

Wabadowgang Noopming Forest Independent Forest Audit 2024

April 1, 2016 – March 31, 2024



Prepared by
Caliber Consulting Co.
November 19, 2024

King's Printer for Ontario, 20324



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1.0 Executive Summary

This report presents the findings of an Independent Forest Audit of the Wabadowgang Noopming Forest conducted by Caliber Forestry Services. The audit followed the risk-based approach as outlined in the 2024 Independent Forest Audit Process and Protocol. The audit included a review of documentation and records, field assessments, and opportunities for First Nation, Métis communities and stakeholder input.

The Independent Forest Audit for the Wabadowgang Noopming Forest covered an eight-year period of April 1, 2016 – March 31, 2024. The Wabadowgang Noopming Forest is a Crown Forest Management Unit that is managed under a Forest Resource Licence through a Forestry Agreement with Wabadowgang Noopming Forest Management Inc. The Forest is administered by the Ministry of Natural Resources Thunder Bay Ignace District in the Northwest Region. The Armstrong Local Citizens Committee is associated with the Forest.

The Wabadowgang Noopming Forest area was previously included in the Lake Nipigon Forest with the Ministry of Natural Resources managing the Armstrong portion from 2011 – 2021. A de-amalgamation of the Armstrong portion was finalized with the writing of the 2021-2023 Wabadowgang Noopming Contingency Plan. There have been some boundary changes with the addition of approximately 21,000 hectares called the Caribou east parcel.

The audit scope covers the implementation of Phase II of the 2011-2021 Lake Nipigon Forest Management Plan (years 6,7,8,9,10), the preparation of the 2021-2023 Wabadowgang Noopming Forest Contingency Plan, the implementation of the contingency plan (years 1, 2), the preparation of the 2023-2033 Wabadowgang Noopming Forest Management Plan, and implementation of the Wabadowgang Noopming Forest Management Plan (year 1).

The Wabadowgang Noopming Forest is not certified by a third-party forest management certification system.

The auditors found that the Wabadowgang Noopming Forest Management Inc. and Ministry of Natural Resources Thunder Bay Ignace District staff are a dedicated, professional team. The Armstrong Local Citizens Committee is established, and meetings are held to discuss the necessary elements. However, there are improvements that could be made to the Local Citizens Committee membership as it should include a balance of all the local interests and users of the forest. Wabadowgang Noopming Forest Management Inc. and the Ministry of Natural Resources District staff have been responsive to the public, stakeholder, Métis and Indigenous input and concerns.

The forest is located adjacent to the Wabakimi Provincial Park, in an area with many remote tourism concerns, which have influenced some forest management

activities through Areas of Concern prescriptions and access management restrictions. The Ministry of Natural Resources has struck a balance between the desire for access to the forest, for traditional use by First Nations, and the desire to reduce access for remote tourism interests.

The forest is far from markets and not large in size. The majority of the forest is boreal conifer with some deciduous mixedwood forest types. The available wood supply from the forest is not being fully utilized due to a lack of markets or distance from processing facilities for some species/products, as a result, the reduced harvest is concentrated in southern conifer dominant forest types.

Overall, the objectives of the 2011-2021 Lake Nipigon Forest Management Plan were met, any deviations have been assessed and the impacts on sustainability determined. New objectives were incorporated into the 2023-2033 Wabadowgang Noopming Forest Management Plan to meet the changing requirements. However, a review of documents revealed that there was a struggle with The Forest Management Guide for Boreal Landscapes (Boreal Landscape Guide or BLG) direction to increase conifer in the forest to meet the habitat needs of the boreal caribou. Opposition to the use of herbicide and the expense and availability of alternate tending treatments to control hardwood will impact the future conifer component of the forest. A tending protocol was not developed, despite being identified as an action to address a finding in the 2016 Independent Forest Audit.

The forest management plan sets a direction for the forest through analysis, modeling and an objectives table that is reviewed during the plan development and as it is being implemented. The auditors found that the renewal targets are not well enough defined to be measured. In addition, the wording of an objective to protect values was worded incorrectly.

Overall, forest management operations were found to be well done. The harvest operations did not cause significant site disturbance, and good utilization was observed.

The silviculture program relies on artificial regeneration for over half of the forest renewal. The forest manager employs local contractors for most of the tree planting. A local nursery produces the majority of the planting stock. It was evident in the field that a lack of tending will reduce the success of re-establishing conifer dominated stands. Those areas left for natural regeneration were developing well.

Forest operations monitoring was identified as a shortcoming in the 2016 Independent Forest Audit. This audit found that through a concerted effort by the Ministry of Natural Resources all renewal monitoring was completed and reported as required. The auditors confirmed that the renewal establishment information collected and reported is correct.

Since this is a Crown Forest Unit, the Ministry of Natural Resources maintains responsibility for the roads. The roads and aggregate pits were in reasonable condition. All water crossings and bridges are required to be inspected on a prescribed schedule. The audit found that the Ministry of Natural Resources does not have an effective inspection program for bridges that are used for heavy truck hauls.

The audit team reviewed the contractual obligations in the licence and found that they were being met. All dues were paid, and the renewal trust fund is above the minimum balance. The work undertaken during the term of the specified procedures review was completed as reported.

Overall, the audit team concludes that the management of the Wabadowgang Noopming Forest was generally in compliance with the legislation, regulations, and policies that were in effect during the period covered by the audit, and the Crown Forest was managed in compliance with the terms and conditions of the Crown Forest Sustainability Act and the forest resource licence held by Wabadowgang Noopming Forest Management Inc. The forest is being managed consistent with the principles of sustainable forest management, as assessed through the Independent Forest Audit Process and Protocol.

Janet Lane, R.P.F., Lead Auditor

Seal

A handwritten signature in cursive script that reads "Janet Lane".

2.0 Table of Findings

Concluding Statement	
Overall, the audit team concludes that the management of the Wabadowgang Noopming Forest was generally in compliance with the legislation, regulations, and policies that were in effect during the period covered by the audit, and the Crown Forest was managed in compliance with the terms and conditions of the Crown Forest Sustainability Act and the forest licence held by Wabadowgang Noopming Forest Management Inc. The forest is being managed consistent with the principles of sustainable forest management, as assessed through the Independent Forest Audit Process and Protocol.	
FINDINGS	
Finding #1	The Armstrong Local Citizens Committee does not represent a balance of interests.
Finding #2	The tending protocol was not developed, despite being identified as an action to address a finding in the 2016 Independent Forest Audit.
Finding #3	The lack of a tending operation is reducing the success of re-establishing conifer dominated stands.
Finding #4	The MNR does not have an effective bridge inspection program for bridges that are used for heavy truck hauls on an annual basis.
Finding #5	The objectives table contains some targets that are not clear or concise.
BEST MANAGEMENT PRACTICES	
Best Management Practice #1	The recognition of a portage value and subsequent shaping of the trail to facilitate the portage is exemplary.

Table 1. Findings

3.0 Introduction

This report presents the findings of an Independent Forest Audit of the Wabadowgang Noopming Forest (WNF) by Caliber Forestry Services. The audit followed the risk-based approach as outlined in the 2024 Independent Forest Audit Process and Protocol (IFAPP).¹

The Independent Forest Audit for the WNF covered an eight-year period of April 1, 2016 – March 31, 2024. The WNF is a Crown Forest Management Unit that is managed under a Forest Resource Licence (FRL) through a Forestry Agreement (FA) with Wabadowgang Noopming Forest Management Inc (WNM). The Forest is administered by the Ministry of Natural Resources (MNR) Thunder Bay Ignace District in the Northwest Region. The Armstrong Local Citizens Committee (ALCC) is associated with the Forest.

The Wabadowgang Noopming Forest area was previously included in the Lake Nipigon Forest with the Ministry of Natural Resources managing the Armstrong portion from 2011-2021. A de-amalgamation of the Armstrong portion was finalized with the writing of the 2021-2023 Wabadowgang Noopming Contingency Plan. There have been some boundary changes with the addition of roughly 21,000 hectares in an area referred to as the Caribou east parcel.

The audit scope covers the implementation of Phase II of the Lake Nipigon Forest (LNF) 2011-2021 Forest Management Plan (FMP) (years 6,7,8,9,10), the preparation of the 2021-2023 Wabadowgang Noopming Contingency Plan (CP), the implementation of the CP (years 1, 2), the preparation of the 2023-2033 Wabadowgang Noopming FMP, and implementation of the Wabadowgang Noopming FMP (year 1).

The audit included a review of documentation and records, field assessments and provided opportunities for stakeholder input.

3.1 Audit Process

Independent Forest Audits (IFAs) are a requirement of the Crown Forest Sustainability Act (CFSA)². All Sustainable Forest Licences (SFLs) and Crown Management Units must be audited once every ten to twelve years by an independent auditor. The 2024 IFAPP was used as the guiding document to assess if the forest is meeting the requirements of Ontario Regulation 319/20

¹

OMNR. 2024. *Independent Forest Audit Process and Protocol*, Toronto. Queen's Printer for Ontario. 222pp.

²

Crown Forest Sustainability Act, 1994, S.O. 1994, c. 25

made under the CFSA. The auditees include the FRL holder and applicable MNR Districts, Region, and corporate organizations.

The auditors review audit criteria (Appendix A of the IFAPP), previous audit results, and provided background information to determine through risk assessment which, if any, optional audit criteria to recommend for inclusion in the audit. For this audit, eighteen optional procedures were added. They included criteria to assess the auditees commitment to sustainability, establishment of the Local Citizens Committee, the issue resolution process, plan production activities, the new forest resources inventory, the quality of the fish and wildlife information provided, the implementation of the caribou harvest strategy, regeneration monitoring, Contingency Plan development and implementation, compliance plan production and monitoring, the amendment processes, annual report production, and forestry operations on mining claims. The final audit scope was reviewed and accepted by the Forestry Futures Trust Committee (FFTC) and approved by MNR.

The procedures and criteria for the delivery of the IFA are specified in the 2024 IFAPP. The audit assesses the auditees compliance with the approved forest management plans, Forest Management Planning Manual (FMPM) and the CFSA in conducting forest management planning, operations, monitoring, and reporting activities. The audit assesses the effectiveness of forest management activities in meeting the management objectives in the applicable forest management plan. The field audit assesses whether actual results are comparable with planned results, whether approved prescriptions were followed, and whether forest operations were accurately reported.

The audit report outlines non-conformances as well as best management practices. Findings of non-conformances are observations by the audit team where requirements were not fully met or where a significant lack of effectiveness in forest management activities was identified. Best management practices are recognized when auditees' actions go beyond the legal requirements and result in positive outcomes for the forest and communities. IFA findings of non-conformances are addressed by the auditees in an action plan and the progress towards the completion of these actions will be reported in the Annual Reports (ARs) for the Forest Management Unit (FMU). Details on the audit plan and processes are provided in Appendix 4.

Caliber Forestry Services conducted the field audit in July 2024, utilizing a three-person on-site team. Profiles of the audit team members, their qualifications, and responsibilities are provided in Appendix 6.

3.2 Management Unit Description

The WNF is located in the MNR Northwest Region. The Thunder Bay Ignace District administers the WNF. The WNF is a Crown Forest Unit previously known

as the Armstrong Forest. It was amalgamated with the Lake Nipigon Forest and managed according to the 2011 Lake Nipigon Forest Management Plan. A de-amalgamation of the Armstrong portion was finalized with the writing of the 2021-2023 Wabadowgang Noopming Contingency Plan (CP). Previous to 2021, the MNR directly managed the Armstrong portion and Lake Nipigon Forest Management Inc managed the former Lake Nipigon portion.

The communities located within the management unit include the unincorporated communities of Armstrong, and Collins. Local communities have been involved in the development of the forest management plan.

The following Indigenous Communities have traditional territories that are overlapping or adjacent to the Wabadowgang Noopming Forest:

- Kiashke Zaaging Anishinaabek (KZA) (Gull Bay) First Nation
- Métis Nation of Ontario – Region 2
- Namaygoosisagagun (Collins) Non-status Ojibwa Community
- Red Sky Métis Independent Nation
- Whitesand First Nation
- Whitewater Lake Non-status Ojibwa Community

Wabadowgang Noopming Forest Management Inc. is a Forest Management Company that is majority owned by Whitesand First Nation and minority owned by NorthWinds Environmental Services (NWES).

Tourist outfitting, recreational use, and general forest use by the local population is high. There are local citizens, business owners, and First Nations representatives that have been very active in the forest and involved in forest management planning during open houses and as participants on the Armstrong LCC.

There is a long history of forest activity in WNF. The wood produced from the forest typically flowed to Nipigon, Red Rock and Thunder Bay. Since 2008 the forest industry had significant downtime and there have been changes in forest product demands. The demand for wood products from the forest has recovered recently with year-round harvest and a Memorandum of Agreement (MOA) with Resolute FP Canada Inc. has been signed to supply sawlogs to Thunder Bay.

The Armstrong Local Citizens Committee (ALCC) is the only local citizens committee associated with the WNF. The committee has representation from Armstrong Centre and Collins, both of which are directly affected by the Wabadowgang Noopming Forest operations and plans.

