



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

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PQC Code	E01E
Contract Number	US 2736092

Certification Audit:	X	Re-Certification Audit:		Surveillance Audit:		#	Scope extension audit:	
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Audit Summary
<p align="center"><b>Introduction</b></p> <p>This report summarizes the results of the initial audit conducted on the Missouri Department of Conservation’s (MDC’s) SFI program for forest management. The audit was conducted by Mr. Richard Boitnott and Mr. Rick Larkin. Mr. Richard Boitnott served as the lead auditor throughout the audit process, and is an SAF certified forester, a Texas accredited forester, and has wildlife management expertise. Mr. Larkin is a certified wildlife biologist and an EMS lead auditor.</p> <p align="center"><b>Audit Scope, Objectives and Process</b></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"><b>Audit Plan</b></p> <p>The stage 1 audit was conducted for one day at the Jefferson City Missouri office on June 15<sup>th</sup>, 2017. The stage 2 field audit was conducted by two auditors for three days each September 5<sup>th</sup> through the 7<sup>th</sup>. A closing meeting was conducted at the end of the day on the 7<sup>th</sup>. An audit plan was developed and is on file with Bureau Veritas Certification</p> <p align="center"><b>Company Information</b></p> <p>The Missouri Conservation Department is a public entity tasked with restoring, conserving, and regulating Missouri’s fisheries, forests, and wildlife. The department manages more than 975,000 acres of land in the state, of which approximately 630,000 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</p>

bottomland forest. 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.

### **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 across all regions, although the lack of documentation resulted in the issuance of a non-conformance during stage 1. Regions are responsible for developing corrective actions and reporting to the central office. The internal audit program is now one upon which Bureau Veritas Certification can place a high degree of reliance to ensure continued conformance with the SFI standard.

Regions covered during the audit were selected based on square root of the number of sites rounded up to the next highest number, focusing on two of the regions that conduct the most harvesting activities.

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

### **Audit Results**

The stage 1 audit was conducted to determine if MDC’s system documentation met 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 16 select harvesting operations and five special sites. Two of the harvest sites were active at the time of the audit. The auditors interviewed loggers to discuss training, BMP compliance, and spill response.

#### **Objective 1-Forest Management Planning:**

MDC has developed a continuous inventory system to track forest inventory. The agency uses the area control method to schedule harvests. MDC is using FVS for its growth and yield, while feeding data from the CFI. 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.

MDC does not have income or harvesting targets. It conducts timber harvest to enhance forest health and provide wildlife habitat. The average timber removal from 2005-2016 has been 14,146,946 bd. ft. This is well below growth, which is estimated at 3% average. Total estimated on the stump is 2.6 billion bd. ft. MDC only conducts conversions to achieve restoration objectives. It has not defined

what it considers to be a conversion, and has not explicitly defined the process for making sure it meets the requirements of PM 1.2. An opportunity for improvement was issued. 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. Reforestation after final harvests is through natural regeneration, with the exception of some native plantings or seeding on sites following silvicultural recommendations and compatible with the appropriate ecological classification. 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. No herbicide use was observed during the 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 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.

#### Objective 3-Protection and Maintenance of Water Resources:

Compliance with the Missouri Watershed Protection Practice (BMP) was evident on all harvest sites reviewed during the audit, with the exception of one harvest area. Logging slash was left in an intermittent stream, which is not accordance to the Missouri Watershed Protection Practice document. In addition, there was no note of this infraction in the inspection forms. A non-conformance was issued due to this deficiency in the agency's program to implement BMPs and in their inspection process. Other than this isolated instance, streamside management zones were very well established, generally wider than required. Erosion control measures were in place on roads and skid trails. Logging contracts contain a requirement for compliance to BMPs. No stream crossings were observed during the audit. Interviews with employees indicated MDC designs timber sales so as not to not cross stream courses.

#### Objective 4-Conservation of Biological Diversity:

MDC operates 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. 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.

Stand-level wildlife habitat elements were evident on partial harvests reviewed during the audit. There was an obvious attempt to retain snags and legacy trees, even though MDC does not typically conduct clearcutting. The agency has a policy to retain at least 10% of its land in old-growth or old-growth potential stands. MDC uses prescribed fire for wildlife habitat enhancements. One glade was observed during the audit where prescribed fire is used to ensure eastern red cedar does not encroach into the glade.

