Public Summary Report for Forest Management
2012 Annual audit
Report for:
Chabot, Pomerleau et associés inc.
in
Magog, Quebec
Canada

Report Finalized: October 24, 2012
Audit Dates: July 2, 3 and 4 2012
Audit Team: Ugo Lapointe
Pascal Audet

Certificate code(s): SW-FM/COC-005585
Certificate issued: August 31, 2011
Certificate expiration: August 30, 2016

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Magog, Quebec J1X 2A4

The only official version of this report is the French version. The report below is a translation of the French.

NOTE: More detailed public summary available in French at http://info.fsc.org/
1. **AUDIT PROCESS**

1.1. **Auditors and qualifications**

<table>
<thead>
<tr>
<th>Auditor’s name</th>
<th>Qualification</th>
<th>Position</th>
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</thead>
<tbody>
<tr>
<td>Ugo Lapointe</td>
<td>M. Sc.</td>
<td>Lead auditor and ecological aspects</td>
</tr>
<tr>
<td>Pascal Audet</td>
<td>Ing. F.</td>
<td>Forester</td>
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1.2. **Overview of sites visited**

<table>
<thead>
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<th>Type of site</th>
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<tr>
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<td>Other sites:</td>
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## 2. AUDIT FINDINGS AND RESULTS

### 2.1. Changes in the forest management of the Forest Management Enterprise (FME) and/or standard and stakeholder issues

<table>
<thead>
<tr>
<th>☑</th>
<th>Issue</th>
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<tr>
<td></td>
<td>Changes in the forest management of the FME have occurred since the last audit</td>
<td>No changes</td>
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<tr>
<td></td>
<td>Changes in the forest management standard used for audit have occurred since the last audit</td>
<td>No changes</td>
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</table>
| ☑ | Stakeholder comments on the forest management of the FME were received | Comment summary and RA response:

**Comment:**
A neighboring owner of a forest managed by Chabot, Pomerleau et associés (CPA), filed a complaint after some machinery passed on his land during silvicultural activities. When the tractor passed through it broke approximately 6 maple saplings.

**RA response:**
The FSC standard requires that a proper dispute resolution mechanism be implemented by the applicant to resolve disputes related among other things to use rights. Interviews with the complainant and staff of the FME show that the dispute resolution mechanism functions well since communication was quickly established between CPA and the complainant after the incident. After CPA was made aware of the complaint they immediately made a compensation proposal which had not been accepted by the complainant at the time of the audit. Note 2.3.2/12 is issued to ensure a follow up on this matter during the next annual audit.

**Comment:**
A First Nation representative claimed to be awaiting an answer from CPA to obtain a map of the territory while another FN representative indicated that there had been discussions with CPA in order for community members to be granted access to some lots to harvest some traditional resources.

**RA response:**
During the audit, CPA demonstrated that efforts were made to communicate with First Nations. However, interviews with FNs showed that there is still progress to
Rainforest Alliance Forest Management Annual Audit Report - this version is a translation. The official version of this report is the French version.

be made as certain FN representative are awaiting responses from CPA. The FME must continue to communicate with FNs to collect information relevant to its management scope. Note 3.3.2b/11 stays opened to ensure a follow-up on CPA’s efforts.

2.2. Conformance with applicable corrective actions

The section below describes the activities of the certificate holder to address each applicable corrective action issued during previous evaluations.

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Report section: Appendix III, Criterion 3.1.1b and 9.2.1

NC description and associated evidence:

CPA has initiated communications with eight Aboriginal Nations (six First Nations and two Métis). The results for three Aboriginal nations meet the requirements of the standard either because the available information on traditional rights is available or because First Nations are presently documenting this information and have shown openness to share with CPA. These three First Nations are:

- Abénaki
- Waban-Aki Nation, communities of Wôlinak and Odanak
- Hurons Wendat

CPA sent a letter in French to describe in a qualitative manner the boundaries of the candidate territory (without map) to the general inbox of the three Mohawk First Nations. Only Kahnawake responded, but did not provide available information to CPA and suggested to CPA to use an ethnologist. Since the standard specifies that the manager must be familiar with available information, CPA will not have to call upon the ethnologist to meet the requirement of this indicator.

- Regarding the two other First Nations and two Métis: Kahnawake Kanesatake has not responded to CPA;
- Akwasasne did not respond to CPA’s request;
- The two Métis communities have responded to CPA.

The lack of response from these Communities cannot be seen as a lack of interest to share available information about their legal rights with CPA. It is the applicant’s obligation to use the appropriate language to achieve the indicator requirements, and sending a single letter to a general inbox is not a sufficient effort. Contacted by telephone by the auditors, one of the Mohawk First Nations has confirmed that it had sites of interest in the Montérégie and Estrie regions, and were not aware of the letter from CPA.

Interviews by SW show that CPA does not have all the available information for all First Nations with traditional uses in CPA’s territory of action. CPA will have to make more efforts to obtain available information on First Nations’ traditional rights in the region.

Related Evidence:

- CPA-lettre aux intervenants.doc
- Communications with First Nations with interests in the territory
Corrective action request: The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

Timeline for conformance: By the next annual audit

Evidence provided by organisation:
- Results from interviews between CPA and First Nations
- First Nation File
- Interviews with CPA staff

Finding after reviewing evidence:

To meet the requirements, CPA presented to the auditors a First Nation File that included the information collected by the FME which includes information accessible on the internet and information obtained from First Nations and specialists.

As of February 23, 2012, CPA transmitted English letters to the band councils of the six First Nations involved. The letters indicated that CPA wished to obtain more information on First Nation’s land use and claims. Delivery confirmations kept by CPA show that the letters had been received by the recipients; however, the FN did not answer the FME’s request.

Other information was obtained by communicating by telephone with First Nation’s band councils. The auditor’s verification with FN representatives identified by CPA show that there was contact and exchanges in most cases.

**Mohawk First Nations**

A Mohawk FN indicated that its territory covered the North-East of Montreal but not the regions of Estrie and Montérégie. Therefore, this FN has no interests in the territory managed by CPA. Another Mohawk FN indicated having interests in the region concerned by the forest management. During the audit, the FN representative contacted by the auditor was awaiting a map of private lands managed by CPA in order to determine if regions of interests for the community were affected. Even with documented efforts CPA was unable to communicate with another Mohawk FN. However, the auditor was able to contact a representative from this community and indicated that they did not have the necessary resources to determine if private lands managed by CPA are part of interest sites to them. She indicated that white birch and medicinal plants are key resources to Mohawks.

