 2017 IFA report are being addressed through the implementation of the Forestry Agreement between MNRF and the Ogoki Forest licensee, ADLP. The Forestry Agreement is an interim forest management approach that requires ADLP to meet the obligations of an SFL holder as set out in the Forest Management Planning Manual and the Crown Forest Sustainability Act. Nipigon District MNRF is supportive of ADLP in this role as the company continues to build upon its capacity to ensure the sustainable management of the Ogoki Forest.

2. **Completed:** As discussed, a Forestry Agreement was signed between MNRF and the Ogoki Forest licensee, Agoke Development Limited Partnership (ADLP). The Forestry Agreement includes provisions for the licensee to meet the obligations of an SFL holder including the production of required annual products (AR, AWS), carrying out eligible silviculture work and forest operations compliance inspections and reporting. Please refer to the progress to date on Actions related to Findings #2, #3, #4, #6, #9 and #10 for more details on how the implementation of the Forestry Agreement has helped to address gaps that Nipigon District has had in capacity to manage the Ogoki Forest.

Future Tracking Requirements:

1. No future tracking required.
2. No future tracking required.

Finding #6:

Compliance monitoring was not completed for all activities in the forest.

Action Required:

1. Review and summarize backlog and current areas of operations that have not received compliance inspections as well as any FOIP reports that may not be closed off.

2. Review the 2008-2018 Ogoki FMP Ten-Year Strategic Compliance Plan that was updated for Phase II planned operations (FMP text section 8.7.1) and develop an Annual District Compliance plan for the 2018-2019 AWS and subsequent AWSs.
3. Review and produce a list of current District staff compliance capacity and commitments against available financial resources. Arrange for compliance inspector training for staff where capacity exists.
4. Negotiate a forest management agreement with prospective Ogoki Forest licensee(s) that includes provisions for the licensee to meet obligations similar to that of a Sustainable Forest License holder including forest operations compliance monitoring and reporting.

Progress to Date:

1. **Completed:** The compliance reporting backlog was reviewed. The former SFL was surrendered during the 2010 to 2017 audit time period in 2013, therefore the majority of forest operations for which compliance inspections were planned, did not occur. Site preparation and tree plant activities were successfully carried out during the 2014-2015 operating year, but compliance reporting was not completed for these activities. Approximately 150 hectares that underwent site preparation in 2014-2015 was planted in 2017-2018. A renewal inspection was completed for this area and was found to be "In Compliance" (FOIP Inspection #682147). Areas of current forest operations on the Ogoki Forest are tracked in an Operations Summary spreadsheet, that is stored on the Nipigon District file share (Geraldton server, Ogoki folder).
2. **Completed:** The Ten-Year Strategic Compliance Plan from the 2008-2018 Phase II Ogoki FMP was reviewed. An Annual Compliance Plan for the Ogoki Forest was developed and included in the 2018-2019 Ogoki AWS (Appendix C), and subsequent AWSs that have been approved and implemented to date. The Nipigon District Annual Compliance Operations Plan (ACOP) is updated annually in conjunction with District work planning activities. The Nipigon DLT has incorporated targets for compliance inspections into the District work plan(s) for technicians to conduct at least a minimum number of inspections per month, and to submit the associated FOIP reports.
3. **Completed:** The District staff compliance capacity is reviewed on an ongoing basis as staff resources change in response to vacancies related to attrition or shifts in resources as staff fulfill acting positions. The District has arranged for compliance inspector training for Resource Management Technician (RT3) positions that have been filled in recent years. Nipigon DLT will continue to seek out compliance inspector training through the Forest Operations Inspection Program as these opportunities arise, and as vacant RT3 positions become filled.
4. **Completed:** As discussed, a Forestry Agreement was signed between MNRF and the Ogoki Forest licensee, Agoke Development Limited Partnership (ADLP). The Forestry Agreement includes provisions for the licensee to meet the obligations of an SFL holder including forest operations compliance monitoring and reporting. ADLP has contracted out the services of GreenForest Management Inc., who employs certified compliance inspectors to carry out inspections of forest operations on the Ogoki, on behalf of the licensee. ADLP plans to increase its capacities with respect to compliance monitoring and reporting by having staff become certified as

compliance inspector(s) as training opportunities through the provincial compliance program arise.

