Corrective Action Verification Audit (CVA) Report

Organization: Corporation de gestion de la certification forestière des territoires publics du BSL
Cert/Ver/Val Code: SW-FM/COC-005447
Report Date: June 20th 2013

I. AUDIT PROCESS

Auditor, Qualifications: Nicolas Blanchette, F. Eng, MSc, MBA. Forest engineer since 1996, Nicolas specializes in public participation in forest management and forest certification. He acquired a thorough knowledge of FSC certification through his involvement in the organization in New Brunswick, FSC International office in Mexico since 2001 as coordinator of the Initiative Quebec's development standard FSC. Nicolas is responsible for the development of boreal and mixed deciduous-for Quebec standards. He trained auditor with FSC and SmartWood auditor works as chain of custody and forest management in Quebec since 2003.

Tyler Rudolph, biologist, M.Sc. Tyler received a B.Sc. in conservation of natural resources of the Faculty of Forestry at the University of British Columbia in 2001. Having started his career as a forester, forestry technician and foreman, he later became guide and guard for several parks in western Canada (e.g. Algonquin, ON, Whiteshell, MB, Lower Sunshine Coast, BC). As ministerial intern and wildlife technician he worked among others in the identification and planning of a new protected (Woodland Caribou) in the north-western Ontario area. Subsequently, he conducted a study on the characterization of the islands used by woodland caribou during calving as environmentalist. Tyler received his master's degree in animal ecology at the University of Quebec in Montreal in 2011 with honors. He received his certification as an auditor for the Rainforest Alliance in 2012, but he had also participated in the evaluation of other certificates on behalf of other certification bodies.

Audit Date(s): April 25 – May 21st 2013
CVA Type: Desk review ☒ On-site ☐ Location(s):
Audit Overview:
The applicant submitted documentation during the week of April 25, 2013. The CVA due date was in fact May 25th. The auditors started reviewing the evidence in the weeks that followed. The provincial scope of the evidence required more discussions with the applicant, other stakeholders and in between auditors than initially planned. A preliminary report for comments was submitted in the week of May 21, 2013.

The audit conclusions found the applicant to be still in non-conformance with 3 of 6 NRCs. The cert holder requested to be given an extended timeline for conformance for these NCRs (11/12, 12/12 and 13/12). RA has accepted prolonging 2 of the 3 (11/12 and 12/12), recognizing the extraordinary circumstances that were still evolving at the time of the audit. An agreement between MNR and the Forest Industry Council (CIFQ) was signed just a few days before the audit and resulted in the implementation of the new forest regime. The agreement identified the division of responsibilities between the government and the forest companies in regards to the maintainance of forest management certificate ownership. At the time of the audit, it was clear that the MNR was responsible of demonstrating conformance for these two NCRs. The audit therefore took place. However, the operational tables, where certificate holders are expected to participate with regards to taking actions for ensuring conformance were not yet implemented. The applicant was therefore not aware of MNR activities and did not have the opportunity to be involved in demonstrating conformance before the audit took place.

Changes to Scope since last Audit:
None.

II. NON-CONFORMITY REPORT (NCR) EVALUATION

<table>
<thead>
<tr>
<th>CAR 09/11</th>
<th>Reference to Standard: 6.1.3</th>
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<tr>
<td>Non-conformance</td>
<td>The two literatures submitted by the applicant meet several requirements of Indicator 6.1.3. However, they fail to describe the amount of residual structures to be expected after the passage of a wildfire. Moreover, they are not sufficiently precise as to the composition of cover types that are encountered in natural forest.</td>
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The standard also requires that the assessment of natural and historical variability of the forest mosaic is reviewed by qualified specialists and that it is made available to the public. Only one literature review meets these requirements.

Corrective Action Request:
CGCBSL shall demonstrate knowledge of a) the amount of residual structure that can be expected after the passage of a forest fire and b) the distribution or the estimated average composition of tree species, types of structures covered forest or forest units. In addition, the applicant must ensure that the assessment is reviewed by qualified specialists and make it accessible to the public.

