



NorthWinds Environmental Services



## Romeo Malette Forest 2025 Independent Forest Audit

April 1, 2019 to March 31, 2025

December 23, 2025

**PREPARED BY**

**NorthWinds Environmental Services**

King's Printer for Ontario, 2025

*Cette publication hautement spécialisée (Independent Forest Audit Report – Romeo Malette Forest 2019-2025) 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 au [NRISC@ontario.ca](mailto:NRISC@ontario.ca)*

## CONTENTS

---

Executive Summary.....	4
Introduction .....	7
Audit process.....	7
Management Unit Description.....	8
Audit Findings and Best Practices .....	11
Regulatory Requirement A: Compliance.....	11
Regulatory Requirement B: Meeting FMP Objectives .....	12
Regulatory Requirement C: Planned Versus Actual.....	18
Regulatory Requirement D: Action Plan .....	23
Regulatory Requirement E: Licence .....	23
Regulatory Requirement F: Sustainability.....	24
Appendix 1. Audit Findings and Best Practices.....	27
Appendix 2: Assessment of achievement of management objectives.....	39
Appendix 3. Compliance with contractual obligations .....	52
Appendix 4. Audit Process .....	54
Requirement for Independent Forest Audits.....	54
Audit Plan and Site Selection .....	54
Appendix 5 List of Acronyms.....	58
Appendix 6. Audit Team Members and Qualifications.....	60

### List of Figures

Figure 1. Map of the Romeo Malette Forest. ....	10
Figure 2. Average herbicide use in kg/ha from 2019-2024 (Source: Annual Reports).....	17
Figure 3. Public notice map.....	56

### List of Tables

Table 1. Romeo Malette 2025 Independent Forest Audit findings.....	5
Table 2. Wood allocations from the Romeo Malette Forest. ....	9
Table 3. FMP Planned harvest vs actual harvest in the Forest by area and volume for the period April 1, 2019 to March 31, 2024 (no data available for April 1, 2024 - March 31, 2025). ....	14

*Romeo Malette Independent Forest Audit 2025*

Table 4. Annualized planned vs annualized actual regeneration Romeo Malette Forest (April 1, 2019 to March 31, 2025) ..... 15

Table 5. Annualized planned vs annualized actual site preparation on the Romeo Malette Forest (April 1, 2019 to March 31, 2025)..... 16

Table 6. Annualized planned vs annualized actual tending on the Romeo Malette Forest..... 16

Table 7. Compliance inspection report submission dates..... 19

Table 8. Free-to -Grow percent by Free-to-Grow Forest unit. .... 22

Table 10. Field audit site selection representing a minimum of 10% of all activities. .... 55

Table 11. Audit sample of FRT-funded activities from 2023-2024 Specified Procedures Report.55

## EXECUTIVE SUMMARY

---

In Ontario, Independent Forest Audits are carried out every 10-12 years to assess Sustainable Forest Licence holder and Ministry of Natural Resources compliance with *Ontario Regulation 319/20 (Independent Forest Audits)* under the *Crown Forest Sustainability Act (S.O. 1994, c. 25)*. The audits also assess the effectiveness of forest management activities in meeting the objectives set out in the applicable Forest Management Plan. Independent Forest Audits provide feedback on forest management that can be used to improve Crown Forest management in Ontario as part of an adaptive management approach. The 2025 audit of the Romeo Malette Forest was carried out by NorthWinds Environmental Services, a forestry and environmental services firm based out of Thunder Bay, Ontario.

The Romeo Malette Forest is located within the Ministry of Natural Resources Northeast Region, Timmins District. GreenFirst Forest Products (QC) Inc. is the Sustainable Forest Licence holder for the Forest. These two entities ensure that forest management activities are carried out according to the approved forest management plan and applicable guides, legislation and regulations. The audit term was April 1, 2019, to March 31, 2025. Within scope of the audit was:

- Implementation of Years 1-6 of the 2019-2029 Romeo Malette Forest Management Plan

Three out of four recommendations from the most recent 2019 Independent Forest Audit were resolved, and one was carried forward in the 2025 audit findings. Inconsistencies in silviculture survey results between the SFL holder's free-to-grow program and the Northeast Region Ministry of Natural Resources Silviculture Effectiveness Monitoring program remain unresolved (Finding #6a).

Overall, the audit team found that forest management activities on the Romeo Malette Forest were generally conducted well and in accordance with the forest management plan during the audit term. The findings to be addressed by GreenFirst and/or the Ministry of Natural Resources are summarized in Henrike Burkhardt, R.P.F. Lead Auditor Seal

Table 1. Some are minor administrative issues, and some are more substantive findings that may need to be addressed in the next planning cycle (e.g. potential loss of productive land, lack of alignment on silviculture success monitoring).



Henrike Burkhardt, R.P.F. Lead Auditor



Seal

**Table 1. Romeo Malette 2025 Independent Forest Audit findings.**

<b>Concluding Statement</b>	The audit team concludes that management of the Romeo Malette Forest was generally in compliance with the legislation, regulations, and policies that were in effect during the term covered by the audit, and the forest was managed in compliance with the terms and conditions of the Sustainable Forest Licence held by GreenFirst Forest Products (QC) Inc., No. 550398. The forest is being managed consistently with the principles of sustainable forest management, as assessed through the Independent Forest Audit Process and Protocol.
<b>Findings</b>	
1	The current level of Crown road density in km/km <sup>2</sup> exceeded the FMP target level by more than the 10% variance allowed.
2	The loss of productive forest land from roads, landings and slash exceeded the Forest Management Plan modeling assumption of 3.12%.
3	The Ministry of Natural Resources' forest protection program was effective in mitigating budworm damage in target stands, however, not all stands treated met the selection criteria.
4	Compliance reporting timelines in Forest Operations Inspection Program reporting were not consistently met by the Ministry of Natural Resources and the Sustainable Forest Licence holder.
5	The FMP objective target of having >90% of the area assessed declared as free-to-grow by forest unit was not met.
6a	There continues to be a lack of alignment between the Sustainable Forest Licence holder's and Ministry of Natural Resources' free-to-grow survey results.
6b	There are currently no provincial policies dictating a required method or standard by which to evaluate the Sustainable Forest Licence holder's regeneration assessment results.
<b>Best Practices</b>	
1	The District Manager's engagement with the Local Citizens Committee is a best practice that acknowledges the important role of public participation in forest management on Crown Lands.
2	The Sustainable Forest Licence holder's pro-active approach to stakeholder engagement on the Forest is a best practice.

## INTRODUCTION

---

### AUDIT PROCESS

Independent Forest Audits (IFAs) are a requirement of the *Crown Forest Sustainability Act* (S.O. 1994, c. 25) (CFSA) and Ontario Regulation 319/20. Every forest management unit in Ontario is required by law to be audited by an independent audit team every ten to twelve years. The intent is to audit the sustainable management of Ontario's forests and to verify the management of public forests meets social, economic and environmental needs of present and future generations. IFAs provide the people of Ontario with an assessment of how well the audited forests are being managed.

IFAs assess both Sustainable Forest Licence (SFL) holders and the Ministry of Natural Resources' (MNR) compliance with the Forest Management Planning Manual (FMPM) and the CFSA in conducting forest management planning, operations, monitoring and reporting activities. The audit also assesses the effectiveness of forest management activities in meeting the objectives set out in the Forest Management Plan (FMP). The key source of direction for conducting an IFA comes from the Independent Forest Audit Process and Protocol (IFAPP)<sup>1</sup>.

IFAs evaluate forest management against six categories of regulatory requirements, as described in the 2025 IFAPP:

- A. Compliance
- B. Meeting FMP objectives
- C. Planned versus actual
- D. Action plan
- E. Licence
- F. Sustainability

The IFAPP includes a set of audit protocols that are designed to provide a systematic review of the forest management and operational activities in Ontario forest management units. 'Findings' arise from audit team observations of material non-conformances and the identification of situations in which there is a significant or systemic lack of effectiveness in forest management activities. Similarly, the audit team may highlight best practices for the cases where auditees' actions go above and beyond legal requirements and result in positive outcomes for forest and communities. The audit reports and action plans to address the findings are published on the Ontario Government website. Progress toward the completion of actions will be reported on in Annual Reports available through the Natural Resources Information Portal (NRIP).

On the Romeo Malette Forest, the auditees include: the SFL holder (GreenFirst Forest Products (QC) Inc.), Timmins District MNR, Northeast Region MNR and Corporate MNR. The 2025 IFA for the Romeo Malette Forest covered the six-year period from April 1, 2019, to March 31, 2025. The audit was led by NorthWinds Environmental Services, a forestry and environmental

---

<sup>1</sup> Independent forest audit process and protocol. 2025. Copyright ©Kings Printer.

services firm based out of Thunder Bay, Ontario. The audit team members, their roles and qualifications are described in Appendix 5.

At the onset of the audit, the audit team conducted a forest management unit risk assessment to determine if any additional work was required by the audit team. The risk assessment identified one issue: the timing of the audit in year six of a 10-year plan meant there was no Enhanced Annual Report available (generally prepared in year seven) to inform an assessment of planned versus actual management activities and trends on the Forest.

The audit team also reviewed the previous IFA reports, their associated action plans, and the action plan status reports as described in the Annual Reports for the management unit. Findings 1, 3 and 4 from the 2019 audit were resolved, while a finding related to the MNR Silviculture Effectiveness Monitoring Program was carried forward in the 2025 IFA.

The audit sought input from local First Nation and Métis communities with interests on the Forest. Stakeholder and public input was sought through advertising in media outlets, social media, and notices issued using the forest management planning mailing list. A thorough review of documentation and records associated with management of the Romeo Malette Forest during the audit term was undertaken. The field audit was conducted by truck from October 7-8 as well as one day by helicopter on October 9, 2025. The audit team sampled a minimum of 10% of all activities taking place in the management unit during the audit period, including forest harvest and related operations, a range of silvicultural treatments, road building and maintenance, water crossings and forestry aggregate pits.

This report describes the audit team's findings in relation to the six regulatory requirements listed previously. A list of acronyms and more detail on audit procedures, findings and information about the audit team can be found in the following Appendices:

Appendix 1 – Audit findings and best practices

Appendix 2 – Assessment of achievement of management objectives

Appendix 3 – Compliance with contractual obligations

Appendix 4 – Information on the audit process

Appendix 5 – List of acronyms

Appendix 6 – Audit team members and their qualifications

## MANAGEMENT UNIT DESCRIPTION

The Romeo Malette Forest (RMF) encompasses an area of approximately 586,607 hectares (ha) of Crown managed land of which 92% is Crown managed forested land. The Forest is well-accessed, with major highways situated within, or near, the unit including highways 101, 144 and 576. The northern part of the unit is less accessible, with more winter roads.

The Forest is managed by GreenFirst Forest Products (QC) Inc., under Sustainable Forest Licence (SFL) #550398 awarded May 14, 2003 to RYAM Forest Management, (subsequently purchased in 2021 by GreenFirst). The majority of harvesting is conducted by the SFL holder - GreenFirst

Forest Products Inc. Major overlapping Licencee's include EACOM Timber Corporation (Interfor) and Decicon Harvesting Corp. Through a Memorandum of Agreement, the conifer sawlog volume is split between GreenFirst (45%), EACOM Timber Corporation (Interfor) (45%) and Little John Enterprises Ltd. (10%). A Minister's supply agreement directs 58,000 m<sup>3</sup> of white birch and 84,000 m<sup>3</sup> poplar annually to Georgia Pacific North Woods L.P. (Englehart). Also, Rockshield Engineered Wood Products ULC (Cochrane) has 13,400 m<sup>3</sup> veneer quality poplar committed annually to its facility. Minor, smaller licences, are issued directly by MNR for commercial fuelwood, or those utilizing residual species such as cedar. Wood supply commitments from the Forest are outlined in Table 2.

**Table 2. 2019-2029 wood supply commitments from the Romeo Malette Forest.**

<b>Wood Allocations</b>	<b>Volume (%)</b>	<b>Product</b>
GreenFirst, previously Ryam Lumber (Cochrane)	45% of SPF*	Sawlogs
EACOM Timber Corp (Timmins)	45% of SP	Sawlogs
Little John Enterprises (Timmins)	10% of SPF	Sawlogs
GP Northwoods (Englehart)	840,000 m <sup>3</sup>	Poplar Oriented Strand Board
GP Northwoods (Englehart)	580,000 m <sup>3</sup>	White Birch Oriented Strand Board
Rockshield Engineered Wood Products ULC (Cochrane)	133,800 m <sup>3</sup>	Poplar Veneer

\*SPF – Spruce-Pine-Fir

The Forest had a total harvest level of 15,078 ha over the 2019-2025 audit period, all under the clearcut silvicultural system. Approximately 599 km of road was constructed during this timeframe, with the majority (>85%) consisting of operational roads.