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. The only use of herbicides is for the treatment of invasive species.

MDC has a division devoted to conducting 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 lop 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 clearcuts conducted in 2016 was 31 acres. MDC has a policy to not clearcut 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 only harvests observed during the audit were select cuts, so no violation of the agency's green-up policy was observed.

#### 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, although it did not at the time of the stage 1 audit. This resulted in the issuance of a non-conformance that was closed prior to stage 2. 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. Interviews conducted with both employees and logging contractors demonstrated a general lack of knowledge of quantities of spilled petroleum fluid that are reportable to DNR. This was particularly notable in the lack of knowledge of the amount of petroleum fluid allowed in water. A non-conformance was issued due to the potential violation of a regulatory requirement because of this lack of awareness.

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 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 employees are required to receive SFI orientation training. Other training, such as BMPs, T&E species, aesthetics, etc. are conducted as needed. Training records verified training has occurred as required by the agency's procedures. MDC employees receive a great deal of training. 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. The logger training program contains all the requirements of 11.2.1, with the exception of invasive species, aesthetics, special sites, endangered species act. These items are implicitly covered by providing a pocket guide to Missouri Forest Management Guidelines, but it could be more explicitly covered during training sessions.

#### Objective 12-Community Involvement and Landowner Outreach:

There is no existing SIC in Missouri. Essentially, MDC is the Missouri SIC. 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 Relief 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 managed wood 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.

#### Objective 14-Communications and Public Reporting:

Since this is the agency's initial audit, it has not yet provided an audit report to SFI, Inc. or completed an annual progress report. However, it has the GIS and accomplishment (RAPTOR) capabilities to provide information to complete the report.

#### Objective 15-Management Review:

MDC has developed a system to collecting information, but it could better articulate the system. The agency conducts a review of the progress towards achieving SFI objectives during monthly staff meetings and quarterly manager meetings.

### **Findings**

**Previous non-conformances:**

Two minor non-conformances were issued during stage 1. Corrective actions were properly implemented prior to stage 2.

**Non-conformances:**

Two minor non-conformances were issued during stage 2; one against MDC's program for implementing BMPs and monitoring BMP compliance, and another against the agency's system for achieving regulatory compliance. All SF02 non-conformance reports, including those from stage 1, are shown below.

**Opportunities for Improvement:**

Three opportunities for improvement were issued, all during stage 1:

1. PM 1.2, Inds. 1,2: The organization only conducts conversions to achieve restoration objectives. It has not defined what it considers to be a conversion, and has not explicitly defined the process for making sure it meets the requirements of indicators 1.2.1 and 1.2.2.
2. PM 11.2, Ind 1: The logger training program contains all the requirements, with the exception of invasive species, aesthetics, special sites, endangered species act. These items are implicitly covered by providing a pocket guide to Missouri Forest Management Guidelines, but it could be more explicitly covered during training sessions.
3. PM 15.1, Ind. 2: The organization has developed a system for collecting information for management review, but it could better describe the system in its procedure document.

**Notable Practices:**

One notable practice was observed during the audit:

1. PM 11.1, Ind. 4: MDC conducts pre-harvest meetings with every member of each logging crew. MDC contracts are quite complicated, involving a number of different silvicultural treatments across the sale area, various wildlife restrictions (e.g northern long-eared bat and Indiana bat), and aesthetic and BMP requirements. This makes sure everyone on the crew is on the same page, ensuring effective implementation of silvicultural treatments, and the protection of valuable resources.

**Logo/label use:**

MDC has not yet used the SFI logo, but may do so, and knows to contact SFI to obtain approval before doing so. It does not intend to use the BVC logo.

**SFI reporting:**

This is MDC's initial audit, so no audit reports have yet been submitted.

**Review of Previous Audit Cycle**

N/A

**Conclusions**

MDC was issued two minor non-conformances during stage 1, which were closed prior to stage 2. Two additional minor non-conformances were issued during stage 2. These must be closed prior to issuance of a certificate. Evidence of corrective actions should be sent to [lilianna.ramirez@us.bureauveritas.com](mailto:lilianna.ramirez@us.bureauveritas.com) within 90 days of the closing meeting.

