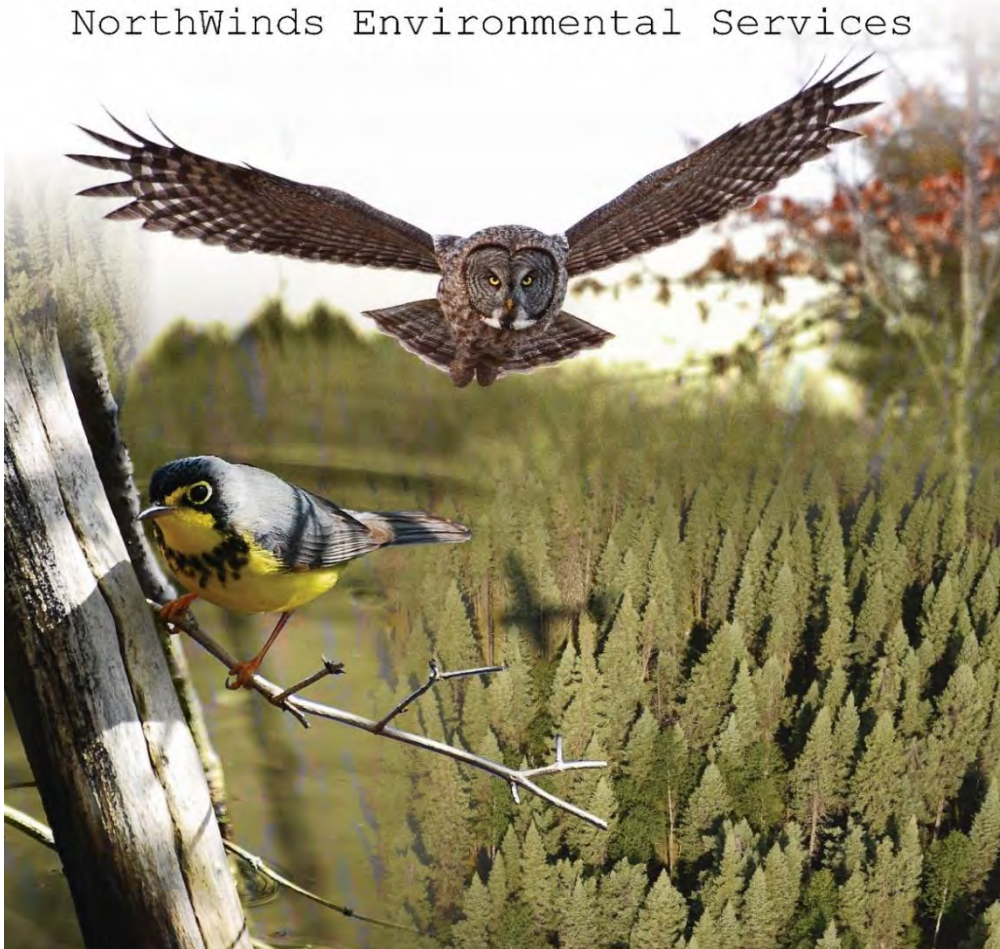




NorthWinds Environmental Services



Final Report

Missinaibi Forest 2024 Independent Forest Audit: April 1, 2016 to March 31, 2024

Report Date: December 5, 2024

Prepared by:
NorthWinds Environmental Services

King's Printer for Ontario, 2024

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1 EXECUTIVE SUMMARY

In Ontario, Independent Forest Audits are done every ten to twelve years to assess Sustainable Forest licence holder and Ministry of Natural Resources compliance with the Ontario Forest Management Planning Manual and the *Crown Forest Sustainability Act*. The audits also assess the effectiveness of forest management activities for meeting objectives that are set in the forest management plan. The Independent Forest Audits are an opportunity to improve Crown forest management in Ontario through adaptive management.

The 2024 audit of the Missinaibi Forest was done by NorthWinds Environmental Services, a forestry and environmental services company based out of Thunder Bay, Ontario. The Forest is licensed to Missinaibi Forest Management Inc. under the terms and conditions of Sustainable Forest License #550390. It is made up of the combined former Martel and Magpie Forest Management Units. Missinaibi Forest Management Inc. and the Ministry of Natural Resources are responsible for the operation and administration of the Forest under the terms and conditions of the 2021-2031 Missinaibi Forest Management Plan. Another company, GreenFirst, provides forest management services. Administratively, the Forest is located within the Ministry of Natural Resources Northeast Region and within the Chapleau/Wawa District. The District Ministry of Natural Resources leads forest management planning and oversight on the Missinaibi Forest, with staff located in both the Chapleau and Wawa work centres.

The audit term was April 1, 2016, to March 31, 2024. Within scope of the audit was:

- Implementation of Phase II Years 7, 8, 9, 10 of the 2011-2021 Martel Forest Management Plan
- Implementation of Phase II Years 8, 9, 10 of the 2009-2019 Magpie Forest Management Plan
- Preparation and implementation of years 1 and 2 of the 2019-2022 Magpie Contingency Plan
- Preparation of the 2021-2031 Missinaibi Forest Management Plan and implementation of years 1, 2, 3 of the Plan

The audit team found that the 2019-2021 Magpie Forest Contingency Plan and the 2021-2031 Missinaibi Forest Management Planning processes generally met the requirements laid out in Ontario's 2020 (and prior versions) Forest Management Planning Manual. The Covid-19 pandemic posed challenges for in-person public engagement and First Nations and Métis consultation. The Ministry of Natural Resources and the Sustainable Forest Licence holder made efforts to ensure that critical information was available to the public. There was an audit finding related to documentation of First Nation and Métis engagement in the 2021-2031 Missinaibi FMP process. However, the audit team also noted a best practice for the collaborative approach between First Nations, the Sustainable Forest Licence holder and the Ministry of Natural Resources to work toward reducing herbicide use on the Forest.

Forest management activities in the Missinaibi Forest were implemented in accordance with the three applicable Forest Management Plans over the audit term. Harvest and renewal operations were well-conducted, forest aggregate pits were rehabilitated appropriately, wildlife

and values protection were implemented as planned and most water crossings were well-built and maintained. Minor exceptions noted included some perched culvert installations that could affect fish passage (one finding). Other minor issues resulting from road grading that could contribute to siltation into streams were also observed and discussed.

Most of the recommendations from the previous 2016 Magpie Forest and 2017 Martel Forest Independent Forest Audits were resolved appropriately. However, the status reports were missing quantitative measures for some indicators that would allow the audit team to conclude that past findings were effectively addressed (one finding). These included findings related to Ministry of Natural Resources Chapleau/Wawa District recruitment efforts for the Local Citizens Committee (one finding). Observations made during the field audit suggest that the current level of slash management and road construction does not appear to align with modelled targets related to the loss of productive land (one finding). These two findings are carried forward in the 2024 audit. A summary of progress on findings directed to Corporate Ministry of Natural Resources was not included in Independent Forest Audit status reports and could not be assessed by the audit team.

Annual Reports and Annual Work Schedules were prepared for each year of the audit period and were compliant with Ontario's Forest Management Planning Manual, with minor exceptions noted. Both the Sustainable Forest Licence holder and Ministry of Natural Resources compliance programs to monitor Forest Management Plan implementation were carried out appropriately.

The audit team concludes that apart from five audit findings, the management of the Missinaibi Forest was in compliance with the Forest Management Planning Manual and the *Crown Forest Sustainability Act* during the April 1, 2016 to March 31, 2024 audit term. Forest management planning, operations, monitoring and reporting activities have been effective in contributing to meeting the objectives set out in the applicable forest management plans, with minor exceptions as noted. Missinaibi Forest Management Inc. is in compliance with the terms and conditions of the Sustainable Forest License No. 550390.

Stamped and signed by: Henrike Burkhardt, R.P.F., Lead Auditor



Date: December 3, 2024

Audit findings must be addressed by Missinaibi Forest Management Inc. and/or the Ministry of Natural Resources. These are summarized in the following Table of Findings (Table 1).

Table 1. Summary table of the Missinaibi 2024 Independent Forest Audit findings and best practices.

TABLE OF AUDIT FINDINGS AND BEST PRACTICES
Concluding statement
The audit team concludes that apart from five audit findings, the management of the Missinaibi Forest was in compliance with the Forest Management Planning Manual and the <i>Crown Forest Sustainability Act</i> during the April 1, 2016 to March 31, 2024 audit term. Forest management planning, operations, monitoring and reporting activities have been effective in contributing to meeting the objectives set out in the applicable forest management plans. Missinaibi Forest Management Inc. is in compliance with the terms and conditions of the Sustainable Forest License No. 550390.
Audit Findings
<p>Finding #1: The documentation for the 2019 Magpie Contingency Plan and 2021 Missinaibi Forest Management Plan did not meet the Forest Management Planning Manual requirements for First Nation and Métis consultation as follows:</p> <ul style="list-style-type: none"> a) The summaries of First Nation and Métis consultation for the 2019 Magpie Contingency Plan and 2021 Missinaibi Forest Management Plan as provided do not include sufficient documentation to assess the extent of engagement or nature of any concerns identified, or in some cases the Ministry's responses. b) The Report on the Protection of Identified First Nation and Métis Values for the 2021 FMP was not updated.
Finding #2: Chapleau/Wawa District Ministry of Natural Resources could not provide evidence of efforts to implement a wider range of approaches to support the growth and retention of a diverse Local Citizens Committee. This finding is carried forward from the 2017 Martel Forest Independent Forest Audit.
Finding #3: The current level of slash management and road construction observed during the field audit does not appear to align with modelled targets related to the loss of productive land.
Finding #4: Not all water crossings were installed consistent with the Ministry of Natural Resources/Fisheries and Oceans Canada Protocol for the Review and Approval of Forestry Water Crossings, 2020.
Finding #5: Both the Magpie 2016 and Martel 2017 Independent Forest Audit action plans and status reports were lacking quantitative measures that would allow a conclusive assessment of progress to address some previous Independent Forest Audit findings.
Best Practice #1: Local First Nations communities, the Ministry of Natural Resources and GreenFirst are working collaboratively and in good faith to identify and implement alternatives to herbicide use on the Missinaibi Forest.

2 INTRODUCTION

2.1 AUDIT PROCESS

Independent Forest Audits (IFAs) are a requirement of the *Crown Forest Sustainability Act* (S.O. 1994, c. 25) (*CFSA*). IFAs assess both the Sustainable Forest Licence (SFL) holder and the Ministry of Natural Resources (MNR) compliance with the Forest Management Planning Manual (FMPM) and the *CFSA* in conducting forest management planning, operations, monitoring and reporting activities. The audit also assesses the effectiveness of forest management activities in meeting the objectives set out in the forest management plan (FMP). Every forest management unit in Ontario is required by law to be audited by an independent audit team every ten to twelve years. The key source of direction for the IFA comes from the Independent Forest Audit Process and Protocol (IFAPP)¹.

IFAs are governed by eight guiding principles, as described in the 2024 IFAPP:

1. Commitment
2. Public consultation and First Nation and Métis involvement and consultation
3. Forest management planning
4. Plan assessment and implementation
5. System support
6. Monitoring
7. Achievement of management objectives and forest sustainability
8. Licence and contractual obligations

The IFAPP includes a set of audit protocols that are designed to provide a systematic review of the forest management and operational activities in Ontario forest management units. Audit “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” in cases where auditees’ actions go above and beyond legal requirements and result in positive outcomes for forest and communities. The audit reports and action plans to address the findings are published on the Ontario Government website: <https://www.ontario.ca/page/independent-forest-audits>. Progress towards the completion of actions will be reported on in annual reports available through the Natural Resources Information Portal: https://nrip.mnr.gov.on.ca/s/nrip-busline?language=en_US.

On the Missinaibi Forest, the auditees include: the SFL holder (Missinaibi Forest Management Inc.), Chapleau/Wawa District MNR, Northeast Region MNR and Corporate MNR. The 2024 IFA for the Missinaibi Forest covered the eight-year period from April 1, 2016, to March 31, 2024. The audit was led by NorthWinds Environmental Services (NWES), a forestry and environmental

¹ Ontario Ministry of Northern Development, Mines, Natural Resources and Forestry. 2024. Independent Forest Audit Process and Protocol. Copyright ©Queens Printer.

services firm based out of Thunder Bay, Ontario. The audit team members, their roles and qualifications are described in Appendix 6.

At the onset of the audit, the audit team conducted a forest management unit risk assessment to verify that the subset of optional audit protocols included in the IFAPP would enable a thorough review of all management and operations on the Missinaibi Forest. The applicability of additional protocols based on potential issues identified during the preliminary document review and interviews was assessed. The audit team identified five optional procedures as posing sufficient risk to be included in the 2024 Missinaibi IFA, as outlined in Table 2.