The Romeo Malette Forest is located in a transitional zone between the northern claybelt of Northeastern Ontario and the rolling glaciated uplands of the central transitional section of the Boreal Forest region in the south. There are 22 Species at Risk (SAR) identified in the FMP that are mainly birds, with several mammals and a few turtles, fish and one butterfly species. SAR that are listed as Endangered, Threatened or Extirpated receive habitat protection under the Endangered Species Act (ESA). Upon being listed, the MNR must develop a recovery strategy (i.e., habitat regulation) that may be implemented through the FMP with an Area of Concern prescription or Conditions on Regular Operations.

First Nations and Métis communities on or adjacent to the Forest include the following communities: Flying Post First Nation, Matachewan First Nation, Mattagami First Nation, Métis Nation of Ontario Region 3, Taykwa Tagamou First Nation, Apitipi Anicinapek, Brunswick House, Chapleau Cree First Nation, Michipicoten First Nation. Several were involved in FMP development and continue to be engaged with FMP implementation. There is an active Local Citizens' Committee (Timmins LCC) comprised of long-standing and new members. There are both road-based and fly-in tourism operations on the Forest. The Forest has been certified since

2006 under the Forest Stewardship Council (FSC®) National Forest Stewardship Standard of Canada.

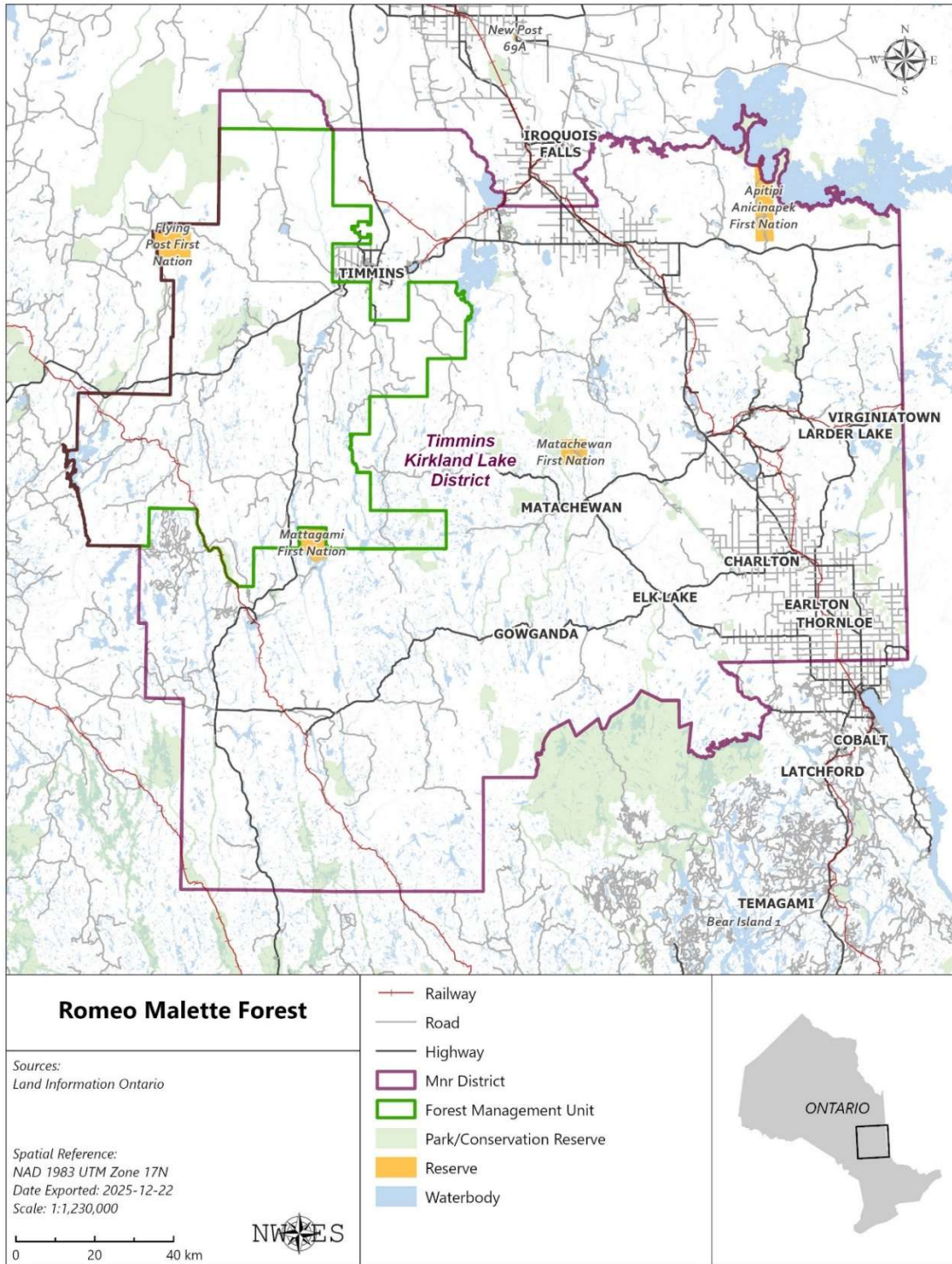


Figure 1. Map of the Romeo Malette Forest.

## AUDIT FINDINGS AND BEST PRACTICES

---

### REGULATORY REQUIREMENT A: COMPLIANCE

Regulatory requirement A includes an assessment of:

- a) *the extent to which forest management and forest management planning activities in the management unit complied with,*
  - i. *the Act and the regulations,*
  - ii. *the manuals approved under subsection 68 (10) of the Act, and*
  - iii. *any forest management plan approved under subsection 9 (1) of the Act that applied to the forest management activities during the forest audit period.*

#### **A.1 Consultation**

##### *A.1.1 First Nation and Metis communities' involvement and consultation*

Working relationships between local First Nations and Métis community representatives and forest managers – including the SFL holder and the MNR District - appear good. No substantive issues were identified through document review and interviews, with one exception related to the use of herbicides in forest renewal (addressed in more detail in Section B.5). First Nations and Métis communities were invited and several participated on the Planning Team. Two First Nations with land use interests on the Romeo Malette are also currently represented by three members on the Local Citizen's Committee (LCC).

Representation of local First Nation and Métis leadership in the implementation phases of the 2021-2031 FMP is increasing as Lands and Resources staff capacity expands. First Nation and Métis consultation on amendments is currently done based on recommendations of the MNR Resource Liaison Specialist in discussion with the MNR Management Forester, with the ultimate decision made by the MNR District Manager.

In most cases, consultation is conducted on both amendments to the FMP and revisions to the Annual Work Schedule regardless of the categorization. While there were no substantive issues identified, feedback received as part of the audit indicated that more clarity and communications on the consultation process related to plan amendments is of interest to local communities.

##### *A.1.2 Local Citizens' Committee (LCC)*

The activities of the Timmins LCC are coordinated by Timmins District MNR. The Committee has a core group of 7-12 active members who worked collaboratively during the audit term to meet the LCC mandate for implementation of the 2019-2029 FMP. GreenFirst is represented on the LCC as a member representing large industry. Company staff regularly attend LCC meetings to provide updates on operations and activities on the Forest, and planning staff make presentations on the Annual Reports and Annual Work Schedules. Timmins District MNR makes efforts to bring other natural resource topics of interest to the Committee to keep members engaged. The District Manager interacts regularly with the group (not always common), which

supports a culture that acknowledges the value of public participation in forest and natural resource management in the District.

**Best Practice 1: The District Manager’s regular engagement with the Local Citizens Committee is a best practice that acknowledges the important role of public participation in forest management on Crown Lands.**

#### *A.1.3 Public consultation*

Public consultation related to plan preparation was not in the scope of the audit. There were no plan amendments that required public consultation, with the exception of the LCC who were appropriately informed as part of regular meetings. Public notices for Annual Work Schedules, prescribed burns and aerial herbicide and insecticide projects were issued in accordance with the requirements of the FMPM. These were disseminated using a variety of outlets, including traditional and social media. For example, news articles describing the MNR Northeast Region spruce budworm spray program were published in the *Timmins Daily Press* and Kirkland Lake Northern News. Ongoing engagement efforts by both MNR and the SFL through the LCC, with stakeholders and communications with local First Nation and Métis communities to review planned operations and discuss issues of concern were evident.

#### **A.2 Issue resolution**

There were no issue resolution requests during the audit term.

#### **A.3 Plan production activities**

Plan production activities were not within the scope of the audit.

#### **A.4 Assess the proper development of the FMP**

Development of the FMP was not within the scope of the audit.

### **REGULATORY REQUIREMENT B: MEETING FMP OBJECTIVES**

Regulatory requirement B includes an assessment of “*the effectiveness of forest management activities in meeting the forest management objectives set out in the forest management plan.*”

#### **B.1 Areas of concern (AOCs)**

Area of concern prescriptions were developed during FMP production and implemented during the period of this audit. The AOCs followed those requirements found in the Stand and Site Guide as well as customized prescriptions for other identified values, such as tourism. The audit team identified and assessed AOCs during the audit via FOIP reports, harvest depletions and field samples. FOIP reports were reviewed to determine if the AOCs were applied, with no anomalies reported. The AOCs were effective in protecting the values identified. There were no forest management guide exceptions in this FMP. During the field audit, nine harvest areas were assessed on site and generally found to follow the indicated AOCs and conditions on regular operations. Field observations of the nine harvest sites determined that operations

conducted followed the conditions on regular operations and applicable AOCs and were in compliance.

## **B.2 Access**

The audit team assessed a sample of access road construction and maintenance activities including water crossing installations and forestry aggregate pits (FAPs). Seven water crossings were inspected during the field audit. Crossing installation was generally very good, and no systemic or significant issues were observed.

Management of FAPs was generally excellent. Seven FAPs were assessed, with six in conformance with requirements. One pit showed evidence of ponding, which is not consistent with the operational standards for Forestry Aggregate Pits.<sup>2</sup> Otherwise, the audit team consistently saw proper pit stabilization via sloping, establishment of setbacks and other safety considerations. Where possible, organic materials were reapplied and/or tree seedlings were planted as part of the rehabilitation efforts.

The road construction activities were completed as per the FMP requirements and were within the road corridors or operational road boundaries. An item of note is the level of road construction coupled with accumulation of logging debris resulted in the productive area lost to roads and landings to exceed the FMP target.

The original calculation used to determine the baseline level of road density for the 2019 FMP could not be replicated for the audit as the Sustainable Forest Licence holder could not find the original data used for the calculation. A new baseline road density was calculated at 0.51 km of road/km<sup>2</sup> of Crown forest area. The current road density (e.g. year six of plan implementation) was determined to be 0.67 km of road/km<sup>2</sup> of Crown forest area, which is higher than the allowed 10% variation from the FMP target. To date, GreenFirst has not completed a comprehensive review of the FMP roads layer to determine if any inoperable roads (defined as roads that are no longer driveable by a 4x4 vehicle) could be removed from the data. This exercise may bring the current road density into alignment with the target. However, at the time of the audit the variation from the target is reflected in following finding:

**Finding 1: The current level of Crown road density in km/km<sup>2</sup> exceeds the FMP target level by more than the 10% variance allowed.**

## **B.3 Harvest**

A representative sample of harvest area was assessed during the field audit from both the ground and the air. Harvest levels have been below that forecast by the FMP for the audit period due to a licensee targeting harvest on other forests other than the Romeo Malette during the first several years of the FMP. Table 3 shows the planned harvest from the FMP versus the actual harvest that occurred on the Forest during the audit term. The actual level of harvest was 30% of the planned area and the volume realized was 25% of the planned (Table

---

<sup>2</sup> The FMP states “*within the excavation area, no ponding is allowed, and offsite drainage must be designed to prevent sediment from entering any water feature.*”

3). The volume discrepancy could be a result of harvesting lower yielding stands and/or conservative yield curves used in planning.

