

FOREST MANAGEMENT AND STUMP-TO-FOREST GATE CHAIN-OF-CUSTODY CERTIFICATION EVALUATION REPORT

Indiana Department of Natural Resources
Division of Forestry, Classified Forest & Wildlands Program
Indiana

SCS-FM/COC-000123N
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<http://www.in.gov/dnr/forestry/4801.htm>

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15 th March 2020	14 th March 2025

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Foreword

SCS Global Services (SCS) is a certification body accredited by the Forest Stewardship Council to conduct forest management and chain of custody evaluations. Under the FSC / SCS certification system, forest management enterprises (FMEs) meeting international standards of forest stewardship can be certified as “well managed,” thereby permitting the FME’s use of the FSC endorsement and logo in the marketplace subject to regular FSC / SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts in forested regions all over the world to conduct evaluations of forest management. SCS evaluation teams collect and analyze written materials, conduct interviews with FME staff and key stakeholders, and complete field and office audits of subject forest management units (FMUs) as part of certification evaluations. Upon completion of the fact-finding phase of all evaluations, SCS teams determine conformance to the FSC Principles and Criteria.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (<http://info.fsc.org/>) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Certificate Registration Information

Name and Contact Information

Organization name	Indiana DNR Division of Forestry		
Contact person	Brenda Huter		
Address	402 W. Washington St., Room W296, Indianapolis, IN 46204 USA	Telephone	317-232-0142
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		e-mail	bhuter@dnr.in.gov
		Website	www.in.gov/dnr/forestry

FSC Sales Information

<input checked="" type="checkbox"/> FSC Sales contact information same as above.			
FSC salesperson			
Address		Telephone	
		Fax	
		e-mail	
		Website	

Scope of Certificate

Certificate Type	<input type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU	
	<input checked="" type="checkbox"/> Group		
SLIMF (if applicable)	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate	
	<input checked="" type="checkbox"/> Group SLIMF certificate		
# Group Members (if applicable)	7,150		
Number of FMUs in scope of certificate	9,577		
Geographic location of non-SLIMF FMU(s)	<i>Latitude & Longitude:</i>		
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate	
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical	
Total forest area in scope of certificate which is: Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac			
privately managed	481,814		
state managed			
community managed			
Number of FMUs in scope that are:			
less than 100 ha in area	9,425	100 - 1000 ha in area	152
1000 - 10 000 ha in area		more than 10 000 ha in area	

Total forest area in scope of certificate which is included in FMUs that:		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
are less than 100 ha in area	423,017	
are between 100 ha and 1000 ha in area	58,797	
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	481,814	
Division of FMUs into manageable units:		
Most FMUs are small enough in size that individual properties are not further divided into management units – some larger properties have stands delineated, with varying management and harvests planned by stand type.		

Non-SLIMF FMUs (Group or Multiple FMU Certificates)

Name	Contact information	Latitude/ longitude of Non-SLIMF FMUs
N/A		

Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
Male workers: 14	Female workers: 7	
Number of accidents in forest work since previous evaluation:	Serious: 0	Fatal: 0

Pesticide and Other Chemical Use

<input type="checkbox"/> FME does not use pesticides.				
Commercial name of pesticide / herbicide	Active ingredient	Quantity applied since previous evaluation (kg or lbs.)	Total area treated since previous evaluation (ha or ac)	Reason for use
2,4-D	2,4-D		4,088 ac	Invasive species control; grape vine control; TSI
Gordon’s Brush Killer, Triplet	2,4-D, 5merica. R-2-(2-methyl 4 chlorophenoxy) proponic acid		138 ac	Grape vine control; TSI
Pathway2,4-D; picloram				
730 acInvasive species control; grape vine control; TSI	2,4-D; triclopyr		4,570 ac	Invasive species control; grape vine control; TSI
Crossbow				

Milestone	aminopyralid		147 ac	Invasive species control
Stinger	aminopyralid, metsulfuron-methyl		5 ac	Invasive species control
Clethodim, Clethodim 2E	clethodim		42 ac	Invasive species control
Banvel	dicamba		0.5 ac	Invasive species control; grape vine control; TSI
Fusilade	fluazifop-P-butyl		200 ac	Invasive species control
Accord, Aquaneat, Conerstone, Gly Star, Rodeo, Roundup	Glyphosate		12,203 ac	Invasive species control; grape vine control; Tree planting; TSI
Habitat, Stalker	imazapyr		106 ac	Invasive species control; TSI
Escort	metsulfuron methyl			Invasive species control
Tordon	picloram		6,039 ac	Invasive species control; grape vine control, TSI
Pramtoil	prometon		2 ac	Invasive species control; grape vine control
Poast	sethoxydim		5 ac	Invasive Species Control
Princep, Simazine	simazine		48 ac	Invasive species control,

				grape vine control, tree planting, TSI
Spartan	sulfentrazone			Invasive species control
Oust	sulfometuron methyl		28 ac	Tree planting
Element, Garlon, Ortho Brush b Gone, Pathfinder, 7mericana 4	triclopyr		5,414	Invasive species control; grape vine control; TSI

Production Forests

Timber Forest Products	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	475,668
Area of production forest classified as 'plantation'	
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	475,668
Silvicultural system(s)	Area under type of management
Even-aged management	
Clearcut (clearcut size range)	10%
Shelterwood	
Other:	
Uneven-aged management	90%
Individual tree selection	
Group selection	
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
Species in scope of joint FM/COC certificate: (Scientific / Latin Name and Common / Trade Name)	

<i>Acer spp.</i>	Maple: sugar, red, black,silver, boxelder
<i>Aesculus spp.</i>	Ohio,yellow
<i>Ailanthus altissima</i>	Tree of heaven
<i>Asimina triloba</i>	Pawpaw
<i>Betula nigra</i>	River birch
<i>Carya spp.</i>	Hickory:bitternut,mockernut,shagbark, red, pignut, shellbark, pecan
<i>Carpinus caroliniana</i>	Hornbeam
<i>Catalpa 8merican</i>	Catalpa
<i>Celtis occidentalis</i>	Hackberry
<i>Cercis canadensis</i>	Eastern redbud
<i>Cladrastis kentukea</i>	Yellowwood
<i>Cornus florida</i>	Flowering dogwood
<i>Crataegus spp.</i>	Hawthorns
<i>Diospyros virginiana</i>	Persimmon
<i>Fagus grandifolia</i>	American beech
<i>Fraxinus spp.</i>	Ash: white, green, pumpkin, black, blue
<i>Gleditsia triacanthos</i>	Honey locust
<i>Gymnocladus dioica</i>	Kentucky coffee-tree
<i>Juglans spp.</i>	Black walnut, butternut
<i>Juniperus virginiana</i>	Red cedar
<i>Larix laricina</i>	Tamarack
<i>Liquidamber styraciflua</i>	Sweet gum
<i>Liriodendron tulipifera</i>	Yellow-poplar
<i>Maclura pomifera</i>	Osage orange
<i>Magnolia acuminata</i>	Cucumber magnolia
<i>Morus spp.</i>	Mulberry
<i>Nyssa sylvatica</i>	Black gum
<i>Ostrya virginiana</i>	Eastern hophornbeam (ironwood)
<i>Paulownia tomentosa</i>	Royal paulownia
<i>Picea abies</i>	Norway spruce
<i>Pinus spp.</i>	Pine: white, red, Scotch, Virginia, shortleaf, jack, loblolly
<i>Plantanus occidentalis</i>	Sycamore
<i>Populus spp.</i>	Large-toothed aspen, quaking aspen, cottonwood
<i>Prunus 8merican</i>	Black cherry
<i>Quercus spp.</i>	Oaks: white, red, black, scarlet, post, bur, swamp chestnut, swamp white, chestnut, chinkapin, shingle, black jack, cherry bark, pin, 8merica, overcup, northern pin
<i>Robinia pseudoacacia</i>	Black locust

<i>Salix nigra</i>	Black willow
<i>Sassafras albidum</i>	Sassafras
<i>Taxodium distichum</i>	Bald cypress
<i>Tilia 9mericana</i>	Basswood
<i>Tsuga canadensis</i>	Eastern hemlock
<i>Ulmus spp.</i>	Elms

FSC Product Classification

Timber products		
Product Level 1	Product Level 2	Species
W1 Rough Wood	W1.1 Roundwood	All
W1 Rough Wood	W1.2 Fuelwood	All
W3 Wood in chips or particles	W3.1 Wood chips	All
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
None		

Note: W1, W2, and W3 product groups usually do not require a separate evaluation to FSC-STD-40-004 (COC) if processing occurs in the field for FM/COC and CW/FM certificate types. N1-N10 (NTFPs) are eligible to be sold with FSC claims under FM/COC certification if reported here. Bamboo and NTFPs derived from trees (e.g. cork, resin, bark) may be eligible for FM/COC and CW/FM certification. NTFPs used for food and medicinal purposes are not eligible for CW/FM certification. Check with SCS if you have any products intended to be sold with an FSC claim outside of any of these categories.

Conservation and High Conservation Value Areas

Conservation Area	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total amount of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).*	6,146 ac designated nature preserves

**Note: Total conservation and HCV areas may differ since these may serve different functions in the FME's management system. Designation as HCV may allow for active management, including commercial harvest. Conservation areas are typically under passive management, but may undergo invasive species control, prescribed burns, non-commercial harvest, and other management activities intended to maintain or enhance their integrity. In all cases, figures are reported by the FME as it pertains local laws & regulations, management objectives, and FSC requirements.*

High Conservation Value Forest / Areas			Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Code	HCV Type	Description & Location	Area
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	State Nature Preserves located within group	6,146
HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.	Large block forests in ag dominated landscapes	43,597
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	S1, S2 communities across state. Old growth, and hemlock stands.	10,590
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
Total area of forest classified as 'High Conservation Value Forest / Area'			60,333

Areas Outside of the Scope of Certification (Partial Certification and Excision)

<input type="checkbox"/> <i>N/A – All forestland owned or managed by the applicant is included in the scope.</i>	
<input checked="" type="checkbox"/> <i>Applicant owns and/or manages other FMUs not under evaluation.</i>	
<input type="checkbox"/> <i>Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.</i>	
Note: <i>Excision cannot be applied to CW/FM certificates.</i>	
Explanation for exclusion of FMUs and/or excision:	Participants in the Classified Forests and Wildlands Program have the option to opt out of the certified group. Some percentage of landowners have opted out of the certification option and are not included in this scope.
Control measures to prevent mixing of certified and non-certified product (C8.3):	Those landowners who have opted out of the group may still conduct timber sales, but do not have access to the CoC information or certificate codes and cannot make certified sales. Sales and loads are not mixed between certified and non-certified landowners.
Description of FMUs excluded from or forested area excised from the scope of certification:	

Name of FMU or Stand	Location (city, state, country)	Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)
Uncertified Classified Acres (nonforested acres, private landowner declined certification or undecided)	Statewide	340,204

1.2 Standards Applicable

All standards employed are available on the websites of FSC International (www.fsc.org) or SCS Global Services (www.SCSglobalServices.com). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS' Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS' COC indicators for FMEs are based on the most current versions of the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements.

Standards applicable <i>NOTE: Please include the full standard name and Version number and check all that apply.</i>	<input checked="" type="checkbox"/> Forest Stewardship Standard(s), including version: FSC US Forest Management (2010)
	<input checked="" type="checkbox"/> SCS COC indicators for FMEs, V7-0
	<input checked="" type="checkbox"/> FSC Trademark Standard (FSC-STD-50-001 V2-0)
	<input checked="" type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	<input type="checkbox"/> Other:

1.3 Conversion Table English Units to Metric Units

Length Conversion Factors		
To convert from	To	multiply by
Mile (US Statute)	Kilometer (km)	1.609347
Foot (ft.)	Meter (m)	0.3048
Yard (yd.)	Meter (m)	0.9144
Area Conversion Factors		
To convert from	To	multiply by
Square foot (sq. ft.)	Square meter (m ²)	0.09290304
Acre (ac)	Hectare (ha)	0.4047
Volume Conversion Factors		
To convert from	To	multiply by
Cubic foot (cu ft.)	Cubic meter (m ³)	0.02831685
Gallon (gal)	Liter (l)	4.546
Quick reference		
1 acre	= 0.404686 ha	
1,000 acres	= 404.686 ha	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	

1 cubic foot	= 0.028317 cubic meters
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2. Description of Forest Management

2.1 Management Context

2.1.1 Regulatory Context

<p>Pertinent regulations at the national level</p>	<p>Endangered Species Act Clean Water Act (Section 404 wetland protection) Occupational Safety and Health Act National Historic Preservation Act Archaeological and Historic Preservation Act Americans with Disabilities Act U.S. ratified treaties, including CITES Lacey Act Forest Resources Conservation and Shortage Relief Act National Resource Protection Act National Environmental Protection Act National Wild and Scenic River Act Native American Grave Protection and Repatriation Act Rehabilitation Act Architectural Barriers Act</p>
<p>Pertinent regulations at the state/local level</p>	<p>IC 14-23-4-1 IC25-36.5-1-2 IC 14-32 IC 32-30 Watershed and County ordinances Classified Forest Act Indiana Flood Control Act Licensed Timber Buyers Law Counties: Blue River Commission (Harrison County) Crawford County (road hauling) Greene County (road hauling) Franklin County (selective cutting only in Whitewater River Scenic District) Martin County (road hauling) Monroe County (logging permit and road bond) Owen County (road hauling) Perry County (road hauling)</p>
<p>Regulatory context description</p>	<p>As excerpted from the Umbrella Management Plan, p.1 “In the early 1900’s, the majority of Indiana’s forests had been cleared for agriculture and to provide raw materials for a growing nation. The concern about the rate of deforestation and the erosion caused by</p>

	<p>abandoned agricultural fields led to the passage of the Indiana Forest Classification Act (IC 6-1.1-6) in 1921. This act created the Classified Forest Program. The objective of the program was to protect forests and watershed and promote reforestation by providing landowners a property tax incentive. In 1979 a sister program, the Classified Wildlife Habitat Program, focusing on habitats other than forests was created. In 2006, the two programs were merged into the Classified Forest & Wildlands Program. The statutory requirements of the joint program are contained in Indiana Code 6-1.1-6. The Indiana Administrative Code (312 IAC 15) contains rules that govern the management activity on enrolled parcels.”</p>
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2.1.2 Environmental Context

Environmental safeguards:
<p>Inspections of harvest operations during 2019 audit indicated that impacts are being avoided or minimized. A sample of ICF properties are inspected each year for BMP compliance.</p>
Management strategy for the identification and protection of rare, threatened and endangered (RTE) species and their habitats:
<p>Per DoF procedures, Natural Heritage database surveys are completed when preparing management plans and prior to a harvest. If the Natural Heritage database query indicates possible presence of forest dwelling RTE species, management occurs with the assumption that they are present. Auditors observed conformance with these requirements. Through interviews and file reviews, verified DF’s are using appropriate resources to determine habitat needs of RTE species when Natural Heritage hits come up. Many of the Natural Heritage hits are wetland plants that are outside of timber harvest areas.</p>

2.1.3 Socioeconomic Context

Excerpted from the Umbrella Management Plan, p.9.

“Pre-European settlement the area now known as the state of Indiana was over 85% forested. In 1800 there were 19.8 million of acres of forest; by 1920 the state’s forest cover had been reduced to 1.4 million acres. Land was cleared for agriculture, urban development, and to provide raw material for a growing nation.

Severe erosion and the threat of eradication of Indiana’s forest led to the passage of the Classified Forest law in 1921. The law created the Classified Forest Program which provides a property tax incentive for private landowners to protect their existing forests and to reforest cleared areas. As of

December 2011, the program, expanded into the Classified Forest and Wildlands Program, has over 681,500 acres enrolled.

The forest base of Indiana has recovered to over 4.75 million acres. Conversion, fragmentation, and forest pests are the current primary threats to Indiana’s forests.”

“Based on the Classified Forest & Wildland database (September 2009), the average forest parcel size in the ICFCG is approximately 50 acres. The minimum size is 10 acres (eligibility requirement) and the maximum forest tract is 2,134 acres,” (p.11).

2.1.4 Land use, Ownership, and Land Tenure

Excerpted from the Umbrella Management Plan, p.1

“The objectives of the Indiana Classified Forest and Wildlands Program are to encourage better woodland and wildlife stewardship, and protection of Indiana watersheds. Classified Forest and Wildlands must contain a minimum of 10 contiguous acres that support a growth of native or planted trees, native or planted grasslands, wetlands or other acceptable types of land cover. The land must be managed in accordance with a Division of Forestry approved management plan. In return enrolled lands have property tax assessment of \$1 per acre. The landowner does not relinquish control of classified areas, nor does the Division of Forestry become connected with ownership of the land. The program requires that the land be protected from development, livestock grazing, fires that are not part of a management plan, destructive timber harvesting practices and other activities that threaten natural resource sustainability.”

2.2 Forest Management Plan

Management objectives:
<p>The objective of the Indiana Classified Forests and Wildlands Program is to protect forests and watershed and promote reforestation by providing landowners a property tax incentive. The management objectives are to encourage better woodland and wildlife stewardship, and protection of Indiana watersheds.</p> <p>The objectives of the Indiana Classified Forests Certification Group (ICFCG) are broken out by topic:</p> <p>Ecological Objectives</p> <ul style="list-style-type: none"> • To retain and expand the native forests on the landscape • To protect and enhance biological diversity including rare, threatened and endangered species • To retain examples of ecological communities that are not protected on publicly owned properties <p>Social Objectives</p>

- To increase the group members’ and their communities’ knowledge of forests and the services they provide
- To retain the cultural, archaeological, and other socially significant sites on the landscape
- To identify forests with high conservation values and manage to maintain and enhance those values

Economic Objectives

- To retain and increase the economic value of ICFCG forests through forest management
- To provide revenue to group members through the sale of certified forest products
- To provide a source of certified wood for the Indiana wood based industries and to encourage the development of new markets for certified wood

To maintain the forest land base for the tourism and recreation industries

Forest composition and rationale for species selection:

A clear majority (70%) of the approximately 500,000 acres in the program are considered oak-hickory. The other forest types are listed below by percent:

- Maple-beech-birch: 14%
- Elm-ash-cottonwood: 7%
- Softwoods (white-red-jack pine; loblolly-shortleaf pine, other soft wood):4%
- Oak-pine: 3%
- Oak-gum cypress: 1%

Landowners typically select any hardwood species present that is mature and ready for harvest. The advance of Emerald Ash Borer is leading many participants to remove all merchantable ash from their properties, increasing the ash component selected.

General description of land management system(s):

As excerpted from the Umbrella Management Plan, p.14:

Silviculture in the Central Hardwood Region is less refined than other regions. This is due to the complexity of the species mix, the variety of sites, and the inconsistent results with some methods. The Indiana Classified Forest Certified Group lands are primarily managed under an uneven-aged system. This does not preclude management under an even-aged system when it meets the objectives of the Classified Forest & Wildlands Program and the group member. Group members typically desire the uneven-aged system’s relatively unbroken canopies that maintain their aesthetic appeal and visual continuity...

Regeneration methods under the uneven-age system are singletree selection and group selection... Even age methods include shelterwood removals and clearcuts. Intermediate methods include TSI via PCT or commercial thinning.

Harvest methods and equipment used:

As excerpted from the Umbrella Management Plan, p.18:

Below is a list of equipment commonly used on harvest sites in the ICFCG lands:

Felling

- Chainsaw: Hand held gas powered chainsaws are the most common felling tool used. Chainsaws are also used to top and buck the bole.
- Mechanical harvester/feller buncher: A motorized machine that grabs trees and then cuts them. Trees are stacked in piles to be moved to the yard. Use of mechanical harvesters is limited.

Landing/Skidding

- Rubber tire skidders: An articulated tractor like machine that uses a metal cable or grapple to drag logs from the stump to the log yard. The front of the skidder often has a blade. This is the most common piece of harvest equipment used on the ICFCG lands
- Forwarder: A tractor like machine with a grapple and storage bed. The forwarder picks up logs and puts them on the bed of the machine. The logs are then driven to the log landing and unloaded. Forwarders can have rubber tires or tracks. Use of forwarders reduces soil disturbance because the logs are not dragged to the landing. Use of forwarders reduces the number of trips to the log yard due to the large carrying capacity. Use of forwarders is uncommon.
- Animal teams: Occasionally animal teams, typically horses, are used to transport logs.