Timeline for conformance: Three months after the report is closed

Finding to close the CAR:
a. A description of the main disturbance factors, including intervals of disturbances;

The main natural disturbances in the BSL region are described in the document entitled "Characterization of the variability of the
natural forest in the Lower St. Lawrence." These include the windfall, the spruce budworm outbreaks (estimated 40 years apart), and fire. The natural dynamics of Chablis (range and size of disturbances) in the balsam fir-yellow birch and balsam fir-white birch eastern Gaspé is described in "Effects of disturbance regimes windfall on biodiversity and the implications for recovery" (page 13). The issue of fire cycle is more predominant in the region addressed in the new evidence entitled "Supplement to the portrait of the variability of the natural forest in the Lower St. Lawrence." The applicant has commissioned experts to assess the facts, and like Lorimer (1977) have considered it appropriate to accept an historic fire cycle of 1100 years.

b. Distribution or the estimated average composition of tree species, forest cover types and forest units, as applicable;

The relative abundance of tree species in pre-industrial times is shown in Figure 48 (page 86) of the document "Proposed targets for ecosystem-based management and increased timber production in the Lower St. Lawrence." These results come from the thesis of Sébastien Dupuis (2009) on "the composition of the pre-industrial forests of southwestern Quebec from Surveys Records (1846-1949)." The work of Dupuis was used to estimate the frequency and likely dominance of tree species encountered along the survey between 1846 and 1900 (historical) lines.

The forest cover types encountered in pre-industrial forest are shown in Figure 49 (page 87) of the document "Proposed targets for ecosystem-based management and increased timber production in the Lower St. Lawrence." This result is also due to Dupuis (2009).

The percentages of the three compounds of coniferous, deciduous and mixed forest watersheds in 1930 (the beginning of the industrial era) are from Boucher et al. (2009) and presented in the evidence entitled "Characterization of the variability of the natural forest in the Lower St. Lawrence."

c. The estimated age-class distribution.

Like Boucher et al. (2009), the approximate distribution of age classes of forest stands sampled in 1930 is shown in the proof entitled "Characterization of the variability of the natural forest in the Lower St. Lawrence" (Figure 5, pg. 13).

The assessment is reviewed by qualified specialists and is available for public review.

Evidence entitled "Characterization of the natural variability of Bas-Saint-Laurent" and "Supplement to the portrait of the variability of the natural forest in the Lower St. Lawrence" were reviewed by qualified specialists are available to the public through the following website: http://www.cgcbasl.com/esudmanager_pro/public_area_scripts/docu
As the document "Proposal targets for ecosystem-based management and increased timber production in the Lower St. Lawrence," an initiative of the Regional Elected Commission (CRE), it is not yet available to the general public. Observation 01/13 is issued in this regard.

In summary, the evidence provided by the applicant demonstrate that it has completed the missing information about the characterization of natural and historic forest and the documentation has been reviewed by experts and is accessible to the public. The CAR is closed.

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<th>CAR Status:</th>
<th>CLOSED</th>
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<tr>
<td>Follow-up Actions (If appl.)</td>
<td>OBS 01/13. The document &quot;Proposed targets for ecosystem-based management and increased timber production in the Bas-St-Laurent&quot; is not yet available to the general public. The applicant should ensure that the document is public so that it can be considered as evidence against the indicator.</td>
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**CAR 11/11**

Reference to Standard: 6.3.1

Non-conformance

<table>
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<td>The CRRNT the Bas-Saint-Laurent, supported by a technical committee of various regional stakeholders identified at this time quantitative targets for intensive management and ecosystem management on public lands in the Lower St. Lawrence. These targets do not, however, determine the future state of the desired long-term forest that maintains, improves or restores the natural conditions in natural forests. In addition, these targets do not cover all the requirements of the indicator.</td>
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Corrective Action Request:

CGCBSL shall determine the future of the desired long-term forest that maintains state improves or restores the natural conditions in natural forests.

Timeline for conformance: Three months after the report is closed

Statement to close the CAR:

The Orientation 5 of the Regional Integrated Land Development Plan (PRDIRT) BSL offers objectives of gradually reducing the gap between the natural forest and managed forest. In July 2012, the "Target Committee" for the PRDIRT mandated by the Regional commission (CRRNT) proposed quantitative targets on ecosystem management in the Lower St. Lawrence. Various regional stakeholders, including forest companies, participated in the target identification process. In September 2013, these targets are planned to be voted in the Stakeholder discussion tables (TLGIRT) of the region. If they are approved, they will be integrated into the regional forest management guidelines (sheets VOIC) of the MNR and become part of the Integrated Forest Management Plan (PAFI) of the applicant. If they are not adopted, they will move to public consultations. The five-year plan (2013-2018 PAFI) of the applicant is still under development.

The evaluation of evidence is therefore based on the recommendations of the Committee on targets PRDIRT of BSL and
new evidence submitted by the MNR.