**Abénaquis, Waban-Aki, Wôlinak and Odanak Nations and Hurons Wendat**

Through various contacts within these First Nations or people employed by them, CPA collects information. Among other things, CPA has meetings with a land management specialist employed by one of the FNs. During an interview with the auditor, this specialist indicated that he had meetings and discussions with CPA to identify sites of importance such as burial sites and possible partnerships between CPA and their clients (private owners) in order to allow access to essential resources such as large game animals, black Ash, white Birch and medicinal plants. These elements qualify as HCVs and are taken into account by CPA. The knowledge acquired by CPA is incomplete but this is due in part by FNs lack of resources to trace sites of ecological, economic and cultural importance. At least two FN contacted by the auditors indicated being in the process of acquiring knowledge and identifying interest sites in the
short term. CPA’s people in charge indicated that they would maintain their efforts to communicate with FNs to continue or begin discussions.

**Métis**
Attempts to communicate with the Alliance Autochthones about the certified territory did not have any results.
CPA demonstrated that its consultation process to identify HCVs was appropriate since through it they identified HCVs related to FN values. During the audit, CPA was in the process of integrating this information to its HCVF geomatic layers in order for them to be taken into account during management plan elaboration.
Finally, the FME’s person in charge demonstrated that he was familiar with the collected information related to FNs. Therefore, the FME is in conformance with indicator 3.1.1b and the NCR can be closed.

**NCR Status:** CLOSED

**Comments (optional):**

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**NC description and associated evidence:**

Indicator 3.3.1b requires that CPA collect and document the public information on sites of cultural, ecological, economic or spiritual importance to First Nations that have been collected by the relevant authorities or have been identified during the public consultation process. But CPA did not provide any information to auditors about the Mohawk sites on the territory covered by the certification. The auditors’ verification with Mohawks authorities confirms that some First Nations do have sites of interests and values in Estrie and Montérégie, there is therefore non-conformance.

**Related Evidence:**

- Letters and emails from CPA to the Mohawk communities
- Communications with First Nations with interests in the territory

**Corrective action request:**

The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.
Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:**

By the next annual audit

**Evidence provided by organisation:**

- Communications with First Nations having interests on the territory.
- Name and contact information of FN representatives contacted
- Interviews with FN representatives
- File containing public information related with FN territories and values
- Interviews with CPA staff

**Finding after reviewing evidence:**

To meet the requirement, CPA collated public information and information provided during consultations with First Nations (see finding NCR 01/11). More precisely, CPA’s file “First Nations” now contains information on territorial claims of the three Mohawk First Nations. Efforts to communicate with FNs allowed the identification of a FN without interests.
in the region. Discussions with one of the other two FNs have begun and indicate that it will continue. As for the third FN, registers show that sustained efforts were made by CPA to contact them. During an interview with the auditor, this FN’s representatives indicated not having enough resources to identify sites of interest but identified forest resources important to the community. Note 3.3.2b/11 remains open to ensure that during the 2013 audit, the auditors verify if CPA followed up with Mohawk First Nations.

CPA trained field workers with the help of First Nation specialists in order for them to be able to identify FN burial sites when conducted forest inventories. If CPA employees or group members discover a site of interest, they advise the concerned FN to get confirmation of its authenticity. In addition, CPA obtained the location of sites of interests for some communities. During the audit, CPA was in the process of integrating this information to its HCVF geomatic layer in order for them to be taken into account during management plan elaboration. Even if the identification of sites of interest is not finished, some sites were identified and CPA showed that they have made efforts to collate a maximum of information on cultural, ecological, economic or spiritual sites of interest to FNs, the NCR is closed.

NCR Status: CLOSED

Comments (optional):

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NC description and associated evidence:

Results do not include FSC additional requirements, such as the impact of not harvesting in HCVF, sites of threatened or vulnerable species and ecosystem based management strategies. CPA strategies for conformance with the FSC Standard have an impact on allowable cut calculations, but auditors have no indication that CPA takes the necessary measures to reduce harvest rates accordingly. This is the subject of this NC.

In addition, the result of volumes taken from timber harvested in private forests excludes round timber export volumes and volumes delivered to mills of 2,000 cubic meters and less, so they are not recognized in the results of volumes harvested.

The analysis allows to record, for the 2007 and 2008 seasons for the territory of Estrie, an excess of the allowable cut for Poplar (D group). Excess harvest and mortality associated with the maturity of poplars could in the longer term create an inventory shortage. The assessment of potential shortage was not presented to the SW auditors. This could have an impact on levels of sustainable exploitation in regards to CPA strategies.

Currently, the measurement system in private forests cannot distinguish the volumes taken by species and by product. That is to say, it is not possible to verify, via the measurement system, that harvest by particular species and not by specific combination of species as is the case now, does not exceed the allowable cut. This system does not evaluate or compare the volumes harvested with allowable cut calculations. It is not possible to know if there is conformance with the allowable cut for some specific tree species and by product groups.
**Related Evidence:**
- PRDIRT – section 9.5.pdf
- MCPA – section 3.4.2.pdf
- Fichier Excel interne.xls
- Private Forest Development Plan – section referring to annual cut calculations

**Corrective action request:**
The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:**
By the next annual audit

**Evidence provided by organisation:**
- Allowable cut calculation
- Allowable cut updated documents
- Hammering compiling sheet
- F/11 Form

**Finding after reviewing evidence:**
CPA completed its allowable cut calculation which was established for each species and corresponds to the growth rate for all certified properties. The calculation is conducted on each age group coincidently and changes to age structure of the managed forest cannot be considered.

Incidentally, the calculation considers all withholdings related to the FSC standard including harvest withholdings or other adapted management practices in HCVFs, sites of threatened or endangered species and the decrease of forest possibility due to CPA’s ecosystemic management strategy. CPA’s allowable cut calculation does not take into account the positive effects that silvicultural treatments can have on growth. This underestimates the possibility and therefore this is considered a precautionary approach.

To ensure that certified members that carry out their own harvest without CPA’s help are considered in the calculation, CPA requires its members to provide a declaration (Form F/11: “Summary of work carried out during the year by the owner or its forest counsellor”).

To ensure accountability and ensure monitoring of annual allowable cut, declared harvest volume and volume delivered (including delivery of less than 2000 cubic meters) are collated and compared to the annual allowable cut calculation.

Harvested volumes are calculated by species group according to specifications from wood transformation industries, which is acceptable since the vast diversity of species and small size of operations. The annual verification allows CPA to respect its allowable cut calculation in the long term. Incidentally, it is impossible for CPA to project an allowable cut since the territory under management constantly changes due to the addition or withdrawal of members and to the fact that harvest related work is not planned as far ahead in private forests. However, annual control measures to respect the allowable cut and calculation method of the allowable cut implemented by CPA allow ensuring that the allowable cut will be respected each year on a 10 year period.

