



**Bureau Veritas Certification
North America, Inc.
SFI Forest Management Audit Report**

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PQC Code	E01E
Contract Number	US 2736092

Certification Audit:		Re-Certification Audit:		Surveillance Audit:	#4	Scope extension audit:	
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Audit Summary
<p align="center">Introduction</p> <p>This report summarizes the results of the fourth surveillance audit conducted on the Missouri Department of Conservation’s (MDC’s) SFI program for forest management. The audit was conducted by Mr. Richard Boitnott, Bureau Veritas Certification lead auditor. Mr. Boitnott is an SAF certified forester, a Texas accredited forester, and has wildlife management expertise. He worked for forest industry for 22 years in a variety of forestry and wildlife management positions before beginning his auditing career over 20 years ago.</p> <p align="center">Audit Scope, Objectives and Process</p> <p>The scope of this audit is “land management on Department of Conservation owned land in the state of Missouri”. The audit was conducted against the SFI 2015-2019 Standard Forest Management Edition. All SFI Objectives were covered during the audit. There was no substitution or modification of indicators. Specifically, two objectives of the SFI audit were to verify that the Program Participant’s SFI Program is in conformance with the SFI Objectives, Performance Measures, and Indicators, and any additional indicators that the Program Participant chooses, and verify whether the Program Participant has effectively implemented its SFI Standard program requirements on the ground. Standard Bureau Veritas Certification protocols and forms were applied throughout the audit as provided by the most recent version of the Bureau Veritas Certification SFI Auditor Handbook available on the auditor access website.</p> <p align="center">Audit Plan</p> <p>The audit began with an opening meeting on 9/28/2021 followed by a review of system documentation in the morning for ½ day. This was followed by a field audit on one conservation area in the Southwest region during the afternoon. The field audit continued on the 29th on four conservation areas in the Ozark region, and on two conservation areas on the 30th, again in the Ozark region. A closing meeting held at the close of business on the 30th. An audit plan was developed and is on file with Bureau Veritas Certification.</p> <p align="center">Company Information</p> <p>The Missouri Conservation Department is a public entity tasked with restoring, conserving, and</p>

regulating Missouri’s fisheries, forests, and wildlife. The department manages more than 975,000 acres of land in the state, of which approximately 696,630 are forested and covered by the scope of this audit. The forest type is generally an oak-hickory forest, mixed with some shortleaf pine. However, a portion of the ownership is located in the Mississippi alluvial plain, consisting of a bottomland forest. The agency also manages a considerable amount of open land interspersed in its forested areas. Most of the ownership is moderately to relatively steeply dissected, with the exception of the bottomland areas. MDC manages its forest using natural regeneration. Very little clearcutting occurs, and the only herbicide use is for the control of invasive species and to conduct timber stand improvement. This audit was focused on the Southwest and Ozark regions.

Multi-Site Requirements

MDC maintains a multi-site certification consisting of eight regions. Headquarters of the management system is in Jefferson City, Missouri. The agency qualifies for multi-site sampling since the management system is controlled and directed by the central office. The SFI manager operates an internal audit program that is one upon which Bureau Veritas Certification can place a high degree of reliance to ensure continued conformance with the SFI standard. Regions are responsible for developing corrective actions and reporting to the central office.

Two regions are required to be audited during each surveillance.

Sites	Sites Audited During this Event
Jefferson City	X
Northeast Region	
Southeast Region	
Ozark Region	X
St. Louis Region	
Central Region	
Southwest Region	X
Kansas City Region	
Northwest Region	

Audit Results

The document review was conducted to determine if MDC’s system documentation continues to meet the requirements of the SFI 2015-2019 Standard Forest Management Edition. The central office audit also examined the company’s procedures for meeting multi-site requirements. The field audit consisted of a review of seven harvesting operations, each on a different conservation area. Two of the sites were active at the time of the audit. The logger was interviewed to determine training, spill response, rutting guidelines, and acceptable damage to the residual stand.

Objective 1-Forest Management Planning:

MDC continues to operate a stand-level inventory system. The agency uses a continuous forest inventory (CFI) system to provide information on growth and yield. CFI plots are remeasured every 5 years. The agency uses the area control method to schedule harvests. The agency is aware of potential impact of climate change on forest inventory. MDC has a GIS in place, including soils information. The agency has an ecological land classification system. No significant changes have occurred in the past year.