**a. Diversity of forest types**

Relative to forest types generally CGCBSL identified as target to achieve the minimum threshold of 30% of historic proportion of old forest for each forest type (coniferous, mixed, deciduous) across all planning units in the next 60 to 80 years.

Since at present there is no knowledge developed on the size and the average density of different species depending on the type of forest stand to pre-industrial times, CGCBSL emits no goal for this purpose pending the results of future analyzes by researchers at the Research Chair on the inhabited forest at the local University (UQAR).

In relation to forest composition, CGCBSL aims to increase the presence of scarce species (cedar, white pine, red pine, red spruce, white spruce and red oak). However, it makes no specific target for this purpose. Moreover, it does not aim to reduce the presence of species whose abundance has increased called “remarkable” since pre-industrial times (ie maple, poplar and birch; Pg 85 of report Committee on targets PRDIRT).

Although several concrete measures have been proposed by the committee to increase the presence of scarce species CGCBSL has not yet determined the desired future condition of the forest in the long run compared to the relative abundance of tree species and cover types. CGCBSL is not consistent with this element of the indicator.

**b. Diversity of successional stages**

The question of evolutionary stages is in link with findings on age classes and forest structure.

**c. Distribution of age classes, including over-mature forests**

Among the biggest issues identified in the gap analysis submitted by CGCBSL is the depletion of old-growth forests and the abundance of regenerating stands. Consequently, the MRN proposes as long-term goal of reaching the 50% of historic proportion of old forests in 80% UTR of each management unit within 60 to 80 years according to the unit development. This results in a real scale of 40% of historic proportion (74%) of old-growth forests across the certified (ie 29.6% of the total area) within 60 to 80 years old territory. MNR considers this as “an average to medium” degree of alteration in long term. However, with regard to the proportion of old forests, CGCBSL does not demonstrate that their long-term target is to restore the approximate conditions encountered in natural forest. As for areas of regeneration, CGCBSL has no objective in the longer term.
d. Diversity of forest structure (eg. Horizontal, vertical and owner)

The applicant identifies several target elements making significant contributions to forest structure:

irregular / uneven aged stands: Over a period of 60-80 years, CGCBSL is committed to achieving 50% of historic proportion of irregular or uneven-aged stands in each of the management units.

Residual structure: At any time, CGCBSL is committed to maintaining a residual islet of 2000 m² per 5 ha more than 3 to 5 stems per ha scattered (see Indicator 6.3.9). Specifically, the investigation identified three elements: (1) the minimum size of a block (2000 m²), (2) the distribution of islets (1 per 5 ha), (3) the total area of the islands left residual structure (≥ 5% of the total area treated in cutting across the site).

Deadwood: To ensure the retention and recruitment of dead wood, harvested area must consist of at least 20% of variable retention. In addition, at any time, CGCBSL agrees to maintain “adequate amount” of biological legacies (live trees, snags, downed woody debris). Since there is relatively little knowledge about the structure of the old pre-industrial forest CGCBSL is not able to quantify what is meant by “adequate”.

Compared with the spatial organization of old-growth forests, the Committee on targets PRDIRT proposes to maintain or achieve a minimum of 25% of the area of unfragmented forest core areas of more than 1000 ha in the FMU in 20 years. That said, the chunking of old forests is one of the most important environmental issues in the BSL. While most interior forests have less than 5 ha and very little cover over 200 ha area, CGCBSL has no strategy for the medium and long term to “reverse the matrix”, which would be closer to natural conditions according to the principles of ecosystem management. In short, the applicant has not determined the status of the desired forest in the longer term with regard to the spatial organization of interior forests. CGCBSL is not in conformity with that element of the indicator.

e. Connectivity

To evaluate the connectivity, the Committee on targets PRDIRT put on two elements: the area of interior forest and forest area 7m in height and more. It is committed to a) maintain or achieve a minimum of 30% of historic proportion of interior forest in all FMUs at all times b) maintain or achieve a minimum of 50% of the forest area in forests 7m and height in all FMUs at any time, and c) maintain or achieve a minimum of 25% of the area of interior forest massifs of more than 1000 ha in the FMUs in 20 years. In most cases (depending on the management unit), these targets are already
affected by the business methods. That said, CGCBSL neglects the importance of the spatial organization of forests in connectivity across the landscape. For example, interior forests are an essential component of the connectivity analysis can serve as habitats "source" in the context of loss of old growth forests. However, the connectivity analysis submitted is based exclusively on the forest area of more than 7m and therefore not spatially explicit. This approach relies on the degree of openness of the forest mosaic, which is not wrong. However, this connectivity analysis fails to consider a) the potential contribution of habitat corridors, b) edge effects and c) land fragmentation by roads, that can serve as functional barriers to the movement of large numbers of species of flora and fauna. Finally, the connectivity is addressed through the dimensions of connectivity in the management plan for access roads, but they are not included in the analysis of connectivity of the Committee on PRDIRT targets, and the committee's recommendations (eg reduce traffic density) are not included in the management plan of access roads (see indicator 6.3.4). CGCBSL is not in conformity with that element of the indicator.