**Table 3. FMP Planned harvest vs actual harvest in the Forest by area and volume for the period April 1, 2019 to March 31, 2024 (no data available for April 1, 2024 - March 31, 2025).**

<b>Harvest by Area and Volume</b>	<b>Romeo Malette April 1, 2019-March 31, 2025</b>
Planned Harvest Area	50,960 ha
Actual Harvest Area	15,061 ha
% of Actual to Planned Harvest Area	30%
Planned Harvest Volume (All Species)	6,587,883 m3
Actual Harvest Volume (All Species)	1,616,841 m3
% of Actual to Planned Harvest Volume	25%

Two harvesting systems are regularly used on the Forest, depending on both mill requirements and available contractor capacity. The traditional full-tree method is used, where logs are brought to roadside and processed into product as either treelength or fixed length logs. This leaves harvesting debris or slash at roadside. The use of the cut-to-length (CTL) system is increasing, and processes logs at the stump. This approach leaves debris/slash consisting of branches and other residual material on the harvest block.

Good utilization was observed for all merchantable species including black and white spruce, jack pine, balsam fir and aspen. The audit team did not observe any unutilized merchantable volumes left standing, stranded as missed bundles in cutovers or as unnecessary waste amongst roadside slash.

Harvest operations implemented were consistent with the approved FMP and associated Annual Work Schedules (AWS). During the field assessment, no issues were specifically identified or observed, and Area of Concern (AOC) boundaries were appropriately mapped and implemented. Harvest operations were effective in protecting known values on the forest. Residual forest requirements, including the retention of wildlife trees in clearcut harvest areas were met though the audit team observed areas with somewhat low levels of residuals. This area was identified in a FOIP report as having no standing wildlife trees and was part of a larger compliance issue where the area harvested was adjacent to a mining patent that was to be expanded and the request was made to the harvester to cut all the trees, without going through proper channels. There were no areas of significant rutting or other site disturbance observed during the field audit, apart from one site seen from the air. During the aerial portion of the field audit, it was observed that this harvest block had rutting in a portion of the block and was harvested during the audit term. However, it did not appear to exceed the SSG standards.

Harvesting debris (slash) on the Forest is being managed either via the harvesting system (e.g. cut-to-length (CTL) harvest where slash is left at the stump in the cutover) or by piling slash at roadside. As per the Forest Management Guide for Conserving Biodiversity at the Stand and Site Scales (Stand and Site Guide, Section 5.2.4), loss of productive land includes area lost to

slash. Section 6.1.19 of the Forest Management Plan, Supplementary Documentation entitled *RYAM Forest Management’s Strategy to Minimize the Loss of Productive Area’* refers to the Stand and Site Guide recommendation that “no more than 4% of land should be lost to roads, landings and slash piles.”

The former Slash Management Strategy was incorporated into a more comprehensive Strategy to Minimize the Loss of Productive Area for the Forest (Management Objective 15.0 in the FMP). It was observed in some areas that the cut-to-length logging method is leaving significant slash in the harvest block, potentially decreasing the productive area for regeneration in the short-term.

The area lost to roads, landings and slash during the audit period was calculated by the SFL to be 4.03%, which is above the Forest Management Plan model input of 3.12%. During discussion it was found that only those areas adjacent to intensive treatments (i.e. site prepared areas) were piled. However, this was not consistent across the sites seen, with one area adjacent to the site preparation only partially piled. The levels of debris/slash management and road densities contributed to the potential loss of productive land exceeding FMP assumptions of 3.12% of landbase are addressed in the following finding.

**Finding 2: The loss of productive forest land from roads, landings and slash exceeded the Forest Management Plan modeling assumption of 3.12%.**

#### B.4 Renewal

The Romeo Malette Forest has a renewal program that is well-planned, implemented and properly documented. The renewal activities were consistent with the locations in the approved FMP and AWS. Activities followed the Forest Operations Prescriptions (FOPs) and were consistent with the Silviculture Ground Rules (SGR) in the approved plans. Renewal treatments are keeping pace with harvest operations. On an annualized basis, the natural and planting area (3,123 ha) (Table 4) is slightly higher than the annualized actual harvest level (3,012 ha). Regeneration generally lags one to two years behind the timing of harvest, so this is not unusual. The level of successful regeneration observed during the field audit demonstrated that species selection, renewal intensity and the level of tending was well-suited for each site.

**Table 4. Annualized planned vs annualized actual regeneration Romeo Malette Forest (April 1, 2019 to March 31, 2025)**

	Natural	Natural	Planting	Planting	Seeding	Seeding
Term	Planned (ha)	Actual (ha)	Planned (ha)	Actual (ha)	Planned (ha)	Actual (ha)
April 1, 2019 – March 31, 2025	3,539	1,980	1,329	1,143	33	0

Site preparation and tending treatments are generally effective. Chemical site preparation was planned with no actual treatments taking place. GreenFirst is minimizing the use of chemicals in its renewal operations and utilizing other methods (i.e. manual tending, better site section), that has reduced the need for chemical site preparation (as seen in Table 5).

**Table 5. Annualized planned vs annualized actual site preparation on the Romeo Malette Forest (April 1, 2019 to March 31, 2025)**

	<b>Mechanical</b>	<b>Mechanical</b>	<b>Chemical</b>	<b>Chemical</b>
<b>Term</b>	<b>Planned (ha)</b>	<b>Actual (ha)</b>	<b>Planned (ha)</b>	<b>Actual (ha)</b>
April 1, 2019 – March 31, 2025	690	711	438	0

### **B.5 Tending and protection**

While herbicide remains a sanctioned forest renewal tool under Ontario policy, there is increasing public pressure to reduce or eliminate herbicide use. For example, in 2022 three First Nations filed a statement of claim in Ontario Superior Court of Justice that included concerns around the use of chemical herbicides in forestry on territories that include the Romeo Malette Forest. On the RMF, concerns around herbicides came up in planning, in the LCC minutes, and in discussion with stakeholders as part of the 2025 IFA process. Shifting to alternative treatment methods is a complex undertaking for forest managers, who are bound by the FMP to meet conifer renewal targets, even on highly competitive sites where alternative tending techniques can be less effective, challenging to implement or prohibitively expensive.

Herbicide use is addressed in FMP Management Objective 14.0: *“[The SFL] to update and implement its Regional Integrated Pest Management Strategy aimed at reducing the use of herbicides through judicious planning, application techniques and alternatives to herbicide.”*

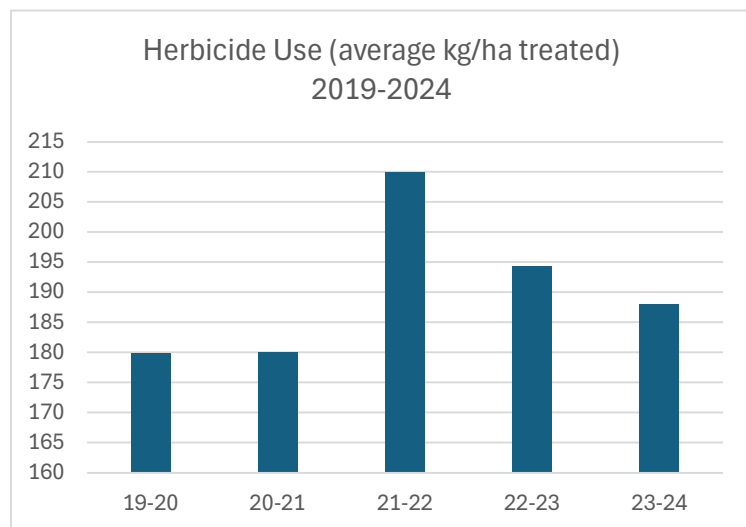
During site visits, the auditors observed successful chemical treatments applied where needed. The auditors discussed with the forest manager their attempts to reduce the level of active ingredient of herbicide in spray operations, while still meeting renewal objectives. Efforts to find alternatives as described in the FMP include experimental seedling mycorrhizal inoculation<sup>3</sup>, small areas of manual tending, and better planning/site selection. Table 6 shows the planned versus the actual area of chemical aerial tending over the audit term.

**Table 6. Annualized planned vs annualized actual tending on the Romeo Malette Forest.**

	<b>Aerial tending (chemical)</b>	<b>Aerial tending (chemical)</b>
<b>Term</b>	<b>Planned (ha)</b>	<b>Actual (ha)</b>
April 1, 2019 – March 31, 2025	1,444	1,275

<sup>3</sup> Seedling mycorrhizal inoculation is a treatment applied to the root plug of the seedlings. Mycorrhizae increase the surface area available for water and nutrient acquisition, increase water uptake and provide drought resistance. They can also increase the stress resistance of seedlings by promoting root development.

In order to assess the trend in herbicide use per unit area, the audit team used Annual Report data to determine the average application rate per ha of herbicide over the audit term. The need for herbicide can vary by e.g. ecosite type and treatment conditions. Figure 2 shows the general trend over the 5-year period. It appears there is a reduction in kg/ha used over the last three years.



**Figure 2. Average herbicide use in kg/ha from 2019-2024 (Source: Annual Reports).**

The MNR carried out a forest protection program (spruce budworm spray) over four years (2021-2024), to address an outbreak that threatened forest values in Northeastern Ontario. The implementation was effective; however, it was found that some of the areas sprayed did not meet the MNR program criteria, specifically the following criteria:

- exclude areas forecasted for harvest in the next five years as much as possible
  - some stands harvested within two years were sprayed
- include stands identified as high priority/value by forest industry
  - some stands included a high proportion of hardwood

The program would have been more effective if all stands treated met the selection criteria.

**Finding 3: The Ministry of Natural Resources' forest protection program was effective in mitigating budworm damage in target stands, however, not all stands treated met the Ministry of Natural Resource's selection criteria.**

### **B.6 Renewal support**

The seedlings planted on the Romeo Malette are the result of seed collected from the seed orchard or through bulk stand collection. During the audit period, the majority of the seed was collected from the seed orchard with a reported total of 4,587,627,520 seeds collected overall. The majority of the seed collected was white spruce. This follows the FMP direction of collecting seed from the orchard to support renewal activities. The level of regeneration is

lower than the planned FMP levels. This is in line with the lower level of harvest. The audit team reviewed areas of renewal finding that the stock produced and utilized was appropriate for the site conditions encountered.

### **B.7 Assessment of objective achievement**

The IFA looked at the first six years of the 2019-2029 FMP implementation. The FMP included 16 management objectives and 45 indicators. Of these, two (2) indicators were not assessed as they were out of the audit scope. These include: *7.3 Input related to the selection of Moose Emphasis Areas provided by local Indigenous Communities* and *7.4 Timmis Local Citizens Committee's self-evaluation of its effectiveness in plan development*.

Most of the FMP indicators are on track or largely met in year six of plan implementation, with some exceptions noted. Some of these are still achievable, while others are not likely to be achieved. Most of these are related to lower than planned harvest levels, including things like forest structure and composition, patch size and frequency, forest texture, moose browse and young forest habitat as well as social and economic objectives, due to a lack of market opportunities. The PRW (red and white pine) forest unit target is also not likely to be achieved, given difficulty of sourcing white pine seed, and challenges creating a pure PWR forest unit.

## **REGULATORY REQUIREMENT C: PLANNED VERSUS ACTUAL**

*Compare the forest management activities that were carried out with those that were planned.*

### **C.1 Annual reports**

Annual reports were completed and submitted as required. The content (tables, text, maps, digital information) are accurate, complete and in accordance with the applicable information product requirements of FMPM and FIM.

### **C.2 Enhanced annual reports**

An enhanced annual report was not available for the IFA, so the audit team relied in some cases on available data to assess whether plan objectives were met, or on track to be met by the end of the FMP term. The audit team used available ARs to evaluate the FMP objectives and determine if the activities to date would see the objectives achieved. In some cases, the objectives were partially or not achieved due to the lower level of harvested achieved compared to planned (e.g. Objective 6.4: Actual harvest level by forest unit and Objective 6.5: Actual volume by species grouping). The objective regarding young forest patch size (2.3), as another example, will not likely be achieved if the LTMD was depending on the harvest level to be that of what was planned compared to the actual area harvested to date.

### **C.3 District compliance planning and associated monitoring**

Timmins District Compliance Operations Plans (ACOP) were prepared and in place each year as required. Plans were developed using a risk-based approach and contain targets for forestry and aggregates as well as fish/wildlife and lands aspects. District compliance reporting targets

for forestry were generally met through the audit period with certain discrepancies attributable to COVID-19 restrictions that prevented MNR staff from carrying out field inspections at that time.