**Followup**

MDC presented evidence of effective implementation of the corrective actions on 9/19/2017. The non-conformances were closed, and the agency recommended for certification to the SFI 2015-2019 FM Standard.

**SEE SF61s FOR AUDIT NOTES**

<b>Summary of Audit Findings:</b>									
Audit Date(s):		From: June 15, 2017 (Jeff City) Sept. 5, 2017				To: June 15, 2017 (Jeff City) Sept. 7, 2017			
Number of SF02's Raised:			Major:		0		Minor:		4
Is a follow up visit required:		Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Date(s) of follow up visit:			
Follow-up visit remarks:									
<b>Team Leader Recommendation:</b>									
Corrective Action Plan(s) Accepted		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	Date:	9/19/2017
Proceed to/Continue Certification		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	Date:	9/19/2017
All NCR's Closed		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	Date:	9/19/2017
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) Rick Larkin; CWB, EMS (LA)							
		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. 4-7, 2017								
Audit Report Distribution									
MDC : Marty Calvert-marty.calvert@mdc.mo.gov									
BVC: Amanda Lujan-amanda.lujan@us.bureauveritas.com									
BVC: Lilianna Ramirez-lilianna/ramirez@us.bureauveritas.com									

Clause	Audit Report
Opening Meeting	<p>Participants: Lisa Allen, John Tuttle, Sarah Medlock, Larry Rienken, Nick Zaczek, Danielle Stephenson, Marty Calvert, Rich Blatz, Gus Raeker, Cathy deJong, Renhard Wesselxchmidt, John Vogel, matt Pilz, Rocky Hayes, Justin Gartner, Micheal Bill, Chad Smith, Mike Schroer, Joel Porath</p> <p>Discussions:</p> <ul style="list-style-type: none"> <li>➤ Introductions</li> <li>➤ Scope of the audit</li> <li>➤ Audit schedule/plan</li> <li>➤ Nonconformance types – Major / Minor</li> <li>➤ Review of previous nonconformances – 2 (stage 1).</li> <li>➤ Process approach to auditing and audit sampling</li> <li>➤ Confidentiality agreement</li> <li>➤ Termination of the audit</li> <li>➤ Appeals process</li> <li>➤ Closing meeting timing</li> </ul>
Closing Meeting	<p>Participants: Sarah Medlock, Mike Smith, Larry Rieken, Lee Hughes, Marty Calvert, Rich Blatz, Micheal Bill, Justine Gardner, Krista Noel, Yvette Amerman, Chad Smith, Ryan Jones, Lisa Allen</p> <p>Discussions:</p> <ul style="list-style-type: none"> <li>➤ Introductions and appreciation for selecting Bureau Veritas Certification.</li> <li>➤ Review of audit process - process approach and sampling.</li> <li>➤ Review of OFIs and System Strengths</li> <li>➤ Nonconformances – 2 (stage 2)</li> <li>➤ Date for next audit.</li> <li>➤ Reporting protocol and timing</li> </ul>