f. Degree of disturbance to the landscape level (eg. Watershed)

Besides presenting the road densities in the management plan of access roads, there has been no comprehensive analysis of the degree of disturbance to the landscape scale as required indicator, among others to minimize and mitigate the negative impacts caused by roads. Yet in 2006, the Observatory on Forestry BSL concluded that several heads of sub-basins represented a high level of disturbance. In addition, the applicant has no target or short / medium or long-term purpose. CGCBSL is not consistent with this element of the indicator.

Regarding the proposed targets within the new provincial Management strategy (SADF) still in development, it has not been shown how these thresholds are altered based on the historical natural variation in forest conditions, or how they will restore or improve these long-term conditions (note that this differs from the notion of critical threshold associated with the maintenance of biodiversity). Among other things, the planning exercise targets did not take into account the impact of natural disturbances on the elements covered, which leaves no room for maneuver in relation to maintaining the resilience of the ecosystem. Moreover, according to the new scales MRN, 30% corresponds to a degree of impairment "alert", and would be quite inadequate as a long-term target. Finally, it remains unclear whether the fact of exceeding a target in the short / medium term (eg at the level of a management unit) would enable the applicant to downgrade compared to the gap identified. This is not desirable since the purpose of the indicator is to gradually reduce the gap to a state representative of natural conditions.

In all, the evidence is insufficient to conclude that the targets would contribute to restore or improve the existing forest to a state similar to historic proportions, particularly in regards to the diversity of forest
types (ages and cover types composition), the spatial organization (modeling and interior forests), the degree of disturbance across the landscape, and connectivity. The applicant is still not in compliance with this indicator.

| CAR Status: | OPEN |
| Follow-up Actions (If appl.) | As mentioned in the audit overview section, this NCR has been extended for another 3 month period, ending August 25th 2013. |

### CAR 12/11

#### Reference to Standard: 6.3.2

<table>
<thead>
<tr>
<th>Non-conformance</th>
<th>Major X</th>
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<tr>
<td>The CRRNT of the Lower St. Lawrence and a technical committee of various regional stakeholders are working for several months to identify quantitative targets for short to medium term to maintain, enhance or restore natural conditions in natural forests. The interviews reveal that these objectives will be available for the Integrated Forest Management Plan (IFMP) for 2013-2018. These objectives are not yet identified, plans have not yet been developed and no implementation has been completed.</td>
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#### Corrective Action Request:

CGCBSL shall define quantitative targets for short to medium term in order to maintain, enhance or restore natural conditions in natural forests using specialists. Plans should be developed and implemented to achieve these goals.

#### Timeline for conformance:

Three months after the report is closed

#### Statement to close the CAR:

The Orientation 5 of the PRDIRT BSL offers objectives to gradually reduce the gap between the natural forest and managed forest. In July 2012, the Committee on PRDIRT targets mandated by the CRRNT BSL proposed quantitative targets on ecosystem management in the Lower St. Lawrence. Various regional stakeholders, including forest companies, participated in the target identification process. In September 2013, these targets will be a vote in the GIR Table of BSL. If they are approved, they will be integrated into the regional forest management guidelines (sheets VOIC) MRN and become part of the five-year forest management plan (IFMP) of the applicant. If they are not adopted IRM table, they will move to public consultations. The five-year plan (2013-2018 PAFI) of the applicant is still under development.

Therefore, the evaluation of evidence is based on the recommendations of the Committee on PRDIRT targets of BSL and new arguments submitted by the MRN.

Among the quantitative short / medium term targets identified include:

- **a. Diversity of forest types**

There are no quantitative targets identified in the short / medium term view of forest composition. Over a period of 20-40 years, CGCBSL is committed to achieving 30% of historic proportion of irregular or uneven-aged stands in each of the management units.

- **b. Diversity of successional stages**
The question of evolutionary stages is linked with the age class and forest structure findings.