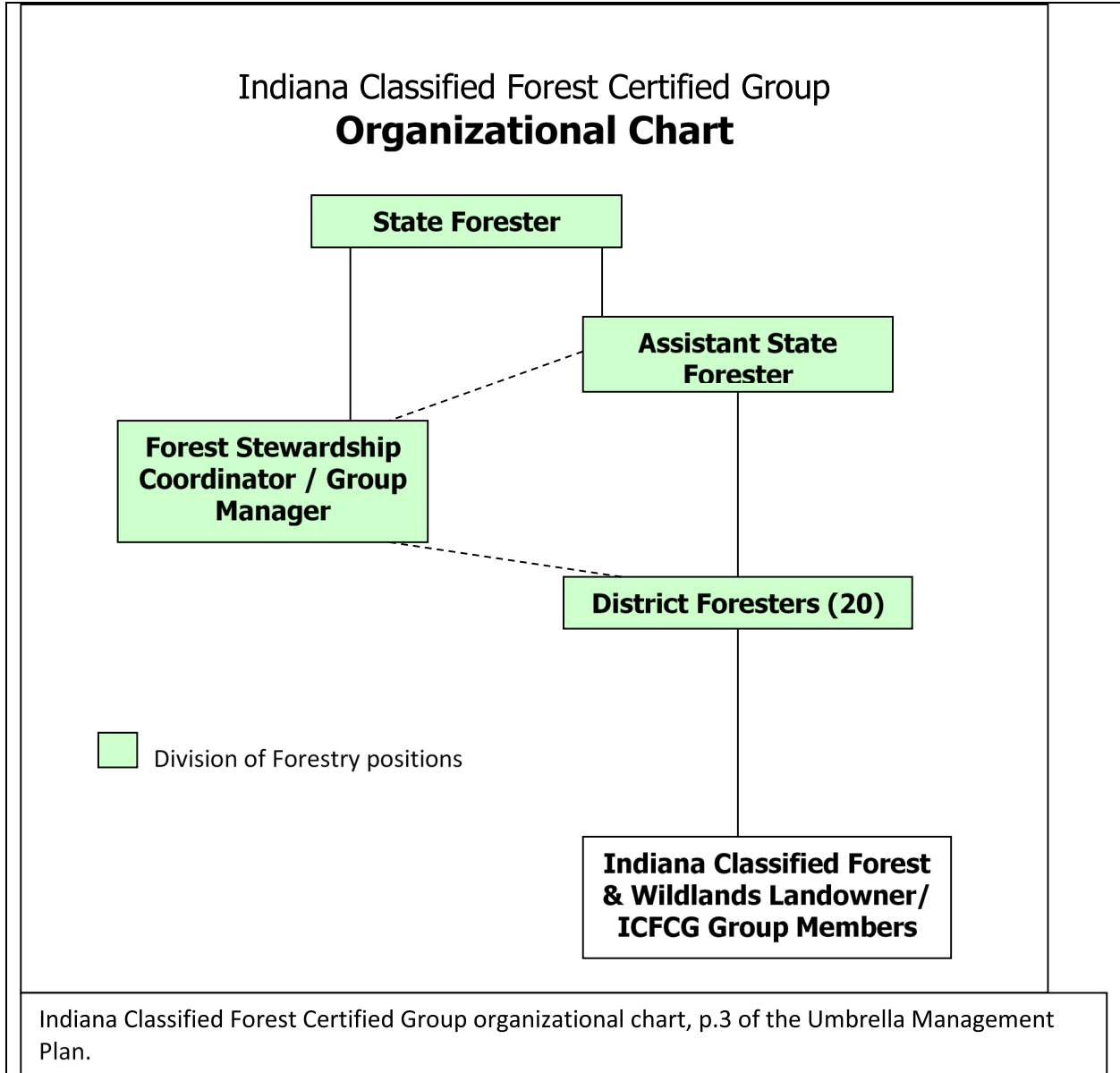
Bucking/Hauling

Bucking done in the yard is typically accomplished with a chainsaw or saw head attached to a boom. A boom is an articulated arm with grapple at the end. Booms are typically used to load logs on to trucks. The boom may be part of the log truck or may be an independent machine called a log loader.

Sale close out

At the end of the sale, installation of erosion control devices such as water bars and broad based dips and the repair of access and haul roads are often needed. This is frequently accomplished using the blade of the skidder or using a bulldozer.

Explanation of the management structures:



2.3 Monitoring System

Growth and yield of all forest products harvested:
<p>The DOF conducts an annual analysis of the most current 5 years of FIA data for the plots located on Classified Forest & Wildlands tracts. This analysis is supplemented with a Continuous Forest Inventory (CFI) being developed on ICFCG parcels, with similar protocols as those used for the state forest CFI program. Data will capture change in cover type, volume, volume removed, and stocking levels by species group. One-fifth of the plots will be measured each year.</p> <p>At the group member level, formal inventories are generally not conducted per parcel, and more qualitative assessments of inventory and growth and yield are done. Formal inventories are generally considered for properties >500ac.</p>
Forest dynamics and changes in composition of flora and fauna:

This data is generally captured through the qualitative assessments conducted annually on all parcels and through the CFI data collected as described above.
Environmental impacts:
A sample of 10% of harvest sites are monitored for BMP impacts annually. All harvest sites are subject to close-out inspections. DoF periodically monitors habitat conditions for all plants and animals as part of its periodic inventory of forest stand types and stocking levels. The location and status of invasive species is routinely monitored by field foresters. DoF works with the Division of Nature Preserves to monitor the condition of protected areas and set-asides.
Social impacts:
The Indiana Statewide Forest Assessment & Strategy has a rigorous process of stakeholder engagement in order to thoroughly assess the social impacts of forestry operations in the state and strategize for future forestry needs based on stakeholder feedback.
Costs, productivity, and efficiency:
Timber management activities on non-industrial properties are structured and monitored to ensure revenue is sufficient to pay for the logging costs and the consulting forester. Since harvests typically only occur every 15-20 years, there is little opportunity to assess productivity and efficiency of management on any regular basis. Land owners use simple cost-benefit calculations to determine efficiency of their overall management choices (i.e., enroll in Classified Forests and manage for timber products).

3. Certification Evaluation Process

3.1 Evaluation Schedule and Team

3.1.1 Evaluation Itinerary and Activities

Date: 21 st October 2019	
FMU / location / sites visited	Activities / notes
FME Central Office, Indianapolis	<p>Opening Meeting: Introductions, client update, review audit scope, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and tools review of open CARs/OBS, emergency and security procedures for evaluation team, final site selection.</p> <p>Discussion topics: Overall structure of Classified program; internal database houses annual reports, reinspection reports (every 5 to 7 years), pre- and post-harvest evaluations, among other information for each property enrolled; identification and protection of historic archeological resources on properties; role of cross-agency collaboration in implementing program; process for consulting with Native American tribes; GIS database layers such as RTE species, native plant preserves, and “blueline” streams; invasive and pests such as EAB, gypsy moth, spotted lantern fly, and kudzu; importance of federal cost-share programs for landowners in program such as EQIP, CSP, and CRP; and state and agency budgetary challenges.</p>

<p>Bear Wallow & Rattle Snake Ridge</p>	<p>22 acre harvest total. Landowner participates in the Forest Bank program with The Nature Conservancy (TNC). The TNC forester met auditors on site to explain TNC management practices. There were three prescriptions applied: single tree selection, shelterwood, regeneration openings (2 – 6 acres & 7 acres). Regeneration openings were used to reset an area that had been high-graded on the last entry (prior to the current owner). Buffer observed along ephemeral channel. Observed marked boundary for one of the openings.</p>
<p>Tract # 55-0053</p>	<p>Landowner included on Classified Forest & Wildlands Program Annual Report for 2018 that harvest had occurred on the property in 2018. Auditors walked a large portion of the property and found no evidence of harvest.</p>
<p>CRP planting, District 14 (Morgan County)</p>	<p>18-year old planting as part of the NRCS Conservation Reserve Program (CRP). Audit team interviewed landowner onsite. Landowner uses Round-Up and Tordon to control Japanese honeysuckle and other invasive species on his property. Landowner has created brush piles and planted oak (by sowing seeds collected from the state forest) in a prairie that he maintains through mowing 1/3 of the area each year. European black alder had been planted as trainer trees in the original CRP planting, a practice no longer used; the landowner has created snags from these and controls volunteer alder. He has 47 acres of woods behind his house and adjacent to the prairie; does not do any management in this forested area.</p>
<p>Date: 22nd October 2019</p>	
<p>FMU / location / sites visited</p>	<p>Activities / notes</p>
<p>Tract 23-0169, District 13 (Fountain County)</p>	<p>59-acre tract considered large block HCV (i.e., part of a contiguous forest block >740 acres in an agricultural landscape). Property enrolled in 2015 with improvement harvest later that year. TSI work conducted in last year focused on control of grapevine (cut followed by herbicide treatment). Coal Creek buffered. Functional boundary evident from old fencing and large trees. New law allows purple paint to signify boundary and as legal as ‘no trespassing’ signage; this property line is flagged. Very large white oak wolf tree observed on property boundary, providing good wildlife habitat. Informal survey of tree species onsite during the audit revealed a diversity of species, with over 15 species of trees and shrubs. Large culverted crossing of ephemeral stream showed no evidence of erosion. Auditor noted an old trailer and other trash; the DNR forester stated that he would require that it be removed, as properties in the program cannot contain trash. Near Coal Creek, there was evidence of historic shale pits or other earth-moving activities, as there were numerous old roads and excavated areas now grown over with trees. A more recent road crossing of a low area was constructed with logs and soil topped with gravel below a</p>

	historic shale pit had caused significant water to back up. A box turtle was seen onsite.
Tract 23-0146, District 13 (Fountain County)	Property adjacent to Coal Creek purchased in 1977 with 20 acres in the Classified Program. Creek is well buffered from forestry activities. Auditor interviewed landowner onsite. Individual walnut trees recently planted, protected by deer browse tubes. Small harvest (27 trees) in a shallow fen had been completed recently, as evidenced by stumps and tire tracts. Tract includes walnut stand planted by hand in 1990; landowner sprays Round-Up and Oust by hand annually in the grove to keep it parklike. The walnut is ready to be thinned. Eagle nest seen, and landowner protects any trees with bat habitat characteristics. Landowner harvests trees for his own use for his woodworking hobbies. Landowner has tallied 1,700 trees onsite including shagbark hickory, bur oak, shellbark hickory, shumard oak, swamp white oak, white oak, persimmon, river birch, tulip popular, and black walnut.
Tract 23-0173, District 13 (Fountain County)	Property enrolled in 2015 with harvested group openings in 2017. It was a relatively heavy cut, and no forester was involved. Species left included red and white oak. The DNR doesn't require that a forester be involved in harvests, but they encourage it and hand out a <i>Directory of Professional Foresters</i> (2019-20 version reviewed by auditor) to facilitate those contacts; the recommended use of a professional forester is also found in FMPs. Reinspection for the tract will occur in 2020, and the forester stated that he will recommend TSI. There is strong sycamore regeneration, which should be controlled. Ephemeral stream present and was not entered during the 2017 harvest; old car in stream area seen. A few residual trees showed significant debarking damage from skidding; while the health of the trees was not threatened, the debarking caused loss of timber quality.
Tract 23-0105, District 13 (Fountain County)	In the last year, grapevine was controlled and some ornamental trees planted. The landowner was onsite and interviewed by the auditor. Invasive species control is an ongoing activity, with weed whacking and spraying 2,4-D amine. 15 years ago, walnut had been harvested. Has planted pine and elm.
Tract 23-0117, District 13 (Fountain County)	Long and narrow tract following both sides of Coal Creek. Designated as large block HCV. The cut appeared to be light with some oak stumps observed. A few scattered tops, no residual damage observed. No cutting occurred in the riparian banks along the stream. 1854 historic Cades Mill Bridge well buffered from thinning.
Tract 23-0148, District 13 (Fountain County)	20-acre tract with timber harvest in 2000 and TSI in 2018. Landowner was onsite and auditor interviewed him. Culvert crossing installed in 2017 was well-constructed with significant riprap and tires holding the soil in place; no erosion seen.

	Tulip tree overstory, large white oak. Area has bald eagles and bobcats, according to landowner. Coal Creek well buffered from forestry activities. Landowner is using consulting forester.
Tract 23-0059, District 13 (Fountain County)	Landowner for Tract 23-0148 (above) also owns this property. It is a separate 800-acre parcel just down the road. Includes 2.5-acre pond with a surrounding manicured lawn. Most recent harvest of wooded area was in 2017, a large gap opening that had been cut. TSI followed in 2018. Back in 2000, the landowner had planted walnuts produced by Purdue University. Eagles nest onsite.
Tract 54-0029, District 13 (Montgomery County)	Landowner of property has 12 tracts in the Classified Program. This site includes 3 adjoining tracts. TSI for grapevine was reported for 2018, although the audit team was unable to find any evidence of such work. A number of invasive species were seen in the understory of an otherwise health stand: Japanese honeysuckle, bush honeysuckle, Chinese privet, autumn olive, and Asian bush honeysuckle.
Tract 54-0033, District 13 (Montgomery County)	According to DNR forester, this landowner has a “hands off” management style. The property is in the range of the American yew and bald eagle, both RTE species. It also is home to a southern disjunct population of eastern hemlock; there are only 3 places that this occurs in Indiana. Property was protected by a gate, no trespassing signs, and purple-painted property line. Main access road is well rocked with no sign of erosion. A new cabin has been built, which is excluded from the portion of the property that is in the Classified Program. The only recent activity was the removal of several large white oak, sugar maple, and ash around the cabin; these trees are not part of the program. ATV trails observed during site visit were well designed, contained water bars, and included a forded crossing of a flowing stream; the ford is quite rocky, so there is no threat of erosion. There were several trees along the trail that were marked with yellow, but it wasn’t clear if they were marked for harvest; there was sign of an old harvest (approx. 20 years ago), but nothing more recent. Observed a small pocket of eastern hemlock above Sugar Creek; no sign of harvesting around the hemlock. The tract had few invasive species, although the winged burning brush was observed, considered an emerging invasive in the region.
Tract 54-0061, District 13 (Montgomery County)	33-acre tract that has been in the program for a while with a 1933 classification date. The landowner focuses on a shelterwood system that involves (1) removing poor quality trees, (2) TSI and regular understory burns, and (3) removing overstory in about 5 to 10 years later. The landowner is an active board member of a local land trust, which burns a lot, too. The owner is open to using his property as a tool for public education and has conducted tours with the land trust, DNR, and Purdue University professors. Stand has been partially market for a timber harvest; harvest includes individual tree and group selections. Hilltop area that is marked for

	<p>the log yard has a lot of invasive species, which may be a risk for spreading with the activity around the landing. The landowner wants to maintain pine that had been planted years ago, so hardwoods will be removed around pine stand. Property boundary lines are well marked. Plan is to use a machine cutter and skidder. Estimated volume is 150k bd-ft. Many of the marked stems are of good quality; there should be no trouble generating volume.</p>
<p>Tract # 85-0060 District 2 & 12</p>	<p>18 acre tract. The District Forester (DF) found out that there had been harvest on the property when the Annual Report indicated so. DF followed up with a phone call to the landowner to verify that there had actually been a harvest and find out more information. Blowdown salvage harvest. Work also done to control multiflora rose.</p>
<p>Tract # 85-0005 District 2 & 12</p>	<p>21 acre tract. Harvested in 2016. Activity during the past year was TSI. Walked the tract and observed a few girdled trees. Same landowner did some planting on another parcel – a stand of every other row of hardwoods and pine as well as a field of warm season grasses for wildlife.</p>
<p>Tract # 43-0129 District 2 & 12</p>	<p>35 acre tract. Harvest in April 2019 of 36 trees. Removed declining walnut and cherry. Horse skidding. Invasives removal of garlic mustard and Ailanthus. Have nearly eliminated bush honeysuckle. Landowner holds an education day on the property. Wetland on property is worked around. Goal on the property was to convert field to forest in one generation.</p>
<p>Tract # 43-0365 District 2 & 12</p>	<p>14 acre. New entry to the Classified Lands program in 2018. The Stewardship plan recommended harvest in 2018-2019. Although the District Forester was not informed that there would be activity on the parcel, during the site visit it was apparent that the stand had been marked for harvest. Trees throughout tract were marked.</p>
<p>Tract # 87-0355 District 11</p>	<p>Wetland management site whereby landowner is working with stewardship plan and reclaiming trees. Some invasive control in past year and winter wheat planted. Property managed for wildlife values.</p>
<p>Tract # 87-0205 District 11</p>	<p>80 acre woodland across both sides of road. Invasive species control on grapevine, and some salvage harvesting of Ash damaged by EAB in 2018.</p>
<p>Tract # 63-0032 District 11</p>	<p>Timber harvest tract marked out for harvesting using blue paint. Consultant had conducted a pre-harvest conference and had met with district forester post harvest. Logger used old skid trails. Waterbar diversions were installed and bank stabilization. NRCS restrictions applied to site. Tree of Heaven invasive control.</p>
<p>Tract # 63-0201 District 11</p>	<p>Old spoil heaps with Virginia pine and Western Pine natives. Invasive control was conducted to eradicate Autumn olive. Oil rig sections were mapped outside of compartment area. Cut and spray application (Roundup, Garlon and 2,4D) used on Black Locust</p>

	and Tree of Heaven. Property is managed for wildlife and recreation. A fall burn was conducted.
Tract # 63 – 0019 District 11	HCVF – 2 woodland in Ag dominated landscape. Values include interior birds. Invasive control. Large shagbark Hickories evidence throughout stand.
Date: 23rd October 2019	
FMU / location / sites visited	Activities / notes
Tract # 50-0060 District 1	21 acre tract. Harvest on tract in winter 2018. Harvest took 140-150 trees. Single tree selection with a few small openings for oaks. Installed drainage structure for adjacent ag field. DF found out about harvest via the Annual Report. Landowner used consulting forester. When DF found out about harvest, went out and completed close out inspection. Fourth generation on property.
Tract # 50-0540 District 1	18 acres of younger hardwood. Managed primarily for wildlife. In the past year have done some trail work and created brush piles for wildlife. Property has been in the family since the 1940s.
Tract # 50-0452 District 1	332 acres of primarily old field planted in 2007 and 2012. Smaller portion of tract in older planting and native tree stands. Landowner actively working to eradicate invasives. Consulting forester develops management strategy for the property with landowner. Next step thinning. Planted wildlife rows along edges – dogwood, redbud. Natural stand was harvested about 10 years ago. Have been having some problems with regeneration due to deer browse.
Tract # 50-0451 District 1	20 acre tract. Windstorm salvage about 10 years ago. Marked for harvest but not sold. Goal to improve oak. The property has been in the family for about 100 years. Working with contract forester. Sale combined with two additional tracts to increase desirability.
Tract # 50-0599 District 1	68 acre tract. A portion was harvested in 2018. Harvest occurred on the oxbow peninsula bin the Yellow River. Abundant oak regeneration. BMPs along RMZ on Yellow River appear to have been followed. A variety of invasives observed.
Tract # 50-0520 District 1	44 acre tract. Primary activities recently have been invasives control and wildlife habitat. Ten acres were planted under the CRP program in 1991 but did not take well. An additional 9 acres is in wetlands. Strip mowing has occurred for wildlife openings.
Tract # 75-0057 District 1	30 acre tract. Classified as HCVF for Sand Flatwoods. Management considerations for HCVF are to avoid harvest at wet times of year. There were two distinct stands in the tract – the portion that was clearcut in 1990 and has been left to grow and a planted pine stand. An old field is also being encroached upon. Access to the tract is currently difficult. The HCVF designation was not mentioned in the Stewardship Plan. However, the Stewardship Plan was written prior to the HCVF assessment.