Table 2. Optional protocols requiring inclusion in the 2024 Missinaibi Forest IFA

Principle & Criteria	Procedure	Description & Rationale	Probability	Impact	Risk
2.1.1	1	LCC establishment & terms of reference There was a finding in the 2017 Martel IFA that required the review of the TOR The interviews also indicated concerns related to the LCC in relation to the amalgamation of the Martel and Magpie Forests as well as concerns related to the overall function of the LCC	Medium	Medium	Yes
2.3	1	Issue resolution There were two issue resolution requests during the 2021 Missinaibi FMP planning process	Low	Medium	Yes
5.1	1	Human Resources There were many changes in the Forest as a result of the merger of the Magpie and Martel Forest. With the merger, GreenFirst took over management of the Magpie portion of the Forest from MNR. In addition, human resource issues in MNR were highlighted in previous IFA. A majority of the	Medium	High	Yes

Principle & Criteria	Procedure	Description & Rationale	Probability	Impact	Risk
		current management positions are filled with newer staff.			
5.2	1	Document and record quality control There has been concern with the document control with Wawa district as it pertains to the LCC consultation record (2017 Martel IFA) and First Nation and Métis.	Medium	High	Yes
6.2.1	4	Determine whether an effective internal compliance prevention/ education program, which met MNR competency standards, was developed, subsequently delivered and available to all forest workers and partners Limited qualified staff, high staff turnover, new training process requirements and availability of qualified trainers.	Medium	High	Yes
6.2.2	1	Review and analyze the performance, efficiency and effectiveness of specified 'delegation' to qualified Overlapping Licensees and overall performance of the Overlapping Licensee in delivering their responsibilities Based on interviews, there may be some issues with some licensees fulfilling all of their obligations.	Medium	Medium	Yes
8.1.17	1	Internal compliance prevention/education program	Low	High	Yes

Principle & Criteria	Procedure	Description & Rationale	Probability	Impact	Risk
		New training process requirements and availability of qualified trainers.			

The Missinaibi Forest was established in 2021 through the amalgamation of the former Magpie and Martel Forests. As such, there are two previous IFA reports relevant to this audit: the Magpie Forest IFA report covered the period from 2011-2016, and the Martel IFA report covered the period from 2012-2017. The audit team reviewed the previous IFA reports, their associated action plans, and the action plan status reports.

The 2016 Magpie and 2017 Martel Independent Forest Audits included 17 recommendations and 12 findings respectively, with follow-up by assigned parties described in 2019 and 2020 Status Reports. Findings directed at Corporate MNR are not included in the Status Reports. As such, the audit team could not comment on whether those findings were addressed.

A review of these documents found that status reports were provided for each audit finding, however, in five examples, quantitative information that would support a definitive conclusion about progress on audit findings was lacking. Some of the findings that are carried forward in this audit report include those related to the LCC and slash management, the latter as it relates to loss of productive forest area and plan targets. Specific examples are detailed in Appendix 1.

The audit sought First Nation and Métis, stakeholder and public input through advertising in media outlets and social media, and notices issued using the forest management planning mailing list. A thorough review of documentation and records associated with management of the Missinaibi Forest during the audit term was undertaken. The field audit was conducted by road from September 17-18, as well as one day by helicopter on September 19, 2024. At minimum, the audit team sampled 10% of all activities taking place in the management unit during the audit period, including forest harvest and related operations, a range of silvicultural treatments, road building and maintenance, water crossings and forestry aggregate pits.

This report describes the audit team's findings in relation to the eight IFA principles listed above. More details on procedures, review, sampling and consultant can be found in the following Appendices:

Appendix 1 - Detailed audit findings

Appendix 2 - Review of the achievement of objectives

Appendix 3 – Review of contractual obligations

Appendix 4 - Information on the audit process

Appendix 5 - List of acronyms

Appendix 6 - Audit team members and their qualifications

2.2 MANAGEMENT UNIT DESCRIPTION

The Missinaibi Forest was formed in 2021 by amalgamating the former Martel and Magpie Forests. In November 2021, the Minister approved the extension of the SFL term from March 31, 2022 to March 31, 2041. Missinaibi Forest Management Inc (MFMI) holds the enhanced Sustainable Forest License (eSFL) for the Forest. The Board of Directors is represented by four First Nations, three municipalities and three forest products companies.² GreenFirst Forest Products staff provide a general manager, forest management and silvicultural services to MFMI. The Missinaibi Forest supplies conifer fibre to the GreenFirst sawmill in Chapleau. Columbia Forest Products, White River Forest Products and Hornepayne Lumber also receive fibre from the forest.

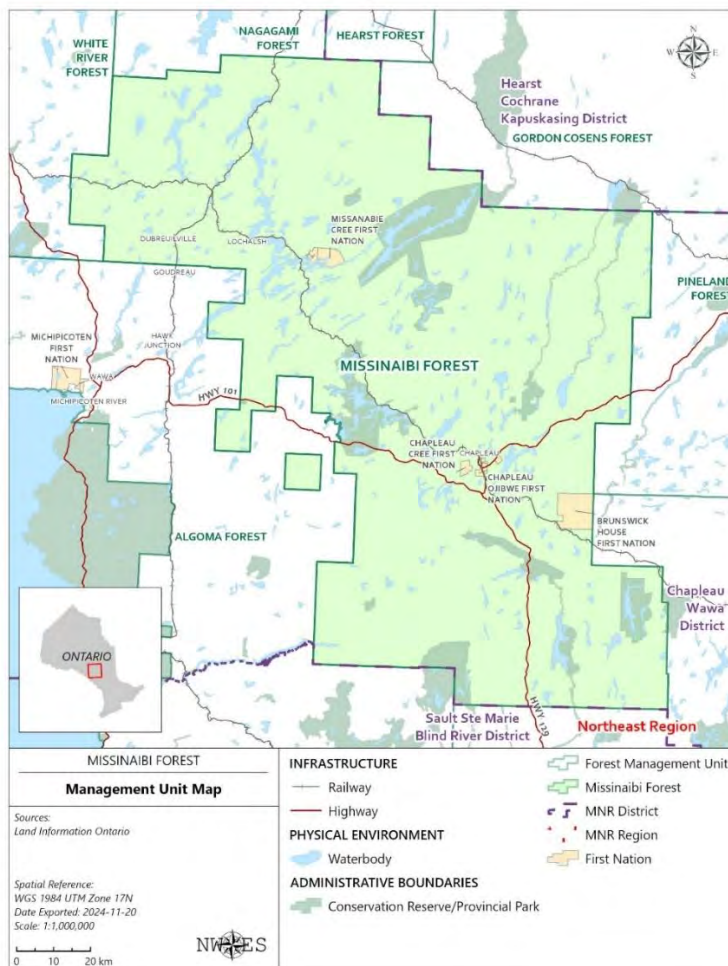


Figure 1. Location of the Missinaibi Forest.

² MFMI Board includes: First Nations - Brunswick House First Nation, Chapleau Cree First Nation, Missanabie Cree First Nation, Michipicoten First Nation. Municipalities – Chapleau, Dubreuilville, Wawa. Forest Products Companies: GreenFirst Forest Products Inc., Hornepayne Lumber Limited Partnership, Columbia Forest Products Ltd.

There are sixteen First Nation and Métis communities within or adjacent to the Forest that were included in consultation and outreach efforts that were required as part of developing the 2021-2031 Missinaibi Forest Management Plan. These include:

First Nations Communities

1. Batchewana First Nation
2. Biigtigong Nishnaabeg First Nation (formerly known as Ojibways of the Pic River First Nation)
3. Brunswick House First Nation
4. Chapleau Cree First Nation
5. Chapleau Ojibwe First Nation
6. Ketagaunseebee Garden River First Nation
7. Thessalon First Nation
8. Michipicoten First Nation
9. Missanabie Cree First Nation
10. Mississauga First Nation
11. Netmizaaggamig Nishaabeg (Pic Mobert)

Métis Communities

12. Bar River Métis Community
13. Métis Nation of Ontario, Region 2
14. Métis Nation of Ontario, Region 3
15. Métis Nation of Ontario, Region 4
16. Red Sky Métis Independent Nation

3 AUDIT FINDINGS

3.1 COMMITMENT

The commitment principle is deemed to be met for MFMI since the Missinaibi Forest is certified under a third-party, voluntary certification program (Forest Stewardship Council® (FSC) National Forest Stewardship Standard of Canada.) Third-party certification adds another level of oversight and transparency to the company's operations through assessments carried out by the certifying body, who post publicly available reports.

The MNR's commitment to sustainable forest management is demonstrated through the implementation of Ontario's comprehensive forest management policy framework, including independent audits, consistent with the requirements of the CFSA. These policies are communicated to resource users and the public through prescribed public consultation processes undertaken by the MNR. The MNR maintains a website where these commitments are available: <https://www.ontario.ca/page/forestry>. All forest management plans, annual reports and independent forest audit reports are also freely available online.

3.2 FOREST MANAGEMENT PLANNING

The audit team reviewed the preparation of the 2019-2021 Contingency Plan for the Magpie Forest and the preparation of the 2021-2031 Missinaibi Forest Management Plan. The audit team also reviewed the Annual Work Schedules (AWS) and Annual Reports (AR) within the audit term. With minor exceptions noted in the audit findings, the FMPs, AWSs and ARs met the requirements of the Ontario's Forest Management Planning Manual (FMPM) and Forest Information Manual (FIM). The CP and FMP met the minimum planning and consultation requirements, despite challenging circumstances for public engagement resulting from social distancing requirements during the Covid-19 pandemic.

The documentation of engagement with Indigenous communities on the 2019 Magpie CP and 2021 Missinaibi FMP provided for the audit was very general. It did not provide a clear picture of the nature of engagement, the concerns raised by local communities and how these were addressed by the MNR or the SFL holder in the forest management planning process. Furthermore, the draft Report on the Protection of Identified First Nation and Métis Values for the 2021 Missinaibi FMP was not updated for the final plan.

Finding #1: The documentation for the 2019 Magpie Contingency Plan and the 2021 Missinaibi Forest Management Plan did not meet the Forest Management Planning Manual requirements for First Nation and Métis consultation as follows:

- a) The summaries of First Nation and Métis consultation for the 2019 Magpie Contingency Plan and 2021 Missinaibi Forest Management Plan as provided do not include sufficient documentation to assess the extent of engagement or nature of any concerns identified, or in some cases the Ministry's responses.**
- b) The Report on the Protection of Identified First Nation and Métis Values was not updated for the 2021 FMP.**

3.3 PUBLIC CONSULTATION, AND FIRST NATIONS AND MÉTIS COMMUNITY INVOLVEMENT AND CONSULTATION

The public consultation requirements for the 2019 Magpie Contingency Plan and the 2021-2031 Missinaibi FMP as laid out in the Forest Management Planning Manual were achieved. The Covid-19 pandemic limited the option to have in-person meetings, but MNR District staff and the SFL holder did their best to ensure the requirements were addressed and that all required information about the 2021 FMP was disseminated to interested stakeholders. However, some documentation from the planning process could not be located by the MNR.

Comments on the 2021 FMP were largely from tourism operators, whose concerns were addressed through AOC prescriptions and other measures and with whom discussions and input on operational plans are ongoing. Two issue resolution requests related to concerns about herbicide use on the forest were considered and responded to appropriately, citing efforts and targets to reduce the use of herbicides on the Missinaibi Forest. These include the use of GreenFirst's efforts to reduce herbicides, which includes a "*Judicious Use of Herbicides*" decision tree approach to guide the net-down of herbicide tending areas.

3.3.1 Local Citizens Committee

The audit period encompasses planning and operations on both the former (Martel and Magpie) as well as the amalgamated Missinaibi Forest. Two LCCs (the Wawa Area and Martel LCCs) functioned separately to oversee implementation of the Martel 2011 FMP, as well as the development and implementation of the Magpie 2019-2021 CP. The LCCs were amalgamated in 2022 to form the Missinaibi LCC, whose activities are coordinated by Chapleau/Wawa MNR District work centres. At the time, concerns were raised by the Committees about the large geography and different local interests on the amalgamated Forest. Despite this, the amalgamated Committee is achieving its mandate to provide advice to the Chapleau District Manager on the implementation of the 2021-2031 Missinaibi FMP as outlined in the current Terms of Reference (TOR).

The 2017 Martel IFA included the following findings:

- a) “More effort and a wider range of approaches are required on the part of Chapleau District MNR to support the growth and retention of a diverse LCC.
- b) The Chapleau District MNR has not provided sufficient opportunities to address the LCC’s broader interests in forestry and forest management beyond planning and plan implementation.”