Future Tracking Requirements:

1. No future tracking required.
2. No future tracking required.
3. No future tracking required.
4. No future tracking required.

Finding #7:

Annual Reports were not submitted and approved in a timely manner and contained technical errors.

Action Required:

1. Review 2017-2018 and future AR submission cover pages for accuracy and agreement prior to acceptance or approval by District Manager, Regional Director and submission to the Forest Information Portal (FIPortal).
2. Review 2017-2018 and future AR tables and figures against submission text for accuracy and agreement before acceptance or approval by District Manager, Regional Director and submission to the FIPortal.
3. Review 2017-2018 and future AR GIS Layers against AR tables for accuracy and agreement before accepting or approving in the FIPortal.
4. Review 2014-2015 AR for approval and submission to the FIPortal and posting on eFMP site.

Progress to Date:

1. **Completed:** The 2017-2018 and subsequent years Annual Reports submitted to date have had the AR submission cover pages reviewed for accuracy and agreement prior to the AR acceptance or approval and submission to the Forest Information Portal (FIPortal).
2. **Completed:** The 2017-2018 and subsequent years Annual Reports submitted to date have had the AR tables and figures reviewed against the AR text for accuracy and agreement prior to the AR acceptance or approval and submission to the FIPortal.
3. **Completed:** The 2017-2018 and subsequent years Annual Reports submitted to date have had the AR GIS Layers reviewed against the AR tables for accuracy and agreement prior to the AR acceptance or approval and submission to the FIPortal.
4. **Partially Completed:** The 2015-2015 Annual Report and associated action has been partially completed due to competing priorities related to regular annual work, work associated with forest operations compliance issues, external project reviews, capital projects, and work associated with being in the development stage of the 2020-2030 Ogoki FMP. The MNR District Management Forester, along with the Regional Planning Forester and Forest Management Specialist will review the 2014-2015 Annual Report to be submitted November 15, 2020.

Future Tracking Requirements:

1. No future tracking required.
2. No future tracking required.
3. No future tracking required.
4. Approved 2014-2015 Annual Report.

Finding #8:

Nipigon District has not met the requirements of the Phase II Planned Operations silvicultural monitoring program for the Ogoki Forest.

Action Required:

1. Consolidate all District SEM records and reports for the Ogoki Forest onto the district shared drive and share with MNR Regional Forest Operations Specialist.
2. Review the silvicultural monitoring program in the approved FMP and identify missing FTG, SEM survey information including reports and analyses. Produce a summary of missing information to determine the extent of any backlog of Natural Regeneration, Post Establishment Regeneration, and Free-to-Grow/Successful Regeneration Assessments.
3. Review audit finding evidence and produce a summary of outstanding work to be completed for FTG and SEM survey areas. Develop a plan to complete required surveying on areas eligible for the assessments described in the FMP and in (2) above. It is understood that much of the area that may have previously been eligible for Natural Regeneration and Post Establishment Regeneration Assessments is now past the appropriate timing (i.e. years since establishment) for such surveys and may have reached the minimum age for FTG assessments and instead be planned for these surveys.
4. Review present district staff commitments, identify available resources, versus available budget to determine capacity requirements.