<p>Tract 64-0094, District 19 (Porter County)</p>	<p>199-acre tract. Entrance road recently widened, rocked, and edged seeded. Met consulting forester onsite, and auditor interviewed him. Small crushed plastic culvert effectively replaced by a riprapped chute; the consulting forester thought this was the best solution since the landowner doesn't regularly maintain roads on the property. Tract has had TSI a couple of times over the years; this year a harvest was completed one month ago. The prescription was single tree and small group selection. There was minor residual damage. Retention of large legacy trees observed. Some alder had been girdled to create snags. The consulting forester has completed a post-harvest walkthrough, and today the DNR forester is completing his final inspection. Did not harvest in a plantation area because of the prevalence of autumn olive and multiflora rose, two invasive species that the forester doesn't want to spread. Controlling these invasive species is the next step in forest management for the property; EQIP cost-share funding will be used for the work. Skid trail well-constructed, though there was slight pooling in spots from tire tracks and recent rains. Well-designed water bars have been constructed on trails. A no-mark buffer was left along Deer Creek. On the edge of the landing, there was a large pile of log ends; unfortunately, there is no chip or pulp market in the area. Harvest plan and map was shared with the auditor and reviewed; the prescription in the plan was consistent with on-the-ground observations. CFW Timber Sale Pre-Harvest Conference Form reviewed by auditor (dated 19 July 2018).</p>
<p>Tract 11-0241, District 5 (Clay County)</p>	<p>Small group selection completed in early 2018, relatively light cut. No pre-harvest meeting on file. Skid trails were overgrown, but some rutting could be seen on them. A temporary crossing of an ephemeral stream constructed with a poplar log had not been removed; DNR forester stated that he would have expected the crossing to be removed and the channel cleared. Some snags left, as well as several legacy trees. It was unclear, but it appeared that several poplar tops were crossing a property line in a bottomland area along a large stream; there were also some tops in a side channel. Harvesting in the riparian area was consistent with the requirement for leaving 75% canopy along perennial streams. In the fall, the tract will receive TSI work with the support of EQIP; the DNR forester is planning to mark the trees.</p>
<p>Tract 84-0057, District 5 (Vigo County)</p>	<p>13-acre tract at the back of a large pasture. A separate 0.59-acre patch was removed from the program in 2015. The surveyor's plat was reviewed by the auditor. The landowner participated in the site visit and was interviewed by the auditor. Previous owner of 13-acre tract retains cutting rights for the next harvest. In the last year, the only activities have been brush piling, controlling multiflora rose, and marking dead ash for removal. Deep gullies in wooded sections of the tract caused by drains from the pasture contain refuse from the previous owner; the current owner has</p>

	dumped pallets, branches, and manure from his barn. There was discussion about a possible concern of nitrogen input to the stream from the large amount of manure.
Tract 84-0190, District 5 (Vigo County), Cemetery site	Cemetery site protected by 100-ft buffer. There has been an oak release along an access trail.
Tract 84-0199, District 5 (Vigo County)	22-acre enrolled in 2017. In the last year, grapevine control has been the primary activity reported. The landowner was onsite, and the auditor interviewed her. Over the years, the landowner has worked to reduce invasive species through diligent hand pulling and promoting native species; these efforts have proved effective. Walking trail system in good condition, with bridge constructed over a small creek. There is a utility right-of-way and gas line that pass through the property; there was discussion about what chemicals, if any, the utility and pipeline companies may use in the right-of-way (see Finding 2019.1). The landowner stated that the utility company does not provide notice when it enters (last entry was in 2018). There is a shallow water duck pond in the right-of-way.
Tract 11-0018, District 5 (Clay County)	21-acre tract designated as large block HCV divided into 5- and 16-acre sections. DNR forester marked TSI four years ago; included grapevine control, crop tree release, and small openings to promote deer. The invasives multiflora rose and autumn olive were observed. Significant residual damage observed on a few stems, but generally the residual damage was minor. Hazard trees had been marked by the forester. Some girdling and brush piling have occurred to benefit wildlife.
Tract 61-0658, District 4 (Parke County)	317-acre tract with post-harvest TSI reported for the last year. Some girdling observed. Small group openings had been created with a large amount of poplar regeneration seen; the boundaries of each group were painted. Minor rutting observed on logging trails; trails had recently been sprayed with herbicide. Several trees observed to be girdled. Some residual damage was observed. An unmapped cemetery was discovered during the FSC site visit near a skid trail. The skid trail was about 25 feet from the cemetery, and it was clear that it had been used for skidding logs. The trail was adjacent to a 0.25-acre harvest opening. Since a Cemetery Development Plan as required by Indiana law was not issued for the activity that occurred within 100 feet of the cemetery, a Minor CAR was issued (see Finding 2019.3).
Tract 61-0280, District 4 (Parke County)	52-acre tract. Landowner joined the site visit, and auditor interviewed her. Primary objective is to retain a greenspace for the family. Adjoining landowner had heavily cut; the property boundary was well marked with purple paint, and there was no sign of timber trespass (a concern of the Classified landowner). In the last year, the only work that has been reported is invasives treatment (specifically, controlling tree-of-heaven). Spicebush is

	thick in places. Property was surveyed 1993, so the boundaries are accurate. Tract contains a unique, naturally-eroded gorge along a stream that feeds Little Rock Fork Creek.
Tract # 67-0020, District 4 (Putnam County)	34-acre tract set back from the roads with adjoining pastures and cornfields. Grapevine control was reported as the activity in the last year, but no evidence was seen. Invasives observed included Japanese honeysuckle and winter creeper. 0.25-acre deer food plot observed; no special permit is required for such plots.
Tract # 19-0087 District 12	131 acres. 43 acres harvested in 2018. Timber Harvest inspection in March 2019. Stand included White oak, walnut, black poplar and maple. Slight evidence of waterbars beginning to wash out. Forestry consultant involved in the project. Property managed for wildlife and recreation.
Tract # 51-0240 District 12	200 acre enrolled in 2017. To date only TSI has occurred however a harvest is planned for next year.
Tract # 51-0351 District 12	37.412 acres. Interview with landowner confirmed they had applied herbicide in the past year however did not report the volumes on the form to DoF. The District forester had not followed up with the landowner, not did they issue a non-conformity. Access tracks had invasive spray of glyphosate and crossbow. TSI vine control was also carried out. Finding 2019.4
Tract # 51-0231 District 12	400 acre wooded property. A consulting forester had recently informed the DoF of harvest commencement. The harvest was completed 4 days before the auditor site visit. Contractor demonstrated waterbar installation and harvest closeout procedures. The property owner joined the classifieds in 2007. Approximately 577,000 BF was extracted. Site contained multiple archaeological resources such as homesite, spring house and barn openings. Contractor was aware of their presence through pre-harvest commencement meeting with consultant. Timber was not sold with FSC claim.
Tract # 51-0185 District 12	62.5 acre harvest site. Property managed by consultant. BMP monitoring form was completed by district forester in December 2018. BMP issue with one section of the riparian area was raised in the form, and was rectified. Site contained some water holes. Approximately 237,577 BF were sold with FSC claim.
Tract # 51-066 District 12	HCVF 2 – forest in ag dominated landscape. 10 acre patch was harvested in 2017 with neighboring harvest unit. Flat site with Tulip poplar regenerating. TSI on other parts of the property.
Tract # 51-067 District 12	Signage for DNR Classifieds program visible. TSI work to remove invasives. No issues post-harvest. Inspected post-harvest inspection form. Oak regeneration visible.
Tract # 51-065 District 12	Signage for DNR Classifieds program visible. TSI work to remove invasives. No issues post-harvest. Inspected post-harvest inspection form. Oak regeneration visible.

Tract # 51-0102 District 12	58.2 acres. Purdue Research site for winter creeper using EQIP incentive for 3 years. Site visit was conducted by District Forester in 2018 and 2019.
Date: 24th October 2019	
FMU / location / sites visited	Activities / notes
Tract # 57-0259 District 3	25 acre tract. Annual report indicated that TSI had been done. During site visit found no indication of TSI in western side of tract. Young mixed hardwood stand with some large beech.
Tract # 57-0190 Clouse District 3	30 acre tract. Acid bog on tract is identified as an HCVF. The feature is identified in the Stewardship Plan. The landowner plans to fence around the bog and leave as is. Beavers have dammed up the bog and increased the size. Fenced are in place between forestland in the Classified program and grazing lands not in the program.
Tract # 57-0270 District 3	14 acres in tract new to the Classified program in 2018. Have had the land since 1973. Harvests about 20 trees or so every 20 years. Some firewood cutting and wildlife brush piles. Dozed autumn olive because didn't want to use chemicals.
Tract # 57-0193 District 3	47 acre tract harvested in October 2018. Cut with feller buncher. Had dry weather and harvest went quickly. Single tree selection with openings for oak regeneration. Preharvest conference conducted by the consulting foresters. Will follow up with TSI with EQIP money and will treat invasives at the same time. Confirmed BMPs applied around wetland.
Tract 60-0147, District 18 (Owen County)	<p>70-acres of woods in the uplands surrounding cornfields. The landowner joined for the site visit and was interviewed by the auditor. The farm has been in the family for 70 years but only relatively recently have the forested areas been managed. The property has a utility powerline with an easement that allows for a right-of-way; the owner said that the utility company applies herbicide (see Finding 2019.1); a small segment of the easement is within the boundary of the Classified property.</p> <p>Single-tree selection harvest last year. Targeted ash killed by EAB, as well as tulip trees. Ridgetop skidder trail observed. Trails are quite narrow, resulting in a fair amount of residual damage; while the health of the trees was not threatened, the debarking caused loss of value to timber quality. Water bars had been installed; however, two of the water bars lacked a properly-functioning outlet. Minor rilling observed. Tulip tops had been piled. Forester stated that the next steps will be a TSI treatment to remove poor quality trees. It will be cost-shared through NRCS. The farm grazes cattle, but the animals are fenced out of the wooded areas. The FMP for the property (dated October 2019) was reviewed by the auditor, as was TSI Practice Plan from 2019, an invasive species practice plan, pre-harvest evaluation form (dated 8 June 2019), and post-harvest evaluation form (dated 22 June 2018). The post-</p>

	<p>harvest evaluation form indicated that the requirement that at least 3-days' notice prior to completion of the logging operation had not been met.</p>
<p>Tract 60-0395, District 18 (Owen County)</p>	<p>104-acres of woods in the Classified Program. Harvest occurred in 2013 focused on tulip and ash removal. Evidence of recent roadside spray of autumn olive. TSI was completed last year, which included girdling of undesirable trees. Main road has rocked ford for a small stream. Main road is well protected with gravel. Good oak regeneration observed throughout stand.</p> <p>The FMP for the property (dated October 2019) was reviewed by the auditor, as was a pre-harvest evaluation form (dated 19 March 2013) and post-harvest evaluation form (dated 7 April 2013 and 24 April 2013). The post-harvest evaluation form indicated that the requirement that at least 3-days' notice prior to completion of the logging operation had not been met. No archeological sites had been previously recorded, per review by forest archeologist (email dated 31 October 2019 reviewed by auditor). Invasive Species Practice Plan also reviewed.</p>
<p>Tract 60-141, District 18 (Owen County)</p>	<p>86-acre tract, a mix of old field, bottomland hardwood, and mixed hardwood. A small portion of the SW corner is part of a large acid seep, which is very rare in this part of Indiana. There are several RTE plant and animal species found in the sphagnum moss rich seep (a list of 16 such species was reviewed by the auditor). The acid seep is considered HCV; it is not managed except for trail maintenance. The ATV/walking trail to the HCV was in generally condition and included a well-functioning bridge over a wet area; some minor rutting from an ATV was observed on the trail. Black ash mortality was also seen. The Jordan Seep Nature Preserve is adjacent to the tract.</p> <p>The FMP for the property (dated December 2016) was reviewed by the auditor, as was a TSI Practice Plan from 2016 and an Invasive Species Practice Plan.</p>
<p>Tract 60-0284, District 18 (Owen County)</p>	<p>28-acre tract with the primary management objectives being timber and wildlife. There was a harvest 15 years ago; no activities were reported for the past year. The existing stand includes good quality sassafras, as well as some black maple. The FMP for the property (dated May 2010) was reviewed by the auditor, as was a TSI Practice Plan from 2010 and an Invasive Species Practice Plan.</p>
<p>Tract # 59-0236 District 7</p>	
<p>Tract # 59-0174 District 7</p>	
<p>Tract # 59-0432 District 7</p>	
<p>Tract # 59-0433</p>	

District 7	
Tract # 59-0118 District 7	
	Closing Meeting Preparation: Auditor(s) take time to consolidate notes and confirm evaluation findings
	Closing Meeting: Review preliminary findings (potential non-conformities and observations) and discuss next steps.

3.1.2 Total Time Spent on Evaluation

A. Number of days spent on-site for evaluation:	4
B. Number of auditors participating in on-site evaluation:	3
C. Number of days spent by any technical experts (in addition to amount in line A):	0
D. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	3
E. Total number of person days used in evaluation:	15

3.1.3 Evaluation Team

Auditor name:	Ciara McCarthy	Auditor role:	Lead Auditor
Qualifications:	<p>Ciara McCarthy holds a BSc (Hons) Agroforestry from the University of Wales, UK and Oregon State University. She has accumulated over 17 years' experience working in all aspects of operational forestry in the UK, Ireland, Australia and United States. Ciara is a Senior Lead auditor for FSC Chain of Custody, a lead auditor for FSC Forest Management Certification and the Sustainable Biomass Program. She has successfully completed audits in the states of Oregon, Washington, California, Georgia, North Carolina, Virginia, Arkansas; British Columbia and New Brunswick, Canada; Latvia, North Eastern Europe; Malaysia and Japan.</p> <p>Ciara is a staff member of SCS Global Services as a Senior Lead Auditor, Technical Associate and FSC Controlled Wood Program Manager.</p>		
Auditor name:	Ruthann Schultz	Auditor role:	Team Auditor
Qualifications:	<p>For decades Ruthann has worked on issues related to landscape management, wildlife management, and the long-term stewardship of private forest and ranch lands. Over her career, she has coordinated forest certification programs for private industry. Ruthann holds a B.S. in Biology from Siena Heights College in Adrian, Michigan and a Master of Biology from the University of Louisville in Louisville, Kentucky. She is an ISO 14001 accredited auditor and has served on internal audit teams for ISO 9001. Ms. Schulte is an auditor for the SCS Forest Management and Chain of Custody programs.</p>		
Auditor name:	Stefan Bergmann	Auditor role:	Team Auditor
Qualifications:	<p>Mr. Bergmann has been in the forestry and wood products field for nearly 20 years, working across the US on forest policy, landowner extension, and forest certification. He also has senior staff executive experience with two forestry non-profits in the Midwest. Prior to joining SCS in 2017, he worked for Rainforest Alliance, overseeing the Forest Stewardship Council® (FSC®) Forest Management auditing program in the US. He has successfully completed FSC Forest Management Lead Auditor training, ISO 9001 Lead Auditor training, and</p>		

	is qualified to be an SFI team auditor. He has served as lead and team auditors on numerous FSC FM audits around the country. He holds a BS in Wildlife Science and an MS in Forest Resources, both from Oregon State University, and recently completed an MBA at the University of California Davis.
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3.2 Evaluation of Management System

3.2.1 Methodology and Strategies Employed

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME's conformance to FSC standards and policies. Evaluation methods include reviewing documents and records, interviewing FME personnel and contractors, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observing implementation of management plans and policies in the field, and collecting and analyzing stakeholder input. When there is more than one team member, each member may review parts of the standards based on her or his background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, interviews, stakeholder comments, and reviewed documents and records. Where consensus among team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

3.2.2 Pre-evaluation

- A pre-evaluation of the FME *was not* required by FSC norms.
- A pre-evaluation of the FME was conducted as required by and in accordance with FSC norms.

3.3 Stakeholder Consultation Process

In accordance with SCS protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. Distinct purposes of such consultation include:

- To solicit input from affected parties as to the strengths and weaknesses of the FME's management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. A public notice was sent to stakeholders at least 6 weeks prior to the audit notifying them of the audit and soliciting comments.

3.3.1 Stakeholder Groups Consulted

Principal stakeholder groups are identified based upon results from past evaluations, lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources. Stakeholder groups who are consulted as part of the evaluation include FME management and staff, consulting foresters, contractors, lease holders, adjacent property owners, local and regionally-based social interest and civic organizations, purchasers of logs harvested on FME forestlands, recreational user groups, tribal members and/or representatives, members of the FSC National Initiative, members of the regional FSC working group, FSC International, local and regionally-based environmental organizations and conservationists, and forest industry groups and organizations, as well as local, state, and federal regulatory agency personnel and other relevant groups.

3.3.2 Summary of Stakeholder Comments and Evaluation Team Responses

The table below summarizes the major comments received from stakeholders and the evaluation team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

Stakeholder Comment	SCS Response
N/A no comments received	

4. Results of Evaluation

4.1 Notable Strengths and Weaknesses of the FME Relative to the FSC P&C

Table below contains the evaluation team’s findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. Weaknesses are noted as Corrective Action Requests (CARs) related to each principle.

Principle / Subject Area	Identified Strengths Relative to Conformity to the Standard	Identified Weaknesses Relative to Conformity to the Standard
P1: FSC Commitment and Legal Compliance		
P2: Tenure & Use Rights & Responsibilities		
P3: Indigenous Peoples’ Rights		

P4: Community Relations & Workers' Rights		
P5: Benefits from the Forest		
P6: Environmental Impact		
P7: Management Plan		
P8: Monitoring & Assessment		
P9: High Conservation Value Forests		
P10: Plantations		
Chain of Custody		
Group Management		

4.2 Process of Determining Conformance

4.2.1 Structure of Standard and Degrees of Nonconformance

FSC-accredited forest stewardship standards consist of a three-level hierarchy: principle, the criteria that correspond to that principle, and the performance indicators that elaborate each criterion. Consistent with SCS Forest Conservation Program evaluation protocols, the team collectively determines whether or not the subject forest management operation is in conformance with every applicable indicator of the relevant forest stewardship standard. Each nonconformance must be evaluated to determine whether it constitutes a major or minor nonconformance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in nonconformance. The team therefore must use their collective judgment to assess each criterion and determine if the FME is in conformance. If the FME is determined to be in nonconformance at the criterion level, then at least one of the applicable indicators must be in major nonconformance.

Corrective action requests (CARs) are issued for every instance of a nonconformance. Major nonconformances trigger Major CARs and minor nonconformances trigger Minor CARs.

4.2.2 Interpretations of Major CARs, Minor CARs and Observations

Major CARs: Major nonconformances, either alone or in combination with nonconformances of all other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out before a certificate can be awarded. If Major CARs arise after an operation is certified, the timeframe for correcting these nonconformances is typically shorter than for Minor CARs. Certification is contingent on the certified FME's response to the CAR within the stipulated time frame.

Minor CARs: These are corrective action requests in response to minor nonconformances, which are typically limited in scale or can be characterized as an unusual lapse in the system. Most Minor CARs are the result of nonconformance at the indicator-level. Corrective actions must be closed out within a specified time period of award of the certificate.

Observations: These are subject areas where the evaluation team concludes that there is conformance, but either future nonconformance may result due to inaction or the FME could achieve exemplary status through further refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However, observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into nonconformance.