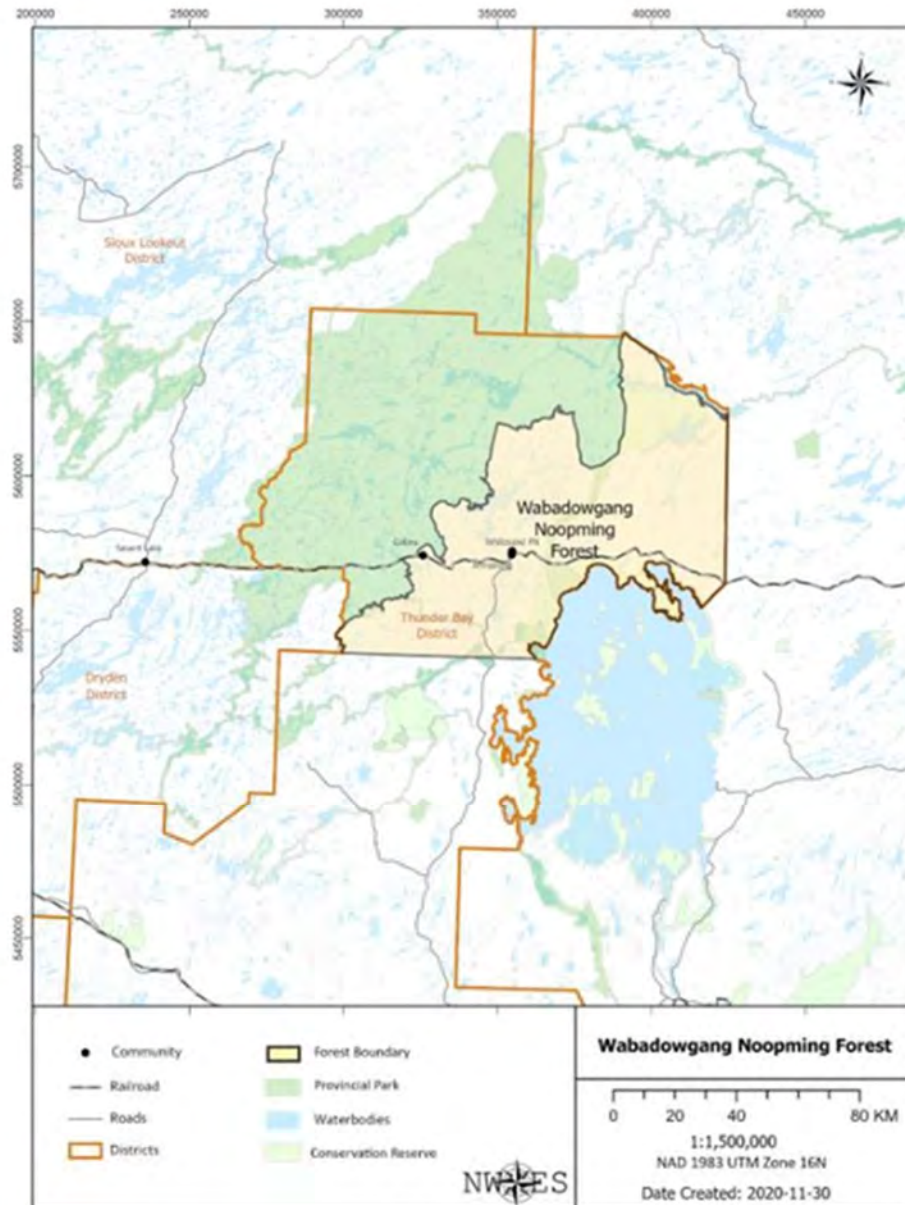


Figure 1 Wabadowgang Noopming Forest Map

Credit: 2023-2033 Forest Management Plan Wabadowgang Noopming Forest

The WNF is located northwest of Lake Nipigon and lies within the northern portion of the Thunder Bay Ignace Administrative District. It is about 230 km north of the City of Thunder Bay and is accessible via Highway #527. This forest is bordered by the Ogoki Forest to the north and the Black Spruce Forest to the south. The Wabadowgang Noopming Forest is also bordered on the west, and northwest, by Wabakimi Provincial Park, on the southeast by the Lake Nipigon Forest, and on a small portion of the southwest side by the English River Forest.

The WNF lies completely within the Precambrian shield of the Hills Site Region 3W of the Boreal Forest Region. The topography throughout most of the forest is bedrock controlled, and the most dominant type of surficial deposit consists of ground moraine.

The WNF is approximately 632,231 hectares of Crown land. Most of the land base is available for forest management. However, there are two conservation reserves and four provincial parks located within the WNF that are classified as forested but not available for management, as labeled in figure 2 as Forested Not Managed. While the majority is forested Crown land available for forest management activities, very large restrictive areas, AOC prescriptions, around tourist operations and along the border of the Wabakimi Provincial Park, that limit forest management opportunities.

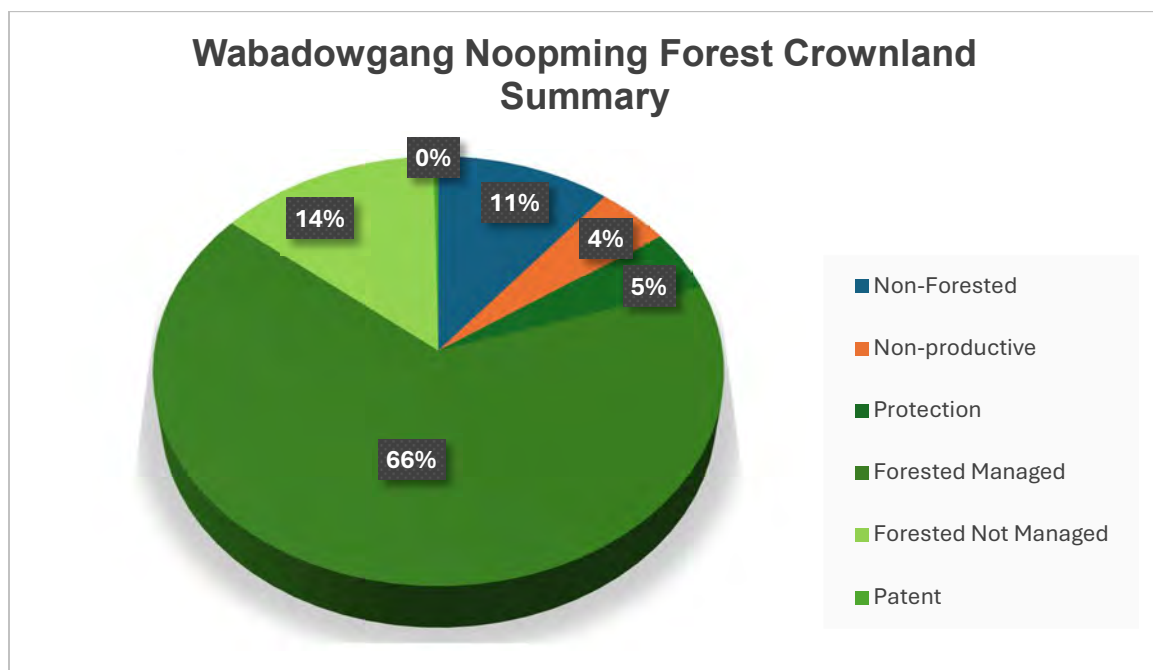


Figure 2. Crown Land Summary Wabadowgang Noopming Forest

The forest is located within the Nipigon and Brightsand ranges for Boreal caribou. This species at risk habitat management has a major influence in landscape level planning. The integrated range assessments by the province of Ontario in 2010 and 2011³, respectively, concluded that risk to caribou is uncertain within the Nipigon Range, risk to caribou is intermediate within the Brightsand Range and for both ranges it is uncertain whether range condition is sufficient to sustain

³ <https://www.ontario.ca/page/caribou-boreal-population>

caribou. The range population of Boreal caribou was considered stable in the federal recovery strategy produced in 2012 ⁴and amended in 2019⁵.

The forest composition consists of stands of pure conifer, pure hardwood, mixed conifer hardwood, and some lowland. The standard forest units for the Northwest Region were assessed against the inventory and, with the exception of a few combinations, adopted as the basis for forest classification.

Forest Unit	Description of Forest Type
BfMx1	Balsam Fir Mixedwood
BwDom	Birch Dominant
ConMX	Conifer Hardwood Mix + Upland Cedar
HrdMw	Hardwood Mix + Other Hardwood
HrDom	Hardwood Dominant
OcLow	Other Conifer Lowland
PjDom	Jack Pine Dominant
PjMx1	Jack Pine Dominant Conifer Mixedwood
PoDom	Poplar Dominant
PrwMx	Red and White Pine Mixed
SbDom	Black Spruce Dominant
SbMx1	Black Spruce Dominant Conifer Mixedwood
SbLow	Black Spruce Lowland

Table 2. Wabadowgang Noopming Forest Unit Description

Over half of the area is classed as conifer leading. Black spruce and jack pine are the leading conifer species. Balsam fir, larch and cedar make up a minor component of conifer. Only 18% of the forest is classed as hardwood leading. Poplar and birch are the primary hardwood species. There are only 30.8 hectares classed as red pine - white pine mixed which indicates that at least 40% of the component is red pine or white pine. Additionally, 21% is classed as lowland.

⁴

Environment Canada. 2012. Recovery Strategy for the Woodland Caribou (*Rangifer tarandus caribou*), Boreal population, in Canada. Species at Risk Act Recovery Strategy Series. Environment Canada, Ottawa. xi + 138pp.

⁵ <https://www.canada.ca/en/environment-climate-change/services/species-risk-public-registry/recovery-strategies/woodland-caribou-boreal-2019.html#toc9>

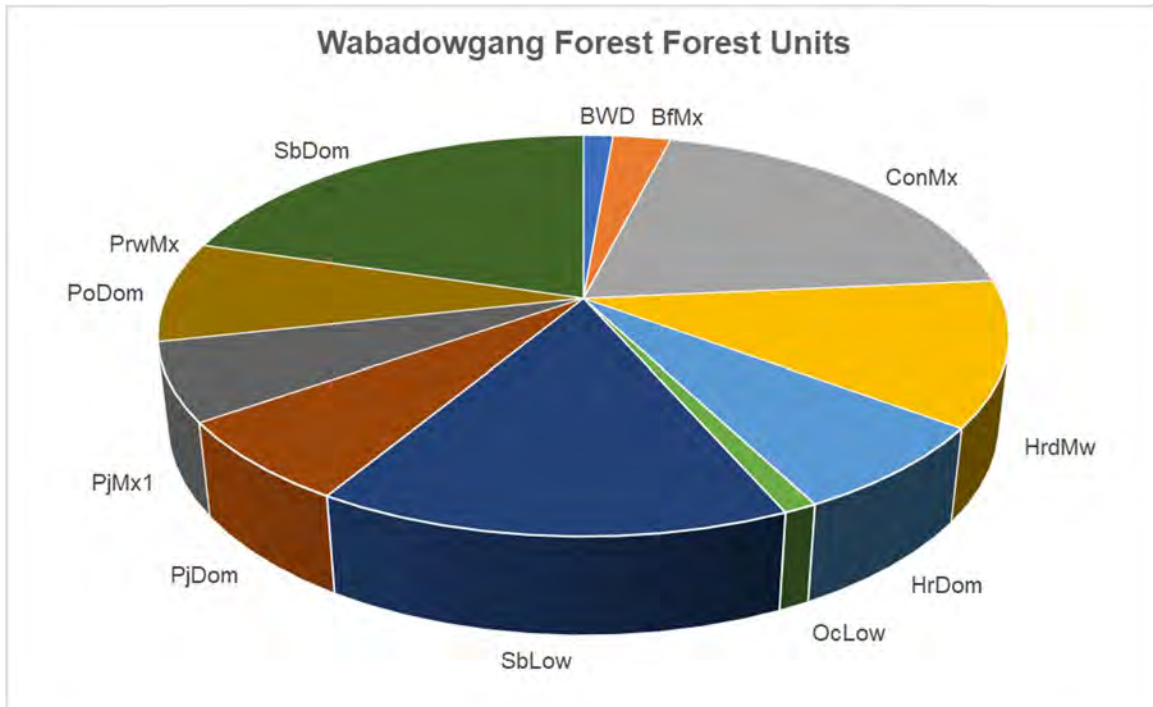


Figure 3. Forest Units on the Wabadowgang Noopming Forest

The WNF is comprised of older forest types with almost a third of the area in an overmature state. Almost 70% of the forest is in a mature to overmature state. The lowland areas contribute more to the older age class than other forest units. The overmature nature of the upland forest could pose a risk of fire or other stand replacing events. Figure 3 illustrates the age class distribution on the forest.

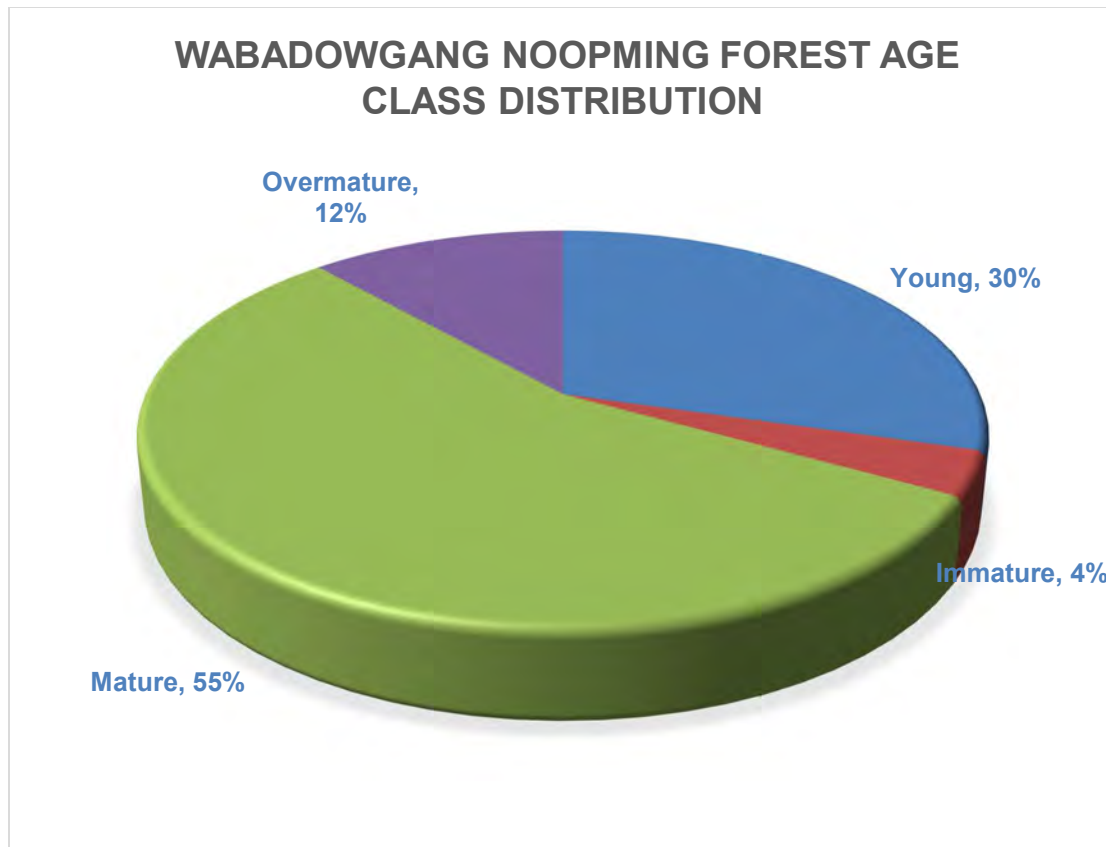


Figure 4. Age class distribution of stands on the Wabadowgang Noopming Forest.

The forest has not experienced major stand replacing natural disturbances since the 1940s but there has been snow and wind damage that has significantly affected stand volumes. In the fall of 2001 wet snow and high winds caused severe widespread damage which has resulted in stands with flattened and broken stems. The expected yields have been adjusted to account for this natural loss.