The action plan to address this finding was vague and outlined the following steps to be taken:

“The LCC Terms of Reference will be reviewed to ensure proper or appropriate membership and work to recruit where necessary to support growth and diversification of the committee as per the Forest Management Planning Manual (FMPM) Part A-Section 1.1.3- Line 6,7 Page A-15.”

To address part b) of the 2017 audit finding, Chapleau/Wawa District MNR introduced more topics and speakers of interest to the LCC. District staff is doing a good job in supporting the functioning of the Committee. However, District MNR could not provide evidence to verify that part a) of the finding was addressed.

The recruitment approach by the District appears to rely on LCC members and on the minimum required notices at the start of planning (Section 3.3, 2020 Forest Management Planning Manual). The 2017 finding remains relevant even though some new members have joined. A review of the LCC minutes for the audit period suggests that attendance at meetings was inconsistent and that membership and satisfaction (self-reported) with the functioning of the Committee continue to fluctuate.

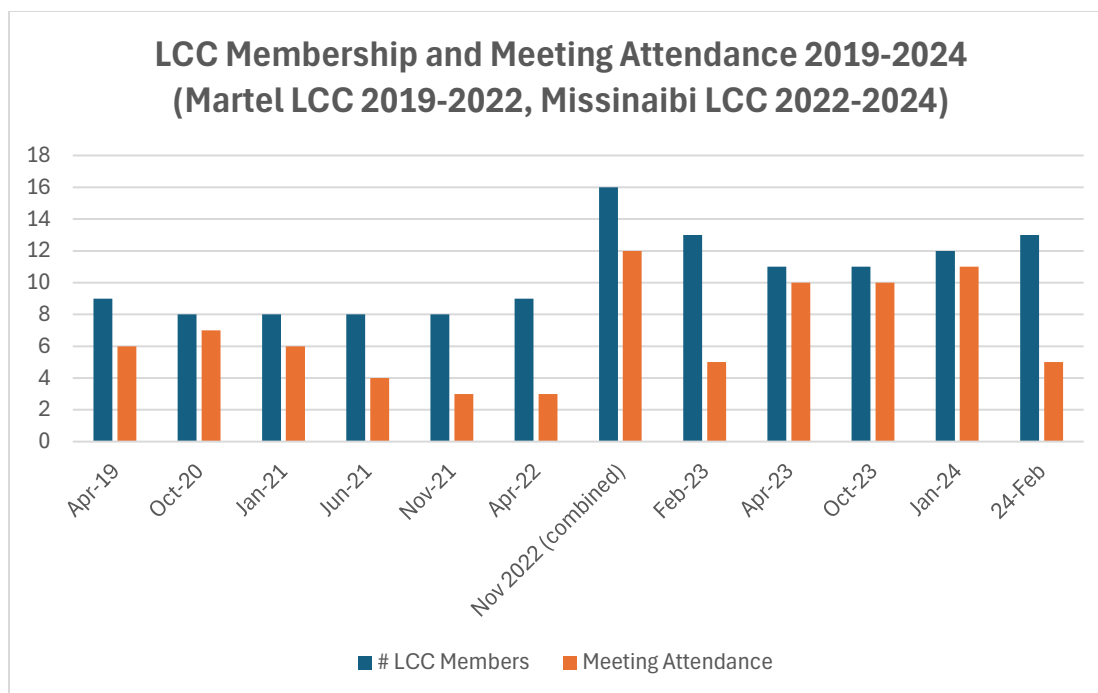


Figure 2. Martel/combined Missinaibi LCC membership and meeting attendance 2019-2023.

The following finding is carried forward from the 2017 Martel Forest IFA. It reinforces the value and importance of having diverse, local representation to participate in forest management planning and operations on the Missinaibi Forest. It also highlights the ongoing commitment and work by MNR District to achieve this.

Finding #2: Chapleau/Wawa District Ministry of Natural Resources could not provide evidence of efforts to implement a wider range of approaches to support the growth and retention of a diverse Local Citizens Committee. This finding is carried forward from the 2017 Martel Forest Independent Forest Audit.

3.3.2 First Nations and Métis Community Involvement and Consultation

In the context of the audit, working relationships between participating First Nations, MNR and GreenFirst appear generally respectful and productive. First Nations were invited to join, and several participated on the FMP Planning Team. There was an Indigenous Task Team (ITT) that held several meetings over the course of planning. A Customized Consultation Approach (CCA) was requested by several communities (Missinabie Cree, Chapleau Cree, and Brunswick House First Nations), with support provided by Wahkohtowin Development GP Inc.³ The CCA was not completed in time to implement for the development of the 2021 FMP. Information provided by an audit participant about the effectiveness of subsequent implementation of the CCA⁴ over the audit term suggests that there was agreement on some improvements in relationships and communications. However, it was also observed that administration of the CCA is burdensome,

³ A social enterprise comprised of a collaboration between the three First Nations

⁴ Based on a 2024 review of the CCA that had input from 30 participants, including First Nations, Wahkohtowin, MNR and forestry industry representatives.

that discussions focus mainly on forest operations and that decision-making remains rooted in the MNR's legislative and regulatory framework.

Concerns raised by local communities around herbicide use are also an ongoing issue. There appear to be direct and open channels of communications with the GreenFirst staff on operational issues of concern (e.g. cultural values, herbicides) and ongoing discussion to safeguard identified values at the planning and operational level. This includes an Herbicides Alternative Program led by MNR, as well as targets for reduction in use over time by the SFL. Based on data provided by the company, GreenFirst achieved a 60% reduction in the use of herbicide (active ingredient) on the Chapleau Game Preserve between 2011-2021.

Best Practice #1: Local First Nations, the MNR and GreenFirst are working collaboratively and in good faith to identify and implement alternatives to herbicide use on the Missinaibi Forest.

Despite these efforts, the use of any chemical tending continues to be a significant concern. The elimination of herbicides is currently constrained by cost and by the efficacy of alternative tending treatments for meeting conifer renewal objectives at a management unit scale. Discussion to address these concerns are ongoing.

Available information suggests that participation in FMP implementation is increasing as Lands and Resources capacity within communities grows. First Nation and Métis consultation on amendments is currently done based on recommendations of the District Resource Liaison Specialists in discussion with the MNR Forester, with final decision making by the District Manager. According to MNR, in most cases, some form of consultation is conducted for both FMP amendments and revisions to the AWS, regardless of the categorization and based on potential risk to Indigenous values. However, feedback received from the First Nations as part of the IFA indicated that regular notification of plan amendments or an agreed-upon process of engagement around plan amendments is of interest.

3.4 PLAN ASSESSMENT AND IMPLEMENTATION

3.4.1 Harvest

A representative sample of harvest area was assessed during the field audit from both the ground and the air. Harvest levels have been below that forecast by the FMPs for the audit period. This is more pronounced on the former Magpie portion of the Missinaibi due to the economic climate experienced during the early part of the audit period. The harvest levels over the past several years have increased and overall, utilization was not noted as an issue in the operations seen by the audit team.

Two different harvesting systems are regularly employed based on both mill requirements and available contractor capacity. A traditional harvesting system is utilized where full-tree logs are brought roadside and processed into product as either treelength or fixed length logs. The application of this system, particularly the treelength product, has been decreasing since the start of the audit term. A cut-to-length (CTL) system - where logs are processed at the stump and brought roadside in product form - is also used and is becoming a more common harvesting system on the Forest.

Good utilization was observed for all merchantable species including black and white spruce, jack pine, balsam fir and veneer-grade aspen. No excessive volumes were left standing or stranded as missed bundles in cutovers, or as unnecessary waste amongst roadside slash. The main consumers of the spruce-pine-fir on the Missinaibi Forest are GreenFirst, Hornepayne Lumber and White River Forest Products. Veneer quality aspen is consumed by Levesque Lumber Co. Ltd. (Columbia Forest Products Ltd.) in Hearst. With this as the only regular but limited destination for hardwood species, the current FMP contains a strategy consistent with the *Northeast Region Creating Forest Operations Opportunities in Low Market Conditions Strategy (2020)*. Veneer harvest areas and operations conducted in mixedwood conditions were found to be consistent with the requirements and intent of the FMP strategy found in supplemental documentation section 6.1.17 *Creating Forest Operations Opportunities in Low Market Conditions Strategy*.

Harvest operations implemented were consistent with the approved FMP and associated Annual Work Schedules (AWS). During the field assessment, no issues or contraventions were identified and Area of Concern (AOC) boundaries were appropriately mapped and implemented. Harvest operations were effective in protecting known values on the forest. The use of 'ribbon-less' boundaries (e.g., digitally mapped boundaries) is being used on internal boundaries only, with external boundaries around AOC laid out with flagging tape. Residual forest requirements, including the retention of wildlife trees in clearcut harvest areas, were met. There were no areas of rutting or other site disturbance observed during the field audit.

Table 3. Planned annualized harvest vs actual annualized harvest in the Forest by area and volume for the period April 1, 2016 to March 31, 2023 (no data available for April 1, 2023 - March 31, 2024).

Sources: 2020 Magpie AR Table 7 and 8, 2020 Martel AR Table 7 and Table 8, 2021 Martel-Magpie FMP Table

Harvest by Area and Volume	Magpie April 1, 2016-March 31, 2021	Martel April 1, 2016 - March 31, 2021	Missinaibi April 1, 2021 - March 31, 2023
Planned Harvest Area (ha)	13,030	46,545	22, 801
Actual Harvest Area (ha)	5,018	19,500	7,498
% of Actual to Planned Harvest Area	38%	41.9%	33%
Planned Harvest Volume (All Species in ha)	1,753,250	5,175,425	2,266,377
Actual Harvest Volume (All Species in ha)	475,000	2,507,050	1,029,203
% of Actual to Planned Harvest Volume	27%	48.4%	45.4%

3.4.2 Debris Management

A portion of the slash/harvesting debris on the forest is being managed either via the harvesting system employed (e.g., CTL harvest where slash is left at the stump in the cutover) or via post-harvest treatment, which is most often the piling of slash at roadside. Objective #16 in the 2021-2031 FMP was to develop and implement a strategy to minimize the loss of productive area, consistent with the direction provided in the Stand and Site Guide (<4% of area lost to roads, landings and slash, combined). The FMP does not contain clear quantitative targets for slash management but does refer to focusing these activities on areas where artificial regeneration is otherwise planned.

During the field audit, significant areas were observed on which roadside slash had not been managed in any manner. There were also areas observed where roadside slash had been piled, but in a manner which did not expose enough mineral soil to allow for successful planting or the natural regeneration of trees to occur.

The 2021 FMP describes the methodology by which the current estimate and target for area lost to roadside debris (as well as other productive land loss) was determined. The calculation was based on a randomly selected but smaller subset of a large depletion area on the former Martel Forest from 2007 to 2017 and was completed using geo-spatial measurements. The measurements on these select depleted areas built the assumptions that were then applied to the broader depletion areas as well as forecast harvest areas in the FMP. It was unclear how the assumptions were applied to productive land loss which is not directly associated with or contained within harvest depletions.

The issue of debris management was identified as a finding in the previous IFA and has again been identified as an area of concern. The levels of debris/slash management which were observed across the many sites selected for the field audit, combined with significant road construction programs may result in a loss of productive land exceeding the 4% that was used to model the current FMP.

Finding #3: The current level of slash management and road construction observed during the field audit does not appear to align with modelled targets related to the loss of productive land.

3.4.3 Access

The audit team assessed a sample of access road construction and maintenance activities including water crossing installations and 21 forestry aggregate pits (FAPs). All of the FAPs viewed were in conformance with FMPM requirements and compliance standards. Proper stabilization via sloping, establishment of setbacks and other safety considerations were consistently implemented. Where possible, organic materials were reapplied and/or tree seedlings were planted as part of the rehabilitation efforts.



Figure 3. Rehabilitated forestry aggregate pit.

The road construction activities were completed as per the FMP requirements and were within the road corridors or operational road boundaries. An item of note is the proposed number of branch roads to be constructed in the 2021-2031 Missinaibi FMP, which appears to be very high in comparison to the achieved level of construction that has occurred in the past. If implemented as planned, these roads may also contribute to the loss of productive forest area, as noted in **Finding #3 (The current level of slash management and road construction observed during the field audit does not appear to align with modelled targets related to the loss of productive land.)**

The audit team inspected 19 water crossings during the field audit. Crossing installation was generally very good, however, some discrepancies from the requirements of the water crossing standards/protocol were observed. Three culverts had significant denting likely caused by the use of coarse fill containing large rocks during installation. These dents are not currently impeding fish habitat. They may, however, cause the culvert to fail prematurely. Three culverts were encountered in a 'perched' position (e.g., not properly or sufficiently embedded in the stream bed). The provincial water crossing standards, as well as the FMP, require culverts to be embedded at a depth sufficient to ensure unimpeded fish passage.