4.3. Existing Corrective Action Requests and Observations

Finding Number: 2018.1	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US FM 5.1.a (FSC-STD-30-005, 6.1)
<p>Non-Conformity: This Minor CAR was upgraded from OBS 2017.1. 2017 finding: With the planned retirements in late 2017 and 2018, DoF has is an anticipated 25% vacancy rate in District Foresters (DF). Additional changes include assigning several districts to various forestry staff to cover vacancies. The DNR has been filling some open vacancies, for example three new District Foresters were hired in 2017. However, the DNR has not provided evidence that a systematic management review of program service demands relative to District Forester capacity has been done, nor that such review is planned. Although the DNR is currently in conformance with the standard and able to meet this indicator, the issue of how investment/reinvestment in forester capacity to implement core management activities could become non-conformant in future years if capacity does not meet demand.</p> <p>2018 update: At the time of the 2018 audit there were 4 vacancies in the 20 districts and a new forester had been hired to fill 1 vacancy, leaving 3 vacancies total. District Foresters from different Districts were then required to cover districts still holding vacancies. There was no evidence presented of a systematic management review of program service demands relative to District Foresters (Observation 2017.1). Interview with staff indicated such a review may have been started but no results were presented. Given new evidence of insufficient conformance to the standard, see Minor CAR 2018.2 and 2018.3 this finding is being upgraded to a Minor.</p>	
Corrective Action Request (or Observation):	

<p>The manager demonstrates capability to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management. (FSC US FM 5.1.a.) The Group entity shall have sufficient human and technical resources to manage and control the Group in line with the requirements of this standard. (FSC-STD-30-005, 6.1)</p>	
<p>FME response <i>(including any evidence submitted)</i></p>	<p>After several years of negotiations with the Natural Resources Conservation Service (NRCS), in October 2019, the Division of Forestry received a 4 year grant from NRCS. The Division of Forestry serves as the primary forestry technical provider of NRCS programs EQIP and CSP. The purpose of the grant is to reimburse the Division of Forestry for staff time spent promoting NRCS programs, plan writing, and conducting practice checks. The grant is for \$200,000/year. The grant will allow us to fill 3-4 currently vacant district forester positions. The first position (District 17) has been posted and interviews will be conducted in November 2019. Next position is to be posted and filled January 2020. The third position is to be posted and filled March 2020. Ability to fill 4th position will be determined at that point.</p> <p>The DoF continues to seek other revenue sources to maintain and ideally expand our private forest land resources.</p>
<p>SCS review</p>	<p>At the time of the audit Assistant District Forester position vacancies had been advertised. The active recruitment process is planned to continue over the next 4 years so the FME can fill the current vacancies (3 or 4).</p>
<p>Status of CAR:</p>	<p><input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above): <i>Upgraded to Minor CAR 2018.1</i></p>

<p>Finding Number: 2018.2</p>	
<p>Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation</p>	
<p>FMU CAR/OBS issued to (when more than one FMU):</p>	
<p>Deadline</p>	<p><input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):</p>
<p>FSC Indicator:</p>	<p>Indicator 6.1.b Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a. This includes:</p> <p style="padding-left: 40px;">v. Description of environmental assessment and safeguards based on the assessment, including approaches to: (1) pest and weed management, (2) fire management, and (3) protection of riparian management zones; (4) protection of representative samples of existing ecosystems (see Criterion 6.4) and management of High Conservation Value Forests (see Principle 9).</p>

Non-Conformity (or Background/ Justification in the case of Observations):

The Umbrella Plan of the ICFCG identifies pre-harvest meetings to serve as environmental assessment prior to starting forest management.

"At the group member level, the district foresters will be involved in timber sales on group lands and will monitor the implementation of BMPs. The district forester will hold a pre-harvest conference with the landowner, professional forester, and logger. BMPs will be one of the discussion points. The district forester will be conducting at least one field visit during the active harvest and can monitor adherence to BMPs. A post-harvest field visit will also be conducted and BMPs will be considered during this visit. Corrective action requests will be issued as necessary to insure compliance with the BMP guidelines."

Although some information is contained within the property forest management plan, detailed consideration of BMP requirements for stream, RTE, pest and weeds, and other considerations are not being consistently conducted. The DoF did not present evidence that such omissions are being noted, tracked or addressed. See also related Minor 2018.3 (internal auditing).

There were examples during the audit of staff not completing the required pre-harvest meetings. During interviews it was also discovered that it is not uncommon for District Foresters to not be informed of planned harvest activities. In some cases, the ICFCG group management may be informed by the annual monitoring form, foresters may inadvertently discover harvested areas, or landowners may notify when the harvest has already begun. In one example, the forester did not know a corrective action was required nor did they take corrective action for failure to notify. See related Minor 2018.3.

Corrective Action Request (or Observation):

ICFCG must ensure conformance to the standard requirements for site assessments prior to commencement of harvest activities to ensure forest protection elements are considered.

FME response
(including any evidence submitted)

The Division of Forestry (DoF) has instituted proactive steps to increase the likelihood landowners and/or foresters will inform District Foresters of upcoming harvests:

- 1) Classified Forest & Wildlands Newsletter article, *So you want to have a timber harvest...*, provided a flow chart for timber sales on Classified Forest & Wildlands. The newsletter goes to all classified landowner with their Annual Report.
- 2) All landowners who reported that they were planning a timber harvest on their Annual Report were individually contacted by their district forester and provided information (letter and *Required Elements of a Certified Timber Sale Contract* if appropriate).

For timber harvests reported on Annual Reports, District Foresters checked to see if we had been contacted. If we had not been contacted an informative CAR was issued to promote contact to prevent future issues. If the forester had not been to the site, a site visit was conducted.

SCS review	A proactive approach has been taken by the DoF by releasing the Classified Forest & Wildlands Newsletter article in May 2019. Evidence of newsletter was viewed by auditor. The Newsletter outlined a flow chart of the process for conducting a harvest and informing the DoF. Landowners reported they were planning a harvest were contacted by their District forester via mail outlining the necessary steps on the checklist.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2018.3	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-STD-30-005, 2.3. Group entity staff and Group members shall demonstrate knowledge of the Group’s procedures and the applicable Forest Stewardship Standard.
Non-Conformity (or Background/ Justification in the case of Observations): During audit inspections review of tract folders, it was discovered some files were missing close-out documents. Interviews with staff confirmed at least 2 District Foresters were unsure if ICFCG group management procedures require a close out, or BMP inspection, after harvests are completed or stated they did not have time to do them. Another topic identified was an inconsistent understanding and implementation by staff of actions to take when land owner/ group members fail to notify staff prior to harvesting.	
Corrective Action Request (or Observation): The group manager must ensure that staff is able to demonstrate knowledge of group procedures relative to requirements that meet this standard. This includes: 1) conducting post-harvest site inspections to determine if appropriate protections have been implemented, or corrective actions taken, if needed. 2) Knowing and carrying out procedures for landowners who fail to notify of timber sales harvests.	
FME response (including any evidence submitted)	Division of Forestry held certification related training for District Foresters: Division Meeting, February 26-28, 2019 Section Meeting, August 7, 2019. Also, the proactive steps discussed in CAR 2018.2 also have made district foresters more aware of the process since they are active contacting landowners who reported planning a harvest.

SCS review	Following on-site field visits and interviews with foresters, the implementation of the management procedures was inconsistent by staff. Recent training had occurred, however evidence of effectiveness in practice was not yet adequately demonstrated. Upgraded to Major CAR 2019.4
Status of CAR:	<input type="checkbox"/> Closed <input checked="" type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2018.4	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-STD-30-005, 3.2. The Group entity’s procedures shall be sufficient to establish an efficient internal control system ensuring that all members are fulfilling applicable requirements.
Non-Conformity (or Background/ Justification in the case of Observations): No internal audits were being done for the Chain of Custody system. Procedures in the Umbrella Plan were discovered that are not the procedures being implemented in the field related to CoC procedures. Internal auditing is not fully inspecting implementation of group procedures in the field sufficient to demonstrate conformance to the FSC Group management and US Forest Management Standard (see Minor CAR 2018.3).	
Corrective Action Request (or Observation): The group manager must conduct internal audits, document results, and track and issue corrective actions relative to chain of custody procedures; group manager must conduct internal audits conformant with requirements of the FSC group management standard for conducting internal audits.	

<p>FME response (including any evidence submitted)</p>	<p>The Division of Forestry (DoF) has conducted two new internal audits:</p> <ol style="list-style-type: none"> 1) Reported timber sale review: District foresters were given a list of all timber harvests reported on the <i>2018 Classified Forest & Wildlands Annual Report</i> that occurred on certified tracts. The district forester had to check the files to determine if the landowner had contact the DoF in advance of the sale. If the landowner or their representative had not informed the DoF, the District Forester was to issue an informative CAR. If the District Forester had not been to the site, they were to schedule a field visit to complete a final harvest review. 2) CoC review: DoF ran a database query to pull certified timber sales that the landowner marked as being sold FSC certified. For each of the 13 sales, the landowner was contacted for a copy of the sale inventory and sale contract. Each contract was then reviewed for <i>Required Elements of a Certified Timber Sale Contract</i>. <p>Findings of review:</p> <ul style="list-style-type: none"> • 11 of 13 sales had a contract. One sale the landowner took looks directly to a non-certified mill. One sale was on mill owned property and wood used in uncertified mill. • 3 of the 13 sales were sold to companies in the Indiana CoC Group and potentially moved down the CoC. One contract included all contract requirements with the exception of contact information of seller and buyer. The remaining two contracts did not include a claim and were missing other required elements. • Required Element: <i>Names & contact information for parties involved in sale</i> 5 of 11 contracts contained both names and contact information. 6 contracts contained only names of parties. • Required Element: <i>Estimated volume in sale by species</i> 4 contracts included tally of volume by species. Another 4 contracts included tally by reference. 1 contract only included the number of trees. 2 contracts didn't include by sale notice had tally. • Required Element: <i>Specific certification language for CoC (claim)</i> 4 contracts had appropriate claims. 5 contracts made no claims. 4 contracts had wrong or incomplete claims. • Required Element: <i>Adherence to laws requirement</i> 5 contracts had full requirements. 4 contracts had not requirements. 2 contracts had partial (referencing OSHA, license timber buyer, or Worker's Comp requirement). • Required Element: <i>BMP requirement</i> 9 contracts required BMP. 2 contracts only require smoothing ruts.
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	<p>Action steps:</p> <ul style="list-style-type: none"> • Landowner education on when and when not to report as FSC sale on Annual report and contract requirements of sale with article in 2020 Classified Forest & Wildlands newsletter. Continue providing contract requirements to certified landowners who report they are planning on having a sale. • Forester education by either hosting another Certification Training Day for Professional Foresters and/or by presenting at meeting (example Indiana Association of Consulting Foresters). • Timber buyer education through CoC group. • Continue review of sales reported as FSC sales.
SCS review	DoF conducted 2 internal audits resulting in some findings and demonstrated actions taken to rectify system to ensure compliance with standard.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

4.4. New Corrective Action Requests and Observations

Finding Number: 2019.1	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard (v1.0), Indicator 6.6.a
Non-Conformity (or Background/ Justification in the case of Observations): The Big River FMU has an easement with a utility company that allows for vegetation control under powerlines. The audit team clarified via interviews with FME management and staff that the FME has not requested pesticide use from or placed pesticide use restrictions on the power company.	
Corrective Action Request (or Observation): FSC US Forest Management Standard (V1-0) Indicator 6.6.a states No products on the FSC list of Highly Hazardous Pesticides are used. The FME should collect information on the use of pesticides by the users with specific rights of use on the FME, or excise these sites from the FMU. If pesticide use is not reported, then it is not possible to compare all chemicals used with the FSC list of Highly Hazardous Pesticides.	

FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2019.2	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard (v1.0) 9.3.a
<p>Non-Conformity <i>(or Background/ Justification in the case of Observations):</i> Since the INFMS database is part of the management plan and the information regarding HCVF status for a tract is readily available in INFMS database, the program is in conformance. However, an HCV feature was not indicated in two of the Stewardship Plans for tracts that contain HCVs. In both cases the Stewardship Plan was developed prior to the 2016 HCVF Assessment. On the other hand, a tract with an HCV feature that had a Stewardship Plan developed in 2017 (after the HCVF Assessment) did contain the information regarding the HCV feature and risk avoidance measures.</p> <p>Without the information regarding the HCV feature being in the Stewardship Plan there is no way for a consulting forester to know that the HCV feature exists.</p>	
<p>Corrective Action Request <i>(or Observation):</i> Indicator 9.3.a: The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.</p> <p>On tracts that contain HCV features and have a Stewardship Plan that was developed prior to the availability of the HCV information on INFRMS, the Stewardship Plan should be updated to include the information regarding the HCV feature and risk avoidance measures.</p>	
FME response <i>(including any evidence submitted)</i>	

SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2019.3	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US Forest Management Standard (V1-0), Indicator 4.4.a
<p>Non-Conformity (or Background/ Justification in the case of Observations):</p> <p>On Tract 61-0658, where an active harvest with group openings had been completed in 2018 and reported to the forester post-harvest, the audit team discovered an unmapped cemetery near a skid trail. The skid trail was about 25 feet from the cemetery, and it was clear that it had been used for skidding logs. The trail was adjacent to a 0.25-acre harvest opening.</p> <p>Indiana Code 14-21-1 provides protection to archeological sites and cemeteries on private and public land by prohibiting ground disturbance within 100 feet of a cemetery without an approved plan from the IDNR-Division of Historic Preservation and Archeology (DHPA). In consultation with the DNR Forest Archeologist, the audit team determined that the landowner should have acquired a Cemetery Development Plan prior to conducting active skidding within 100 feet of the cemetery. No such Cemetery Development Plan was issued.</p>	

Corrective Action Request (or Observation):	
Indicator 4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on: <ul style="list-style-type: none"> • Archeological sites and sites of cultural, historical and community significance (on and off the FMU); • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. <p>The forest owner or manager shall understand the likely social impacts of management activities and incorporate this understanding into management planning and operations. Social impacts shall include archeological sites and sites of cultural, historical and community significance, including cemeteries.</p>	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2019.4	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input checked="" type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-STD-30-005, 2.3. Group entity staff and Group members shall demonstrate knowledge of the Group’s procedures and the applicable Forest Stewardship Standard.

<p>Non-Conformity (or Background/ Justification in the case of Observations):</p> <p>During audit inspections review of tract folders, it was discovered some files were missing close-out documents. Interviews with staff confirmed at least 2 District Foresters were unsure if ICFCG group management procedures require a close out, or BMP inspection, after harvests are completed or stated they did not have time to do them. Another topic identified was an inconsistent understanding and implementation by staff of actions to take when land owner/ group members fail to notify staff prior to harvesting.</p>	
<p>Corrective Action Request (or Observation):</p> <p>The group manager must ensure that staff is able to demonstrate knowledge of group procedures relative to requirements that meet this standard. This includes: 1) conducting post-harvest site inspections to determine if appropriate protections have been implemented, or corrective actions taken, if needed. 2) Knowing and carrying out procedures for landowners who fail to notify of timber sales harvests.</p>	
<p>FME response (including any evidence submitted)</p>	<p>The Division of Forestry has taken several steps to ensure staff is knowledgeable of group procedures:</p> <ol style="list-style-type: none"> 1) Hands on Implementation: A spreadsheet of all reported (2018 Classified Forest & Wildlands Annual Report) timber sales on ICFCG properties was created. District foresters were required to document dates various steps were completed. It work had not been completed, district forester had to complete steps and document. District foresters sent completed spreadsheets along with supporting forms to prove work had been completed to Certification Manager. Evidence: <i>Certified Timber Sales 02-20-2020.xlsx</i> 2) Certified Timber Harvest Training: On February 19, 2020, the Certification Manager held at training on how to handle timber harvests within the certified group. All district foresters were present. District foresters were broken into teams. As a team, they develop a work flow for certified sales. The groups were brought back together and a draft overall work flow was created. Evidence: Training sign in sheet (<i>Certification Training Sign In Sheets 2-19-2020.docx</i>); Certified Timber Sale Work Flow (<i>Certified Timber Sale Work Flow.docx</i>). 3) Performance Targets: In 2020 each district forester has had a certification specific work performance target set in their work plan for the year. The target requires the completion of proactive outreach to industry regarding timber sales on Classified lands, sending timber sale information packets to landowners who report they are planning on having a harvest, conducting preharvest, active harvest, and post-harvest inspections, and issuing CARs as necessary. In past years, this was not clearly listed in their work targets but lump in as part of Classified Forest & Wildlands Program administration.
<p>SCS review</p>	<p>FME has taken several additional steps to ensure staff are adhering to group procedures. These steps have included additional training, performance target implementation and reporting.</p>

Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>
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4.5 Major Nonconformances

	No Major CARs were issued to the FME during the evaluation. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
	Major CARs were issued to the FME during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
x	Major CARs were issued to the FME during the evaluation and the FME has not yet satisfactorily closed all Major CARs.

5. Certification Decision

Certification Recommendation	
FME be awarded FSC certification as a “Well-Managed Forest”.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Forest Conservation Program evaluation protocols. A positive certification decision indicates that:</p> <ul style="list-style-type: none"> ▪ Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a new certificate; ▪ No Major CARs were issued to the FME during the evaluation; ▪ Any Major CARs issued during the audit were closed prior to report finalization; ▪ The FME has demonstrated that its system of management is capable of ensuring that all of the requirements of the applicable standards (see Section 1.6 of this report) are met over the forest area covered by the scope of the evaluation; ▪ The FME has demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate. 	
Comments:	

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – Current and Projected Annual Harvest

The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood):	
Explanation of the assumptions, methodology, and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	

Appendix 2 – List of FMUs Selected for Evaluation

- FME consists of a single FMU
 FME consists of multiple FMUs or is a Group

SCS staff establishes the design and level of sampling prior to each group or multiple FMU evaluation according to FSC-STD-20-007. A list of the FMUs sampled and the rationale behind their selection is listed below.

FMU Name	FMU Size Category: - SLIMF - non-SLIMF - Large > 10,000 ha	Forest Type: - Plantation - Natural Forest	Rationale for Selection: - Random Sample - Stakeholder issue - Ease of access - Other – please describe
Bear Wallow & Rattle Snake Ridge	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 55-0053	SLIMF	Natural	Existing, Random (pre-selected, random)
CRP planting, District 14 (Morgan County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 23-0169, District 13 (Fountain County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 23-0146, District 13 (Fountain County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 23-0173, District 13 (Fountain County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 23-0105, District 13 (Fountain County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 23-0117, District 13 (Fountain County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 23-0148, District 13 (Fountain County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 23-0059, District 13 (Fountain County)	SLIMF	Natural	Existing, Random (pre-selected, random)

Tract 54-0029, District 13 (Montgomery County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 54-0033, District 13 (Montgomery County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 54-0061, District 13 (Montgomery County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 85-0060 District 2 & 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 85-0005 District 2 & 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 43-0129 District 2 & 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 43-0365 District 2 & 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 87-0355 District 11	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 87-0205 District 11	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 63-0032 District 11	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 63-0201 District 11	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 63 – 0019 District 11	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 50-0060 District 1	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 50-0540 District 1	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 50-0452 District 1	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 50-0451 District 1	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 50-0599 District 1	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 50-0520 District 1	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 75-0057 District 1	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 64-0094, District 19 (Porter County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 11-0241, District 5 (Clay County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 84-0057, District 5 (Vigo County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 84-0190, District 5 (Vigo County), Cemetery site	SLIMF	Natural	Existing, Random (pre-selected, random)

Tract 84-0199, District 5 (Vigo County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 11-0018, District 5 (Clay County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 61-0658, District 4 (Parke County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 61-0280, District 4 (Parke County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 67-0020, District 4 (Putnam County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 19-0087 District 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 51-0240 District 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 51-0351 District 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 51-0231 District 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 51-0185 District 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 51-066 District 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 51-067 District 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 51-065 District 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 51-0102 District 12	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 57-0259 District 3	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 57-0190 Clouse District 3	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 57-0270 District 3	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 57-0193 District 3	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 60-0147, District 18 (Owen County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 60-0395, District 18 (Owen County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 60-141, District 18 (Owen County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract 60-0284, District 18 (Owen County)	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 59-0236 District 7	SLIMF	Natural	Existing, Random (pre-selected, random)

Tract # 59-0174 District 7	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 59-0432 District 7	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 59-0433 District 7	SLIMF	Natural	Existing, Random (pre-selected, random)
Tract # 59-0118 District 7	SLIMF	Natural	Existing, Random (pre-selected, random)

Appendix 3 – Additional Evaluation Techniques Employed

None.

Additional techniques employed (*describe*):

Appendix 4 - Staff and Stakeholders Consulted

List of FME Staff Consulted

To protect privacy, **only FME staff who have expressly provided written permission are listed**. These records are retained by SCS and subject to FSC or ASI examination.

Name	Title	Contact Information	Consultation method
Zachary Smith	Forest Program Coordinator	zsmith@dnr.in.gov	Interview
Breda Huter	Forest Stewardship Coordinator	bhuter@dnr.in.gov	Interview
John Friedrich	Property Program Specialist	jfriedrich@dnr.in.gov	Interview
Jack Seifert	State Forester	jseifert@dnr.in.gov	Interview
B Rody	District Forester	brody@dnr.in.gov	Interview
J Sobiecki	Assistant District Forester	jesobiecki@dnr.in.gov	Interview
James Potthoff	District Forester	jpotthoff@dnr.in.gov	Interview
Quentin Beahrs	District Forester	260-228-9062	Interview

List of other Stakeholders Consulted*

To protect privacy, **only stakeholders who have expressly provided written permission are listed**. These records are retained by SCS and subject to FSC or ASI examination.