The procedures implemented by the FME meet the requirement. The NCR can be closed.

**NCR Status:**
CLOSED

**Comments (optional):**
### NCR 04/11

**Classification of NC:** Major

**Standard & indicator:** Rainforest Alliance Locally adapted Standards for Assessing Forest Management in the Great Lakes/Saint- Lawrence region – August 2010, Indicator 6.2.3

**Report section:** Appendix III, criterion 6.2

**NC description and associated evidence:**

CPA does not have all the recovery plans for species at risk and/or species likely to be present on its territory. This is a non-conformance with the requirements of Indicator 6.2.3.

**Related Evidence:**
- Preliminary assessment of forests of high conservation value: *Territoire du Corridor Appalachien de l’Estrie and de la Montérégie*
- Regional integrated natural and territorial resources management plan - Portrait of the natural forest and ecological issues in the Estrie region
- Interviews conducted
- Consultation of available documentation available in CPA files

**Corrective action request:** The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:** By the next annual audit

**Evidence provided by organisation:**

Endangered species list and applicable measure from the rehabilitation plan

**Finding after reviewing evidence:**

To meet the requirement, CPA listed threatened or endangered species (see Note 6.1.2/12) for which a rehabilitation plan exists. The auditors verified that all plans applicable to the FME’s activities were included. CPA included in its procedures the measures from the rehabilitation plans that will be applied when planning silvicultural treatments. The measures foreseen are adapted to the scope of work, species and their habitats and take into account the precautionary principle as well as the awareness activities for members/private owners. These measures meet the requirement and the NCR can be closed.

**NCR Status:** CLOSED

**Comments (optional):**

### NCR 05/11

**Classification of NC:** Major

**Standard & indicator:** Rainforest Alliance Locally adapted Standards for Assessing Forest Management in the Great Lakes/Saint- Lawrence region – August 2010, Indicator 6.3.1

**Report section:** Appendix III, criterion 6.3

**NC description and associated evidence:**

CPA did not set long term quantitative targets to regain the natural forest condition. The concept of connectivity has not been addressed by the applicant at the landscape scale. This is a non-conformance with the requirements of Indicator 6.3.1.
No link was established between the objectives of the forest and the desired objectives of the Forest management plan. For example, a link must be established between the tree marking requirements and diversity of desired forest structure concerning the desired future condition of the long term desired forest.

**Related Evidence:**

- CPA Forest or Wildlife management plan
- Natural forest portrait
- CPA Procedures manual

**Corrective action request:**
The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.
Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:**
By the next annual audit

**Evidence provided by organisation:**
Addition of HCVF description and mitigation measures
Documentation:
- 3.4.2.2.18 FHVC
- 3.4.2.2.15 connectivité
- Formulaires des suivis des aménagements (F14.X)

**Finding after reviewing evidence:**
To meet this requirement, CPA first collated the data necessary to determine the natural and historic variability of the forest mosaic of Estrie and Montérégie. The historic portraits are based on historic portrait of the forest published by the “Conférences régionales des élus pour l’Estrie et pour la Montérégie”. This information is briefly summarized in the General Sustainable Management Plan (FSC) and served to implement long term targets that will allow a decrease of the gaps between the current and historic forest mosaic. The main long term targets implemented by CPA and required by the FSC standard are:

**Forest type diversity:** increase species groups’ relative abundance currently underrepresented compared to their relative historic abundance (the relative proportions targeted are indicated in the MPCPA, section 3.4.2.2.2). These species groups are mainly composed of the following species; red spruce, yellow birch, fir, beech, sugar maple, hemlock, red oak, white pine and elm.

**Age groups diversity:** increase the abundance of old stands so that age groups are equally distributed for each types of forest canopies (softwood, hardwood or mixed).

**Progressive stages diversity:** maintaining species from stages of mature forest as well as maintaining management strategies that promote irregular residual forest structures notably planning small canopy openings.

**Forest structure diversity:** In addition to small canopy openings, CPA wishes to increase the irregular structure diversity by maintaining 70 snags per ha with a minimum diameter at breast height of 30 cm and 50 wood debris with a diameter of approximately 25 cm or more.

**Level of disturbance at the landscape level:** To ensure that forest connectivity is maintained and to minimize the effects at the landscape level of disturbance, CPA only conducts partial cuts with a merchantable stem sampling fewer than 40%. Protection measures for wetlands and water streams are foreseen.
Short term objectives were also implemented to achieve the long term objectives. An ongoing improvement process allows improving harvest strategies and their implementation if post harvest monitoring reveal that the objectives are not achieved. These objectives meet the requirement and the NCR can be closed.

NCR Status: CLOSED
Comments (optional):

# NCR 06/11 Classification of NC : Major Minor
Standard & indicator: Rainforest Alliance Locally adapted Standards for Assessing Forest Management in the Great Lakes/Saint- Lawrence region – August 2010, Indicator 6.3.2
Report section: Appendix III, criterion 6.3
NC description and associated evidence:
CPA performs selective cutting under an ecosystemic approach. This approach must be defined to restore natural forest conditions. CPA did not identify with the help of professionals any target for the short to medium term to maintain, enhance or restore natural conditions in natural forests, as required by Indicator 6.3.2. This is non-compliant.

Related Evidence:
- CPA Forest or Wildlife management plan
- Natural forest portrait
- CPA Procedures manual
- Stakeholder interviews and field visit

Corrective action request: The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

Timeline for conformance: By the next annual audit
Evidence provided by organisation: Addition of generic targets
Field visit
Increase of proportion followed by inventories
M classified trees over 30 cm are future snags

Finding after reviewing evidence:
To achieve the long term quantitative targets, CPA established a short term objective to increase by 5% at each silvicultural intervention (12 year cycle) the relative abundance of species groups and underrepresented species (see finding from NCR 05/11), the abundance of snags, woody debris and small openings in the forest canopy.
Pre harvest inventory and post harvest monitoring allows to validate if the objectives have been achieved. The pre harvest inventory and post harvest monitoring are compiled in a database and analysed by a software package created by CPA which allows validating if the objectives have been achieved. If they were not to be met, the FME has a system in place to revise and adapt its silvicultural strategies.
Field visits show that the silvicultural strategies were adapted to achieve the short term objectives. These objectives meet the requirement and the NCR can be closed.

NCR Status: CLOSED
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<td><strong>Report section</strong>:</td>
<td>Appendix III, criterion 6.3</td>
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**NC description and associated evidence:**

In the forest-wildlife management plan, qualitative objectives are mentioned as to the wildlife and water potentials and needs. No quantitative target has been determined using specialist for species whose habitat needs are not covered by the coarse filter approach (ecosystem management). This is not in accordance with the indicator 6.3.3.