Finding #4: Not all water crossings were installed consistent with the 2020 Ministry of Natural Resources/Fisheries and Oceans Canada Protocol for the Review and Approval of Forestry Water Crossings.

Finally, while erosion control and armoring of the installation sites to prevent aggregate material, siltation and other debris from entering the watercourses were generally well done, the audit team observed at least two instances where road maintenance activities (e.g., grading) has pushed enough road surface material onto the rip-rap to cover it almost entirely. This negates the effectiveness of the rip-rap as an erosion control barrier and allows, in these select instances, for sediment to enter the water course during rain and runoff events.

3.4.4 Renewal

The Missinaibi Forest has an excellent renewal program that is well-planned, implemented and properly documented. The artificial and natural regeneration areas observed throughout the audit field tour from both the ground and air are healthy and harvest areas are renewing as planned. Site preparation and tending treatments are effective, renewal treatments are keeping pace with harvest operations, as are Free-to-Grow assessments. With the low harvest area over the audit term, the planned silviculture level was not met. Since the silviculture level (i.e., area regenerated) is directly tied to harvest area, this is expected.

The renewal results on the Missinaibi Forest are exceptional overall. The level of successful regeneration observed during the field audit demonstrated that species selection, renewal intensity and the level of tending was well-suited for each site. The renewal activities were consistent with the locations in the approved FMP and AWSs. Activities followed the Forest Operations Prescriptions (FOPs) and were consistent with the Silviculture Ground Rules (SGR) in the approved plans.



Figure 4. Successful conifer renewal.

Across Ontario, there has been increasing public pressure to reduce or eliminate herbicide use as a forest renewal tool. Two issue resolution requests about the use of herbicide were addressed in the 2021-2031 FMP planning process. As a certified forest, reduction in the use of herbicides on the Missinaibi Forest is a key requirement within Principle 6.0 Environmental

Values and Impacts of the FSC® National Forest Stewardship Standard of Canada. The FMP planning team also recognized the concerns of First Nations, Métis and other stakeholders with respect to herbicide use.

During site visits, the auditors observed successful herbicide treatments being applied where needed. The auditors also saw examples of attempts to reduce the level of active ingredient of herbicide on different sites in efforts to find the lowest level possible to achieve the desired result. GreenFirst has reduced herbicide use by 60% (active ingredient) within the Crown Game Preserve portion of the Missinaibi Forest (i.e., former Martel Forest). Efforts to find the appropriate balance between herbicide reduction and successful forest renewal was generally achieved. Reducing herbicide while meeting forest renewal objectives remains a challenge, primarily due to the prohibitive cost and efficacy of applying alternative tending treatments at a management unit scale.

Table 4. Annualized planned vs annualized (actual) regeneration on the Missinaibi Forest (April 1, 2016 to March 31, 2023)

Forest	Natural Planned (ha)	Natural Actual (ha)	Planting Planned (ha)	Planting Actual (ha)	Seeding Planned (ha)	Seeding Actual (ha)
April 1, 2016 – March 31, 2021 (Magpie)	1,224	314	916	207	52	0
April 1, 2017 – March 31, 2021 (Martel)	5,616	2,708	3,475	1,189	276	68
April 1, 2021 - March 31, 2023 (Missinaibi)	7,231	3,965	3,722	1,752	39	0
Total (ha)	14,071	6,987	8,113	3,148	367	68

Table 5. Annualized planned vs actual site preparation on the Missinaibi Forest

Forest Term	Mechanical Planned (ha)	Mechanical Actual (ha)	Chemical Planned (ha)	Chemical Actual (ha)
April 1, 2016 – March 31, 2021 (Magpie)	674	194	171	133
April 1, 2017 – March 31, 2021 (Martel)	3,017	742	498	81
April 1, 2021 - March 31, 2023 (Missinaibi)	2,848	1,279	56	0
Total (ha)	6,539	2,215	725	214

Table 6. Annualized planned vs actual tending on the Missinaibi Forest.

Forest	Aerial tending (chemical)	Aerial tending (chemical)
Term	Planned (ha)	Actual (ha)
April 1, 2016 – March 31, 2021 (Magpie)	272	6
April 1, 2017 – March 31, 2021 (Martel)509	3,726	1,476
April 1, 2021 - March 31, 2023 (Missinaibi)	3,376	2,121
Total (ha)	7,374	3,603

Sources: 2021-31 Martel-Magie Forest FMP Table 17, Magpie 2020 AR Table 9, Martel 2020 AR Table 9.

The following observations were made about the processes for developing and amending Silvicultural Ground Rules (SGR). Although they do not represent a non-compliance, they speak to inefficiencies in some aspects of planning and plan implementation.

The field audit included sites where changes were made to a Silviculture Ground Rule (SGR). Where an assigned SGR was deemed to require a modification based on field conditions encountered, the appropriate SGR change was documented in the applicable AR. During the field audit 44 SGR changes were viewed and verified. Following these changes from initial harvest to the current condition proved challenging both for the audit team as well as the SFL/MNR representatives in the field, even when examining the approved annual report information in its required form.

The main function of the SGR change layer is to track the applied silvicultural treatment package and to allow for a comparison between this application and the resulting forest condition at the FTG stage. The result of this comparison is reported in the Year 5 and final year ARs and used to determine the levels of regeneration and silviculture success on the forest. SGR changes are complicated to summarize and report and measure success only against the most recent change. They can also result in the creation of management slivers whereby SGR changes are reported according to original stand boundaries, which do not often form the final stand boundaries that applied silviculture treatments follow.

While this process provides a feedback loop for forest managers indicating the levels of success that applied silvicultural treatment packages are having on the landscape, it lacks an effective linkage back to the default applied SGRs. Without this linkage, the SGR changes may not effectively inform improvements in the development of future FMP post-harvest transition rules. The SFL, however, is following the required process as laid out by the FMPM and FIM.

3.5 SYSTEM SUPPORT

The Missinaibi Forest has been certified under the Forest Stewardship Council® (FSC) National Forest Stewardship Standard of Canada since January 2024, with the Martel Forest FSC certification extending back to 2006. For certified forests, the system support principle is optional for the SFL under the terms of the IFAPP. The auditors found that the SFL staff were knowledgeable and maintained a good system of forest management records.

3.6 MONITORING

3.6.1 Access

Roads and water crossings are inspected and reported through the Forest Operations Information Program (FOIP) which is used by both the SFL and MNR. An annual inspection program by the SFL is conducted to ensure roads and water crossings are maintained and to identify where emergency repairs are necessary. Information is also gathered from the general public who report concerns with roads and access.

There were a number of field audit sites selected to assess road construction that were not accessible by truck, even though the (now inactive) roads are still in the SFL's database and shown on maps as existing roads. The company is attempting to keep the roads layer updated, however, some access to previously harvested areas is becoming restricted due to the deterioration or vegetative overgrowth of the roads.

Roads travelled during the field audit were found to be in a safe and functional condition. With the occasional over-grading exception identified in Finding 4, the road maintenance program is functioning effectively. Access management strategies are employed effectively and where required to protect other resource-based values or interests, access was removed post-operations.



Figure 5. Access removal via berming to ensure protection of other resource-based values.

3.6.2 Renewal

The MFMI and MNR District management unit renewal assessment program was reviewed to determine if it is comprehensive and being used to provide the required silviculture effectiveness monitoring information. The programs were found to be sufficient and effective.

MFMI conducts assessments to determine the status of the forest, effectiveness of the silvicultural treatments, stocking levels, and the need for further treatment if the regeneration standards (indicated in Table FMP-4) for a harvested area are not met.

There are three different surveys completed during the initial 20 years of a regenerating stand, including: stocking and survival surveys during years one to four; assessment of regeneration success to support updates to the FRI in Year 10 after harvest; and, assessment of performance in Year 20 (a requirement from the 2020 FMPM but removed in the 2024 version of the FMPM)

The program includes harvest area from the 2006-2011 and 2011-2021 FMPs for the Martel Forest that is not yet free-to-grow (FTG, describing area that is considered successfully regenerated), representing 1,934 hectares and 23,593 hectares respectively. It also includes area from the 2009-2019 FMP for the Magpie Forest that is not yet FTG (2,521 hectares), based on harvest areas that have been regenerated up to the 2017 season. Areas to be assessed were renewed using the forest unit descriptions and SGRs described in the 2011 FMP for the Martel Forest and the 2009 FMP for the Magpie Forest.

Reporting on the 'assessment of regeneration success' is done by MFMI, with verification through Regeneration Assessment Program (RAP) surveys completed by the MNR. The MNR annual assessment programs focus on assessing and verifying areas which have recently been FTG by the SFL. During this process 10% of the area assessed by MFMI is verified (Figure 6). The MNR conducted required Silvicultural Effectiveness Monitoring (SEM) surveys (2016/2017 to 2021) and RAP assessments (2021 to 2024) on an annual basis. Annual targets to assess 10% of FTG areas are generally being met. The MNR District provides the results of annual renewal monitoring programs to MFMI.



Figure 6. Example of harvest areas successfully meeting free-to-grow (forest renewal) standards.

3.6.3 District Compliance Planning and Associated Monitoring

District Annual Compliance Operations Plans (ACOP) were prepared and in place each year as required. Plans were developed using a risk-based approach and contain targets for forestry and aggregates as well as fish/wildlife and lands aspects. District compliance reporting targets for forestry were generally met through the audit period with some discrepancies attributable to COVID-19 restrictions on field work by MNR staff.

A shortage of trained MNR staff to implement the compliance program was identified as a challenge in the earlier years of audit term but has subsequently improved. It is evident from the number of reports and the detail provided within them that District staff have given compliance monitoring and reporting appropriate attention (see combined compliance summary, Table 7). It was also evident during the field audit that the District maintains a cooperative compliance relationship with SFL staff and that communications between the organizations are respectful and effective.

3.6.4 SFL Holder Compliance Planning and Monitoring

A 10-year strategic compliance plan is in place for the 2021 Missinaibi FMP and was also in place for the 2009 Magpie and 2011 Martel FMPs, as per the requirements of the FMPM and Forest Compliance Handbook. Annual compliance monitoring plans were also included in each approved AWS

The current 10-year strategic compliance plan has six broad objectives. These objectives and highlights of progress are as follows:

1. Sustainable forest management and resource protection
2. Continuous improvement
3. Maximizing efficiency of compliance activities
4. Increasing compliance with legislation
5. Addressing historical compliance problems
6. Human resources and training

Progress towards these objectives is being made. MFMI completed 408 compliance reports during the audit period, covering harvest, access, renewal and maintenance activities (see combined compliance summary, Table 7).

MFMI has trained compliance staff to meet objectives and annual compliance targets. The overall compliance record is excellent, with only six identified non-compliances during the audit period. This represents an overall record exceeding 99% compliance. The few non-compliances that were identified in reports did not represent systemic issues and actions were taken to minimize the chances of reoccurrence. It was evident during the field audit that there is a cooperative compliance relationship between MNR and SFL staff and that productive dialogue is ongoing.

Table 7. Compliance reporting April 1, 2016 (Magpie) April 1, 2017 (Martel) to March 31, 2023*.

Forest Operations Inspected	SFL reports "In Compliance"	SFL reports "Not In Compliance"	Total**	MNR reports "In Compliance"	MNR reports "Not In Compliance"	Total**
Access	192	0	197	72	1	77
Harvest	186	2	191	105	3	114
Renewal	17	0	17	2	0	2
Maintenance	2	0	3	0	0	0
TOTAL:	397	2	408	179	4	193

***Total includes reports which may be pending approval or reports with operational issues which are in process of being corrected.*

3.7 ACHIEVEMENT OF MANAGEMENT OBJECTIVES AND FOREST SUSTAINABILITY

During the audit period, the Magpie 2009-2021 and the Martel 2011-2021 FMPs were completed and the audit team's assessment of objectives achievement for the plans are provided in Appendix #2. The Magpie FMP had four objectives and 32 indicators. For several reasons, three of these indicators could not be evaluated as follows: a) there was incompatibility between the 2009 FMP inventory plan start values and the new FRI inventory, and b) there was FMPM direction that was not carried forward into the new FMP (e.g., former Natural Disturbance Pattern Emulation Guidelines or NDPEG). Finally, nine indicators were determined at Long Term Management Direction or draft plan stage and not reassessed.