An addition of just over 21,000 hectares along the south eastern edge of Wabakimi Provincial Park has been included in the WNF. This area has had a little historic logging and has a few open roads.

In summary, this is a productive forest composed of mostly upland conifer dominant mature and over mature stands. While it is currently under utilized, it is available to meet the social, economic and environmental needs.

4.0 Audit Findings

4.1 Commitment

The 2024 IFAPP commitment principle validates that an organization's commitment is reflected in the auditee's vision, mission, and policy statements and in their adherence to legislation and policies. Wabadowgang Noopming Forest Management Inc. states on its website <https://www.wnforest.com/> the organization's mission, and commitment to sustainable forestry practices. Interviews with the WNM confirmed that they are dedicated to training their forest management team and have promoted continual improvement.

The MNR's commitment to sustainable forest management, as assessed through the IFAPP, is demonstrated through the adherence to and implementation of Ontario's forest management policy framework, consistent with the requirements of the CFSA. These policies are communicated to the resource users and the public through public consultation and engagement processes undertaken by MNR. MNR's vision and mission statements are widely distributed on its websites <https://www.ontario.ca/page/ministry-natural-resources-and-forestry> and is posted at its various District Offices. Policies are in place <http://www.ontario.ca/document/guide-crown-land-use-planning/part-i-policies-crown-land-planning-processes-20-crown-land>. Interviews confirmed that training is ongoing as new guides are released. It is our assessment that MNR met the requirements of the IFAPP commitment principle.

4.2 Public Consultation and First Nations and Métis Community Involvement and Consultation

The pandemic altered the traditional means of public consultation; however, the public consultation process for the plan and amendments met the requirements of the FMPM. Several opportunities for stakeholders to consult with MNR were provided and the requirements of the FMPM were followed. The public consultation records for the 2021-2023 WNF Contingency Plan and 2023-2033 WNF FMP were well documented.

There were no resource stewardship agreements as this is a Crown Forest unit, however, remote-based tourism operators' concerns were addressed as received. The AOCs that are applied on the WNF to protect tourism values cover significantly larger areas than in most forests. Viewsheds were protected in areas where they were a concern. Some access concerns were brought to the Regional Director for issue resolution.

Three meetings were held with the First Nations communities and the Armstrong LCC (ALCC) to define the desired forest and benefits. The use of herbicide, trapper values, and water quality were identified as the major concerns.

The First Nation and Métis communities are very engaged in forest management planning and forest operations on the forest. WNM is majority owned by Whitesand First Nation. All indigenous communities were invited to participate in the forest management planning process for the 2021-2023 WNF contingency plan and the 2023-2033 WNF FMP development.

The ALCC is a standing committee appointed by the Thunder Bay Ignace District Manager. They have current terms of reference that are reviewed annually. The terms of reference outlined the stated purpose for the ALCC. The ALCC has a membership list that includes members representing naturalists, tourism, local economic development, Indigenous communities, trappers, hunters, anglers, mining, crown recreation, local business, and the forest industry.

A review of the committee's comments and discussion through the plan indicated that the committee is not balanced. The number of comments disproportionately favours forest preservation, park expansion, and larger reserves. Six of the 14 members were local citizens. The auditors suggest that any vacancies be filled with individuals who represent local community interests.

Finding #1: The Armstrong Local Citizens Committee does not represent a balance of interests.
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The ALCC meets at least twice per year. The ALCC members interviewed indicated that the issue resolution process was followed and was effective in providing direction to move forward. Amendments, annual reports, and annual work schedules are presented to the ALCC. They have one subcommittee to efficiently review FMP amendment requests and provide a timely classification recommendation to the District Manager when a timely response cannot be accommodated through a regular meeting of the Committee.

There is good attendance at most meetings. The ALCC representatives were active participants at planning team meetings. The statement from the ALCC on the 2023-2033 WNF FMP reflects that they are split in agreement with the FMP. Six did not agree with the FMP and six agreed with the FMP. The concerns ranged from the interpretation of Crown Land Use Planning Atlas (CLUPA) direction, the assurance of ecosystem renewal, the use of herbicides, the application of the Boreal Landscape Guide (BLG) fine filter direction, and the season of harvest in some designated areas of tourism concerns.

There were seven issue resolutions requested. The issue resolution requests were received in November of 2022 with meetings convened in December of 2022, and the decision letters were issued January 10, 2023. Two of the requests were resolved and five of the seven proceeded to issue resolution. The meetings were appropriately grouped with issues specific to rip rap on the D'Alton Road and specific to harvest in the Kellar road, D'Alton Road and Rocky Road areas.

The decision letters gave detailed description of the issues, reasoning, and the decision. The issue resolution followed an orderly process.

4.3 Forest Management Planning

The MNR procured the services of NorthWinds Environmental Services to prepare and author the 2021-2023 WNF CP and the 2023-2033 WNF Forest Management Plan. The 2021-2023 WNF CP was developed in accordance with the 2017 FMPM⁶. The 2023- 2033 WNF FMP was consistent with the 2021-2023 WNF CP LTMD and followed the 2020 FMPM⁷. All relevant policies and obligations were followed. The CP was prepared to allow for additional time to develop the FMP and prepare the WNM Forestry Agreement. There were a few delays and changes in the schedule but that is not unusual given the magnitude of the project. Proposed completion dates changed but did not impact the final plan implementation date of April 1, 2023.

The regional planning staff had unprecedented turnover as three different regional planning foresters and four regional planning biologists were involved throughout the development of the plan. There were many resource liaison specialists involved. It was helpful that the district biologist had history with the unit and was stable through the planning timeframe.

The risk assessment identified that the forest resource inventory may have resulted in forest management planning issues. The eFRI was prepared in 2014 (Armstrong and Lake Nipigon), based on aerial imagery captured in 2007 & 2008. The inventory was delivered in December 2016 providing ample time to process updates and corrections. The de-amalgamation and reformation of the WNF boundaries created additional work in developing the eFRI. Interviews identified that the main issues with the inventory were that stand wind damage was not updated leading to stand volume inaccuracies, and that stand age is frequently incorrect.

Landscape level planning for boreal caribou habitat followed the BLG⁸. The Nipigon and Brightsand caribou ranges overlap the WNF. The risk assessment at the start of planning identified that adequate information may not be available to complete the habitat planning. However, an assessment of the information used for caribou habitat planning concluded that there was enough information available and that the BLG was fully implemented in the 2023-2033 WNF FMP.

6

OMNR. March 2017. *Forest Management Planning Manual*, Toronto. Queen's Printer for Ontario. 462

7

(OMNR. May 2020. *Forest Management Planning Manual*, Toronto. Queen's Printer)

8

OMNR. March 2014. *Forest Management Guide for Boreal Landscapes*. Toronto: Queen's Printer for Ontario. 104 pp.

The FMP included a description of fish and wildlife inventories, and other resource inventories and information. There are numerous species at risk (SAR) identified as being, or having the potential to be, present on the FMU. The plan provided a robust list of species and AOC prescriptions for fish and wildlife, including SAR.

Values Maps for bear management areas, cultural, fish, land, tourism, recreation, trapping, and wildlife habitat were included in the final FMP documentation. First Nation values, when identified, were recognized and kept confidential. AOC prescriptions to protect identified values are in place. Tourism values were recognized and AOCs were developed to protect their values.

Desired forest and benefits meetings were held in Whitesand First Nation in November 2019 and the community of Armstrong and the ALCC had a desired forest and benefits meeting in January of 2020. Surveys were distributed at the meetings and 45 surveys were completed. The main concerns identified were: with the use of herbicides, access restriction, negative effects of forest harvesting on trap lines, and decline of water quality. Four plan objectives were developed to address these concerns.

The plan followed the process in the FMPM (2017) to arrive at the LTMD. The Strategic Forest Management Model (SFMM) was used and forest unit definitions were modified to relate to the regional forest units. The Modelling Analysis Task Team completed validation of the Planning Inventory and forest unit classification, receiving approval for Checkpoints #1 and #2. The Modelling Analysis Task Team completed validation of the model inventory and model inputs, receiving approval of Checkpoint #3. The Auditors reviewed the information and have a concern that the strategy to not convert hardwood or mixedwood stands to conifer stands will affect the ability to retain and create future caribou habitat.

Planned harvest levels are consistent with LTMD projections, with an under allocation of 2,356 ha in the BwDom, HrDom, SbLow and PjMx1 forest units. The plan author indicated that it was difficult to fully allocate the LTMD as SFMM is non-spatial and there are large AOCs that are not modeled with a nonspatial model. In addition, a large area near the community of Collins was removed late in the planning process to allow for adequate community input. Contingency harvest area was planned as per FMPM with a total of 1.4 years of harvest on 8,184 ha. identified. Bridging areas (8,232 ha) are proposed to be harvested with specific timeframes assigned to each DCHS area.

The Resource Based Tourism Operators (RBTO) were consulted, and their values have been recognized and AOC prescriptions applied. These reserves appear to be much larger and more restrictive than what is found in other forest management plans in the region. The plan author indicated that there was not

enough time during the plan development to negotiate a change to the AOCs that were in place.

Silviculture ground rules (SGRs) were developed as per the Forest Management Guide to Silviculture in the Great Lakes-St. Lawrence and Boreal Forests of Ontario (2014); based on historic renewal treatments, current forest conditions, and modeling. The post-harvest renewal transition rules were constructed based on past performance. It was recognized that the past silviculture had not been fully implemented as limited tending operations had been used. The transition rules were changed to reflect the intent to not convert hardwood to conifer or conifer to hardwood. Adjustments were made to the outcomes of planting of Pjdom, SbDom and ConMx forest units to reflect the intent to tend more than had been done in the past. This will require the development and implementation of a tending strategy that does not yet exist.

In the last audit there was some criticism about operating on shallow soils. In the new inventory, ecosite and shallow soils are not described or treated separately as a forest unit. No evidence of site damage was observed.

Prescribed burn is listed as an alternative site preparation method. This will require extensive planning and cooperation from the MNR Aviation, Fire and Emergency Services. No prescribed burning area is listed in FMP-17. If this is truly an alternative treatment some prescribed burn should be indicated in this table.

The area of concern prescriptions planning is complete in the FMP. The prescriptions follow the direction of the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (Stand and Site Guide)⁹, the Forest Management Guide for Boreal Landscapes (Boreal Landscape Guide)¹⁰, and values identified by the planning team, during public consultation or carried over from the past FMP. For example, AOC WQWA-1 discussed the avoidance of ephemeral streams, springs, seeps to minimize risk to hydrological functions. Silviculture ground rules, conditions on regular operations and conditions on roads, landings and forestry aggregate pits were developed. There is evidence in the FMP that planning considered the protection of common conditions. The prescriptions are certified by Registered Professional Foresters (RPFs) with signatures on the 2023-2033 WNF FMP, and Annual Work Schedules (AWS). No exceptions to forest management guides were identified.

9

OMNR. 2010. Forest Management Guide for the Conservation of Biodiversity at the Stand and Site Scales. Toronto: Queen's Printer for Ontario. 211 pp.

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⁹OMNR. March 2014. Forest Management Guide for Boreal Landscapes. Toronto: Queen's Printer for Ontario. 104 pp.

Renewal, tending, protection and support were documented in the FMP. Forest management on the WNF relies on both natural (70%) and artificial regeneration (30%). The majority of the artificial regeneration will be through planting. A minor amount of seeding (5%) is identified in FMP-17. About 50% of the artificially regenerated sites are to receive mechanical site preparation. Slash pile burning is planned to be used for recovery of productive land.

Aerial application of herbicides as well as manual tending, are the tending treatment planned for the forest to maintain the conifer species composition. Manual brushing is planned to be used where the application of herbicides is identified as a concern by local First Nations.

The SFMM outputs indicate a renewal program wherein roughly 55% of the conifer forest units will be artificially regenerated. All of the lowland conifer and hardwood dominant sites as well as roughly 45% of the conifer sites will be left for natural renewal. A renewal and maintenance, plus a renewal support program of \$1.13 million annually will support this effort.

Access planning met requirements of the FMPM; including rationale documentation, water crossings identification, conditions on regular operations, forestry aggregate pits and aggregate extraction areas.

The monitoring programs are discussed in the FMP and described in the supplemental documentation. Renewal and compliance monitoring are included. The MNR District Annual Compliance Operations Plan is to be reviewed and updated annually with the targets for the previous year recorded in the plan, which is to be shared with district staff for related follow-up actions and filed for audit purposes.

The 2016 Independent Forest Audit included five recommendations (#1,2,3,4,8) that could have been integrated into the development of the 2023-2033 FMP. One finding was to address findings from the previous 2011 IFA regarding the ALCCs involvement in planning, and compliance planning shortcomings. One was to implement renewal where it has not been initiated. One was regarding MNR compliance planning shortcomings. Two findings were to address herbicide use. One action was to provide information to concerned groups and the other was to develop a protocol on the use of herbicides with concerned groups.

To address the 2016 findings about herbicide use, the MNR District and Regional Operations Division have provided field tours and expert speakers related to herbicides, however concerned groups continue to express apprehension about the use of herbicides in the forest. Chemical tending is included in the SGR table as an optional treatment which will enable them to be used.

A tending protocol was not developed. However, an objective was included in the 2023-2033 FMP to engage with First Nations and Métis communities, within and

adjacent to the WNF, with regards to careful site selection, planning and clear mapping of treatment areas, during the development phase of the FMP, and implementation of the tending. The steps in the objectives table may lead to a collaborative approach to herbicide application. A tending protocol could be developed through engagement but it is not currently stated as a goal.

Finding #2: A tending protocol was not developed as identified in the action plan to address a 2016 Independent Forest Audit finding.
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The Recommendation in the last IFA regarding the improvement of the 10 year and annual compliance plans has been actioned by the MNR. The MNR District Annual Compliance Operations Plan is reviewed and updated annually with the targets for the previous year recorded in the plan which is shared with district staff for related follow-up actions and filed for audit purposes.

Although there may be individual aspects of the 2023-2033 WNF FMP, such as the lack of a clear commitment to tending, that could impact sustainability, the Planning Team made every effort to balance objectives, and understand any potential impacts, while embracing lower levels of risk.

The proposed timelines for the 2021-2023 WNF CP and 2023-2033 WNF FMP were optimistic; however, the movement to a contingency plan and delayed FMP allowed for re-setting timelines to allow for FMP approval prior to implementation date of April 1, 2023.

There was an opportunity for the 2011-2021 LNF FMP to be extended, but the de-amalgamation of the Lake Nipigon Forest on April 1, 2021 created complications thus a Contingency Plan was completed with an LTMD projecting forward with the new management unit.