List of other Stakeholders Consulted*

Name	Title	Contact Information	Consultation method	Requests Stakeholder Notification? (Y/N)
Chris Neggers	Forester	cneggers@tnc.org	Interview	Y
Sarah Solano	Secretary – Baker Forest Co.	Solano@rtcol.com	Interview	Y
Paul Baker	President – Baker Forest Co	Solano@rtcol.com	Interview	Y
Rex Brock	Forest Land Owner	574-248-0072	Interview	Y
Max Brock	Forest Land Owner	765-932-5641	Interview	Y
Angela Scott	Woodland Owner	angelasuescott@icloud.com	Interview	Y
Rick Scott	Woodland Owner	Rscott1959@gmail.com	Interview	Y
Bryan Wirsen	Woodland Owner	Bryanwir@att.net	Interview	Y
Bruce Wargland	Consulting Forester	574-298-3242	Interview	Y
Don Thompson	Owner	202-257-1590	Interview	Y
Andrew Suseland	Consulting Forester	574-952-8030	Interview	Y
James Alspaugh	Owner	260-693-4022	Interview	Y
Jacob Hougham	Consulting Forester	Jhougham8@gmail.com	Interview	Y
Mark Nussbaum	Owner	206-403-4114	Interview	Y
T Crowe	Consultant	Toms.trees@hotmail.com	Interview	Y

* Note: SCS may maintain additional records of stakeholder consultation activities (e.g., email notifications) in its recordkeeping system. Anonymous stakeholders may have provided comments as a part of stakeholder outreach activities.

Appendix 5 – Required Tracking

Pesticide Derogations

There are no active pesticide derogations for this FME.

Name of pesticide / herbicide (active ingredient)	Date derogation approved

Condition	Conformance (C / NC)	Evidence of progress

Progressive HCVF Assessments

FME does not use partial or progressive HCVF assessments.

Note: In the case the FME is not operating in the entire management unit, it is permissible to only complete an HCVF assessment for the portion of the unit in which they are operating under special conditions. In such cases, the HCVF assessment must be extended if new areas are entered without an existing, appropriate HCVF assessment having been completed. An example includes a large forest concession where harvesting is initially limited to a smaller geographic scope.

Partial or progressive HCV must be noted in SCS tracking system for monitoring. Describe below the FME monitoring plan to ensure additional HCVF assessments are completed as necessary:
HCV Monitor Plan

Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit

<input type="checkbox"/>	Not applicable; no significant issues identified that may impact the next audit.
Some issues were identified during this audit that the next audit team could consider in the next audit, such as:	
<input type="checkbox"/>	Scope of certificate:
<input type="checkbox"/>	Audit sampling:
<input type="checkbox"/>	Audit time:
<input type="checkbox"/>	Audit season:
<input type="checkbox"/>	Travel time between sites or FMUs:
<input type="checkbox"/>	Audit frequency:
<input type="checkbox"/>	Suggested audit team competency for next audit:
<input type="checkbox"/>	Suggested requirements to include during the next audit:
<input type="checkbox"/>	Suggested issues investigate during the next audit:
<input type="checkbox"/>	Suggested sites for inspection:
<input type="checkbox"/>	Stakeholders to be consulted:
<input type="checkbox"/>	Other(s) – please describe:

Appendix 6 – Forest Management Standard Conformance Table

C= Conformance with Criterion or Indicator

C/NC= Overall Conformance with Criterion, but there are Indicator nonconformances

NC= Nonconformance with Criterion or Indicator
 NA= Not Applicable

REQUIREMENT	C/NC	COMMENT/CAR
Principle #1: Compliance with Laws and FSC Principles Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
1.1 Forest management shall respect all national and local laws and administrative requirements.	C	
1.1.a Forest management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements (e.g., regulations). Violations, outstanding complaints or investigations are provided to the Certifying Body (CB) during the annual audit.	C	The Indiana Classified Forest Certified Group (Indiana Department of Natural Resources – Division of Forestry) exhibits strong conformance with laws, rules, and regulations. There are no enforcement actions against the agency related to compliance with applicable federal, state, or local forestry and related environmental laws and regulations. As individual group management plans typically are prepared using DNR’s templates, FMPs and operations reviewed demonstrate overall compliance considering the size of the group.
1.1.b To facilitate legal compliance, the forest owner or manager ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.	C	Indiana DNR has an extensive set of internal administrative policies that helps to assure compliance with laws. Training is provided to employees to make them aware of requirements. Notices and updates to policies are regularly distributed. Department legal staff advises the agency as appropriate. Interviews with staff indicate that the Indiana State Code is readily available via the Internet. <i>Indiana Classified Forest Certified Group Umbrella Management Plan</i> (dated October 2019) and sample timber sale contract language both include sections on compliance with laws and regulations.
1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	C	
1.2.a The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.	C	As this is a state tax incentive program, group member payment of annual property taxes is the only fee required. The fee for Classified Forests is based on a per-acre assessed value. Non-payment has not been an issue.

<p><i>FF Indicator: Low risk of negative social or environmental impact.</i></p>		
<p>1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</p>	C	
<p>1.3.a. Forest management plans and operations comply with relevant provisions of all applicable binding international <i>agreements</i>. <i>FF Indicator: Low risk of negative social or environmental impact</i></p>	C	<p>International treaties are implemented through federal legislation such as the YS Lacy Act. The IDNR has internal procedures demonstrating conformance to this and other applicable treaties.</p> <p>In the State of Indiana, there is one forest species covered under CITES, <i>Panax quinquefolius</i> or American ginseng. In the US, each state is responsible for regulating the commercial sale of this CITES-listed species. Commercial harvest of ginseng is regulated through the Indiana Administrative Code; commercial harvesters and sellers must obtain permits and licenses through the State of Indiana and adhere to harvesting practices intended to maintain the ginseng resource.</p>
<p>1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.</p>	C	
<p>1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.</p>	C	<p>The audit team found no evidence of conflicts between State of Indiana laws and the <i>FSC-US Forest Management Standard</i>. IDNR staff reported no known conflicts.</p>
<p>1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</p>	C	
<p>1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the Forest Management Unit (FMU).</p>	C	<p>Each group member is responsible for monitoring for illegal harvesting, settlement, or other unauthorized activity. During the 2019 audit, most group member private properties were observed to be protected by gates, with accompanying ‘no trespassing’ signage and purple-painted boundaries. A new state law has designated purple paint to signify property boundaries and as legal as ‘no trespassing’ signage. Many properties also had Classified Program signage.</p>

		<p>Group regulations require posting the corners of enrolled properties. During 5-year re-inspections in the department, district foresters take note of any unauthorized activities that they may see and notify landowners. Some landowners use hidden cameras to monitor activity.</p>
<p>1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.</p>	<p>C</p>	<p>At one site visit (Tract 23-0169, District 13 Fountain County), the auditor noted an old trailer and other trash; the DNR forester stated that he would require that it be removed, as properties in the program cannot contain trash. By demonstrating that the situation would be addressed, the forester conveyed clear evidence of conformance with this indicator.</p> <p>In some instances, owners work with Conservation Officers, such as if an illegal activity is detected. District Foresters can assist group members with guidance if timber theft or illegal activities are noted.</p>
<p>1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</p>	<p>C</p>	
<p>1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.</p>	<p>C</p>	<p>The Classified Forest Umbrella Management Plan includes a requirement that “Landowners are the group members and are responsible for implementing the FSC certification standards and policies on their classified forests” (p 1). The Umbrella Plan is publicly-available on the IDNR website.</p>
<p>1.6.b. If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.</p>	<p>C</p>	<p>For participating landowners, the group program’s rules provide that “All of a landowner’s eligible parcels will be included in the group certification” (Umbrella Plan, p 6). Under statute, a parcel of land may not be classified under the program if a dwelling or other building is situated on the parcel.</p> <p>Also, a parcel of land may not be classified under the program if it is grazed by domestic animals or confined non-domesticated animals.</p> <p>At one site visit (Tract 60-0147, Owen County), the farm grazes cattle, but the animals are fenced out of the wooded areas that are in the Classified Program; this is</p>

		<p>clear evidence of conformance with the grazing restriction for the program.</p> <p>The IDNR has excised 340k acres statewide for non-forested acres and private landowners who have declined certification and are therefore not part of the FSC group.</p>
<p>1.6.c. The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.</p> <p><i>FF Indicator 1.6.c The forest owner, manager or group manager notifies the Certifying Body of significant changes in ownership, the certified land base and/or significant changes in management planning prior to the next scheduled annual audit, or within one year of such change, whichever comes first.</i></p>	C	<p>IDNR managers has provided an updated roster of group members. Member details were available to the audit team via the INFRMS database.</p>
<p>Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</p>		
<p>2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</p>	C	
<p>2.1.a The forest owner or manager provides clear evidence of long-term rights to use and manage the FMU for the purposes described in the management plan.</p>	C	<p>As described in the <i>Classified Forest & Wildlands Procedures Manual</i>, the landowner’s ownership is verified during the application phase, if there is a change in ownership, and in the case of delinquent annual reports.</p>
<p>2.1.b The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.</p>	C	<p>Use and access rights held by others that impact the landowner’s management are recorded in the property deeds and leases.</p>
<p>2.1.c Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries.</p>	C	<p>Auditors observed boundaries to be clearly marked on maps that are recorded as part of each Classified Forest enrollment. The application maps must be made by a licensed surveyor or by the Division of Forestry GIS Specialist. District foresters are able to prepare general property maps using digital data from the state and/or counties. Boundaries of harvest areas were observed to be well marked in the field. Many of the property record folders reviewed by the audit team contained surveys. Boundaries were also clearly identified on the ground with fences and blazes painted purple, in accordance with the new state law.</p>

<p>2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</p>	<p>C</p>	
<p>2.2.a The forest owner or manager allows the exercise of <i>tenure</i> and <i>use rights</i> allowable by law or regulation.</p>	<p>C</p>	<p>The most common example of a right held by an outside party on Classified land is a right of way for a power line or gas line. Such rights are typically noted in the property deeds and are allowed by the landowner.</p>
<p>2.2.b In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.</p>	<p>C</p>	<p>Although this rarely is necessary, occasionally a landowner will have to notify the local power company of operations using heavy machinery, to ensure underground cable or gas lines are not damaged during harvests or other management activities.</p>
<p>2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p>	<p>C</p>	
<p>2.3.a If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes. FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>No significant disputes were noted by any of the district foresters interviewed. Property disputes or use rights are generally the business of the private landowner and the IDNR is not often involved.</p>
<p>2.3.b The forest owner or manager documents any significant disputes over tenure and use rights. FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>No evidence of non-compliance was noted during the field audit. No significant disputes were noted.</p>
<p>Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</p>		
<p>3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</p>	<p>C</p>	
<p>3.1.a Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.</p>	<p>C</p>	<p>The Potawatomi Indians have a few properties enrolled in the Classified Program. The program does not have any restrictions that would prevent tribal representatives from carrying out forest management in accordance with tribal laws and customs and relevant federal laws.</p>

<p>3.1.b The manager of a tribal forest secures, in writing, informed consent regarding forest management activities from the tribe or individual forest owner prior to commencement of those activities.</p>	<p>C</p>	<p>The Potawatomi Indians are the managers of their properties enrolled in the Classified Program, and thus informed consent is not necessary.</p>
<p>3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</p>	<p>C</p>	
<p>3.2.a During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.</p>	<p>C</p>	<p>The following is a list of Treaties enacted between the US government and Native American Tribes in Indiana. Details of the treaties are available online through the University of Oklahoma’s Indian Affairs: Laws and Treaties webpage (digital.library.okstate.edu/kappler/VOL2/toc.htm)</p> <p>August 1795 – Treaty of Greenville June 1803 – Treaty of Fort Wayne August 1804 – Treaty of Vincennes August 1805 – Treaty of Grouseland September 1809 – Treaty of Fort Wayne (“Harrison’s Purchase”) September 1817 – Treaty with the Wyandots October 1818 – Treaty of St. Mary’s August 1821 – Treaty of Chicago October 1826 – Treaty of Mississinewa September 1828 – Treaty of Carey Mission October 1832 – Treaty of Tippecanoe October 1834 – Treaty with the Miami November 1838 – Treaty with the Miami November 1840 – Treaty with the Miami (final secession of native land in Indiana)</p> <p>Although none of the original Native American Nations’ landholdings remain in Indiana, the Division of Forestry recognizes that this does not preclude the existence of legal or customary rights. No legal or customary rights that would impact ICFCG tracts have yet been identified. If in the future such rights are identified, the Division of Forestry will work with the specific Native American nation to insure the protection of those rights.</p> <p>As stated in the Umbrella Plan, the IDNR has identified Native American nations that have expressed interests in Indiana. Several treaties have been enacted between the US government and Native American tribes in Indiana. The plan explains that “Although none of the original Native American Nations’ landholdings remain in Indiana, the Division of Forestry recognizes that this does not preclude the existence of legal or customary rights. No legal or customary rights that</p>

		would impact ICFCG tracts have yet been identified. If in the future such rights are identified, the Division of Forestry will work with the specific Native American nation to insure the protection of those rights” (pp 30-31).
3.2.b Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	See 3.2.a
3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	C	
3.3.a. The forest owner or manager invites consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance. <i>FF Indicator 3.3.a The forest owner or manager maintains a list of sites of current or traditional cultural, archeological, ecological, economic or religious significance that have been identified by state conservation agencies and tribal governments on the FMU or that could be impacted by management activities.</i>	C	Any sites of traditional cultural, archeological, ecological, economic or religious significance are maintained and regulated by the Division of Archaeology and Historic Preservation. Records are store in their database, State Historical Architectural and Archaeological Research Database (SHAARD). Before any major management activity such as a timber harvest, the IDNR forest archaeologist reviews for known sites and notifies the landowner of the FMU if a previously-recorded site is on the property.
3.3.b In consultation with tribal representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).	C	Any sites of traditional cultural, archeological, ecological, economic, or religious significance are maintained and regulated by the Division of Archaeology and Historic Preservation. As explained in the Umbrella Plan and confirmed via interviews with IDNR personnel, if sites of special significance are identified in the future, the IDNR will work with the specific Native American nation to development management recommendations appropriate for the level of detail provided.
3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.	NA	Traditional knowledge is not used by IDNR or group members, as confirmed in interviews with participants and observation of management practices.
Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	C	

<p>4.1.a Employee compensation and hiring practices meet or exceed the prevailing <i>local</i> norms within the forestry industry. FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>Group members typically contract foresters or work directly with loggers or mills, per interviews with group members and IDNR personnel. Contracts are aligned with the local prevailing market conditions.</p> <p>Employees of IDNR who implement this program are paid according to state agency salary scales use for Indiana. While not paid at the level of private forestry companies, IDNR personnel who were interviewed noted they had reasonably good benefits packages. Hiring practices for IDNR personnel is consistent with state hiring practices and are considered normal for state employees.</p>
<p>4.1.b Forest work is offered in ways that create high quality job opportunities for employees. FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>Group member typically contract foresters or work directly with loggers or mills. While the workload for many IDNR personnel in the Classified Program is heavy and had been for some time, recently the agency has been successful with securing grant money to support filling some vacancies.</p>
<p>4.1.c Forest workers are provided with fair wages. FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>Group members typically contract foresters or work directly with loggers or mills, per interviews with group members and IDNR personnel. These wages are aligned with the local prevailing market conditions.</p>
<p>4.1.d Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations. FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>Group members typically contract foresters or work directly with loggers or mills. The contracts reviewed by the audit team appear to meet applicable federal, state and local regulations. Discussions with stakeholders suggest that the contracts have been negotiated under non-discriminatory circumstances.</p> <p>IDNR personnel apply and are hired under the State of Indiana employee hiring process and is considered non-discriminatory. It is the policy of the State of Indiana to provide Equal Employment Opportunity to all employees and applicants for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, veteran’s status, and any other protected group.</p>
<p>4.1.e The forest owner or manager provides work opportunities to qualified local applicants and seeks opportunities for purchasing local goods and services of equal price and quality. FF Indicator 4.1.e: The forest owner or manager, as feasible, contributes to the local community.</p>	<p>C</p>	<p>The Classified Program contributions to local economies by encouraging long-term timber management on non-industrial private forests. Benefits to the community include work opportunities for professional foresters, timber buyers, loggers, sawmills, and other wood</p>

		<p>products businesses. Some group members allow third-parties to hunt or pass through their FMUs with permission.</p> <p>Most of the IDNR personnel who manage the Classified Program are either local or have been in Indiana for a number of years. As stated in Indicator 4.1.d, IDNR personnel apply and are hired under the State of Indiana employee hiring process and is considered non-discriminatory, which includes the location and background of the applicant.</p>
<p>4.1.f Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management. FF Indicator: Inapplicable (pertinent requirements incorporated into Indicator 4.1.e)</p>	<p>C</p>	<p>Some group members have actively embraced using their properties in the Classified Program to support improving public understanding of forests and forest management. For example, the owner at one site visited (Tract 54-0061, District 13, Montgomery County) is open to using his property as a tool for public education and has conducted tours with the land trust, DNR, and Purdue University professors.</p> <p>IDNR personnel interviewed exhibited a great deal of knowledge about the Classified Program, various forest resources in Indiana, and forest management. Several times during the audit, IDNR field foresters were observed interacting with group members, providing information that could help them to better understand and manage their properties. IDNR personnel are also members of local communities and, as such, serve as ambassadors for forestry and the Classified program.</p>
<p>4.1.g The forest owner or manager participates in local economic development and/or civic activities, based on scale of operation and where such opportunities are available. FF Indicator: Inapplicable (pertinent requirements incorporated into Indicator 4.1.e)</p>	<p>C</p>	<p>Group members and IDNR personnel are members of local communities, and many are involved in economic development and/or civic activities. For example, the owner at one site visited (Tract 54-0061, District 13, Montgomery County) is an active board member of a local land trust.</p>
<p>4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	<p>C</p>	
<p>4.2.a The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).</p>	<p>C</p>	<p>Most group members contract out consulting, logging, hauling, and other forest management activities to independent contractors, not employees. Contracts</p>

<p>FF Indicator: Low risk of negative social or environmental impact.</p>		<p>reviewed included requirements that health and safety laws must be followed.</p> <p>By following the State of Indiana laws governing employee health and safety, IDNR fulfills the requirements of this standard.</p>
<p>4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.</p>	C	<p>It was not possible to view active felling operations during the audit, however, a review of stumps from recently-felled trees indicated safe felling techniques, as did interviews with stakeholders. IDNR sample contracts, as well contracts for professional foresters reviewed during the audit included safety requirements.</p>
<p>4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan.</p> <p>FF Indicator: Low risk of negative social or environmental impact.</p>	C	<p>Service providers that are hired include licensed timber buyers, loggers, and professional foresters. Evaluation of on-the-ground conditions generally demonstrated professional. There were some instances of damage to residual trees, water bars that were not properly constructed, and in once case building a skid trail within 100-ft of a cemetery without a Cemetery Development Plan (see Finding 2019.3). However, these were the exceptions, and all in all the FME was found to be in conformance with this Indicator.</p>
<p>4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</p>	C	
<p>4.3.a Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.</p> <p>FF Indicator: Low risk of negative social or environmental impact.</p>	C	<p>The right for workers to freely associate and unionize is protected by US and Indiana law. ILO Convention 87 has been ratified by US Law. ILO Convention 98 does not apply to public sector workers. Under US Federal law and consistent with ILO 98, public sector employee rights are established by the US Congress for Federal employees and by state legislatures for state, county, and local public sector employees.</p>
<p>4.3.b The forest owner or manager has effective and culturally sensitive mechanisms to resolve disputes between workers and management.</p> <p>FF Indicator: Low risk of negative social or environmental impact.</p>	C	<p>Group members do not hire workers, but rather contract forest management and harvesting to third-party independent contractors.</p> <p>The IDNR has a mechanism for resolving disputes between state employees and management.</p>
<p>4.4. Management planning and operations shall incorporate the results of evaluations of social impact.</p>	C	