Only one harvest-related non-compliance out of 54 MNR inspections was noted, which represents a 98% compliance rate for the SFL’s operations over the audit term. By comparison, the last FMP had 11 reported non-compliances over a 10-year period.

#### C.4 SFL holder compliance planning and monitoring

A 10-year strategic compliance plan is in place for the 2019-2029 FMP as per the requirements of the FMPM and Forest Compliance Handbook. Annual compliance monitoring plans were also included in each approved AWS. The SFL carried out 150 inspections between 2019-2025. An annual inspection program by the SFL is conducted to ensure roads and water crossings are maintained and to identify where emergency repairs are necessary. Information is also gained from the general public who report concerns with roads and access. While compliance reporting was completed, the dates of inspection and report submission by the MNR and the SFL holder did not consistently meet the prescribed reporting timelines as laid out in the MNR Forest Compliance Handbook.

Table 7 provides examples of reports that did not meet the submission timelines. For water crossings, reports are expected within ten days of final completion of the crossing installation. In some cases, reports were submitted a few months up to two years late. For example, for FOIP inspection # 695550 (Table 7) the crossing installation date was August 19, 2019 with an inspection occurring September 29, 2019 and the report submission date of March 24, 2020. A lack of timely compliance reporting could undermine public confidence in the self-reporting and oversight systems.

**Table 7. Compliance inspection report submission dates.**

Report Type	FOIP Inspection #	Install Date	Inspection Date	Submission Date	Inspector
Access	689288	8/5/2019	10/29/2019	11/1/2019	MNR
Access	695550	8/19/2019	9/29/2019	3/24/2020	Industry
Access	693943	8/5/2020	9/29/2020	12/1/2020	Industry
Access	697822	8/3/2021	11/12/2021	11/30/2021	MNR
Access	704029	06/15/2023 - 08/30/2023	8/17/2023	6/6/2025	Industry
Access	697681	6/1/2021	9/16/2021	11/2/2021	Industry
Access	693912	7/1/2020	10/15/2020	11/27/2020	Industry
Access	691273	7/1/2019	9/15/2019	3/18/2020	Industry
Access	695608	10/1/2020	10/10/2020	5/3/2021	Industry
Access	704029	in water window	8/17/2023	1/6/2025	Industry

**Finding 4: Compliance reporting timelines in FOIP reporting were not consistently met by the MNR and the SFL holder.**

**C.5 Compliance responsibilities delivered by qualified overlapping licensees**

Interfor carries out the monitoring program on its license area and submits reports to GreenFirst for approval. GreenFirst completed inspections and reports for smaller overlapping licensees. Reports were completed and submitted as required by Interfor. There were no significant compliance issues identified over the audit period.

**C.6 Silviculture standards and assessment program**

Assessments of the SFL holder's and MNR District's management unit renewal assessment programs were undertaken. Areas to be assessed were renewed using the forest unit descriptions and SGRs contained in the 2019 FMP for the Romeo Malette Forest.

Reporting on the 'assessment of regeneration success' is performed by the SFL holder with verification through Regeneration Assessment Program (RAP) surveys completed by the MNR. The MNR annual assessment programs focus on assessing and verifying areas which have recently been declared free-to-grow (FTG) by the SFL holder. Annual targets to assess 10% of FTG areas were met. The MNR District provides the results of annual renewal monitoring programs to the SFL.

The objective *Percent of harvested forest area assessed as free-growing by forest unit* and target of >90% of the area assessed declared as free-to-grow was not achieved in all forest units. This led to **Finding #5**. As seen in

Table 8, five conifer-based forest units are under the target of 90%.

The silviculture intensity exceeded the BASC level target range of 23%-28% with 33% and the results of the EXTEN treatment were slightly lower than the treatment range of 65-80% coming in at 64%. The actual percentage successfully regenerated to the projected forest unit was not achieved with only 56% going to the projected forest unit. The closest was the PO1 forest unit with 87%, then the PJ1 forest unit with 83%.

**Table 8. Free-to -Grow percent by Free-to-Grow Forest unit.**

Free-to-Grow Forest Unit	Percent success by Free-to-Grow Forest Unit
BW1	97%
LC1	46%
MC2	100%
MH2	100%
MW1	100%
MW2	86%
OH1	100%
PJ1	100%
PJ2	100%
PO1	99%
PRW	100%
SB1	16%
SF1	86%
SP1	83%
TOTAL	87%

**Finding 5: The FMP objective target of having >90% of the area assessed declared as free-to-grow by forest unit was not met on all forest units.**

There are three different survey methods being utilized on the Romeo Malette Forest to determine free-to-grow results. The SFL holder uses the aerial ocular surveys with an option of using the Well-spaced, Free-growing (WSFG) ground survey methodology. Both are approved in the FMP. The third is the Regeneration Assessment Program (RAP) method, used by the MNR which is not referenced in the FMP. During the audit term, the SFL holder exclusively used the aerial ocular and not the WSFG method. The WSFG method is there to be used when there is difficulty determining a result aerially, generally in mixedwood stands. The aerial ocular results provide the stand composition as of the time of survey. Aerial field observations of the 2,189 ha selected as an audit sample generally supported the SFL holder’s survey results.

The MNR uses the RAP ground survey method to determine if the SFL holder’s results as submitted are representative of the site. The RAP method attempts to predict the future stand composition through application of competition rules to select specific trees to determine their ‘free-growing’ status. This is different than the aerial ocular survey that is determining species and quantities that are present at the time of survey. As a ground-based survey, the WSFG is similar to the RAP method but has different sampling designs and competition rules for determining free-growing tree status. As such, it also gives a different survey result.

Since the last audit, there have been ongoing inconsistencies between the SFL holder’s results and the MNR’s RAP survey data as a result of applying different methodologies. The SFL holder’s aerial ocular approach to free-to-grow surveys is fairly standard throughout Ontario but does not allow for direct comparison to MNR’s ground-based surveys. To date, there have

been areas of significant disagreement on the rate of renewal success. This issue is ongoing, and it was unclear to the audit team why it has not been resolved.

**Finding 6a: There continues to be a lack of alignment between the Sustainable Forest Licence holder's and Ministry of Natural Resources' free-to-grow survey results.**

**Finding 6b: There are currently no provincial policies dictating a required method or standard by which to evaluate the Sustainable Forest Licence holder's regeneration assessment results.**

#### REGULATORY REQUIREMENT D: ACTION PLAN

*Assess the effectiveness of any action plan implemented in the management unit in response to a previous forest audit report.*

##### **D.1 Action plan development**

An action plan was developed to address the 2019 audit findings. Apart from one finding, the actions were effective in resolving the issues identified. Aspects of a 2019 finding related to the implementation of the Silviculture Effectiveness Monitoring (SEM) program by Timmins District and Northeast Region MNR remain unresolved. At issue is how the validation data from the program are integrated into FMP implementation and future planning given the lack of alignment between the SFL holder's and the MNR's silviculture survey results (2025 IFA **Finding #6a**).

##### **D.2 Reporting on progress towards the completion of actions**

The Independent Forest Audit Action Plan Status Reports in the SFL Annual Reports included findings, actions and a status report on progress. Three out of four findings from the 2019 IFA were resolved, and one was carried forward in the 2025 audit findings as noted above. 2012 audit findings appeared to be integrated into the 2019 FMP, where applicable. Repeated findings on some of the same issues e.g. loss of productive land to slash, findings related to silviculture success and monitoring suggest that some of the actions integrated into the 2019 FMP were not effective or sufficiently implemented to resolve previous audit findings.

#### REGULATORY REQUIREMENT E: LICENCE

*Review and assess a licensee's compliance with the terms and conditions of a forest resource licence for the management unit by the licensee.*

##### **E.1 Sustainable Forest Licence (SFL)**

The SFL is meeting its contractual obligations. All activities are being carried out in accordance with the FMP and regulatory requirements, including monitoring and reporting. No wasteful practices were identified. Wood supply agreements are being met. All forest renewal, Forestry Futures and Crown charges have been paid. Forest Renewal Trust account minimum balances were met each year and the SFL completed FRT eligible work in accordance with planned specifications and funding eligibility requirements. The Agreed Upon Procedures audit (formerly known as the Specified Procedures audit) was completed for the 2023-2024 fiscal year and no

abnormalities were identified in the field. Provincial Roads Funding dollars are being managed appropriately and allocated amongst the licencees in a manner indicated as satisfactory by all parties.

## **E.2 Ontario Crown Timber Charges payments**

The Ontario Crown Timber Charges applicable for the Romeo Malette have been paid as required. The minimum balance for the Forest Renewal Trust (FRT) account has been maintained during the period of the audit term as of March 31 of each year. All amounts owing to the Forestry Futures Trust were paid.

## **E.3 FRT eligible silviculture work**

The SFL maintained records pertaining to the silviculture program and those items (maps and invoices) were available for the specified procedures audit. The auditors selected 10% of the areas for audit for the 2023-24 year for verification and confirmed the activities occurred in the field as documented and reported.

## **E.4 SFL or Agreement conclusion in final audit report**

The audit team concludes that management of the Romeo Malette Forest was generally in compliance with the legislation, regulations, and policies that were in effect during the term covered by the audit, and the forest was managed in compliance with the terms and conditions of the Sustainable Forest Licence held by GreenFirst Forest Products (QC) Inc., No. 550398. The forest is being managed consistently with the principles of sustainable forest management, as assessed through the Independent Forest Audit Process and Protocol.

## **REGULATORY REQUIREMENT F: SUSTAINABILITY**

Regulatory Requirement F requires an assessment of *“whether the management unit has been managed in a manner consistent with the principles of sustainability set out in subsection 2 (3) of the Act.”*

### **F.1 Determination of sustainability**

Overall, the SFL and MNR are implementing the FMP as planned and in accordance with regulations. Compliance objectives to protect other landscape values as defined through Conditions on Regular Operations and Area of Concern prescriptions have been met – the SFL has an excellent compliance record of 98% over the audit term. There is a collaborative approach between the SFL and MNR. Stakeholder engagement is ongoing and productive, and no significant conflicts were identified through the audit. Herbicide use is an ongoing issue of concern that the SFL holder is addressing collaboratively with concerned stakeholders and local Indigenous communities. Renewal treatment area is keeping pace with harvest area and the approach was generally seen to be effective.

However, market forces that are out of the licencee’s control have affected the levels of harvest on the forest. The low harvest levels (30% of planned) are affecting the achievement of some management objectives, including renewal objectives and in some cases landscape level

forest metrics as well as social and economic objectives. For example, low harvest levels are affecting the area of young forest and hence also the balance of seral stages on forest set as one of the FMP landscape metrics.

Another issue noted was that the loss of productive land to roads, landings and slash was higher than the FMP modeling assumptions (e.g. 4.02% compared to an FMP modeling assumption of 3.12%) as well as somewhat higher than the 4% benchmark set by the Stand and Site Guide. The issue of slash management is an ongoing theme in audits, not just on the Romeo Malette Forest but across the province. To date, it has not been demonstrated to be a long-term sustainability issue on the Romeo Malette. However, exceeding plan targets for loss of productive land on the Forest prior to the end of the plan term suggests that this issue may need to be examined more closely in the next planning process.

## **F.2 Monitoring indicators of forest sustainability**

Indicators of sustainability in the Romeo Malette Forest 2019-2029 FMP are in place. Each management objective includes indicators and targets that are in line with current science and legally accepted definitions of forest sustainability. These may change as new science and/or social standards evolve. There is a robust data collection system and standards for reporting.

One issue regarding the indicator for silvicultural success was noted in the 2025 IFA, as follows:

- The lack of alignment on silviculture success monitoring between the SFL and the MNR creates a lack of clarity on whether the short- and long-term renewal objectives on the Forest are being met.

## **F.3 Assessment of long-term trends**

As the FMP is only in year six of ten, it is too early to tell how six-year trends are going to affect long-term trends on the forest. For example, some landscape metrics have not been achieved due to underharvest on the forest. Because the coarse filter approach to biodiversity relies on maintaining a natural range of variation as determined through the FMP, it will take more time to determine the impact of low harvest levels on some management objectives. Certain species that rely on mature or undisturbed forest conditions may benefit (e.g. marten), and some may experience negative impacts to habitat (e.g. declining moose browse in the absence of harvest or disturbance).