**Related Evidence:**

- CPA Forest or Wildlife management plan
- HQI data integrated in Private Forest Development Plan
- CPA Procedures manual
- Stakeholder interviews and field visit

**Corrective action request:**
The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:**
By the next annual audit

**Evidence provided by organisation:**

- Rough filter 3.4.2.2.4
- Map identification of what is susceptible
- On site identification with technicians (photo, gps)
- Annual update
- Normal forest to address table p31.
- Discussion with biologist
- CPA’s procedure guide
- Update for implementation of the fine filter

**Finding after reviewing evidence:**

Generally, the implementation of the rough filter as required by indicator 6.3.1 allows maintaining habitat diversity in a proportion representative of their natural occurrence if the landscape was dominated by natural disturbance regimens within a variety of spatial scales. Consequently, the FME’s ecosystemic management strategy meets the rough filter’s objective since it allows conservation of biodiversity by maintaining proper habitats for a diversity of wildlife and flora species. Some species for which habitat needs are not entirely covered by the rough filter such as in the case where the species depends on rare types of ecosystems may require the implementation of a fine filter approach.

The applicant implemented fine filter procedures that include quantitative objectives to maintain the habitat of endangered species. In fact, CPA implemented procedures to preserve the habitat of some species designated as endangered, threaten or concerning, susceptible of being designated as endangered, threaten or concerning by the MRN or the COSEWIC (see species list in the updated MPCPA, pages 30-40).
Habitats protected by the fine filter measures (that were not covered by the rough filter) are: the contour of rocks or caves (to maintain shelters and hiberna shelters of bat species susceptible to be present, water stream shores and wetlands will be preserved to maintain proper habitat for other species such as turtles, tree frogs, salamanders, water snakes and some bird species (see species list in the updated MPCPA, pages 30 to 40). CPA demonstrated its conformance with indicator 6.3.3 and the NCR can be closed.

NCR Status: CLOSED

Comments (optional): The measures related to maintaining Barrow’s goldeneye habitat should be removed from the list since this species’s distribution area is located in North-East Quebec in boreal forests. Note 6.3.3/12 is issued to ensure that a follow up is made on new measures more specifically on those related to the maintenance of a protection band around caves or large rocks.

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<td>Appendix III, criterion 6.3</td>
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NC description and associated evidence:

Forest inventories carried out by CPA before treatment do not define the amount of residual structure to keep following harvest operations in partial cuts and clearcuts. The FSC standard requires that residual structures represent approximately the proportion of live trees left by natural disturbances and that the manager identify specific targets for retention of these residual structures. CPA did not identify specific objectives and does not verify that the harvest leaves residual structures in sufficient quantity and distribution to perform their ecological functions. In addition, the intervals for the maintenance of various structures within the forest planning are not mentioned. This is a non-conformance with indicators 6.3.8 and 6.3.9.

Related Evidence:

- CPA Forest or Wildlife management plan
- Natural forest portrait
- CPA Procedures manual
- Stakeholder interviews and field visit

Corrective action request: The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

Timeline for conformance: By the next annual audit

Evidence provided by organisation: CPA’s Sustainable Forest-Wildlife Management Plan Procedure guide Interviews with stakeholders and field visits

Finding after reviewing evidence: CPA implemented precise objectives to leave residual structures that approximately represent the live tree proportion left by disturbances. The
objectives are described in the FME’s procedure guide and cover the retention of live trees, snags (70/ha) and woody debris (50 debris of over 25 cm) in partial cuts as well as small canopy openings (see finding of NCR 05/11). The established objectives meet the requirement and the NCR can be closed.

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**NC description and associated evidence:**

CPA does not monitor its plantations of exotic species. The applicant is not able to detect adverse impacts to the environment from the use of exotic species in plantations. This is a non-conformance with the requirement of Indicator 6.9.1.

**Related Evidence:**

- Interviews conducted and field visits
- CPA Procedures manual
- Form F-21

**Corrective action request:**

The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:**

By the next annual audit

**Evidence provided by organisation:**

- Letter from the MRN
- Plant attribution

**Finding after reviewing evidence:**

CPA contacted the MRN to obtain information on negative impacts of Norway spruce on the environment that was identified in Quebec. The MRN provided a study entitled: Régénération naturelle de l’épinette de Norvège au Québec: aucun signe d’envahissement which shows that there are no signs of invasion in the contours of Norway spruce plantations. Furthermore, the results of a study conducted in the East of Quebec on Norway spruce plantations entitled: Is the use of trees with superior growth a threat to soil nutrient availability? A case study with Norway spruce dating from 1969 to 1976, shows that in the short term these plantations did not result in soil depletion. The auditors understand that the plantations cover small areas and that this specie is non-invasive and that no short term soil depletion results from the plantations. However, the standard requires that exotic species be monitored whether they are invasive or not and without regard of their impact on soil fertility. CPA conducts this monitoring but it must be improved. OBS 10.8/12 is issued to ensure the improvements needed are done.

Since CPA conducts monitoring of exotic species, the NCR can be closed.

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### NC description and associated evidence:

CPA does not have all the recovery plans for species at risk present and/or likely to be on its territory. The HCVF report does not present all HCVF values in the territory, so it is incomplete. Several elements of allowable cut calculations do not conform to the indicator 5.6.1. The justification for harvest volumes and choice of species is absent or must be improved in management plans.

Knowledge about the historical and cultural resources of First Nations is to be improved. Within management plans, some goals and targets are qualitative and in some cases quantitative, they are not connected to the portrait of the natural forest and have not been reviewed by experts. There are no goals in the different plans in regards to habitat for some species. These elements constitute a failure to conform to the requirements of indicator 7.1.1a.

### Corrective action request:

The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

### Timeline for conformance:

By the next annual audit

### Evidence provided by organisation:

CPA’s forest or wildlife Management Plan and silvicultural prescriptions

### Finding after reviewing evidence:

CPA implemented many complimentary documents that can be considered as part of the member’s file (private owner) since these documents improve the management plan. In addition, CPA has rehabilitation plans for endangered species present on its territory (see finding 04/11) and filled in the gaps in the allowable cut calculation (see finding 03/11).

CPA’s procedure 3.4.2.2.16 justifies the volumes harvested and the choice of species.

Furthermore, CPA has knowledge on cultural and historic FN resources (see finding 15/11).

Since we take into account the management plan including the complimentary documents and silvicultural prescription the requirements of 7.1.1a are met. More specifically, the objectives and targets related to
habitat are linked to the natural forest portrait and are defined in the complimentary documents (procedures and prescription). The NCR can be closed.