Progress to Date:

1. **Completed:** All District silviculture effectiveness monitoring (SEM) records and reports for the Ogoki Forest were consolidated and stored on the Nipigon District file share (Nipigon server, Ogoki SEM folder), and shared with the MNR Regional Forest Operations Specialist.
2. **Completed:** The silvicultural monitoring program of the 2008-2018 Ogoki FMP was updated for implementation of Phase II of the FMP (Section 8.7.2 and Supplementary Documentation 8.4). Apart from the monitoring described in this section of the FMP, there is no FMP text specific to the details of the silviculture effectiveness monitoring program that is carried out by MNR, separate from the monitoring work that is normally carried out by the SFL holder. During the 2010 to 2017 audit period, Nipigon District staff carried out various levels of SEM work each year, with the exception of 2013 and 2014. In general, any areas that are eligible for, but that do not receive SEM assessments in a given year may be carried forward into future years SEM work.

The extent of the silvicultural monitoring backlog included areas that required assessments for FTG status, and regeneration assessments ("Post Establishment Regeneration Assessments" under the Phase II FMP). These areas were

summarized for inclusion into the monitoring programs described in the 2018-2019, 2019-2020 and 2020-2021 AWSs.

3. **Completed:** As discussed above, areas requiring silvicultural monitoring were summarized and included in the Annual Work Schedules that have been submitted to date, since 2018-2019. FTG assessments were required on approximately 57,000 hectares of regenerating forest. The progress made to date to address this work is described under Finding #9 below. Post Establishment Regeneration assessments were required on approximately 1808 hectares of regenerating forest. These were areas that had been renewed to conifer-dominated forest unit, but that had not been assessed to determine if tending was required. The progress made to date to address this work is described under Finding #3 above.
4. **Completed:** As discussed, Nipigon DLT has an annual work planning process to identify District workload versus available resources and to prioritize work. The Nipigon DLT recognizes the importance of the SEM program in helping to inform aspects of forest management and silvicultural planning. As part of annual District work planning, DLT establishes targets for the number of days that staff are expected to conduct SEM each month. Among many other resource management projects that are carried out by the District, Nipigon was able to implement limited SEM programs on the Ogoki Forest during the 2017-2018 and 2018-2019 field seasons. Planning was completed (office tasks) for an SEM program in 2019-2020, but assessment work did not occur due to other significant projects in the District that had priority status (e.g. Bear Hair project and capital projects). As well, staff resources at the Geraldton area MNR office have been at half of their normal complement due to vacancies in the Resource Management Technician (RT3) positions. Going forward, Nipigon DLT will continue to evaluate staff workload and priorities in order to carry out resource management programs such as SEM.

Future Tracking Requirements:

1. No future tracking required.
2. No future tracking required.
3. No future tracking required.
4. No future tracking required.

Finding #9:

There is a large backlog of regenerated area in the Ogoki Forest that has not been assessed for Free-to-Grow status.

Action Required:

1. Review the FTG silvicultural monitoring program in the approved FMP. Identify areas that require FTG survey work. Produce a summary of areas to be surveyed and incorporate these into the 2018-2019 AWS and subsequent AWSs.
2. Review current district staff capacity and commitments against available financial resources and incorporate District workload into the annual work plan.
3. Negotiate a forest management agreement with prospective Ogoki Forest licensee(s) that includes provisions for the licensee to meet obligations similar to that of a Sustainable Forest License holder including eligible silviculture work and associated monitoring and reporting.

Progress to Date:

1. **Completed:** The Monitoring Program for Regeneration Success from the approved 2008-2018 Phase II Ogoki FMP (Section 8.7.2 and Supplementary Documentation 8.4) was reviewed. Free-to-Grow (FTG) assessments are one component of this program. The areas requiring FTG assessment work represented a backlog of area that had been harvested and regenerated under the management of the former SFL but had not yet been assessed for FTG status.

A summary of the areas deemed eligible for FTG assessments was produced and incorporated into the 2018-2019 AWS via Revision #2018-002 – Addition of the Scheduled Establishment Assessment (SEA) layer, as per the 2017 FMPM and FIM requirements. In the development of the 2019-2020 and 2020-2021 Annual Work Schedules, the balance of the area that had not yet been assessed was incorporated into the respective spatial products (SEA layers) and reflected in the Monitoring and Assessment section of the AWS text.