C. Distribution of age classes, including over-mature forests

The Committee on PRDIRT targets of BSL proposes to achieve a minimum threshold of 30% of historic proportion of old forests on 80% of each management unit by 20-40 years depending on the unit planning. This will result in 24% of historic proportion of old growth in each area, well below the warning threshold as identified by MNR. This is inadequate in light of the issues raised in the evaluation of indicator 6.3.1.

In the short term (2013-2018), MNR is to limit the regeneration areas in less than 30% of the territory of the majority (80%) of each management unit.

d. Diversity of forest structure (eg. Horizontal, vertical and owner)

CGCBSL identifies several target elements making significant contributions to forest structure:

Residual structure: At any time, CGCBSL is committed to maintaining a residual patches of 2000 m² per 5 ha more than 3 to 5 stems per ha scattered (see Indicator 6.3.9). Specifically, the investigation identified three elements: (1) the minimum size of a block (2000 m²), (2) the distribution of islets (1 per 5 ha), (3) the total area of the islands left residual structure (≥ 5% of the total area treated in cutting across the site).

Deadwood: To ensure the retention and recruitment of dead wood, harvested area must consist of at least 20% of variable retention. In addition, at any time, CGCBSL agrees to maintain "adequate amount" of biological legacies (live trees, snags, downed woody debris). Since there is relatively little knowledge about the structure of the old pre-industrial forest CGCBSL is not able to quantify what is meant by "adequate".

Compared with the spatial organization of old-growth forests, the Committee on targets PRDIRT proposes to maintain or achieve a minimum of 25% of the area of core unfragmented forest cover of more than 1000 ha in the FMU in 20 years.

Irregular / uneven aged stands: Over a period of 20-40 years, CGCBSL is committed to achieving 30% of historic proportion of irregular or uneven-aged stands in each of the management units.

E. Connectivity

Among the quantitative short / medium term targets proposed by the Committee on targets PRDIRT of BSL, it would achieve a minimum
of 30% of historic proportion of interior forest in all FMUs at all times. There would also achieve a minimum of 25% of the area of core forest cover of more than 1,000 ha in each management unit within 20 years. Finally, it is proposed to maintain or achieve a minimum of 50% of the forest area and forest 7m height in all FMUs. These elements have been addressed in the assessment of indicator 6.3.1.

f. Degree of disturbance to the landscape level (eg. Watershed)

The applicant did not present analysis of the degree of disturbance across the landscape and has no target or short / medium or long-term purpose. Such an analysis would take into account the gap between current and pre-industrial levels of disturbances and consider all types of natural and anthropogenic disturbance.

Many gaps were identified in relation to quantitative short / medium term designed to restore conditions associated with natural forest targets. In addition, given that the SADF is still in the process of public consultation and that proposed by the BSL CRRNT targets have not yet been adopted, they have not been included in the Integrated Forest Management Plan (IFMP) 2013-2018. There was no evidence presented that the annual plan 2012/2013 to help reduce disparities in the certified territory.

The applicant is still not in conformance with this indicator.

**CAR Status:** OPEN

**Follow-up Actions (If appl.)**

As mentioned in Audit overview section, this NCR has been extended for another 3 month period, ending August 25th 2013.

<table>
<thead>
<tr>
<th>CAR 13/11</th>
<th>Reference to Standard: 6.3.4</th>
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<tr>
<td><strong>Non-conformance</strong></td>
<td>The FMUs of Bas-St-Laurent have a very high density of roads and there is no management plan in place access ways to minimize and mitigate the negative impacts caused by these roads.</td>
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**Corrective Action Request:**

The applicant shall produce a complete access roads management plan to minimize and mitigate the negative impacts caused by roads, in accordance with 6.3.4 indicator.

**Timeline for conformance:** Three months after the report is closed

**Statement to close the CAR:**

The management plan covers roads in the 6 FMUs and is based on two components. The first is monitoring the density of the road network in conjunction with the issues of fragmentation of the territory and the second on HCVF areas, areas with cultural, tourist and ecologically sensitive values. For the second part, the auditors felt that the information presented is correct.

Regarding the first part, CGCBSL drew a picture of the density of the existing road network and has established a side-by-block connectivity Integrated Management (BGI). At first glance, the
applicant analyzed a large sample of field paths and a rating of connectivity has been assigned to them according to their degree of re-vegetation. The analysis shows that unused roads eventually close up and are revegetalised. After fifteen years, the analysis highlights a trend where the right of way drops from 7.5 meter to 3 meters and vegetation can reach more than 1 meter and achieves canopy closure or near canopy closure. So CGCBSL does not provide the need to close or reforest ways to minimize their impact on the fragmentation.