It is also difficult to project the socio-economic impact the lack of harvesting will have on local communities in the longer term, as it will depend on other regional factors and developments. However, it has certainly affected communities in the short-term due to less employment and revenue from forestry activities in the region.

If loss of productive land continues at the rate it has without active intervention, it is possible that long-term the recommended levels in the Stand and Site Guide will be exceeded more significantly. This issue has been noted in two findings.

#### **F.4 Conclusions regarding sustainability of the forest**

Overall, objective achievement documented in the Forest Management Plan demonstrated that most objectives and indicators have been maintained within desired levels and that there is movement toward achievement. Assessments made by the planning team are generally consistent with assessments made by the audit team. For management objectives that are not achieving the desired levels, the appropriate rationale is documented in the FMP text. Exceptions to these conclusions have been noted as findings in the audit report.

*Concluding statement:*

The audit team concludes that management of the Romeo Malette Forest was generally in compliance with the legislation, regulations, and policies that were in effect during the term covered by the audit, and the forest was managed in compliance with the terms and conditions of the Sustainable Forest Licence held by GreenFirst Forest Products (QC) Inc., No. 550398. The forest is being managed consistently with the principles of sustainable forest management, as assessed through the Independent Forest Audit Process and Protocol.

## **APPENDIX 1. AUDIT FINDINGS AND BEST PRACTICES**

---

## Independent Forest Audit – Record of finding

### Finding #1

**Regulatory Requirement:** B Meeting Forest Management Plan objectives

**Audit Criterion:** 7 Assessment of objective achievement

**Procedure(s):** 1. List and include in the audit report, objectives and indicators from the Forest Management Plan for which the assessment of objective achievement was performed in the latest relevant annual report and the auditor’s assessment of the progress towards achieving each objective considering: Results from reviewing and assessing the annual report assessment of objective achievement including and differences and whether rationale for these differences between planned and actual results is reasonable.

**Background information and summary of evidence:**

- Road density calculations
- The current level (after 6 yrs of Forest Management Plan implementation) is 0.67 km of road/km<sup>2</sup> of Crown forest.
- This is higher than the objective (0.52 +/-10% = 0.468 to 0.572).

**Discussion:** The calculation to determine the road density was difficult to complete as the original calculation could not be replicated. A new starting level was calculated at 0.51 km of road/km<sup>2</sup> of Crown forest. The calculation at this time is 0.67 km of road/km<sup>2</sup> of Crown forest, higher than the 10% variation target. The Sustainable Forest Licence holder has not had an opportunity to review the roads to determine if any roads should be removed from the data if they are no longer roads (i.e. cannot be driven by a 4x4 vehicle).

**Conclusion(s):** The original roads data was not available for the calculation, and the current level is over the target level by 0.098 km/km<sup>2</sup>

**Finding #1: The current level of Crown road density in km/km<sup>2</sup> exceeded the target level by more than the 10% variance allowed.**

## Independent Forest Audit – Record of Finding

### Finding #2

**Regulatory Requirement:** B Meeting Forest Management Plan Objectives

**Audit Criterion:** 7 Assessment of objective achievement

**Procedure(s):** 1. List and include in the audit report, objectives and indicators from the Forest Management Plan for which the assessment of objective achievement was performed in the latest relevant annual report and the auditor’s assessment of the progress towards achieving each objective considering: Results from reviewing and assessing the annual report assessment of objective achievement including and differences and whether rationale for these differences between planned and actual results is reasonable.

**Background information and summary of evidence:**

- Loss of productive land calculation
- Field observations

**Discussion:** *Section 6.1.19* of the Forest Management Plan Supplementary Documentation entitled “*RYAM Forest Management’s Strategy to Minimize the Loss of Productive Area*” refers to the Stand and Site Guides rule of thumb to have no more than 4% of land lost to roads, landings and slash piles. “*Areas lost to roads and landings include area lost to slash*”

There are two logging methods on the Romeo Malette, full tree to roadside and cut-to-length with full tree to roadside being the predominate logging method. There was evidence of some slash piling during the field audit however, it was noted that the majority of area was not piled. During discussion it was found that only those areas adjacent to intensive treatments (i.e. site prepared areas) were piled. However, this was not consistent across the sites seen, with one area adjacent to the site preparation only partially piled. It was also stated that the SFL holder’s budget for slash piling was not sufficient to treat all of the roadside slash observed.

**Conclusion(s):** Slash piles are accumulating at roadside, contributing to the area of productive land lost to roads, landings and slash.

**Finding #2: The loss of productive forest land from roads, landings and slash exceeded the Forest Management Plan modeling assumption of 3.12%.**

## Independent Forest Audit – Record of Finding

### Finding #3

**Regulatory Requirement:** B Meeting Forest Management Plan Objectives

**Audit Criterion:** 5: Tending and Protection

**Procedure(s):** Review and assess in the field the implementation of approved tending and protection operations. Include the following: Assess whether the tending and protection treatments were consistent with the Forest Operations Prescription; the Forest Operations Prescription was consistent to the Silvicultural Ground Rule's; the Forest Operations Prescription was certified by a Registered Professional Forester, and actual operations were appropriate and effective for the actual site conditions encountered.

**Background information and summary of evidence:**

- Ministry of Natural Resources insect pest management plan
- Interviews
- Aerial field observations

The Ministry of Natural Resources implemented an Insect Pest Management Program to treat areas affected by the spruce budworm, to mitigate budworm damage to high value stands. The Romeo Malette was part of this area and over four years, between 835 ha and 15,775 ha were treated annually with two aerial applications of *Bacillus thuringiensis* var. *kurstaki* (Btk). Moderate to severely damaged areas were identified from the Forest Health surveys as priority areas for future wood supply, comprised of majority of white spruce and balsam fir. Site selection was initially done flying 10km transects with a later portion on 20km transects, to identify areas of high budworm activity. During the field portion of the audit, it was observed that areas that did not appear to meet the MNR's selection criteria as outlined in the insect pest management plan were treated.

**Discussion:** 2,778 ha of area treated were selected to review as part of the audit sample. There were treatment criteria for the program developed to protect stands with high future value. As per aerial observation, it appeared that a block of around 1,193 ha was predominantly poplar and white birch (Stop 1) with limited amounts of conifer visible. There were two other treated areas that were harvested soon after treatment or were currently being harvested. The remaining conifer wildlife trees in these areas would not be a component of the future stand (e.g. Stop 15).

**Conclusion:** The Ministry of Natural Resources initiated a pest management plan to reduce the damage to high value stands from spruce budworm. Aerial field observations showed that some of the area selected for treatment may not have met the treatment selection criteria based on the actual forest species composition observed, and that some areas were scheduled for harvest within one or two years of treatment.

**Finding #3: The Ministry of Natural Resources' forest protection program was effective in mitigating budworm damage in target stands, however, not all stands treated met the selection criteria.**

## Independent Forest Audit – Record of Finding Finding #4

**Regulatory Requirement: C4** Planned vs Actual

**Audit Criterion:** Sustainable Forest Licence/APFA holder compliance planning and monitoring  
**Procedure(s): 2.** Determine whether the compliance reports have been submitted electronically to FOIP in accordance with requirements, including timelines specified in Ministry of Natural Resources procedures and Forest Compliance Handbook.

**Background information and summary of evidence:**

- Interviews
- FOIP inspection submission
- Start-up notifications

**Discussion and Conclusion(s):**

Start-up notifications are received by Timmins District MNR consistently and accurately. These notifications have been useful in avoiding issues as they arise. Compliance reports are submitted to FOIP and reflect field observation appropriately. However, the timelines for report submission (generally 10-20 days following completion of operations/crossing installations as per the MNR Forest Compliance Handbook) are not consistently being met by either MNR and the SFL holder. A review of the database confirms that this is the case with examples provided in *Table 7. Compliance inspection report submission dates.*

**Finding #4: Compliance reporting timelines in FOIP reporting are not consistently being met by the MNR and the SFL holder.**

## Independent Forest Audit – Record of Finding

### Finding #5

**Regulatory Requirement: B Meeting Forest Management Plan Objectives**

**Audit Criterion: 7** Assessment of objective achievement

**Procedure(s):** 1. List and include in the audit report, objectives and indicators from the Forest Management Plan for which the assessment of objective achievement was performed in the latest relevant annual report and the auditor’s assessment of the progress towards achieving each objective considering: Results from reviewing and assessing the annual report assessment of objective achievement including and differences and whether rationale for these differences between planned and actual results is reasonable.

**Background information and summary of evidence:**

- Free-to-Grow survey results
- Tableau
- AR submitted results

The level of renewal is keeping up with the level of harvest. The free-to-grow survey results indicate that 83% of the area surveyed between 2019 and 2023 were free-to-grow. The remaining 17% were Not Sufficiently Regenerated. The target of 65-80% EXTEN treatment was not met, however it is close at 64%. The BASC intensity exceeded the upper target of 28% with 32%. Only 56% of the area is successfully regenerating to the target forest unit in the originally assigned SGR.

**Discussion:** The free-to-grow areas surveyed are not, for the most part, achieving the targeted forest unit. They are able to be declared free-to-grow, but to a different forest unit than planned. There are differences between the targeted forest unit and the realized forest unit in most of the forest units. The desired Plan level was to achieve >90% of the area assessed declared free-to-grow by forest unit. This was not achieved, with 5 forest units below the 90% target. Areas assessed for free-to-grow are not meeting the target forest unit laid out in the originally assigned SGR. The SGRs are being updated to reflect field observations. The FMP utilizes the originally assigned SGR for strategic planning. The percentage of area treated by planned silviculture intensity exceeded the BASC level target range of 23%-28% with 32% and the results of the EXTEN treatment were slightly lower than the treatment range of 65-80% coming in at 64%. The actual percentage successfully regenerated to the projected forest unit was not achieved with only 56% going to the projected forest unit. There were two forest units that returned to the targeted forest unit with the most success. These were the PO1(87%) and PJ1 (83%) forest units.

**Conclusion:** Areas assessed for free-to-grow status are not meeting the target forest unit laid out in the originally assigned SGR and are not meeting the rates of success targeted in the Forest Management Plan. The results should be incorporated into the next Forest Management Plan as part of the *Analysis of Past Silvicultural Outcomes*.

**Finding #5: The FMP objective target of having >90% of the area assessed declared as free-to-grow by forest unit was not met.**

## Independent Forest Audit – Record of Finding Finding #6a and b (carried forward from 2019 IFA)

**Regulatory Requirement: C** Planned vs Actual

**Audit Criterion:** 6: Silviculture Standards and Assessment Program

**Procedure(s):** 2. Assess whether the management unit assessment program is sufficient and is being used to provide the required silviculture effectiveness monitoring information including whether it:

- Assesses overall effectiveness of treatments, including those that are exceptions to the silvicultural guides, i.e. documented program, survey methodology such as survival stocking, establishment (previously free-to-grow) surveys, records....
- Compare Ministry of Natural Resources District silviculture monitoring results (where they may exist) with those of the Sustainable Forest Licence. Evaluate and explain any differences in results.

**Background information and summary of evidence:**

- 2019 Silviculture Effectiveness Monitoring - Romeo Malette Forest Summary Table (ocular aerial vs Modified\_SO-iSTRS)
- 2022 Timmins District Regeneration Assessment Program Report (ocular aerial vs MNR's Regeneration Assessment Program)
- 2023 Romeo Malette Forest Regeneration Assessment Program Report (ocular aerial vs MNR's Regeneration Assessment Program)
- 2024 Romeo Malette Forest Regeneration Assessment Program Report (ocular aerial vs MNR's Regeneration Assessment Program)
- Regeneration Assessment Program methodology
- Forest Management Plan Supp Doc 6.1.18
- Interviews

The FMP documents two accepted survey methods for free-to-grow surveys to be used by the SFL holder (ocular aerial or ground-based, well-spaced, free-growing method). The FMP does not include the method that the MNRs uses to corroborate the results.

