

# FSC CERTIFICATION SYSTEM

## TRANSFER AUDIT REPORT

### FOREST MANAGEMENT CERTIFICATION

Report finalisation date: December 3, 2014

## Spray Lake Sawmills

Forest location(s): Alberta Canada

Manager office address: 305 Griffin Road

Postal code: T4C 2C4 - Town: Cochrane, Alberta - Country: Canada

Contact Person: Jason Mogilefsky (jason.mogilefsky@spraylakesawmills.com)

## BUREAU VERITAS CERTIFICATION

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Initial audit date: October 27-31, 2014

Certificate registration code: BV-FM/COC-104091

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Lead auditor and report writer: Brian Callaghan

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## 1 - Description of the applicant forest entity

### 1.1 - General description and identification

**Forest Management company / manager(s) name:** SPRAY LAKE SAWMILLS Ltd.

Address: 305 Griffin Road

Postal code: T4C 2C4 -

Town: Cochrane, Alberta

Country: Canada

Legal status: Limited Corporation

Telephone: 405.851.3338

e-mail: [jason.mogilefsky@spraylakesawmills.com](mailto:jason.mogilefsky@spraylakesawmills.com)

Web site: [www.spraylakesawmills.com](http://www.spraylakesawmills.com)

Employees number: 185

Annual turnover: 000 000 000 € / US\$

President of the Forest Management company: Mr. Barry Mjolsness

Manager of the Forest Management company: Mr. Ed Kulcsar

Contact person (responsible for FSC certification): Mr. Jason Mogilefsky

#### Activity

Type: the scope of this certificate is forest management and logging.

Detailed activity: complete description

Spray Lakes Sawmills is a softwood sawmill in Cochrane Alberta which was established in 1943. The Company obtains its timber from the Forest Management Area they hold with the Alberta Government and from a Quota area they have license to. The scope of the certificate covers forest management on 337,447 hectares of Crown forest lands in the foothills of southern Alberta.

The Company is privately owned by the Company president, he is supported by a general manager and six managers covering Woodlands, Operations, Environment Health, Chief Financial Officer, Top Spray, and Sales.

This forest is on Crown (public) lands in Alberta where the Province of Alberta has given the forest management responsibilities to Spray Lake Sawmills. The area is very close to the city of Calgary and is the focus for a wide range of recreational uses, cattle grazing, and tourism.

### 1.2 - Forest population(s) description

Spray Lakes Sawmills manages more than 330,000 hectares of forest lands in the foothills of southern Alberta. The forest is bounded on the west by Banff National Park and in the south west by Kananaskis country.

#### Forest(s) description

Forest zone: **boreal – subalpine**

List of main commercial timber and non-timber species included in the intended scope of certificate (botanical name and common trade name):

Picea engelmannii - Engelmann spruce  
Picea glauca - white spruce  
Abies Lasiocarpa - subalpine fir  
Pinus contorta - lodgepole pine  
Populus tremuloides - trembling aspen  
Populus balsamifera - balsam poplar  
Betula papyrifera - white birch

Dominating forest stand composition: softwood

Location of the forest:

- Latitude 114059'55" W to 114035'43" W
- Longitude 510 52' 27" N to 500 9' 31" N

Total audited forest area: **337,447 ha**, of which is:

- privately managed: 337,447 ha
- state managed: 0 ha
- community managed: 0 ha
- timber production forest: **223,152 ha**
  - classified as "**plantation**": 0 ha
  - regenerated primarily by **replanting** or by a combination of replanting and coppicing of the planted stems: 133,891 ha
  - regenerated primarily by **natural regeneration**, or by a combination of natural regeneration and coppicing of the naturally regenerated stems: 89,261 ha
- forest and non-forest land protected from commercial harvesting of timber and managed primarily for
  - inoperable: 114,295 ha
  - conservation objectives: 0 ha
  - the production of NTFPs or services: 0 ha
- forest classified as "high conservation value forest": 330,000 ha

List of high conservation values present: The HCV assessment for the Spray Lake FMA is exhaustive and covers a variety of scales. For example the entire forest is an HCV for Grizzly Bear as part of the conservation and recovery strategy for the species, others are very localized such as remnant forest which is less than 5000 ha. Others are transitory point values such as a nesting site for the Barred Owl. What follows is the list of HCVs identified.

HCV1: **Species at Risk:** Grizzly Bear and Bull Trout

**Provincial Listed Species:** Northern Goshawk, Black-backed Woodpecker, Brown Creeper, Sandhill Crane, Pileated Woodpecker, Canada Lynx, Barred Owl, Great Gray Owl, Long-toed Salamander, Columbia Spotted Frog

**Rare Plants:** Anastrophyllum michauxii, Homalothecium nevadense, Bacidia hegetschweileri, Buellia turgescens, Chaenotheca stemonea, Silene involucrate, Ephebe lanata, Aster maccallae, Stellaria umbellate, Arnica amplexicaulis, Aster eatonii, Ribes

laxiflorum Splachnum vasculosum, Anaptychia setifera, Chaenotheca chrysocephala, Calicium trabinellum, Chaenotheca trichialis, Cladonia bacilliformis, Cyphelium inquinans, Leptogium tenuissimum, Mycocalicium subtile, Whitebark Pine (Pinus albicaulis), Limber Pine (Pinus flexilis), Black Spruce (Picea mariana), Tamarack (Larix laricina), White Birch (Betula papyrifera), Interior Douglas Fir (Pseudotsuga menziesii var. glauca)

HCV3: **Rare plant communities:** Lodgepole pine/red-osier dogwood woodland, Lodgepole pine/white meadowsweet forest, Aspen-subalpine fir-Engelmann spruce/clasping-leaved twisted stalk forest, Douglas fir/angelica spp. Forest, Whitebark pine-Engelmann Spruce / white mountain avens, Limber pine scree woodland

**Unique and Diverse habitats:** Mixedwood forest in riparian settings, Shallow marshes and beaver pond complexes, Deciduous mixedwood and pure deciduous cover types >110 years old, Late seral and old growth conifer > 170 years old, Upland Grasslands

**Large Landscape Level Forest:** Block 1 & Block 2

**Remnant Landscape Level Forest:** Remnant #8, Remnant #12

HCV4: **Critical Impact on Fisheries:** Important stream reaches identified as pure westslope cutthroat trout population sites and known bull trout spawning sites.

**Significant Concentrations of Biodiversity Values:** The Highwood River watershed portion of the FMA designated as a Nationally Significant ESA, The Red Deer River watershed portion of the FMA designated as a Nationally Significant ESA, The Elbow River main stem and its adjacent alluvial aquifer (also included in HCV1)

HCV6: Known and identified site-specific unique and historical resource values, recorded with Alberta Culture and Community Spirit (ACCS), are considered HCVs. Site specific values brought forward by First Nations will also be considered HCVs

List of chemical pesticides used within the forest area, and reason for use:  
None.

**Partial certification or exclusion of area from the scope of the certificate**

The entire FMA is certified.

**1.3 - Certification application type**

Type of certificate: Multiple FMU

Total number of FMUs in the certificate scope: 02

Number of FMUs and forest area in scope that are:

less than 100 ha: 0 FMU that is 000 ha;

from 100 to 1000 ha: 0 FMU that is 000 ha;

from 1000 to 10 000 ha: 0 FMU that is 000 ha;

more than 10 000 ha in area: 2 FMUs that is 337,447 ha.

meeting the eligibility criteria as SLIMF: 0 FMU that is 000 ha.

## 1.4 - Forest management system and plan description

Forestry principles: The Spray Lake FMA is predominantly even-aged forests of Lodgepole Pine which are over 80 years of age. Even-aged management is used to manage the forest on rotation ages of 100 years using variable retention harvesting and clear cutting with reserves, followed by planting. Where feasible natural renewal is employed.

### Summary of the management plan:

Spray Lake Sawmills is operating under a 2006 Detailed Forest Management Plan which has been approved by the Government of Alberta. The plan has three goals:

1. To maintain natural ecosystems, communities and native species in the FMA area in balance with social and economic needs.
2. To build knowledge of ecological relationships.
3. To manage broad ecosystem functions and patterns in order to maintain broad species diversity based on a natural disturbance history dominated by fire.