MDC does not have income or harvesting targets. It conducts timber harvests to enhance forest health and provide wildlife habitat. Timber removal for 2020 was less than 2019, once again well

less than 1% of the estimated 2.9 billion bd. ft across its ownership. Estimated growth is 3%, so the agency is harvesting much less than growth. MDC only conducts conversions to achieve restoration objectives. The agency does not convert land to non-forest uses.

Objective 2-Forest Health and Productivity:

Specific treatments for each stand, including regeneration and intermediate harvests, are identified during compartment inventory and analysis. All harvest sites observed during the audit were partial harvests, with the intention of improving stand health and facilitating regeneration. One harvest was a salvage of blown-down timber from a wind storm last year. Regeneration is evaluated during forest inventory processes. Natural regeneration is usually not a problem, but if less than 100 desirable TPA are present after 15-20 years, additional silvicultural treatments may be used. MDC does an excellent job of monitoring and diligently managing its forest to prevent impacts from pests.

MDC generally only uses herbicides for the treatment of invasive species and to conduct timber stand improvement. Employees responsible for herbicide applications work under someone who is properly licensed. No herbicide use was observed during this audit. The agency does not use any WHO Type 1A or 1B pesticides, nor does it use any banned under the Stockholm Convention.

Soil productivity was very well protected in all resource units. No rutting or soil compaction was observed during the audit. Foresters and logging contractors were very consistent in their responses to acceptable rutting guidelines, which are spelled out in the Missouri Watershed Protection Practice document and included in logging contracts.

MDC land for the most part is dominated by mature and over-mature forests that results in most harvests being done to remove dead and dying trees. Has it has been noted in the past, and will be noted again during this audit, the agency still has room to accelerate its harvesting activities to create more forest diversity and improve forest health. This would also have a side benefit of improving wildlife habitat for those species needing early successional forests, which is generally lacking across the ownership.

Objective 3-Protection and Maintenance of Water Resources:

Compliance with the Missouri Watershed Protection Practice (BMP) was evident on all seven harvest sites reviewed during the audit. Streamside management zones were very well established, generally wider than required, and included protection of ephemeral streams (termed order 1 streams), which is not required by the Missouri Watershed Protection Practice guidelines. Erosion control measures were in place on roads and skid trails. Timber harvests are monitored for BMP compliance, with results recorded on an inspection form. No stream crossings were observed during this audit. The agency makes a concerted effort to design sale areas to eliminate the need for stream crossings. Logging contracts contain a requirement for compliance to BMPs.

Objective 4-Conservation of Biological Diversity:

MDC continues to operate a robust wildlife management and biodiversity program, given its focus is on enhancing wildlife habitat. Input from the natural heritage program is obtained for every timber sale, providing known locations and appropriate management practices. Harvest timing restrictions are in place on most sales due to the potential presence of federally listed bat species. The agency considers all G and S ranked species, in addition to T&E species. MDC uses the state wildlife action plan to determine priority species to incorporate into its forest management plans. The agency uses its ecological land classification system to document forest cover types.

MDC's cooperative effort to restore populations of the brown headed nuthatch to Missouri is a commendable effort to conserve native biodiversity. This effort to restore a G4 species was considered to be a notable practice.

Stand-level wildlife habitat elements were evident on all partial harvests reviewed during the audit. There was an obvious attempt to retain snags and legacy trees, even marking snags on units that were marked to leave, making sure the logger retained the snags. MDC is quite focused on the conservation of bat species, thus the effort to retain snags, which also benefits a myriad of other species. The agency has a policy to retain at least 10% of its land in old-growth or old-growth potential stands. MDC does a good job of using prescribed fire to enhance wildlife habitat and control invasive species.

Missouri has a number of non-native invasive species. MDC is quite active in identifying and treating any significant occurrences of non-native invasive species. Employees were well aware of invasive species that could occur in their area of operations. Most are treated either through prescribed burning or limited use of herbicides. The agency is still trapping feral hogs, an effort they received a notable practice for last year.

MDC has a division devoted to conducting biodiversity related research. Results are incorporated into area management plans and communicated through training.