<p>Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.</p>		
<p>4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on:</p> <ul style="list-style-type: none"> • Archeological sites and sites of cultural, historical and community significance (on and off the FMU); • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. <p>A summary is available to the CB.</p> <p>FF Indicator 4.4.a The forest owner of manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations.</p>	<p>NC</p>	<p>On Tract 61-0658, where an active harvest with group openings had been completed in 2018 and reported to the forester post-harvest, the audit team discovered an unmapped cemetery near a skid trail. The skid trail was about 25 feet from the cemetery, and it was clear that it had been used for skidding logs. The trail was adjacent to a 0.25-acre harvest opening.</p> <p>Indiana Code 14-21-1 provides protection to archeological sites and cemeteries on private and public land by prohibiting ground disturbance within 100 feet of a cemetery without an approved plan from the IDNR-Division of Historic Preservation and Archeology (DHPA). In consultation with the DNR forest archeologist, the audit team determined that the landowner should have acquired a Cemetery Development Plan prior to conducting active skidding within 100 feet of the cemetery. No such Cemetery Development Plan was issued.</p> <p>A Minor CAR was issued (see Finding 2019.3).</p>
<p>4.4.b The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.</p> <p>FF Indicator: Low risk of negative social or environmental impact.</p>	<p>C</p>	<p>Audit team determined low risk of negative social or environmental impact given the small size of the FMUs.</p>
<p>4.4.c People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.</p>	<p>C</p>	<p>No adverse effects of management observed, as confirmed through field visits and stakeholder interviews.</p>
<p>4.4.d For public forests, consultation shall include the following components:</p> <ol style="list-style-type: none"> 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; 	<p>NA</p>	<p>No public forests are part of the program.</p>

<p>3. An accessible and affordable appeals process to planning decisions is available. Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p>		
<p>4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p>	C	
<p>4.5.a The forest owner or manager does not engage in negligent activities that cause damage to other people.</p>	C	<p>Group members demonstrate good understanding of property boundary location and negligent activities that could possibly arise with neighbors. During 2019 audit, no disputes or acts of negligence were detected.</p>
<p>4.5.b The forest owner or manager provides a known and accessible means for interested stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.</p>	C	<p>Group members reported good working relationships with Classified Program staff and neighbors</p> <p>IDNR maintains documentation related to any grievances and disputes in district and central offices. State of Indiana procedures and processes for addressing grievances and disputes provide a known and accessible means for interested stakeholders and employees to voice grievances and have them resolved.</p>
<p>4.5.c Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager. FF Indicator: Low risk of negative social or environmental impact</p>	C	<p>During 2019 audit, no examples of substantiated damage or loss of income were detected.</p>
<p>Principle #5: Forest management operations shall encourage the efficient use of the forest’s multiple products and services to ensure economic viability and a wide range of environmental and social benefits.</p>		
<p>5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.</p>	C	
<p>5.1.a The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.</p>	C	<p>No landowner was found to be undertaking harvests that were not financially viable – most landowners were waiting until the market was favorable or trees had to be salvaged due to drought or disease damage. Salvage harvests, although not</p>

		usually revenue generating, were generally undertaken with the future health of the stand in mind.
5.1.b Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.	C	Although landowners certainly try to time harvests to favorable timber markets, no harvests necessitated by financial factors were found to be in non-compliance with this standard. Very few landowners in the program were found to be heavily reliant on timber sales for income.
5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.		
5.2.a Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service. FF Indicator: Low risk of negative social or environmental impact	C	The DoF provides group participants with a compendium of forestry professionals in their area (consulting foresters, loggers, timber buyers, etc.) from which they may select individuals or companies to work with or to provide with bids for competitive rates.
5.2.b The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.	C	Numerous examples were noted during the audit of individual landowners trying to optimize marketable resources off their forestland. One owner was processing tops for sale to a pellet factory, another was exploring options for sales of chip to co-gen plants or brick factories.
5.2.c On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.	NA	
5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	C	
5.3.a Management practices are employed to minimize the loss and/or waste of harvested forest products.	C	Given the limited nature and low intensity of most harvests on participants’ lands, little waste generated. If anything, most timber buyers or loggers and consulting foresters tend to mark trees that might best be left for wildlife, as they have defect that will significantly reduce their value. The emphasis in the field is certainly to minimize waste and extract anything that might give value.
5.3.b Harvest practices are managed to protect residual trees and other forest resources, including: <ul style="list-style-type: none"> soil compaction, rutting and erosion are minimized; residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; 	C	The light touch of most operations seen during the field audit indicated very little residual stand damage – many harvests could not be located on the ground while walking the property, as even a year later the damage was insignificant at the level of the ownership. BMPs are generally followed and should a violation occur, operators are required to repair them. A few

<ul style="list-style-type: none"> • damage to NTFPs is minimized during management activities; and • techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible. 		<p>instances of repairs were noted during the field audit, though this did not rise to the level of a finding. Adherence to BMPs is audited annually by the DoF.</p>
<p>5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>	C	
<p>5.4.a The forest owner or manager demonstrates knowledge of their operation’s effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.</p>	C	<p>District foresters were well aware of the effects of landowners’ participation in the program on the local economy. Many landowners keep their woodlands as insurance and are able to reap profit on a 15 – 20-year time horizon. Most landowners are using forestland products to supplement other income and the industry supports a large number of contract foresters, logging crews, machinery operators and local mills.</p>
<p>5.4.b The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.</p>	C	<p>Many landowners are exploring innovative revenue sources from their forestland, including maple syrup production, carbon credits, hunting and fishing leases.</p>
<p>5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p>	C	
<p>5.5.a In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.</p>	C	<p>The Classified Forest & Wildlands Program, at large, is designed to serve the public of Indiana by encouraging and making possible the conservation and management of the state’s forestlands, for the general benefit of the public. Although the lands in the program are all privately owned, the ability to retain forest cover at the state level arguably benefits all citizens and serves numerous public values, including watershed protection, wildlife habitat, recreation and tourism, clean air and water and carbon sequestration.</p>
<p>5.5.b The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.</p>	C	<p>Many landowners express recreation and wildlife habitat as the main objective for managing their forestland and many make management decisions that will enhance those features of their property. Management for wildlife habitat in particular is popular and frequently expressed as the reason to maintain the forest resource.</p>
<p>5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p>	C	
<p>5.6.a In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.</p>	NA	

<p>The sustained yield harvest level calculation for each planning unit is based on:</p> <ul style="list-style-type: none"> • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. <p>The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.</p>																		
<p>FF Indicator 5.6.a On family forests, a sustained yield harvest level analysis shall be completed. Data used in the analysis may include but is not limited to:</p> <ul style="list-style-type: none"> - regional growth data; - age-class and species distributions; - stocking rates required to meet management objectives; - ecological and legal constraints; - empirical growth and regeneration data; and, - validated forest productivity models. 	C	<p>The DoF has initiated a state wide continuous forest inventory (CFI) system that will permit estimates of growth and removal across the Classified Forest & Wildlands Program as a whole. The third year of data collection is just being concluded. Once this data is analyzed, there will be trend data specific to classified forests available. Given the low priority of timber harvesting expressed by most landowners in the classified program, and the anticipated time and expense, individual, property level analysis is not justified, nor useful at this time. The data provided at the state level should provide sufficient assurance of trends on land within the classified program.</p>																
<p>5.6.b Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.</p>	NA																	
<p>FF Indicator 5.6.b. On family forests, harvest levels and rates do not exceed growth rates over successive harvests, contribute directly to achieving desired future conditions as defined in the forest management plans, and do not diminish the long term ecological integrity and productivity of the site.</p>	C	<p>In response to an observation during the 2013 audit, the DoF provided the table below, which is based on FIA data and measures growth and removal of all trees 5-inch dbh or greater in cubic feet. The data is listed by FIA Regions. The data shows that at the state level, there is far more growth than removal. This is likely particularly true on group participants' properties, where the emphasis is rarely on removals and most properties are not undergoing regular harvests. Even on state lands, where removal is more regular, harvests are approaching 60% of growth.</p> <table border="1" data-bbox="844 1743 1542 1890"> <thead> <tr> <th>UNIT</th> <th>GROWTH</th> <th>REMOVAL</th> <th>NET</th> </tr> </thead> <tbody> <tr> <td>North</td> <td>69,293,486</td> <td>7,404,432</td> <td>61,889,054</td> </tr> <tr> <td>Lower</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Wabash</td> <td>43,588,661</td> <td>23,710,321</td> <td>19,878,340</td> </tr> </tbody> </table>	UNIT	GROWTH	REMOVAL	NET	North	69,293,486	7,404,432	61,889,054	Lower				Wabash	43,588,661	23,710,321	19,878,340
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<p>5.6.c Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.</p>	C	<p>Almost every harvest visited during the field audit included removals for forest health reasons. High mortality of tulip poplar following the 2008 drought has led most landowners to salvage dying poplar where possible. Group participants are also removing mature ash in advance of the EAB. Removals of these two species alone is helping to reduce overstocked stands and salvage harvests improve forest health.</p>												
<p>5.6.d For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.</p>	NA	<p>No landowners were found to be collecting NTFPs at significant levels or for commercial operations.</p>												
<p>Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</p>														
<p>6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</p>	C													
<p>6.1.a Using the results of <i>credible scientific analysis, best available information</i> (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes: 1) Forest community types and development, size class and/or successional stages, and associated <i>natural disturbance regimes</i>; 2) <i>Rare, Threatened and Endangered (RTE) species</i> and <i>rare ecological communities</i> (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions;</p>	C	<p>Items 1-6 are included in the Stewardship Plan template. Verified by reviewing Stewardship Plans for properties visited during 2019 audit.</p>												

<p>5) Soil resources; and 6) Historic conditions on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions.</p>		
<p>6.1.b Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.</p> <p>The assessment must incorporate the best available information, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.</p>	<p>NC</p>	<p>See response to CAR 2018.2</p>
<p>6.1.c Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.</p>	<p>C</p>	<p>Review of harvest operations during 2019 audit indicated that impacts are being avoided or minimized. DoF District Foresters and trained consulting foresters are involved in preparing project plans in most cases. Sampled harvests, tree planting, invasive species control, mine waste remediation, and other practices demonstrated careful practices. The Classified Forest program includes an involuntary declassification procedure with a financial penalty as a deterrent to negative impacts. A 10% sample of Indiana Classified Forests (ICF) properties are inspected each year for BMP compliance and effectiveness monitoring. The BMP monitoring report for Classified lands can be found online.</p>
<p>6.1.d On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.</p>	<p>C</p>	<p>No public lands within the group.</p>
<p>6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of</p>	<p>C</p>	

<p>the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</p>		
<p>6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	<p>NA</p>	<p>Family Forest certificate, see FF 6.2.a, below.</p>
<p>FF Indicator 6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present. Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. A secondary review of the survey does not need to be included in the process. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	<p>C</p>	<p>Per DoF procedures, a Natural Heritage database search is completed when preparing management plans for each enrolled tract (called Stewardship Plans) and prior to a harvest when a District Forester (DF) is aware of the planned harvest. If the Natural Heritage database query indicates possible presence of forest dwelling RTE species, management occurs with the assumption that they are present. Auditors observed conformance with these procedures. Through interviews and file reviews, verified DF's are using appropriate resources to determine habitat needs of RTE species when Natural Heritage hits come up. Most of the Natural Heritage occurrences observed were riparian flora and fauna that are outside of timber harvest areas.</p>
<p>6.2.b When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Conservation zones and/or protected areas are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p>	<p>C</p>	<p>When any landowner Stewardship Plan is prepared, a check is done against the Natural Heritage Database. Most of the Natural Heritage occurrences observed were riparian flora and fauna that are outside of timber harvest areas. When occurrences are within forested areas, foresters use available resources and/or consult with DNR Wildlife or other DNR staff of appropriate expertise to get guidance on appropriate management modifications. RTE databases are maintained by the Division of Nature Preserves (DNP). This is the Natural Heritage Database against which requests are made for developing Stewardship Plans and revisions every 5-7 years.</p>
<p>6.2.c For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as</p>	<p>NA</p>	<p>All group members under the scope of this certificate have small, privately owned lands.</p>

<p>landscape level biodiversity conservation goals.</p>		
<p>6.2.d Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).</p>	<p>C</p>	<p>Hunting, fishing, and other activities are strictly controlled by the owners since all lands within the program are privately owned.</p>
<p>6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p>	<p>C</p>	
<p>6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented <i>successional</i> stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.</p>	<p>C</p>	<p>Early and late successional forest stages are under-represented the State of Indiana per DNR analysis of inventory and wildlife data. Via tax incentives, the Indiana Classified Forest Certified Group (ICFCG) encourages landowners to maintain land as forest. ICFCG contributes to moving forest to late successional because a significant percentage of group members do not harvest timber on their properties. However, the regeneration harvests necessary to create early successional habitat tend not to be a good fit in economic, ecological, or social terms given the small parcel size. Despite this challenge, ICFCG does encourage landowners to take steps to regenerate oak and other early successional types through Stewardship meetings, information brochures, and individual engagements by staff foresters. Small oak regeneration openings were observed on some of the harvested tracts visited during the 2019 audit.</p> <p>Cost share is available through federal programs to plant trees, create pollinator habitat, plant warm season grasses, conduct TSI, and carry out invasive control. A number of planting sites visited were planted under federal cost-share program, Conservation Reserve Program (CRP), funds. Additionally, many landowners plant hardwood species of commercial or special interest.</p>
<p>6.3.a.2 When a <i>rare ecological community</i> is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, <i>conservation zones</i> and/or <i>protected areas</i> are established where warranted.</p>	<p>C</p>	<p>Rare ecological communities are identified through the Natural Heritage database. When rare communities are identified for a property, District Foresters ensure this information is in the Forest Management Plan (Stewardship Plan) that protects that community. Other rare community types, which are not rare enough to be</p>

		<p>tracked in Natural Heritage database, are identified by District Foresters during property inspections. Given that most of silviculture on ICFCG group members is single tree selection, it is unlikely that rare community types would be damaged by logging.</p>
<p>6.3.a.3 When they are present, management maintains the area, structure, composition, and processes of all Type 1 and Type 2 old growth. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 	<p>C</p>	<p>The ICFCG Umbrella Plan includes a description of Old Growth Forests.</p> <p>ICFCG tracts are continuously assessed for the presence of HCVF, including old growth by District Foresters during regular tract reinspections and other property visits. Candidate areas will be submitted by the District Forester to the Group Manager who will determine if further evaluation is needed.</p>

<p>5. Conservation zones representative of old growth stands are established.</p> <p>6. Landscape level considerations are addressed.</p> <p>7. Rare species are protected.</p>		
<p>6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	<p>NA</p>	<p>FME only consists of SLIMF FMUs.</p>
<p>6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</p> <ul style="list-style-type: none"> a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent aquatic habitats; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem. 	<p>C</p>	<p>RMZ are protected through implementation of Indiana Logging and Forestry BMPs. Audit team observed good conformance with RMZ measures during 2019 audit.</p>
<p>Stand-scale Indicators</p> <p>6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	<p>C</p>	<p>Silviculture practices observed on ICFCG group members is generally consistent with maintaining plant species composition. ICFCG members manage for a diversity of species. Indiana has timber markets that utilize a diversity of species over time.</p>
<p>6.3.e When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. Native species suited to the site are normally selected for regeneration.</p>	<p>C</p>	<p>Artificial regeneration is not a standard practice in Indiana. Most forests are naturally regenerated. When plantings do occur, nearly all planting stock comes from the State of Indiana nurseries that use local seed of known provenance to grow trees. All plantings observed during the 2019 audit were in association with converting back old fields to forests, usually using CRP funds</p>
<p>6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:</p> <ul style="list-style-type: none"> a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and b) vertical and horizontal complexity. 	<p>C</p>	<p>The predominance of selection harvesting serves to maintain existing habitat components and stand structures similar to naturally occurring processes. Occasionally, small openings are used to encourage oak regeneration. Abundant snags, legacy trees, vertical and horizontal complexity were observed at all sites inspected during the 2019 audit. Retained trees from single tree selection, thinnings, and intermixed patch cuts produce</p>

<p>Trees selected for retention are generally representative of the dominant species found on the site.</p>		<p>tree species generally representative of dominant species found on sites and this was observed throughout.</p>
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>	<p>C</p>	<p>The ICFCG Umbrella Plan Green Tree Retention Policy (p. 16) outlines the recommendations when openings of 20 acres or larger are being created. Regeneration harvests greater than 20 acres are very uncommon on ICFCG properties. No regeneration harvests of this size were observed during the 2019 audit.</p>
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings. 	<p>NA</p>	<p>There are no size limits for the Lake States. ICFCG has not had the need to justify a departure to green tree retention requirements.</p>
<p>6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control invasive species, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 	<p>C</p>	<p>Interviews with ICFCG members, District Foresters, and consulting foresters showed a high level of awareness about invasive species. All management plans reviewed contained recommendation for treating invasive species, when they were present. Site visits included numerous properties where invasive species control projects were</p>

<p>2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread;</p> <p>3. eradication or control of established invasive populations when feasible: and,</p> <p>4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</p>		<p>occurring. Funding for invasive species control is available and widely used from Environmental Quality Incentive Program (EQIP).</p> <p>Sites and records reviewed in 2019 included invasive species chemical and mechanical treatment of bush honeysuckle, Japanese stilt grass, ailanthus, Japanese honeysuckle, garlic mustard, and autumn olive. Auditors reviewed property forest management plans and implementation during the 2019 audit. Every property visited had Stewardship Plans which were examined and confirmed to provide assessment and treatment recommendations to minimize invasive establishment, growth, and spread.</p>
<p>6.3.i In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>	<p>C</p>	<p>The Division of Forestry, Fire Management Program provides organizational, operational and technical support regarding wildland and prescribed fire management. Indiana Code 14-23-5-1 outlines the Division of Forestry’s fire responsibilities. The Division of Forestry assumes Wildland fire responsibilities on ICFCG properties. The Division usually fulfills this responsibility through Cooperative Agreements with local fire departments to provide initial attack on wildland fires.</p> <p>Discussion with District Foresters indicates that very little, if any, prescribed fire occurs in the northern districts.</p> <p>In 2019, 132 tracts reported using prescribed fire. Most of these prescribed fires are used on warm season grass area and not in the forest.</p>
<p>6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>	<p>NE</p>	
<p>FF Indicator 6.4.a For family forests, the forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the landscape (see Criterion 7.1). The consultation and assessment process may be more informal; however, on all FMUs, outstanding examples of</p>	<p>C</p>	<p>The Division of Forestry and the Division of Nature Preserves conducted a gap analysis of communities on managed/protected lands (nature preserves, state owned land, local government land, land trust properties, etc) by natural region. Communities by Natural Regions list was compared to Managed Areas by Community Type and Natural Region list.</p>

<p>common community types (e.g., common types with Natural Heritage viability rankings of A and B) are identified in the assessment to be protected or managed to maintain their conservation value.</p>		<p>The conclusion of the analysis was that there were four communities identified as valid gaps. The four gap communities are associated with four Classified Forest & Wildlands parcels.</p> <p>Of those, one was taken off as an RSA because the district forester and regional ecologist looked at the site and the area had been mined for peat in the distant past and the community no longer exists. The remaining three sites are no longer in the certified group. Currently there are no RSAs on lands in the Classified Program Certified Group.</p>
<p>6.4.c Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances:</p> <p>a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or</p> <p>b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated.</p>	<p>NA</p>	<p>Currently there are no RSAs on lands in the Classified Program Certified Group.</p>
<p>6.4.d The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.</p>	<p>C</p>	<p>At this time, there is no indication that any new gap communities are present on certified tracts. Interview with the Group Coordinator indicated awareness that the last RSA was conducted 10 years ago and that a new assessment is needed.</p>
<p>6.4.e Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.</p>	<p>NA</p>	<p>All forestland in the program is private.</p>
<p>6.5 Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</p>	<p>C</p>	
<p>6.5.a The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.</p>	<p>C</p>	<p>The Indiana DoF Logging and Forestry BMP field guide serves this purpose. The Indiana Department of</p>

		<p>Environmental Management (IDEM) also enforces regulations related to surface waters.</p> <p>Classified Forest Act (IC 6-1.1-6) - Requires landowners to sustain the watershed protection, timber production benefits of forest land, and wildlife habitat. Failure to comply can force removal from the program and tax penalties. The Indiana Flood Control Act (IC 14-28-1) applies to all streams with a watershed greater than one square mile (640 acres) and prohibits the placement of tree tops in stream channels and their floodways which may unduly restrict its flood carrying capacity. Additional federal, state, and local regulations may also apply (e.g. Federal Emergency Management Agency flood areas, local ordinances requiring either logging permits or posting of road bonds). See Known Regulations webpage.</p>
<p>6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.</p>	<p>C</p>	<p>The ICFCG Umbrella Plan states, “Forestry best management practices are required during management activities conducted on ICFCG lands and should be included as a requirement in logging contracts.” Third-party audits are conducted annually of a sample of harvest sites to assess adherence to BMPs. BMP monitoring results are available online. Site visits during the 2019 audit indicated adherence to the BMPs.</p>
<p>6.5.c Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed:</p> <ul style="list-style-type: none"> • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. 	<p>C</p>	<p>The ICFCG Umbrella Plan states, “Forestry best management practices are required during management activities conducted on ICFCG lands and should be included as a requirement in logging contracts.” Third-party audits are conducted annually of a sample of harvest sites to assess adherence to BMPs. BMP monitoring results are available online.</p> <p>Observations of all field sites inspected during 2019 audit were in conformance related to rutting guidelines.</p> <p>Site visits during the 2019 audit indicated adherence to the BMPs.</p>