To help manage the impacts of roads on landscape fragmentation, the applicant defined the BGI using contour lines to represent sub-basins. They have qualified for the result by calculating the arithmetic mean of scores obtained on the connectivity paths sampled. The aim is not to avoid increasing connectivity per BGI unit, unless the increases are offset by decreases elsewhere.

In other words, the management strategy CGCBSL suggests access routes based on maintaining the current picture in terms of re-vegetation of the road network and the way to achieve this is to let nature take its course. However, the applicant did not describe or explain how the re-vegetation of the observed road network helps to maintain or decrease the fragmentation of forest cover in the area. When does an unused path no longer produces edge effect? When is an unused path no longer considered a linear disturbance with impacts on habitat and wildlife?

CGCBSL have not selected targets in reducing the density of the road network. However, in 2006, BSL Observatory concluded that the density of forest roads in public and private forests in the region was problematic. The strategic road management plan of CGCBSL reported a high density of roads in the certified territory. This density was calculated using the MRN path assignments according to categories of rideability. The observed results are highly variable ranging from 0.25 to 3.9 km/km2. Considering also the fact that the area is highly fragmented (large number of small areas of mature forest cover spread over the territory) and intrinsically, the harvest is planned such that it is spread over the whole territory, the auditors are questioning CGCBSL on the premise that the fragmentation of forest cover is at an acceptable level. The connectivity analysis is submitted based solely on the forest area of more than 7m without considering their spatial distribution. According to the evidence presented, the auditors concluded that the fragmentation of the territory is not at an acceptable level. Thus, the strategy of letting nature take its course is not sufficient to demonstrate that the strategic management of access roads contributes to minimize and mitigate the negative impacts caused by roads as required by the indicator.

In addition to the factors discussed above, the following are also identified;
- The evidence presented does not explain how the access roads management plan contributes to the achievement of the targets of the desired future forest short, medium and long-term condition.

- The impact of the use of other users on the revegetation of roads has not been evaluated.

- The auditors believe that assigning a value calculated connectivity using an arithmetic mean does not allow the consideration of the impact of the more recent tracks (thus less closed) on fragmentation. In addition, the method does not explain how the new paths will be included in calculating values per BGI.

- The management plan addresses only the issue of fragmentation related to HCVF. But there are other impacts caused by roads. No justification is provided on why other impacts (e.g., predation, habitat loss, and degradation of the aquatic environment) are not required to be considered. For example, although the strategy of the applicant is based on the fact of “letting nature do all the work” the road management plan does not refer to the need to manage the quality of infrastructure in the time set aside to complete the obligation with respect to SOPs during the construction of new infrastructure. However, it is recognized and studies show that the majority of neglected infrastructure deteriorates significantly in time, causing erosion and sediments into streams.

CAR Status: OPEN

Follow-up Actions (If appl.)

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<th>CAR 14/11</th>
<th>Reference to Standard: 6.3.9</th>
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<td>Non-conformance</td>
<td>There are no specific targets for various structural components</td>
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<td>determined and documented by considering the vertical and horizontal diversity of trees, wildlife habitat and woody debris. These objectives for the various structural components should be based on that let natural disturbances.</td>
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<td>However, retention targets have not been established, the existing retention has not been documented in clearcuts, apart from maintaining some rarer species such as pine and cedar, retention across the cutting area is low or non-existent at times.</td>
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<td>Also, in order not to let the merchant timber, snags are felled to see if volumes dry and sound wood can be used. This is despite the PDO for the maintenance of standing snags.</td>
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<td>The auditors note that among other mosaics cuts made by CGCBSL do not meet the goal of indicator 6.3.9. Particular element f) that says &quot;In the small harvest (ie d. 5-20 ha) where there is plenty of residual structure as separators harvest blocks, peninsulas, areas riparian buffer, reserved for other purposes or stands nearby areas harvested as a partial section of a residual structure from 25 to 30 trees per hectare should be maintained within the total section on the objectives of the forest manager in terms wildlife habitat and ecological characteristics.</td>
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<td>The CGCBSL has not demonstrated that its practices were in accordance with 6.3.9 indicator. It will therefore change its practices and demonstrate that the (partial total, mosaics, etc.). Residual structures in all sections keep in practice on the ground residual structures required by the 6.3 criterion.</td>
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**Corrective Action Request:**
The applicant shall demonstrate that residual structures are sufficient in terms of quantity and distribution of the cutover so that they can fulfill their ecological functions in partial cuts and clearcuts, including mosaics cuts.