**NCR Status:** CLOSED

**Comments (optional):**

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**Standard & indicator:** Rainforest Alliance Locally adapted Standards for Assessing Forest Management in the Great Lakes/Saint- Lawrence region – August 2010, Indicator 8.1.2

**Report section:** Appendix IV, criterion 8.1

**NC description and associated evidence:**

No performance measure is scheduled for the following: minimizing soil impacts, rutting, maintaining water quality, protection of important sites in terms of biodiversity, maintenance of forests’ ability to produce timber, maintaining residual structures, maintaining wildlife habitat, maintaining the natural forest characteristics, the maintenance of the characteristics defining HCVF and protection of endangered species.

As some monitoring and performance measures are absent on the territory (wildlife, flora and the natural mosaic), it is not possible to verify the objectives and to allow the necessary adjustments. This is a non-conformance with the requirement of Indicator 8.1.2.

**Related Evidence:**

- CPA Forest or Wildlife management plan, CPA Implementation report
- CPA Procedures manual – section 3.4.2., 3.4.3
- Form F-5, F-6, F-7, F-8et F-52.pdf
- Implementation report with Go Book inventory
- Compilation inventaire.pdf
- Stakeholder interviews and field visit

**Corrective action request:** The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:** By the next annual audit

**Evidence provided by organisation:**

- Field form F52
- Form F11
- List of monitoring per client
- Field visits

**Finding after reviewing evidence:** An ongoing improvement system with a complete a functional feedback loop was observed. The main part of the system is Form F52 which is completed during post harvest monitoring to verify the conformance and effectiveness of management strategies to protect sensitive sites. Elements included in the monitoring are:

- Rutting and soil impact
- Maintenance of water quality
- Maintenance of spawning grounds, endangered species, exceptional ecosystems and wildlife habitat and other identified HCVFs
- Adherence to silvicultural treatment
- Maintenance of residual structures

In addition, Form F11 allows analyzing gaps and registering of recommendation of corrections to bring to procedures. The NCR can be closed.

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**NC description and associated evidence:**
CPA does not carry out periodic forest monitoring to take note of changes to important habitat features. This is a non-conformance with the requirement of Indicator 8.2.4. NCR 12/11 is issued because the changes to important habitat features cannot be monitored as no objectives, indicators or targets have been defined by CPA.

**Related Evidence:**
- CPA Implementation report
- Wildlife management plan
- Implementation report with Go Book inventory
- Compilation d’inventaire.pdf
- Stakeholder interviews and field visit

**Corrective action request:**
The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:**
By the next annual audit

**Evidence provided by organisation:**
Verification of compilation forms F53
Field visit

**Finding after reviewing evidence:**
The objectives of CPA’s procedures aim to avoid modification to important habitat characteristics. The habitat characteristics of endangered species are well documented (MPCPA 3.4.2.2.4) and the indicators are monitored. The HCV characteristics that are free of interventions are well documented and monitored. Work prescriptions are defined to resemble natural forest characteristics in the long term. The achievement of those objectives is monitored and documented and adjustments to practices are done when needed.
This meets the requirement and the NCR can be closed.

**NCR Status:** CLOSED

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**Standard & indicator:** Rainforest Alliance Locally adapted Standards for Assessing Forest Management in the Great Lakes/Saint- Lawrence region – August 2010, Indicator 8.2.5

**Report section:** Appendix IV, criterion 8.2

**NC description and associated evidence:**

Monitoring of the environmental impacts of their forest management activities on habitat modification linking forest dynamics and the disturbance regime, connectivity and the degree of landscape disturbance and changes in forest cover at the landscape scale are not achieved.

CPA did not complete monitoring of natural variability and forest history benchmarks, the monitoring of HVC protective measures, and thus is not able to modify the protective measures in place when monitoring results show that a conservation attribute is at risk. This constitutes a non-conformance with the requirements of Indicator 8.2.5.

**Related Evidence:**

- CPA Implementation report
- Form F-14, F-51.pdf
- Wildlife management plan
- Implementation report with Go Book inventory
- Compilation d’inventaire.pdf
- Stakeholder interviews and field visit

**Corrective action request:** The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:** By the next annual audit

**Evidence provided by organisation:**

Documentation:
- CPA Execution Report
- Formulaire F-51.pdf
- Wildlife management plan
- Execution report with Go Book inventory
- Interviews with CPA staff

**Finding after reviewing evidence:**

The indicator requires that environmental monitoring be conducted in conformance with criterion 6.1. This criterion requires that the forest manager considers the local scale (managed forests) and the landscape scale (contours of the territory under forest management) while being adapted to the scale and intensity of forest management. Silvicultural works carried out by CPA (low intensity partial cuts) allow to maintain the forest canopy at the landscape scale (as per FSC standard). Therefore, interviews with CPA staff and verification of post harvest monitoring forms indicated that CPA takes into account the effect of their activities on the
landscape by documenting windfall episodes that would create significant canopy openings.
At the harvested stand scale, CPA implemented its procedures to document its inventory conducted pre and post harvest as well as monitoring 2 and 4 years after harvest. The monitoring enables CPA to determine if silvicultural activities respected the Rule on SOPs. The environmental monitoring conducted allows registering negative impacts on sensitive sites and HCVs such as identified sensitive or threatened species habitats as well as wetlands and soils. Furthermore, the monitoring results are entered in a database to follow the evolution of the structure and composition of the forest under management. The NCR can be closed.

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<td>Appendix IV, criterion 8.2</td>
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**NC description and associated evidence:**
As the HCV process is not complete, the monitoring of high conservation values cannot be done. In addition, CPA did not present particular terms for protection and monitoring of each of the identified HCV. This constitutes a non-conformance with Indicator 8.2.6. CPA can therefore not re-evaluate the measures for maintaining HCV when monitoring shows that there is a risk to the conservation attribute, or modify protection measures accordingly. This is a NC with Indicator 8.2.7.