Objective 5-Management of Visual Quality and Recreational Benefits:

One of the primary focuses of MDC is on aesthetics, so it has a very robust aesthetic management program. The primary way of addressing aesthetics is to slash logging debris to within 24 inches of the ground within defined distances depending on type of road. This includes haul roads, as these are used by the public. The manner in which the agency manages its forest also contributes quite well to visual quality. The average clearcut size for the few clear-cuts conducted in 2020 was 14 acres. What few clear-cuts the agency conducts have a considerable amount of standing retention. MDC has a policy to not clear-cut next to a stand unless the adjoining stand is at least 10 feet in height or 50% canopy cover, which takes longer than three years in Missouri. The few clear-cuts observed in the past have all met the agency's green-up policy.

Objective 6-Protection of Special Sites:

MDC manages the natural heritage database, which includes information on cultural and historical resources. The potential presence of these resources is examined during activity planning processes

Objective 7-Efficient Use of Fiber Resources:

All harvest units observed during the audit demonstrated proper utilization, given all harvest activities were conducted in a hardwood ecosystem, which results in more residual material, and a poor pulpwood market in portions of MDC's ownership. Utilization is monitored during harvest activities, with results recorded on an inspection form.

Objective 8: Recognize and Respect Indigenous People's Rights:

MDC has a policy in place to respect the rights of indigenous peoples. No known federally recognized tribes exist in Missouri, but the agency has a process to respond to public inquiries.

Objective 9-Legal and Regulatory Compliance:

MDC's system to achieve compliance consists of contract language, pre-activity planning processes, training, and monitoring. Employees and contractors were well aware of spill reporting requirements, although they simply consist of only responding to the Missouri reportable quantity, which is 50 gallons on land or any sheen on water. The agency's system to ensure regulatory compliance consists of contract language, pre-activity planning processes, training, and monitoring

MDC has a written policy in place to comply with social laws. The agency has received no communication from interested parties concerning it or its supplier's performance relative to ILO core conventions.

Objective 10-Forestry Research, Science and Technology:

MDC has a substantial Resource Science Division, responsible for coordinating and conducting research on a variety of forest and wildlife related topics. One of the most significant pieces of research is the Missouri Forest Ecosystem Project, which is taking a long-term look at the impact of logging on a variety of ecosystem functions. The agency is involved in a remote sensing project (MOTUS) for a number of migratory birds and bats to determine migration patterns. MDC contributes a considerable amount of money to research efforts, both internally and externally. The agency has developed growth and drain assessments and the economic impacts of its operations. MDC has access to information on the potential impacts of climate change on forest health and productivity, and wildlife and wildlife habitat.

Objective 11-Training and Education:

The agency has a statement of commitment to the SFI standard that is available to all employees on the MDC intranet. All new employees are required to receive SFI orientation training. Other training, such as BMPs, T&E species, aesthetics, etc. are conducted as needed. Training records in the past were well organized but were not as well organized this audit due to a recent reorganization. MDC was issued an opportunity for improvement to encourage the agency to improve its training record keeping. The agency requires loggers to have at least one person on each job who maintains current training status. MDC's written agreement with loggers contains a requirement for the use of qualified loggers. All loggers are required to have someone on each job who is either trained or a Master Certified logger in order to bid on an MDC sale, adding preference points if the buyer is a Master Certified logger. They must provide evidence of training at the time the contract is executed.

Objective 12-Community Involvement and Landowner Outreach:

There is no existing SIC in Missouri. Essentially, MDC is the Missouri SIC, since there are no other certified entities in the state as of yet. The agency has a landowner assistance program that provides a wealth of information to landowners, including the conservation of biological diversity and the protection of T&E and species of concern. MDC provides financial assistance to Forest Releaf of Missouri, which distributes free trees for planting, and the Forest and Woodland Association of Missouri, which promotes healthy, productive, and sustainable forests in the state. The Missouri Managed Woods program promotes the conservation of forestland. MDC is very involved in public outreach, this being another focus area of the agency.

Objective 13: Public Land Management Responsibilities:

The agency is required to get input from the public and adjoining landowners as part of its area planning process. This is a formal process, but also includes opportunities during public outreach efforts.

Objective 14-Communications and Public Reporting:

MDC's 3rd surveillance audit report as found on the SFI, Inc. website was required for public review. The agency submitted its 2020 SFI annual progress report prior to the March 31 deadline. MDC has the GIS and accomplishment (RAPTOR) capabilities to provide information to complete the report.