## SF02/NA NONCONFORMITY REPORT

<b>Company Name and Site:</b>		<b>SF02#:</b> SF02-01	
Contract #:	Type of audit (e.g., initial, surveillance):	Team Leader:	
US2736092	Stage 1	Richard Boitnott	
Date:	Standard and Clause #:	Team Member:	
6/15/2017	SFIS Ind. 8.1.1		
Major	Minor	Other Documents (if applicable):	Company Representative:
	X		Marty Calvert
<b>REQUIREMENT OF AUDITED STANDARD:</b>			
Indicator 8.1.1 requires Program Participants to have a written policy acknowledging a commitment to recognize and respect the rights of indigenous peoples			
<b>OBSERVED NONCONFORMITY:</b>			
There was no evidence observed the organization has a written policy to acknowledge the rights of indigenous peoples.			
<b>ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION PLAN</b> (To be completed by the Company. Plan to be submitted in 30 days)			
Corrective Action Plan Date:	6/16/2017	Company Representative:	Marty Calvert
Root Cause Analysis and Corrective Action			
<b>Root Cause:</b> MDC had a misconception that they did not need a written policy acknowledging commitment to indigenous people's rights because there are no federally recognized tribes within the State. <b>Corrective Action Plan:</b> A written policy statement acknowledging commitment to indigenous people's rights has been provided to Lisa Allen, State Forester, for review.			
<b>ROOT CAUSE AND CORRECTIVE ACTION PLAN ACCEPTANCE REPORT</b> (To be completed by Bureau Veritas Certification – Verify effective identification of Root Cause and acceptance of Corrective Action Plan)			
Root Cause: Acceptable. Common misunderstanding Corrective Action Plan: Acceptable			
Plan Accepted:	Yes	X	No
Auditor:		Richard Boitnott	Date: 7/13/2017
<b>CORRECTIVE ACTION IMPLEMENTATION</b>			
To be completed by Company – Provide objective evidence. Not to exceed: 90 Days <input type="checkbox"/> 1 Year <input checked="" type="checkbox"/>			
Corrective Action Completion Date:		Company Representative:	Marty Calvert
<b>Corrective Action Implementation:</b> A written policy statement acknowledging commitment to indigenous people's rights has been accepted by Lisa Allen, State Forester, and posted in the MDC SFI Manual which is available to all MDC employees. <b>Method used to verify effectiveness of action taken:</b> Written policy was reviewed and accepted by Lisa Allen, State Forester, and posted in the MDC SFI Manual.			
<b>CORRECTIVE ACTION IMPLEMENTATION ACCEPTANCE REPORT</b> (To be completed by Bureau Veritas Certification – Acceptance of Corrective Action taken)			
Accepted:	Yes	X	No
Nonconformance Closed:		Yes	X
Follow Up Comments:			
Auditor:	Richard Boitnott		Date: 7/13/2017




### SF02/NA NONCONFORMITY REPORT

Company Name and Site:		SF02#:	
		SF02-02	
Contract #:	Type of audit (e.g., initial, surveillance):	Team Leader:	
US2736092	Stage 1	Richard Boitnott	
Date:	Standard and Clause #:	Team Member:	
6/15/2017	SFIS Section 9, Appendix 1		
Major	Minor	Other Documents (if applicable):	Company Representative:
	X		Marty Calvert
<b>REQUIREMENT OF AUDITED STANDARD:</b>			
SFIS Section 9, Appendix 1, item d requires the organization to demonstrate its ability to collect and analyze data, including internal audit planning and evaluation of the results, in order to qualify for multi-site sampling			
<b>OBSERVED NONCONFORMITY:</b>			
While MDC has apparently conducted internal audits, it has not documented the results: Therefore, the lead auditor could not determine the effectiveness of the internal audit program.			
<b>ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION PLAN</b> (To be completed by the Company. Plan to be submitted in 30 days)			
Corrective Action Plan Date:	6/20/2017	Company Representative:	Marty Calvert
<b>Root Cause Analysis and Corrective Action</b>			
<b>Root Cause:</b> MDC did not prepare a written internal audit report prior to the Stage 1 Audit. We were not aware we were to be considered a multi-site certification, and thus did not prepare an internal audit report.			
<b>Corrective Action Plan:</b> In preparation for the SFI Audit, MDC had conducted audits' in order to alleviate any trepidation from the field staff about the audit process and to verify readiness. The audits were conducted in all 8 Regions. Rich Blatz and Marty Calvert, lead the audits.			
MDC also has an internal auditor. The mission of the Internal Auditor is to provide independent, objective assurance and consulting services designed to add value and improve the Department's operations. The Internal Auditor helps the Department accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, accountability, control, and governance processes.			
-These audit results and past audit findings from the Departments internal auditor will be prepared and made available to the Richard Boitnott, Lead Auditor.			
Furthermore, MDC will prepare an internal audit schedule, with a sampling intensity mirroring that of the SFIS Section 9, Appendix 1, item 5.1.2 Multi-Site Sampling Alternative Approaches.			
The results of these audit findings will be presented at the monthly Division Management Team (DMT) Meetings with Program Supervisors, and the quarterly Division Leadership Team (DLT) Meetings, which includes the DMT, Program Supervisors and Regional Foresters. The meeting's minutes will serve as evidence of discussion, and the meeting's "Action Items" will show results.			
<b>ROOT CAUSE AND CORRECTIVE ACTION PLAN ACCEPTANCE REPORT</b> (To be completed by Bureau Veritas Certification – Verify effective identification of Root Cause and acceptance of Corrective Action Plan)			
Root Cause: Acceptable			
Corrective Action Plan: Acceptable			
Plan Accepted:	Yes	X	No
Comments:			
Auditor:	Richard Boitnott	Date:	7/13/2017
<b>CORRECTIVE ACTION IMPLEMENTATION</b>			
To be completed by Company – Provide objective evidence. Not to exceed: 90 Days <input checked="" type="checkbox"/> 1 Year <input type="checkbox"/>			
Corrective Action Completion Date:	6/20/2017	Company Representative:	Marty Calvert