These goals are supported by a series of specific objectives for which management strategies have been developed. They include:

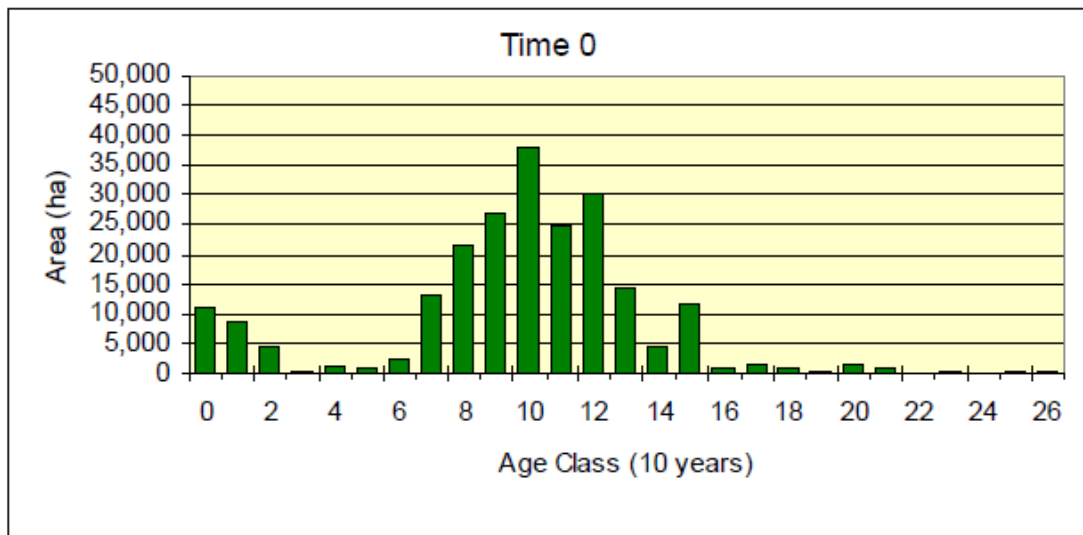
- Minimize the impact of access development on the environment and other land uses.
- Incorporate adaptive management philosophy into the management strategy for the DFMP.
- Continue to support research as a commitment to adaptive management and environmental protection.
- Provide a continuous supply of timber to the mill site.
- Manage the forest land base within the FMA and the B9 Quota area on a sustained yield basis, based on a balance of ecological, economic and social values.
- Mitigate the impact of our operations on visual resources.
- Maintain the natural vegetation range of variability across the landscape at key points in time.
- Protect rare ecosystems and ecosites.
- Retain structural attributes within harvested areas and fire salvage areas.
- Retain tree species genetic diversity across the landscape.
- Develop a landscape level understanding of wildlife habitat needs both spatially and temporally.
- Maintain habitat for key species over time at the landscape level.
- Incorporate wildlife habitat needs in operational planning.
- Minimize the impacts of SLS activities on riparian areas.
- Evaluate riparian management opportunities.

- Recognize and honor the fixed volume commitments contained in the FMA.
- Minimize the impact of our activities on soil productivity.
- Minimize soil erosion from our operations.
- Minimize the loss of productive forest land base.
- Continue to provide for public involvement in the development of company plans.
- Meet our obligations in reforesting all harvested areas.
- Identify areas where alternate reforestation strategies may be necessary and where alternate reforestation standards need to be developed.

The forests of the Spray Lake forest management area are 63% lodgepole pine, 18% Englemann Spruce, 8% Hardwood (primarily Aspen) and 7% mixedwood. Stands are primarily even-aged in nature and are fire origin stands.

Type	Share
Pine	63%
Spruce	18%
Mixedwoods	7%
Hardwoods	8%
Other	4%
	100%

Figure 1 shows the age structure of the forest in 2006. The majority of the forest is beyond 80 years in age with a deficit in early successional (younger) forests.



**Figure 1. Spray Lake FMA Age Class Structure**

Spray Lake Sawmills is the manager of the FMA and they undertake all of the management and operational planning. They prepare all of the silvicultural prescriptions and access developments. The company monitors all activities on the forest. Contractors are used to undertake harvesting activities, road

building, and silvicultural activities. All staff and contractors participate in both formal and informal training sessions. Monitoring results are available to the public in the Company's sustainability Report.

Implementation and objectives of the system: The Detailed Forest Management Plan is implemented through an annual planning process and detailed Forest Harvest Plans. Company foresters monitor operations regularly (at least weekly) to ensure that operations are carried out in accordance with the plan and the laws of Alberta.

### 1.5 - Production and harvesting

Within the development of the Detailed Forest Management Plan allowable harvest levels were set through a modelling process which modelled individual forest strata and allocated harvest amongst eligible stands. Using the Alberta Vegetation Inventory a variety of scenarios were modelled. This assessment took into account inoperable areas, and recreation areas.

Softwood harvest levels are currently 70% of the available volume, while the hardwood harvest is non-existent as there are no industries in the area to consume the hardwoods.

Species	Product nature	Produced quantity	Selling mode	FSC type
Lodgepole Pine	Logs W1.1 ...	222,000 m <sup>3</sup>	FOB...	FSC 100%

Approximate annual biologic softwood production: 318,000 m<sup>3</sup>/year

Approximate softwood harvesting volume (AAC): 222,000 m<sup>3</sup>

Approximate annual harvesting rate (AAC / total available volume): 70%

Approximate annual biologic hardwood production: 53,000 m<sup>3</sup>/year

Approximate hardwood harvesting volume (AAC): 0 m<sup>3</sup>

Approximate annual harvesting rate (AAC / total available volume): 0%

Approximate annual commercial production of non-timber forest products included in the audit scope, by product type: 0 unit



## A. Transfer Audit

### 2 - Transfer Information

#### 2.1 - Previous Scope of the certificate

##### 2.1.1 - Geographical limitation at the level of the entity

The Spray Lake Sawmills FMA, Alberta FMA 0100038

##### 2.1.2 - Limitation at the level of the forest products

Round wood timber of Lodgepole Pine, Englemann Spruce and Aspen.

#### 2.2 - Certificate general information

##### 2.2.1 - Previous certificate number

RA-FM/COC-006648

##### 2.2.2 - Certificate Validity

First issue date: October 25, 2013

Expiry date: October 24, 2018

##### 2.2.3 - Last audit

Type of audit: Complementary audit

Dates: August 6-10, 2013

Purpose: To close major non-conformances from initial audit.

#### 2.3 - Forest management referential used for the previous audit

The Canadian National Boreal Standard (August 6, 2004) was used in previous and current audits. This latest version is available on the website [www.ca.fsc.org](http://www.ca.fsc.org)

### 3 - Conclusion of previous audit

Spray Lake Sawmills underwent an initial audit September 11-13 2011, with the report being finalized May 28, 2012. This report included 4 major non-conformances and 59 minor non-conformances. At the closing meeting of the initial audit the auditors only identified the major non-conformances. A Complimentary audit was undertaken August 6-10, 2013 to close the major non-conformances. Three of the four major non-conformances were closed and one was down-graded to a minor. Certification to the National Boreal Standard was granted October 25, 2013

### 3.1 - Transfer process

The certificate transfer process was undertaken in two stages. Due to the extremely large number of minor non-conformances and initial document review was undertaken July 15-18, 2014. Due to the nature of several of the minor non-conformance stakeholder consultations were necessary. A formal Transfer at Surveillance audit was undertaken October 27-31, 2014. This audit included a “normal” surveillance audit with enhanced stakeholder consultations.

### 3.2 - Previous audit conclusions

#### 3.2.1 - Pending major Corrective Action(s) Request(s)

Four major Non-conformances were issued during the initial audit in 2012, three were subsequently closed during a complimentary audit in 2013. One major non-conformance was downgraded to a minor non-conformance.

Major CAR N°	Non-Conformance	Standard requirement reference	Closure deadline required
01/12	SLS does not consistently provide meaningful opportunities for public participation.	National Boreal Standard indicators 4.4.1 and 4.4.2	OPEN but downgraded to Minor NCR 01/12.
02/12	SLS has not established benchmarks of current forest conditions at a landscape level.	National Boreal Standard indicator 6.1.7	CLOSED Oct. 24, 2013
03/12	SLS has not demonstrated that forest units and communities that are significantly under represented are being increased in abundance over the longer term.	National Boreal Standard indicator 6.3.4	CLOSED Oct. 24, 2013
04/12	SLS has not completed a peer-reviewed scientific gap analysis and has not used the gap analysis and other HCVF attributes to locate additional protected areas.	National Boreal Standard indicator 6.4.1	CLOSED Oct. 24, 2013

#### 3.2.2 - Pending minor Corrective Actions Requests

Sixty minor non-conformances had to be reviewed during the transfer process. This is an extremely high number of non-conformances for a Canadian forest and was suspected to be the result of a complete system failure on the part of the Company. Upon review this was found not to be the case. A significant number of the non-conformances were found to be “UNFOUNDED”, meaning that they were not consistent with the standard or the facts. For example, the company received four non-conformances related to chemical even though they do not use chemicals in their management regime. The table in appendix A lists all the minor non-conformances as well as our findings on each.

The table in appendix A sums up the NC closure justification and date.

### 3.2.3 - Previous audit recommendations

None.

## 4 - Scope retained for the certification

### 4.1 - Eventual changes in the scope of certification

None

### 4.2 - Geographical limitation at the level of the entity

The Spray Lake Sawmills FMA, Alberta FMA 0100038.

### 4.3 - Limitation at the level of the forest products

Round wood timber of Lodgepole Pine, Englemann Spruce and Aspen

## 5 - Transfer evaluation

### 5.1 - Evaluation of the general conformity level of the entity

Spray Lake Sawmills have diligently addressed the minor non-conformances issued during the initial audit by Rainforest Alliance. The Company has a robust planning, implementation, and monitoring program which implements a superior forest management program. The Company operates in a challenging environment being located close to the city of Calgary with high public visibility and with some very active and often intransigent stakeholder groups.