Objective 15-Management Review:

MDC has developed a system for collecting information to provide to management to evaluate the agency's conformance to the SFI standard. The agency conducts internal audits which it uses to judge its conformance and provides this information to management. MDC conducts a review of the progress towards achieving SFI objectives during monthly staff meetings and quarterly manager meetings.

Findings

Previous non-conformances:

No non-conformances were issued during the previous audit.

Non-conformances:

No non-conformances were issued during this audit.

Opportunities for Improvement:

One opportunity for improvement was issued. This should be considered in light of how it may affect conformance in the future.

1. PM 11.1, Ind 3: The agency had done a good job of keeping training records in the past, but recent organizational changes resulted in a gap in maintaining training records. It was apparent training has occurred, but MDC should improve its method for recording training records.

Notable Practices:

One notable practice was observed during the audit:

1. PM 4.1, Ind. 5: MDC's cooperative effort to restore populations of the brown headed nuthatch to Missouri is a commendable effort to conserve native biodiversity. The brown headed nuthatch is a G4 species but was extirpated in the early 1900s due to the harvest of pine and the subsequent establishment of hardwood due to a lack of fire. The nuthatch prefers relatively open pine forests with the presence of snags. This has been missing across much of the Missouri landscape. In cooperation with a number of state and federal agencies and NGOs, the birds have been reintroduced to suitable habitat. This will ultimately result in forest management decisions that recreate the native shortleaf pine habitat that used to exist across southern Missouri.

Logo/label use:

MDC is using the SFI logo on its website with approval from SFI, Inc. It does not intend to use the BVC logo.

SFI reporting:

The third surveillance audit report was found on the SFI, Inc. website as required for public review.

Review of Previous Audit Cycle

N/A

Conclusions

Since no non-conformances were issued, MDC was issued a recommendation for continued certification to the SFI 2015-2019 Standard Forest Management Edition.

SEE SF61 FOR AUDIT NOTES

Summary of Audit Findings:									
Audit Date(s):		From: Sept. 28, 2021				To: Sept. 30, 2021			
Number of SF02's Raised:			Major:		0		Minor:		0
Is a follow up visit required:		Yes		No	X	Date(s) of follow up visit:			
Follow-up visit remarks:									
Team Leader Recommendation:									
Corrective Action Plan(s) Accepted		Yes		No		N/A	X	Date:	
Proceed to/Continue Certification		Yes	X	No		N/A		Date:	9/30/2021
All NCR's Closed		Yes		No		N/A	X	Date:	
Standard audit conducted against:									
1)	SFIS 2015-2019 FM Edition			3)					
2)				4)					
Team Leader (1):		Team Members (2,3,4...)							
Richard Boitnott; CF, TX AF		2)							
		3)							
		4)							
		5)							
Scope of Supply: (scope statement must be verified and appear in the space below)									
Land management on Department of Conservation owned land in the state of Missouri									
Accreditation's		ANAB							
Number of Certificates		1							
Proposed Date for Next Audit Event									
Date	Sept 13-15, 2022								
Audit Report Distribution									
MDC : Marty Calvert-marty.calvert@mdc.mo.gov									
BVC: Lorisa love-lorisa.love@us.bureauveritas.com									

Clause	Audit Report
Opening Meeting	<p>Participants: Marty Calvert, Rich Blatz, Mike Morris, Justine Gartner, Pat Curtin, Angela George, Rhonda Rimer, Nick Burell, Andy Hubble</p> <ul style="list-style-type: none"> ➤ Scope of the audit <p>Discussions:</p> <ul style="list-style-type: none"> ➤ Audit schedule/plan ➤ Nonconformance types – Major / Minor ➤ Review of previous nonconformances – 0 ➤ Process approach to auditing and audit sampling ➤ Confidentiality agreement ➤ Termination of the audit ➤ Appeals process ➤ Closing meeting timing
Closing Meeting	<p>Participants: Marty Calvert, Rich Blatz, Angela George, Michael Bell, Mike Keely, Terry Thompson, Sarah Medlock, Justine Garner</p> <p>Discussions:</p> <ul style="list-style-type: none"> ➤ Introductions and appreciation for selecting Bureau Veritas Certification. ➤ Review of audit process - process approach and sampling. ➤ Review of OFIs and System Strengths ➤ Nonconformances – 0 ➤ Date for next audit. ➤ Reporting protocol and timing