**Timeline for conformance:** Three months after the report is closed
**Statement to close the RAC:**

Based on the data collected, the range of returns of fire to the territory of the CGCBSL is 1100 years, that estimated by Lorimer (1977). And 0.09% of the land would be affected by fire annually.

As for the residual to be expected a wildfire, Kneeshaw *et al.* (2008) suggest provisional estimates to be adopted for the Public Forest BSL of islands approximately 5% of the area of each harvest. The instruction specifies three elements: (1) the minimum size of a block (2000 m²), (2) the distribution of islandss (1 per 5 ha), (3) the total area of the islands left in structure residual (≥ 5% of the total area treated by cutting across the site). The method specifies that retention elements are added to the operational guidelines of the silvicultural prescription intervention sectors auctioned and also the sectors assigned as backups. In this regard, an annex was added to the harvesting agreements signed between the MRN and the timber supply guarantee beneficiaries.

This retention is permanent. It will not be collected until the next rotation. In mosaic cuts, the 5% retention described above is in addition to cutting separators where there may be harvesting once the adjacent forest has reached 3 m in height. MRN is investigating the possibility of leaving residual structures in the separators of cut.

If the wood is sold on the open market, an audit will be conducted to ensure that silvicultural prescriptions and operational guidelines have been met. There are penalties in case of non-conformance thereof.

The method states that the majority of retention patches must contain snags. According to Déry and Leblanc (2005), snags are dead trees over 10 cm diameter at breast height (DBH). Wildlife value trees must also be present. They are large diameter trees, alive or dead with the following essential characteristics: cavities, crowns well developed stems above the canopy, etc.

Thus, the applicant has demonstrated that residual structures are sufficient in terms of quantity and distribution throughout the cutover and this enable them to perform their ecological functions in partial cuts and clearcuts, including mosaics cuts. The CAR is closed.

**CAR Status:** CLOSED

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<th>CAR 24/11</th>
<th>Reference to Standard: 7.1.1</th>
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<tbody>
<tr>
<td>Non-conformance</td>
<td>The plans contain several elements required by the indicator but some are confused, this plan remains incomplete.</td>
</tr>
</tbody>
</table>

**Corrective Action Request:**
The applicant shall complete the development plan in order to include all the elements listed in Annex D.

**Timeline for conformance:**
Three months after the report is closed

**Finding to close the CAR:**
The findings of the audit in 2012 reported that a management plan for access roads was not available for all UAF targeted certification. CGCBSL presented a management plan for access roads for all
III. CONCLUSIONS

NCRs Closed:  
☐ No follow-up required related to closed NCRs  
☐ Original NCRs closed and new NCR(s) issued, see section IV below

NCRs Open:  
☒ Certification/Verification/Validation not approved; conformance with NCRs required  
☐ Major NCRs not closed; suspension of certification/verification required  
☐ Minor NCRs are upgraded to Major; see section IV below  
☐ New NCR(s) issued, see section IV below

Comments/Follow-up Actions:

IV. OPEN NCRs

Newly issued or upgraded NCRs:

<table>
<thead>
<tr>
<th>CAR 11/11</th>
<th>Reference to Standard: 6.3.1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-conformance</td>
<td>The CRRNT the Bas-Saint-Laurent, supported by a technical committee of various regional stakeholders identified at this time quantitative targets for intensive management and ecosystem management on public lands in the Lower St. Lawrence. These targets do not, however, determine the future state of the desired long-term forest that maintains, improves or restores the natural conditions in natural forests. In addition, these targets do not cover all the requirements of the indicator.</td>
</tr>
<tr>
<td>Major X Minor</td>
<td>Corrective Action Request: CGCBSL shall determine the future of the desired long-term forest that maintains state improves or restores the natural conditions in natural forests.</td>
</tr>
</tbody>
</table>

2012 findings:  
The indicator clearly requires maintenance, improvement or restoration of natural conditions in the long term. However, the presented evidence was not sufficient to conclude that the targets retained by the FME contribute to restore the actual forest to a state similar to historic proportions notably in proportions, areas, composition and structure.

2013 findings:  
After analysis of the new evidence provided, the targets were found to be still insufficient to conclude that they would contribute to restore or improve the existing forest to a state similar to historic proportions, particularly in regards to the diversity of forest types (ages and cover types composition), the spatial organization (modeling and interior forests), the degree of disturbance across the landscape,
and connectivity. The applicant is still not in compliance with this indicator.