### 5.2 - Clear description of all recommendations and conditions associated to the certification decision

None Issued

### 5.3 - Minor Corrective Action Requests

None Issued

### 5.4 - Major Corrective Action Requests

None Issued

**5.5 - Proposal of conclusion on whether the candidate entity achieved or not the required level of conformance**

Having addressed all the outstanding non-conformances the transfer of the FSC forest management certificate of Spray Lake Sawmills should proceed.

**6 - Certification decision**

Regarding lead auditor and technical review conclusions, the HUB decides that the FSC FM certificate of Spray Lake Sawmills remains valid.

**Issued the December 3, 2014, reviewed the 05/03/2015**

**FSC FM Technical reviewer,**

**Lead Auditor,**

**Florian Terrière**



**Brian Callaghan**

**Appendix A - Minor NCs**

#	Criteria Indicator	Non-Conformance	Comments/Response	Closed?
1		<p>SLS does not consistently provide meaningful opportunities for public participation. However, SLS still does not consistently provide the following elements in its public participation processes, which limits the meaningful opportunities for public participation for some individuals:</p> <p>1) Adequate notification of public participation opportunities.</p> <p>2) Easily accessible and understandable maps.</p> <p>3) Direction to staff regarding public participation during expedited forest harvest planning.</p>	<p>Provided documentation of workshops, open houses and collaborative planning sessions; copies of improved maps; updated WOM section. Reference: W:\FSC Certification\2014 Surveillance Audit\Minor 1 (Public communication). The company website has been updated with excessive information and fully advertise opportunities. Use of a large stakeholder list which is maintained for all public consultations. 1) Public notification is done in newspapers and through direct email notification - at least two weeks prior to the event. 2) Maps clearly showing values and land use are readily available. 3) A public participation policy is in place. There is a small cabal of stakeholders who feel that consultation means capitulation. During the audit all these groups were interviewed along with a wider and broader range of stakeholders who disagreed with this finding - as did the audit team.</p>	<p>Yes July 18, 2014 July 18, 2014</p>
5	1.3.1	<p>The assessment team heard concerns by an interested person that SLS's summer operations contravene the Migratory Bird Act. SLS has not adequately demonstrated that their summer operations are in compliance with the Migratory Bird Act.</p>	<p>SLS does not operate (harvest) during the breeding season of May and June hence there is no impact on migratory birds. Operations outside the breeding season do not contravene the act. Additionally all machine operators know the requirements when nests are found (shut down and call).</p>	<p>Yes July 18, 2014 July 18, 2014</p>

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6	2.1.1/2.2.1	<p>the assessment team finds that SLS has not done all it could to work with OHV groups and ASRD to prevent and mitigate the negative impacts of this use on the landscape.</p>	<p>SLS is doing all that can be done, as all new roads are being 100% reclaimed. SLS can demonstrate through field tours that reclaimed roads cannot practicably be used by illegal ATV use. SLS meets with members of the OHV community while participating on the Ghost Stewardship Monitoring group to share its management plans and discuss OHV trail management concerns. SLS also has one OHV representative on its Public Advisory Council in part to share management plans and discuss the importance of following access management plans, minimizing the size, intensity and duration of linear disturbances to ecosystem functions and brainstorming for ideas to better manage OHV use on the FMA. SLS confirms that they continue to report instances of illegal activity to the AESRD when encountered by SLS employees</p>	<p>Yes July 18, 2014          July 18, 2014</p>
7	2.2.1	<p>SLS has not verified whether the community water tenure holders in the Bragg Creek area should be identified and documented as tenure holders for the area they seek to certify.</p>	<p>SLS is not aware of any water tenure holders on the FMA or any water tenure license holders downstream of the FMA that are directly affected by its operations. The government of Alberta has advised SLS of all disposition and tenure holders on the FMA. The AESRD provides SLS with a real time database called GLIMPSE containing all of the recognized disposition and tenure holders on the FMA that SLS checks on a routine basis. SLS conducts annual open houses and has a comprehensive contact list to inform stakeholders and the public of its operations and has not heard from any water license tenure holders either on or off the FMA. The following excerpt from the May 28, 2012 Rain Forest Alliance Forest Management Certification Assessment report NCR 7/12 states: <i>SLS told the team that there are no water use tenures within the defined forest area. This was confirmed with ASRD. Residents of the Bragg Creek area informed the team of three community water providers in the Bragg Creek area, within 10 to 20 kilometers of the defined forest area, who have tenures to draw water from the Elbow River which originates in the defined forest area. It was not possible to verify whether these water users are tenure holders</i></p>	<p>Yes July 18, 2014          July 18, 2014</p> <p>UNFOUNDED</p>

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			<i>under this standard. In light of the importance of water management in this area, NCR 07/12 is written. Based on this excerpt from the report above by the Rain Forest Alliance BVC finds this NCR is unfounded.</i>	
8	2.3.1	SLS does not have a process in place for fairly resolving disputes with tenure holders other than grazing and trapping. The current approach of relying on ASRD to resolve disputes is not satisfactory to interested parties.	SLS's dispute resolution policy is available on its website at the following link: <a href="http://www.spraylakesawmills.com/woodlands/public-involvement-process/">http://www.spraylakesawmills.com/woodlands/public-involvement-process/</a> SLS also has a dispute resolution policy for First Nations outlined in its First Nations MOU found in: W:\FSC Certification\2014 Surveillance Audit\Minors 8_12 (Dispute resolution)\Dispute resolution Most conflicts found by the audit team were over land use and enforcement which are beyond the scope of this certification.	Yes July 18, 2014 July 18, 2014
9	3.1.1	Prior to the start of the assessment, SLS was not aware of the need to determine the interests of the Métis. SLS received its direction of which groups to consult with from ASRD. While ASRD does not require consultation with the Métis, the definition of Indigenous peoples in Canada (as per the Canadian Charter of Rights and Freedoms in the Constitution Act 1982) includes Métis. As per the requirements of this indicator, SLS needs to establish a good working knowledge of the Métis, and determine if they have any interests related to the FMU.	SLS has been in contact with the Metis Nation of Alberta on numerous occasions since 2012 as per the communications log. They have reviewed the HCVF report and other issues. Continued contact is on-going. During the surveillance/transfer 5 attempts were made to contact the Metis Nation and no response was received.	Yes July 18, 2014 July 18, 2014

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10	4.4.4	<p>SLS has not openly sought representation on the PAC and the active membership does not reflect a broad and balanced range of interested parties.</p>	<p>Rainforest Alliance 2013 PVA Findings: <i>Public Advisory Committee (PAC) – There have been several changes to the PAC processes: a) membership has been expanded through an openly advertised process, with a broadened range of perspectives represented ; b) a list of individuals interested in becoming members is maintained ; c) the terms of reference has been revised and approved by the PAC ; and d) the minutes of PAC meetings are posted more promptly and they indicate the PAC is more actively providing input on SLS forest management activities. The PAC has provided input on FSC certification, Protected Areas Gap Analysis, HCVF report, Stewardship Report; water quality monitoring, public consultation, Operating Ground Rules and dispute resolution process.</i> SLS has updated the PAC membership to include a broader range of participants and has had a member from the Ghost Watershed Alliance Society for almost two years. See the current list of PAC members on the company website at:  <a href="http://www.spraylakesawmills.com/woodlands/public-involvement-process/fma-meeting-minutes/fma-public-advisory-committee-members/">http://www.spraylakesawmills.com/woodlands/public-involvement-process/fma-meeting-minutes/fma-public-advisory-committee-members/</a> During the October audit we met with the PAC and observed a meeting. The committee was seen by the team as superior to most we have countered. The PAC includes a variety of members, the cabal of fringe groups are upset as they are not on the PAC though a previous member from the cabal quit for reasons unknown.</p>	<p>Yes July 18, 2014        July 18, 2014</p>
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11	4.4.5	The PAC public participation process does not contain provisions for internal communications, resources, conflict of interest, mechanisms to adjust the process as needed, access to information, participation of experts, other interests and government, and a dispute resolution mechanism. Further, the terms of reference are not consistently used, to the extent that the functioning of the PAC is at risk.	Same as 10 above. During the PAC meeting we attended all of the members received significant documentation on a variety of subjects. They also discussed whether a consensus based approach was needed. We found the PAC operates very well and there is no risk to its existence or functioning.	Yes July 18, 2014
12	4.4.5	SLS has not established and maintained a list of interested and/or contacted parties with regards to PAC membership.	Same as 10 above. SLS has developed a PAC terms of reference and dispute resolution mechanism posted on the company website. It also maintains a list of potential PAC members SLS has contacted as well as a list of any potential members who have contacted SLS with an interest to participate. See Gord Lehn for details and reference the RA findings above.	Yes July 18, 2014
13	4.4.6	The PAC is not meaningfully integrated with forest management planning because it has not participated in review and evaluation of monitoring results since 2009 and it has no role in GDPs, FHPs or AOPs or in helping to resolve resource use conflicts.	Same as 10 above. SLS has minutes of public advisory group meetings related to operational plans that are posted on the company website. Reference: <a href="http://www.spraylakesawmills.com/woodlands/public-involvement-process/fma-meeting-minutes/">http://www.spraylakesawmills.com/woodlands/public-involvement-process/fma-meeting-minutes/</a>	Yes July 18, 2014
14	4.4.11	SLS could not provide a current socio-economic impact assessment that reflects its operations, or show how the available assessment is used to assist with the selection of the desired management option.	A revised SEIA dated May 14/2014 was provided to the audit team which meets the requirements of the standard.	Yes July 18, 2014

