

Ogoki Forest Independent Forest Audit 2025

April 1, 2017 – March 31, 2025



Prepared by:

Caliber Forestry Consulting Co.

October 28, 2025

King's Printer for Ontario, 2025

Cette publication hautement spécialisée (Independent Forest Audit Report – Ogoki Forest 2017-2025) n'est disponible qu'en anglais conformément au Règlement 671/92, selon lequel il n'est pas obligatoire de la traduire en vertu de la Loi sur les services en français. Pour obtenir des renseignements en français, veuillez communiquer avec le Ministère des Richesses naturelles et des Forêts au NRISC@ontario.ca



Table of Contents

1.0 Executive Summary.....	1
2.0 Table of Findings.....	3
3.0 Introduction.....	4
3.1 Audit Process.....	4
3.2 Management Unit Description.....	5
4.0 Audit Findings.....	8
4A Regulatory Requirement – Compliance.....	8
4B Regulatory Requirement – Meeting FMP Objectives.....	9
4C Regulatory Requirement – Planned versus Actual.....	12
4D Regulatory Requirement – Action Plan.....	15
4E Regulatory Requirement – Licence.....	16
4F Regulatory Requirement – Sustainability.....	17
4.1 Concluding Statement.....	21
Appendix 1: Findings and Best Practices.....	22
Appendix 2: Management Objectives Assessment.....	34
Appendix 3: Compliance with Contractual Obligations.....	43
Appendix 4: Audit Process.....	45
Appendix 5: List of Acronyms.....	48
Appendix 6: Audit Team Members and Qualifications.....	50



List of Figures

Figure 1: Ogoki Forest Location Map.....	6
Figure 2: Age Class Distribution by Forest Unit on the Ogoki Forest.....	7
Figure 3: Infected Sb Needles.....	12
Figure 4: Slash pile windrows perpendicular to road.....	16
Figure 5: MNR Forest Explorer Ogoki Overview.....	18
Figure 6: MNR Silviculture Obligations Assessment.....	19
Figure 7: Richment Lowland Spruce FTG.....	24
Figure 8: Junior-1 Culvert Crossing.....	25
Figure 9: HLR-1 Forestry Aggregate Pit.....	26
Figure 10: Natural Regeneration and Competition.....	27
Figure 11: FTG Jack Pine with Hardwood Component.....	29

List of Tables

Table 1: Findings and Best Practices.....	3
Table 2: Current Seed Inventory (August 14, 2025).....	12
Table 3: FMP Planned versus Actual Renewal Treatment (2017-2020).....	12
Table 4: FMP Planned versus Actual Renewal Treatment (2020-2024).....	13
Table 5: Planned versus Actual Volume and Harvest Area (2017-2025).....	13
Table 6: Annual Report Renewal Accomplishments (2017-2024).....	19
Table 7: GFMI Silvicultural Obligations Data (2017-2024).....	20
Table 8: Annual Report Renewal Treatments.....	31
Table 9: GFMI Regeneration Backlog.....	32
Table 10: Field Audit Sampling Intensity.....	46
Table 11: Field Audit Sampling Intensity for 2023/24 Specified Procedures.....	46



1.0 Executive Summary

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

The Ogoki Forest is currently a Crown Management Unit administered by the Ontario Ministry of Natural Resources, Nipigon Geraldton District, in the Northwest Region. MNR has entered into a Forestry Agreement with Agoke Development Limited Partnership. Implementation of the Forestry Agreement has been contracted to GreenForest Management Inc.

This Independent Forest Audit for the Ogoki Forest covered an eight-year period of April 1, 2017, through March 31, 2025. The audit scope included the implementation of Phase II of the 2008-2018 Forest Management Plan (year 10), and the preparation and implementation of the 2018-2019 FMP Extension (1 year), 2019-2020 FMP Extension (1 year), 2020-2021 Contingency Plan, and the preparation and implementation of the 2020-2030 FMP (year 1,2,3,4,5).

The 2017 Independent Forest Audit identified 11 findings, with three action items identified as ongoing during the scope of this Audit:

Finding #4, Action #5: The Forest Access and Monitoring Tracking program was briefly implemented in 2011 but ceased in 2013 when the Sustainable Forestry Licence was surrendered. This program was resurrected in 2019/20.

Finding #7, Action #4: The 2014/15 Annual Report was not approved until 2020.

Finding 10, Action #1: Slash management did not occur until the program was implemented in 2020.

The Local Citizens Advisory Committee has been active for many years, including full participation on the 2020-2030 Forest Management Plan Planning Team, including the Consultation Task Team.

The Ogoki Forest is not certified under a third-party forest management certification system.

The forest is located adjacent to the Wabakimi Provincial Park in an area with many remote tourism concerns. Some forest management activities have been altered by Area of Concern prescriptions and access management restrictions to strike a balance between the desire to reduce access for remote tourism interests and the desire for access to the forest for traditional use by First Nations.

The forest is far from markets and has limited access. The majority of the forest is Boreal conifer with some mixed wood. The available wood supply from the forest is not being fully utilized due to a lack of markets for some species/products and as a result harvesting is currently concentrated in the conifer-dominant forest types.

Overall, the objectives of the 2008-2018 Forest Management Plan were met, and any deviations were assessed and the impact on sustainability determined. New objectives were incorporated into the 2020-2030 Forest Management Plan to meet the changing requirements. The review of the documents emphasized that there was a struggle with the Boreal Landscape Guide direction to increase conifer in the continuous caribou range, given the opposition to the use of herbicides

and the expense to convert hardwood and mixedwood forest to higher conifer component stands.

The active roads are well maintained; however, the turnover of staff and contractors limits the knowledge of acceptable water crossing construction practices and aggregate pit standards.

Forest management operations were found to be well done. The harvest operations did not cause site disturbance, and good utilization of marketable fibre was observed.

A review of the Ministry of Natural Resource District compliance program found that there was an inconsistency in the creation of Annual Compliance Operating Plans, and when created, the results were not consistently recorded. The MNR regularly travelled to the field throughout the audit period to monitor forest operations and met regularly with the forest industry representatives to discuss compliance trends and to work through operational issues to resolve them.

The silviculture program relies heavily on natural regeneration. Some of the silviculture ground rules have unrealistic timeframes and heights for establishment standards. Renewal treatments have not been initiated on some sites in quick succession to harvest, potentially allowing competition to affect renewal efforts.

The audit team reviewed the contractual obligations in the Forestry Agreement 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 Procedure Audit review was completed as reported.

Overall, the audit team concludes that the management of the Ogoki Forest was generally in compliance with the legislation, regulations and policies that were in effect during the period covered by the audit, and the Ogoki Forest was managed in compliance with the terms and conditions of the Crown Forest Sustainability Act, Forest Resource Licence and the Forestry Agreement held by Agoke Development Limited Partnership.

While the Ogoki Forest struggles with attracting contractors, harvest and renewal activities are currently growing to meet the FMP targets. The 2017 IFA and early in the scope of this audit, sustainable forest management practices were not fully being followed; however, during the more recent years of this audit term, there has been great improvement in moving toward meeting FMP targets and sustainable forest management.



David Legg, Lead Auditor
Caliber Forestry Consulting Co.
www.caliberconsultingco.ca

Janet Lane, R.P.F.



2.0 Table of Findings

CONCLUDING STATEMENT

Overall, the audit team concludes that the management of the Ogoki Forest was generally in compliance with the legislation, regulations and policies that were in effect during the period covered by the audit, and the Ogoki Forest was managed in compliance with the terms and conditions of the Crown Forest Sustainability Act, Forest Resource Licence and the Forestry Agreement held by Agoke Development Limited Partnership, who has contracted GreenForest Management Inc. to supply the services.

While the Ogoki Forest struggles with attracting contractors, harvest and renewal activities are currently growing to meet the FMP targets. The 2017 IFA and early in the scope of this audit, sustainable forest management practices were not fully being followed; however, during the more recent years of this audit term, there has been great improvement in moving toward meeting FMP targets and sustainable forest management.

FINDINGS

Finding #1

MNR does not have a fully completed monitoring plan in accordance with the Compliance Handbook.

Finding #2

Some silviculture ground rules have unrealistic timeframes and height standards for regeneration establishment.

Finding #3

Water crossing installation requirements and aggregate pit standards are not being fully followed.

Finding #4

Without the use of tending, renewal is at risk of not meeting prescribed Silviculture Ground Rule standards and the Forest Management Plan conifer objectives for woodland caribou habitat.

Finding #5

The current harvest level is insufficient to achieve the desired forest composition and age-class structure to meet the Forest Management Plan objectives for the habitat requirements of the woodland caribou.

Finding #6

Renewal treatments have not been initiated on areas harvested in 2018-2020.

BEST MANAGEMENT PRACTICES

Best Management Practice 1:

Engaging alternative reforestation funding sources to improve the forest resource.

Table 1: Findings and Best Practices



3.0 Introduction

The audit process followed the risk-based approach as outlined in the Independent Forest Audit Process and Protocol (IFAPP).¹ This report presents the findings of an Independent Forest Audit (IFA) of the Ogoki Forest conducted by Caliber Forestry Consulting Co.

The IFA for the Ogoki Forest covered an eight-year period from April 1, 2017, through March 31, 2025. The audit scope included the implementation of Phase II of the 2008-2018 Forest Management Plan (year 10), and the preparation and implementation of the 2018-2019 FMP Extension (1 year), 2019-2020 FMP Extension (1 year), 2020-2021 Contingency Plan, and the preparation and implementation of the 2020-2030 FMP (year 1,2,3,4,5).

The Ogoki Forest is currently a Crown Management Unit (CMU) administered by the Ontario Ministry of Natural Resources, Nipigon Geraldton District, in the Northwest Region, under a Forestry Agreement (FA) with Agoke Development Limited Partnership (ADLP). ADLP contracts the forest management services of GreenForest Management Inc. (GFMI) for the implementation of the Forestry Agreement. As forest managers, ADLP and MNR are the Auditees; however, reference materials and information provided by GFMI is supplied under the contractual commitment between ADLP and GFMI. Under the FA, ADLP is responsible for conducting all inspections, surveys and planning documents.

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

3.1 Audit Process

Independent Forest Audits are a requirement of the Crown Forest Sustainability Act (CFSA)². All Sustainable Forest Licences (SFL) and CMUs must be audited once every ten to twelve years by an independent auditor. The IFAPP was used as the guiding document to assess whether the forest is meeting the requirements of Ontario Regulation 319/20³ made under the CFSA. The Auditees include the FA holder and applicable MNR District, Region and Corporate organizations.

The auditors reviewed the regulatory requirements in Appendix A, Section III of the IFAPP, previous audit results, and provided background information to determine through a risk assessment to determine whether any criteria would require additional investigation. This risk assessment 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 IFAPP. The audit assesses the Forestry Agreement holder and MNR (the Auditees) and their compliance with the approved forest management plans (FMP), 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 is designed to assess whether actual results are comparable with planned results, whether approved prescriptions were followed and whether forest operations were accurately reported.

¹ OMNR. 2024. *Independent Forest Audit Process and Protocol*, Toronto. King's Printer for Ontario. 94pp.

² *Crown Forest Sustainability Act, 1994, S.O. 1994, c. 25*

³ *O.Reg 319/20: Independent Forest Audits*

The audit report documents Auditors findings of non-conformance as well as best management practices in Appendix 1. Findings of non-conformance are observations by the audit team where requirements are not fully met or the identification of a significant lack of effectiveness in forest management activities. Best management practices are recognized when Auditees' actions go beyond the legal requirements, and their actions result in a positive outcome for the forest and its stakeholders. IFA findings are addressed by the Auditees in an action plan, and the progress towards the completion of the actions will be reported in the Annual Reports (AR). Details of the audit plan and processes are outlined in Appendix 4.

Caliber Forestry Consulting Co. conducted the field audit in August 2025, 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 current Ogoki Forest, established on April 1, 2003, after the merger with northern portion of the Nakina Forest, is located in the MNR Northwest Region. The Nipigon Geraldton District is the lead in administering the Ogoki Forest.

There are no communities located within the management unit boundaries; however, the Municipality of Greenstone (Geraldton, Longlac, Nakina, Jellicoe, Caramat, Orient Bay and Beardmore), Nipigon, Terrace Bay, and Thunder Bay are located nearby and benefit from use of the Ogoki Forest.