<table>
<thead>
<tr>
<th>Timeline for conformance:</th>
<th>Six months following 2012 report closure (August 25th 2013)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Statement to close the CAR:</td>
<td>PENDING</td>
</tr>
<tr>
<td>CAR Status:</td>
<td>OPEN</td>
</tr>
</tbody>
</table>
| Follow-up Actions (If appl.) | |}

**CAR 12/11**

<table>
<thead>
<tr>
<th>Non-conformance</th>
<th>Reference to Standard: 6.3.2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major X</td>
<td>Minor</td>
</tr>
<tr>
<td>The CRRNT of the Lower St. Lawrence and a technical committee of various regional stakeholders are working for several months to identify quantitative targets for short to medium term to maintain, enhance or restore natural conditions in natural forests. The interviews reveal that these objectives will be available for the Integrated Forest Management Plan (IFMP) for 2013-2018. These objectives are not yet identified, plans have not yet been developed and no implementation has been completed.</td>
<td></td>
</tr>
</tbody>
</table>

**Corrective Action Request:**

CGCBSL shall define quantitative targets for short to medium term in order to maintain, enhance or restore natural conditions in natural forests using specialists. Plans should be developed and implemented to achieve these goals.

<table>
<thead>
<tr>
<th>2012 findings:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Mid (20-40 years) and long (60-80) term objectives have be established. Means to achieve those objectives have been proposed. However, the applicant was unable to clearly demonstrate the plan’s application. The indicator requires that plans aiming to restore natural conditions be implemented. The applicant remains in non-conformance, the CAR is upgraded to major.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2013 findings:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Many gaps were identified in relation to quantitative short / medium term designed to restore conditions associated with natural forest targets. In addition, given that the SADF is still in the process of public consultation and that proposed by the BSL CRRNT targets have not yet been adopted, they have not been included in the Integrated Forest Management Plan (IFMP) 2013-2018. There was no evidence presented that the annual plan 2012/2013 includes measures to contribute reducing these disparities in the certified territory.</td>
<td></td>
</tr>
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</table>
| Follow-up Actions (If appl.) | |}

**CAR 13/11**

<table>
<thead>
<tr>
<th>Non-conformance</th>
<th>Reference to Standard: 6.3.4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major X</td>
<td>Minor</td>
</tr>
<tr>
<td>The FMUs of Bas-St-Laurent have a very high density of roads and there is no management plan in place access ways to minimize and mitigate the negative impacts caused by these roads.</td>
<td></td>
</tr>
</tbody>
</table>

**Corrective Action Request:**
The applicant shall produce a complete access roads management plan to minimize and mitigate the negative impacts caused by roads, in accordance with 6.3.4 indicator.

2012 findings:
The plan presented was found to cover only 1 of 6 FMUs included in the certified territory. Also, the plan, as presented, did not specify which measures were planned to be taken to minimize impacts caused by roads. Therefore, the CAR remained open and was upgraded to Major.

2013 findings:
The documents presented were found to cover all the FMUs included in the scope of the certificate. However, the plans do not cover all impacts caused by roads, and no justification is provided on why other impacts (eg predation, habitat loss and degradation of the aquatic environment) have not been considered. In addition, fragmentation is known to be an issue in the region. Auditors found that the plans only address this issue in regards to HCVs. The plan does not identify any objectives or measures to help reduce road density network. The applicant is still in non-conformance with this indicator.

<table>
<thead>
<tr>
<th>Timeline for conformance:</th>
<th>No date specified as the certificate is currently suspended. The certificate cannot be re-issued until this CAR is closed.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Statement to close the CAR:</td>
<td>PENDING</td>
</tr>
<tr>
<td>CAR Status:</td>
<td>PENDING</td>
</tr>
<tr>
<td>Follow-up Actions (If appl.)</td>
<td></td>
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</table>

V. AUDIT REPORT APPROVAL

Note: a formal Q-09 Report Review and Approval (RRA) Checklist conducted by an independent, authorized reviewer is required when the CVA results in certificate/verification/validation issuance or suspension/termination, or when there is a change in scope. In all other cases, the report may be approved with the 2nd checkbox below by an authorized RRA reviewer which may be the CVA auditor, or by a Senior Auditor.

☐ Refer to separate Q-09 RRA Checklist
☒ Report approved by way of this checkbox

Approved by: Krista West, Mylène Raimbault (in training)
Date: June 20th, 2013
☒ Salesforce has been completed with applicable files uploaded, and is updated based on any changes to the Organization details or other areas relevant to the CVA.