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15	4.5.3	<p>SLS does not have a process in place for fairly resolving disputes with other resource users and the general public. The current approach of relying on ASRD to resolve disputes is not satisfactory to interested parties or SLS in some cases.</p>	<p>SLS's dispute resolution policy is available on its website at the following link:  <a href="http://www.spraylakesawmills.com/woodlands/public-involvement-process/">http://www.spraylakesawmills.com/woodlands/public-involvement-process/</a> SLS also has a dispute resolution policy for First Nations outlined in its First Nations MOU found in: W:\FSC Certification\2014 Surveillance Audit\Minors 8_12 (Dispute resolution)\Dispute resolution Most conflicts found by the audit team were over land use and enforcement which are beyond the scope of this certification.</p>	<p>Yes July 18, 2014</p>
16	5.6.2	<p>SLS has completed a comprehensive timber supply analysis. However, this TSA was completed prior to the SLS decision to pursue FSC certification in 2010. This means that SLS has not demonstrated that the determination of harvest rates of forest products accurately reflects the requirements under other indicators.</p>	<p>SLS's FSC certification has not impacted the net land base used in calculating the sustained harvest level. Portions of the Red Deer River ESA are being evaluated for a protected area and portions of the passive landbase are being considered to be designed and used to serve as protected area reserves. All of SLS's protected area initiatives, at the earliest time possible will be incorporated into the next DFMP, targeted for completion in 2018. A new net land base calculation will be completed along with a new spatial harvest sequence to develop a new timber supply model for the DFMP. Currently, there is only mild interest (Nature Alberta) from 1 stakeholder regarding the designation of the Red Deer River ESA as a protected area. No other stakeholders or publics have shown support for this area to be formally protected. The only indication of any new protected areas from the government of Alberta (within the FMA) as outlined in the latest version of the South Saskatchewan Regional Plan includes 1.3 km in the Upper Foothills named the "Don Getty Extension." Additionally the RA report identifies that only 7.5% was set aside when in fact more than 14% was left. SLS has traditionally under harvested its allowable cut providing a buffer for constraints imposed by FSC certification. A new AAC is being modeled as part of the DFMP over the next two years, in conjunction with a new forest inventory.</p>	

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17	6.1.8	SLS has not provided benchmarks for snags and course woody debris which are key ecological attributes of forest condition at the stand level.	Benchmarks have been developed in the "Harvest Planning Policy " (sec 1.6) which addresses snags and course woody debris. During the audit ample down woody debris and live retention were found in the blocks, they exceeded the specific requirements set forth by the Province and meet the intent of the Boreal standard.	Yes July 18, 2014
18	6.1.10	SLS has not provided documentation that stand or site level assessments are consistent with indicator 6.1.8.	Preharvest surveys examine snags and retention. SLS has developed an updated Pre-Harvest Assessment (PHA) protocol tool that includes estimation of pre-harvest (benchmark) canopy closure, forest structure, CWD, and snags. SLS Field personnel have begun testing the protocol as of December 2013. NOTE discontinuity between indicator called and indicator quoted.	Yes July 18, 2014
19	6.1.11	SLS has not provided documentation that the results of the environmental assessments are incorporated into management planning and implementation.	Integration of benchmarking information collected with the pre-harvest assessment tool is now being used as the basis for developing plans and silvicultural prescriptions. Site specific prescriptions and or alternative management approaches are developed by forest management staff, based on findings and recommendations from the pre-harvest assessment information and have been done so for years. This information is identified on the detailed block maps as work instructions given to contractors. The new PHA forms identify any Douglas fir in cut blocks and recommend leaving them for retention. The following block numbers demonstrate examples where preharvest information was collected which then changed how operations were conducted: 1434 – wolf den identified and buffered, 0937 – Great Grey Owl nest identified and buffered.  2766 – old cabins from historic logging around early 1900's identified and sites removed from cutblock.	Yes July 18, 2014

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20	6.2.2	SLS has not delineated the habitats of all species at risk through field surveys or other means and that habitats are spatially identified where possible.	SLS has completed a thorough review of species at risk for the forest management unit and has outlined this work in the HCVF report along with management and monitoring strategies. SLS has also addressed the issue of Biodiversity and Wildlife Habitat Supply which includes Species at Risk habitat that was incorporated into the DFMP back in 2006. Reference page 15 of the 2013, 5-yr stewardship report on the web at <a href="http://www.spraylakesawmills.com/wp-content/uploads/2013/05/5-year-Stewardship-Report.pdf">http://www.spraylakesawmills.com/wp-content/uploads/2013/05/5-year-Stewardship-Report.pdf</a> for a synopsis of the work completed for development of the DFMP. SLS has also developed a SARA guidebook for field personnel and contractors. During the field audit operators were very familiar with the guidebook and knew what to do in the event of encountering a SAR.	Yes July 18, 2014
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21	6.2.5	<p>SLS has developed a precautionary approach for MIS but they have not yet developed a precautionary approach for plants and invertebrates at risk.</p>	<p>SLS's identified several HCVF's that include species at risk likely affected by forestry on the FMA. HCVF group 5, includes 21 vascular and non vascular plants; HCVF group 8, includes 6 rare ecological plant communities; and HCVF group 9, includes 5 unique and diverse habitats. SLS's HCVF document was subjected to 3 years of public involvement consultation as well as an "expert credible outside review". In October of 2013, SLS wrote a second version of the report to reflect findings in the review as well as incorporate suggestions received through the consultation process. Specific precautionary management strategies for invertebrates at risk such as various mosquitos and fly's did not surface as an issue requiring HCVF designation or specific precautionary management strategies. SLS contract biologists do not believe it makes practical or scientific sense to use invertebrate species as a MIS species nor to develop any precautionary management strategies for them. SLS's resource management team including contract biologists believe given the broad range of habitats being managed on a 100 year rotation along with the existing HCVF management plan that any additional specific precautionary approaches for invertebrates is totally unnecessary. It is our collective professional opinion that the precautionary MIS approach along with the species at risk and rare plant communities HCVF's, including species at risk plant HCVF's, identified in the HCVF report reasonably provides for the overall maintenance or enhancement of other species including invertebrates at risk.</p>	<p>Yes July 18, 2014</p>
22	6.2.6	<p><b>The audit team should</b> ensure that SLS has updated their training to all relevant forest workers on the identification of all species at risk, and on appropriate measures to take when a species at risk or sign of a species at risk (e.g., a nest) is identified during field operations.</p>	<p>SLS has no control over the audit team from Smartwood.</p>	<p>NA</p>

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23	6.3.5	<p>SLS will conduct a current condition analysis of older forests and compare to PIC; where older forests depart from PIC by more than 25% SLS will develop a old growth recruitment strategy to ensure no departure from PIC.</p>	<p>This is the same as NC3 (major) which has been closed. SLS submitted the following evidence for Major 02/12 for the 2013 PVA which resulted in the major being closed. SLS accomplished this by demonstrating through a forest growth model that SLS's FMA forest is moving towards 25% of the mean PIC data in all forest types on the FMA. When SLS asked for this NCR to be closed in 2013 they were told it was not in scope of the audit and the audit team was out of time. Updated report: "An Evaluation of the Pre-Industrial Forest Conditions, Spray Lake Sawmills FMA, Alberta" (Marie-Pierre Rogeau, January 2013).</p> <p>PIC Projections Report.doc: "Comparison of Current &amp; Future Forest levels to the Pre-Industrial Forest Conditions", 5pp. The report includes summaries of forest type area (ha) by age class (old, mature) and ecoregion (and compared to expected PIC range of variation) .</p> <p>Summary report of old forest amount and spatial distribution (including maps with current and projected distribution) (summary is included in PIC Projections Report.doc, maps are Appendices to PIC Projections Report.doc).</p> <p>PIC Analysis_70Year_OnlyGraphs.pdf: August 7, 2013 addendum to PIC Projections Report.doc that includes area summaries for all age classes (old, mature, young, regen)</p> <p>20130712115533053.pdf: Spatial Preferred Management Strategy Scenario/Area Weighted Coniferous Harvest Age</p> <p>Excerpted from the 2013 Rain Forest Alliance Audit findings:</p> <p>The 2012 Forest Management Certification Assessment Report stated:</p>	<p>Yes July 18, 2014</p>
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*SLS has provided no evidence that these under represented seral ages for specific species per subregions and quota area will be increased in abundance over the longer term." In particular, the findings for Indicator 6.3.4 stated that old forest seral stages in Lower Foothills, Upper Foothills, and Montane natural subregions (i.e., ecoregions) were greater than 25% below levels expected from the pre-industrial condition (based on 2001 benchmarks).*

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Current forest conditions have been updated to 2012 and revised projections of future forest conditions to 2081 were made using planned blocks and spatial harvest sequence data. The projections show that there is generally an excess of old forest relative to pre-industrial condition for all types and ecoregions over a 70 year horizon (PIC Analysis\_70Year\_Only Graphs.pdf). However, these projections also show the potential for shortfalls of younger age classes over the same time horizon, particularly in regenerating (1-20 years old) spruce types in all ecoregions, and regenerating pine in Upper Foothills, Lower Foothills, and Subalpine ecoregions. Regenerating mixedwood stands are also projected to have a shortfall after 70 years. For aspen, a deficit is projected in the mature forest age class (51-110 years old) in Lower Foothills and Montane ecoregions. Given the projected excess in old forest classes at 70 years, it is possible that a longer projection period would result in more of the older stands moving into regenerating or young age classes. Additionally, the models do not incorporate potential large-scale natural stand-replacing disturbances that would also alter the age class distribution. According to Rogeau (2013), the current age class distribution, particularly in pine which is weighted heavily to the mature age class, is largely a legacy of extensive fires in the late 1800s and early 1900s (many appeared to have been caused by humans). This legacy of a relatively homogenous age class creates some challenges in achieving a silviculturally regulated forest. The projected increase in area of old forest shows that SLS harvest rates would not exceed stand development rates into older age classes.