The Timmins District MNR is currently following the MNR Northeast Region Regeneration Assessment Program methodology, a change from the Well-spaced, Free-growing (WSFG) method. This approach entails collecting the field data, then providing the data to the Region for analysis and results. The Region then compares the SFL holder's free-to-grow results (primarily done via the ocular aerial method) and agrees or disagrees with the SFL holder's results. The 2023 AR data for free-to-grow was submitted in November 2024 and subsequently rejected by the MNR Northeast Region due to their results differing from the SFL holder. Since then, no discussions have taken place between Timmins District MNR and the SFL holder to discuss these results, although the SFL holder had requested a meeting and requested to join them for their MNR RAP training. This was previously observed as a long-standing issue in the 2019 IFA report as follows:

*“There are significant variances between Sustainable Forest Licence holder free-to-grow survey results and Ministry of Natural Resources Core Task 1 results in the 2016 report. All Ministry of Natural Resources free-to-grow surveys resulted in Not Sufficiently Regenerated (NSR) classification due to low stocking levels on harvest blocks with PO1, MW1, SB1, and SP1 Forest Units. In contrast, the Sustainable Forest Licence holder identified the blocks as either a Regeneration or Silviculture Success (indicating that minimum stocking standards were achieved). The Northeast Region Strategy document identifies “opportunities for an annual Silviculture Effectiveness Monitoring information exchange meeting for both Ministry of Natural Resources and Sustainable Forest Licence staff to review results and lessons learned” as a Best Management Practice. Despite the significant variation in findings our interviews with the Sustainable Forest Licence holder and Ministry of Natural Resources staff indicated that no discussions or efforts to reconcile data discrepancies have taken place since 2014/2015 (Finding #2).”*

**2019 IFA Finding #2: The Northeast Regional Office and the Timmins District Office did not fully meet Silviculture Effectiveness Monitoring program direction on the Romeo Malette Forest.**

The MNR does not have an approved provincial policy regarding Silviculture Effectiveness Monitoring, nor a singular accepted provincial survey methodology in use to validate SFL holder’s regeneration survey results reported in the ARs. There is no current provincial Silviculture Effectiveness Monitoring policy that provides a clear process that defines the survey methods to be used to evaluate the establishment results reported by the SFL holder, how any differences are determined, or any official mechanism to address any differences with the District Manager or Regional Director.

**Discussion:** There are three different survey methods utilized on the Romeo Malette Forest to determine free-to-grow results. The SFL holder uses the aerial ocular surveys exclusively, providing the stand composition at time of survey. There is the option of using the WSFG ground survey methodology when there is difficulty determining a result aerially. Both are approved in the FMP. The third is the RAP method, used by the MNR which is not listed in the FMP Plan. Aerial field observations of the 2,189 ha selected as an audit sample generally supported the SFL holder’s survey results.

Of the 2,189 ha reviewed, a small number of small changes in four stands were observed (total of 68.8 ha). These were changes in the percentage of a leading species (i.e. Pj70 change to PJ90; Po60 to Po70; and Sx 80 to Sx100). There were 2 blocks where there was a complete change of leading species whereby the forest unit would change (22.7 ha total). These were in two locations. Block #228-one stand- changing from PO 70 to Sb40 and in Block #268-one stand- changed from Sb70 to La70. These areas comprise 4.2% of the area audited.

The MNR uses the RAP ground survey method to determine if the SFL holder’s results submitted are representative of the site. These results are from aerial ocular and not WSFG method. The RAP method attempts to predict the future stand composition through application of competition rules to select specific trees to determine their ‘free-growing’ status. This is different than the aerial ocular survey that is determining species and

quantities that are present at the time of survey. The SFG is similar to the RAP method, being ground-based, but it has different sampling designs and different competition rules for determining free-growing tree status, giving another result.

The RAP methodology was developed in and used by Northeast Region and has undergone several revisions after implementation. This is not yet a standard methodology for the province nor endorsed as part of current provincial silviculture policy. Forest Management Planning Manuals used to prepare current FMPs do not require Licence holders to implement a specific regeneration assessment method but do require them to describe the chosen silvicultural assessment and monitoring program in the FMP text. Ground-based survey methods like RAP are likely to give more statistically reliable results of renewal at the time of survey than aerial ocular surveys, but the two methods count trees differently. As such, discrepancies between results should not result in rejection of the SFL holder's survey results unless more evidence of a systemic problem is identified. It was unclear to the audit team why this long-standing issue has not been resolved.

**Conclusion:** Since the last audit, there has been continuing inconsistency between the SFL holder's results and the MNR Regeneration Assessment Program results through use of different methodologies. The current MNR and SFL holder methodologies do not allow for direct comparison of results to make a determination of successful renewal. The following findings represent continuing issues identified in the 2019 IFA and carried forward in 2025.

**Finding 6a: There continues to be a lack of alignment between the Sustainable Forest Licence holder's and Ministry of Natural Resources' free-to-grow survey results.**

**Finding 6b: There are currently no provincial policies dictating a required method or standard by which to evaluate the Sustainable Forest Licence holder's regeneration assessment results.**



## Independent Forest Audit – Record of finding Best Practice #1

### **Regulatory Requirement: A: Compliance**

#### **Audit Criterion: A.1.2 Local Citizen’s Committee**

#### ***Procedure(s):***

1. Assess establishment and function of the Local Citizen’s Committee during the term of the audit. This shall involve a review of the Local Citizen’s Committee membership, the Local Citizen’s Committee terms of reference, the Local Citizen's Committee minutes, and other Local Citizen's Committee requirements as per the applicable FMPM.
2. Review and assess whether the Local Citizen's Committee met the purposes and conducted its activities in accordance with the applicable FMPM.
3. Review and assess whether the Local Citizen's Committee effectively communicated local interests in forest management planning to the MNR and FM.

#### **Background information and summary of evidence:**

- Interviews with members of Local Citizen’s Committee
- Interview with District Manager and District staff
- Review of Local Citizen Committee minutes for 2019-2025

#### **Discussion:**

Timmins District MNR is doing an excellent job of supporting and engaging the core group of Local Citizen's Committee members. A range of topics is included at the request or interest of Committee members, including field trips. The Committee meets monthly with exception of July, August and December and remained active during the pandemic, a testament to the commitment of the group. The District Manager had regular engagement with the LCC at meetings, which is not always common. Activities of the Committee are documented online and updated through a blog maintained by the Committee members.

#### **Conclusion:**

A District culture of engagement with the LCC, including the participation of the District Manager, helps optimize the Local Citizen’s Committee contributions to forest management.

**Best Practice #1: The District Manager’s engagement with the Local Citizens Committee is a best practice that acknowledges the important role of public participation in forest management on Crown Lands.**

## Independent Forest Audit – Record of finding Best Practice #2

### Regulatory Requirement: A: Compliance

#### A.1 Consultation

The process of forest management planning, implementation and monitoring must be conducted in an open consultative fashion, with the involvement of the First Nations and Métis communities, Local Citizen’s Committee, and other parties with an interest in the operations of the management unit.

#### A.1.3 Public consultation

*Procedure 1.* Review and assess whether the public consultation process for the plan, any amendments, and extensions met the public consultation requirements of the applicable FMPM and whether the process was effective.

#### Background information and summary of evidence:

- Interviews with participating First Nation Lands and Resources staff
- Interviews with Local Citizen’s Committee
- Review of Annual Work Schedule and Annual Report
- Interviews with GreenFirst staff
- Interviews with Ministry of Natural Resource staff
- Review of Local Citizen Committee and Planning Team minutes
- Review of Issue Resolution (none during audit term)
- Review of public consultation

#### Discussion:

GreenFirst staff maintain direct and regular communication with stakeholders, with attempts in good faith to address concerns as they are raised. Examples include:

- Protection of a viewscape along a cottage road
- Prompt withdrawal of areas that were identified as a concern for spray operations from the AWS
- No issues resolution requests were made during the last Forest Management Planning process

#### Conclusion:

A pro-active approach benefits all parties and can help prevent conflict.

**Best Practice #2: The SFL holder’s pro-active approach to stakeholder and Indigenous engagement is a best practice.**

## APPENDIX 2: ASSESSMENT OF ACHIEVEMENT OF MANAGEMENT OBJECTIVES

---

*Note: There was no Year 7 Enhanced Annual Report available for the 2025 audit. The trends identified here are based on an assessment of progress using available data up to year 6 implementation of the 2019-2029 FMP.*

	<b>Management objectives and indicators</b>	<b>Target level</b>	<b>Auditor assessment</b>
<b>1</b>	<b>To develop, over time, a forest with an age class structure, composition and abundance that resembles that of a fire-driven boreal forest ecosystem that can support a broad range of wildlife species.</b>		
1.1	<i>Area of immature and older pine</i>	Increase and maintain within the IQR (33,090 to 51,470 ha)	Achieved  Planned harvest levels in first 5 years of FMP achieved.
1.2	<i>Area of mature and older upland conifer</i>	Maintain within the IQR (35,961 to 52,330 ha).	Achieved  Target area was achieved in the short and medium-term
1.3	<i>Area of immature and older hardwood and immature mixedwood</i>	Maintain within the IQR (103,881 to 134,722 ha)	Achieved
1.4	<i>Area of mature and older mixedwood</i>	Maintain within the IQR (55,001 to 79,298)	Achieved
1.5	<i>Area of mature and older lowland conifer</i>	Maintain within the IQR (59,157 to 124,998)	On track  If harvest continues at the same level as the first five years the target will likely be achieved.
1.6	<i>Total old growth area</i>	Increase and maintain within the IQR (113,944 to 160,929 ha)	On track  With low level of actual harvest at 30%, of planned, the level of old growth may be achieved.

1.7	<i>Area of the PRW forest unit (all ages) for the Crown Productive Forest</i>	Maintain or increase the current area (730 ha) of the PRW forest unit group by conducting 100 hectares/period of red and white pine restoration over the long-term.	Partially Achieved  With the difficulty of sourcing Pw seed, and lack of pure plantations to create the PWR forest unit, the likelihood of this indicator being achieved via artificial means is not likely. White pine weevil also poses challenges to successful Pw stands.
1.8	<i>Area of conifer forest units (all ages) - Area of 1 PJ1, PJ2, SP1, SF1, SB1 and LC1.</i>	Maintain within the IQR (251,420 to 316,384 ha)	Achieved at LTMD  LTMD evaluation indicated that the target area was achieved in the short, medium and long-term.
1.9	<i>Area of young forest (&lt;36 years)</i>	Move towards and/or maintain within the IQR (55,997 to 105,383 ha)	Not on Track  To date actual level of harvest has not met the planned level therefore young forest less than LTMD projections.
2	<b><i>To develop, over time, a forest with a landscape pattern resembling a fire-driven boreal forest ecosystem that can support a broad range of wildlife species.</i></b>		
2.1	<i>Texture of mature and old forest – 5,000 hectare frequency distribution (proportion of hexagons)</i>	The 5,000 hectare frequency proportion should move toward the SRNV mean.	Partially achieved  There was movement towards the mean in three of the five age classes (01-20, 41-60 and >80). There was movement away from the mean for the 21-40 and 61-80 classes.

2.2	<i>Texture of mature and old forest – 500 hectare frequency distribution (proportion of hexagons)</i>	The 500 hectare frequency proportion should move toward the SRNV mean.	Partially achieved  There was movement towards the mean in three of the five age classes (01-20, 41-60 and >80). For the 01-20 class after the first period there was movement away from the mean.
2.3	<i>Young forest patch size – patch size frequency</i>	Target Levels: the young forest patch size frequency proportion should move toward the SRNV mean.	Not on track  At this time, it is not expected that this indicator can be achieved by the end of the 2019 FMP with the current harvest levels.
3	<b><i>To create a forest landscape condition which provides an adequate amount and distribution of caribou habitat within the area of the Kesagami Range which overlaps the Romeo Malette Forest.</i></b>		
3.1	<i>The planned harvest area within the Kesagami Range</i>	Schedule the remaining eligible and operable harvest area within the Kesagami Range within the first ten years of the FMP.	On track  This indicator could be achieved if harvest is still allocated in this area for the next 5 years.
3.2	<i>The area of winter suitable habitat within the Kesagami Range</i>	To increase and maintain within the interquartile range of 23,904 to 25,430 ha.	On track  If the harvest area is achieved, the area will be on target as per LTMD projections
3.3	<i>The area of mature conifer habitat within the Kesagami Range</i>	To increase and maintain within the interquartile range of 8,472 to 11,795 ha.	On track  Target could be achieved over full plan term.