The 2021-2023 WNF CP proposal and preparation followed the requirements of the 2017 and 2020 FMPM. MNR confirmed NWES was contracted for the preparation of the WNF FMP in March 11, 2019. It was determined that there was not enough time to produce a 10-year FMP by April 1, 2021. In order to initiate a CP, the LTMD needed to be approved for the 10-year Plan, thus the FMP was developed to the LTMD stage, then a two-year Contingency Plan was prepared to allow for appropriate time to develop the 2023-2033 WNF FMP.

The 2021-2023 WNF CP had ten amendments, and during the first year of the 2023-2033 WNF FMP, six amendments have been processed through NRIP (the Natural Resources Information Portal), following the procedure outlined in the FMPM. None of the amendments addressed Area of Concern prescriptions in the FMPs. Several AWS revisions (during the scope of this audit) are related to additions or changes to the values, i.e., new values identified. The amendment

process followed the FMPM requirements. MNR categorized and processed amendments in a timely manner.

Since the number of revisions seemed higher than normal the revision process was reviewed as an optional criterion. It was found that revisions to the AWS (within the scope of this audit) followed the FMPM process and provided the appropriate data according to the Forest Information Manual (FIM).

The plan follows the FMPM requirements for road planning and documentation. Roads within the continuous caribou distribution zone are planned to be more temporal in nature, which is consistent with the WNF caribou strategy developed for the plan. Many of the main roads have access restrictions under the *Public Lands Act*. The majority of the restrictions are to protect tourism values.

4.4 Plan Assessment and Implementation

The MNR implemented the 2011-2021 LNF FMP on the Armstrong portion of the LNF Forest and the 2021–2023 WNF CP. The MNR entered into a non-consulting service agreement with NWES to provide the forest management planning products and services for the WNF for the 2021-2022 and 2022-2023 fiscal years.

Field verification indicated that the forest description of geology, soils, sites, and forest condition is accurate. The forest unit species definitions are broad, forest units are defined by species composition and surface drainage. Local knowledge is being used to modify fisheries values. Annually, wildlife inventories are supplemented with reconnaissance of areas to be harvested to identify nest values and wildlife values found during operations or block layout.

Area of Concern Management: The forest managers implementation of the approved AOCs was conducted in compliance with all applicable laws and regulations including the CFSA and the approved forest operations prescriptions (FOPs) of the FMP and AWS. AOC prescriptions were implemented well and appear to be effective. There were no AOC violations during the audit scope.

An example of a well implemented AOC was found during the field audit. The newly constructed portion of the D'Alton Road crossed a portage trail. The forest manager identified the trail as a portage trail and that the ditch would impede efficient portaging. The ditch was subsequently cleared of debris and steps were created in the ditch to facilitate movement from one lake to the next.



Figure 5. Ditch crossing for recognized portage

Best Management Practice #1: The recognition of a portage value and subsequent shaping of the trail to facilitate portage is exemplary.

Conditions on Regular Operations (CRO): The conditions on regular operations include specified conditions on:

- biofiber harvest,
- down woody debris,
- salvage harvest,
- rutting and compaction,
- erosion,
- loss of productive land,
- nutrient loss,
- hydrological impacts,
- wildlife tree retention,
- management of roadside debris,

- maintenance of rare vegetation,
- fur bearing animal dens,
- nests,
- wetland areas,
- rich lowlands,
- woodland pools, and
- conditions for identified caribou blocks within the DCHS.

The field audit confirmed the CROs are being followed.

Forest Operations Prescriptions: Forest operations prescriptions are required to be prepared and certified by an RPF before operations commence. The MNR was the forest manager for the majority of this audit scope. The auditors examined a sample to ensure the FOP had been completed. One sampled FOP was produced by NWES and certified by MNR in 2021 on a block that was harvested in 2019 and reported in the 2019 AR. The prescription for DALT-C block was mapped and then certified as a group by the MNR Management Forester. While the mapping and certification follow the manual requirements as far as content, the FOP was prepared after operations commence.

Harvest and Slash Management: Harvest operations were generally conducted in compliance with all laws and regulations of the CFSA, approved activities of the FMP including SGRs, AWS and FOPs. No evidence of site disturbance was seen and the clearcuts were clean and available for reforestation.

Slash piling was well done and there was evidence of recent burning of these piles to ensure the area remained productive land. There is a two-year accumulation of piled debris due to a lack of contractors to perform the operation. A contractor has agreed to burn the piles this fall.

With the amalgamation and de-amalgamation of the Lake Nipigon and Armstrong forests, it is difficult to determine full or portions of annual reporting over the scope of this audit; however, it is consistent that approximately 20% of the planned area has been utilized.

Year	Actual Volume	Planned Volume	Percent of Planned Volume	Regular Area	Bridging Area	Planned Area	% of Planned Area
2023/24		471,493				5,472	
2023-2033 FMP	0	471,493	0%	0	0	5,488	0%
2022/23	54,046	559,496		849	212	5,566	
2021/22	145,605	559,496		1,138	201	5,566	
2021-2023 CP	199,651	1,118,992	18%	1,987	412	11,132	22%
2020/21*	112,068	402,426		1,329	0	3,814	

2019/20*	159,681	402,426		1,009	0	3,814	
2018/19*	269,935	402,426		1,307	0	3,814	
2017/18*	309,924	402,426		195	0	3,814	
2016/17*	101,706	402,426		0	0	3,814	
2011-2021 FMP*	953,314						

*Table 3. Planned harvest area (hectares) and volume (Cubic Meters) compared to Actual harvest area and volume. (*when WNF was part of the Lake Nipigon FMP)*

The FMPM allows for ongoing harvest of approved areas from one plan to another. These areas must be identified in the plan and harvested within a defined time. In the 2023-2033 FMP, 5,472 ha were identified for bridging. During the first year of the FMP, roughly 300 hectares of bridging area was harvested in 2023 - 2024 and it will be identified in the annual report.

There has traditionally been a low demand for hardwood from the forest. The FMP documents a utilization strategy to maximize harvest of merchantable marketable species. The strategy includes leaving unharvested pure hardwood forest types unless there is a direct market for the poplar and birch. It also includes a strategy to harvest mixed species stands with CRO-9 to allow for leaving higher than normal residual wildlife trees and avoiding high concentrations of unmarketable species. The strategies are to be discussed with the MNR prior to harvest and areas tracked for follow-up.

The FMP has been written to allow for biomass harvest. Sagatay Co-generation LP project¹¹ has federal funding to deploy a combined heat and power facility using locally sourced wood waste from the WNF to produce energy for the communities. Once constructed, the facility will reduce the use of diesel fuel for heat and electricity in Whitesand First Nation, and the communities of Armstrong and Collins, Ontario.

Site Preparation: No site preparation was done on the WNF during the audit scope. The MNR and WNM indicated that there are no local contractors and the reduced harvest did not accumulate enough area to economically bring in a contractor. This is not a concern as long as the tree planting is completed within a few years of harvest.

Renewal: The 2016 IFA found a significant area of outstanding renewal. The actions to address this finding were to quantify outstanding silviculture, treat where appropriate and complete monitoring surveys. Table 4 indicates that the outstanding renewal and monitoring has been completed for the area currently known as the WNF.

¹¹ <https://www.canada.ca/en/natural-resources-canada/news/2023/02/minister-wilkinson-announces-35-million-in-support-for-clean-air-and-good-jobs-through-new-whitesand-first-nation-energy-facility.html>

Activity	Identified Outstanding Hectares	Completed during audit scope (2016- 2024) Hectares
Free to Grow Surveys within scope	10,000	12,616
Free to grow Surveys for depletions before 2009		10,263
Renewal		
Tree planting	723	944 (2018 & 2019)
Natural		419
Site Preparation	216	0
Tending	As identified with monitoring	0

Table 4. Current Status of renewal, tending, and renewal monitoring identified in 2016 IFA.

The tree planting and natural regeneration treatments appear to be successful in regenerating the harvested sites. A good monitoring program is in place to ensure failures are identified early.

The audit field sample of renewed areas revealed that the operations are consistent with the SGRs in the applicable FMP. The plantations were well-stocked, and the natural regeneration was developing as planned.

Plan FU	Natural	Plant
PjMxl	45%	55%
ConMx	45%	55%
SbMxl	45%	55%
SbDom	45%	55%
SbLow	100%	0%
PjDom	45%	55%
HrDom	100%	0%
HrdMw	100%	0%
PoDom	100%	0%
BfMxl	42%	58%
BwDom	100%	0%
OC'Low	100%	0%
PrwMx	NA	NA

Table 5. Planned renewal by Plan FU for all sub units, 2023-2033 WNF FMP.

The 2023-2033 WNF FMP planned renewal is summarized in a table that can be used as a guide to ensure the forest units are treated as intended in the FMP.

While the SGRs do indicate seeding may be done as an alternate technique and FMP-17 indicated 500 hectares will be seeded, no seeding has been done during the audit scope. The lack of a site preparation program has limited the opportunity to use aerial seeding.

Renewal Monitoring: There are formal and informal assessments of renewal planned for developing stands. The 2023-2033 WNF FMP assessments are described in the supplemental documentation 6.1.6. Initial methods described informal field assessments for the natural regeneration at three to five years post-harvest, and informal survival assessments of planted sites one to two years post planting, followed by a regeneration assessment three to five years post planting.

Free to grow, and establishment assessments are described in detail. The methods include the use of aerial ocular assessment, large scale imagery and ground-based plots. Performance assessments will be adopted when formalized by the MNR. The assessment methodologies are described in detail and in the auditor's opinion, will provide sufficient information to measure success against the assigned SGR.

The auditor's aerial assessment of the selected sites agreed with the establishment surveys reported in the annual reports.

Evidence of Silviculture Effectiveness Monitoring (SEM) by the MNR indicated that a table of priorities was provided to the NWR for the 2016-2017 year. However, since the MNR was the manager of the forest it was not necessary for the district to monitor their own results. No SEM has been done since the forest agreement has been signed.

The results of the renewal monitoring by the forest manager were used in the development of the post-renewal succession rule set for the 2023-2033 WNF FMP. The post-renewal succession table in the 2023-2033 WNF FMP looks reasonable.

Renewal Support: Renewal support activities (tree seed collection, nursery stock production, tree improvement activities) are conducted in compliance with all laws and regulations. Seed source information was tracked by MNR and records are maintained. Current knowledge of seed supply is evident. Spruce and jack pine seed supply is sufficient for proposed activities.

Species	Seedlings required to support the Planting Program of the 10-year FMP	Volume of seed required to support the planting program of the 10-year FMP (In hectoliters)	Volume of Seed Supporting Seeding Program for 10-year FMP (In hectoliters)
Jack Pine	11,309,784	106	61
White Spruce	741,321	2	NA
Black Spruce	15,732,703	45	NA
Total	27,783,808	154	61

Table 6. Total seed and seedlings required for the 10-year FMP.

The inventory is stored at Millson Forestry Seed Plant and a spreadsheet from the fall of 2022 provided by the forest manager is summarized below.

Species	Current Seed Inventory
Jack Pine	117,241,821
Black Spruce	56,262,082

Table 7. Current seed inventory

There appears to be an abundance of good quality seed. However, there is no white spruce in the inventory. WNM indicated that they would be purchasing seed from adjacent forest, if necessary. However, since there is the intention to plant white spruce, it is advisable to collect seed as soon as possible.

An Ontario nursery grows the majority of the seedlings needed by the forest. The proximity to the forest reduces the risk that seedlings are damaged in transportation. No issues with the current planting stock were noted in the field.

Tending: There was no tending on the WNF during the audit period. Many of the field sites had productive soils with rich loamy sand that grew abundant ground vegetation and well growing regeneration. A field sample of harvest areas revealed many harvested sites where the future SGR is to a conifer dominated stand. While most sites appeared to be well on their way to be successful, there were a few areas where patches of dense hardwood regeneration were inhibiting the growth of the conifer regeneration to a degree that tending would be required for the stand to return to a conifer dominated area.

No manual tending has been done during the scope of the audit due to a lack of contractors. WNFC has indicated that the manual tending may be necessary where herbicides are not acceptable to the public. The FMP Table-17 indicates that 500 hectares will be done during plan implementation.

The 2016 IFA had 2 findings regarding addressing concerns about herbicide use. *“Thunder Bay District with the assistance of Regional Operations Division MNRF will increase their efforts to inform LCCs and Aboriginal communities about herbicide as a tool in forest management.*

“Thunder Bay District MNRF will work with Aboriginal communities to develop a tending protocol on the Armstrong portion of the Lake Nipigon Forest that will address FMP objectives.”

In response to the findings, the MNR provided information sessions and tours in 2017 with a follow-up meeting. The latest status report for the 2016 IFA indicated that, while the MNR had worked with local concerned individuals, more questions and assurance was needed to proceed to developing a tending protocol.

The 2023-2033 WNF FMP does indicate that herbicide may be used. The planned tending is noted as 3,649 hectares of aerial chemical treatment. Objective 9 in the FMP details the assessment and consultation process when an aerial herbicide application is proposed.



Figure 6. Renewed site that requires tending.

Regenerating sites on the WNF will require tending to reach established or free growing state.

Finding #3: The lack of a tending operation is reducing the success of re-establishing conifer dominated stands.

Protection: Abiotic events have not had a significant impact on the forest. Wildfire and wind events have been few and not significant during the scope of the audit.

Access Management: The field audit included sampling of road construction and decommissioning, water crossing installations, road maintenance and forestry aggregate pits. The MNR is responsible for the majority of roads on the WNF, with WNM having limited responsibility for roads on active operations.

Access on several roads is controlled by Public Lands Act signage and gates. While this appears to be an effective method to protect remote based tourism concerns, it denies access for the general public wishing to access the forest for hunting and gathering.



Figure 7. Public lands act sign on D'Alton Road.

Road construction and maintenance was typically well done with documented FOIP reports. However, a major bridge on the Collins Road did not have documented annual inspections by a qualified inspector during years of active hauling.



Figure 8. Bridge on Collins Road

Finding #4: The MNR does not have an effective bridge inspection program for bridges that are used for heavy truck hauls on an annual basis.

Road building and maintenance activities on the Collins Road area are difficult due to the large boulder material in the gravel sources, as well as the typical

areas where road building occurs. Large kilometer markers were observed at each kilometer to provide for the safety of travelers.



Figure 9. Good culvert installation

A number of water crossings were examined and they were in compliance, specifically regarding erosion control, right of way width, and culvert imbedding. A decommissioned water crossing was observed and was well done.

Aggregate pits were observed with most being on the smaller size. Many had been rehabilitated and planted. A few open aggregate pits had only small areas that were not at the angle of repose. Generally, the aggregate pits met the compliance standards.