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			<p>Further, the 2012 Forest Management Certification Assessment Report stated: <i>Since 2001, SLS has continued to harvest old forest in each of these units as indicated in their DFMP.</i> Since the 2011 assessment, SLS has reviewed harvest maps to calculate the area of old forest (i.e., &gt;170 years old for pine and spruce types) harvested since 2001. Small amounts of old forest have been harvested since 2001, including: 236 ha (24 ha/year) of Upper Foothills pine in B9; 261 ha (26 ha/year) of Lower Foothills pine in B9; and 12 ha of Subalpine pine (1.2 ha/year) in upper B10. Though some harvesting of old forest has taken place, the small area harvested annually is evidence that SLS has not been targeting old forest stands for harvest. In addition, the current spatial distribution for old forest age classes of all types has been mapped and will be excluded from future harvests. Additionally, the SLS timber supply analysis does show that the average harvest age will increase over time, but again this is a legacy of the current age class distribution.</p> <p>Overall, SLS has provided evidence that old forest communities which are significantly under-represented relative to the pre-industrial composition are being increased in abundance over the longer term. In the near term, their abundance is being maintained and projections show the intent to increase old forest over the longer term.</p>	
24	6.3.6	SLS will set targets for landscape patterns based on the pre-industrial forest conditions.	<p>Targets have been set based on the PIC analysis. "An Evaluation of the Pre-Industrial Forest Conditions, Spray Lake Sawmills FMA, Alberta" (Marie-Pierre Rogeau, January 2013). These targets have been outlined in the HCVF monitoring and management strategies found in the October 2013 HCVF Assessment. <a href="http://www.spraylakesawmills.com/wp-content/uploads/2013/05/HCVF-v2-October-15-2013-Final.pdf">http://www.spraylakesawmills.com/wp-content/uploads/2013/05/HCVF-v2-October-15-2013-Final.pdf</a> SLS utilizes provincial guides, ground rules and planning approaches which are all precautionary by nature.</p>	Yes July 18, 2014

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25	6.3.9	SLS should ensure the protection of all occurrence of interior Douglas-fir, rare plants and plant communities.	SLS Management prescriptions outline protection of Douglas Fir and other outlier tree species for every cutblock. SLS has a policy to protect outlier tree species such as Douglas fir, white pine and limber pine. This policy is found in section 1.6 Preliminary Assessment and Harvest Design under the Minimum Retention Target Summary table found in the Harvest Planning Operations Woodlands Manual. Reference Operations Manuals. This information has also been presented at the annual contractor training meetings the last few years. Reference Contractor Training Manuals. SLS has identified all rare plants and communities in its SAR Manual, this includes a variety of tree and plant species. As well HCV for rare plant communities have been established.	Yes July 18, 2014
26	6.3.10	SLS should revise the Operating Ground Rules to ensure that retention of pre-harvest structures are well distributed throughout the block	In 2013, SLS revamped its snag and coarse woody debris retention policy to include the importance of in block retention that is well distributed and representative of the pre-harvest stand, reference section 1.6 Preliminary Assessment and Harvest Design of the Woodlands Operations Manual located at: W:\FSC Certification\2014 FAA\Minor 17_26 (Pre-harvest structure)\2013 WOM. SLS provided its updated policy information during its 2013 spring contractors training, reference the 2013 contractors training manual at: W:\FSC Certification\2014 FAA\Administration\Contractor Training Manuals. During the field audit in October all harvest blocks had ample retention throughout the blocks.	Yes July 18, 2014

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27	6.3.14	SLS has not defined quantitative habitat objectives for their Management Indicator Species.	The DFMP contains objectives and strategies for wildlife habitat covering 18 key species across the FMA. SLS has developed a quantitative habitat objective for monitoring wildlife management indicator species habitat. SLS will monitor land area supply of indicator species habitat at DFMP renewal periods, based on DFMP baselines and TSA projections, for focal species taking into account timber harvest and natural succession. Reference page 117 in section 5 HCVF management and monitoring strategies in the October 2013 HCVF Assessment Report located on the company website at <a href="http://www.spraylakesawmills.com/wp-content/uploads/2013/05/HCVF-v2-October-15-2013-Final.pdf">http://www.spraylakesawmills.com/wp-content/uploads/2013/05/HCVF-v2-October-15-2013-Final.pdf</a>	Yes July 18, 2014
28	6.3.16	SLS has not identified that a balance between the ecological, social and economic importance of remoteness and the recreational interest for motorized access has been achieved.	SLS has demonstrated a balance between the ecological, social and economic importance of remoteness and the recreational interest for motorized access when writing its Detailed Forest Management Plan in 2006. Some of the DFMP 18 issues and value objectives developed from public consultation include the maintenance and or enhancement of biodiversity and wildlife habitat supply, aesthetic values, community timber supply, forest health, soil conservation, public involvement, and integration of other values and non-commercial users among others. SLS has detailed road maintenance and road use policies and is reclaiming 100% of its new roads which demonstrates an appreciation for remoteness.	Yes July 18, 2014

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29	6.3.17	SLS OGRs define protection on ephemeral, intermittent and small streams that is less than FSC requirements.	<p>The Boreal Standard does not contain specific requirements with regards to the protection ephemeral and intermittent streams. The company has specific protection measure in the operating ground rules which address all ephemeral, intermittent and small streams. <b>The Boreal Standard does not specifically address intermittent and ephemeral streams:</b></p> <p><i>6.3.17 Forests surrounding or adjoining permanent water bodies are protected by riparian reserves that exclude all forestry activity (harvest, road building except for approved crossings, dumping, etc). The inner riparian reserves are a minimum width of 20 meters from the treed edge of permanent water bodies. Partial harvesting within the inner reserves is permitted subject to public consultation and only to a limited extent based on a conservation or cultural rationale. Additional riparian reserves are applied to maintain fish and wildlife habitat and/or cultural and recreational values, as appropriate. The minimum total area within these additional reserves shall be equivalent to an additional 45 meters, on average, measured from the end of the inner riparian reserve. The applicant may develop and apply an alternative protection prescription that varies from the additional 45m average reserve if it is demonstrable that the ecological rationale has an equal or higher likelihood of achieving the objective to protect riparian values.</i></p>	Unfounded
30	6.3.18	SLS OGRs prescribe the buffer requirements on some but not all water bodies and watercourses. Specifically, wetlands are not classified, and buffer requirements are not defined for wetlands and ephemeral streams.	<p>SLS developed an ephemeral draw and wetlands best management practices policy that is outlined in the 2013 and 2014 Contractors Training Manual. Reference W:\FSC Certification\2014 Surveillance Audit\Administration\Contractor Training Manuals. <b>There are no requirements in the Boreal Standard for buffers on wetlands. The Boreal Standard states ephemerals are to be considered, yet there is no specific buffer requirement.</b></p>	Unfounded