<b>4</b>	<b>To consider the provision of Moose Emphasis Areas (MEAs) on the Romeo Malette Forest.</b>		
4.1	<i>Area of Romeo Malette Forest managed as Moose Emphasis Areas</i>	Up to 10% of the RMF managed as MEAs > 2,000 hectares with a preference for areas greater than 10,000 hectares.	Achieved  At LTMD the nine selected MEAs represent 8.8 percent of the landbase, or 53,526 ha. This is within the desired short-term level.
4.2	<i>Structure and composition of individual Moose Emphasis Areas: Browse-producing habitat</i>	5-30% of each selected MEA is browse-producing habitat.	Partially achieved  Two MEAs will age out of browse conditions during the plan period.
4.3	<i>Structure and composition of each Moose Emphasis Area: mature conifer dominated habitat</i>	15-35% of each selected MEA is mature conifer-dominated forest.	Achieved  Based on the Planned Operations all cores are within the target level for mature conifer-dominated habitat.
4.4	<i>Structure and composition of each Moose 1 Emphasis Area: hardwood/mixedwood dominated habitat</i>	Target Levels: 20-55% of each selected MEA is hardwood-dominated or mixedwood.	Partially achieved  All but two MEAs were maintained within the range.

5	<p><b>Rayonier Advanced Materials will maintain a current list of Species at Risk (SARs) known to exist on the Romeo Malette Forest and ensure suitable prescriptions are developed in the FMP for species affected by forest management to protect and maintain their critical habitat as per the requirements of the Endangered Species Act (2007).</b></p>		
5.1	<p><i>List of known and affected Species at Risk on the Romeo Malette Forest</i></p>	<p>Review the SARO list annually and develop new AOCs as required.</p>	<p>Achieved</p> <p>Annual updates to SARO list and changes are made to the list of known and affected species at risk on the Romeo Malette Forest</p>
6	<p><b>Supply industrial and consumer wood needs while maintaining forest sustainability, and to realize a predictable, continuous, and consistent flow of roundwood from the Romeo Malette Forest.</b></p>		
6.1	<p><i>Long-term projected available harvest volume by species group</i></p>	<p>The current industrial demand, or the committed levels (if higher than CID)</p>	<p>Achieved</p> <p>Slight decrease in birch volume achievement in the long term (90% of target) but still significantly above the current demand.</p>

6.2	<i>Planned harvest area by forest unit as per the LTMD</i>	Allocate for harvest 100% of the forecast harvest area by forest unit (10 years)	Achieved  10-year planned harvest layer was either equal to or slightly less than the LTMD available harvest area for all forest units, with 99.9 percent of the AHA allocated.
6.3	<i>Planned harvest volume by species group</i>	Allocate for harvest 95% of the Available Harvest Volume area by species group (m3/year)	Partially achieved  SPF is slightly below the target by 10,529 m3/yr
6.4	<i>Actual harvest area by forest unit as a % of the planned harvest area</i>	Target: To utilize 100% of the planned harvest area (ha)	Partially achieved  To date (2023) 30% of the planned area was harvested. Four forest units met or exceeded target levels.
6.5	<i>Actual harvest volume by species group as a % of the planned harvest volume</i>	Target: To utilize 100% of the planned harvest volume (m3/year)	Not achieved  To date, actual harvest volume is 25% of the planned volume. All species groups were below expected planned volume of 50%.
<b>7</b>	<b><i>To provide opportunities to local Indigenous communities and the public for input, consultation, participation and education during the development and implementation of the forest management plan.</i></b>		
7.1	<i>Consultation Plans developed for all interested Indigenous communities on the RMF</i>	Consultation plans developed for all (100%) Indigenous communities on the Romeo Malette Forest.	Achieved

7.2	<i>Protection planned for all known Indigenous values identified during the forest management planning process</i>	AOCs and or/ or CROs developed for all known Indigenous values.	Achieved  The FMP includes AOC prescriptions for archaeological potential areas, confidential values and cultural heritage landscapes.
7.3	<i>Input related to the selection of Moose Emphasis Areas provided by local Indigenous Communities</i>	Indigenous Task Team involved in the selection of candidate MEAs.	Out of audit scope
7.4	<i>Timmins Local Citizens Committee's self-evaluation of its effectiveness in plan development</i>	Results of the Timmins LCC's self-evaluation survey	Out of audit scope
<b>8</b>	<b>Conduct forestry practices in a manner such that all resource users may gain benefits from forest access roads, while recognizing that compromises need to be made to ensure the viability of resource-based activities.</b>		
8.1	Kilometers of road per square kilometre of Crown forest	Target: To maintain a road density of 0.52 km of road/km <sup>2</sup> , ±10%	Not achieved  The current level (after 6 yrs of FMP implementation) is 0.67 km/km <sup>2</sup> of road. This is higher than the objective (0.52 +/-10% = 0.468 to 0.572).  <b>Finding #1:</b> The current level of Crown road density in km/km <sup>2</sup> exceeded the FMP target level by more than the 10% variance allowed.

8.2	Density of all roads within harvest blocks (excludes trails and roads leading to or between blocks)	Maintain the operational road density below 0.0395 km/ha	Achieved  There were 0.0296 km/ha of all roads within blocks.
8.3	<i>Review of proposed access restrictions and/or decommissioning plans (i.e., transfer of SFL roads to the MNRF) with the Timmins LCC and local Indigenous communities</i>	Access restrictions and/or transfer proposals will be reviewed with the Timmins LCC and local Indigenous communities.	Achieved  Access plans and decisions were reviewed with the LCC and local Indigenous communities as part of the LCC activities, FMP amendments and ongoing engagement at the AWS stage.
<b>9</b>	<b>To ensure that the available forest is protected from sustained deforestation or conversion to other uses.</b>		
9.1	<i>Managed Crown forest available for timber production by Forest Unit</i>	The conversion of area lost to roads and landings shall not exceed the levels modeled by forest unit (average 3.12%)	Not achieved  The area lost to roads and landings is 4.03%, higher than the level modeled.  <b>Finding #2:</b> The loss of productive forest land from roads, landings and slash exceeded the Forest Management Plan modeling assumption of 3.12%.
<b>10</b>	<b>Keep forest ecosystems productive and healthy.</b>		

10.1	<i>Percent of harvested forest area assessed as free-growing by forest unit</i>	>90% of the area assessed and declared as free-to-grow.	Not achieved  There were 5 forest units that were below the 90% target.  <b>Finding #5:</b> The FMP objective target of having >90% of the area assessed declared as free-to-grow by forest unit was not met.
10.2	<i>Planned and actual percent of harvest area treated by silvicultural intensity</i>	100%, ±10%, of actual harvest area treated by planned silviculture intensity. • EXTEN – 65 to 80% • BASC – 23 to 28% • INTN – 1.8 to 2.2%	Not achieved  The target of 65-80% EXTEN treatment was not met, however, it is close at 64%. The BASC intensity exceeded the upper target of 28% with 32%.
10.3	<i>Planned and actual percent of the area successfully regenerated to the projected forest unit by forest unit</i>	80% of the area successfully regenerated to the projected forest unit.	Not achieved  This objective was not achieved, with 56% of the area successfully regenerating to the projected forest unit.
11	<b>To encourage and ensure compliance with legislative and regulatory requirements, which contribute to the sustainable management of Ontario's forests.</b>		
11.1	<i>Non-compliance in forest operations inspections (% of inspections in non-compliance, by activity and remedy type)</i>	A maximum of 5% of inspections having a non-compliance; zero inspections resulting in administrative fines.	Achieved  The SFL achieved a 98% compliance rate during the audit term.

12	<p><b>Provision of forest cover for those values that are dependent on the Crown forest: To provide for a range of quality resource-based tourism and recreation opportunities in response to demand, while maintaining forest sustainability and ensure the protection of other values on the land base.</b></p>		
12.1	<p><i>Compliance with prescriptions for the protection of natural resource features, land uses or values dependent forest cover (% of inspections in compliance)</i></p>	<p>A maximum of 5% of inspections having a non-compliance; zero inspections resulting in administrative fines.</p>	<p>Achieved</p> <p>There were no AOC or values-related non-compliances.</p>
12.2	<p><i>Compliance with prescriptions for the protection of resource-based tourism values (% of inspections in compliance)</i></p>	<p>A maximum of 5% of inspections having a non-compliance; zero inspections resulting in administrative fines.</p>	<p>Achieved</p> <p>There were no tourism-related non-compliances.</p>
12.3	<p><i>Compliance with utilization standards (% of inspections in compliance)</i></p>	<p>A maximum of 5% of inspections having a non-compliance; zero inspections resulting in administrative fines.</p>	<p>Achieved</p> <p>There were no utilization non-compliances.</p>
12.4	<p><i>Compliance with prescriptions for cultural heritage features and Indigenous values (% of inspections in compliance)</i></p>	<p>A maximum of 5% of inspections having a non-compliance; zero inspections resulting in administrative fines.</p>	<p>Achieved</p> <p>There were no cultural heritage non-compliances.</p>

13	<b>Conduct forestry practices in a manner which minimizes and mitigates the impacts on the environment, water quality and aquatic habitat within areas of harvest, renewal, tending and access operations.</b>		
13.1	<i>Compliance with management practices that prevent, minimize or mitigate site damage (% of inspections in compliance)</i>	A maximum of 5% of inspections having a minor non-compliance; zero inspections having moderate or major non-compliance	Achieved  There were no site damage non-compliances.
13.2	<i>Compliance with prescriptions developed for the protection of water quality and fish habitat (% of inspections in compliance)</i>	A maximum of 5% of inspections having a minor non-compliance; zero inspections having moderate or major non-compliance.	Achieved  There were no water quality or fish habitat non-compliances.
14	<b>Rayonier Advanced Materials to update and implement its Regional Integrated Pest Management Strategy aimed at reducing the use of herbicides through judicious planning, application techniques and alternatives to herbicide.</b>	Reduce herbicide use on the Forest – measured in Kg of Active Ingredient per year	Achieved for most of audit term.  The was a reduction in kg/ha of herbicide used in the last three years. Data for 2024-2025 was not available.

15	Rayonier Advanced Materials to update and implement it Slash Management Strategy for the Romeo Malette Forest to minimize loss of productive area, consistent with the direction provided in the Stand and Site Guide (<4% of areas lost to roads, landings and slash, combined).	This document has been updated and renamed to reflect its intent; RYAM Forest Management's Strategy to Minimize the Loss of Productive Area.	<p>Not achieved</p> <p>The loss of productive land exceeded the direction in the Stand and Site Guide (actual 4.03% vs 4% in SSG).</p> <p><b>Finding #2:</b> The loss of productive forest land from roads, landings and slash exceeded the Forest Management Plan modeling assumption of 3.12%.</p>
16	<b>During the implementation of the FMP, RYAM will support emerging climate change science and policy initiatives that promote the development of new mitigation (i.e., reduce activities that emit carbon and increase activities that store carbon) and adaptation (i.e., assisted migration of tree seed) strategies applicable to forest management on the Romeo Malette Forest.</b>	This document has been updated and is included in Section 6.1.20 of the Supplementary Documentation.	<p>Achieved</p> <p>New ecodistricts and seed policy – does move seed around from further south – refer to Guide 6.1.20 Supplementary Documentation.</p>

### APPENDIX 3. COMPLIANCE WITH CONTRACTUAL OBLIGATIONS

<b>Licence condition</b>	<b>Licence holder performance</b>
Payment of Forestry Futures and Ontario Crown Charges	All charges were paid
Wood supply commitments, sharing arrangements, special conditions	Wood supply commitments were upheld, and arrangements were made between companies
Preparation of FMP, AWS and reports; abiding by the FMP and all other requirements of the FMPM and CFSA	The FMP, AWS and reports were submitted according to the FMPM and the CFSA
Conduct inventories, surveys, tests and studies; provision and collection of information in accordance with the FIM	Data was collected and submitted in accordance with the FIM
Wasteful practices not to be committed	No wasteful practices were observed
Natural disturbance and salvage SFL conditions must be followed	Conditions were followed
Protection of the licence area from pest damage, participation in pest control programs	The Romeo Malette Forest was part of the pest control program for spruce budworm
Withdrawals from licence area	No major withdrawals were observed
Action plan and progress towards the completion of actions as reported in annual reports or status reports prepared under previous versions of the IFAPP	The Action plan and progress towards the completion of actions were reported in the annual reports
Payment of forest renewal charges to the FRT eligible silviculture work	Payments were made for eligible silviculture work
FRT forest renewal charge analysis	FRT renewal charge analysis was completed each year to set the FRT rate
FRT account minimum balance	The minimum balance of the FRT account was maintained
Silviculture standards and assessment program	The silviculture standard and assessment program was followed as per the FMP
First Nation and Métis opportunities	The SFL holder is working pro-actively with interested First Nation and Métis communities.