Where winter roads are preferred where access is not required long term. These roads require no decommissioning. The winter roads observed were regenerating quickly after harvest was completed.



Figure 10. A winter road naturally regenerating with no decommissioning.

4.5 Systems Support

WNM has only a few dedicated staff in Whitesand First Nation, however this seems adequate with the current level of harvest. Local recruitment and retention are a focus. The harvesting, road construction and road maintenance are being completed by Sagatay Economic Development and Resolute Forest Products. NWES provides analysis and planning support from their Thunder Bay office. Interviews with WNM concluded that there was adequate training and education to implement the FMP.

The Thunder Bay Ignace district staff managed the forest through the implementation of the 2011- 2021 Lake Nipigon FMP. and 2021-2023 WNF CP. They are competent and professional. Two out of the eleven positions in the Forestry Management department of the Thunder Bay Ignace District MNR are vacant. Vacancies and acting employees seem to be the norm as employees change positions and retirements occur. Three of eleven staff are FOIP inspectors with another 2 being mentored.

The WNM and MNR District staff work well together.

4.6 Monitoring

Compliance Monitoring: The 2023-2033 WNF FMP contained a 10-year Compliance Plan as required by the FMPM and in accordance with the Forest Compliance Handbook¹².

The Armstrong portion of the Lake Nipigon Forest was managed by the MNR and as a result the Forest Management Planning documents served as the compliance planning and direction for the MNR. Compliance planning was complete and MNR completed Forest Operation Inspection Program reports every year of the audit period appropriate to the scale and type of activities. The MNR developed a compliance program and effectively implemented a monitoring program in accordance with MNR manuals, policies, and procedures. As the WNF is still a Crown Forest Unit the responsibility for compliance monitoring remains with the MNR.

Regeneration monitoring is up to date. A finding in the 2016 IFA was that renewal including silviculture monitoring was lacking. Through a concerted effort in 2019 and 2020 all monitoring was completed and reported in the appropriate annual reports.

4.7 Achievement of Management Objectives & Forest Sustainability

¹²

OMNR. 2014. *Forest Compliance Handbook*, Toronto. 222pp

The audit team's assessment of the achievement of the 2011-2021 LNF FMP objectives and indicators along with the 2023-2033 WNF FMP objectives that were assessed in FMP development is summarized in Appendix 2. Many of the objectives are measured and evaluated during the development of the plan and following the plan to ensure achievement. Other objectives are measured as the plan is implemented. The progress in achieving LNF FMP 2011-2021 objectives has been formally reported in the year seven and final year Annual Reports. However, the annual reports are written in two sections, the annual sections have the Armstrong area separated from Lake Nipigon. All enhanced annual reports were submitted with the required elements with Armstrong and Lake Nipigon annual operations discussed separately but the objective achievement combined.

The tables and text of the 2020/2021 enhanced annual report do include an analysis of renewal and tending activities conducted during the plan term. A discussion of the regeneration monitoring and renewal success is not clear about whether all depleted areas have received monitoring when they were due or whether the results were clear. Table AR-14 is not useful in explaining renewal success as the majority of areas assessed during the 2011- 2021 LNF plan were not from the plan period. No information was given for the area from the previous plan period. The plan text gives a statement about monitoring being generally on pace but does not offer any concrete information.

The renewal and tending discussions were brief and did not offer concrete trends. The assessment basically offered that the reduced harvest activity led to reduced silviculture activity. The discussion on silviculture expenditures implies that harvesting would need to rebound to fund necessary silviculture activities. Going forward, this is a case for carrying a fund level above the minimum buffer to cover silviculture obligations.

The annual report discussion about trends in silviculture and renewal success was more comprehensive and provided more concrete information regarding trends. The silviculture information was used to inform the 2023–2033 WNF FMP postharvest renewal forest succession table.

FMPM requirements were included in the objective tables of the 2011-2021 LNF FMP, 2021-2023 WNF CP, and 2023-2033 WNF FMP. For those objectives assessed in the final annual report, any objective not fully achieved requires an evaluation of the effect on sustainability. The evaluation was included in the final report.

The 2023-2033 WNF FMP objectives table contains some objectives that were assessed during strategic planning and others will be assessed as the plan is implemented. Some of the strategic objectives that are assessed through the development of the LTMD such as objective 2.1, 2.3, 3.1, and 5.2 have questionable outcomes.

Objective 2.1 Landscape class area (ha): Mature and Late Balsam Fir is not attained as the model outcome exceeds the range. The model used the regional succession rules which lead to a significant increase in late balsam fir which is questionable considering Bf is a minor component in the current stands. The model outputs should be questioned when they seem unreasonable.

Objective 2.3 Upland Conifer productive forest amount is not within the range and there is only slight movement towards the target in 70 years. This is a concern. Conifer purity is a feature of caribou habitat, and this forest is wholly within the continuous caribou distribution zone. There is a tending program planned but it will be a significant challenge to implement due to a number of reasons including herbicide objections from the local community and increased cost of alternative tending treatments.

Objective 3.1 Long-term harvest levels: The operational plan under allocates the planned harvest level significantly. The plan text explains that under allocation is due to the inability to access the areas or that areas are in reserves. In addition, large areas near Collins were not allocated due to local concerns.

Forest Unit	10-year AHA (ha)	10-year Planned Harvest (ha)	Difference	
			(ha)	(%)
BfMxl	117	113	4	3.3%
BwDom	1,876	1,749	127	6.8%
ConMx	10,128	10,088	40	0.4%
HrdMw	9,899	9,820	79	0.8%
HrDom	6,886	6,360	526	7.6%
OcLow	306	303	3	0.9%
SbLow	7,794	7,092	702	9.0%
PjDom	1,027	959	68	6.6%
PjMxl	3,828	3,046	782	20.4%
PoDom	3,070	3,064	6	0.2%
PrwMx				
SbDom	8,438	8,436	2	0.0%
SbMxl	3,865	3,848	17	0.4%
Total	57,234	54,878		

Table 8. Harvest allocation for the 2023-2033 WNF FMP

Objective 6.2 Planned and actual percent harvest treated by silviculture strata is a required objective as stated in the FMPM.

PART A – FOREST MANAGEMENT PLANNING PROCESS

CFSA Objective Category	Indicator(s)	Timing of Assessment
Silviculture	Percent of harvested forest area assessed as successfully established by forest unit	Year 5 management unit annual report and the management unit annual report for the final year of plan implementation (Part E, Section 3.0)
	Planned and actual percent of harvest area treated by silvicultural strata	
	Planned and actual percent of area successfully regenerated to the target forest unit by forest unit	

Table 9. Objective 6.2

This goal will demonstrate a commitment to manage stands to reach the desired future forest condition. Tables 29-31 found in the plan on page 150-151 indicate the proportion of treatments that should be used in this section to clarify the targets.

As most, if not all, assessments of renewal establishment and performance will be of stands harvested and treated in previous plans, the FMPM should require a discussion of the status of renewal from the past plans, current yield estimates used within the model in the current plan and the commitment to tend and meet the past plan targets or adjustments to current plan targets. Renewal targets need to be more explicitly stated in FMPs.

Objective 7 is not worded correctly in the objectives table. The objective states that the desired level is 100% non-compliance. The plan should be amended to read that the target is 100% compliance unless that is the goal.

Finding # 5: The objectives table contains some targets that are not clear or concise.

The first year of the 2023-2033 WNF FMP as described for 2023/24 activities are mostly on track for objective achievement. The harvest in the first year of the plan has increased significantly. The field audit witnessed an active renewal program, roads have been built and decommissioned. The WNM has been seeking out opportunities for local public and First Nation Communities.

In conclusion, the common objectives from plan to plan have remained consistent where possible. FMPM targets have been adjusted given a change in forest unit definition and objectives added for caribou habitat. The Annual Report text did provide a statement of whether the objective should change or remain the same for the next forest management plan.

The determination of sustainability for the 10-year Annual Report was documented in the enhanced annual report. Most of the 2016 IFA actions pertaining to the forest manager and local MNR have been actioned and the renewal monitoring information has informed the 2023-2033 WNF FMP inputs.

The Forest Licence holder and MNR have submitted all the required information as required by the FMPM. The year 10 AR has demonstrated that the 2011-2021 LNF FMP was followed as much as possible given the market downturn. The conclusions in the AR are reasonable.

Objective achievement documented in the 2023-2033 WNF FMP demonstrated that most objectives and indicators are projected to be maintained within the desired level, have movement towards, are overachieving (above desired levels), or have rationale for not reaching the desired levels. Overall assessments made by the audit team are consistent with the assessments made by the planning team.

Despite some findings and based on document reviews, field observations, and interviews the audit team concludes that overall forest sustainability as assessed by IFAPP is not at risk.

4.8 Contractual Obligations

The audit team concluded that Wabadowgang Noopming Forest Management Inc. is substantially in compliance with the terms and conditions of their license, legislation and their contractual agreements (Appendix 3). WNM and MNR demonstrate a thorough knowledge of the land base and stakeholders. They performed all the required surveys.

The WNF Renewal Trust Fund (FRT) is currently above the minimum balance. While Forestry Futures Trust and the stumpage fees are being paid, there are minor amounts of arrears posted in most years. FRT balance has exceeded the minimum balance and there is a good surplus.

WNM is making wood available to the Sagatay Economic Development Inc. and Resolute is harvesting in the southern portion of the forest and delivering the product to their mills on Fort William First Nation and in Thunder Bay.

The auditors witnessed conformance with policies, guides, and Acts. Plans, schedules, and reports have been completed and submitted.

The field audit did not reveal any wasteful practices. The slash is being piled at the roadside for burning. While a modified wildlife tree strategy allows for greater poplar and birch to be left unharvested on site, this strategy is not widely used.

All action plans are in place and show significant progress. The progress on actions has been submitted with the annual reports as required. Most actions are reported as completed while a few require ongoing effort.

The specified procedures review identified an insignificant invoice difference. The field audit included a robust sample of 2022/23 invoiced sites. The field audit confirmed that the areas were treated in accordance with the invoices.

A review of all of the annual Forest Renewal Charge Analysis during the audit period concluded that the analyses were reasonable, and all approved by the MNR on an annual basis.

The aerial reconnaissance confirmed the assessment of renewal success and failures. Additionally, no issues were found in the field on the ground with the assessment results.

Whitesand First Nation is the primary shareholder in WNM. WNM works well with Indigenous communities that are willing to engage on forest management and operations issues. Whitesand First Nation was actively engaged in the preparation of the FMP and annual operations are shared with local First Nations.

The forest has not had consistent active forest operations through the scope of the audit; however, applicable FOIP reporting appears to be thorough and focused on Annual Compliance Plan priorities.

4.9 Concluding Statement

There have been a few factors that have complicated the implementation of forest management during the scope of the audit. The COVID pandemic from 2019-2022, the complication of MNR managing the Crown Forest portion of the 2011-2021 LNF FMP and the lack of a forest product market are three of the more notable elements.

The COVID pandemic MNR protocols restricted travel into the field, limited training opportunities and disrupted projects. Many seasoned professionals chose to retire during this tumultuous time.

The forest products markets have not been stable. The 2006 closure of hardwood processing facilities in the area has led to an under-utilization of hardwood.

The Forest manager Wabadowgang Noopming Forest Management Inc. and the MNR work well together. They are focused on common goals and listen to the input of stakeholders and Indigenous Peoples.

Overall, the audit team concludes that the management of the Wabadowgang Noopming Forest was generally in compliance with the legislation, regulations, and policies that were in effect during the period covered by the audit, and the Crown Forest was managed in compliance with the terms and conditions of the Crown Forest Sustainability Act and the forest resource licence held by Wabadowgang Noopming Forest Management Inc. The forest is being managed consistent with the principles of sustainable forest management, as assessed through the IFAPP.

Appendix 1

Findings and Best Practices

Independent Forest Audit – Record of Finding

Finding # 1

Principle 2: Consultation

Audit Criterion 2.1.1: Local Citizens Committee (LCC)

Procedure(s): The CFSA requires the establishment of the LCC as a standing committee. The LCC is to represent a range and balance of interests from communities that are in or adjacent to the management unit with members appointed by the MNR District Manager. Review the applicable FMPM related to LCC purpose, membership, organization, and terms of reference.

Background Information and Summary of Evidence:

The terms of reference of the ALCC, the meeting minutes, the discussion of agreement with the FMP and interviews with the ALCC were considered.

Discussion and Conclusion:

The ALCC is a standing committee appointed by the Thunder Bay Ignace District Manager. They have current terms of reference that are reviewed annually. The terms of reference have a stated purpose of the ALCC. The LCC has a membership list that includes members representing naturalists, tourism, local economic development, Indigenous communities, trappers, hunters, anglers, mining, crown recreation, local business, and the forest industry. It is commendable that the committee has a youth representative as a member. The ALCC meets at least twice per year.

The ALCC is a 16-member committee. At time of writing the plan there were 2 vacancies. A review of the committee comments and discussion through the plan indicated that the committee is not balanced, and the number of comments disproportionately favor forest preservation, park expansion, and larger reserves. Only six of the 14 members were local citizens.

There is good attendance at most meetings. The ALCC representatives were active participants at planning team meetings. The statement from the ALCC on the WNF FMP reflects that they are split on the agreement with the FMP. Six did not agree with the FMP and six agreed with the FMP. It is unusual to have such disagreement with the FMP when the LCC is actively involved. Their concerns ranged from the interpretation of CLUPA direction, the assurance of ecosystem renewal, the use of herbicides, the application of the Boreal Landscape Guide fine filtered direction, and the season of harvest in some designated areas of tourism concerns.

The ALCC members interviewed indicated that the issue resolution process with the

Regional Director was followed and was effective in providing direction to move forward. Amendments, annual reports, and annual work schedules are presented to the ALCC. They have formed a subcommittee to efficiently recommend amendment classification to the District Manager.

A review of the committee's comments and discussion through the plan indicated that the committee is not balanced. The number of comments disproportionately favours forest preservation, park expansion, and larger reserves. Six of the 14 members were local citizens. The auditors suggest that any vacancies be filled with individuals who represent local community interests.

Finding #1: The Armstrong Local Citizens Committee does not represent a balance of interests.
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Independent Forest Audit – Record of Finding

Finding # 2

Principle 3: Forest Management Planning

Audit Criterion 3.5.12: Results of Audits

Procedure(s):

Review the FMP to assess whether:

- recommendations or findings made in the last IFA have been addressed in development of the current plan where appropriate (2004 FMPM);
- where recommendations or findings have not been addressed determine whether a reasonable explanation has been documented (2004 FMPM);
- where the last IFA was conducted after development of the current plan determine whether any recommendations or findings relevant to production of AWSs subsequent to the audit have been addressed in those AWSs (2004 FMPM); or
- recommendations or findings made in the last IFA, as considered in the assessment of objective achievement and determination of sustainability in the previous year five and/or final year annual reports, have been considered in the development of the risk assessment for the proposed LTMD (2017 and 2020 FMPM).