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31	6.3.19	<p>SLS has not demonstrated that they have incentives or joint planning programs or is making demonstrable progress towards:          Encouraging other tenure holders to adhere to the access management plan as described in 6.3.16;          Minimizing size, intensity, and duration of linear disturbances and other disruptions to ecosystem functions; and,          Encouraging other forest tenure holders to adhere to the forest structure retention requirements under 6.3.</p>	<p>SLS is doing its part on minimizing size, intensity and duration of linear disturbances to ecosystem functions as demonstrated by its monitoring results concerning road construction and reclamation efforts. It should be noted that SLS reclaims (obliterates) all access roads. SLS has evidence it has been contacting other tenure holders while planning operations to minimize its footprint as evidenced in its 2013 stewardship report. SLS invited all of the known forestry operators within the FMA urging them to follow the ground rules concerning retention targets and following access management plans. SLS has invited all of the quota holders on the FMA (there are no CTP holders this year) to attend the Spring contractors training for the last two years. SLS can show the invitations of the quota holders to demonstrate the outreach is occurring. SLS leaves between 3% and 5% retention on harvest sites which is above the provincial requirement of 1%.</p>	<p>Yes July 18, 2014</p>
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32	6.4.2	SLS has not identified and contributed candidate protected areas.	<p>Analysis in March of 2013. In July of 2013, SLS completed the second version to include public input and peer review comments. SLS has identified the following areas to fill gaps and serve as the protected areas network: 1) The Red Deer River ESA and; 2) The passive landbase areas designed to meet specific ecological objectives and serve as permanent reserves. SLS has assessed the foothills subregion passive landbase (the ecological subregion having gaps) for ecological integrity and has been working with with interested parties on an ongoing basis since the planned November 14, 2013 Protected Areas Design Workshop. Portions of the passive and active landbase will be designed with stakeholders to contribute to a protected area network beyond the management unit. The gap analysis is located in the folder: ftp: \FSC Certification\2013 PVA\Major 4 &amp; Minors (PA's)\Gap Analysis. 3) While a member on the Regional Advisory Council for the South Saskatchewan Regional Plan (the process in Alberta that designates land use) SLS supported the designation of 9 candidate conservation areas (these may include formal protection) in the basin. Two of the areas are within and immediately adjacent to the FMA including: candidate #8 and #9, these areas are discussed in the gap analysis. The government of Alberta has started the draft SSRP, including the inclusion of additional provincial protected areas will be available for public comment this fall. July 2014 update:</p> <p>1) SLS is continuing to defer harvest in the Red Deer River ESA.          2) SLS has conducted 3 protected areas design workshops to work with stakeholders as described in the PA gap analysis.          3) SLS has provided a schedule describing PA objectives and timelines.</p> <p>W:\FSC Certification\2014 Surveillance Audit\Minor 1 (Public communication)\Consultations &amp; Workshops\Protected Areas Workshops</p>	Yes July 18, 2014
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33	6.4.3	<p>SLS has not demonstrated that they have worked cooperatively with interested parties in the analysis of gaps and candidate protected areas.</p>	<p>The ENGO, Nature Alberta is cooperatively working with SLS by discussing protected area options and has formally shown an interest to explore preliminary protected area(s) candidates in the Red Deer River ESA. See folder: ftp:\FSC Certification\2013 PVA\Major 4 &amp; Minors (PA's)\PA advocacy email evidence. SLS is continuing to identify and engage interested parties in developing protected areas to fill gaps. SLS has identified the following areas to fill gaps and serve as the protected areas network: 1) The Red Deer River ESA and; 2) The passive landbase areas to be designed to meet specific ecological objectives and serve as permanent reserves. SLS has assessed the foothills subregion passive landbase (the ecological subregion having gaps) for ecological integrity and has been working with interested parties since the November 14, 2013 Protected Areas Design Workshop. Portions of the passive and active landbase will be designed with stakeholders to contribute to a protected area network beyond the management unit. July 2014 update:</p> <ol style="list-style-type: none"> <li>1) SLS is continuing to defer harvest in the Red Deer River ESA.</li> <li>2) SLS has conducted 3 protected areas design workshops to work with stakeholders as described in the PA gap analysis.</li> <li>3) SLS has provided a schedule describing PA objectives and timelines.</li> </ol> <p>W:\FSC Certification\2014 Surveillance Audit\Minor 1 (Public communication)\Consultations &amp; Workshops\Protected Areas Workshops</p>	Yes July 18, 2014
34	6.4.4	<p>SLS is in non-conformance with indicators 6.4.1, 6.4.2 and 6.4.3 therefore the assessment team was unable to determine conformance to 6.4.4. If SLS designates candidate protected areas when addressing MAJOR NCR 04/12, NCR 32/12, and NCR 33/12, these areas must be mapped.</p>	<p>SLS has mapped candidate areas to serve as potential protected areas with stakeholders. SLS can produce these maps upon request. Maps have been provided of the candidate protected areas including the Red Deer River ESA - operations are being deferred for these areas. In due course these areas may be regulated as protected areas (parks) by the Province.</p>	Yes July 18, 2014

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35	6.4.5	SLS has not provided documentation demonstrating support by interested parties.	<p>The ENGO, Nature Alberta is cooperatively working with SLS by discussing protected area options and has formally shown an interest to explore preliminary protected area(s) candidates in the Red Deer River ESA. See folder: ftp:\FSC Certification\2013 PVA\Major 4 &amp; Minors (PA's)\PA advocacy email evidence. Thus far, SLS has found meeting this NCR challenging due to the apparent shortage of "interested parties". SLS has hosted 3 formal public consultations/workshops this year to share its Gap Analysis Report and engage the public, First Nations and ENGO's with the intent of cooperatively working with interested parties. SLS has publicized the consultations/workshops in the Calgary Herald, Cochrane Times, Cochrane Eagle, and the Sundre Roundup newspapers. SLS has publicized the public consultation sessions on its website and emailed stakeholders with workshop invitations, followed up with personal phone calls. The evidence for the advertisements can be viewed in the folder: 2013 PVA/Major1/advertisements. The consultation/workshop information can be found at ftp:/FSC Certification/2013 PVA/Major 1 (public participation)/Consultations &amp; Workshops. SLS posted the gap analysis on its website in April of 2013. It can be found on the web at:  <a href="http://www.spraylakesawmills.com/woodlands/forest-certification">http://www.spraylakesawmills.com/woodlands/forest-certification</a>. Personal follow-up phone calls have been documented in the folder: ftp:\FSC Certification\2013 PVA\Major 1 (public participation)\Public Communications Record and in Gord Lehns public communication binder.</p>	Yes July 18, 2014
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36	6.4.6	<p>SLS should provide evidence that there is no harvesting, silviculture and road-building in candidate protected areas, if they are established when addressing MAJOR NCR 04/12, NCR 32/12 and NCR 33/12.</p>	<p>SLS has identified the following areas to fill gaps and serve as the protected areas network: 1) The Red Deer River ESA and; 2) The passive landbase areas that will be designed to meet specific ecological objectives and serve as permanent reserves and; 3) The SSRP Candidate Conservation Areas #8 and #9. SLS has provided maps with past, current and future harvest activities as evidence, that SLS is not planning on harvesting in these areas. These maps are located in the folder: ftp:\FSC Certification\2013 PVA\Major 4 &amp; Minors (PA's)\Minors 32_37 Synopsis\Maps On June 12, 2013. SLS provided a HCVF and protected areas gap analysis presentation to the Bow River Basin Council's, Annual General Meeting in Calgary, Alberta. During the presentation, SLS encouraged the 50 participant members of the Bow River Basin Council to engage in the protected areas discussion and support SLS's FSC certification. This evidence is located in the folder: ftp:\FSC Certification\2013 PVA\Major 1 (public participation)\Consultations &amp; Workshops\BRBC June 12, 2013.</p> <p>2013 PVA Findings:</p> <p><i>The gap analysis states that SLS is deferring management activities in the proposed conservation management areas and will support protected area designation as agreement is reached with all stakeholders, the public and the government of Alberta. Portions of the Red Deer ESA have been identified as having the potential to meet protected areas targets. This area has also been identified as a possible HCVF and SLS has deferred harvesting in the area.</i></p>	<p>Yes July 18, 2014</p>
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37 6.4.7

SLS is required to provide evidence that they are working within their sphere of influence to move any candidate protected areas identified when SLS addresses MAJOR NCR 04/12, NCR 32/12 and NCR 33/12 to full regulated protection as soon as possible

In addition to public workshops, SLS has solicited (protected area) specific organizations likely to be interested parties. SLS has recorded these efforts in the folder: ftp:\FSC Certification\2013 PVA\Major 4 & Minors (PA's)\PA advocacy email evidence and in Gord Lehns public participation binder. SLS has compiled all of the known protected area gap analysis feedback in the folder ftp:\FSC Certification\2013 PVA\Major 4 & Minors (PA's)\PA- Public input. Even though, the tone of approximately 66% of the written ENGO feedback is currently less than "interested". SLS is pleased with having 33% of the written ENGO feedback as "interested" in working with SLS. SLS is continuing its ongoing communications with stakeholders, and obtained feedback from the second version of the gap analysis and by hosting the Protected Areas Design Workshop on November 14, 2013. SLS solicited input from the version 2 Gap analysis at the August 8th, 2013 PAC meeting.

2013 Smartwood PVA findings: *Nature Alberta has expressed formal and written support for the SLS process for identifying candidate protected areas. However, other interested parties have only recently begun to be involved in the process. Minor NCR 35/12 remains open until the process is further along and more engagement with interested parties is documented.*

July 2014 update:

- 1) SLS is continuing to defer harvest in the Red Deer River ESA.
- 2) SLS has conducted 3 protected areas design workshops to work with stakeholders as described in the PA gap analysis.
- 3) SLS has provided a schedule describing PA objectives and timelines.