In addition, the following Indigenous Communities have traditional territories that are overlapping or adjacent to the Ogoki Forest:

- Animbiigoo Zaagi'igan Anishinaabek (AZA)
- Aroland First Nation (AFN)
- Eabametoong First Nation (EFN)
- Marten Falls First Nation (MFFN)
- Ginoogaming First Nation (GFN)
- Long Lake #58 First Nation (LL58)
- Whitesand First Nation (WFN)

On March 22, 2018, Agoke Development Limited Partnership (Aroland, Eabametoong and Marten Falls First Nations) entered into a Forestry Agreement (FA) and a Forest Resource Licence (FRL) with the Ministry of Natural Resources to take on forest management responsibilities of the Ogoki Forest. The Forest Agreement was renewed for the term of April 1, 2022, through March 31, 2027. ADLP has contracted GreenForest Management Inc. to carry out these forest management duties. GFMI's head office is located in the City of Thunder Bay, Ontario with satellite offices in Sioux Lookout, Greenstone (Longlac) and Manitouwadge, with staff working in White River and Red Rock.

The Métis Nation of Ontario – Greenstone Métis Council has been deemed by the MNR District Manager to not have interests within or adjacent to the Ogoki Forest, as described in the Forest Management Planning Manual. Therefore, the Métis Nation has not been included in any specific communications related to this audit.

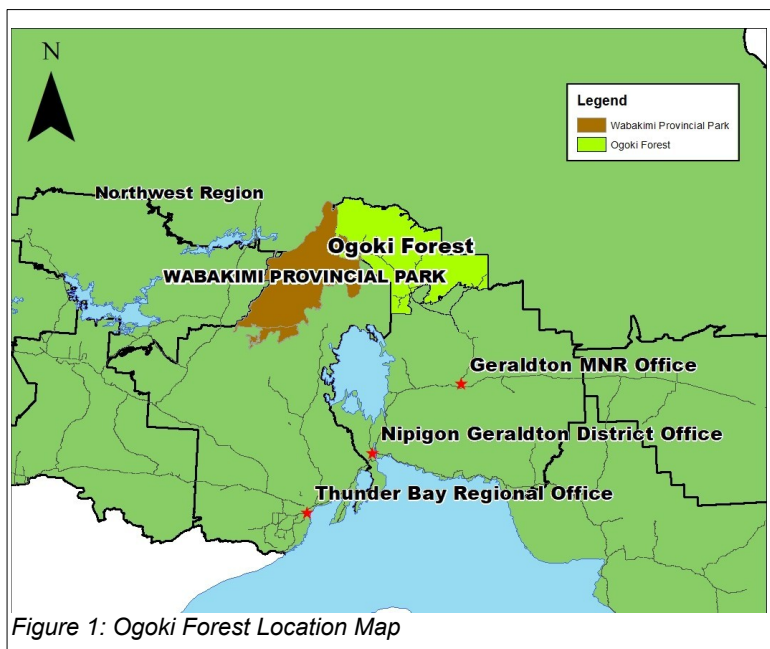
Recreational use and general forest use by the local population is high in areas open to public access. Approximately 83% of the primary roads and 46% of the branch roads are closed to

public traffic due to proximity to Wabakimi Provincial Park and the operation of remote tourism businesses.

Local citizens, business owners and First Nations representatives have been very active on the forest and involved in the forest management planning, during open houses and as participants on the Geraldton Area Natural Resources Advisory Committee (GANRAC).

GANRAC is the only Local Citizens Committee (LCC) associated with the Ogoki Forest, with representation on the committee from Longlac, Terrace Bay, Beardmore, Nakina, and Geraldton, which are directly affected by the Ogoki Forest. The current membership lists 16 positions with 3 vacancies, which have proven difficult to fill.

There is a long history of forestry activity in the forest. Lately, the forest industry has had significant downtime and changes in forest product demands. More recently, the demand for wood fibre from the forest has recovered with year-round harvesting.



The Ogoki Forest is located north of Lake Nipigon and lies within the northern portion of the Nipigon Geraldton MNR Administrative District, with approximately 1,087,985 hectares of Crown land. It is about 400 km north of the City of Thunder Bay and is accessible via Highway #584 and #643 north out of Geraldton. This forest is bordered by the Kenogami Forest and Lake Nipigon Forest to the south, and on the west by Wabadowgang Noopming Forest and by Wabakimi Provincial Park.

The Ogoki Forest 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.

While over 72% of the Ogoki Forest's Crown land is designated for production and available for forest management, significant restrictions exist. Large areas of concern (AOC) prescriptions, particularly around tourist operations and Wabakimi Provincial Park, limit the scope of forest management opportunities.

The forest is located within the Nipigon continuous range for woodland caribou. This species at risk (SAR) habitat management is a major influence in landscape planning. The range population of woodland caribou was considered stable in the federal recovery strategy produced in 2012⁴.

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.*



Conifer-leading stands, whether pure or mixed, account for over 50% of the area. Hardwood-leading stands represent a smaller portion at 13%, with an additional 37% categorized as lowland forest.

The Boreal Forest typically features black spruce, white spruce, jack pine, poplar, white birch, cedar, and larch. Historically, wildfires frequently disturbed this forest until the late 1990s, largely due to limited road access for fire suppression. With increased fire control and reduced fire frequency, the forest has aged significantly; with 86% now considered mature (over 80 years). Figure 2 shows a rise in immature forests in the last 20-years attributed to an increase in

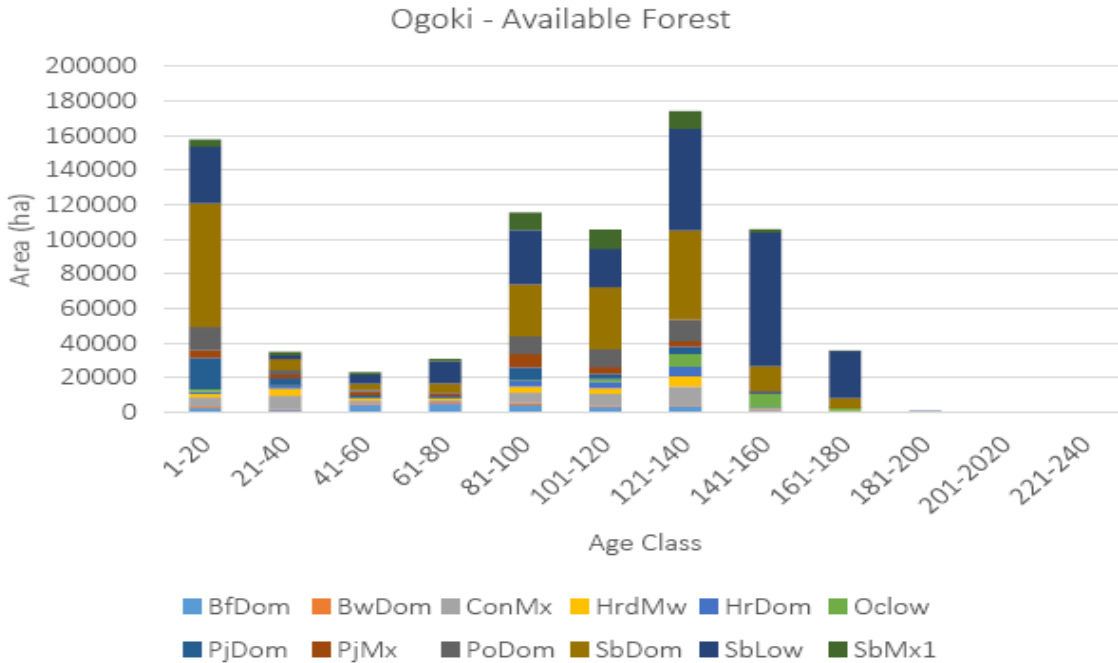


Figure 2: Age Class Distribution by Forest Unit on the Ogoki Forest

harvesting since 1988. However, potential future wood supply issues may arise from shortfalls in the 21-80 year age classes.

In summary⁵, this is a productive forest composed of mostly upland conifer-dominant mature and over-matures stands. The forest has not experienced major stand-replacing natural disturbances, but there have been a few large forest fires that have affected stand volumes.

⁵ Forest Units – BfDom (Balsam Fir), BwDom (White Birch), ConMx (mixed conifer), HrdMw (mixed hardwood), OcLow (lowland conifer), PjDom (Jack Pine), PjMx (Jack Pine with other conifer), PoDom (Poplar), SbDom (Black Spruce), SbLow (lowland black spruce), SbMx1 (black spruce with other conifer)



4.0 Audit Findings

The Independent Forest Audit Process and Protocol (IFAPP) include six regulatory requirements (A to F) as fundamental requirements of the regulations and serves to guide the implementation and interpretation of the audit process and protocol.

Each of the six sections will be discussed, addressing any concerns related to their subsections.

4A Regulatory Requirement –Compliance

A.1 Consultation

A.1.1 First Nations and Métis Communities' Involvement and Consultation

The First Nations communities are very engaged in forest management planning and forest operations in the forest. All communities were invited to participate in the forest management planning process and the 2020-2030 FMP development. Three meetings were held with the First Nations communities to define the desired forest and its benefits. Concerns raised by the First Nations included the use of herbicides, trapper's values and water quality. These were given consideration by the Planning Team during the development of the FMP.

Three members of local First Nations took part in the field audit.

The Métis Nation of Ontario – Greenstone Métis Council has been deemed by the MNR District Manager to not have interests within or adjacent to the Ogoki Forest as described in the Forest Management Planning Manual. Therefore, the Métis Nation has not been included in any specific communications related to this audit.

A.1.2 Local Citizens' Committee (LCC)

The Geraldton Area Natural Resource Advisory Committee (GANRAC) is a standing committee appointed by the Nipigon Geraldton District Manager. The terms of reference have stated the purpose of the GANRAC with membership including representation from First Nations, naturalists, tourism, cottaging, Municipalities, trappers, hunters, anglers, mining, crown recreation, local business and the forest industry. GANRAC includes 16 positions with 3 vacancies, which have proven difficult to fill.

The Terms of Reference for the Geraldton Area Natural Resources Advisory Committee do not entirely conform to the requirements outlined in Section 2.2.4 of Part A of the FMPM. Specifically, the date of each member's appointment is not included in the list of members.

GANRAC meets at least 10 times per year. The members interviewed indicated that amendments, annual reports, and annual work schedules are presented by MNR and GFMI. GANRAC has developed an 'amendment categorization protocol' based on the previous 2020 FMPM⁶ to efficiently recommend amendment classification to the District Manager. There is good attendance at most meetings.

The GANRAC representatives were active participants at planning team meetings. GANRAC's statement on the Ogoki 2020-2030 FMP development expressed they were satisfied that the FMPM process was followed, and the Planning Team made every effort to accommodate

⁶ OMNR. May 2020. *Forest Management Planning Manual, Toronto. Queen's Printer for Ontario. 318 pp*



concerns raised. The GANRAC members' self-evaluation of their effectiveness in the plan development was 84.8%.

Two members of GANRAC took part in the field audit.

A.1.3 Public Consultation

The requirements for public notification outlined in the FMPM for the 2020-2030 FMP development, annual work schedules, and amendments were met. The MNR has an extensive public contact list.

The 2020 COVID pandemic altered the traditional means of public consultation by limiting interaction; however, the public consultation through mail, email and phone calls for the plan and amendments met the requirements of the Forest Management Planning Manual. Several opportunities for stakeholders to consult with the Planning Team were provided as per the FMPM and the consultation was recorded in the 2018-2019 FMP Extension, 2019-2020 FMP Extension, 2020-2021 Contingency Plan and the 2020-2030 FMP.

GFMI and MNR maintain a positive relationship with the stakeholders.

A.2 Issue Resolution

There was no issue resolutions identified during the development of the 2020-2030 FMP.

A.3 Plan Production Activities

The development of the 2018-2028 FMP was delayed. With minimal harvesting taking place on the Ogoki Forest, MNR proposed 'plan extensions' to lengthen the FMP term to March 31, 2020. The Crown awarded the development of the 2020-2030 FMP to GFMI on June 23, 2017. A contingency plan was then developed for 2020-2021 to allow operations to continue until the full 2020-2030 FMP was approved on April 1, 2021.