The Martel FMP had six objectives and 29 indicators. Of these, ten indicators were assessed during the Year 10 annual report. The remaining 19 indicators were assessed at different times during FMP production (LTMD, draft or final plan) and not required to be reassessed at year 10.

The audit team evaluated the achievement of the 2021-2031 Missinaibi FMP objectives and indicators that could be measured at the time of the audit, given the early stage of plan implementation (e.g., year three of ten). Objectives and indicators that are measured at Year Five and in the final-year Annual Report could not be assessed at the time of the audit. The summary of objectives assessed during plan preparation are listed below.

2021 Missinaibi Forest Management Plan Objectives Assessed During Plan Preparation (seven objectives and 27 indicators):

- 1) Develop a forest with an age class structure, composition and abundance that more closely resembles the expected results produced by wildfire (nine indicators)
- 2) Develop landscape patterns that more closely resembles the expected size composition and age produced by wildfire (three indicators)

- 3) Forest conditions that are similar to the conditions moose prefer and would encounter in a natural forest ecosystem, and consider the provision of moose emphasis areas (four indicators)
- 4) Wood supply (five indicators)
- 5) Involvement in the FMP process (four indicators)
- 6) Investigate and implement opportunities to reduce the application of herbicides (one indicator)
- 7) Productive forest area lost by forest management activities (one indicator)

Overall, the documentation in the Forest Management Plan demonstrated that most objectives and indicators have been maintained within desired levels and that there is movement toward objective achievement. The assessments made by the planning team are consistent with assessments made by the audit team as part of the 2024 IFA. For management objectives that are not achieving the desired levels, the appropriate rationale is also documented in the FMP text (see Appendix 2: Management Objectives Table).

3.8 CONTRACTUAL OBLIGATIONS

The evidence collected and reviewed by the audit team showed that MFMI is generally meeting its contractual obligations. The Forest Renewal Trust (FRT) account balances are being maintained as required. A third-party “Specified Procedures Audit” was conducted to ensure that costs for forest renewal, billed to the Missinaibi Forest Renewal Trust Account, are in conformance with the MNR guidelines (Forest Renewal Trust Eligible Silviculture Work – April 2017 and Forest Renewal Trust Claims Process for Forest Managers 2022-2023). The 2022-2023 fiscal year was chosen for this audit and no errors or items of concern were identified by the report provided.

MFMI has completed required surveys and reports data consistent with the requirements of the Forest Information Manual (FIM). Wood supply commitments are being met to the satisfaction of the consuming facilities. Provincial Roads Funding dollars are being managed appropriately and allocated among the licensees in a manner that is satisfactory to all parties. Appendix 3 (Compliance with Contractual Obligations) provides a more detailed assessment of each obligation.

However, the audit team noted that under “*Audit Criterion 8.1.9 - Action plan and reporting on progress towards the completion of actions*”, the status reports from the past 2016 Martel and 2017 Magpie IFAs were lacking quantitative information to describe the effectiveness of actions taken to address some previous audit findings (see Appendix 1). For this reason, two of the findings were carried forward in the 2024 Missinabi IFA, leading to Finding #5.

Finding #5: Both the Magpie 2016 and Martel 2017 Independent Forest Audit action plans and status reports were lacking quantitative measures that would allow a conclusive assessment of progress to address some previous Independent Forest Audit findings.

3.9 CONCLUDING STATEMENT

The audit team concludes that apart from the five audit findings noted, the management of the Missinaibi Forest was in compliance with the Forest Management Planning Manual and the *Crown Forest Sustainability Act* during the April 1, 2016 to March 31, 2024 audit term. Forest management planning, operations, monitoring and reporting activities have been effective in contributing to meeting the objectives set out in the applicable forest management plans. Missinaibi Forest Management Inc. is in compliance with the terms and conditions of the Sustainable Forest License No. 550390.

APPENDIX 1. FINDINGS

<p style="text-align: center;">Independent Forest Audit – Record of finding Finding #1</p>
<p>Principle 2: Public consultation, and First Nations and Métis community involvement and consultation</p> <p>Audit Criterion: 2.5.1 First Nations and Métis community involvement and consultation in Forest Management Plans, amendments, contingency plans</p> <p>Procedure(s):</p> <ul style="list-style-type: none"> For Forest Management Plans whether the applicable reports were prepared, delivered to the First Nations and Métis communities at the required times, communities were involved in review and/or production of the reports, the reports reflect the communities and whether they were appropriately used in production of the Forest Management Plan/appropriately reflect the Forest Management Plan.
<p>Background information and summary of evidence:</p> <p><i>Evidence: 2021-2031 Missinaibi Forest Management Plan and Supplementary Documentation, Draft Reports on the Protection of Identified First Nations and Métis Values, Aboriginal Background Information Reports, Summary of First Nations and Métis Consultation, minutes of Indigenous Task Team meetings, interviews with Lands and Resources representatives of Michipicoten First Nation and Chapleau Cree First Nation, written input from the Director of Lands and Resources for Missanabie Cree, discussions with Sustainable Forest Licence and Ministry of Natural Resources representatives.</i></p> <p>As per those interviewed and as reflected in the planning team minutes and summary of consultation, the working relationships on the Forest seem generally positive. First Nations and Métis communities and organizations were invited to and several participated on the Planning Team. The First Nation and Métis Task Team held several meetings over the course of planning and there were 30 participants at a Cross-Cultural Training event that took place in Chapleau.</p> <p>A Customized Consultation Approach was requested by Missanabie Cree First Nation, Chapleau Cree First Nation and Brunswick House First Nation, with support from Wahkowshtowin Development GP Inc. However, it was not completed in time to implement before the approval of the 2021 Missinaibi Forest Management Plan. Information provided by community Lands and Resources staff included a 2024 review of implementation of the approach that involved input from 30 people, including First Nations, MNR, SFL staff and Wahkowshtowin. The review showed agreement on some improvements in relationships and communications. However, it was also observed that administration of the Customized Consultation Approach is burdensome, that discussions focus mainly on forest operations, and that decision-making remains rooted in the MNR’s legislative and regulatory framework, an issue of ongoing concern to the communities involved.</p>

There appear to be fairly direct and open channels of communications with GreenFirst on forest operations (e.g. values, herbicides) and ongoing discussion to protect identified values at the operational level. Herbicides continue to be a significant concern for local communities and were the subject of two Issue Resolution requests in the development of the 2021-2031 Missinaibi FMP. This is a growing issue around the province and efforts have been made by GreenFirst to respond to concerns around herbicide use by reducing the amount of active ingredient in spray programs.

There is a Ministry of Natural Resources-led Herbicides Alternative Program and targets for reduction in herbicide use on the Forest over time. GreenFirst provided evidence that the percent of active ingredient used within the Chapleau Game Preserve has been reduced by 60% between 2011-2021. The audit team observed, based on discussions, interviews and a review of documentation that the parties seem to be collaborating in good faith to address the ongoing concerns around herbicide use on the Forest.

Participation in planning and implementation phases appears good and improving as Lands and Resources capacity grows. Much of the communication on operational issues happens directly between the First Nations/Métis communities and MFMI and is not publicly documented. However, the forest management planning process has requirements to document engagement and the nature of concerns identified, as well as the integration of concerns into the Forest Management Plan.

The documentation of engagement with Indigenous communities on the 2019 Magpie Contingency Plan and 2021 Missinaibi Forest Management Plan by the Ministry of Natural Resources was thorough but process oriented. It did not provide a clear picture of the nature of concerns raised and level of engagement for the purposes of the audit. This is important in cases where there is a low response to audit participation by First Nations and Métis communities. Some observations on the available documentations were as follows:

Magpie 2019 Contingency Plan

- Documentation of First Nation and Métis consultation is general and not consistent with requirement described in Forest Management Planning Manual Section 3.6.4 (Summary of First Nations and Métis Involvement)
- A summary of additional communication efforts with each community was comprised of the same generic text for every community and did not describe specific communication efforts
- A summary of comments or input received from each community, and a summary of planning team responses were generally but not always included in the summary available, it was sometimes not clear if there was any response by Ministry of Natural Resources
- A summary of First Nation and Métis community participation at public information forums was summarized using statements like "participation was good", which does not allow an audit team to assess the extent or effectiveness of engagement efforts

- The required Report on Protection of Values was not finalized.
- Meeting minutes/attendance lists (with one exception) for the meetings with First Nations during the Magpie Contingency Plan could not be provided by Ministry of Natural Resources.

2021 Missinaibi Forest Management Plan

- The summary is process heavy and not informative about the nature of discussions and how any concerns were addressed.
- The required Report on the Protection of Identified First Nation and Métis Values was not updated.

Discussion and Conclusion:

It is difficult to assess through Forest Management Plan documentation provided a) what was discussed at meetings with First Nations and Métis communities, b) the level of participation/engagement and c) how concerns were integrated into the 2019 Magpie Contingency Plan and 2021 Missinaibi Forest Management Plan. The Report on the Protection of Identified First Nation and Métis Values (Wawa and Chapleau District) was not updated for the final plan.

Finding #1: The documentation for the 2019 Magpie Contingency Plan and 2021 Missinaibi Forest Management Plan did not meet the Forest Management Planning Manual requirements for First Nation and Métis consultation as follows:

- a) The summaries of First Nation and Métis consultation for the 2019 Magpie Contingency Plan and 2021 Missinaibi Forest Management Plan as provided do not include sufficient documentation to assess the extent of engagement or nature of any concerns identified, or in some cases the Ministry's responses.
- b) The Report on the Protection of Identified First Nation and Métis Values for the 2021 FMP was not updated.

Best Practice #1: Local First Nations, the MNR and GreenFirst are working collaboratively and in good faith to identify and implement alternatives to herbicide use on the Missinaibi Forest.

<p style="text-align: center;">Independent Forest Audit – Record of Finding Finding #2</p>
<p>Principle 2: Public consultation, and First Nations and Métis community involvement and consultation</p> <p>Audit Criterion: 2.1.2 LCC purpose and activities</p> <p>Procedure(s):</p> <ul style="list-style-type: none"> Review and assess whether the Local Citizens’ Committee met the purposes and conducted its activities in accordance with the applicable Forest Management Planning Manual.
<p>Background information and summary of evidence:</p> <p>Local Citizens’ Committee</p> <p><i>Sources of evidence: Local Citizens’ Committee meeting minutes, Local Citizens’ Committee self-assessment, planning team meeting minutes, interviews with four Local Citizens’ Committee members, Ministry of Natural Resources management forester, amendment documentation, 2016 Magpie and 2017 Martel Independent Forest Audit action and status reports, Forest Management Plan & Supplementary Documentation</i></p> <p>Prior to the amalgamation of the Magpie and Martel Forests, there were two standing Local Citizens’ Committees operating out of the Wawa and Chapleau Districts on the Magpie and Martel Forests respectively. The Wawa Area Local Citizens’ Committee participated in the development of the 2019-2021 Contingency Plan and both Local Citizens’ Committees participated in the development of the 2021-2031 Missinaibi Forest Management Plan and submitted Local Citizens’ Committee reports as required. The two Committees were amalgamated in 2022 to form the Missinaibi Local Citizens’ Committee. The Committee is currently coordinated out of the Chapleau/Wawa District Office and is appropriately supported by Ministry of Natural Resources staff, with some long-standing members serving for many years.</p> <p>There is a reasonable representation of interests given the challenges associated with finding members. However, the 2017 Martel Independent Forest Audit included a finding that the Ministry of Natural Resources should make more efforts to expand and diversify membership.</p> <p>Local Citizens’ Committee meeting minutes that address membership and recruiting documented requests to the Local Citizens’ Committee to reach out in the community to identify potential new members (Martel Local Citizens’ Committee, Nov 2017, Feb 2020, May 2022). Based on a review of available evidence, however, it is unclear what efforts were made by Ministry of Natural Resources Chapleau/Wawa District to recruit new members and/or facilitate greater participation in meetings. The only documentation available to demonstrate MNR’s efforts to recruit consisted of two email invitations to the Local Citizens’ Committee sent to First Nations at the start of planning for the 2021 Forest Management Plan. This was provided by MNR Chapleau District to the audit team on request.</p>

The current Missinaibi Local Citizens' Committee continues to operate out of separate locations (Wawa and Chapleau) as one committee advising the Chapleau District Manager on forest management issues. Meetings are hybrid (e.g., virtual and in-person), with few people attending in person. Some members noted that the virtual format wasn't effective for them and that the large geography of the Forest was a challenge for addressing local interests. A Local Citizens' Committee survey reflected decreasing satisfaction of Local Citizens' Committee members from 2014-2021 (2021 Local Citizens' Committee Member Survey). No Local Citizens' Committee members with a history on the forest expressed interest in participating in the 2024 Independent Forest Audit, nor responded to several emails from the audit team though two recently appointed members were on the audit field audit tour in other professional capacities. Phone calls were made to contact individual Local Citizens' Committee members for input. Participating in audits is identified as part of the mandate of the LCC.