Background Information and Summary of Evidence:

FMP Text Sect 3.11 Consideration of Annual Reports and Audit Recommendations

- 4 recommendations in the 2011 IFA were considered in the FMP
- 0 recommendations in the 2016 IFA were required to be considered in the FMP objective achievement, determining sustainability, or the risk assessment of the proposed LTMD.

2016 IFA Recommendation

#3: Thunder Bay District with the assistance of Regional Operations Division MNRF will increase their efforts to inform LCCs and Aboriginal communities about herbicide as a tool in forest management.

Action Plan: MNRF District and R.O.D. to develop an agreed upon approach to educate LCCs and Aboriginal communities on the use of herbicides and present them to them.

#4: Thunder Bay District MNRF will work with aboriginal communities to develop a tending protocol on the Armstrong portion of the Lake Nipigon Forest that will address FMP objectives and community concerns.

Action Plan: develop a protocol with Aboriginal communities regarding the use of herbicides and how MNRF and/or SFL holder, will work with each individual community in selecting appropriate stands to receive herbicides with the goal of protecting aboriginal community values.

Discussion and Conclusion:

The MNRF District and Regional Operations Division have provided field tours and expert speakers related to herbicides, however, First Nations and Métis continue to desire a moratorium on the use of herbicides. In addition, the ALCC' has cited herbicide application as a concern. This brings into question the effectiveness of the effort to provide information and tours.

The tending protocol that was to be developed to address the concerns about the tending program was not developed and is not followed in the Wabadowgang Noopming Forest. However, it is recognized that an objective was included in the objectives table to engage with Whitesand First Nation (and First Nations and Metis communities) on careful site selection, planning and clear mapping of conifer renewal areas that may receive aerial tending (herbicide) treatments during plan development, annual operations planning and implementation.

Action plans as a result of an IFA finding need to be implemented to complete the continuous improvement cycle. Intent to complete action plans should be evident in the status reports.

Finding #2: A tending protocol was not developed as identified as an action to address a 2016 Independent Forest Audit finding.

Independent Forest Audit – Record of Finding

Finding # 3

Principle 4: Plan Assessment and Implementation

Audit Criterion 4.5: Tending and Protection

Procedure(s):

Review and assess in the field the implementation of approved tending and protection operations. Include the following:

- assess whether the tending and protection treatments were consistent with the FOP;
- the FOP was consistent with the SGRs;

the FOP certified by an R.P.F. or other qualified individual, and actual operations were appropriate and effective for the actual site conditions encountered.

Background Information and Summary of Evidence:

There was no tending on the Wabadowgang Noopming Forest during the audit period. Many of the field sites had productive soils with rich loamy sand that grew abundant ground vegetation and well growing regeneration. A field sample of harvest areas revealed many harvested sites where the future SGR is to a conifer dominated stand. While most sites appeared to be well on their way to be successful, there were a few areas where patches of dense hardwood regeneration were inhibiting the growth of the conifer regeneration to a degree that tending would be required for the stand to return to a conifer dominated area.

The planning team agreed that tending will not be used to convert hardwood stands to conifer stands. The goal of the agreement was to concentrate silviculture effort where it is likely to be most effective. However, due to the mixed nature of stands within blocks, this will limit the ability to use tending to maintain conifer dominant stands.

In interviews with auditors, WNM mentioned an herbicide alternative project that began a few years ago in collaboration with MNR, Whitesand First Nations and NWES. WNM is continuing this project and was recently successful in getting additional funding from the Ministry of the Environment, Conservation, and Parks. This is an important project as simply not using herbicide (by air) and implementing other forms of tending will greatly impact renewal rates on the WNF.¹³ This involved the development of a community-driven, cost-effective silviculture program framework using herbicide alternatives and economic opportunities in forestry operations. MNR region and district participation in this project has been limited and additional support would be well received.

Discussion with the forest manager confirmed that ongoing discussions were needed to identify areas where herbicide application would be acceptable. Herbicide is not the only tool to tend conifer plantations and an herbicide application does not need to be applied from an aircraft. An overall strategy for tending or reducing the need for tending is needed

¹³ <https://www.giiwedineenv.ca/projects>

to ensure that the objectives in the forest management plan regarding caribou habitat can be realized.

Discussion and Conclusion:

While there is a recognition of the importance of a tending program. The WNF does not have an effective tending program which is necessary to ensure silvicultural success in conifer dominated stands where hardwood competition is present.

Finding #3: The lack of a tending operation is reducing the success of re-establishing conifer dominated stands
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Independent Forest Audit – Record of Finding

Finding # 4

Principle 4: Field Verification

Audit Criterion 4.7: Access

Procedure:

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

assess whether the planned monitoring program for roads and water crossings was implemented as planned and whether it was effective in determining any environmental or public safety concerns.

Background Information and Summary of Evidence:

Evidence was gathered through field sampling and a review of the documentation of approved FMPs, AWS and AR, as well as FOIP reports of access activities which included road construction, water crossing installation, and forestry aggregate pits.

The roads, crossings and aggregate pits were in compliance. However, there was one exception. Bridge THU-5041 was sampled on Collins Road. Overall, the bridge was in good shape with appropriate safety signage. The last inspection was completed in Sept. 2019. According to Section 8.7.4 Roads and Water Crossings of the 2011 LNF Phase II FMP, Bridges used for 'heavy truck hauls' will be inspected by a qualified inspector at least once per year. The 2023-2033 WNF FMP states while the road/road network is in use for forest management purposes (e.g. harvest, Bridges used for 'heavy truck hauls' will be inspected at least once a year by a competent person (following the inspection guidelines in Appendix E of the Crown Land Bridge Management Guidelines or by a professional engineer).

This bridge did not have an up-to-date inspection.

Discussion and Conclusion:

Road construction and maintenance was well done with documented FOIP reports. However, a major bridge on the Collins Road did not have documented annual inspections by a qualified inspector during years of active hauling.

Finding #4: The MNR does not have an effective bridge inspection program for bridges that are used for heavy truck hauls.
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Independent Forest Audit – Record of Finding

Finding # 5

Principle 6: Monitoring

Audit Criterion 6.4: Monitoring Indicators of Sustainability

Procedure:

1. Assess whether programs are in place and are being implemented to provide sufficient data for all indicators identified in the FMP.

Objective 7.1, 7.2, 7.3 Regarding Compliance goals to protect values.

Discussion and Conclusion:

Objective 6.2 Planned and actual percent harvest treated by silviculture strata is a new required objective as stated in the FMPM.

This goal will demonstrate a commitment to manage stands to reach the desired future forest condition. Tables 29-31 found in the plan on page 150-151 indicate the proportion of treatments that should be used in this section to clarify the targets. The current target in the objectives table points to renewal to the SGR and not the treatment by silviculture strata.

As most, if not all, assessments of renewal establishment and performance will be of stands harvested and treated in previous plans, the FMPM should require a discussion of the status of renewal from the past plans, current yield estimates used within the model in the current plan and the commitment to tend and meet the past plan targets or adjustments to current plan targets. While this addition to the requirements in the FMPM is a step toward solidifying the plan commitment to clear measurable targets of strata treatment it is not applied correctly in the table.

In addition, the objectives table does not have correct targets for values protection.

7.1 Compliance with management practices (% of inspections in non-compliance, by activity and remedy type).

7.2 Compliance with management practices that prevent, minimize or mitigate site damage (% of inspections in non-compliance by remedy type).

7.3 Compliance with management practices that protect water quality and fish habitat (% of inspections in non-compliance by remedy type).

All of these objectives have a desired level of 100% with a target of 95%. The auditors believe this to be in error. It should be reworded from “in non-compliance” to “in compliance”. That is the desired level would be 100% of inspections in compliance and the target level would be 95%.

Finding #5: The objectives table contains some targets that are not clear or concise.

Independent Forest Audit – Record of Finding

Best Management Practice # 1

Principle 4:

Audit Criterion 4.2: Area of Concern

Procedure: Review and assess in the field the implementation of approved AOC operational prescriptions.

- an assessment of the effectiveness of the AOC prescription in protecting the identified value(s).

Background Information and Summary of Evidence:

The newly constructed portion of the Dalton Road crossed a portage trail. The forest manager identified the trail as a portage trail and that the ditch would impede efficient portaging. The ditch was subsequently cleared of debris and steps were created in the ditch to facilitate movement from one lake to the next.

Best Management Practice 1: The recognition of a portage value and subsequent shaping of the trail to facilitate portage is exemplary.

Independent Forest Audit – Concluding Statement

There have been a few factors that have complicated the implementation of forest management during the scope of the audit. The COVID pandemic protocols restricted travel into the field, limited training opportunities and disrupted projects. Many seasoned professionals chose to retire during this tumultuous time. Prior to 2021, the Lake Nipigon Forest was managed as a split responsibility with management of the Armstrong portion by the MNR as a Crown unit and the Lake Nipigon portion was managed by the Lake Nipigon Forest Management. This led to a complicated reporting and planning arrangement. And finally, while the harvesting has increased recently it is still well below the forest's potential.

The MNR district staff worked diligently to address most findings from the past independent forest audit and obligations around forest renewal and monitoring are completed. The MNR and Wabadowgang Noopming Forest Management Inc. work well together. They are focused on common goals and generally understand the social dynamics of the forest.

The audit team concludes that the management of the Wabadowgang Noopming Forest was generally in compliance with the legislation, regulations and policies that were in effect during the period covered by the audit, and the Forest was managed in compliance with the terms and conditions of the Forest Resource Licence held by Wabadowgang Noopming Forest Management Inc. The forest is being managed consistent with the principles of sustainable forest management, as assessed through the Independent Forest Audit Process and Protocol.

Appendix 2
Management Objectives Table
Management Objective/Assessment
 2011-2021 Lake Nipigon Forest Management Plan

	Auditors Assessment	Auditor Comments
1.1 Landscape Pattern: Percent frequency distribution of forest distribution by size class	Not Achieved	Movement towards the desired landscape pattern was not achieved. While the planned harvest would have moved towards the desired level there was greatly reduced harvest during plan implementation. This is not a sustainability concern.
2.1 Woodland Caribou: Percent of caribou on-line habitat (available and suitable) within the caribou mosaic	Achieved	The 40% on-line caribou available and suitable habitat was the desired level, and it was exceeded for all terms.
2.2 Woodland Caribou: Woodland Caribou Habitat area- winter habitat (used and preferred) and Refuge habitat within the caribou continuous distribution range	Achieved	The desired level was exceeded for all terms.
2.3 Marten Habitat: Percent of suitable marten habitat arranged in core areas in Crown productive forest outside of the caribou mosaic.	Achieved	The desired level was exceeded for all terms.
2.4 Marten Habitat: Percent of suitable marten habitat arranged in core areas in Total Crown Productive Forest.	Achieved	The desired level was exceeded for all terms.
2.5 Habitat for forest dependent provincially and locally featured species in Ontario	Achieved	The desired level was exceeded for all terms.
2.6 Area of habitat for forest dependent species at risk in Ontario		To be considered in future FMPs
3.1 Total Area of Crown Productive Forest by forest unit	Partially Achieved	The desired level is met in 6 out of 10 forest units. The lack of harvest limited the plans' influence on this objective. This is not a sustainability concern.

	Auditors Assessment	Auditor Comments
3.2 Total Area of Crown Productive young forest by forest unit	Partially Achieved	The desired levels and target levels were maintained for all but the OCL forest unit which only fell short by 40 ha. This is not a concern.
3.3 Total Area of Crown Productive mature forest by forest unit	Partially Achieved	The desired and target levels were maintained for 7/10 of the forest units. This is not a concern.
3.4 Total Area of Crown Productive old growth forest by forest unit	Achieved	The desired level was within the natural benchmark for all terms.
4.1 Total Area of Crown Productive Forest by Landscape Class.	Not achieved	Of the seven landscape classes only one parameter was within the range, while 1 moved towards the range and the others moved slightly away from the modeled natural ranges. The lack of harvest in the forest affected the attainment of the immature targets. The new eFRI interpretation and forest unit classification changes affected the attainment of this target. Since huge swings were not seen, this is not a concern.
5.1 Long-term projected available harvest area (SFFM) by forest unit.	Partially Achieved	This was assessed at LTMD development. The target did not allow for any deviation (like 90% of current level). Most of the forest unit groupings were not attained, but none were substantially lower than target. From the auditor's perspective, this is not a sustainability concern.
5.2 Long term projected available harvest by species groups	Partially Achieved	This was assessed at LTMD development. The target did not allow for any deviation (like 90% of current level). Most of the species' classes were not attained, but none were substantially lower than target. From the auditor's perspective, this is not a concern.

	Auditors Assessment	Auditor Comments
5.3 Forecast available harvest by forest unit	Achieved	The harvest area was fully allocated in the plan but not harvested. This was carried forward into the next plan.
5.4 Forecast available harvest volume by species group	Achieved	The harvest area was fully allocated in the plan but not harvested. This was carried forward into the next plan.
5.5 Actual harvest area by forest unit	Not achieved	The total projected harvest at plan start was 9,828 hectares per year compared to the actual harvest of 2,485 hectares per year. As this harvest will be carried forward to the next plan this is not a concern except the forest is not reaching its economic potential.
5.6 Actual harvest volume by species group.	Not achieved	The total projected harvest at plan start was 1,034,034 m3 per year compared to the actual harvest of 251,541 m3 per year. As this harvest will be carried forward to the next plan this is not a concern except the forest is not reaching its economic potential.
5.7 Percent of forecast volume utilized by the mill.	Not achieved	Several of the projected receiving mills did not get built or closed. Several mills had 0% utilization. This is an economic concern for the area but it does not affect the short-term sustainability of the forest.
6.1 Percent of treated forest area assessed as free-growing and successfully regenerated.	Achieved	The target of 95% successful regeneration was achieved.
6.2 Percent of treated forest area successfully regenerated to the projected forest unit and assessed as free growing	Not achieved	The target of 80% successful regeneration to the projected forest unit was not achieved (78%). More time was needed to reach the projected forest units. This slight deviation is not a concern.