Yes July 18, 2014

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			W:\FSC Certification\2014 Surveillance Audit\Minor 1 (Public communication)\Consultations & Workshops\Protected Areas Workshops SLS has a defined strategy for filling protected area gaps, in order to move candidates to fully regulated protection and is executing on the strategy and has plans to continue consultation with stakeholders with the upcoming release of the second gap analysis.	
38	6.5.1	Standard Operating Procedures relating to soil rutting are not being fully implemented. Stakeholder consultation and field visits confirmed that in at least one instance, rutting ground rules were not followed. Ruts extending for several hundred meters along a main access road were observed, resulting in transporting silt down slope and into a temporary watercourse.	A "temporary watercourse" is not a defined stream classification in Alberta. Ruts were caused by site prep contractor which no longer work for the company. The road has been reclaimed. SLS has added provisions to its road management policies concerning erosion control. These provisions have been incorporated into the 2013 Woodlands Operations Manual. The added provisions have also been incorporated into this 2013 and 2014 Spring Contractor Training. Reference W:\FSC Certification\2014 Surveillance Audit\Administration\Contractor Training Manuals	Yes July 18, 2014

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39	6.5.1	SLS has not identified sites and watersheds sensitive to negative hydrological impacts and nor have they identified the levels of permissible harvesting in watersheds.	SLS's Forest Management Agreement Area's net land base was based on the premise that harvesting was suitable in the area as determined from the land use zoning work completed by Government of Alberta resource professionals who wrote the Integrated Resource Plan. As an example timber harvesting is permitted on approximately 25% of Kananaskis Country. The other 75% has been zoned by and large for watershed protection. Within the FMA a passive landbase was created that further withdrew lands having sensitive sites such as wetlands, water, slopes greater than 45% and riparian buffers. SLS is in the process of exploring additional tools to quantify peak flow metrics within the FMA as suggested in the credible outside review for category 4 of the HCVF document. The Province has requirements for ensuring that harvest levels in watersheds do not exceed reasonable thresholds. The DFMP identifies harvest levels by watershed which are within the provincially permissible levels.	Yes July 18, 2014
40	6.5.2	The assessment team visited a site during the field tour where extensive rutting occurred. In discussion with SLS staff it was apparent that the contractor did not follow SOPs for avoiding soil erosion.	Ruts were caused by site prep contractor which no longer works for the company. The road has been reclaimed. SLS has added provisions to its road management policies concerning erosion control. These provisions have been incorporated into the 2013 Woodlands Operations Manual. The added provisions have also been incorporated into this 2013 and 2014 Spring Contractor Training. Reference Contractor Training Manuals THIS IS THE SAME AS 38	Yes July 18, 2014
41	6.5.3	SLS inspects operations regularly and reports in detail on the effectiveness of many of the OGR requirements. However, the effectiveness of riparian buffers on ephemeral streams and wetlands are not consistently monitored. In addition, it is unclear how the results of inspections and monitoring are used in the context of adaptive management.	There are no requirements in Alberta or the Boreal standard to buffer ephemeral streams or wetlands. The requirement is to not skid along them or through wetlands. No evidence was seen in the field of degrading wetlands and ephemeral streams.  The adaptive management component is taken up in the planning process and the review of operations.	UNFOUNDED

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42	6.6.3	SLS uses no chemical pesticides for silviculture and very few chemical pesticides for roadside invasive weed control. Quota holders and some overlapping tenure holders also use chemical pesticides for invasive roadside weed control. The volume used of these chemical pesticides is not quantified and their continual reduction cannot be verified.	<b>Spray Lakes does not use chemicals for any purpose.</b> Counties spray roadsides of public roads which are out of scope of this certification. Quota holders have not applied chemicals in a number of years. In 2010 one quota holder sprayed for SIP but this was less than 20 ha.	UNFOUNDED
43	6.6.4	SLS has provided no evidence that they support and/or participate in the development and adoption of non-chemical methods of pest management.	This indicator does not apply as they do not utilize chemicals	UNFOUNDED
44	6.6.5	SLS has not demonstrated that they minimize health and safety risks related to chemical and pesticide use.	SLS has done this by not using chemicals, therefore they have demonstrated zero risk due to non-use.	UNFOUNDED

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45	6.10.6	SLS has not provided evidence that they are actively working with OHV groups with recreational siting agreement tenures to limit conversions of productive forest land to non-productive forest land uses.	SLS meets with members of the OHV community (and has been since 1995) while participating on the Ghost Stewardship Monitoring group to share its management plans and discuss OHV trail management concerns. SLS also has OHV representatives on its Public Advisory Committee in part to share management plans and discuss the importance of following access management plans, minimizing the size, intensity and duration of linear disturbances to ecosystem functions and brainstorming for ideas to better manage OHV use on the FMA. SLS confirmed that they continue to report instances of illegal activity to the AESRD when encountered by SLS employees. SLS can provide meeting minutes and dates when it has met with OHV groups. <b>There is no such thing as a recreational siting tenure in Alberta.</b> Evidence from the forest inventory shows no significant conversion - typically old gas wells for 1 to 2 ha/year (deminimus).	Yes July 18, 2014
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46	7.1.7	<p>The DFMP was initiated with a listing of issues and values, which SLS describes as including a socio-economic impact assessment (SEIA). However, the team has written NCR 46/12 because the DFMP does not include socio-economic conditions of communities within, adjacent to, and dependent upon the forest, and the forest's contribution to their socio-economies, which is commonly found in a SEIA and is a requirement of P7. The SLS DFMP Chapter 4 provides an extensive summary of the public involvement process used to complete the DFMP. However, many interested parties expressed concern about not having been meaningfully consulted during the preparation of the DFMP. The current forest(s) history management regime, and significant ecological or social issues related to adjacent forest lands are not adequately described. Refer to related NCR 46/12; The SLS DFMP does not contain all required elements. Socio-economic conditions of communities within, adjacent to, and dependent upon the forest, and the forest's contribution to their socio-economies are not described. As a result NCR 46/12 is written; Indigenous Peoples' and treaty interests as consistent with Principle 3 are not described. As a result NCR 46/12 is written.</p>	<p>The audit team examined community level economic data as part of the SEIA. It should be noted that many of the stakeholders are from hamlets and areas which are not considered as communities by Stats Canada. The next version of the DFMP will incorporate the SEIA findings.</p>	Yes July 18, 2014
47	7.2.2	<p>The data gathered for monitoring has not been summarized and nor have the results been used to revise management practices as required under adaptive management.</p>	<p>Monitoring summary data is provided in the 5yr stewardship report. Data has been used to look at peak flow response to harvest.</p>	Yes July 18, 2014

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48	8.1.3	The SLS monitoring Plan will be reviewed and revised at the renewal of the DFMP in 2018. Given that the results of monitoring have not been compiled and summarized and have not been released to the public, this date is not consistent with the parameters being monitored and developments in monitoring technologies.	The 5 year stewardship report has been posted on the company website since February 2013. <a href="http://www.spraylakesawmills.com/wp-content/uploads/2013/05/5-year-Stewardship-Report.pdf">http://www.spraylakesawmills.com/wp-content/uploads/2013/05/5-year-Stewardship-Report.pdf</a> This public report contains summarized monitoring results.	Yes July 18, 2014
49	8.2.3	SLS in conjunction with ASRD monitors the condition of the forest including but not limited to forest health, disturbance, and age class structure. However, records of this monitoring were not provided to the assessment team.	The 5 year stewardship report has been posted on the company website since February 2013. <a href="http://www.spraylakesawmills.com/wp-content/uploads/2013/05/5-year-Stewardship-Report.pdf">http://www.spraylakesawmills.com/wp-content/uploads/2013/05/5-year-Stewardship-Report.pdf</a>	Yes July 18, 2014
50	8.2.6	There is not a comprehensive monitoring program that assesses the environmental impacts of forest management activities with regards to erosion control; minimizing forest damage during harvesting, road construction and all other mechanical disturbances; and protecting water resources.	The 5 year stewardship report has been posted on the company website since February 2013. <a href="http://www.spraylakesawmills.com/wp-content/uploads/2013/05/5-year-Stewardship-Report.pdf">http://www.spraylakesawmills.com/wp-content/uploads/2013/05/5-year-Stewardship-Report.pdf</a>	Yes July 18, 2014



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51	8.2.11	SLS has not demonstrated how they assess information and knowledge related to forest management and incorporates it into the research and data collection program.	The Operating Ground Rules, the HCVF management and monitoring strategies and the 18 DFMP objectives and targets explicitly detail how SLS is to assess/mitigate/manage the environmental impacts of forest operations regarding erosion control; minimizing forest damage during harvesting, road construction and all other mechanical disturbances; and protecting water resources. SLS is responsible for completing block and road inspections; and the monitoring for both the DFMP and the HCVF report. As an example, SLS can demonstrate some of the 5-year stewardship report monitoring results are being used to make improvements to the 2018 DFMP that is currently being developed. The 5 year stewardship report has been posted on the company website since February 2013. <a href="http://www.spraylakesawmills.com/wp-content/uploads/2013/05/5-year-Stewardship-Report.pdf">http://www.spraylakesawmills.com/wp-content/uploads/2013/05/5-year-Stewardship-Report.pdf</a>	Yes July 18, 2014
52	8.4.1	SLS has committed to incorporating the results of monitoring into revisions of the DFMP and HCVF report. However, many of the elements identified in Chapter 10 of the DFMP are being monitored, but not all of the data has been compiled. As a result, the results of monitoring have not been incorporated into the implementation and revision of the management plan.	The 5 year stewardship report has been posted on the company website since February 2013. SLS has also shared and explained the report with the Public Advisory Committee and with the public and stakeholders at workshops. SLS received input from the PAC and stakeholders and provided a second version of the stewardship report in July of 2013 to address stakeholder concerns. SLS will be incorporating a number of changes to the next DFMP and stewardship report as a result of the adaptive management process.	Yes July 18, 2014