<ul style="list-style-type: none"> • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. <p>Low impact equipment and technologies is used where appropriate.</p>		
<p>6.5.d The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; <p>unnneeded roads are closed and rehabilitated.</p>	C	<p>Due to the small size of the majority of the properties enrolled in the certified group, most properties have very few permanent roads through the forestland. Road density is not an issue and temporary skid trails are usually put in for harvests. Often, old skid trails are reused. Water bars were noted on all skid trails at incline.</p>
<p>6.5.e.1 In consultation with appropriate expertise, the forest owner or manager implements written Streamside Management Zone (SMZ) buffer management guidelines that are adequate for preventing environmental impact, and include</p>	C	<p>Management practices in buffer zone areas adjacent to water resources are addressed in the Indiana Logging and Forestry BMP field guide. RMZs observed on 2019 site visits verified BMPs are followed.</p>

<p>protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>		
<p>6.5.e.2 Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.</p>	<p>NA</p>	<p>No variations observed in field sites.</p>
<p>6.5.f Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of aquatic habitat. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p>	<p>C</p>	<p>BMPs identify crossings to be rehabilitated and natural hydrology restored when removed. Several examples of temporary crossings were noted during site visits, all of which had been properly closed out. Discussions with landowners and foresters indicated that crossings are minimized.</p>

<p>6.5.g Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.</p>	<p>C</p>	<p>As all tracts in the certified group are privately owned, recreation is strictly controlled. No damage due to recreational use was noted during the audit. Although many landowners operate ATVs on their property, no excessive road or trail damage was observed.</p>
<p>6.5.h Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.</p>	<p>C</p>	<p>Grazing is not permitted on lands under the Classified Forest & Wildlands Program. No unauthorized grazing was observed or reported by group members.</p>
<p>6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p>	<p>C</p>	
<p>6.6.a No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).</p>	<p>C</p>	<p>The entries on the Pesticides and Other Chemical Use List provided by the Certificate Holder (CH) were compared to the FSC-POL-30-001A EN FSC Lists of highly hazardous pesticides. This comparison showed that no Highly Hazardous Pesticides in the Prohibited or Highly Restricted were used.</p> <p>Two chemicals that fall into the Restricted category (Glyphosate and picloram) were used. Guidance for these two chemicals is the same and indicates that the HHP may continue to be used without a derogation or ESRA until August 1, 2020 and after that, additional requirements must be followed prior to use. Those requirements are that the FM must complete an ESRA prior to using the HHP as required in the revised Policy (FSC Pesticides Policy FSC-POL-30-001 V3-0 EN), incorporating any conditions from the most recently approved of any existing approved derogations in the country for the HHP, and (once available) incorporating the requirements from the most recent published draft of the relevant HHP-IGIs.</p>

		<p>CHs in this situation are encouraged to implement these requirements before 1 August 2020, but will not be audited to the requirements until their first scheduled audit after August 1, 2020.</p>
<p>6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical.</p> <p>Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.</p>	<p>NA</p>	<p>Family Forest certificate, see FF 6.6.b, below.</p>
<p>FF Indicator 6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical.</p>	<p>C</p>	<p>Most landowners in the certified group apply chemicals through the cost share program EQIP. The program requires a written application which contains a prescription for 3 years of invasive species control, describing all control methods (manual and chemical) and a monitoring schedule conducted by either NRCS or the DoF.</p> <p>Many landowners in the certified program have invasive species control recommended in their stewardship plans and there is extensive use of the EQIP cost share funds by group members. The program appears effective and control efforts visited during the audit were largely successful, within expected limits. Due to the three year</p>

<p>Written strategies are developed and implemented that justify the use of chemical pesticides. Family forest owners/managers may use brief and less technical written procedures for applying common over-the-counter products. Any observed misuse of these chemicals may be considered as violation of requirements in this Indicator. Whenever feasible, an eventual phase-out of chemical use is included in the strategy.</p>		<p>window on funding, a phase out of chemical use is anticipated in most cases.</p>
<p>6.6.c Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.</p>	<p>C</p>	<p>Explicit selection of the chemical and application method are components of the EQIP cost share application and monitoring. Most applications are foliar or applied to the cut stem. No instances of aerial spraying were observed on site visits.</p>
<p>6.6.d Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.</p>	<p>C</p>	<p>The requirements regarding written prescriptions for chemical use are met through the application required by the EQIP program. Most chemical applications are done by licensed applicators hired under contract.</p>
<p>6.6.e If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.</p>	<p>C</p>	<p>Effectiveness of chemical treatments is required through the EQIP program and records are maintained as a component of the application, prescription, and monitoring forms.</p>
<p>6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</p>	<p>C</p>	
<p>6.7.a The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills</p>	<p>C</p>	<p>No evidence of spills was observed on group member FMUs. District foresters demonstrated knowledge of spill incident procedures and clean-up practices. District</p>

		Foresters and state forestry consultants attend commercial pesticide applicator training.
6.7.b In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.	C	No evidence of spills was observed on group member FMUs. The Indiana Logging and Forestry BMPs include guidance on spill prevention, clean up, and reporting. Contractors must perform removal and remediation as described in OSHA decrees.
6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.	C	Contractors are in FMUs for short periods due to the small size of most FMUs. Fuels and chemicals are typically stored in or near vehicles away from sensitive features. No evidence of recent spills was observed on group member FMUs and no foresters interviewed reported spills.
6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.	C	
6.8.a Use of <i>biological control agents</i> are used only as part of a pest management strategy for the control of invasive plants, <i>pathogens</i> , insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species.	C	Indiana DNR has well qualified experts who direct the control of invasive plants. Use of biological control agents has not been widespread, except for the control of gypsy moth, where the policy is to use only <i>Bacillus thuringiensis</i> , a well-researched and often used treatment.
6.8.b If biological control agents are used, they are applied by trained workers using proper equipment.	C	Use of biological controls in Indiana is overseen by USDA APHIS and the Office of Indiana State Chemist - Pesticide Section.
6.8.c If biological control agents are used, their use shall be documented, monitored and strictly controlled in accordance with state and national laws and internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.	C	Use of biological controls in Indiana is overseen by USDA APHIS and the Office of Indiana State Chemist - Pesticide Section.

<p>6.8.d Genetically Modified Organisms (GMOs) are not used for any purpose</p>	<p>C</p>	<p>Other than use of GMO crops in agricultural fields (which are ineligible for enrollment as Classified Forests), no forest-related GMOs are used in Indiana.</p>
<p>6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</p>	<p>C</p>	
<p>6.9.a The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.</p>	<p>C</p>	<p>The Umbrella Management plan includes planting and seeding recommendations. The document presents abundant cautions for seed mixes and nursery stock, especially non-woody plants used to stabilize bare soils and for food plots for wildlife. Exotic species are used almost exclusively for erosion control or as food for wildlife, with care taken to prevent invasive species. Red and white pine, not normally present in Indiana hardwood forests, are produced by the state nursery and used primarily for planting old field and mine reclamation sites.</p>
<p>6.9.b If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.</p>	<p>C</p>	<p>White pine, red pine, and black locust come from adjacent states or the few sites in the state where these species naturally occur. Most of the pine planted on private forestland in Indiana comes from the state nursery, which maintains documentation on a given species’ provenance. Indiana DNR cooperates with Purdue University on monitoring of planting and forest improvement programs.</p>
<p>6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species</p>	<p>C</p>	<p>Exotic species currently in use for commercial and management purposes pose few risks for adverse impacts. Observed exemplary efforts at many group member properties at identifying and controlling invasive species.</p>
<p>6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</p>	<p>C</p>	
<p>6.10.a Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and</p>	<p>C</p>	<p>The ICFCG Umbrella Plan chapter “Enforcement & Withdrawal from Group” addresses the FSC requirements.</p>

<p>c are related and all need to be conformed with for conversion to be allowed).</p>		
<p>6.10.b Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>C</p>	<p>Any conversion occurs under a special permit so would be considered and approved by the DF who would know if the tract is an HCVF. Group Umbrella Plan chapter on “Special Management Areas: Communities In Most Need of Protection” addresses the FSC requirements.</p>
<p>6.10.c Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>C</p>	<p>In most cases, conversions where the land remains in the program, are for wildlife openings or water ponds. DoF will assess other conversions that may not meet 6.10.c on a case-by-case basis. Conversions that are inconsistent with these requirements may result in the withdrawal of the land from the Classified Forest & Wildlands Program.</p>
<p>6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.</p>	<p>C</p>	<p>This requirement has been explained to ICFCG members through newsletters and meetings.</p>
<p>6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.I)</p>	<p>C</p>	<p>One of the core objectives of ICF is to keep land forested and avoid conversion to non-forest use. Candidate areas for conversions must be submitted to DoF via CF&W special permit. DoF will review these conversions to ensure that they are consistent with 6.10.e. If a conversion occurs it will be documented in the Stewardship Plan.</p>
<p>6.10.f Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.</p>	<p>C</p>	<p>Candidate areas for conversions must be submitted to DoF via CF&W Special Permit. DoF will review these conversions to ensure that they are consistent with 6.10.f requirements.</p>
<p>Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</p>		

<p>7.1. The management plan and supporting documents shall provide:</p> <p>a. Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</p> <p>b. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories. d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.</p> <p>b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</p> <p>i) Description and justification of harvesting techniques and equipment to be used.</p>	<p>C</p>	
<p>7.1.a The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.</p>	<p>NA</p>	<p>Family Forest certificate, see FF 7.1.a, below.</p>
<p>FF Indicator 7.1.a A written management plan exists for the property or properties for which certification is being sought. The management plan includes the following components:</p> <p>i. Management objectives (ecological, silvicultural, social, and economic) and duration of the plan. Guidance: Objectives relate to the goals expressed by the landowner within the constraints of site capability and the best available data on ecological, silvicultural, social and economic conditions.</p> <p>ii. Quantitative and qualitative description of the forest resources to be managed, including at minimum stand-level descriptions of the land cover, including species and size/age class and referencing inventory information. Guidance: In addition to stand-level descriptions of the land cover, information in site-level plans may include: landscape within which the forest</p>	<p>C</p>	<p>The overall forest management plan (FMP) for any ICFCG member is comprised of several documents and tools available to District Foresters and landowners. The three main FMP documents are: Classified Forest & Wildlands Procedures Manual (CFWPM) dated 2006 and is currently under revision, which is a procedural manual for management of Classified members; Indiana Classified Forest Certified Group: UMBRELLA MANAGEMENT PLAN(UMP) dated October 2019, which includes several items that demonstrate conformance to FSC requirements at the group level specific to Classified lands that are also part of the Certified Group, as well as describing group member eligibility and division of responsibilities; and the individual landowner Stewardship Plans (SP), which serves as the FMU-specific FMP for individual group members.</p> <p>These three core documents are supplemented by information in the Indiana Forest Resource Management</p>

<p>is located; landscape-level considerations; past land uses of the forest; legal history and current status; socio-economic conditions; cultural, tribal and customary use issues and other relevant details that explain or justify management prescriptions.</p> <p>iii. Description of silvicultural and/or other management system, prescriptions, rationale, and typical harvest systems (if applicable) that will be used.</p> <p>iv. Description of harvest limits (consistent with Criterion 5.6) and species selection. Also, description of the documentation considered from the options listed in Criterion 5.6 if the FMU does not have a calculated annual harvest rate.</p> <p>v. Description of environmental assessment and safeguards based on the assessment, including approaches to: (1) pest and weed management, (2) fire management, and (3) protection of riparian management zones; (4) protection of representative samples of existing ecosystems (see Criterion 6.4) and management of High Conservation Value Forests (see Principle 9).</p> <p>Guidance: Regional environmental assessments and safeguards or strategies to address pest and weed management, fire management, protection of rare, threatened, and endangered species and plant community types, protection of riparian management zones, and protecting representative samples of ecosystems and High Conservation Value Forests may be developed by state conservation agencies. Site specific plans for family forests should be consistent with such guidance and may reference those works for clarity.</p> <p>vi. Description of location and protection of rare, threatened, and endangered species and plant community types.</p> <p>vii. Description of procedures to monitor the forest, including forest growth and dynamics, and other components as outlined in Principle 8.</p>	<p>System (INFRMS) database and electronic files, GIS, Natural Heritage Database search results, Archeological check documentation, timber sale contracts, annual report for each property, and Indiana Logging and Forestry Best Management Practices – 2005 BMP Field Guide.</p> <p>Additional information available to group members include Indiana Department of Forestry publications and websites, such as the Indiana Forestry Exchange.</p> <p>i. Management objectives for the group level and group member level are contained in the Introduction and Management Objectives section of the UMP (p. 13). This includes ecological, silvicultural (referred to as Desired Future Conditions), social, and economic objectives. Specific group member level objectives are included on the first page of each group member’s SMP, as well as the Area Description & Management Recommendations section.</p> <p>ii. The UMP contains a description of the State of Indiana’s forest resources (p. 9-11), including historical and present day forest cover as a percentage of land cover type. Inventory data references the US Forest Service’s Forest Inventory and Analysis (FIA) data. Forest types classified by dominant species were determined through use of the FIA EVALIDATOR 4.0 tool and FIA data. The Property Overview and Area Description & Management Recommendations sections of the Stewardship Plans contain specific information on species and size/ age class at the stand level for each group member FMU. DoF reports that landowners usually list timber production and harvesting as a low priority. Therefore, the district foresters don’t emphasize inventories or other quantitative data collection unless the landowner expresses an interest in timber management. DoF initiated a system wide continuous forest inventory (CFI) that will allow them to estimate growths and removals on a Classified Forest & Wildland wide basis. Once these data are analyzed, DNR will have trend data specific to classified forests.</p>
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<p>viii. Maps represent property boundaries, use rights, land cover types, significant hydrologic features, roads, adjoining land use, and protected areas in a manner that clearly relates to the forest description and management prescriptions.</p> <p>Guidance: Property level maps for family forests may be simple and efficient to produce, and may cover only the necessary information needed for management to the FSC-US Family Forest Standard. At the group level, if GIS is used coverage should include protected areas, planned management activities, land ownership, property boundaries, roads, timber production areas, forest types by age class, topography, soils, cultural and customary use areas, locations of natural communities, habitats of species referred to in Criterion 6.2, riparian zones and analysis capabilities to help identify High Conservation Value Forests. Group managers may rely on state conservation agencies for complex GIS services.</p>	<p>iii. Typical silvicultural systems and their rationale are described in the UMP (p. 14-16). Special management considerations and other management considerations are also in the UMP (p. 17-18). Harvest systems are described in the Harvest Equipment section of the UMP (p.18-19).</p> <p>iv and vii. Species selection based on ecological guild (e.g., shade tolerance, conifer vs. hardwood) is covered in the UMP in both the Forest Types (p. 10-11) Forest Growth & Dynamics Monitoring (p. 19-20) sections. ICF relies on FIA data to establish sustainable harvest rates and to monitor forest growth and dynamics. The volumes and growth rates are included on p. 11 for ICF as a whole. The Resource Description section of the SP is where FMU-specific inventory information would be documented for individual group members. ICF supplements the FIA program with Continuous Forest Inventory (CFI). Five regions to sample on ICF group member FMUs have been selected. At the group member level, the establishment of an inventory system depends on the size of the tract and the intensity of management (p. 19-20 of UMP). Monitoring of growth on small tracts will be based on qualitative factors due to the light intensity of management. Other monitoring protocols are described in the UMP, including: Monitoring of BMPs (p.23), Game Species (p. 28), and nongame species (p. 28-29), cultural resources (p. 31), pests and invasive species (p. 31-33), Integrated Pest Management (p. 34), and use of non-native species (p.34). The ICFCG contains monitoring protocols for monitoring of group member FMUs.</p> <p>vi. At the group level, ICF uses the Indiana DNR, Division of Nature Preserves' Natural Heritage Database to assess for the presence of RTE species on group member FMUs (see p. 29 of UMP). In the SP, RTE species and sensitive habitats would be described in the Sensitive Area/Species Protection and Management section.</p> <p>viii. A map of the FMU is included as part of the SP. Group members may also access mapping resources (e.g., NRCS soil mapper) via the Indiana Forestry Exchange Website. ICF also maintains several maps at the state, district, and FMU level that show water courses, land cover, roads, property boundaries, protected areas, etc.).</p>
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<p>7.1.b The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).</p>	<p>NA</p>	<p>Family Forest certificate, see FF 7.1.b, below.</p>
<p>FF Indicator 7.1.b Actions undertaken on the FMU are consistent with the management plan and help to achieve the stated goals and objectives of the plan.</p>	<p>C</p>	<p>DoF continues to work with federal partners to find funding to incentivize landowners to implement more management activities. Young Forests Initiative is a grant cost share program to make openings for younger age classes. Landowners will receive payments for making openings. The FSC indicator requires that, “Actions undertaken on the FMU are consistent with the management plan and help to achieve the stated goals and objectives of the plan.” During the 2019 site visits, all of the implemented practices observed by the auditor (harvests, TSI, invasive species control, etc.) were included in the forest management plans.</p>
<p>7.1.c The management plan describes: a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions. FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	<p>NA</p>	<p>All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>
<p>7.1.d The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed. FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	<p>NA</p>	<p>All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>
<p>7.1.e The management plan includes a description of the following resources and outlines activities to conserve and/or protect:</p> <ul style="list-style-type: none"> • rare, threatened, or endangered species and natural communities (see Criterion 6.2); • plant species and community diversity and wildlife habitats (see Criterion 6.3); • water resources (see Criterion 6.5); • soil resources (see Criterion 6.3); • Representative Sample Areas (see Criterion 6.4); 	<p>NA</p>	<p>All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>

<ul style="list-style-type: none"> • High Conservation Value Forests (see Principle 9); • Other special management areas. <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>		
<p>7.1.f If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).</p> <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	All requirements have been incorporated into Family Forest Indicator 7.1.a.
<p>7.1.g The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).</p> <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	All requirements have been incorporated into Family Forest Indicator 7.1.a.
<p>7.1.h If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6.</p> <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	All requirements have been incorporated into Family Forest Indicator 7.1.a.
<p>7.1.i If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.</p> <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	All requirements have been incorporated into Family Forest Indicator 7.1.a.
<p>7.1.j The management plan incorporates the results of the evaluation of social impacts, including:</p> <ul style="list-style-type: none"> • traditional cultural resources and rights of use (see Criterion 2.1); • potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); • management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5); • management of aesthetic values (see Indicator 4.4.a); • public access to and use of the forest, and other recreation issues; • local and regional socioeconomic conditions and 	NA	All requirements have been incorporated into Family Forest Indicator 7.1.a.

<p>economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g).</p> <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>		
<p>7.1.k The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).</p> <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	All requirements have been incorporated into Family Forest Indicator 7.1.a.
<p>7.1.l The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.</p> <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	All requirements have been incorporated into Family Forest Indicator 7.1.a.
<p>7.1.m The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.</p> <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	All requirements have been incorporated into Family Forest Indicator 7.1.a.
<p>7.1.n The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.</p> <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	All requirements have been incorporated into Family Forest Indicator 7.1.a.
<p>7.1.o The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.</p> <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	NA	All requirements have been incorporated into Family Forest Indicator 7.1.a.
<p>7.1.p The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.</p>	NA	All requirements have been incorporated into Family Forest Indicator 7.1.a.