	Auditors Assessment	Auditor Comments
6.3 Planned and actual percent of harvested area treated by silviculture intensity.	Not achieved	Only 74% of the planned area was treated due to a lack of harvesting. While the level of silviculture was not as planned the forest units were not harvested as planned. The silviculture appeared to match the strategy.
6.4 To maintain or increase conifer species composition levels of Crown managed forest within the caribou continuous distribution range.	Not assessed	It was deemed not possible to assess this objective as the 2021 forest did not differentiate between the continuous and discontinuous ranges and the forest units were redefined. It is important to set objectives that can be assessed and describe the method of assessment at plan start.
6.5 To maintain or increase conifer species composition levels of Crown managed forest within the caribou discontinuous distribution range.	Not assessed	It was deemed not possible to assess this objective as the 2021 forest did not differentiate between the continuous and discontinuous ranges and the forest units were redefined. It is important to set objectives that can be assessed and describe the method of assessment at plan start.
7.1 Managed Crown productive forest available for timber production	Achieved	The new inventory changed the classification of some forest areas from unproductive to productive.
8.1 Percent of annual forest operations inspections in compliance with prescriptions developed for the protection of water quality and fish habitat and the prevention, maintenance, or mitigation of site damage.	Achieved	93% of operations have been in compliance with the prescriptions and another 3% that had issues were resolved through corrective actions
8.2 Percent of annual forest operations inspections in compliance with AOC prescriptions developed for the protection of resource-based tourism values.	Achieved	There were 2 non-compliances issued which would potentially affect a canoe route AOC. A 99.2% compliance was

	Auditors Assessment	Auditor Comments
		achieved against a target of 90%
8.3 Percent of annual forest operations inspections in compliance with prescriptions developed for the protection of known cultural heritage values.	Achieved	No non-compliances reported.
8.4 Percent of annual forest operations inspections in compliance with prescriptions developed for the protection of archeological potential area culture heritage values which have been identified and mapped.	Achieved	No non-compliances reported.
9.1 Woodland Caribou Kilometers of SFL-responsible forest access roads per square kilometer of Crown managed forest within the caribou continuous range.	Partially Achieved	0.483 km/km ² was measured against a target of less than 0.3479 km/km ² . The operational roads that were rehabilitated were not removed from the inventory but an amendment was in the process to correct the road layer used for calculation. This is not a concern however the measured objective should have defined how many roads were being removed in the amendment. Also, 0.105 km/km ² of primary and branch roads per km ² of forest which was less than the 0.1054 km/km ² at plan start.
9.2 Woodland Caribou Kilometers of SFL-responsible forest access roads per square kilometer of Crown managed forest within the caribou discontinuous range.	Partially Achieved	Again, the operational density exceeded the target, however the amendment to the roads layer would correct this and the primary and branch roads were reduced.
10.1 Provide Aboriginal communities with opportunities for involvement in the development of the forest management plan.	Achieved	Achieved during plan development.
10.2 Provide Aboriginal communities with employment opportunities in the forest industry.	Achieved	Four Nations Forestry, a silviculture company, was formed and did a significant

	Auditors Assessment	Auditor Comments
		amount of the tree planting, manual brushing, and bridge maintenance on the forest. Sagatay Development had a FRL on the Armstrong portion of the forest.
11.1 Provide opportunities to eligible resource-based tourism in plan development	Achieved	Achieved during plan development.
12.1 Opportunities for involvement provided to the general public and local stakeholders in plan development	Achieved	Achieved during plan development.
12.2 Provide local employment opportunities in the forest industry	Achieved	Achieved more recently as the activity on the forest has increased.
13.1 Local citizens committee members self-evaluation of their effectiveness in plan development	Achieved	The LCC self-evaluation revealed 82% satisfaction with the involvement in plan development.

**2023-2033 Wabadowgang Noopming Forest Management Plan
FMP Objectives and Assessment from table FMP-10**

	Auditors Assessment	Auditors comment
1. Forest Diversity and provision of forest cover		
1.1.1 Caribou Refuge Winter (combined) Habitat Area (ha)	Achieved	The amount of refuge habitat is maintained in the short, mid-, and long-term.
1.1.2 Amount of caribou winter habitat on the WNF.	Achieved	The area of suitable caribou winter habitat at plan start was within the desirable range and it was maintained for most of the evaluated terms. An identified age class gap between 40-80 was the cause of the slight dip below desired levels.
1.2 Texture of Caribou Winter habitat (used and preferred combined) hexagon frequency distribution by mean proportion): 6,000 ha and 30,000 Hexagon Scale	Achieved	Most indicators move towards the desired level. The harvest of the current DCHS will improve the desired texture over time. This is not a concern.

	Auditors Assessment	Auditors comment
1.3 Texture and arrangement of Caribou Winter Habitat (hexagon frequency distribution by mean proportion): 6,000 ha/30,000 ha Hexagon Scale	Partially Achieved	The plan implementation will move texture towards targets although slightly. This is not a concern.
1.4 Online Caribou DCHS (% of DCHS area with average age of block >60 years old).	Achieved	The current level is high due to minimal disturbance on the unit. The desirable levels are met in the short, medium, and long term.
2. Forest Diversity		
2.1.1 Landscape Class Area (ha): Mature and Late balsam fir	Not Achieved	The natural succession in the model projects more balsam fir in the future which makes the target not attainable. The model outputs should be validated.
2.1.2 Landscape Class Area (ha): Mature and late lowland conifer	Not Achieved	The DCHS limits the ability to influence the harvest of this type. Areas are either not in open DCHS or are in protection forest. This is not a concern.
2.1.3 Landscape Class Area (ha): Mature and late conifer	Achieved	Good achievement.
2.1.4 Landscape Class Area (ha): Mature and late hardwood	Not Achieved	The plan start level is significantly above the desired level but moves toward it with plan implementation. This is not a concern.
2.2.1 Amount of Distribution Old Growth Forest Area: Lowland Conifer	Achieved	The level of old growth conifer is within the desired level at the start of the plan and moves above desired level in the long term. Lowland conifer is maintained in reserves and is dependent on the DCHS for harvest schedule.
2.2.2 Amount of Distribution Old Growth Forest Area: Area of mature and older upland conifer	Achieved	The plan start level is below, but the model shows some movement towards in some terms. This indicator is determined by the DCHS.
2.2.3 Amount of Distribution Old Growth Forest Area: Mixedwood and pure Hardwood	Achieved	The plan start level is above, but the model shows some movement towards in some

	Auditors Assessment	Auditors comment
		terms. This indicator is determined by the DCHS.
2.3 Upland Conifer Crown productive forest (ha)	Not Achieved Finding 2	The range is not achieved and only has a slight movement towards the range in 70 years. This is a concern. Conifer purity is a feature of caribou habitat, and this forest is wholly within the continuous Caribou distribution area. Tending is uncertain.
2.4 Young Forest Area (ha): All stands < 36 years	Achieved	Amount is within the range or above in all terms. This is not a concern.
2.5 Red pine and white pine forest unit area (all ages): maintain PrwMx	Achieved	Red and white pine will not be harvested during the plan term, and they are expected to succeed to themselves.
2.6 Texture of mature and old forest (hexagon frequency distribution by mean proportion) 500 ha/ 5000 ha Hexagon Scale	Not Achieved	This was measured for plan implementation period only and most of the concentrations moved away from the targets. Due to the implementation of the DCHS there is limited influence from the plan implementation. This is not a concern.
2.7 Young Forest patch size: (frequency by size class ha)	Not Achieved	This was measured for plan implementation period only and most of the concentrations moved away from the targets. Due to the implementation of the DCHS there is limited influence from the plan implementation. This is not a concern.
3. Social and Economic Long-term Harvest Levels		
3.1 Long-term projected available harvest area – Forest units combined	Not Achieved	The target was to fully allocate 5,541 ha per year out of the 5,723.5-ha available. FMP- 12 indicates that 5,487.8 ha per year was allocated. This falls slightly short of the target by 2,357 ha. over the term of the plan. The most under-allocated

	Auditors Assessment	Auditors comment
		forest units were PjMx1 Sblow and HrDom. The under allocation is explained in the analysis package.
3.2 Long-term projected available volume by species groups	Not achieved	The DCHS does dictate the harvest areas. The long-term wood supply never satisfies the desired level and only ever attains 84% of the desired target. At least 5% more could have been gained by fully allocating harvest area for the plan. It is recognized that constraints are placed on the allocations after LTMD. Target could have been changed to recognize constraints. This is not a concern.
3.3 Long-term projected available volume by size class	Not Achieved	The DCHS does dictate the harvest areas. The long-term wood supply never satisfies the desired level and only ever attains 84% of the desired target. At least 5% more could have been gained by fully allocating harvest area for the plan. It is recognized that constraints are placed on the allocations after LTMD. Target could have been changed to recognize constraints. The balance of small and large size classes is about proportional to target. This is not a concern.
4. Social and Economic Planned Harvest Levels		
4.1 Actual harvest area by forest unit (% of planned harvest area)		To be measured through enhanced annual reports.
4.1 Actual harvest volume by forest unit (% of planned harvest volume)		To be measured through enhanced annual reports.
5. Social and Economic Community Well-Being		

	Auditors Assessment	Auditors comment
5.1 Managed Crown productive forest Available for timber production (ha)		417,801 ha at plan start. To be measured through enhanced annual reports.
5.2 Density of roads used for forest management purposes per square kilometer of Crown Forest.		0.08 km drivable primary and branch roads per km ² crown productive forest. To be assessed in enhanced annual reports.
6. Silviculture		
6.1 Percent of forest area assessed as successfully established.		A target of 100% of eligible areas assessed to be reported in enhanced annual reports.
6.2 Planned and actual percent of harvested area treated by silviculture strata.		A target of 85% treated to strata will be assessed in enhanced annual reports. Page 119 does not describe how this indicator will be measured in enhanced annual reports. The plan does contain a table of treatment by silviculture strata see table 2.
6.3 Planned and actual % of area successfully regenerated to the target forest unit by forest unit.		This will be assessed in the enhanced annual reports. The objectives table FMP-10 references FMP-5 which is very confusing as this is the transition pathways used in the model and the desirable level references the performance survey. The FMPM is not clear on the measurement of this indicator.
6.4 Conifer Purity		This target will not maintain conifer on the landscape. Any stand with less conifer will simply drop out of the forest unit. This objective is to be measured at year 5 and plan end, however, how it will be measured is not discussed. Any management within the plan will not be reflected in an inventory summary as most will not be assessed as established within the plan timeframe.

	Auditors Assessment	Auditors comment
7. Ecological Sustainability: Healthy Forest Ecosystems		
7.1 Compliance with management practices (% of inspections in non-compliance, by activity and remedy type).	Finding 6	The target is set incorrectly. The target should be 0% noncompliance or 100% in compliance. To be measured at year 5 and plan end
7.2 Compliance with management practices that prevent, minimize or mitigate site damage (% of inspections in non-compliance by remedy type).	Finding 6	The target is set incorrectly. The target should be 0% noncompliance or 100% in compliance. To be measured at year 5 and plan end.
7.3 Compliance with management practices that protect water quality and fish habitat (% of inspections in non-compliance by remedy type).	Finding 6	The target is set incorrectly. The target should be 0% noncompliance or 100% in compliance. To be measured at year 5 and plan end
8. Social and Economics: First Nations Involvement		
8.1 Opportunities for involvement of First Nation and Métis communities in plan development	Achieved	Opportunities were provided and the process was followed. The planning team had representation from Whitesand First Nation, Red Sky Métis Independent Nation, Namaygoosisagagun First Nation, Métis Nation of Ontario (Region 2). Gull Bay First Nation received notification as requested.
8.2 Local Citizens Committee self-evaluation of its effectiveness in plan development	Achieved	Desired level for surveys received was 75% and 85% was achieved. While only 50% of the ALCC supported the FMP. Satisfaction was rated as agreement with the model output.
8.3 Trappers Involvement	Achieved	100% of trappers were contacted and concerns were appropriately documented and accommodated.
8.4 Tourism Involvement	Achieved	100% of tourism were contacted and concerns were

	Auditors Assessment	Auditors comment
		appropriately documented and accommodated. There was a strong contingent of tourist interests represented on the planning team.
8.5 Completion of harvest and renewal activities in the westerly portion of the Rock Road within 5 years of commencement		This is an objective provided by the Regional Director to address an issue resolution. This will be assessed 5 years after the Rocky Road block is commenced.
9. Social and Economics: To Improve the responsible usage of herbicide on the forest		
9.1 Engagement with First Nations and Métis communities within and adjacent to the WNF on careful site selection, planning and clear mapping of treatment areas, during the development phase of the FMP	Achieved	Opportunities were communicated and the process was followed.
9.2 Engagement with First Nations and Métis communities within and adjacent to the WNF on careful site selection, planning and clear mapping of treatment areas, during the development phase of the AWS		To be measured at year 5 and plan end.
9.3 Careful site selection, planning and clear mapping of conifer renewal areas that may receive aerial tending (herbicide) treatments during plan implementation, through tending assessments and an iterative dialogue with Whitesand First Nation (and First Nations and Metis communities)		To be measured at year 5 and plan end.

Appendix 3

Compliance with Contractual Obligations

Licence Condition	Licence Holder Performance
Payment of Forestry Futures and Ontario Crown charges	All Forestry Futures Trust charges and Ontario Crown charges are being paid. However, there are minor arrears posted in most years.
Wood supply commitments, memorandum of agreement (MOAs), sharing arrangements, special conditions	There are no wood supply commitments on the Wabadowgang Noopming Forest. Wabadowgang Noopming Forest Management Inc. has signed an MOA with Resolute FP Canada Inc. for access to a portion of the wood supply. There are little to no markets for hardwood on the forest, however Whitesand First Nation is pursuing a business opportunity to utilize a portion of the available hardwood. Sagatay Economic Development has a wood supply agreement for hardwood.
Preparation of FMP, AWS and reports; abiding by the FMP and all other requirements of the FMPM and CFSA	The MNR and WNM prepared all required plans and reports to the required standards.
Conduct inventories, surveys, tests and studies; provision and collection of information in accordance with the FIM.	The MNR and WNM conducted the required surveys and submitted all the data consistent with FIM requirements.
Wasteful practices not to be committed	Review of FOIP reports and 2 days of field auditing. The current FMP has a Utilization Strategy to address the unmarketable species in the forest. There are limited markets for aspen and birch. There was no evidence found of wasteful practices.
Natural disturbance and salvage SFL conditions must be followed	There has been very little natural disturbance in the forest. Some wind damage was mentioned but it was hard to map and not concentrated enough for salvage.
Protection of the licence area from pest damage, participation in pest control programs	Limited pest disturbance is present in the forest. A pest management plan is not required.
Withdrawals from licence area	The de-amalgamation of the forest did not result in a significant change to the unit boundary.