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53	8.5.1	A summary of the results of monitoring activities has not yet been made available to the public.	The 5 year stewardship report has been posted on the company website since February 2013. SLS has also shared and explained the report with the Public Advisory Committee and with the public and stakeholders at workshops. SLS received input from the PAC and stakeholders and provided a second version of the stewardship report in July of 2013 to address stakeholder concerns.	Yes July 18, 2014
54	9.1.1	SLS has identified and mapped most HCVFs according to the requirements of the standard. However, the assessment team has identified at least two inadequacies in the report. The first is in the exclusion of the North Burnt Timber ESA from HCVF Items 3 and 12 without a rationale. The second inadequacy is the omission of grizzly bear core and secondary habitat mapping within the DFA.	The October 2013, HCVF Assessment version 2 report clarifies that the headwaters area of the North Burnt Timber Creek (identified by Fierra consulting as ESA's) are included as an HCVF. Reference: <a href="http://www.spraylakesawmills.com/wp-content/uploads/2013/05/HCVF-v2-October-15-2013-Final.pdf">http://www.spraylakesawmills.com/wp-content/uploads/2013/05/HCVF-v2-October-15-2013-Final.pdf</a> Page 37 paragraph 4. SLS has not added grizzly bear core and secondary habitat mapping to the document as these attributes are not referenced in the report or used to designate HCVF's. The author (John Kansas Professional Biologist) suggested the Grizzly Bear mapping information is simply road density information that was already discussed in the report and was used to designate remnant and large landscape level forests. As stated in the HCVF report, SLS has designated the entire FMA as a Grizzly Bear HCVF.	Yes July 18, 2014
55	9.1.2	SLS has involved qualified specialists for most sections of the HCVF report, but the assessment team was not provided evidence of specialists being involved in the development of Section 4: Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	On July of 2013, Hatfield Consultants reviewed, validated and edited Section 4: Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control) of the HCVF Assessment. The Hatfield team included Rick Courtney-Fisheries Biologist; Dan Bewley- Hydrologist and Chris Briggs-Aquatic Biologist. Reference page vii of the HCVF document on the company website at <a href="http://www.spraylakesawmills.com/wp-content/uploads/2013/05/HCVF-v2-October-15-2013-Final.pdf">http://www.spraylakesawmills.com/wp-content/uploads/2013/05/HCVF-v2-October-15-2013-Final.pdf</a>	Yes July 18, 2014

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56	9.1.3	The assessment team was not presented with evidence that a credible outside review was conducted and, in addition, that review has not been presented to the public.	The HCVF report was peer reviewed by Dr. Luigi Morgantini on July 15th 2013 and posted on the company website found at <a href="http://www.spraylakesawmills.com/wp-content/uploads/2013/05/LM-review-SLS-HCVF.pdf">http://www.spraylakesawmills.com/wp-content/uploads/2013/05/LM-review-SLS-HCVF.pdf</a> . On March 13, 2014 Applied Aquatic Research provided a credible outside review of Section 4: Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control). Reference: W:\FSC Certification\2014 Surveillance Audit\Minors 54-62 (HCVF)\Cat 4 Credible Outside Review. SLS is in the process of developing a response to the review and updating the HCVF report to address the findings in the review. SLS will post the review on the website after it updates the HCVF scheduled for August of 2014.	Yes July 18, 2014
57	9.2.1	While SLS has contacted stakeholders and other interested parties regarding the HCVF report, and they have received comments about the report, they have not responded to these comments and included a rationale for their inclusion or exclusion in the HCVF report. In addition, SLS has not included specific measures that ensure the maintenance of conservation attributes consistent with the precautionary approach in their Management Plan.	SLS has documented it's HCVF workshops and the subsequent opportunities for the public and stakeholders to provide comments as well as SLS's responses to the feedback received. Reference the company website <a href="http://www.spraylakesawmills.com/woodlands/forest-certification/high-conservation-value-forest-assessment-hcvf/">http://www.spraylakesawmills.com/woodlands/forest-certification/high-conservation-value-forest-assessment-hcvf/</a> SLS has rewritten the HCVF management and effectiveness monitoring strategies to ensure the maintenance of conservation attributes consistent with the precautionary approach. Reference page 113 of the HCVF report on the company website at: <a href="http://www.spraylakesawmills.com/woodlands/forest-certification/high-conservation-value-forest-assessment-hcvf/">http://www.spraylakesawmills.com/woodlands/forest-certification/high-conservation-value-forest-assessment-hcvf/</a> .	Yes July 18, 2014

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58	9.3.1	SLS has not provided evidence to demonstrate that they have deferred or avoided scheduling logging in large landscape level forests until a credible conservation plan or peer reviewed gap analysis is completed.	SLS has completed two versions of a protected areas gap analysis to include public comment, reference the company website at: <a href="http://www.spraylakesawmills.com/wp-content/uploads/2013/08/Final-Draft-Version-2-PAGA-July-26-2013.pdf">http://www.spraylakesawmills.com/wp-content/uploads/2013/08/Final-Draft-Version-2-PAGA-July-26-2013.pdf</a> . SLS has identified gaps in the Foothills subregion and multiple sources to fill them. The strategies for filling gaps and the precautionary management approaches to maintain or enhance these areas have been addressed in the Gap analysis and HCVF reports. SLS has mapped the Red Deer River ESA and has deferred logging in this area. SLS has also mapped the SSRP Candidate Conservation Areas and has deferred harvesting in those areas as well.	Yes July 18, 2014
59	9.3.2	SLS has not provided evidence to demonstrate attempts to coordinate activities with adjacent managers and land users to maintain or enhance the applicable conservation attributes. This NCR is considered Minor as SLS has agreed to defer harvesting in these areas until the requirements of NCR 59/12 are met.	SLS has been engaging the public, stakeholder groups, First Nations, and the Metis to identify areas for filling protected areas gaps. SLS is not aware of a specific High Conservation Value Forest that straddles a management unit that is potentially affected by existing or proposed activities. At this time in the process, SLS has not validated any particular candidate protected area that would warrant a coordination of activities with adjacent managers to maintain or enhance the applicable conservation attributes. It needs to be noted that the FMA is bordered by and Kananaskis Country (a complex of provincial parks and reserves) that connects to Banff National Park.	Yes July 18, 2014
60	9.3.3	SLS has not provided evidence to demonstrate that the management strategies are being implemented nor that all of the strategies are precautionary.	This NC relates to Grizzly Bear habitat and minor tree species such as Douglas Fir. Over the past 5 years road densities have been reduced by 10% - this is the major contributor to Grizzly Bear habitat – it should be noted that the entire forest is an HCV for Grizzly Bears.	Yes July 18, 2014

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			<p>The protection of Douglas Fir is intact as Douglas Fir is retained within harvest blocks and within in the “passive landbase”, where harvesting does not occur.</p> <p>Both the destruction of roads and the protection of Douglas fir sites are in themselves precautionary.</p>	
61	9.4.1	SLS has developed a monitoring plan, however, the strategies for HCVF Group #14 and #15 do not adequately measure the effectiveness of the strategies employed.	Specific effectiveness measures have been added to HCVF group #14 and #15. Reference page 126 of the version 2 HCVF Assessment.	Yes July 18, 2014
62	9.4.2	The monitoring program is not capable of alerting SLS to changes in the status of the HCVF conservation measures and thus there is no ability for SLS to re-evaluate whether the management strategies are effective.	Scheduled benchmark assessments have been incorporated to provide a mechanism to alert managers to changes in HCVF attributes. SLS is committed to the implementation of the management and monitoring strategies identified in the High Conservation Value Forest assessment. SLS’s HCVF management strategies and effectiveness monitoring program will be ongoing and long-term to include regular corporate review and an adaptive management response process. SLS has formed an HCVF management review team that will annually assess HCVF monitoring results and is responsible for making responsive changes to management strategies, Operating Ground Rules (along with AESRD) and or corporate policy, when it is evident that current management strategies are ineffective in meeting the HCVF Objectives. As indicated in FSC principal 8.2.5, SLS’s efforts will be focused on maintaining, enhancing and monitoring terrestrial HCVF focal species habitat. SLS will continue to participate with and rely on the Alberta Environment and Sustainable Resource Development, Fish and Wildlife Division for monitoring individual species on the FMA.	Yes July 18, 2014

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63		SLS has not developed a set of procedures to ensure: that non-FSC certified material is not represented as FSC certified on sales and shipping documentation; the FSC certificate registration code and FSC claim are used on all sales and shipping documentation for sales of FSC certified products; compliance with all applicable FSC/Rainforest Alliance/SmartWood trademark use requirements.	The CoC audit complete certification granted in Oct 2014 based on compliance with FSC-std-40-004 v2.1 and fsc-std-40-005 v2.	Yes July 18, 2014
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