A.4 Assess the Proper Development of the FMP

The Planning Team had a variety of opinions on modelling scenarios related to forest cycle years (100 yrs or 120 yrs) and the potential impacts on the proposed plan objectives. According to protocol, the Planning Team brought this issue to the Steering Committee (Action PT#14.2). On April 17, 2019, the Steering Committee decided on a slightly adjusted base model from earlier in the year. The Steering Committee followed a timely and orderly process.

There were no resource stewardship agreements (RSA) as this is a CU; however, remote-based tourism operators' concerns were addressed as received. The AOCs that are applied on the Ogoki Forest to protect tourism values cover significantly larger areas than in most forests. View-sheds were protected in areas where there were concerns.

4B Regulatory Requirement –Meeting FMP Objectives

B.1 Areas of Concern (AOCs)

Areas of Concern (AOC) prescriptions were observed in the field. One site (Mast-42) shown to the Auditors included a small excursion into the WQ1 AOC. Follow-up showed the incident was recorded in a compliance inspection (#703036), and a warning letter was issued.

B.2 Access

Roads were generally well-maintained, with a minimal footprint, good grading, and smooth surfaces. Several water crossing installations were observed to have issues: a short culvert and very large riprap (Junior-1). Also, the MNR has closed the water crossing (#BOXLK-03) on Box Lake Road due to improper installation.

Of the seven forestry aggregate pits observed, two pits (HLR-1, HLR-2) had excavations closer than the required five metres set back from trees.

Finding #3: Water crossing installation requirements and aggregate pit standards are not being fully followed.

B.3 Harvest

Wood Supply Agreements (WSA) are in place for AV Terrace Bay (90,540 m³/yr poplar), which closed in January 2024; and Levesque Plywood Limited (2,400 m³/yr veneer quality poplar) in Hearst. A business agreement is in place with Nakina Lumber in Longlac for all the conifer harvested on the Ogoki Forest.

Harvest operations were well done. There was no evidence of wasteful practices (marketable species), little ground disturbance, suitable residual trees and AOC prescriptions are in place to protect identified values.

Harvesting occurred on 20.7% of the planned area in the first four years of the 2020-2030 FMP. In the 2023/24 fiscal year, harvesting increased to 42.2% of the planned hectares due to significant improvements to the road network, including bridge replacements, right-of-way brushing, surface gravelling, and new road construction, which attracted larger logging contractors to the Ogoki Forest.

The 2020-2030 FMP includes a 'Mixed Conifer Hardwood Strategy' where the intent is to provide operational flexibility and regulatory tolerances to allow maximization of conifer harvest in a manner to not compromise the ability to achieve future forest targets.

Amendment #9 to the 2020-2030 FMP (approved April 28, 2025) provided changes to FMP Section 4.3.6 Wood Utilization to authorize conditions where wood utilization standards for Spruce-Pine-Fir have increased the merchantable minimum diameter to 12 cm, rather than the 10 cm identified in the Scaling Manual regulated under the Crown Forest Sustainability Act. Section E: Wasteful Practices of the Scaling Manual states, "*The minimum utilization standards must be followed on all forest operations unless otherwise described in an approved Forest Management Plan.*" This adjustment was needed to harvest sawlogs and reduce pulpwood harvest due to limited market demand.

B.4 Renewal

The 2020-2030 FMP states the renewal program will be 70% natural and 30% artificial regeneration. A total of 4,423 ha harvested since 2020, 75.5% of the area deemed no treatment was necessary and the sites were left for natural regeneration. The remaining 24.5% was tree planted, following the FMP renewal strategy.

During the field audit, the Auditors noted natural regeneration may not be able to meet the renewal standards specified in the FMP. Field observations at FALC-4 harvested site showed little evidence of balsam fir natural regeneration, as prescribed, two years after harvest. The shrub and herb layer is thick, and the debris is not yet settled. This block does not have the conditions to renew naturally within the timeframe identified in the silviculture ground rules (SGRs) BfDom-Nat. Similarly, a Richment FTG (free-to-grow) site harvested in 2005-2007 and rightfully declared FTG under an older set of renewal ground rules (S1-Nat-S1E), is a good example showing that the current SGR SbLowL-Nat timeframe of 5-10 years post-harvest to meet 1.0 metre in height is unrealistic.

Finding #2: Some silviculture ground rules have unrealistic timeframes and height standards for regeneration establishment.

Tree planting programs are conducted every few years to be able to develop a program to attract contractors. Tree planting sites observed indicated good coverage and high survival of the seedlings.

In 2023, two large forest fires occurred in the Ogoki Forest, consuming 30,006 ha in the Reckett Road area and 10,183 ha in the Heart Lake Road area. ADLP was approached by Integrity Reforestation⁷ who created a coalition to help restore these burnt areas by working with partners on alternative reforestation funding sources. Approximately 3.65 million seedlings are being grown to plant on suitable sites of these burnt areas. Tree planting of jack pine, black spruce and white spruce is scheduled to begin in 2025 on the Ogoki Forest.

Best Management Practice #1: Engaging alternative reforestation funding sources to improve the forest resource.

B.5 Tending and Protection

First Nations had raised concerns regarding herbicide use during the FMP development. As a result, ADLP has not utilized herbicides for tending. However, no herbicide tending or alternative methods have been discussed with the communities as was the intention described in the FMP, Sec 3.2.4.

The 2020-2030 FMP objectives include goals related to the 'Caribou Woodland Caribou Conservation Plan'⁸ and the Forest Management Guide for Boreal Landscapes⁹ (BLG) that identifies mature conifer stands and conifer-dominated lowlands as being critical habitats for rutting, calving, and wintering areas for woodland caribou. The auditors observed hardwood encroachment on regenerating conifer stands. These stands will not meet the definition of a conifer stand without stand tending, and the ability to meet these woodland caribou habitat objectives of the FMP may be compromised.

⁷ <https://www.integrity-reforestation.com/wildfire>

⁸ <https://www.ontario.ca/page/woodland-caribou-conservation-plan#section-5>

⁹ <https://www.ontario.ca/page/forest-management-boreal-landscapes>



Finding #4: Without the use of tending, renewal is at risk of not meeting prescribed Silviculture Ground Rule standards and the FMP conifer objectives for woodland caribou habitat.

B.6 Renewal Support

There is an abundance of good-quality seed in inventory. However, the majority of the jack pine and white spruce seed was collected before 2000, with the white spruce viability is now in the 75-78% range.

Species	Current Seed Inventory
Jack Pine	155,467,300
Black Spruce	63,284,091
White Spruce	719,225

Table 2: Current Seed Inventory (August 14, 2025)

No issues with the current planting stock were noted in the field. Observation of both natural and planted young black spruce indicates the presence of needle infection, which may be associated with environmental factors (Figure 3).



Figure 3: Infected Sb Needles

B.7 Assessment of Objective Achievement

Objectives described in the 2008-2018 FMP and the 2020-2030 FMP were reviewed, with comments provided in Appendix 2. In general, planned objectives have been met or are not a current concern.

4C Regulatory Requirement –Planned versus Actual

C.1 Annual Reports

During the scope of the audit, the Annual Reports (AR) were submitted on time as per the Forest Information Manual (FIM) requirements.

The following (Table 3) shows the actual renewal treatment percentages are slightly skewed to more natural regeneration than planned in the 2008-2020 FMP.

Renewal Method	Treated Hectares	Actual %	FMP Target
Tree Planting	581	34.9%	47.0%
Seeding	0	0%	0%
Natural	1,085	65.1%	53.0%
TOTAL	1,666		

Table 3: FMP Planned versus Actual Renewal Treatment (2017-2020)

The following (Table 4) indicates the actual renewal treatment percentages are generally following the strategies outlined in the 2020-2030 FMP.



Renewal Method	Treated Hectares	Actual %	FMP Target
Tree Planting	1,219	27.9%	26.7%
Seeding	0	0%	2.6%
Natural	3,145	72.1%	70.6%
TOTAL	4,364		

Table 4: FMP Planned versus Actual Renewal Treatment (2020-2024)

Based on 2020-2030 planned harvest areas, appropriate forest units, ecosites and site conditions have elevated the proposed natural regeneration program to 70% of the renewal program. Actual field surveys will verify all planned renewal prescriptions prior to treatments.

C.2 Enhanced Annual Reports

The enhanced Annual Report (2008-2021) indicates a total of 6,674 ha were harvested of the planned level of 69,356 ha (9.6%). A total of 8,655 ha was renewed (39% natural, 61% artificial) versus a planned level of 47% natural, 53% artificial, a trend towards more artificial renewal. Renewal treatments are based on SGR prescriptions and verified on the ground. With less than planned harvest levels, the renewal program is skewed based on actual harvested areas and their proposed treatments.

During the eight years of the scope of this audit (Table 5), 21% of the planned volume was harvested. However, harvesting has increased in the past 2 years to over 36% due to significant improvements to the road network, which has attracted larger logging contractors to the Ogoki Forest.

Year	Planned	Actual	%		Planned	Actual	%
	Volume (NMm ³)				Area (Ha)		
2020-2030 FMP							
2024/25	546,785	172,617	31.6%		7,627	NA	NA
2023/24	546,785	224,049	41.0%		7,627	3,219	42.2%
2022/23	546,785	46,958	8.6%		7,627	650	8.5%
2021/22	546,785	67,248	12.3%		7,627	775	10.2%
2020-2021 Contingency Plan							
2020/21	546,785	143,145	26.2%		7,627	1,680	22.0%
2008-2018 FMP & Extensions							
2019 Ext	652,867	130,963	20.1%		6,974	1,694	24.3%
2018 Ext	652,867	197,374	30.2%		6,974	2,212	31.7%
2017/18	652,867	5,144	0.8%		6,974	40	0.6%

Table 5: Planned versus Actual Volume and Harvest Area (2017-2025)

With the less-than-planned harvest levels, forest renewal activities have also been less than planned.

C.3 District Compliance Planning and Associated Monitoring

A review of the MNR District Compliance Plans during the audit period found that there was an inconsistency in the creation of Annual Compliance Operating Plans (ACOP) as per the Forest



Compliance Handbook¹⁰. When an ACOP was created, the results were not consistently recorded.

- 2017/18: ACOP was created – 2 FOIP reports were completed
- 2018/19: ACOP was created – 8 FOIP reports were completed
- 2019/20: ACOP was created, with no results recorded – 7 FOIP reports were completed
- 2020/21: No ACOP was created – 5 FOIP reports were completed
- 2021/22: ACOP was created, with no results recorded – 0 FOIP reports were completed
- 2022/23: ACOP was created, with no results recorded – 0 FOIP reports were completed
- 2023/24: ACOP was created – 8 FOIP reports were completed
- 2024/25: No ACOP was created – 6 FOIP reports were completed

During the audit period, there were a total of 263 Forest Operation Information Program (FOIP) inspections completed:

- 183 harvest
- 0 aggregate
- 72 access
- 8 renewal
- 0 maintenance

In addition, the inspection methods were 252 by Ground, 6 by Air, 2 from Office, and 3 by Supplemental Aerial Photos (SAP).

There were 172 Operational Issues identified during the scope of this audit, which is high, but most issues were minor in nature (i.e. high stumps). There were few repeat issues, indicating a systematic resolution. The current status is: 11 are Open, 4 have Corrective Actions approved, 3 have Corrective Actions completed (Resolved), and 154 are Closed.

A review of the “Pending” status during the audit period revealed a total of five FOIP reports that are ‘overdue’ as per the MNR Compliance Inspection Handbook. The ‘overdue’ status currently ranges from 77 days to 1984 days (5yrs, 5mos, 7days) overdue, primarily driven by the turnover of MNR Compliance Inspectors and attention to finalize these reports.

The MNR issued eight Written Warnings and zero Fines during the audit period.

Finding #1: MNR does not have a fully completed monitoring plan in accordance with the Compliance Handbook.

The MNR consistently went to the field throughout the audit period to monitor forest operations and met regularly with the forest industry representatives to discuss compliance trends and work to resolve any operational issues.

C.4 Forestry Agreement Holder Compliance Planning and Monitoring

Annual compliance planning and monitoring is included in each Annual Work Schedule. Priorities are developed based on review of completed inspections and discussions with MNR.