Discussions about specific road access issues that are outside the scope of the Local Citizens' Committee mandate (as described in the Missinaibi Local Citizens' Committee Terms of Reference) continue to be raised at Committee meetings. While efforts have been made by Chapleau District Ministry of Natural Resources to address these concerns outside the Local Citizens' Committee forum, the subject continues to be a source of frustration for some Local Citizens' Committee members. While LCCs are established to contribute recommendations and advice to MNR, final decision-making authority on forestry and land use matters ultimately rests with the District MNR. The audit team observed that this issue seems to be affecting the dynamics between the Committee and MNR. Having a larger and more diverse Local Citizens' Committee can help bring different perspectives to the table and boost participation by reducing the considerable volunteer investment required by individual members. This highlights the importance of ongoing efforts to recruit and retain LCC members who bring valuable local knowledge to decision-making processes.

Discussion and Conclusion:

While the Local Citizens' Committee(s) generally fulfilled their mandate during Forest Management Plan and Contingency planning and implementation, there are ongoing frustrations from some members around road use issues that are not related to implementation of the 2021 Forest Management Plan. Despite District MNR efforts to address these concerns, the outcomes have not been satisfactory to all parties and appear to affect the dynamics of the Committee. As an advisory Committee, the LCC can offer advice and recommendation to the District Manager but final decision-making rests with the District. In-person attendance at meetings is low. Membership and participation in meetings fluctuated over the audit period and satisfaction (as per Local Citizens' Committee 2021 self-assessment) declined. None of the Local Citizens' Committee members responded to invitations to participate in the 2024 Independent Forest Audit, though some responded to individual requests for interviews.

Finding #2: Chapleau/Wawa District Ministry of Natural Resources could not provide evidence of efforts to implement a wider range of approaches to support the growth and retention of a diverse Local Citizens Committee. This finding is carried forward from the 2017 Martel Forest Independent Forest Audit.

Independent Forest Audit – Record of finding
Finding #3

Principle 3: Forest Management Planning

Audit Criterion 3.4.2 Support for Base Model Inventory and Base Model

Procedure(s):

- Confirm checkpoint by assessing and reporting on whether the Forest Management Plan modelling assumptions used are reasonable and based on the best available information. Examine: all modelling assumptions including land base, growth and yield, expected rates of stand replacing natural disturbances (e.g., fire and insects), operability, forest succession, unplanned losses, thinning, loss to roads and landings, silviculture, revenue, biological limits, wildlife.

Background information and summary of evidence:

Summary of Evidence: Forest Management Plan maps, Forest Management Plan tables, Supplementary Documentation, Annual Reports, Previous Independent Forest Audit reports, Forest Management Plan modelling inputs, Independent Forest Audit status reports, field tour results, Sustainable Forest Licence slash management tracking

The 2021 Forest Management Plan model inputs for loss of productive land was determined to be 4%, with 1.9% being lost to roads and 2.1% assumed to be lost to landings and slash. Concerns regarding loss of productive land and slash management on the forest have been referenced in the previous audit reports for the former Magpie and Martel forests. The previous Independent Forest Audit report on the Martel had a finding related to the amount of productive area lost to roadside slash and unused wood. The Magpie Independent Forest Audit had a recommendation to ensure all slash management activities be implemented on backlog areas recently declared naturally regenerating. To determine if the action plan remedies were met, the amount of slash treatments completed was part of the audit.

A portion of the slash/harvesting debris on the forest is being managed either via the harvesting system employed (ie. cut-to-length harvest whereby slash is left at the stump in the cutover) or via post-harvest treatment which is most often the piling of slash at roadside. Objective #16 in the 2021-2031 Forest Management Plan is to develop and implement a strategy to minimize the loss of productive area, consistent with the direction provided in the Stand and Site Guide (<4% of area lost to roads, landings and slash, combined). The Forest Management Plan does not contain specific quantitative targets for slash management but does refer to focusing planned slash management activities on areas where artificial regeneration is otherwise planned.

During the field audit, significant areas were observed on which roadside slash had not been managed in any manner. There were also areas observed where roadside slash had been piled, but in a manner which did not expose enough mineral soil to allow for successful planting or the natural regeneration of trees to occur. Based on the areas observed and evidence reviewed, the 2.1% loss of productive land utilized in current FMP modelling for landings and slash could not be confidently supported.

Although the gross cutover areas on which slash management treatments are applied are tracked annually in a spatial file, there is no specific annual monitoring program in place which measures the actual productive area being lost to slash/harvesting debris. The Forest Management Plan only commits that assessments will be summarized in the year 5 and final year annual reports making it difficult to determine ongoing status or to make necessary strategic or operational adjustments.

Loss of productive land also includes roads. A significant road construction program in support of forest operations was observed during the field audit. This included many short-term tertiary access roads but also many longer-term branch roads which are planned for use beyond the current FMP term. The level of road construction observed, although within approved parameters of the FMP, may contribute to an additional loss of productive land exceeding the 1.9% modelled for roads particularly since there was little evidence of an active road decommissioning program. Active road decommissioning is often necessary to ensure or at least accelerate the reclamation of forestry access roads back to productive growing areas.



Unmanaged roadside slash (left). Piled slash still occupying otherwise productive land (right).

Discussion and Conclusion(s):

In the absence of direct quantifiable evidence, the level of planned road construction, particularly branch road construction, and the limited amount of active slash management in many harvest areas, the realized loss of productive land may be greater than that forecast by current modelling.

Finding #3: The current level of slash management and road construction observed during the field audit does not appear to align with modelled targets related to the loss of productive land.

<p align="center">Independent Forest Audit – Record of finding</p> <p align="center">Finding #4</p>
<p>Principle 4: Plan Assessment and Implementation</p> <p>Audit Criterion: 4.7.1 Access</p> <p>Procedure(s):</p> <ul style="list-style-type: none"> • Review and assess in the field the implementation of approved access activities • Determine whether the operations implemented were consistent with locations in the approved Forest Management Plan, the Annual Work Schedule, approved standards or conditions on construction and removal, including the approved water crossings structure, Fisheries Act review, and conditions on crossings of other Areas of Concern, use management (maintenance, access control, any removal and decommissioning provisions)
<p>Background information and summary of evidence:</p> <p><i>Summary of Evidence:</i></p> <p>The audit team assessed 19 water crossings that were installed (or reinstalled) during the audit period. Some of those assessed showed certain inconsistencies with the Ministry of Natural Resources and Fisheries and Oceans Canada protocol for the review and approval of forestry water crossing and the approved water crossing standards it contains.</p> <p>Three culverts were observed with damage (dented and out of round) likely occurring during installation. This damage was not cause for immediate concern as it was not impeding water flow or potential fish passage but could result in premature failure or loss of function in the future.</p> <p>Three culverts were observed in a ‘perched’ position due to the boulder or bedrock base on which they were placed. One culvert was found placed away from the mapped and natural stream channel resulting in a short diversion along the roadside. It appears that it was installed this way to avoid the rocks (and possible perching) encountered at the planned location. Although functioning from the perspective of allowing drainage, the location of the installation was misaligned with the natural channel and is heavily favoured to one side of the no-harvest Area of Concern.</p>



Crossing W-768 sitting in perched position. Crossing W-507 with potential erosion issues caused by road maintenance.

In general, mitigative measures to control long-term erosion was well done at crossing sites. There were however two instances of over-grading observed which spilled loose road material onto the crossing covering much of the existing erosion control. There were also a number of instances of double-ditching found near crossings which has the potential to increase erosion by trapping and focusing the drainage of rainwater and snow melt.

Discussion and Conclusion(s):

While the majority of the crossings visited were well installed and functioning in a safe and environmentally sound manner, some of the culverts assessed did demonstrate certain inconsistencies with approved standards. Where problems were encountered resulting from the presence of boulders and bedrock on installation sites, evidence of thorough planning and preconstruction verification and discussion between the Sustainable Forest Licence and Ministry of Natural Resources biologists was lacking.

Finding #4: Not all water crossings were installed consistent with the Ministry of Natural Resources/Fisheries and Oceans Canada Protocol for the Review and Approval of Forestry Water Crossings, 2020.

<p align="center">Independent Forest Audit – Record of finding</p> <p align="center">Finding #5</p>
<p>Principle 8: Licence and contractual obligations</p> <p>Audit Criterion 8.1.9: Action plan and reporting on progress towards the completion of actions</p> <p>Procedure(s):</p> <ul style="list-style-type: none"> • whether the status report appropriately reflects what actually occurred to address the audit findings; and if any actions were inconsistent with the approved action plan, whether a reasonable explanation has been provided; • the extent to which actual actions were effective in addressing the audit findings;
<p>Background information and summary of evidence:</p> <p><i>Evidence: Independent Forest Audit Action Plans and 2019/2020 Status Reports for Magpie/Martel Forests</i></p> <p>Action plans and status reports from the 2017 Martel Independent Forest Audit were developed. Due to lack of data or documentation, the auditors were unable to determine whether the following recommendations and findings from previous audits were adequately addressed.</p> <p>Martel 2017 Independent Forest Audit Action Plan and Status Report (2020)</p> <ul style="list-style-type: none"> • <i>2017 Finding 1a: More effort and a wider range of approaches are required on the part of Chapleau District Ministry of Natural Resources to support the growth and retention of a diverse Local Citizens Committee.</i> <ul style="list-style-type: none"> ○ Status: Noted in Finding 2 of 2024 Independent Forest Audit that this is an ongoing concern, there is a lack of documentation to describe the Ministry of Natural Resources’ role in Local Citizens’ Committee recruitment and retention. • <i>2017 Finding 3: Available information on the thermal status of many streams was inadequate for sufficient Area of Concern (AOC) planning, leading to many requests to extend the timing window for water crossing installations.</i> <ul style="list-style-type: none"> ○ Status 2020: "In addition to field work to verify specific stream segment occupancy, the Chapleau District Ministry of Natural Resources has been working with other NER Districts to deploy thermal loggers in a variety of streams across the landscape." ○ "Thermal loggers piloted on the Missinaibi Forest in summer 2024." ○ Documents planned staff hours to investigate but does not indicate outcome (e.g., how many streams were mapped to improve AOC planning). • <i>2017 Finding #6 b: b) RYAM is not minimizing the amount of productive area lost to roadside slash and unused wood.</i> <ul style="list-style-type: none"> ○ 2020 Status: "Completed". ○ The 2024 Independent Forest Audit finding notes a lack of quantitative evidence, including no evidence of slash management activities implemented.

Magpie 2016 Independent Forest Audit Action Plan and Status Report

- *Recommendation #11: The forest manager shall ensure that all slash management activities be implemented on backlog areas recently declared naturally regenerating.*
 - Status: Slash management identified as potential ongoing issue in 2024 Independent Forest Audit

Discussion and Conclusion:

While past status reports identify some actions as complete, two issues (Local Citizens' Committee and slash management) continue to be identified as issues in the 2024 Independent Forest Audit. It is challenging to assess the extent or details of what action has been taken based on general descriptions of the response (qualitative, lacks measurable progress). Progress on another past Independent Forest Audit recommendation to e.g., improve data on stream thermal regimes is also difficult to assess.

Finding #5: Both the Magpie 2016 and Martel 2017 Independent Forest Audit action plans and status reports were lacking quantitative measures that would allow a conclusive assessment of progress to address some previous Independent Forest Audit findings.

APPENDIX 2. MANAGEMENT OBJECTIVES TABLE

Table 8. Magpie FMP 2009-2021.