**Corrective Action Implementation:** Written audit report and internal audit plan provided to Richard Boitnott, Lead Auditor. The written audit report is being provided in a separate document. The internal audit plan is listed below.

**Method used to verify effectiveness of action taken:** Marty Calvert will insure sufficient time is allotted on DMT and DLT agendas to report all internal audit results and that action items are handled in a timely manner by the appropriate supervisors.

<b>CORRECTIVE ACTION IMPLEMENTATION ACCEPTANCE REPORT</b>									
(To be completed by Bureau Veritas Certification – Acceptance of Corrective Action taken)									
Accepted:	Yes	X	No		Nonconformance Closed:	Yes	X	No	
Follow Up Comments:									
Auditor:	Richard Boitnott				Date:	7/13/2017			

	<b>SF02/NA NONCONFORMITY REPORT</b>		
Company Name and Site:		<u>SF02#:</u>	
		SF02-03	
Contract #:	Type of audit (e.g., initial, surveillance):	Team Leader:	
US2736092	Stage 2	Richard Boitnott	
Date:	Standard and Clause #:	Team Member:	
9/7/2017	SFIS Ind. 3.1.1, 3.1.3		
Major	Minor	Other Documents (if applicable):	Company Representative:
	X		Marty Calvert
<b>REQUIREMENT OF AUDITED STANDARD:</b>			
Indicator 3.1.1 requires Program Participants to implement federal, state or provincial best management practices during all phases of management activities, while 3.1.3 requires the company to monitor BMP compliance.			
<b>OBSERVED NONCONFORMITY:</b>			
One harvest unit observed during the audit had logging slash in an intermittent stream. There was no indication of this deficiency on the inspection form			
<b>ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION PLAN</b>			
(To be completed by the Company. Plan to be submitted in 30 days)			
Corrective Action Plan Date:		Company Representative:	Marty Calvert
Root Cause Analysis and Corrective Action			
<p><b>Root Cause:</b> The Timber Sale Administrator, on the one harvest unit, did not recognize the drainage as an intermittent stream. While it was a blue line stream on the map, he did not consider it to be an intermittent. As such, he was not concerned about tops in the stream course, as that is not a requirement of the Missouri Watershed Protection Practice.</p> <p><b>Corrective Action Plan:</b></p> <ul style="list-style-type: none"> <li>• The logger is currently on the Conservation Area, actively harvesting on another cutting block. He will be instructed to pull the top from the intermittent stream and repair any water bars damaged by the return trip.</li> <li>• The Forest District Supervisor will remind the Work Team, responsible for Conservation Area, about the SMZ requirements as outlined in the 2014 Missouri Watershed Protection Practice booklet.</li> </ul>			
<b>ROOT CAUSE AND CORRECTIVE ACTION PLAN ACCEPTANCE REPORT</b>			
(To be completed by Bureau Veritas Certification – Verify effective identification of Root Cause and acceptance of Corrective Action Plan)			