¹⁰ <https://www.ontario.ca/page/forest-compliance-handbook>



GFMI has certified compliance inspectors who monitor the forest activities and provided the following reports:

- 2017/18: 0 FOIP reports were completed
- 2018/19: 19 FOIP reports were completed
- 2019/20: 39 FOIP reports were completed
- 2020/21: 24 FOIP reports were completed
- 2021/22: 29 FOIP reports were completed
- 2022/23: 38 FOIP reports were completed
- 2023/24: 31 FOIP reports were completed
- 2024/25: 42 FOIP reports were completed

C.5 Compliance Responsibilities Delivered by Qualified Overlapping Licensees

There are no Overlapping Licensees on the Ogoki Forest.

C.6 Silviculture Standards and Assessment Program

In 2019, large-scale photography was used to assess a large backlog (59,965 ha) of free-to-grow (FTG) assessments. The 2020/21 Annual Report describes 56,677 ha were assessed, of which 48,571 ha were declared FTG to their appropriate SGR at the time of establishment. The undeclared areas (8,106 ha) are planned to be reassessed once regeneration has grown further.

Additional FTG assessments were conducted by ground surveys in 2024. Of 411 ha surveyed, 267 were declared FTG. Most areas were over 10 metres tall, indicating these areas were re-assessments of the above older undeclared stands.

GFMI maintains a silviculture obligations map (see Appendix #1, Finding #6), indicating renewal treatments carried out on harvested areas. Regeneration treatments are surveyed 2-3 years after natural renewal prescriptions, and year of plant, 1-year, 3-year and 5-years after tree plant to ensure treatment success.

4D Regulatory Requirement –Action Plan

D.1 Action Plan Development

The Ogoki 2010-2017 IFA Action Plan was approved on April 9, 2018, within the required timeframe, and posted on the MNR website¹¹.

D.2 Reporting on Progress Towards the Completion of Actions

In 2017, the previous IFA identified 11 findings, of which the 2020 IFA Status Report has identified most action items to be completed. The following actions were ongoing and required further review:

Finding #4 – development of a formal Roads Monitoring and Tracking program.

- The Forest Access and Monitoring Tracking program (FAMT), originally proposed in 2011, was briefly implemented and then surrendered in 2013. FAMT was resurrected, with results reported in the 2019/20 Annual Report.

¹¹ <https://www.ontario.ca/page/independent-forest-audits>



- The program continues to be utilized.

Finding #7 – 2014/15 Annual Report has not been completed

- The 2014/15 Annual Report was approved April 5, 2022.

Finding #10 – Licensee(s) following slash management procedures

- The slash management program started in 2020/21. Small windrows of slash piled perpendicular to the road to reduce the footprint were observed during the field audit (Figure 4).
- No slash pile burning has been planned in the 2020-2030 FMP.



Figure 4: Slash pile windrows perpendicular to road

Starting with the 2019/20 Annual Report, the progress toward completion of the Independent Forest Audit action plan has been included in the Annual Reports.

4E Regulatory Requirement –Licence

E.1 Forestry Agreement

The audit team concluded that Agoke Development Limited Partnership (Forestry Agreement holder), through GreenForest Management’s management activities, complies with the terms and conditions of the Forestry Resources Licence and their contractual agreements (Appendix 3).

GreenForest Management Inc. and MNR demonstrated a thorough knowledge of the land base and stakeholders. They performed all the required surveys.

E.2 Ontario Crown Timber Charges Payment

Before 2018, the Ogoki was fully managed by the Crown. There was no requirement for a Renewal Trust Fund (RTF) or a minimum balance. Since signing the Forestry Agreement and issuance of the Forest Resources Licence, an RTF was established with a minimum balance of \$2,000,000, which is currently being maintained. The annual review of renewal stumpage fees has determined that no changes were required to meet this minimum balance, as approved by the District Manager and Regional Director.

The Ontario Crown Timber Charges have been paid by the Licencees.

E.3 Forest Renewal Trust Eligible Silviculture Work

A Specified Procedure Audit took place to review silvicultural expenditures on the Ogoki Forest during the fiscal year of April 1, 2023 – March 31, 2024. Review procedures are performed based on compliance with financial terms under the Forest Resource Licences, the MNR’s guideline “Forest Renewal Trust Eligible Silviculture Work – April 2017”, and the MNR’s “Forest Renewal Trust Claims Process for Forest Managers 2023-2024”.

The Specified Procedure Audit summarized that the silviculture invoices matched the 2023/24 activities and the Annual Report table AR-4.

E.4 Forestry Agreement Conclusion in Final Audit Report

Overall, the audit team concludes that the management of the Ogoki Forest was mostly in compliance with the legislation, regulations, and policies that were in effect during the period covered by the audit. Additionally, the Ogoki Forest was managed in compliance with the terms and conditions of the Crown Forest Sustainability Act and the Forestry Agreement held by Agoke Development Limited Partnership. The forest is being managed consistently with the principles of sustainable forest management, as assessed through the IFAPP.

4F Regulatory Requirement –Sustainability

The objectives table in the 2020-2030 FMP followed the 2017 FMPM requirements (Part A, Section 1.2.5.1). A dynamic caribou habitat schedule (DCHS) with a 100-year rotation has been established, causing mature and over-mature stands within C, D, and E blocks planned for harvest after 2038 to degrade due to natural forest succession. Similarly, the lack of harvest operations (21% of planned over the past eight years) will add to the overmature nature of the Ogoki forest.

Eventually harvesting will encounter stands with heavier understories of balsam fir and hardwoods where the canopy has naturally opened, resulting in less-than-desirable woodland caribou habitat. This over-mature state will add to the risk of forest fires and the degradation of forest products.

The Ogoki Forest is fully mosaiced with a dynamic caribou habitat schedule; however, it has not been harvested consistently. The distance from processing facilities and the closure of the nearest pulp mill have impacted the harvest on the forest. Despite these challenges, harvest levels have been managed for conifer and veneer quality poplar, and road building is proceeding. Silviculture establishment seems to be consistent with the planned renewal.

Regardless of efforts and good intentions, the harvest is not at a pace to meet planned harvest levels, and the forest will remain in an overmature state. The objective of creating a forest that will meet the habitat needs of the endangered woodland caribou will not be possible without an increase in forest harvesting (i.e. additional markets) or another approach (i.e. forest fire) to reset the forest stand ages.

Finding #5: The current harvest level is insufficient to achieve the desired forest composition and age-class structure to meet the FMP objectives for the habitat requirements of the woodland caribou.

F.2 Monitoring Indicators of Forest Sustainability

The indicators of sustainability in the Ogoki Forest 2020-2030 FMP are in place. The silviculture assessment program, as described in the FMP, is being implemented (see B.4 and C.6) but some of the establishment standards in the FMP for natural regeneration are unrealistic. A compliance program is partially achieved (see C.2 and C.3 above) and a monitoring program is taking place. The appropriate data is being reported in the annual reports each year.

F.3 Assessment of Long-Term Trends

The following (Figure 5) from the MNR’s Forest Explorer Technical Series¹² displays the summary of forestry activities on the Ogoki Forest, shows the fluctuation of activities over the past several years.

The harvest area (*green*) and volume (*dark grey*) show actual levels related to the planned (*light grey*), renewal area compares artificial (*brown*) to natural (*green*) treated areas, stumpage charges shows various payment types, renewal assessment (*green*) indicates FTG surveys conducted, and finally the natural disturbance (fire, insects) show various degrees of severity – moderate/severe (*orange*) and mortality (*red*).

Harvest levels over time are well below planned levels, and subsequent renewal treatments are following the harvest decline.

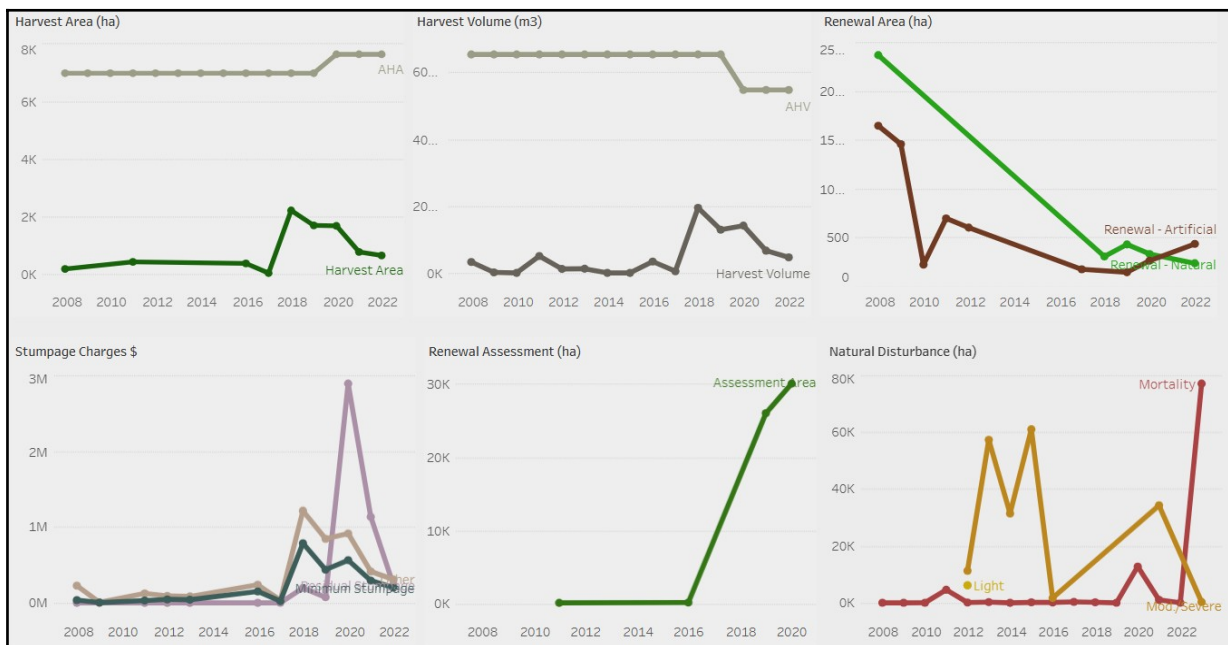


Figure 5: MNR Forest Explorer Ogoki Overview

MNR’s Silvicultural Obligation Assessment (SOA) website¹³ (Figure 6) shows a large portion of the harvest area (~50%) has initiated a renewal treatment as per the SGR (*yellow*) or has been declared established (FTG) (*green*). During the scope of this audit, about 50% the harvest area has not had renewal treatment initiated (*orange*). The blank years, indicate no harvesting took place on the Ogoki Forest, thus no renewal obligations are required to be tracked.

¹² https://public.tableau.com/app/profile/larlo/viz/FE_QuickFacts/DB_MUMap

¹³ https://public.tableau.com/app/profile/larlo/viz/Silv_ObligationsDashboard/DB_Overview



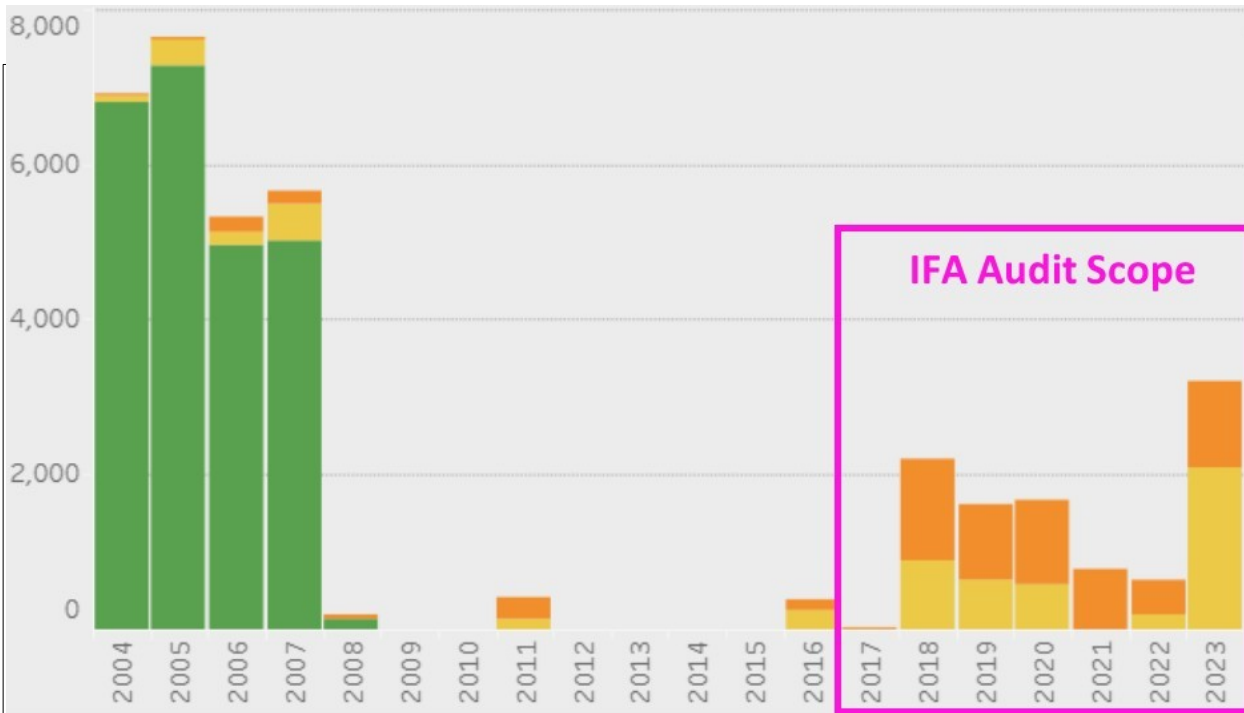


Figure 6: MNR Silviculture Obligations Assessment

The Annual Report submissions below (Table 6) support the SOA indicating about half of the harvested areas have forest renewal treatments reported. Understanding renewal efforts are reported in the year of activity and not by the year of harvest – this regeneration lag may slightly affect the specific renewal effort percentages.