**Related Evidence:**
- CPA Implementation report
- CPA Procedures manual – Section 3.4.2.1 and 3.4.3.1
- Management plan
- Implementation report
- Digital layers
- Stakeholder interviews and field visit

**Corrective action request:**
The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:**
By the next annual audit

**Evidence provided by organisation:**
- MPCPA – Sections 3.4.2.1 et 3.4.3.1
- Management Plan
- Execution Report
- Digital layers
| Finding after reviewing evidence: | CPA determined measures of long term protection and monitoring that allow continuous improvement of forest management strategies. These measures are mainly applicable to categories 1 and 3 to 6 (see category description in appendix of the GLSL standard). More precisely, other than the fact the CPA does not conduct any activities in these HCVFs, buffer zones of variable sizes are maintained outside these HCVFs. The same strategy applies when HCVFs are identified outside, but on the borders of the territory under management. HCVF monitoring is conducted after harvests (see note on conformance from criterion 9.4 below). CPA does not carry out activities in HCVFs but HCVFs of category 2. In category 2 HCVFs, the FME conduct low intensity (partial cuts) activities that maintain the forest canopy. However, carrying out partial cuts to maintain the forest canopy or to simply not harvest at all within HCVFs and leaving buffer zones does not guarantee the preservation of HCVs. This is why the FME implemented a monitoring system for HCVs. In the case where an HCV was affected by silvicultural treatments (e.g. significant opening in the forest canopy of a category 2 HCVF following a windfall), the FME implemented a self issued corrective action system to correct the situation. These measures meet the requirement and the NCR can be closed. |
| NCR Status: | CLOSED |
| Comments (optional): | |
| # NCR | 15/11 | Classification of NC : | Major | Minor |
| Standard & indicator: | Rainforest Alliance Locally adapted Standards for Assessing Forest Management in the Great Lakes/Saint- Lawrence region – August 2010, Indicator 8.2.8 |
| Report section: | Appendix IV, criterion 8.2 |
| NC description and associated evidence: | CPA management activities are regularly conducted in urban environments. The applicant has not completed the identification and recognition of values, resources and cultural practices in order to monitor them. Currently, Aboriginal cultural values are not necessarily all known to CPA. It is therefore not possible to monitor them. This constitutes a non-conformance with the requirement of Indicator 8.2.8. |
| Related Evidence: | • CPA Implementation report  
• Form F-14.pdf  
• Management plan  
• Implementation report  
• Digital layers  
• Stakeholder interviews |
| Corrective action request: | The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance. |
**Timeline for conformance:** By the next annual audit

**Evidence provided by organisation:**
- Digital layer
- Interviews with stakeholders

**Finding after reviewing evidence:**
- CPA finalized the process of identification and acknowledgement of values, resources and cultural use. The corrections made to the procedures show that mitigation measures were established for the various HCVs. Form F52 monitors it. The NCR can be closed.

**NCR Status:** CLOSED

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**Standard & indicator:** Rainforest Alliance Locally adapted Standards for Assessing Forest Management in the Great Lakes/Saint- Lawrence region – August 2010, Indicator 9.1.1b

**Report section:** Appendix IV, criterion 9.1

**NC description and associated evidence:**

CPA, with the help of stakeholders, has not completed the task of identifying HCVF and monitoring measures, and necessary actions to protect these values in its territory. Although it does not operate within HCVF, CPA has not shown to SW auditors that it conducts all necessary actions to protect HCV when it undertakes operations within the limits of these. This constitutes a non-conformance with the requirements of the indicator 9.1.1b. The precautionary principle and the lack of operations in HCVF do not in all cases ensure the retention of conservation values, since operations along these can, in some cases, impact on the protection of these values.

**Related Evidence:**
- Interviews conducted and field visits
- CPA Procedures manual
- Preliminary assessment of forests of high conservation value: Territoire du Corridor Appalachien de l’Estrie and de la Montérégie

**Corrective action request:** The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:** By the next annual audit

**Evidence provided by organisation:**
- CPA Procedure Guide
- Évaluation préliminaire des forêts à haute valeur de conservation : Territoire du Corridor Appalachien de l’Estrie et de la Montérégie
- CPA’s HCVF database
- Interviews with staff

**Finding after reviewing evidence:**
- CPA collated information from diverse sources (procedure guide, section 3.2.2.18, pages 74-75) to implement it HCVF list. Some organizations present on the territory had already identified HCVFs such as the MRCs and municipalities (CRE) as well as the Appalachian Corridor (ACA). The HCVF evaluation process of these organizations included consultations with the public and stakeholders. However, only the CRE of Estrie share a part of its evaluation with CPA while the CRE of Montérégie Est has yet
to make the results of their evaluation public. The HCVFs identified by the ACA and the CRE of Estrie do not cover all the regions under CPA’s management neither as all HCVF categories that must be evaluated. To complete its list, CPA integrated information on exceptional forests and wildlife and plant species habitats from the Centre de données sur le patrimoine naturel du Québec, the COSEWIC, the MDDEFP, MRN, the Agence de mise en valeur de la forêt privée de l’Estrie, the UICN red list. Furthermore, data on sites of environmental value from Canards illimités were integrated. Consultation efforts allowed to identify sites of high conservation value to FNs. Finally, the available information from ecoforestry maps allowed CPA to complete the identification of large core forests the least fragmented in the region of Montérégie and in Estrie. These elements are integrated and updated annually within a geomatic layer. Therefore, when establishing new management plans and before the preparation for silvicultural treatments, the HCVFs present within or near the managed forests are identified on the map and protection measures are applied.

CPA does not carry out activities in HCVFs except for HCVFs of category 2. In category 2 HCVFs, the FME conduct low intensity (partial cuts) activities that maintain the forest canopy. Maintenance of the forest canopy is monitored post harvest (verification of windfall presence in the year following harvest and 2 and 4 years later as well as at the renewal of the forest management plan).

CPA applies various protection measures for HCVFs of categories 1 and 3 to 6 (as defined by FSC and presented in the MPCPA, page 71), that depend on the nature of the sensitive site to protect and on the protection measures required by law, municipal regulation or on protection organizations. Some of these measures are specified in the MPCPA, pages 73-74). More specifically, other than the fact that CPA does not conduct management activities within categories 1 and 3 to 6 HCVFs, buffer zones of variable size are preserved outside these HCVFs. The same strategy is applied when HCVFs are identified outside, but on the contour of the forests managed. HCVF monitoring is conducted post harvest (once again see Note on conformance at criterion 9.4 below). These elements meet the requirement of the FSC standard and the NCR can be closed.

NCR Status: CLOSED

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NC description and associated evidence:

CPA does not have a long term HCVF management strategy to ensure that the quality of their attributes and their areas are not diminished. This constitutes a non-conformance with the requirements of Indicator 9.3.1.