2. **Completed:** As discussed, Nipigon DLT has an annual work planning process to identify District workload versus available resources and to prioritize work. The work associated with conducting FTG assessments is considered eligible silviculture work under the Forest Renewal Trust Claims Process, and the contracting of this service is a function that would normally fall under the responsibility of an SFL holder. While the District did not undertake work to oversee a large-scale FTG survey following the surrender of the previous SFL in 2013, District staff did complete ground-based FTG surveys through its Silviculture Effectiveness Monitoring (SEM) program.

With the Forestry Agreement in place, the District workload pertaining to FTG assessments consists of the verification of silviculture invoices submitted by the licensee for reimbursement as ESW through the Forest Renewal Trust. This workload is within the District's capacity to manage.

3. **Completed:** As discussed, a Forestry Agreement was signed between MNRF and the Ogoki Forest licensee, Agoke Development Limited Partnership (ADLP). The Forestry Agreement includes provisions for the licensee to meet the obligations of an SFL holder including undertaking eligible silviculture work such as Free-to-Grow monitoring and reporting.

ADLP contracts the services of GreenForest Management Inc. (GFMI), which includes services for FTG monitoring and reporting. To date there has been significant progress in addressing the backlog of FTG assessments. Approximately 890 hectares were ground-surveyed during the 2018-2019 field season, and 26,622 hectares were captured in areas that were flown for SAP imagery during the 2019-2020 season. The balance of the area that was not yet ground-surveyed or flown was included in the SEA layer of the 2020-2021 AWS, and plans are underway for the licensee to enter contracts to have these areas surveyed in 2020. The results of FTG assessments conducted in each year will be reported in the 2019-2020 and 2020-2021 Annual Reports, due November 15th of each year, respectively.

Future Tracking Requirements:

1. No future tracking required.
2. No future tracking required.

3. No future tracking required.

Finding #10:

A slash management program was not implemented in the Ogoki Forest over the audited period as required by the FMP.

Action Required:

1. Review section 8.2.2.2 of the FMP and licence conditions pertaining to slash management with licensee(s) at Annual Work Schedule Start-up meetings.
2. Ensure plans are underway for the licensee to address required slash treatment operations and identify planned treatment areas and inspections for these in the 2019-2020 AWS.
3. Negotiate a forest management agreement with prospective Ogoki Forest licensee(s) that includes provisions for the licensee to carry out slash management as required under the FMP.

Progress to Date:

1. **On-Going:** Section 8.2.2.2 of the 2008-2018 Ogoki FMP (Conditions on Regular Operations – Loss of Productive Land), and the licence conditions that require the licensee to conduct slash management in accordance with the FMP, have been reviewed as part of the review of Areas of Concern (AOCs) and Conditions on Regular Operations (CROs) at the Annual Work Schedule Start-up meetings. Records of the annual start-up meeting agenda(s) and participants are stored on the Nipigon District file share (Geraldton server, Ogoki AWS folder).
2. **Completed:** Plans for slash and debris management were included in the 2019-2020 Annual Work Schedule, with specific blocks prioritized for slash management identified in the AWS text. Implementation of slash management activities was also identified as a compliance priority in the Annual Compliance Plan of the AWS.
3. **Completed:** As discussed, a Forestry Agreement was signed between MNRF and the Ogoki Forest licensee, Agoke Development Limited Partnership (ADLP). The Forestry Agreement includes provisions for the licensee to meet the obligations of an SFL holder that includes conducting slash management activities as per the FMP. The licensee has made progress by preparing contract packages and invitations to bid on this eligible silviculture work, working to coordinate slash management with planned site preparation, and working with Nipigon District MNRF to close compliance issues and release harvest areas to allow silviculture activities to proceed.

Future Tracking Requirements:

1. Future AWS start-up meeting agendas, minutes and attendance records, future AWSs, ARs and forestry agreements.
2. No future tracking required.
3. No future tracking required.