Year	Actual Plant	Actual Seed	Actual Natural	TOTAL Renewal	TOTAL Harvest
	Ha				
2024/25	NA	NA	NA	NA	NA
2023/24	522	0	2,163	2,685	3,281
2022/23	434	0	237	671	705
2021/22	0	0	398	398	943
2020-2030 FMP					
2020/21	263	0	347	610	1,694
2020-2021 CP					
2019 Ext	144	0	431	575	1,720
2018 Ext	0	0	307	307	2,231
2017/18	174	0	0	174	40
2008-2018 FMP					
			TOTAL	5,420	10,614
					51.1%

Table 6: Annual Report Renewal Accomplishments (2017-2024)

During the field audit 1,531 ha of harvested area was reviewed, and most areas have initiated renewal treatments or have planned (recent cuts) to be treated. Table 7, data from GFMI identifies about 30.9% of the harvested area can be classified as areas recently harvested and



renewal treatments have not yet been initiated. About 27.4% of the harvested areas during this audit scope have not had renewal prescriptions declared in a reasonable time frame after cutting.

Activity	Ha	%
Harvest (Annual Reports)	10,614	
Renewal Initiated (Annual Reports)	4,423	41.7%
Renewal Planned (Recent Harvest)	3,281	30.9%
No Renewal Initiated	2,910	27.4%

Table 7: GFMI Silvicultural Obligations Data (2017-2024)

The 2,910 ha of harvest area with no renewal initiated has been determined to have been harvested in 2018 to 2020. The forest units (FU) are 58% conifer (PjPur, PjDom, SbDom, SpUp), 12% lowland conifer (Slow1, Slow3), 12% mixed conifer (CoMx1, CoMx2), and 1% hardwood (HwdMx). A large portion of this area was on winter access roads, making access questionable. Some of these areas have already been scheduled for surveys to determine appropriate renewal treatments.

Finding #6: Renewal treatments have not been initiated on areas harvested in 2018-2020.

The Ogoki has difficulty in soliciting and maintaining contractors to carry out silviculture activities due to the smaller programs and long travel distances. Tender packages for mechanical site preparation (MSIP), tree planting and slash piling are sent to all suitable contractors annually. Not all will provide a bid, or some bids are contingent on being awarded work on the neighbouring Kenogami Forest. Several awarded contracts have not been carried out and forwarded to the next years. GFMI has been accumulating treatment area to get a large enough program to attract reasonable bids from contractors.

F.4 Conclusion Regarding Sustainability of the Forest

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 to 2022, the lack of a forest product market, and travel distance to the Forest are a few of the more notable elements.

The forest product markets are cyclical. The 2006 closure of hardwood processing facilities in the area has led to an under-utilization of hardwood. A regional utilization strategy was updated in 2020 to consider strategies to limit the long-term impact of partial stand utilization. Similarly, the closure of the regional pulp mill in 2024 limited the possibility of movement of smaller diameter conifer species.

Regardless of effort and good intentions, the harvest is not on pace to meet the FMP planned levels and the forest will remain in an overmature state. The objective of creating a forest that will meet the habitat needs of the endangered woodland caribou will not be possible without an increase in forest harvesting (i.e. new markets) or another approach (i.e. forest fire) to reset the stand ages.

The silviculture program relies heavily on natural regeneration (70%). Modelling of future forest conditions during the development of the 2020-2030 FMP, had no restriction applied on renewal treatments selected based on applying appropriate silviculture ground rules on proposed



harvest areas. The modelling goals were to achieve volume harvest and wildlife habitat requirements.

GreenForest Management Inc. and the MNR work well together. They are focused on common goals and listen to the input of stakeholders and Indigenous Peoples.

4.1 Concluding Statement

Overall, the audit team concludes that the management of the Ogoki Forest was generally in compliance with the legislation, regulations and policies that were in effect during the period covered by the audit, and the Ogoki Forest was managed in compliance with the terms and conditions of the Crown Forest Sustainability Act, Forest Resource Licence and the Forestry Agreement held by Agoke Development Limited Partnership, who has contracted GreenForest Management Inc. to supply the services.

While the Ogoki Forest struggles with attracting contractors, harvest and renewal activities are currently growing to meet the FMP targets. The 2017 IFA and early in the scope of this audit, sustainable forest management practices were not fully being followed; however, during the more recent years of this audit term, there has been great improvement in moving toward meeting FMP targets and sustainable forest management.

Appendix 1: Findings and Best Practices

Independent Forest Audit –Record of Finding

Finding #1

Regulatory Requirement C: Planned vs Actual

Audit Criterion C.3: District compliance planning and associated monitoring

Procedure:

Review the MNR District Compliance Plans in place during the audit period to determine how forest management activities were to be monitored for compliance by MNR and assess whether the actual level of the overall monitoring program was in accordance with the FMP and whether it was appropriate based on evidence gathered through analysis of related audit criteria, including field audits.

Determine whether the MNR District submitted the MNR’s compliance information into FOIP and whether they supplied the FOIP information to the Forest Manager (FM) in accordance with requirements, including timelines specified in MNR procedures and the Forest Compliance Handbook.

Background Information and Summary of Evidence:

A review of the MNR District Compliance Plans during the audit period found that there was an inconsistency in the creation of Annual Compliance Operating Plans (ACOP) as per the Forest Compliance Handbook. When an ACOP was created, the results were not consistently recorded.

- 2017/18: ACOP was created – 2 FOIP reports were completed
- 2018/19: ACOP was created – 8 FOIP reports were completed
- 2019/20: ACOP was created, with no results recorded – 7 FOIP reports were completed
- 2020/21: No ACOP was created – 5 FOIP reports were completed
- 2021/22: ACOP was created, with no results recorded – 0 FOIP reports were completed
- 2022/23: ACOP was created, with no results recorded – 0 FOIP reports were completed
- 2023/24: ACOP was created – 8 FOIP reports were completed
- 2024/25: No ACOP was created – 6 FOIP reports were completed

During the audit period, there were a total of 263 Forest Operation Information Program (FOIP) inspections completed:

- 183 harvest
- 0 aggregate
- 72 access
- 8 renewal
- 0 maintenance

In addition, the inspection methods were 252 by Ground, 6 by Air, 2 from Office, and 3 by Supplemental Aerial Photos (SAP).

There were 172 Operational Issues identified during the scope of this audit, which is high, but most issues were minor in nature (i.e. high stumps). There were few repeat issues, indicating a systematic resolution. The current status is: 11 are Open, 4 have Corrective Actions approved, 3 have Corrective Actions completed (Resolved), and 154 are Closed.



A review of the “Pending” status during the audit period revealed a total of five FOIP reports that are ‘overdue’ as per the MNR Compliance Inspection Handbook. The ‘overdue’ status currently ranges from 77 days to 1984 days (5yrs, 5mos, 7days) overdue, primarily driven by the turnover of MNR Compliance Inspectors and attention to finalize these reports.

The MNR issued eight Written Warnings and zero Fines during the audit period.

The MNR consistently went to the field throughout the audit period to monitor forest operations and met regularly with the forest industry representatives to discuss compliance trends and worked to resolve operational issues.

Discussion and Conclusion:

A review of the MNR District Compliance Plans during the audit period found that there was an inconsistency in the creation of ACOPs and when created, the results were not consistently recorded. MNR failed to meet the intent of the Forest Compliance Handbook - Inspection, Monitoring and Reporting Procedures (FOR 07 03 05) in relation to Operational Issue Verification as well as compliance monitoring targets identified in the FMP compliance strategy.

The MNR and ADLP have held annual spring meetings to discuss compliance trends from the previous AWS and areas that needed to be worked on for the coming year. The MNR consistently goes to the field throughout the audit period to monitor forest operations. Several times throughout each year both District and ADLP staff held joint site visits to look at problem areas and further investigate solutions to prevent future occurrences.

Finding #1:

MNR does not have a fully completed monitoring plan in accordance with the Compliance Handbook.



Independent Forest Audit –Record of Finding

Finding #2

Regulatory Requirement B: Meeting FMP Objectives

Audit Criterion B.4: Renewal

Procedure:

Assess whether site preparation and regeneration treatments were consistent with the Forest Operations Prescription (FOP); the FOP was consistent with the SGRs; the FOP was certified by an R.P.F., and actual operations were appropriate and effective for the actual site conditions encountered.

Background Information and Summary of Evidence:

The 2023/24 harvest area FALC-4 was visited during the field audit. The SGR (BfDom-Nat) for this block and a map detailing natural regeneration survey plots were provided to the auditors. The site is currently two years post-harvest. The natural regeneration standard was to meet a 1.0 metre height at 5-7 years post-harvest. Very few ingress seedlings were found on the site.



Figure 7: Richment Lowland Spruce FTG

Similarly, auditors visited the Richment free-to-grow area that was harvested in 2005-2007 under a different set of silviculture ground rules (S1-Nat-S1E). This area was part of the backlog FTG assessed through large scale photography and reported as FTG in 2019. As an example, this site is now 18 years post-harvest and would not meet the regeneration standards of the current silviculture ground rules. Many black spruce seedlings were established, but did not meet the 1.0 metre height requirement, as described in SGR Code #26 (SbLowL-Nat).

Discussion and Conclusion:

FALC-4 has a thick shrub and herb layer, with the debris not yet settled. This block does not have the conditions to renew within the timeframe identified in the SGR.

Richment FTG is an example of growth patterns of a SBLow site that could be used to establish appropriate future SGRs.

Finding #2:

Some silviculture ground rules have unrealistic timeframes and height standards for regeneration establishment.

Independent Forest Audit –Record of Finding

Finding #3

Regulatory Requirement B: Meeting FMP Objectives

Audit Criterion B.2: Access

Procedure:

Select a representative sample from those areas where operations have been conducted during the audit period, and for various contractors and for each type of access activity (road construction and/or decommissioning, various types of water crossings – winter, culverts, bridges, low water fords, road maintenance, construction and/or removal) from primary, branch, and operational roads constructed, including forestry aggregate pits for new roads and existing roads.

Assess whether roads have been constructed, maintained, and decommissioned (e.g., removal of a water crossing, site preparation and regeneration of decommissioned roads) to minimize environmental impacts and provide for public and operator safety.

Assess whether the planned maintenance and 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:

Road and Culvert Conditions:

Roads were generally well-maintained, with a minimal footprint, good grading, and smooth surfaces.

One culvert on Box Lake Road (BOXLK-03) was condemned by the MNR due to a large dent and thin fill, requiring replacement. The road was blocked for safety. Inexperienced contractors contributed to poor crossing installation quality.

Junior-1 culvert (1600mm) was a short (9-metre) culvert on a branch road. Rip rap was noted as being large, square pieces of rock, that do not prevent sedimentation.