Related Evidence:
- Interviews conducted and field visits
- CPA Procedures manual
- Preliminary assessment of forests of high conservation value: *Territoire du Corridor Appalachien de l’Estrie and de la Montérégie*

**Corrective action request:**
The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:**
By the next annual audit

**Evidence provided by organisation:**
Documentation:
- CPA’s procedure guide
- Évaluation préliminaire des forêts à haute valeur de conservation : Territoire du Corridor Appalachien de l’Estrie et de la Montérégie
- HCVF data base in SIG Arc View
Interviews with staff

**Finding after reviewing evidence:**
CPA determined measures of long term protection and monitoring that allow continuous improvement of forest management strategies. These measures are mainly applicable to categories 1 and 3 to 6 (see category description in appendix of the GLSL standard). More precisely, other than the fact the CPA does not conduct any activities in these HCVFs, buffer zones of variable sizes are maintained outside these HCVFs. The same strategy applies when HCVFs are identified outside, but on the borders of the territory under management. HCVF monitoring is conducted after harvests (see note on conformance from criterion 9.4 below). CPA does not carry out activities in HCVFs but HCVFs of category 2. In category 2 HCVFs, the FME conduct low intensity (partial cuts) activities that maintain the forest canopy.
However, carrying out partial cuts to maintain the forest canopy or to simply not harvest at all within HCVFs and leaving buffer zones does not guarantee the preservation of HCVs. This is why the FME implemented a monitoring system for HCVs. In the case where an HCV was affected by silvicultural treatments (e.g. significant opening in the forest canopy of a category 2 HCVF following a windfall), the FME implemented a self issued corrective action system to correct the situation. These measures meet the requirement and the NCR can be closed.

**NCR Status:**
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**Standard & indicator:**
Rainforest Alliance Locally adapted Standards for Assessing Forest Management in the Great Lakes/Saint- Lawrence region – August 2010, Indicator 9.3.3

**Report section:**
Appendix IV, criterion 9.3

**NC description and associated evidence:**
CPA has not demonstrated that its current strategy for the maintenance or restoration of high conservation values (i.e. not operating within the HCVF) is consistent with the precautionary principle in cases where operations are conducted along a HCVF. CPA did not identify the monitoring measures for HCVF either. The results are therefore not integrated into their management strategy.
This constitutes a non-conformance with the requirements of Indicator 9.3.3.
### Related Evidence:
- Interviews conducted and field visits
- CPA Procedures manual
- Preliminary assessment of forests of high conservation value: *Territoire du Corridor Appalachien de l’Estrie and de la Montérégie*

### Corrective action request:
The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

### Timeline for conformance:
By the next annual audit

### Evidence provided by organisation:
- CPA procedure guide
- Interviews with staff and field visit

### Finding after reviewing evidence:
Globally, the FME has methods that are in conformance with precautionary principal since it does not conduct forest management activities within category 1 and 3 to 6 HCVFs and leaves buffer zones of variable sizes outside these HCVFs and even for those who would be outside or contouring cut blocks. The protection measures for these HCVFs of categories 1 and 3 to 6 (as defined by FSC and presented in the MPCPA, page 71), that depend on the nature of sensitive site to protect and on the protection measures required by law, municipal regulation or on protection organizations. Some of these measures are specified in the MPCPA, pages 73-74).

To ensure these protection measures effectively fulfill their role to maintain HCVFs, CPA implemented a performance monitoring system of its management strategies which includes a verification of the state of HCVFS.

The NCR can be closed.

### NCR Status:
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**Standard & indicator:** Rainforest Alliance Locally adapted Standards for Assessing Forest Management in the Great Lakes/Saint-Lawrence region – August 2010, Indicator 9.4.1

**Report section:** Appendix IV, criterion 9.4

### NC description and associated evidence:
No HCVF annual monitoring system is in place at CPA. In addition, this system is not currently part of planning, monitoring and management accountability procedures.

This constitutes a non-conformance with the requirements of Indicator 9.4.1.

**Related Evidence:**
- Interviews conducted and field visits
- CPA Procedures manual
- Preliminary assessment of forests of high conservation value: *Territoire du Corridor Appalachien de l’Estrie and de la Montérégie*
Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:** By the next annual audit

**Evidence provided by organisation:**
- CPA’s procedure guide
- Interviews and field visits
- Declaration from the certificate manager

**Finding after reviewing evidence:**
The FME implemented a monitoring system for some HCVs to ensure they are maintained or restored.

First, for the monitoring of HCVs from the categories 1, 3, 4, 5 and 6 the FME conducts a post harvest verification of the activities’ conformance and the respect of protection measures. Secondly, the verification addresses also the performance verification of the protection measures of some HCVFs in the case monitoring shows that a HCV was affected negatively by silvicultural treatments (the main HCVs monitored are water streams, wetlands, spawning grounds, rare, threatened or endangered species and exceptional forest ecosystems (EFE). For example, the forms consulted showed that the presence of sediments in the water following culvert construction or management activities close to shore was verified. For category 2 HCVFs, the people in charge indicated that significant canopy openings due to windfalls would also be monitored. Since the company had not been certified for long, it is hard to validate if performance monitoring allows maintaining sensitive wildlife and plant species covered by the HCVFs established by CPA (Note 9.3.3/12 issued).

Finally, the FME implemented a system to self issue corrective action measures to rectify a situation and integrate the new measures to management strategies. Verification of monitoring forms (F52) and of the corrective action register show that the system is functional and that in at least one case the monitoring resulted in the issuance of corrective action as well as modifications to the procedures.

Incidentally, the standard requires a continuous system to evaluate the effectiveness of measures used to maintain or restore HCVs. CPA identified category 2 HCVFs that extend to territories beyond the private forests management by the FME. Consequently, CPA must monitor category 2 HCVFs at the landscape level (examples of landscape variables are: fragmentation, large core forest areas, road density etc.) to evaluate the effectiveness of its own measures and measures adopted by the various regional stakeholders to maintain or improve vast forest at the landscape level. Currently, CPA was not able to demonstrate that they monitored the state of category 2 HCVFs and that this monitoring enabled them to evaluate the effectiveness of the measures to maintain or improve the characteristics of vast forest at the landscape level.

Furthermore, following verification by the auditor with various regional instances it seems that none of them took charge of monitoring large core forests.

The organization’s representatives justified that they were not monitoring vast forests by indicating that CPA’s activities cover small forests and the impacts on large forests would probably be insignificant particularly since CPA conducts partial cuts that maintain the forest canopy and does not result in fragmentation. However, the standard requires that a monitoring be conducted for all HCVs. During the audit, CPA was not monitoring the state of large core forests that were identified as HCVs, the requirements of the indicator were not met.
However, before finalization of the report, CPA removed category 2 HCVFs from its HCVF list since they are outside its activity scope. Also, monitoring such HCVFs requires significant means and maintaining their integrity requires control on the territory that the applicant does not have since he operates on small private land. Therefore, CPA demonstrated its conformance with indicator 9.4.1 and the NCR can be closed.

**NCR Status:** CLOSED

**Comments (optional):** Note 9.3.3/12 verify that performance monitoring allows verifying that sensitive wildlife and plant species covered by HCVF established by CPA are maintained.