Licence Condition	Licence Holder Performance
Action plan and progress towards the completion of actions as reported in annual reports or status reports prepared under previous versions of the IFAPP	An action plan was prepared by MNR for findings regarding their responsibilities. The actions were reported as required and the actions were observed to be implemented by the audit team.
Payment of forest renewal charges to the FRT	All Forest Renewal Charges are current.
FRT eligible silviculture work	Field audit verified that payments from the FRT were for eligible silviculture work in accordance with planned specifications and funding eligibility requirements.
FRT forest renewal charge analysis	The FRT charge analysis was completed to specifications on an annual basis.
FRT account minimum balance	There is no requirement to have a Crown unit above a minimum balance. The requirements to assess and set renewal rate each year was completed.
Silviculture standards and assessment program	The assessment of free-to-grow (FTG) was a finding at the last audit in 2016. During the scope of this audit, the MNR completed all assessments and it is now current with operations. (10 years post- harvest)
First Nations and Métis opportunities	First Nations were actively engaged in the preparation of the FMP and annual operations were shared with local First Nations. Whitesand First Nation is the primary shareholder of the WNM. Harvest, road building and silviculture operations are either owned or employed by First Nation. More opportunities are being planned for a biofibre energy plant
Preparation of compliance plan	The compliance plans have been completed annually and the FMP included a detailed compliance strategy for the 2023-2033 FMP.
Internal compliance prevention/education program	The FMP has a detailed compliance program which includes a continual improvement.
Compliance inspections and reporting; compliance with compliance plan	Compliance inspections and reporting have been done on most activities.
SFL forestry operations on mining claims	There are few mining claims on the forest. No conflict was noted.

Appendix 4

Audit Process

The Crown Forest Sustainability Act, through Ontario Regulation 319/20, requires that each management unit in Ontario be audited at least once every ten to twelve years. The audits are conducted by independent audit firms selected through a competitive bidding process. Both the Forest manager and the MNR are audited. The Independent Forest Audit Process and Protocol provides guidance in meeting the requirements of Ontario Regulation 319/20 made under the CFSA.

The IFA consisted of the following elements:

Risk Assessment: A risk assessment was completed in June 2024 to determine which IFAPP optional procedures would be audited. The Risk assessment report was submitted to the Forestry Futures Trust and MNR Divisional Support Branch for review and approval.

Principle	Optional-Applicable	Optional Selected	Optional - % Audited	Mandatory – Audited #	Comments / IFAPP Procedure #
1.0 Commitment	2	2	100%	2	WNM and MNR were audited
2. LCC Involvement and Issue Resolution	5	2	40%	2	2.1.1, 2.3
3. Forest management planning	16	5	31%	20	3.1.2, 3.3.2, 3.3.3, 3.5.7, 3.5.11
4. Plan assessment and implementation	2	0	0%	7	
5. System support	2	2	100%	2	WNM and MNR were audited
6. Monitoring	5	2	40%	9	6.1, 6.2.1,
7. Achievement of management objectives and forest sustainability	0	0	0	5	

8. Contractual obligations	5	3	60%	15	8.1.16, 8.1.17, 8.1.19
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Audit Plan: An audit plan describing the objectives to be audited, the schedule of audit activities, audit team members, audit participants and the auditing methods was prepared and submitted to WNM, MNR Thunder Bay Ignace District, MNR Northwest Region Office, the MNR Divisional Support Branch, the Forestry Futures Trust Committee and the ALCC in May 2024. The audit plan was presented to the auditees and Forestry Futures Committee.

Public Notices: Public input was solicited through print notices – The Chronicle Journal (Thunder Bay). No public comments were received.

All Indigenous communities with an interest in the WNF were contacted by mail and invited to participate or provide input in the audit. In May, the lead auditor provided a presentation to the ALCC announcing the audit and process. The committee was also given a presentation by the MNR prior to the field audit. Two LCC members were involved in the field audit and were interviewed. The LCC gave feedback on the forest management planning and operations process, the communication with the auditees and their perceived impact. The LCC will also be given a confidential presentation of the draft audit findings in October 2024.

All recipients of wood from the WNF were contacted by phone and Resolute had representatives at the field audit. No concerns were received from the wood recipients.

Field Site Selection: WNM provided digital information on the activities within the scope of the audit period. The lead auditor randomly selected more than a 10% sample of each activity and regeneration survey reported to the MNR. Sites were selected in accordance with the guidance provided in IFAAP. The field sample was reviewed by the WNM and MNR district during a virtual meeting in June.

Site Audit: The site audit was conducted the week of July 23, 2024. The auditors were divided into two teams for the truck audit for one day and one team member conducted the aerial reconnaissance of silviculture surveys and inaccessible sites for one day with a representative from the SFL. The field audit achieved a minimum of 10% sample of activities that occurred during the audit period and the silvicultural surveys submitted. A sample of the areas invoiced in the Forest Renewal Trust Specified Procedures Report was included to verify work was performed.

IFA Field Sampling Intensity on the Wabadowgang Noopming Forest

Activity	Audit Scope Total ha	Sample selected ha	%
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Harvest – clearcut	6,672	1,191	17.8%
Site Prep - mechanical	0	0	NA
Site Prep - chemical	0	0	NA
Tree Planting	3,504	632.2	18.0%
Seeding	0	0	NA
Natural Regeneration	937	110	11.8%
Manual Tending	0	0	NA
Chemical Tending Air	0	0	NA
Chemical Ground	0	0	NA
Regeneration assessment (FTG)	12,617	1,493	11.8%
	Total # or KM	Sample # or KM	
Road Construction	38.3	4.7	12.3%
Road Decommissioning	8.7	0.92	10.6%
Roads Constructed and Decommissioned	Construct: Collins, McIntyre, Rushbay, Dalton, Altar, Kena Decom: Spino	Rushbay, Spino	
Water Crossings New	31	4	12.9%
Water Crossing Decom not ice	27	3	11.1%
Aggregate Pits - open	15	3	20.0%
Aggregate pits - closed	12	2	16.7%

This selection includes the following sample of the silviculture activities that were charged to the Forest Renewal Trust in the 2022-2023 fiscal year and assessed as a Specified Procedures portion of the IFA.

	2022-2023 Total ha	Sample selected ha	%
Site Prep - mechanical	0		
Site Prep chemical	0		
Tree Planting	1724	537	31.1%
Seeding	0		
Natural Regeneration	430	86	20.0%
CLAGG	0		
Manual Tending	0		
Chemical Tending -air	0		
Chemical Ground	0		
Regeneration Assessment (FTG)	1,963	207	10.6%

The closing meeting was held on August 1, 2024.

The field audit covered a random sample of operations during the audit period as visiting all operations is not practical. Individual sites are selected to represent an activity but all associated activities that occurred on the site are assessed and reported in the sample table above. The audit team inspected the area of concern prescription application, forestry aggregate pits, bridges, water crossing installations and water crossing removals.

Summary of Opinions and Input to the Audit Team

Public Stakeholders

No public comments were received.

MNR

MNR staff comments expressed to the audit team:

- There are historically very large AOCs around many lakes for tourism concerns that may not be present. The Planning Team chose to maintain all AOCs and did not validate the presence of the existing tourism value. You will find this in the task team minutes. There was a misunderstanding about evergreen resource stewardship agreements from some RBTO's. Winter timing on top of other constraints really constrains the use of the forest.
- Consultation took a lot of time with lots of concerns identified. The ALCC is interest based and was very involved in the FMP. The membership is heavily weighted to environmental concerns.
- The inventory was delivered on time. NWES was key to updating the inventory.
- Caribou use was well documented. Caribou Lake had lots of calving and nursery area locations.
- Wolverine has no known denning locations.
- An unofficial access point on Wabakimi Lake led to a CLUPA discussion and this is documented in the PT minutes.
- LCC was very engaged.
- Dalton Road was originally a branch road and late in the process it was changed to a primary
- The Draft CP was submitted. later than the ideal time line for an FMP. With the CP timeline closing it was very tight to complete.
- During plan development there was a lot of staff turnover – 3 regional Planning Foresters worked on it. Continuity was difficult. The Resource Liaison Specialist position had a lot of transition. The regional biologists left for other positions.
- Conversations about roads lingered through the plan process. Harvest allocation is under the available harvest area, not achieving objectives. Harvest and silviculture are difficult in remote locations. The industry's downturn with mill closures and distance to the mill from the forest will make utilization challenging.
- There is a strong opposition to herbicides.

- In some cases, mining is complicating forest operations. There are different rules around mining exploration regarding road development and access approvals.
- Since 2008 there has not been a lot of activity in the forest. Most of the harvest was in the winter. Stakeholders were accustomed to past logging practices so changing to a year-round harvest is challenging.
- Lots of experienced individuals involved from varied backgrounds led to well founded discussions during the FMP development making the planning process memorable.

First Nations and Métis Communities

- Natural Resource Advisor for Kiashke Zaaging Anishinaabek (Gull Bay First Nation) joined the field audit as a learning experience.

LCC

- A member of the LCC was concerned about the application of the Boreal Landscape guide in relation to caribou habitat.
 - The harvesting from south to north. Inadequately addressing silviculture and roads.
 - Weakness in the development and implementation of meaningful silvicultural effectiveness monitoring to measure the achievement of replacing caribou habitat.
 - Linear feature and operational and branch road decommissioning and rehabilitation.
- The hardwood strategy for addressing mixedwood stands is flawed and inconsistent with the theoretical approach used to calculate available harvest areas and the amount of conifer that can be harvested.
- There was a concern with previous audit findings and how they were addressed.
- The amalgamation just prior to the 2011 FMP and de-amalgamation of the unit in 2021 with Lake Nipigon showed a fundamental flaw in the process of forming enhanced SFLs. It made tracking progress against long term targets difficult.
- Other ALCC members attended the field audit and expressed concern with the protection of tourism values.

OLA/OLL Holders

Resolute did not express any concerns with respect to the Wabadowgang Noopming Forest or its management. Resolute representatives were on the field audit.

WNM

- The planning process was quite contentious. The ALCC is divided with the balance of power heavy to tourism which creates a one-sided position. Whitesand First Nation engaged separately from the ALCC. One local tourist outfitter supported forestry activities. Friends of Wabakimi

(FOW) is a strong voice and heavy influencer with Environmental Non-Governmental Organization ties. Armstrong and the WNF is a gateway to Wabakimi Park.

- FOW lobbied for very prescriptive AOCs near the park. Summer harvest ground is in the buffer.
- Whitesands members did not support blocking of the roads as these roads leading to the park already had public lands act signs. Physical barriers would have prevented First Nation members access to part of the forest for hunting and fishing. The issue with the roads was quite contentious.
- The transition from MNR to WNM was quite smooth. Resolute was very supportive of the transition.
- Through the Buchanan bankruptcy some information was lost. Annual reports were hard to get. The MNR region has data for FTG, which was caught up in 2020-2021 when it was done under an MNR contract.
- There has been no salvage but lots of wind damage. Inventory volumes were calculated to be quite low – actuals are exceeding expectations.
- Inventories had an age issue.
- Herbicide has not been applied as it is a contentious issue. There is a commitment to not convert hardwood stands to pure softwood stands but there is a need to keep softwood. There is an herbicide alternative project, and it has been getting funding. The landscape guide dictates movement towards more conifer.
- Community meetings are held with Whitesand First Nation quarterly. The Landscape guide is seen as a risk. There is a lot of talk about the cost of wood and distance to wood producing facilities. A stumpage adjustment factor has been proposed. Older blocks need vegetation management – a social aspect of forestry.
- A hardwood utilization strategy is in place. Conifer sawlogs are in demand, but the hardwood is not. Contractors are struggling to find workers. Because of distance they are running bush camps and this is a challenge for workers. Only a few locals work in the bush.

Appendix 5

List of Acronyms

ALCC	Armstrong Local Citizens Committee
AOC	Area of Concern
AR	Annual Report
AWS	Annual Work Schedule
BLG	Boreal Landscape Guide
B.Sc. F.	Bachelor of Science in Forestry
CFSA	Crown Forest Sustainability Act
CLUPA	Crown Land Use Planning Atlas
CP	Contingency Plan
CRO	Conditions on Regular Operations
DCHS	Dynamic Caribou Habitat Schedule
eFRI	enhanced Forest Resource Inventory
FFTC	Forestry Futures Trust Committee
FIM	Forest Information Manual
FL	Forest Licence
FMP	Forest Management Plan
FMPM	Forest Management Planning Manual
FMU	Forest Management Unit
FOIP	Forest Operations Information Program
FOP	Forest Operations Prescription
FOW	Friends of Wabakimi
FRL	Forest Resource Licence
FRT	Forest Renewal Trust
FTG	Free-to-grow
FU	Forest Unit
Ha	Hectare
IFA	Independent Forest Audit
IFAPP	Independent Forest Audit Process and Protocol
KM	Kilometre
LCC	Local Citizens Committee
LTMD	Long-Term Management Direction
MNR	Ministry of Natural Resources
M ³	Cubic Meters
M.Sc. F.	Master of Science in Forestry
MU	Management Unit
NRIP	Natural Resources Information Portal
NWES	NorthWinds Environmental Services
R.P.F.	Registered Professional Forester
SAR	Species at Risk
SFL	Sustainable Forest Licence
SFMM	Strategic Forest Management Model
SGR	Silvicultural Ground Rule
WNF	Wabadowgang Noopming Forest

WNM	Wabadowgang Noopming Forest Management Inc.
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Appendix 6

Audit Team Members and Qualifications

Name	Role	Responsibility	Credentials
Janet Lane, R.P.F.	Lead Auditor Public Participation including First Nations & LCC Participation in Forest Management Planning. Field Audit Harvest, Access and Renewal Assessment of Achievement of Forest Management Objectives	Audit Management and Coordination Liaison with forest manager, MNR & FFTC. Review documentation and practices related to forest management Planning and public participation. Review the function of the LCC. Review and inspect harvest and silvicultural practises Determination of Objective Achievement Determination of Sustainability	B.Sc. F.
Dave Legg	Forest Management Planning Harvest and Silviculture Auditor	Review Forest Management Plan production and review and inspect harvest and silviculture practices Review of operational compliance to AOC implementation Determination of Sustainability	B.Sc. F.
Jack Harrison, R.P.F.	Forest Compliance Monitoring Harvest and Silviculture Auditor	Review and inspect the documentation related to contractual compliance. Review and inspect AOC documentation and practices Review of operational compliance to AOC implementation Review of the planning and delivery of the operational compliance program Review and inspect harvest and silvicultural practises Aerial sampling of renewal success Determination of Sustainability	B.Sc. F.