Bridge Conditions and Monitoring:

Bridges were found to be in good repair, except for the debris noted on the Tape 1A bridge inspection report in 2024. As of the August 2025 field audit, the crew had not yet addressed this issue. ADLP is responsible for annual bridge monitoring, a task that was outsourced to a third party for one year.



Figure 8: Junior-1 Culvert Crossing

Forestry Aggregate Pits

Of the seven forestry aggregate pits observed, two pits (HLR-1, HLR-2) had excavations closer than the required five metres set back from trees.



Figure 9: HLR-1 Forestry Aggregate Pit.

Discussion and Conclusion:

The 2017 IFA included a finding, “The roads and water crossings monitoring program that is outlined in Table FMP-18 of the Phase II FMP had not been followed”. The Forest Access and Monitoring Tracking program (FAMT) was briefly implemented in 2011 but ceased in 2013 when the Sustainable Forestry Licence was surrendered. FAMT was resurrected in 2019/20 by ADLP.

Although monitoring is now occurring, the common turnover of staff and contractors leads to inexperienced contractors, and minimal staff training and supervision, resulting in less than ideal practices.

Finding #3:

Water crossing installation requirements and aggregate pit standards are not being fully followed.

Independent Forest Audit –Record of Finding

Finding #4

Regulatory Requirement B: Meeting FMP Objectives

Audit Criterion B.5: Tending and Protection

Procedure:

Assess whether the tending and protection treatments were consistent with the Forest Operations Prescriptions (FOP); the FOP was consistent with the SGRs; the FOP was certified by an R.P.F., and actual operations were appropriate and effective for the actual site conditions encountered.

Background Information and Summary of Evidence:

No tending has been done on the Ogoki forest during the term of this audit. The helicopter viewing of FTG areas indicated many sites assessed as 'pure' included other species; however, it is difficult to determine what the stand composition was at the time of FTG assessment. Some species were missed typed or not visible (i.e. larch, poplar) during the original assessment.

The 2020-2030 FMP objectives include goals related to the 'Caribou Conservation Plan' and the BLG that identifies mature conifer stands and conifer-dominated lowlands as being critical habitats for rutting, calving, and wintering areas for woodland caribou. The auditors observed hardwood encroachment on regenerating conifer stands. These stands will not meet the definition of a conifer stand without stand tending, and the ability of the FMP to meet these woodland caribou habitat objectives may be compromised as a result.

The 2020-2030 FMP, Table FMP-4: Silvicultural Ground Rules identifies chemical aerial tending as an acceptable alternative treatment. FMP Section 3.2.4 Limitation of Herbicide Use states that areas that need tending will be brought to the First Nations Communities to discuss herbicide or an alternate approach. No herbicide use or tending alternatives have been discussed with the communities. The auditors observed many sites that will require tending to reach the conifer purity identified in the plan.



Figure 10: Natural Regeneration and Competition

Discussion and Conclusion:

First Nations had raised concerns regarding herbicide use during the FMP development. As a result, ADLP has not utilized herbicides for tending. However, no herbicide tending or alternative methods have been discussed with the communities.

The 2020-2030 FMP objectives include goals related to the 'Recovery Strategy for Woodland Caribou'⁴ that identifies mature conifer stands and conifer dominated lowlands as being critical habitats for rutting, calving, and wintering areas for woodland caribou. Stand tending will be essential for reaching these conifer objectives for woodland caribou habitat.

Finding #4:

Without the use of tending, renewal is at risk of not meeting prescribed Silviculture Ground Rule standards and the FMP conifer objectives for woodland caribou habitat.

Independent Forest Audit –Record of Finding

Finding #5

Regulatory Requirement F: Sustainability

Audit Criterion F.3: Assessment of long-term trends

Procedure: Forest sustainability trends in the annual reports for the audit period shall be reviewed for accuracy and analyzed by the auditor. Forest Explorer is an additional source of data to assess trends over time. This audit requirement is not meant to duplicate previous audit requirements and procedures but is meant to provide additional information on long-term trends.

Background Information and Summary of Evidence:



The objectives table in the 2020-2030 FMP followed the 2017 FMPM requirements (Part A, Section 1.2.5.1). A dynamic caribou habitat schedule (DCHS) with a 100-year rotation has been established, causing mature and over-mature stands within C, D, and E blocks (harvest after 2038) to degrade due to natural forest succession. Similarly, the lack of harvest operations (21% of planned over the past 8 years) will add to the overmature nature of the Ogoki forest.

Eventually harvesting will encounter stands with heavier understories of balsam fir and hardwoods where the canopy has naturally opened, resulting in less-than-desirable woodland caribou habitat. This over-mature state will add to the risk of forest fires and the degradation of forest products.

Figure 11: FTG Jack Pine with Hardwood Component

Discussion and Conclusion:

The Ogoki Forest is completely covered with timed mosaic blocks or dynamic caribou habitat schedule; however, it has not been harvested consistently. The distance from processing facilities and the closure of the nearest pulp mill have impacted the harvest pace on the forest. Despite challenges such as mill closures and distance from processing facilities, harvest levels have been maintained, and road building is proceeding. Silviculture establishment seems to be consistent with the planned renewal.

Regardless of efforts and good intentions, the harvest is not at a pace, and the forest will remain in an overmature state. The objective of creating a forest that will meet the habitat needs of the endangered woodland caribou will not be possible without an increase in forest harvesting (i.e. additional markets) or another approach (i.e. forest fire) to reset the forest stand ages.

Finding #5:

The current harvest level is insufficient to achieve the desired forest composition and age-class structure to meet the FMP objectives for the habitat requirements of the woodland caribou.

Independent Forest Audit –Record of Finding

Finding #6

Regulatory Requirement F: Sustainability

Audit Criterion F.3: Assessment of long-term trends

Procedure:

Forest sustainability trends in the annual reports for the audit period shall be reviewed for accuracy and analyzed by the auditor. Forest Explorer is an additional source of data to assess trends over time. This audit requirement is not meant to duplicate previous audit requirements and procedures but is meant to provide additional information on long-term trends.

Background Information and Summary of Evidence:

MNR's Silvicultural Obligation Assessment (SOA) website¹⁴ (Figure 6) shows a large portion of the harvest area (~50%) has initiated a renewal treatment as per the SGR (*yellow*) or has been declared established (FTG) (*green*). During the scope of this audit, about 50% the harvest area has not had renewal treatment initiated (*orange*).

The following (Table 8) shows renewal treatments identified in the Ogoki Annual Report submissions, confirming the SOA with about half the harvested area receiving a renewal treatment.

Year	Actual Plant	Actual Seed	Actual Natural	TOTAL Renewal	Actual Harvest	
Ha						
2024/25	NA	NA	NA	NA	NA	
2023/24	522	0	2,163	2,685	3,281	
2022/23	434	0	237	671	705	
2021/22	0	0	398	398	943	
2020-2030 FMP				3,754	4,929	
2020/21	263	0	347	610	1,694	
2020-2021 CP				610	1,694	
2019 Ext	144	0	431	575	1,720	
2018 Ext	0	0	307	307	2,231	
2017/18	174	0	0	174	40	
2008-2018 FMP				1,056	3,991	
				5,420	10,614	51.1%

Table 8: Annual Report Renewal Treatments

Auditors have been shown GFMI's Silvicultural Obligations Map, spatially identifying harvested areas and subsequent renewal treatments.

GFMI records (Table 9) identify 30.9% of the regeneration backlog is classified as recently harvested areas with renewal treatments planned. The remaining 2,910 ha (27.4%) are older cut areas where renewal treatments have not been initiated.

¹⁴ https://public.tableau.com/app/profile/larlo/viz/Silv_ObligationsDashboard/DB_Overview



Activity	Ha	%
Harvest (Annual Reports)	10,614	
Renewal Initiated (Annual Reports)	4,423	41.7%
Renewal Planned (Recent Harvest)	3,281	30.9%
No Renewal Initiated	2,910	27.4%

Table 9: GFMI Regeneration Backlog

The 2,910 ha of harvest area with no renewal initiated has been determined to have been harvested in 2018-2020. The forest units (FU) are 58% conifer (PjPur, PjDom, SbDom, SpUp), 12% lowlands (Slow1, Slow3), 12% mixed conifer (CoMx1, CoMx2), and 1% hardwood (HwdMx). A large portion of this area was on winter access roads, making access questionable. Some of these areas have already been scheduled for surveys to determine appropriate renewal treatments

Discussion and Conclusion:

MNR's SOA is only a tool to visually represent the Annual Report submitted data. However, based on actual GIS data provided by GFMI, there seems to be a portion of older harvested areas (2,910 Ha) where renewal treatments have not been initiated.

The Ogoki has difficulty in soliciting and maintaining contractors to carry out silviculture activities due to the smaller programs and long travel distances. Tender packages for mechanical site preparation (MSIP), tree planting and slash piling are sent to all suitable contractors annually. Not all will provide a bid, or some bids are contingent on being awarded work on the neighbouring Kenogami Forest. Several awarded contracts have not been carried out and forwarded to the next years.

Finding #6:

Renewal treatments have not been initiated on areas harvested in 2018-2020.

dependent Forest Audit – Record of Finding

Best Management Practice #1

Regulatory Requirement E: Licence

Audit Criterion E.1: Forest Resource Licence (FRL), Forestry Agreement

Procedure:

Review terms and conditions as set out in SFL, APFA, FRL, and any Forestry Agreements and assess FM's compliance with these terms and conditions. The audit report will include a discussion of how the FM has met the terms and conditions of the applicable agreement.

Background Information and Summary of Evidence:

In 2023, two large forest fires occurred in the Ogoki Forest, consuming 30,006 ha in the Reckett Road area and 10,183 ha in the Heart Lake Road area. ADLP was approached by Integrity Reforestation¹⁵ who created a coalition of partners to help restore these burnt areas. Integrity works with partners on alternative reforestation funding sources to allow for tree planting to occur on a large portion of these fires. Approximately 3.65 million seedlings are being grown to plant on suitable sites of these burnt areas. Tree planting of jack pine, black spruce and white spruce is scheduled to begin in 2025 on the Ogoki Forest.

Integrity Reforestation has secured funding support to grow the following seedlings to regenerate suitable locations of these burns.

2025

- Forests Canada – 700,000 trees
- Trees Canada – 700,000 trees
- NRCAN – 751,000 trees
(This includes some contributions from Arbor Day and a few small corporate partners)

2026

- Forests Canada – 500,000 trees
- Trees Canada – 500,000 trees
- Unfunded – 500,000 trees

Discussion and Conclusion:

Integrity Reforestation is working with Agoke Development Limited Partnership to plant 3,560,000 trees with financial support from Forests Canada, Tree Canada, Natural Resources Canada and the Arbor Day Foundation.

Best Management Practice #1:

Engaging alternative reforestation funding sources to improve the forest resource.

¹⁵ <https://www.integrity-reforestation.com/wildfire>



Appendix 2: Management Objectives Assessment

The following is taken from table AR-16 (Assessment of Objective Achievement) in the 2008-2020 Ogoki Forest Enhance Annual Report.

Indicator	Auditors Assessment	Auditor Comments
2008-2020 FMP Objectives		
1.1.1 Frequency distribution of forest disturbances by size class	Not Achieved	Many small patches (<200ha). Larger patches not achieved by plan end.
1.1.2 Number of large (>8,000 ha) contiguous forest patches	Achieved	Three large patches were maintained.
1.2.1 Percent of Caribou blocks greater than or equal to 10,000 ha in size.	Achieved	Assessed at LTMD, the desirable level and associated target was achieved. The current caribou mosaic, as planned over the long-term, maximizes the proportion of blocks greater than or equal to 10,000 ha.
1.2.2 Caribou on-line habitat	Achieved	The target of 40% desired caribou habitat by 2108 achieved in forest model. Current reduced harvesting levels may impact future achievement.
1.3.1 Percent marten suitable habitat	Achieved	The desirable levels of 10-20% suitable marten habitat achieved in forest model over the next 100 years.
1.4.1 Area of habitat for forest dependent provincially and locally featured species and species at risk habitat in Ontario	Achieved	The desirable habitat levels and associated targets were achieved in forest model for the selected wildlife species over next 100 years
1.5.1 Area of available young forest (0-50 years) by forest unit.	Achieved	The desirable levels and associated targets are achieved in forest model over the next 100 years.
1.5.2 Area of available mature forest (51 years – old growth onset age) by forest unit	Achieved	The desirable levels and associated targets are achieved in forest model over the next 100 years.
1.5.3 Area of available forest by forest unit	Achieved	The desirable levels and associated targets are achieved in the forest model over the next 100 years.
1.5.4 Area of minor forest types.	Achieved	A target of 401 Ha of white spruce and spruce mixedwood working groups by the end of plan was achieved (457 ha).