Objective and Indicator	Auditor Assessment	Auditor Comments
Objective 1. Forest Diversity: 1.1 Age Class Structure: To ensure that changes in the abundance of mature and old growth forest are similar to the expected natural condition. 1.1.1. Area by forest type and age 1.1.2. Amount and distribution of old growth forest:	Not Assessed	The actual FMP end levels were not determined for the 2020-2021 Year 10 enhanced Annual report as they are not comparable to plan start values due to the new FRI and the definition changes for seral stages. For this reason, the auditor cannot assess this objective.
Objective 1. Forest Diversity: 1.2 Forest Composition and Abundance: To ensure that within the limits of silvicultural practices changes in the abundance of forest unit areas are similar to the expected natural condition 1.2.1 Area by forest unit (ha)	Achieved	The desired levels and target was $\geq 70\%$ of the natural benchmark (N.B.) by term for all F.U.s, except BW1 which was to be 56%. The results showed the desired level being $\geq 70\%$ of the N.B. by term

Objective and Indicator	Auditor Assessment	Auditor Comments
<p>2.1.9 Percent of forecast volume actually utilized by mill</p> <p>2.1.10 Managed Crown forest available for timber production (ha)</p>	<p>Not Achieved</p> <p>Achieved</p>	<p>The desired level and target was to have no more than 2% of the harvest area lost. The analysis showed a 0.064 percent loss of total production forest lost to new road construction. Due to the low level of harvest and required road construction, the level was less than the 2% target. This objective was achieved.</p>
<p>Objective 2. Social and Economic: 2.2 Remote Tourism and Recreation: To moderate the impacts of forest operations on remote tourism and recreational activities consistent with the Crown Land Use Atlas.</p> <p>2.2.1 Compliance with prescriptions for the protection of resource-based tourism values (% of inspections in compliance)</p> <p>2.2.2 Kilometres of drivable road per square kilometre of Crown forest within 3 km of designated remote tourism lakes.</p>	<p>Achieved</p> <p>Not Achieved</p>	<p>The desired level and target was to have no non-compliances with prescriptions for the protection of resource-based tourism values. This objective was achieved.</p> <p>The desired and target level was to decrease the road density within 3km of remote tourism lakes. The level has increased by 0.068 km/km². This objective was not achieved.</p>

Objective and Indicator	Auditor Assessment	Auditor Comments
<p>Objective 2. Social and Economic: 2.3 Road Based Tourism, Recreation and Commercial Activities: To moderate the impact of forest operations on road-based tourism and recreational activities, mineral exploration and other road based commercial activities consistent with the Crown Land Use Atlas.</p> <p>2.3.1 Kilometres of drivable road per square kilometre of Crown forest excluding area within 3 km of designated tourism lakes.</p> <p>2.3.2 Compliance with prescriptions for the protection of values related to road based tourism, recreation, mineral exploration and commercial activities (% of inspections in compliance)</p>	<p>Achieved</p> <p>Achieved</p>	<p>The desired and target level are to maintain or increase road density. This was met as the road density outside 3km of remote tourism lakes has increased by 0.074 km/km². This objective was achieved.</p> <p>The desired level and target are to have no non-compliances reported. For the 2009-2021 period, no non-compliance was reported for the protection of values related to road-based tourism, recreation, mineral exploration and commercial activities. This objective was achieved.</p>
<p>Objective 2. Social and Economic: 2.4 Healthy Forest Ecosystems: To undertake all</p>		

<p>Objective 2. Social and Economic. 2.6 Cultural, Heritage, and Aboriginal Values: To minimize the impact of forest operations on cultural, heritage, and aboriginal values.</p> <p>2.6.1 Compliance with prescriptions for the protection of cultural, heritage, and aboriginal values. (% of inspections in compliance).</p>	<p>Achieved</p>	<p>The desired level was to be 100% in compliance and the target was to have 0% significant non-compliance and less than 5% moderate and minor non-compliances. There were no instances of 'non-compliance' with prescriptions for the protection of cultural, heritage, and aboriginal values. This objective was achieved.</p>
<p>Objective 3. Forest Cover: 3.1 Featured Species Habitat: To ensure that changes in the abundance of potential preferred habitat for regionally featured species are similar to the expected natural condition.</p> <p>3.1.1 Area of habitat for forest dependent provincially and locally featured species</p>	<p>Partially Achieved</p>	<p>The desired level and target were to be $\geq 70\%$ of the natural benchmark (N.B.) by term. With the low level of forest disturbance upon which this indicator is based, the desirable level and target were not achieved for those species dependant on disturbance (moose [browse], black bear [breeding and summer], Lynx, Red-breasted nuthatch). Those not dependant on disturbance (Marten, Moose [winter], Black-backed woodpecker) did achieve their target level). Overall, this objective was partially achieved.</p>

<p>Objective 3. Forest Cover: 3.1.2 Provision of marten core areas (% of capable area in suitable conditions in core areas)</p> <p>3.2.1 Area of habitat for forest dependent species at risk. Great Grey Owl</p> <p>3.2.2 Compliance with prescriptions for the protection of values associated with species at risk: Bald Eagle</p>	<p>Achieved</p> <p>Achieved</p>	<p>The desired level is to be $\geq 70\%$ of the natural benchmark of 23,170 ha which was achieved at plan end with 79% (29,620 ha).</p> <p>The desired level was 100% compliance and target of 0% significant non-compliance and less than 5% moderate and minor non-compliance. There were no instances of non-compliance with prescriptions for the protection of values associated with species at risk (Bald Eagle). This objective was achieved</p>
<p>Objective 3. Forest Cover: 3.3 Riparian Zones and Water Quality: To ensure the maintenance of riparian zones, water quality and habitat for fisheries resources.</p> <p>3.3.1 Compliance with prescriptions developed for the protection of water quality and fish habitat (% of inspections in compliance)</p>	<p>Achieved</p>	<p>The desired level was 100% compliance and target 0% significant non-compliance and less than 5% moderate and minor non-compliance for the protection of water quality and fish habitat. There was 1 operational issue identified in compliance reports related to water quality and fish habitat but this issue was considered resolved thus there were no non-compliances with</p>

		prescriptions for the protection of water quality and fish habitat. This objective was achieved.
Objective 3. Forest Cover: 3.4 Non-Timber Values: To implement forest operations in a manner that protects non-timber values. 3.4.1 Compliance with prescriptions developed for the protection of natural resource features, land uses or values dependent on forest cover (% of inspections in compliance)	Achieved	The desired level was 100% compliance and target 0% significant non-compliance and less than 5% moderate and minor non-compliance for the protection of natural resource feature, land uses or values dependant on the forest. There were no non-compliance reports for the protection of natural resource feature, land uses or values dependant on the forest. This objective was achieved.
Objective 4. Silviculture: To ensure the successful renewal of harvested stands. 4.1.1 Percent of harvested forest area assessed as free-growing. 4.1.2 Proportion of area harvested and treated by silvicultural intensity in Term 1.	Not Assessed Not Achieved	The actual FMP end levels were not determined as the areas depleted during the plan were not eligible for assessment for Free-to-Grow. For this reason, the auditor cannot assess this objective. The desired level is to be consistent with FMP-21. The target was plus or minus 10% of the desirable level by intensity. The levels were more than the +/- 10% of the desired level. The intensive and basic treatments were higher than the target, which results in extensive treatment level being lower, as more area went to the Ext and Int. This objective was not achieved.

<p>Objective 1. Forest Diversity-habitat for animal life Forest Cover - values dependent on the Crown forest</p> <p>1.9 Ensure that high conservation value forest attributes are identified and given due consideration for their protection on the forest.</p>	Achieved	The desired level and target was compliance with prescriptions for the protection of High Conservation Value Forest (HCVF) (% of inspections in compliance). There were no non-compliances identified with respect to the protection of HCVF. This objective was achieved.
<p>Objective 2: Silviculture</p> <p>2.1 Keep Forest ecosystems productive and healthy.</p>	Achieved	The desired level was 100% of the area assessed declared as free-to-grow and a target of >90% of the area assess declared as free-to-grow. From the total area surveyed, 97.3% was declared free-to-grow. This objective was achieved.
<p>Objective 3: Social and Economic</p> <p>3.1 Ensure the protection of natural resource features, non-timber uses, and other values dependent on forest cover on the land base.</p>	Achieved	The desired level was all inspections in compliance. The target was a maximum of 5% of inspections having a minor non-compliance; zero inspections having a moderate or major non-compliance with respect to the protection of natural resource features, land used or values dependent on forest cover. There were no non-compliance during the period with respect to the protection of natural resource features, land used or values dependent on forest cover. This objective was achieved.

<p>Objective 3: Social and Economic - healthy forest ecosystems</p> <p>3.2 Conduct forestry practices in a manner such that all resource users may gain benefit from the forest. while recognizing that compromises need to be made to ensure the viability of resource-based activities.</p>	Achieved	<p>The desired level was all inspections in compliance. The target was a maximum of 5% of inspections having a minor non-compliance; zero inspections having a moderate or major non-compliance with prescriptions for the protection of resource-based tourism values. There were no non-compliances related to resource-based tourism values. This objective was achieved.</p>
<p>Objective 3: Social and Economic - community well-being</p> <p>3.3 To minimize the impact of forest operations on known cultural heritage values.</p>	Achieved	<p>The desired level was all inspections in compliance. The target was a maximum of 5% of inspections having a minor non-compliance; zero inspections having a moderate or major non-compliance with respect to the protection of known cultural heritage values. There were no non-compliance during the period with respect to the protection of known cultural heritage values due to the extensive work to gather values information. This objective was achieved.</p>
<p>Objective 3: Social and Economic - community well-being</p> <p>3.4 Supply industrial and consumer wood needs while maintaining forest sustainability, and to realize a</p>	Partially Achieved	<p>The desired level was to supply a number of mills with volume with the target to meet or exceed the planned volume by mill. Mills closed and idling occurred therefore analysis was not available for the auditor. Two mills were evaluated, one utilized 69% of planned</p>

predictable, continuous, and consistent flow of roundwood from the Martel Forest.		and the other utilized 47% of planned volume, not meeting the desired level. This objective was partially achieved.
Objective 4: Forest Diversity - habitat for animal life Forest Cover - values dependent on the Crown forest 4.2 Minimize the impacts on water quality and aquatic habitat within areas of harvest, renewal, tending and access operations.	Achieved	The desired level was all inspections in compliance and target was a maximum of 5% of inspections having a minor non-compliance; zero inspections having a moderate or major non-compliance with prescriptions developed for the protection of water quality and fish habitat. There were a few operational issues identified in compliance reports around water crossing installations, however, these were all resolved, resulting in no non-compliances. This objective was achieved.
Objective 6: Social and Economic - healthy forest ecosystems 6.1 To encourage and ensure compliance with legislative and regulatory requirements, which contribute to the sustainable management of Ontario's forests.	Achieved	The desired level was all inspections in compliance and target was a maximum of 5% of inspections having a minor non-compliance; zero inspections having a moderate or major non-compliance with respect to site disturbance. There were no reports of non-compliance with respect to site disturbance. This objective was achieved.
Objective 6: Social and Economic - community well-being		

<p>Forest Cover - values dependent on the Crown forest</p> <p>6.2 To plan and manage forest access in such a manner that achieves a balance between accessed areas and remote roadless and/or functionally roadless areas for those who value this attribute of the forest</p>	<p>Not Achieved</p>	<p>The desired level is to maintain or reduce the road density (km road/km²) on the Martel Forest with a target to maintain to less than 15% above the existing road density. The starting level was of 0.48 km road/km² and it increased to 0.79km road/km² which exceeds the 15% target from the road density start. This objective was not achieved.</p>
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APPENDIX 3. COMPLIANCE WITH CONTRACTUAL OBLIGATIONS

Licence condition	Licence holder performance
Payment of Forestry Futures and Ontario Crown charges	All Forestry Futures charges and Ontario Crown charges have been paid.
Wood supply commitments, MOAs, sharing arrangements, special conditions	SFL shareholders (GreenFirst Chapleau, Hornepayne Lumber LP and Columbia Rutherglen) as well as supply agreement holder Levesque Plywood Limited all indicated that they were satisfied that their related commitments were being met. Current wood supply commitments are as follows: GreenFirst Chapleau: All SPF Martel Strategic Management Zone (SMZ) Hornepayne Lumber LP: All SPF Magpie SMZ Columbia Rutherglen: 400,000m3 Po (net merchantable) Levesque Plywood Ltd: Available Bw veneer
Preparation of FMP, AWS and reports; abiding by the FMP and all other requirements of the FMPM and CFSA	All required plans and reports were prepared to the required standards.
Conduct inventories, surveys, tests and studies; provision and collection of information in accordance with the FIM	All required surveys are completed, and the data is consistent with the FIM
Wasteful practices not to be committed	No wasteful practices were identified during the audit.
Natural disturbance and salvage SFL conditions must be followed	Not audited following the risk assessment.
Protection of the licence area from pest damage, participation in pest control programs	Not audited following the risk assessment
Withdrawals from licence area	Not audited following the risk assessment
Action plan and progress towards the completion of actions as reported in annual reports or status reports prepared under previous versions of the Independent Forest Audit Process and Protocol	Action plan and status reports were prepared in accordance with contractual obligations
Payment of forest renewal charges to the FRT	All forest renewal charges have been paid.
FRT eligible silviculture work	The SFL completed FRT eligible work in accordance with planned specifications and funding eligibility requirements. A Specified

Licence condition	Licence holder performance
	Procedures audit was completed for the 2022-2023 fiscal year. No abnormalities were reported.
FRT forest renewal charge analysis	Forest renewal charge analysis was completed by the SFL annually and reviewed/approved by the Regional Director. The SFL provides additional information in the form of a current silviculture liability summary in support of the annual analysis.
FRT account minimum balance	FRT account minimum balances were met each year on both the former Magpie and Martel forests as well as for the amalgamated Missinaibi Forest.
Silviculture standards and assessment program	The SFL complies with required standards and assessment programs as prescribed in the FMP
First Nations and Métis opportunities	Missinaibi Forest Management Inc. is an enhanced Sustainable Forest Licence (eSFL) that includes four First Nation shareholders in the company, and representation on the board of directors. As such, these First Nations are included in decision-making authority on the Missinaibi Forest.
Preparation of compliance plan	The approved FMP has a 10-year strategic compliance plan. Annual compliance plans were prepared each year for the AWS
Internal compliance prevention/education program	There is a good internal compliance prevention program which it utilizes with its contractors and staff. The Missinaibi Forest is FSC certified which places an emphasis and sets targets on continued education of all workers on the Forest. The SFL conducts a spring meeting with OLLs to review AWS maps, operational plans as well as compliance requirements for the upcoming year.
Compliance inspections and reporting; compliance with compliance plan	The SFL completes compliance inspections in accordance with compliance plans and requirements. Compliance reporting is generally up to date and keeps pace with operations.