Root Cause: Acceptable. Corrective Action Plan: Acceptable									
Plan Accepted:	Yes	X	No		Comments:				
Auditor:	Richard Boitnott				Date:	9/19/2017			
<b>CORRECTIVE ACTION IMPLEMENTATION</b>									
To be completed by Company – Provide objective evidence. Not to exceed: 90 Days <input checked="" type="checkbox"/> 1 Year <input type="checkbox"/>									
Corrective Action Completion Date:				Company Representative:	Marty Calvert				
<b>Corrective Action Implementation:</b> The Forest District Supervisor reviewed the SMZ requirements, as outlined in the 2014 Missouri Watershed Protection Practice booklet, with the Work Team. The Forest District Supervisor sent an email to the Forest Certification Manager advising the corrective action plan has been completed. This was forwarded to the Lead Auditor.									
<b>Method used to verify effectiveness of action taken:</b> During the next internal audit, each site visited will demonstrate their understanding of the SMZ determination process. Also Regional and District Supervisors will be instructed to verify all SMZs were properly addressed during and after the sale.									
<b>CORRECTIVE ACTION IMPLEMENTATION ACCEPTANCE REPORT</b> (To be completed by Bureau Veritas Certification – Acceptance of Corrective Action taken)									
Accepted:	Yes	X	No		Nonconformance Closed:	Yes	X	No	
Follow Up Comments:									
Auditor:	Richard Boitnott				Date:	9/19/2017			

		<b>SF02/NA NONCONFORMITY REPORT</b>							
Company Name and Site:							<u>SF02#:</u>		
							SF02-04		
Contract #:		Type of audit (e.g., initial, surveillance):			Team Leader:				
US2736092		Stage 2			Richard Boitnott				
Date:		Standard and Clause #:			Team Member:				
9/7/2017		SFIS PM 9.1, Ind. 2							
Major	Minor	Other Documents (if applicable):			Company Representative:				
	X				Marty Calvert				
<b>REQUIREMENT OF AUDITED STANDARD:</b>									
SFIS PM 9.1 Ind. 2 requires the Program Participant to have a system to achieve compliance with applicable federal, provincial, state, or local laws and regulations.									
<b>OBSERVED NONCONFORMITY:</b>									
Interviews during the audit of both employees and logging contractors did not provide evidence of knowledge of the petroleum spill reporting requirements, particularly the need to report any amount of delivery to water.									
<b>ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION PLAN</b> (To be completed by the Company. Plan to be submitted in 30 days)									
Corrective Action Plan Date:	9/8/2017		Company Representative:			Marty Calvert			
<b>Root Cause Analysis and Corrective Action</b>									
<b>Root Cause:</b> Lack of knowledge of current MODNR petroleum spill reporting requirements. We have never trained on spill reporting requirements.									
<b>Corrective Action Plan:</b> Provide Division Administrators, Unit Chiefs, and Regional Supervisors with the MODNR petroleum spill reporting requirements with instructions to share it with their staff.									

ROOT CAUSE AND CORRECTIVE ACTION PLAN ACCEPTANCE REPORT									
(To be completed by Bureau Veritas Certification – Verify effective identification of Root Cause and acceptance of Corrective Action Plan)									
Root Cause: Acceptable									
Corrective Action Plan: Acceptable									
Plan Accepted:	Yes	X	No		Comments:				
Auditor:	Richard Boitnott				Date:	9/19/2017			
CORRECTIVE ACTION IMPLEMENTATION									
To be completed by Company – Provide objective evidence. Not to exceed: 90 Days <input checked="" type="checkbox"/> 1 Year <input type="checkbox"/>									
Corrective Action Completion Date:	9/8/2017		Company Representative:			Marty Calvert			
<p><b>Corrective Action Implementation:</b> Sent an email to Division Administrators, Unit Chiefs, and Regional Supervisors regarding the MODNR petroleum spill reporting requirements by attaching the <i>Missouri DNR Response to Small Fuel Spills, Hazardous Waste Program</i> fact sheet. Also the fact sheet has been added to the <b>MDC SFI Manual</b> located on the Forestry Division's SharePoint website.</p> <p><b>Method used to verify effectiveness of action taken:</b> During the next internal audit, each site visited will demonstrate their understanding of the MODNR petroleum spill reporting requirements.</p>									
CORRECTIVE ACTION IMPLEMENTATION ACCEPTANCE REPORT									
(To be completed by Bureau Veritas Certification – Acceptance of Corrective Action taken)									
Accepted:	Yes	X	No		Nonconformance Closed:	Yes	X	No	
Follow Up Comments:									
Auditor:	Richard Boitnott				Date:	9/19/2017			