Indicator	Auditors Assessment	Auditor Comments
2008-2020 FMP Objectives		
1.6.1 Amount of old growth by forest unit.	Achieved	The Ogoki Forest has plenty of old growth at plan start. There is an overall decrease in the amount of old growth area on the Ogoki Forest when comparing plan start levels to long-term levels. Desirable levels are maintained.
2.1.1 Kilometres of road per square kilometre of Crown managed forest within the unrestricted geographic area.	Not Achieved.	The desirable target level (0.05 km/km ²) has not been met, the kilometre of road per square kilometre (0.07 km/km ²) of Crown managed forest was slightly higher than the target. The road density is very low compared to other forests. This is not a concern
2.1.2 Road density on Crown managed forest	Achieved	The desirable target of <1% drivable primary, branch and operational roads was achieved at plan end (0.3%)
3.1.1 Percent of harvested forest area assessed as successfully regenerated.	Achieved	The desirable target of 95% successfully regeneration based on the large area that was surveyed in 2018.
4.1.1 Percent of annual forest operations inspections in compliance.	Achieved	As of 2021 a target of 95% of all annual forest operations inspections are in compliance with operations prescriptions was achieved at 100%. No forest operations inspections categorized as “significant” non-compliance by MNR.
4.1.2 Percent of annual forest operations inspections in compliance with prescriptions developed for the protection of natural resource features, land uses or values dependent on forest cover	Achieved	As of 2021 a target of 95% of all annual forest operations inspections in compliance with AOC prescriptions developed for the protection of natural resource features, land uses or values dependent on forest cover was achieved at 99%.

Indicator	Auditors Assessment	Auditor Comments
2008-2020 FMP Objectives		
4.1.3 Percent of annual forest operations inspections in compliance with prescriptions developed for the protection of resource-based tourism values.	Achieved	100% of the reports have been in-compliance throughout the forest management plan period.
4.1.4 Percent of annual forest operations inspections in compliance with management practices that prevent, minimize or mitigate site damage	Achieved	100% of the reports have been in-compliance throughout the forest management plan period.
4.1.5 Percent of annual forest operations inspections in compliance with prescriptions developed for the protection of water quality and fish habitat	Achieved	100% of the reports have been in-compliance throughout the forest management plan period.
4.1.6 Percent of annual forest operations inspections in compliance with prescriptions developed for the protection of known cultural heritage value(s) (identified and mapped).	Achieved	100% of the reports have been in-compliance throughout the forest management plan period.
5.1.1 Long-term projected available harvest area (by species group).	Achieved	The desirable level and associated target were achieved in the forest model in 100 years.
5.1.2 Long-term projected available harvest volume (m ³), by species group.	Achieved	The volumes are being maximized but continue to decline over the long-term (100yrs)
5.1.3 Available, actual and forecast harvest area, by forest unit	Achieved	This target was adjusted for the 11-year term of the plan. The desirable levels and targets were met for the forest unit poplar pure, and were close to being met for hardwood mix, pure jack pine and spruce low.
5.1.4 Available, actual and forecast harvest volume, by forest unit	Partially Achieved	The totals for most species were met but not by Pj, Ce, and Po species. The planned harvest volume was not compromised This is not a concern.

Indicator	Auditors Assessment	Auditor Comments
2008-2020 FMP Objectives		
5.1.5 Percent of forecast volume utilized, by mill	Not Achieved	The desirable levels and targets were not met at the end of the plan period. The economic downturn and the distance to facilities are a distinct factor in the utilization of available volume. This is not a concern as the volume will be held for future utilization.
6.1.1 Managed Crown productive forest available for timber production	Achieved	The projected Crown productive forest area available for timber production does not decrease over the 100-year planning horizon.

The following is taken from table FMP-10 (Assessment of Objective Achievement) in the 2020-2030 Ogoki Forest FMP

Indicator	Auditors Assessment	Auditor Comments
2020-2030 FMP Objectives		
1.1 Habitat for forest dwelling woodland caribou within local population ranges.	Achieved	The 100-year target of 688,132 ha is achieved with 693,216 ha of refuge habitat. The winter use and preferred habitat is also achieved with 560,049 ha being above the target of 498,087 ha.
1.2 Texture and arrangement of caribou refuge habitat for forest dwelling woodland caribou on the Ogoki Forest as measured by Ontario Landscape Tool (OLT).	Achieved	The planned forest management activities in the FMP have little influence on this indicator given the DCHS and short timeframe. Texture is a spatial driven variable, the DCHS is a spatial pattern enforced on the landscape. The planning and operations can only influence the composition of the patches and not texture.



Indicator	Auditors Assessment	Auditor Comments
2020-2030 FMP Objectives		
1.3 Texture and arrangement of caribou winter habitat (used and preferred) for forest dwelling woodland caribou on the Ogoki Forest as measured by OLT.	Not Achieved	Assessed at LTMD, the forest texture and arrangement moved slightly toward and slightly away from the target range during the modelling and after operational planning. This indicator is influenced by the DCHS and cannot be significantly influenced within the plan timeframe. This is not a concern.
1.4 To create large forest patches of similar age for forest dwelling woodland caribou habitat in the Ogoki forest.	Achieved	All AB and B blocks were allocated within constraints.
1.5 To create/maintain a suitable supply and arrangement of large forest patches of forest area in an average condition of at least 60 years within the caribou distribution range, through the retention and harvest of DCHS blocks through time as illustrated on 20-year time slice maps.	Achieved	Due to the lack of harvesting on the Forest during the 2008-2018 FMP, the amount of habitat at plan start is high, and as forest operations progress over the short, medium and long terms the forest condition is projected to maintain the target of at least 40%.
2.1 Forest Structure and Composition: total area of crown productive forest by landscape class.	Achieved	The target is to move landscape units towards the interquartile ranges in the short term. Three of the four landscape units move towards or stay within the desired level. Only one moves away from the target in the short term but towards it in the medium and long term, which is acceptable to the planning team.
2.2 Amount and distribution of old growth forest: total area of old growth crown productive forest by forest unit group	Partially Achieved	Attained for the conifers in all terms. Whereas hardwoods move away from target in the short and medium but towards the target in the long term. The planning team did their best to influence the achievement. This is not a concern.

Indicator	Auditors Assessment	Auditor Comments
2020-2030 FMP Objectives		
2.3 Upland conifer forest: total area of crown productive forest (all ages) in spruce and pine dominated forest units.	Not Achieved	The planning team did their best to move into the interquartile range however the scoping of options indicated there was little the planning team could do to significantly influence this objective. This is not a concern.
2.4 Young Forest: total area of crown productive forest less than 36 years in age (all forest units).	Achieved	LTMD projections show that young forest levels will be maintained within the interquartile range over the short, medium and long term and the target is achieved.
2.5 Natural Landscape Patterns – texture of mature and old forest – frequency distribution of mature and old forest by concentrated class as measured by OLT.	Achieved	The timing of the DCHS blocks and to a certain degree the forest composition within the blocks determines texture of mature and old forest. It is not significantly influenced by planning.
2.6 Natural Landscape Patterns – young forest patch size – frequency distribution of young forest patch by patch size classes as measured by OLT.	Achieved	The planning team measured movement away from and toward the target. The planning did not significantly influence this indicator.
3.1 Long term projected available harvest area by Forest Unit	Achieved	There is no change in available harvest area.
3.2 Long-term projected available harvest volume by species group	Achieved	Projected available harvest volumes have been maximized over the long term
3.3 Long-term projected available harvest volume by broad size or product group.	Achieved	There was limited ability to alter the available volumes to meet the industrial demand due to the application of the DCHS. An assessment at the completion of operational planning showed no change from the LTMD.
4.1 Actual Harvest area, by Forest Units (% of planned harvest area)	Partially Achieved at IFA Audit	To be assessed at plan end. At the time of the field audit, 20.7% of the planned harvest had been cut after 5 years of implementation.

Indicator	Auditors Assessment	Auditor Comments
2020-2030 FMP Objectives		
4.2 Actual harvest volume, by species group. (% of planned harvest volume)	Partially Achieved at IFA Audit	To be assessed at plan end. At the time of the field audit, 23.9% of the planned volume had been harvested after 5 years of implementation.
5.1 Managed Crown productive forest available for timber production	NA	To be assessed at plan end.
5.2 Kilometre of roads that will be used for forest management purposes per square Kilometre of Crown Forest.	Not assessed	No target was set for this objective in FMP-10. The FMP text states the target is to increase the road density. The plan start density is 0.106 km/km ² .
6.1 Percent of harvested forest area assessed as successfully established by forest unit	Not assessed	No target was set for this objective in FMP-10. The FMP text target is 100%
6.2 Planned and actual % of harvest area treated by silviculture strata.	Not assessed	No target was set for this objective in FMP-10. The plan text (pg114) does not explicitly have targets for each stratum. Target was to be determined during operational planning
6.3 Planned and actual percent of area successfully regenerated to the target forest unit by forest unit over the entire forest	Not assessed	No target was set for this objective in FMP-10. FMP Text target is within 5% of the post-harvest renewal transition rules. FMP-5.
6.4 To maintain the amount of conifer species (Pi, Sb, Sw) in the conifer dominated forest units of crown productive forest within DCHS blocks based on pre-harvest levels.	Not assessed	No target was set for this objective in FMP-10. FMP Text states the target is to be within 5% of plan start.
6.5 Percent of forest area harvested under previous FMPs that is assessed as successfully regenerated in accordance with the regeneration standards of the corresponding FMP	Not assessed	No target was set for this objective in FMP-10. FMP text states the target is 100% renewal to the regeneration standard.
FMP 7.1 Percent of forest operations in non-compliance, by activity and remedy type	Not assessed	No target was set for this objective in FMP-10. FMP text states 95% compliance.



Indicator	Auditors Assessment	Auditor Comments
2020-2030 FMP Objectives		
7.2 Compliance with management practices that prevent, minimize or mitigate site damage (% of inspection in non-compliance, by remedy type)	Not assessed	No target was set for this objective in FMP-10. FMP text states 95% compliance.
7.3 Compliance with management practices that protect water quality and fish habitat (% of inspection in non-compliance, by remedy type)	Not assessed	No target was set for this objective in FMP-10. FMP text states 95% compliance.
8.1.1 Provide opportunity for involvement of First Nation and Métis communities through planning team representation.	Achieved	Marten Falls, Eabametoong, Animbiigoo Zaagi'igan Anishinaabek and Aroland First Nation have representatives on the planning team.
8.1.2 Consultation with communities six months prior to commencement of the formal public consultation process for the preparation of the FMP.	Achieved	All communities were given the opportunity to develop a custom consultation approach, designate a planning team representative and update values information.
8.1.3 Provide opportunity to participate in the Desired Forest & Benefits Meeting at each First Nation Community as requested.	Achieved	A Desired Forest & Benefits Meeting occurred in the communities of Marten Falls, Eabametoong, and Animbiigoo Zaagi'igan.
8.1.4 Provide opportunity to participate at proposed Long Term Management Direction & Preliminary Determination of Sustainability Meeting at each First Nation Community as requested.	Achieved	Notices for the development of the Long-Term Management Direction were sent out to First Nation communities in July 2019. An offer was made to present LTMD to the First Nation communities.
8.1.5 Provide First Nations communities opportunities to identify Aboriginal values	Achieved	All First Nation communities have been provided the opportunity to review and update the First Nation Background Information Report.
8.1.6 Provide opportunity to First Nation and Métis communities to host a community-specific Information Centre on Review of Proposed Operations as requested.	Achieved at IFA Audit	To be assessed following the completion of the Information Centre on Review of Proposed Operations. This was not updated in the FMP final text. First Nations were given the opportunity to have community specific Information Centres.