Licence condition	Licence holder performance
SFL forestry operations on mining claims	No evidence of forest operation impacts on mining claims.

APPENDIX 4. AUDIT PROCESS

REQUIREMENT FOR INDEPENDENT FOREST AUDITS

IFAs are legally required under Ontario Regulation 319/20, made under the Crown Forest Sustainability Act (CFSA). The key source of direction for the IFA comes from the Independent Forest Audit Process and Protocol (IFAPP). IFAs are governed by eight guiding principles as described in the 2024 IFAPP:

1. Commitment,
2. Public consultation and First Nation and Métis involvement and consultation,
3. Forest management planning,
4. Plan assessment and implementation,
5. System support,
6. Monitoring,
7. Achievement of management objectives and forest sustainability, and
8. Licence and 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 forest and communities. The IFA findings are addressed by the auditees (SFL holder, District, Region and Corporate MNR) in the IFA action plans and results will be reported in annual reports.

The sections below provide a description of how the evidence was collected and reviewed.

RISK ASSESSMENT

The IFA was started with the risk assessment to determine which IFAPP protocols are relevant for the Missinaibi Forest specifically. The selected protocols can be found in the table below. The risk assessment as per the IFAPP required the assessment of optional procedures by the audit team. Protocols subject to review for the risk assessment are in Appendix A of the IFAPP and marked as Optional.

The decision to include those procedures in the audit sample was based on the following:

- There was a finding in the 2017 Martel IFA that required the review of the TOR The interviews also indicated concerns related to the LCC in relation to the amalgamation of the Martel and Magpie Forests as well as concerns related to the overall function and membership of the LCC

- There was one issue resolution during the 2021 Missinaibi FMP planning process
- There were lots of changes in the Forest as a result of the merger of the Magpie and Martel Forest. With the merger, GreenFirst took over management of the Magpie portion of the Forest from the previous service provider to MNR. In addition, human resource issues in MNR were highlighted in previous IFA Majority of the current management positions are filled with newer staff.
- There have been concerns with the document control with Wawa district as it pertains to the LCC consultation record (2017 Martel IFA) and First Nation and Métis consultation (Pic Forest IFA 2022 – some overlapping First Nation and Métis communities).
- Limited qualified staff, high staff turnover, new training process requirements and availability of qualified trainers.
- Based on interviews, there may be some issues with some licensees fulfilling all of their obligations.
- New training process requirements and availability of qualified trainers.

Table 9. Procedures audited, by risk category (includes the number of procedures from the current IFAPP that were selected by the audit team).

Principle	Optional – Applicable (#)	Optional – Selected (#)	Optional – % Audited	Mandatory – Audited (#) (100% Audited)	Comments
1. Commitment	2	0	0	0	
2. Public consultation and First Nations and Métis involvement	5	2	40	2	2.2.1 2.3
3. Forest management planning	39	0	35	35	-
4. Plan assessment and implementation	3	0	9	9	-
5. System support	2	2	100	0	5.1 5.2
6. Monitoring	10	2	20	9	6.2.1 6.2.2
7. Achievement of management objectives and forest sustainability	0			14	-
8. Contractual obligations	6	1	17	28	8.1.17
Totals	67	7	10	97	-

AUDIT PLAN AND SITE SELECTION

The audit plan outlined the protocols selected with the rationale, key contacts, and audit schedule. A pre-audit meeting was held with discussion regarding site selection following. Field site samples were selected by the audit team with logistical information provided by the Auditees. The initial site selection was a 20% sample of the harvest and silviculture operations. This was netted down after consulting with the SFL holder regarding method of access (truck or helicopter) to a minimum 10% sample. There were no sites brought forward by stakeholders, First Nation or Métis communities, nor the general public.

The sites were selected according to the IFAPP using shapefiles provided by the SFL holder. The areas were selected randomly by operating year, forest management activity, species renewed and access. Water crossings, forestry aggregate pits and wood storage yards were also selected. A 10% sample of the area within the FRT specified procedures audit was also selected by the audit team for the 2022-2023 year. This level of sample was achieved.

The field audit consisted of 2 field days with 2 trucks and 1 day via helicopter during September 17 – 19. The closing meeting was held on September 27, 2024 where draft findings were presented to the auditees with the draft Appendix 1. Comments received from the SFL and the MNR on the audit findings were taken into consideration during audit report development.

Table 10. Field audit site selection, including 10% of activities notes in the Specified Procedures Report.

Activity or Feature	Stratum size	Proposed sample size	Actual sample size	Actual sampling intensity (%)
Water Crossings	190 crossings	19 crossings	19 crossings	100%
Forest Aggregate Pits	214 pits	21 pits	21 pits	100%
Tending	10,146 ha	1,015 ha	1,078 ha	106%
Site Preparation	7,488 ha	749 ha	811 ha	108%
Harvest	30,996 ha	3,100 ha	3,164 ha	102%
Regeneration	29,272 ha	2,927 ha	2,986 ha	102%
Wood Storage Yard	6 WSY	1 WWSY	1 ha	100%
Roads	1,292 km	129 km	131 km	102%
*Free-to-Grow	26,362 ha	2,636 ha	2,667 ha	101%
Tending (FRT funded**)	2,014 ha	201 ha	209 ha	104%
Site Preparation (FRT funded**)	906 ha	91 ha	95 ha	104%
Regeneration (FRT funded**)	5,390 ha	539 ha	570 ha	106%
Slash and Chip Treatment	16 km	2 km	26 km	130%

* No Free-to-Grow reported in the 2021-2022 period.

** Specified Procedures Audit conducted on the 2022-2023 fiscal year.

Public Consultation

Public input to the audit was solicited as follows: 1) through LCC participation; and 2) through a variety of outreach efforts including notices advising the public that an Independent Forest Audit will be conducted on the Missinaibi Forest and inviting comments regarding matters relevant to the audit period. Notices were published in the Chapleau local newspaper, as well as shared via the Municipality of Chapleau Facebook page, Chapleau Community Bulletin Board Facebook page, and Wawa and Area Community Facebook page, Hawk Junction community Facebook page, Dubreuilville classified Facebook page and circulated by the SFL holder and MNR for the region.

In total, nine responses were received via surveys. Over half of the comments were positive and acknowledged the good communication with GreenFirst, good forest management practices (viewscape maintenance, harvesting practices, and road maintenance). The main concerns were related to the harvest amounts that seemed too excessive to two respondents, and wasteful practices in terms of amount of wood left on harvest areas. One person commented that there were issues with silviculture and road maintenance in the Magpie portion of the Forest under Crown management.

First Nation and Métis Consultation

All of the 16 First Nation and Métis communities on the FMP list were contacted as per the advice of the Chapleau/Wawa District Resource Liaison Specialists. This included an email in the pre-audit stage, as well as two email invitations prior to the field audit in September. The audit team also reached out to representatives of Wahkohtowin Development GP Inc., a social enterprise company representing Brunswick House, Chapleau Cree and Missanabie Cree. Representatives (Lands and Resources staff) of Michipicoten and Chapleau Cree First Nations participated in the field audit. The audit findings considered information provided through interviews during the field audit and follow-up emails, as well as an email response provided from the Director of Lands and Resources, Missanabie Cree First Nation. The Red Sky Métis Independent Nation requested and received a presentation of the draft audit findings.

Missinaibi Forest Local Citizens Committee (LCC)

The 2024 IFA was discussed at LCC meetings prior to the audit, where members were encouraged to participate. Two email invitations to participate in the field audit and/or interviews were also sent by the audit team to the members of the Missinaibi Local Citizens Committee. There were no responses from LCC members, and none participated in the field audit. The audit team interviewed two LCC members on the field tour (who were participating in a different capacity) and reached out to three individual members for interviews. Two additional interviews were conducted by telephone.

Licensees, Contractors and Commitment Holders

Representatives from GreenFirst, Columbia Forest Products, White River Forest Products and Hornepayne Lumber attended the field audit for both truck field days and were interviewed.

There were no issues brought forward during the discussions. Follow up discussions were held with GreenFirst staff to clarify draft audit findings.

Ministry of Natural Resources

MNR District, Region and Divisional Support Branch staff participated in all aspects of the audit, including the field audit and interviews. Several follow up meetings were held with applicable MNR staff to clarify draft audit findings.

Forestry Futures Trust Committee

Two representatives of the Forestry Futures Trust Committee participated in the field audit and two or more members attended the pre-audit, opening and closing meetings.

APPENDIX 5. LIST OF ACRONYMS USED

ACOP – Annual Compliance Operations Plan
ACP – Annual Compliance Plan
AOC – Area of Concern
AR – Annual Report
AWS – Annual Work Schedule
CFSA – Crown Forest Sustainability Act
CP – Contingency Plan
FAP – Forest Aggregate Pit
FIM – Forest Information Manual
FMP – Forest Management Plan
FMPP – Forest Management Planning Manual
FOIP – Forest Operation Information Program
FRI – Forest Resources Inventory
FRT – Forest Renewal Trust
FSC – Forest Stewardship Council®
FTG – Free-to-Grow
IFA – Independent Forest Audit
IFAPP – Independent Forest Audit Process and Protocol
LCC – Local Citizens' Committee
MNR – Ontario Ministry of Natural Resources
NWES – NorthWinds Environmental Services
R.P.F. – Registered Professional Forester
SFL – Sustainable Forest Licence
SGR – Silviculture Ground Rule
SMZ – Strategic Management Zone

APPENDIX 6. AUDIT TEAM MEMBERS AND QUALIFICATIONS

Name	Role	Responsibilities	Credentials
Triin Hart, P.h.D.	Lead Auditor for pre-field audit portion of the IFA (then replaced by Rike Burkhardt)	<ul style="list-style-type: none"> • Develop audit plan • Lead pre-audit meetings • Participate in site selection • Review draft and final audit report 	Triin has 15 years' experience in resource management and forestry. Her expertise includes policy analysis, landscape ecology, Species at Risk, emulating natural disturbances, and analyses of ecological implications of planned management activities.
Deanna Hoffman, R.P.F.	Auditor	Review of the following audit procedures: <ul style="list-style-type: none"> • forest management planning, monitoring and reporting (FMP, CP, AWSs, ARs) • determination of sustainability • silviculture 	Deanna is a Registered Professional Forester in Ontario. She has over 30 years of experience in the forest industry in forest management planning, silviculture, forest operations, forest tenure, and Indigenous relations and capacity building.
Rike Burkhardt, M.F.C., R.P.F.	Lead Auditor, standing in for Triin Hart (for the field audit and subsequent reporting)	Participation on field visits and audit reporting on the following procedures: <ul style="list-style-type: none"> • LCC • First Nation and Métis consultation • public consultation • ecological values management planning and implementation • contractual obligations • socioeconomic impacts 	Rike is a Registered Professional Forester with over 25 years experience in forestry and natural resource management and policy. She has been an audit team member on 12 IFAs, interviewing many stakeholders and First Nation/Métis communities with interests in forests across the province.
Ryan Murphy, R.P.F.	Auditor	Forest operations and compliance	Ryan is a Registered Professional Forester with over 20 years of management experience in the forest industry. Ryan led the planning, operations, renewal and sustainability files for numerous large facilities and SFLs in Ontario.