<table>
<thead>
<tr>
<th># NCR</th>
<th>Classification of NC</th>
<th>Major</th>
<th>Minor</th>
</tr>
</thead>
<tbody>
<tr>
<td>20/11</td>
<td>Rainforest Alliance Locally adapted Standards for Assessing Forest Management in the Great Lakes/Saint- Lawrence region – August 2010, Indicator 10.1.1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Report section:</td>
<td>Appendix IV, criterion 10.1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**NC description and associated evidence:**

CPA no longer conducts plantation work on the territory in the certification process. However, since 1994, plantations as understood by the FSC definition have been found in the CPA territory. For these plantations, the applicant has not established restoration goals and the planting sites are not explicitly defined.

This constitutes a non-conformance with the requirements of Indicator 10.1.1.

**Related Evidence:**

- Interviews conducted and field visits
- Forest and wildlife management plans

**Corrective action request:** The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:** By the next annual audit

**Evidence provided by organisation:**

- Procedure guide 3.4.7 and 3.4.8
- Plant attribution
- FSC table of owners

**Finding after reviewing evidence:** CPA uses partial cutting to manage plantations. The procedures foresee that companion species be protected to gradually increase their presence and lean towards a more natural forest composition. The procedures implemented by the FME meet the requirement and the NCR can be closed.

**NCR Status:** CLOSED

**Comments (optional):**
### # NCR 21/11 Classification of NC : Major Minor

| Standard & indicator: | Rainforest Alliance Locally adapted Standards for Assessing Forest Management in the Great Lakes/Saint- Lawrence region – August 2010, Indicator 10.3.1 |
| Report section: | Appendix IV, criterion 10.3 |

**NC description and associated evidence:**

CPA no longer conducts plantation work on the territory in the certification process. However, since 1994, plantations as per FSC definition have been found in the CPA territory. CPA does not have a well-documented restoration plan with respect to wildlife requirements. This constitutes a non-conformance with the requirements of Indicator 10.3.1.

**Related Evidence:**
- Interviews conducted and field visits
- Forest and wildlife management plans

**Corrective action request:**
The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

**Timeline for conformance:**
By the next annual audit

**Evidence provided by organisation:**
Procedure guide 3.4.7 and 3.4.8

**Finding after reviewing evidence:**
CPA uses partial cutting to manage plantations. The procedures foresee that companion species be protected to gradually increase their presence and lean towards a more natural forest composition. The procedures implemented by the FME meet the requirement and the NCR can be closed.

**NCR Status:** CLOSED

**Comments (optional):**

### # NCR 22/11 Classification of NC : Major Minor

| Standard & indicator: | Rainforest Alliance Locally adapted Standards for Assessing Forest Management in the Great Lakes/Saint- Lawrence region – August 2010, Indicator 10.7.1 |
| Report section: | Appendix IV, criterion 10.7 |

**NC description and associated evidence:**

CPA no longer conducts plantation work on the territory in the certification process. However, since 1994, plantations as per FSC definition have been found in the CPA territory. CPA does not have a well-documented restoration plan. In addition, CPA has not demonstrated that restoration plans diminish risks of damage to plantations due to wind, fire, rodents and illness. This is a non-conformance with indicator 10.7.1

**Related evidence:**
- Interviews with staff and field visits
- CPA Procedure guide

**Corrective action request:**
The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.

**Timeline for conformance:**
By the next annual audit

**Evidence provided by organisation:**
Procedure guide 3.4.7 and 3.4.8

**Finding after reviewing evidence:**
CPA uses partial cutting to manage plantations. The procedures foresee that companion species be protected to gradually increase their presence and lean towards a more natural forest composition. The procedures implemented by the FME meet the requirement and the NCR can be closed.

**NCR Status:** CLOSED

**Comments (optional):**
Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

<table>
<thead>
<tr>
<th>Timeline for conformance:</th>
<th>By the next annual audit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evidence provided by organisation:</td>
<td>Client list, plantations of less than 5 ha Form F53.7 visual monitoring of plantations</td>
</tr>
<tr>
<td>Finding after reviewing evidence:</td>
<td>CPA uses partial cutting to manage plantations. The procedures foresee that companion species be protected to gradually increase their presence and lean towards a more natural forest composition. This will allow to progressively reduce the risk of damage to plantations caused by wind, fire, rodents and illness. The implemented procedures met the requirement and the NCR can be closed.</td>
</tr>
<tr>
<td>NCR Status:</td>
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<td>Comments (optional):</td>
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### 2.3. New corrective actions issued as a result of this audit

<table>
<thead>
<tr>
<th># NCR</th>
<th>01/12</th>
<th>Classification of NC:</th>
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<th>Minor</th>
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<tr>
<td>Standard &amp; indicator:</td>
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<td>Report section:</td>
<td>Appendix IV, criterion 9.1</td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

**NC description and associated evidence:**

Indicator 9.1.2 requires that the manager submits its HCVF evaluation to a credible external revision. The HCVF evaluation must be made available to the public and include pertinent maps as well as a summary explaining how issues raised during the consultation process were considered. At the moment, CPA demonstrated that HCVFs of all categories were identified on the certified territory. Incidentally, the HCVF evaluation which must be made publically available must be subjected to an external credible revision. This evaluation must address all HCVFs considered by CPA (whether identified by CPA or external sources). During the audit, CPA had yet to submit its HCVF identification to external validation which results in the issuance of minor NCR 01/12.

**Corrective action request:**
The Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.

**Timeline for conformance:**
By the next annual audit

**Evidence provided by organisation:**
PENDING

**Finding after reviewing evidence:**
PENDING

**NCR Status:**
OPEN

**Comments (optional):**
2.4. Audit decision

The table below gives an overview of the NCRs status for 2012 after the current audit.

<table>
<thead>
<tr>
<th>NCR type</th>
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</thead>
<tbody>
<tr>
<td>Open before current audit</td>
<td>22</td>
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<tr>
<td>Closed</td>
<td>22</td>
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<tr>
<td>Upgraded to Major</td>
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</tr>
<tr>
<td>New NCRs</td>
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<tr>
<td>New Major NCRs</td>
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</table>

<table>
<thead>
<tr>
<th>Certification Recommendation</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Certification requirement met: client approved for certificate maintenance:</td>
<td></td>
</tr>
<tr>
<td>Certification requirements not met: major non-conformances identified that need to be addressed during 3 months after the final report date</td>
<td></td>
</tr>
<tr>
<td>Certification Suspension required: major non-conformance not addressed.</td>
<td></td>
</tr>
</tbody>
</table>