Indicator	Auditors Assessment	Auditor Comments
2020-2030 FMP Objectives		
8.1.7 Provide opportunity to First Nation and Métis communities to host a community-specific Information Centre on Review of Draft FMP as requested.	Achieved at IFA Audit	To be assessed following the completion of the Information Centre on Review of Draft FMP. This was not updated in the FMP final text. First Nations have been given the opportunity to have community specific Information Centres.
8.2.1 Provide notice of FMP development and opportunities for involvement. (Trappers)	Achieved	All trappers were sent notice of commencement of the 2020-2030 Ogoki FMP October 4, 2017.
8.2.2 FMP Information available at First Nation communities and MNR offices throughout plan development.	Achieved	Documentation was made available to First Nation communities and was available at the MNR office.
8.2.3 Opportunity to meet with a Planning Team Representative from the Community and/or LCC.	Achieved	Letters were sent to all trappers.
8.2.4 Provide notice regarding planned Annual Work Schedule activities prior to AWS implementation.	Achieved at IFA Audit	To be assessed as the plan is implemented. Notice of AWS activities provide prior top implementation
8.3.1 Local Citizens Committee members' self-evaluation of their effectiveness in plan development	Achieved	Surveys were compiled and supplied to the planning team. The desired satisfaction was 100% and the target was 75%. This percentage was achieved.
8.4.1 Resource Based Tourism mailout prior to Invitation to participate.	Achieved	Resource Based Tourism operators were provided with a mailout prior to Invitation to participate.
8.4.2 Resource Based Tourism mail out prior to LTMD.	Achieved	Resource Based Tourism operators were provided with plan development information.
8.4.3 Provide notice regarding planned Annual Work Schedule activities prior to AWS implementation.	Achieved at IFA Audit	To be assessed as the plan is implemented. Notice of AWS activities provide prior top implementation

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 early years of the audit scope.
Wood supply commitments, MOAs, sharing arrangements, special conditions	<p>The Ogoki Forest has one wood supply agreement (#536261) with AV Terrace Bay (which is permanently closed). There is a business arrangement with Nakina Lumber for sawlogs, and a crown commitment of veneer poplar to Levesque Plywood Limited (wholly owned by Columbia Forest Products).</p> <p>Currently, there are little to no markets for hardwood or small diameter conifer from the forest.</p>
Preparation of FMP, AWS and reports; abiding by the FMP and all other requirements of the FMPM and CFSA	The MNR, ADLP and GFMI 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, ADLP and GFMI conducted the required surveys and submitted all the data consistent with FIM requirements.
Wasteful practices not to be committed	<p>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.</p> <p>There was no evidence found of wasteful practices.</p>
Natural disturbance and salvage conditions must be followed	A total of 46,902 hectares was burnt and reported in the Annual Reports. Due to the intensity of the fires, no salvage harvesting took place.
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	During the scope of this audit, there were no withdrawals from the licence area
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.



Licence Condition	Licence Holder Performance
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	The requirements for meeting minimum balance were met each year.
Silviculture standards and assessment program	The assessment of FTG was behind at the last audit, however due to a focus on catching up on assessment. It is now thought to be current (10 years post-harvest).
First Nations and Métis opportunities	<p>First Nations were actively engaged in the preparation of the FMP and annual operations were shared with local First Nations.</p> <p>Aroland F.N., Eabametoong F.N., and Marten Falls F.N. are owners of Agoke Development Limited Partnership, which holds the Forestry Agreement to manage the Ogoki Forest.</p>
Preparation of compliance plan	The Annual Compliance Operation Plans have not been completed annually. The FMP included a detailed compliance strategy for the 2020-2030 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.
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 (CFSA), 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 (IFAPP) provide 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 to identify areas of anomalies for review. The Risk assessment report was submitted to the Forestry Futures Trust Committee and MNR Divisional Support Branch for review and approved on June 11, 2025.

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 ADLP, MNR Nipigon Geraldton District, MNR Northwest Region Office, the MNR Divisional Support Branch, and the Forestry Futures Trust Committee on June 27, 2025. The audit plan was provided to the GANRAC, First Nations communities, and wood fibre receiving mills on July 1, 2025.

Public Notices: Public input was solicited through print notices – Wawatay News (online), The Geraldton Times Star, The Chronicle Journal (Thunder Bay), MNR social media accounts (X, Facebook), and the Municipality of Greenstone – Community News website & Facebook. No public comments were received.

All Indigenous communities with an interest in the Ogoki Forest were contacted by email and invited to participate or provide input in the audit. Three communities took part in the field audit. The Indigenous communities will also be given the opportunity of a confidential presentation of the draft audit findings in October 2025.

Two GANRAC members were involved in the field audit and were interviewed. They gave feedback on the forest management planning and operations process, the communication with the Auditees and their perceived impact. The GANRAC will also be given a confidential presentation of the draft audit findings in October 2025.

All recipients of wood from the Ogoki Forest were contacted by email. No concerns were received.

Field Site Selection: GFMI 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 IFAPP. The field sample was reviewed by the FM and MNR district during a virtual meeting in June 2025.

Site Audit: The site audit was conducted the week of August 11-14, 2025. The auditors were divided into three teams for truck audits each day. On day three, one team member conducted the aerial reconnaissance of silviculture surveys and inaccessible sites with a representative from GFMI and MNR. Table 10 identifies the sample size selected for field assessment to meet the minimum 10% sample of activities that occurred on the Ogoki Forest during the audit period.



Activities	Audit Scope Hectares	Proposed Sample Size	Actual Sample Size	Actual Sample Intensity
Harvest – clearcut	13,027	1,600	1,531	11.8%
Site Prep – mechanical	798	110	110	13.8%
Site Prep – chemical	0	0	0	NA
Tree Planting	1,968	568	568	28.9%
Seeding	0	0	0	NA
Natural Regeneration	3,873	508	508	13.1%
Manual Tending	0	0	0	NA
Chemical Tending Air	0	0	0	NA
Chemical Ground	0	0	0	NA
Regeneration Assessment (FTG)	55,836	5,731	5,731	10.3%
		Sample # or KM		
Road Construction	47	Box Lk (4.2) Dog Lk (4.8)	Box Lk (4.2) Dog Lk (4.8)	18.9%
Road Decommissioning	0	0	0	NA
Water Crossings New	31	5	5	16.1%
Water Crossing Decommissioning (not ice)	13	2	2	15.3%
Aggregate Pits – open	44	5	6	13.6%
Aggregate pits – closed	5	1	1	20.0%

Table 10: Field Audit Sampling Intensity

The following (Table 11) identifies the IFA sample size of the silviculture activities that were charged to the Forest Renewal Trust in the 2023/24 and assessed as part of the Specified Procedures Audit.

Activity	2023/24 Hectares	Proposed Sample Size	Actual Sample Size	Actual Sample Intensity
Harvest – clearcut	3,281	460	460	14.0%
Site Prep – mechanical	388	53	53	13.7%
Site Prep – chemical	0	0	0	NA
Tree Planting	522	135	135	25.8%
Seeding	0	0	0	NA
Natural Regeneration	2,163	291	291	13.5%
Manual Tending	0	0	0	NA
Chemical Tending Air	0	0	0	NA
Chemical Ground	0	0	0	NA
Regeneration Assessment (FTG)	0	0	0	NA

Table 11: Field Audit Sampling Intensity for 2023/24 Specified Procedures



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.

The field audit closing meeting was held on August 28, 2025.

GANRAC and local First Nations were provided an overview of findings on October 8, 2025.

The draft final audit report was provided on September 28, 2025, with the final version submitted October 28, 2025.

Summary of Consultation and Input to the Audit Team

Input was solicited from public stakeholders, local First Nations communities, the Local Citizens Committee members, Overlapping Agreement/Licence holders, and MNR and Forest Manager staff through direct emails, newspaper ads, posters, and use of social media. The following summarizes comments received:

The development of the Forest Management Plan is a long and onerous process, and was not without its issues: the Forest Resource Inventory (FRI) provided by the MNR required a lot of updates and corrections, there was a huge learning curve for Planning Team members who don't work in the industry, the BLG targets was based on a different forest resource inventory, and two plan extensions and a contingency plan were required.

The limited harvesting over the past several years required adaptation of the Dynamic Caribou Habitat Schedule, as the forest becomes more mature to overmature.

A strong local opposition to the use of herbicides limited renewal prescription opportunities. There are concerns with hardwood creeping into conifer areas, and the 'veneer' only harvest is promoting poplar suckering. Similarly, there is more balsam fir in the understory as overmature stands start to naturally break down.

The Geraldton Area Natural Resources Advisory Committee (GANRAC) is very well engaged. However, meetings are usually 'death by power point' and difficult to sit through. It is time to rejuvenate the membership.

There is concern with the forest industry monitoring their own compliance, although MNR does verify compliance. The Management Foresters are seasoned veterans and can navigate issues.

Harvesting is moving to a cut-to-length system to leave more slash and natural seed sources in the cut over, but there remains a concern that more natural regeneration is taking place and how effective it will be.

MNR, ADLP and GFMI are working to train contractors, as currently there is a lack of experience in water crossing construction.

Appendix 5: List of Acronyms

The following acronyms may have been used in this document.

ADLP	Agoke Development Limited Partnership
AFN	Aroland First Nation
AOC	Area of Concern
AR	Annual Report
AWS	Annual Work Schedule
AZA	Animbiigoo Zaagi'igan Anishinaabek First Nation
B.Sc.F.	Bachelor of Science in Forestry
BLG	Forest Management Guide for Boreal Landscapes
CFSA	Crown Forest Sustainability Act
CMU	Crown Management Units
CRO	Conditions on Regular Operations
DCHS	Dynamic Caribou Habitat Schedule
EFN	Eabametoong First Nation
FRI	Forest Resource Inventory
FA	Forestry Agreement
FAMT	Forest Access Management Tracking
FFTC	Forestry Futures Trust Committee
FIM	Forest Information Manual
FM	Forest Manager
FMP	Forest Management Plan
FMPM	Forest Management Planning Manual
FOIP	Forest Operations Information Program
FOP	Forest Operations Prescription
FRT	Forest Renewal Trust
FTG	Free-to-grow
FU	Forest Unit
GANRAC	Geraldton Area Natural Resources Advisory Committee
GFMI	GreenForest Management Inc.
GFN	Ginoogaming First Nation
Ha	Hectare
IFA	Independent Forest Audit
IFAPP	Independent Forest Audit Process and Protocol
Km	Kilometre
LCC	Local Citizens Committee
LL58	Long Lake #58 First Nation
LTMD	Long -Term Management Direction
MFFN	Marten Falls First Nation
MNR	Ministry of Natural Resources
M ³	Cubic Metres
MSIP	Mechanical Site Preparation
NMm ³	Net Merchantable Cubic Metres
OLT	Ontario Landscape Tool
R.P.F.	Registered Professional Forester
RSA	Resource Stewardship Agreement

SAP	Supplemental Aerial Photograph
SAR	Species at Risk
SFL	Sustainable Forest Licence
SGR	Silviculture Ground Rule
SOA	Silviculture Obligation Assessment
WFN	Whites and First Nation
WSA	Wood Supply Agreement



Appendix 6: Audit Team Members and Qualifications

Name	Role	Responsibility	Credentials
Dave Legg	Lead Auditor Forest Management Planning Field Audit Harvest, Access and Renewal	Audit Management and Coordination Liaison with FM, MNR & FFTC. Planning and public participation. Review the function of the LCC. Review Forest Management Plan production and review and inspect harvest and silviculture practices Review of operational compliance to AOC implementation Review and inspect harvest and silvicultural practices	B.Sc. Forestry 30+ year career 3 years IFA auditing
Janet Lane, R.P.F.	Assessment of Achievement of Forest Management Objectives Field Audit Harvest, Access and Renewal	Review documentation and practices related to forest management Review and inspect harvest and silvicultural practices Review of operational compliance to AOC implementation Determination of Objective Achievement Determination of Sustainability	B.Sc. Forestry 30+ year career 3 years IFA auditing
Jack Harrison, R.P.F.	Forest Compliance Monitoring Field Audit Harvest, Access and Renewal	Review and inspect the documentation related to contractual compliance. Review of the planning and delivery of the operational compliance program Review of operational compliance to AOC implementation Review and inspect harvest and silvicultural practices Aerial sampling of renewal success	B.Sc. Forestry Certified Compliance Inspector 30+ year career 4 years IFA auditing