Preparation of compliance plan	The compliance plan was developed and implemented as per the FMP and the AWS
Internal compliance prevention/education program	Staff are appropriately qualified and contractors receive regular compliance training.
Compliance inspections and reporting; compliance with compliance plan	The SFL had a compliance rate of 98% over the audit term. Reporting is being completed.
SFL forestry operations on mining claims	Forestry activities were implemented consistent with the requirements for operating on mining claims

## APPENDIX 4. AUDIT PROCESS

---

### REQUIREMENT FOR INDEPENDENT FOREST AUDITS

IFAs are legally required under Ontario Regulation 319/20, made under the Crown Forest Sustainability Act (C.F.S.A.). The key source of direction for the IFA comes from the Independent Forest Audit Process and Protocol (IFAPP). IFAs evaluate forest management against six categories of regulatory requirements, as described in the 2025 IFAPP:

- A. Compliance
- B. Meeting FMP objectives
- C. Planned versus actual
- D. Action plan
- E. Licence
- F. Sustainability

Findings arise from audit team observations of material non-conformances and the identification of situations in which there is a significant lack of effectiveness in forest management activities. Similarly, the audit team may highlight best practices for the cases where auditees' actions go above and beyond legal requirements and result in positive outcomes for forest and communities. The IFA findings are addressed by the auditees (SFL holder, District, Region and Corporate MNR) in the IFA action plans and progress toward addressing findings will be documented in Annual Reports for the management unit.

### AUDIT PLAN AND SITE SELECTION

The audit plan outlined the protocols selected with the rationale, key contacts, and audit schedule. A pre-audit meeting was held with discussion regarding site selection following. Field site samples were selected by the audit team with logistical information provided by the Auditees. The initial site selection was a 20% sample of the harvest and silviculture operations. This was netted down after consulting with the SFL holder regarding method of access (truck or helicopter) to a minimum 10% sample. There were no sites brought forward by stakeholders, First Nation or Métis communities or the general public.

The sites were selected according to the IFAPP using shapefiles provided by the SFL holder. The areas were selected randomly by operating year, forest management activity, species renewed and access. Water crossings, forestry aggregate pits and wood storage yards were also selected.

A 10% sample of the area within the FRT specified procedures audit was also selected by the audit team for the 2023-204 year. This level of sample was achieved.

The field audit consisted of 2 field days by road (October 7-8) and 1 day by helicopter (October 9). The closing meeting was held on October 24, 2025, where draft findings were presented to the auditees. The LCC received a presentation of draft audit findings on October 29. Comments received from the SFL **holder**, the MNR, **LCC and participating First Nations** on the audit findings were taken into consideration during the development of the audit report.

**Table 9. Field audit site selection representing a minimum of 10% of all activities.**

Activity	Total area/number within the audit period	Selected	Audit sample (%)
Harvest	15,078	2,169	14.4
Regen – Plant, Seed, Natural, Claag	19,358	2,578	13.5
Site Preparation – Mechanical and Chemical	3,382	473	14.0
Tending	10,734	1,430	13.3
Free to Grow	16,159	2,189	13.5
PRT	21,398	2,915	13.3
Water Crossings	51	7	13.7
Aggregate Pits	60	9	15.0
Roads (constructed and decommissioned)	599	81	13.5
Slash and Chip treatment	120 km	17 km	14.1

**Table 10. Audit sample of FRT-funded activities from 2023-2024 Specified Procedures Report.**

Activity	2023-2024 total activity (ha)	Sample area (ha)	Audit sample (%)
Regen – Plan, Seed, Claag	3,374	542	16.1
Site Preparation – Mechanical and Chemical	170	38	22.4
Tending	2,275	320	14.1
Free to Grow	1,646	218	13.2

### Public Consultation

It is always a challenge to generate public interest in audit activities. The NorthWinds audit teams often rely in large part on making direct contact with known stakeholders to gather input but also continue to experiment with other methods. NWES used print and online media outlets (Timmins Daily Press), social media and email including links to an online survey to advise the public that an Independent Forest Audit would be conducted on the Romeo Malette Forest and inviting comments. An audit poster for public distribution was provided to the LCC, as well as local Indigenous communities for posting and included a QR code that linked to the online survey. A notice of the audit was sent to the FMP mailing list that was provided by the MNR.

# ROMEO MALETTE FOREST

## 2025 INDEPENDENT FOREST AUDIT

Independent Forest Audits are conducted by independent audit firms selected through a competitive process. The activities of both the forest manager (GreenFirst Forest Products) and the Ministry of Natural Resources are evaluated. The audit for the Romeo Malette Forest has been awarded to **NorthWinds Environmental Services** ([www.northwindsenv.ca](http://www.northwindsenv.ca)), based out of Thunder Bay, Ontario.

**When:** The Independent Forest Audit preparation has begun, with a field audit scheduled to take place the week of October 6-9, 2025.

**Where:** The Forest is in the Timmins District of the Northeast Region of the Ministry of Natural Resources. It overlaps the traditional territories of Flying Post First Nation, Matachewan First Nation, Mattagamí First Nation, Taykwa Tagamou First Nation, Wahgoshig First Nation, Chapleau Cree First Nation and the Métis Nation of Ontario Region 3. All activities between April 1, 2019, and March 31, 2025, will be audited. **Please contact the auditors before October 1, 2025** by email or via the online survey if you have any concerns or compliments about the management of the Romeo Malette Forest.

**Email:** [rburkhardt@northwindsenv.ca](mailto:rburkhardt@northwindsenv.ca)  
(Rike Burkhardt, R.P.F., Lead Auditor)

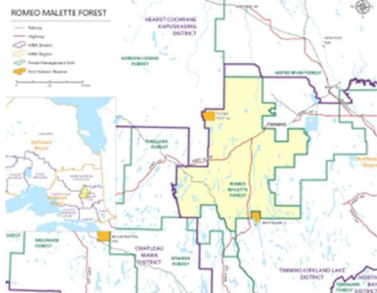
### ONLINE SURVEY

To access an online survey and provide your input, scan the QR code with your phone camera or use this link:  
<https://www.surveymonkey.com/fr/9CYCT7B>



### WHAT ARE INDEPENDENT FOREST AUDITS?

Independent Forest Audits take place every 10-12 years and are required by law under Ontario's *Crown Forest Sustainability Act*. The 2025 audit is evaluating the management of the Romeo Malette forest to make sure that it is consistent with sustainable forest management requirements, as defined in current legislation and policy. For more information:  
<https://www.ontario.ca/page/independent-forest-audits>



*Personal information is collected under the authority of Regulation 319/20 (Independent Forest Audits) made under the Crown Forest Sustainability Act. It will be used by the NorthWinds Environmental Services, the Natural Resource Advisory Committee, the Natural Resource Advisory Committee, Resource Management Advisory Committee, the Forestry Futures Committee and MNR for the purposes of developing an understanding of forest management concerns and issues for the delivery of the Independent Forest Audit. Please contact Ernie Demuth, MNR Senior Program Advisor, [ernie.demuth@ontario.ca](mailto:ernie.demuth@ontario.ca) for more information about the collection and use of this personal information.*

**Figure 3. Public notice map.**

The public notice and poster included the purpose of the audit, identification of the management unit being audited, the period of the audit, how the public may provide input and information about the collection and use of personal information for audit purposes.

Five responses were received via survey and email, representing two members of local First Nations, one member of the public, one recreational user and one road-based tourism operator. Two respondents identified the use of herbicide as a concern, the other response concerned operations near private land that was ruled out of the audit scope.

### First Nation and Métis Consultation

All of the First Nation and Metis communities on the FMP list were contacted as per the advice of the Timmins District Resource Liaison Officer assigned to the Romeo Malette Forest. This included an email in the pre-audit stage, as well as two email invitations prior to the field audit in September. The audit findings considered information provided through interviews during

the field audit and follow-up emails, as well as an email response provided from the Director of Lands and Resources, Missanabie Cree First Nation.

### **Timmins Local Citizens Committee (LCC)**

The LCC received information about the 2025 IFA at a meeting prior to the audit, where members were invited to participate. Two members of the LCC participated in the field audit and a presentation of preliminary findings was provided to the LCC, including the First Nations representatives who provided input to the audit.

### **Licenses, Contractors and Commitment Holders**

Representatives from GreenFirst and Interfor attended the field audit for both truck field days and were interviewed. There were no issues brought forward during the discussions. Follow up discussions were held with GreenFirst staff to clarify draft audit findings. Review comments were provided on the draft audit findings and report.

### **Ministry of Natural Resources**

MNR District, Region and Divisional Support Branch staff participated in all aspects of the audit, including the field audit and interviews. Follow up communications were exchanged with applicable MNR staff to clarify draft audit findings. Review comments were provided by MNR staff on the draft findings and audit report.

### **Forestry Futures Trust Committee**

The Forestry Futures Trust Committee participated in all audit meetings, as well as the field audit and review of draft documents.

## APPENDIX 5 LIST OF ACRONYMS

---

ACOP	Annual Compliance Operations Plan
ACP	Annual Compliance Plan
AOC	Area of Concern
AR	Annual Report
AWS	Annual Work Schedule
CFSA	Crown Forest Sustainability Act
CP	Contingency Plan
FAP	Forest Aggregate Pit
FIM	Forest Information Manual
FMP	Forest Management Plan
FMPM	Forest Management Planning Manual
FOP	Forest Operations Prescriptions
FOIP	Forest Operation Information Program
FRI	Forest Resources Inventory
FRL	Forest Resource Licence
FRT	Forest Renewal Trust
FSC	Forest Stewardship Council
FTG	Free-to-Grow
IFA	Independent Forest Audit
IFAPP	Independent Forest Audit Process and Protocol
IQR	Inter-Quartile Range
LCC	Local Citizens' Committee
LIO	Land Information Ontario
LTMD	Long-Term Management Direction
MNR	Ontario Ministry of Natural Resources
NRIP	Natural Resources Information Portal
NWES	NorthWinds Environmental Services
RAP	Regeneration Assessment Protocol
R.P.F.	Registered Professional Forester
SAR	Species at Risk
SEM	Silvicultural Effectiveness Monitoring
SFL	Sustainable Forest Licence
SGR	Silviculture Ground Rule

SPF	Spruce-Pine-Fir
SRNV	Simulated Range of Natural Variation
WSFG	Well-spaced Free-growing

## APPENDIX 6. AUDIT TEAM MEMBERS AND QUALIFICATIONS

<b>Name</b>	<b>Role</b>	<b>Responsibilities</b>	<b>Credentials</b>
<b>Rike Burkhardt, M.F.C., R.P.F.</b>	Lead Auditor	<p>Review of the following audit procedures:</p> <ul style="list-style-type: none"> <li>• Local Citizens Committee</li> <li>• First Nation and Métis consultation</li> <li>• public consultation</li> <li>• contractual obligations</li> <li>• socioeconomic impacts</li> <li>• achievement of management objectives</li> </ul>	25+ years experience in forestry and natural resource management. Extensive experience in stakeholder engagement and First Nation and Métis interests in lands and forests. She has been an audit team member on 12 IFAs.
<b>Deanna Hoffman, R.P.F.</b>	Auditor	<p>Review of the following audit procedures:</p> <ul style="list-style-type: none"> <li>• forest management planning, monitoring and reporting</li> <li>• achievement of management objectives</li> <li>• silviculture and financial reporting</li> <li>• contractual obligations</li> <li>• ecological values management planning and implementation</li> </ul>	30+ years of experience as a forester and SFL general manager in forest management planning, financial planning and oversight, silviculture, forest operations, forest tenure, and Indigenous relations and capacity building.
<b>Scott Koski, Certified Compliance Inspector</b>	Auditor	<p>Review of the following audit procedures:</p> <ul style="list-style-type: none"> <li>• operations and compliance</li> <li>• contractual obligations</li> <li>• achievement of management objectives</li> </ul>	20+ years of experience in forest operations, harvesting supervision and compliance monitoring. He is currently mentoring compliance inspectors in training.
<b>Triin Hart, Ph.D.</b>	Audit advisor	<p>Advise as necessary on the following audit procedures:</p> <ul style="list-style-type: none"> <li>• ecological values management planning and implementation</li> </ul>	Expertise in landscape ecology, SAR, emulating natural disturbances, development of natural landscape condition templates and analyses of ecological implications of management activities.