<p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>		
<p>7.1.q Plans for harvesting and other significant site-disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, any necessary environmental safeguards, health and safety measures, and include maps of adequate detail.</p> <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	<p>NA</p>	<p>All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>
<p>7.1.r The management plan describes the stakeholder consultation process.</p> <p>FF Indicator: Inapplicable. All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>	<p>NA</p>	<p>All requirements have been incorporated into Family Forest Indicator 7.1.a.</p>
<p>7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.</p>	<p>C</p>	
<p>7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.</p>	<p>C</p>	<p>The most recent version of the Umbrella Management Plan (UMP) was modified this past year. Information on tree retention, invasive species, and endangered or threatened species (such as bats) are included in recent revisions. Stewardship Plans are updated every 5-7 years. ICFCG’s management planning documents are up-to-date with the requirements of the FSC US standard.</p>
<p>7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</p>	<p>C</p>	
<p>7.3.a Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.</p>	<p>C</p>	<p>Training records were inspected for most of the District Forester for Districts inspected during 2019 audit using the INFRMS database at the offices visited. Trainings included classes, conferences, internal and external trainings, and field days. These included trainings such as Society of American Foresters professional conference, technical meetings, internal trainings related to forestry operations, and other relevant topic areas. DoF demonstrated commitment to ongoing training in support of staff.</p>

		The Division of Forestry has implemented a certification training program for professional foresters. The training reviews Indiana Classified Forest Certified Group policies such as management plans, legacy trees, wildlife trees, BMPs, rutting guidelines, chemical use, shares sales, reporting and conducting a pre-harvest conference.
7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	C	
7.4.a While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	C	The UMP is available on the Indiana Department of Forestry website. The SP template is available upon request from DNR staff. Other management planning documents are available upon request. These contain the primary elements of C7.1.
7.4.b Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.	NA	ICFCG does not have any group members with public FMUs.
Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.		
8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	C	
8.1.a Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.	C	
FF Indicator 8.1.a For Family Forests, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol. Monitoring may be scaled to the size and intensity of the management operations that affect the resources identified in C8.2.	C	Section "Forest Growth & Dynamics Monitoring" in the group plan describes group manager and group member monitoring roles. In addition to FIA & CFI plot establishment and monitoring, DoF conducts regular BMP monitoring on 10% of reported harvest sites annually. All parcels in the Classified Forest & Wildlands Program are visited and reviewed every five - seven years by a District Forester. Group members are responsible for informal, qualitative monitoring of forest conditions.

<p>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</p>	<p>C</p>	
<p>8.2.a.1 For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.</p>	<p>C</p>	<p>Indiana uses FIA and CFI (continuous forest inventory) to monitor the classified system as a whole.</p>
<p>8.2.a.2 Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p>	<p>C</p>	<p>Monitoring of unanticipated loss occurs through:</p> <ul style="list-style-type: none"> • Indiana DoF Forest Health Surveys (aerial surveys) • Landowner identification resulting in visit from District Forester or consultant. • Forest inventory prior to and following harvest activities • Unanticipated removal (i.e., timber theft) is uncommon and thus only monitored passively.
<p>8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.</p>	<p>C</p>	<p>Annual reports collected by DoF from each landowner in the program collect harvest data, including number of trees harvested, bd ft volume, and species. Although landowners do not always provide the information, an adequate system is in place to monitor annual removals.</p> <p>The Group Manager, DNR, reported 24 MMBF (estimated) volume of product harvested in 2017 for the 2018 audit from “green certified” lands.</p>
<p>8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <ol style="list-style-type: none"> 1) Rare, threatened and endangered species and/or their habitats; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4). 	<p>C</p>	<ul style="list-style-type: none"> • DoF periodically monitors habitat conditions for all plants and animals as part of its periodic inventory of forest stand types and stocking levels. • The location and status of invasive species is routinely monitored by field foresters. • DoF works with the Division of Nature Preserves to monitor the condition of protected areas and set-asides. <p>District foresters monitor classified lands during classified reinspections.</p>
<p>8.2.d.1 Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p>	<p>C</p>	<p>Such monitoring occurs and is described in the DoF Classified Forest & Wildlands Procedures Manual and the Group Umbrella Plan. A sample of 10% of harvest sites are monitored for BMP impacts annually. All harvest sites are subject to close-out inspections.</p>

8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	Such monitoring occurs and is described in the DoF Classified Forest & Wildlands Procedure Manual and the Group Umbrella Plan.
8.2.d.3 The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	C	Addressed in the Indiana Statewide Forest Assessment & Strategy .
8.2.d.4 Stakeholder responses to management activities are monitored and recorded as necessary.	C	See Family Forest applicability note and DoF determination of NA.
8.2.d.5 Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	Archeological reviews continue prior to timber harvests.
8.2.e The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	Timber management activities on non-industrial properties are structured and monitored to ensure revenue is sufficient to pay for the logging costs and the consulting forester. Since harvests typically only occur every 15-20 years, there is little opportunity to assess productivity and efficiency of management on any regular basis. Land owners use simple cost-benefit calculations to determine efficiency of their overall management choices (i.e., enroll in Classified Forests and manage for timber products).
8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	C	
8.3.a When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	See COC indicators for FMEs.
8.3.b The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	See COC indicators for FMEs.
8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.	C	
8.4.a The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as	C	Addressed during and following harvest, during 5-year re-inspection as needed, and at 10-year plan re-write. All DF's are

<p>significant deviations from the plan.</p>		<p>provided with tablet computers and access to centralized planning database to facilitate plan updates. Statewide BMP monitoring on CWP parcels helps assess how well BMPs are being implemented generally across the State on ICFCG members.</p>
<p>8.4.b Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.</p>	<p>C</p>	<p>Occurs through 5-year re-inspections and post-harvest monitoring. When management activities deviate from the plan, DF's follow-up with recommended and/or mandatory actions to ensure the trajectory of the property is aligned to management objectives.</p>
<p>8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</p>	<p>C</p>	
<p>8.5.a While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.</p>	<p>C</p>	<p>See criteria 8.2</p>
<p>Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</p> <p>High Conservation Value Forests are those that possess one or more of the following attributes:</p> <ul style="list-style-type: none"> a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance b) Forest areas that are in or contain rare, threatened or endangered ecosystems c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control) d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities). 		
<p>9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p>	<p>C</p>	
<p>9.1.a The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a</p>	<p>C</p>	<p>The DNR Umbrella Plan provides a general list of the HCVF categories and community types that to be considered as HCVF if found in the field, as well as continuous assessment procedures by District Foresters</p>

<p>manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.</p>		<p>during mandatory tract inspections at least once every 5-7 years. Current list of assessed HCVF include adjacency and nearby attributes as determined by consultation with a number of resources, but primarily databases, is maintained by the Division of Nature Preserves. The 2016 HCVF assessment report is available online. Those attributes determined as defining the adjacent or included HCVF are included in the mapping, and those attributes are included in the property Stewardship Plan although not explicitly identified as HCVF.</p> <p>The evaluation thus far has identified primarily HCVs 1-3 on and adjacent to ICFCG member properties. However, this may have resulted in over-classification given the specific concentration of values required for HCV 1 (i.e., concentration of biodiversity values) and HCV 2 (i.e., viable populations of most if not all naturally occurring species in natural patterns of distribution and abundance). The HCV 3 used existing data sources and appear to provide an accurate identification of these values. For HCV 4, interviews with group members may be necessary as the most likely HCV of this type would be direct domestic or irrigation water supply (i.e., a stream that a home draws from directly for its water supply).</p>
<p>9.1.b In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.</p>	<p>NA</p>	<p>Family Forest certificate, see FF 9.1.b, below.</p>
<p>FF Indicator 9.1.b In developing the assessment, the forest owner or manager consults with databases, qualified experts, and/or best available research and literature.</p>	<p>C</p>	<p>The DoF, as manager of the group certificate, consulted with Nature Preserves, The Nature Conservancy (TNC), and other experts for identifying their current list of HCVF. The DoF has identified HCVF in and adjacent to ICFCG member parcels. The Division Nature Preserves (DNP) of the DNR is independent of the Forestry Division. The Division of Nature Preserves maintains RTE databases and related databases as well as public information. In developing the HCVF assessment, DoF used several GIS layers in analyses, including the state natural heritage database for S1 and S2 communities and staff wildlife biologists. The GIS layers maintained and provided included data from past surveys, qualified external</p>

		experts, internal experts; and ground-truthing and surveys as determined necessary. The Indiana Classified Forest Certified Group High Conservation Value Forest Assessment & Management Summary is available online .
9.1.c A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.	C	The Indiana Classified Forest Certified Group High Conservation Value Forest Assessment & Management Summary is available online . A summary of ecological communities or habitat types identified as HCVF, as well as a process for identifying these HCVF features on land as it is added to the certified group, is described in the Umbrella Plan, p.35-38.
9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	C	
9.2.a The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.	C	Appropriate consultations have been conducted confirming that HCVF locations and attributes have been accurately identified and appropriate options for maintenance of HCV attributes have been adopted using combined information in the Umbrella Plan, individual Stewardship Plans, and ongoing guidance in collaboration with staff from the Nature Preserves Division; and in consultation, for certain properties, with TNC. TNC collaborative properties have forest management plans developed and maintained by TNC. Many of the Nature Preserves are either TNC or other land trusts. Nature Preserves conducts their own maintenance of HCVFs in DNR adjacent lands. For HCV 3 sites District Foresters may contact Nature Preserves, and invite regional ecologist on field site with them.
9.2.b On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.	NA	All lands in the program are private.
9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.	C	
9.3.a The management plan and relevant operational plans describe the measures necessary to ensure the	OBS	The Umbrella Plan describes general categories and measures for HCV management. Individual property

<p>maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.</p>		<p>management plans, developed by District Foresters or private consultants include values and attributes that complement those used for designation of HCVF areas. Property management plans include protective measures for identified attributes and values for conservation. Although the information regarding HCVF status on a tract is readily available in INFMS database, the HCV feature was not indicated in two of the Stewardship Plans for tracts that contain HCVs. In both cases the Stewardship Plan was developed prior to the 2016 HCVF Assessment. A tract with an HCV that had a Stewardship Plan developed in 2017 (after the HCVF Assessment) did contain the information regarding the HCV feature and risk avoidance measures. <i>See OBS.</i></p>
<p>9.3.b All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.</p>	<p>C</p>	<p>As described in the Umbrella Plan and the Indiana Classified Forest Certified Group High Conservation Value Forest Assessment & Management Summary, all management activities described for HCVF should ensure their maintenance.</p> <p>Field sites with, or near HCVF were visited in 2019. All activities were consistent with maintaining or enhancing the defining attributes.</p>
<p>9.3.c If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.</p>	<p>C</p>	<p>The majority of properties in the certified group are small and tend to be isolated forest fragments, often bordered by roads or agricultural fields. Forested tracks in agricultural dominated landscapes, have multiple classified tracts within the identified forest management area.</p>
<p>9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</p>	<p>C</p>	
<p>9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.</p> <p>FF Indicator: Low risk of negative social or environmental impact for private family forests. Public lands must follow the requirements in Indicator 9.4.a.</p>	<p>C</p>	<p>No evidence of non-conformance was noted in the field. Nature Preserves are monitored annually by Regional Ecologist with the Division of Nature Preserves. District foresters informally monitor for these features during Classified re-inspections.</p>

<p>9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.</p>	<p>C</p>	<p>No HCVF sites were noted for increased risk during the field audit. Should any increased risk be determined for any identified HCVF, interviews confirmed that DoF staff is aware of the requirements. This would be examined during the mandatory 5-7 year review by the forester, or during landowner communications of issues, or any issues that require a field visit. During each 5-7 year inspection cycle foresters check the database for HCVF. Interviews with District Foresters confirm knowledge of these procedures. In addition, Nature Preserves (HCVF I) are monitored annually by Regional Ecologist with the Division of Nature Preserves.</p>
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Appendix 7 – Chain of Custody Indicators for FMEs Conformance Table

REQUIREMENT	C/ NC	COMMENT/CAR
1. Quality Management		
<p>1.1 The FME shall appoint a management representative as having overall responsibility and authority for the organization’s compliance with all applicable requirements of this standard.</p>	<p>C</p>	<p>Brenda Huter, Forest Stewardship Coordinator, is identified in this role in program documents.</p>
<p>1.2 A system shall be implemented to track and trace all products that are sold with an FSC Claim. For group and multiple FMU certificates, this system shall also be documented.</p>	<p>C</p>	<p>Group Umbrella Plan, section starting on page 20 titled “Marketing of Forest Products” requires retention of records for five or more years.</p>
<p>1.3 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.</p>	<p>C</p>	<p>Records are maintained a minimum of 5 years as confirmed in Umbrella Plan, interviews, and inspection of group management records.</p>
<p>1.4 The FME shall define its forest gate(s) (check all that apply): <i>The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.</i></p>	<p>C</p>	<p><input checked="" type="checkbox"/> Stump <i>Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs <u>upon</u> harvest.</i></p> <p><input type="checkbox"/> On-site concentration yard <i>Transfer of ownership of certified-product occurs at concentration yard under control of FME.</i></p> <p><input checked="" type="checkbox"/> Off-site Mill/ Log Yard/ Port <i>Transfer of ownership occurs when certified-product is unloaded or paid for at purchaser’s facility or a facility under the purchaser’s control.</i></p> <p><input type="checkbox"/> Auction house/ Brokerage</p>

		<p><i>Transfer of ownership occurs at a government-run or private auction house/ brokerage.</i></p> <p><input checked="" type="checkbox"/> Lump-sum sale/ Per Unit/ Pre-Paid Agreement <i>A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for <u>before</u> harvesting begins. Similar to a per-unit sale.</i></p> <p><input checked="" type="checkbox"/> Log landing <i>Transfer of ownership of certified-product occurs at landing/yarding areas.</i></p> <p><input type="checkbox"/> Other (Please describe):</p>
1.5 The FME shall have sufficient control over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.	C	Group Umbrella Plan, section starting on page 20 titled “Marketing of Forest Products”.
1.6 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements. <i>NOTE: This does not apply to log cutting or de-barking units, small portable sawmills or on-site processing of chips/biomass originating from the FMU under evaluation.</i>	C	Group Umbrella Plan, section starting on page 20 titled “Marketing of Forest Products”.
1.7 The FME has supported transaction verification conducted by SCS and Accreditation Services International (ASI) by providing samples of FSC transaction data as requested by SCS. <i>NOTE: Pricing information is not within the scope of transaction verification data disclosure.</i>	X	N/A, no verification requested
2. Product Control, Sales and Delivery		
2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).	C	All timber sales sold as certified visited during the audit had trip tickets identifying each load as certified, with the code and claim.
2.2 Information about all products sold shall be compiled and documented for all FMUs in the scope of certification, including: 1) Common and scientific species name; 2) Product name or description; 3) Volume (or quantity) of product; 4) Information to trace the material to the source of origin harvest block; 5) Harvest date;	C	Inspection of timber sales documents and log ticket books confirmed items 1-7 are completed. Summaries of this information was provided to the audit team.

<p>6) If basic processing activities take place in the forest, the date and volume/quantity produced; and</p> <p>7) Whether or not the material was sold with an FSC Claim.</p>		
<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <ul style="list-style-type: none"> a) name and contact details of the FME; b) information to identify the customer, such as their name and address; c) date when the document was issued; d) product name or description, including common and scientific species name(s); e) quantity of products sold; f) the FME’s FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code; g) clear indication of the FSC claim for each product item or the total products as follows: <ul style="list-style-type: none"> i. the claim “FSC 100%” for products from FSC 100% product groups; or ii. the claim “FSC Controlled Wood” for products from FSC Controlled Wood product groups. 	<p>C</p>	<p>Group Umbrella Plan, section starting on page 20 titled “Marketing of Forest Products” includes relevant instructions. Trip tickets for certified sales checked on site during the audit were found to be in conformance.</p>
<p>2.4 If the sales documentation issued by the FME is not included with the shipment of the product and this information is relevant for the customer to identify the product as being FSC certified, the related delivery documentation has included the same information as required in indicator 2.3 and a reference linking it to the sales documentation.</p> <p>Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V3-0 Clauses 5.1 and 5.3</p>	<p>C</p>	<p>Haul tickets used by COC certified primary producers include information about whether the logs are from a certified Classified Forest tract.</p>
<p>2.5 If the FME is unable to include the FSC claim and/or certificate code in sales or delivery documents, the required information has been provided to the customer through supplementary documentation (e.g. supplementary letters). In this case, the FME has obtained permission from SCS to implement supplementary documentation in accordance with the following criteria:</p> <ul style="list-style-type: none"> a. there shall exist clear information linking the supplementary documentation to the sales or delivery documents; b. there is no risk that the customer will misinterpret which products are or are not FSC certified in the supplementary documentation; and 	<p>NA</p>	

<p>c. where the sales documents contain multiple products with different FSC claims, each product shall be cross-referenced to the associated FSC claim provided in the supplementary documentation.</p>		
<p>2.6 The FME may identify products exclusively made of input materials from small or community producers by adding the following claim to sales documents: “From small or community forest producers.” This claim can be passed on along the supply chain by certificate holders. <i>A forest management unit (FMU) or group of FMUs that meet(s) the small and low-intensity managed forest eligibility criteria (FSC-STD-1-003a) and addenda. A community FMU must comply with the tenure and management criteria defined in FSC-STD-40-004.</i></p>	NA	
	X	N/A, not a small or community producer; or does not wish to pass along this claim.
<p>3. Labeling and Promotion</p>		<p>N/A, FME does not use/ intend to use trademarks and no trademark uses were detected during the audit.</p> <p>N/A, CW/FM certificates are not allowed to use FSC trademarks and no trademark uses were detected during the audit (Note: it is a Major nonconformity to 3.1 if CW/FM certificates are found to be using trademarks).</p>
<p>3.1 The FME shall adhere to relevant trademark use requirements of FSC-STD-50-001 described in the <i>SCS Trademark Annex for FMEs</i>.</p>	X	Refer to evidence cited in applicable trademark checklist(s) cited below.
<p>4. Outsourcing</p>	X	<p>N/A, FME does not outsource any COC-related activities, as confirmed via interviews, sales documentation, and field observation.</p> <p>N/A, FME outsources low-risk activities such as transport and harvesting, as confirmed via interviews, sales documentation, and field observation.</p>
<p>4.1 The FME shall provide the names and contact details of all outsourced service providers.</p>	NA	No outsourcing is used.
<p>4.2 The FME shall have a control system for the outsourced process and agreement which ensures that:</p> <ul style="list-style-type: none"> a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership; b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement; c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing; 	NA	Outsourcing is not used.

<p>d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use.</p> <p>e) The outsourcer does not further outsource the material.</p> <p>f) The outsourcer accepts the right of the certificate body to audit them.</p>		
<p>5. Training and/or Communication Strategies</p>		
<p>5.1 All relevant FME staff and outsourcers shall be trained in the FME’s COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME’s COC control system.</p>	<p>C</p>	<p>FME staff receive COC-related training. District Foresters demonstrated how training records are logged in an online database administered by the central office. District foresters instruct loggers and consulting foresters in obtaining the CoC number in the event of a certified sale. Group participants conducting a certified sale were visited during the audit and their CoC documentation found to be in order. Documentation of training provided in 2017 for loggers and consultants was provided.</p>
<p>5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings or communications, the intended frequency of COC training (e.g., training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc.).</p>	<p>C</p>	<p>FME staff receive COC-related training. District Foresters demonstrated how training records are logged in an online database administered by the central office.</p>

Appendix 8 – Trademark Standard Conformance Table

SCS Trademark Annex for FMEs: FSC Trademarks, FSC-STD-50-001 V2-0

PART I: General Requirements for Use of the FSC Trademarks
 (FSC “checkmark-and-tree” logo, initials “FSC,” and/or name “Forest Stewardship Council”)

<p>Description of how the FME currently uses, or intends to use, FSC trademarks and/or labels, including but not limited to printed materials, Internet applications, on-product labeling, and other public-facing media:</p>	<p>ICFCG used FSC trademarks/logos on their public website, in group manual (Umbrella Plan), and some informational brochures and maps.</p>
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<p>1.2 Trademark License Agreement and valid certificate In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate. <i>Note: Consultations for certification Organizations applying for forest management certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.</i></p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
<p>1.6 Product Group List The products intended to be labeled or promoted as FSC certified have been included in the FME’s certified product group list.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
<p>Section 1.2 and 1.6 Evidence: Included in FME’s product group list as reported in “Species in scope of joint FM/COC certificate”, Section 7 of this report.</p>	
<p>1.3 Trademark License Code The FSC trademark license code assigned by FSC to the FME accompanies any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
<p>1.4 Trademark Symbol The FSC logo and the ‘Forests For All Forever’ marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered. For use in a country where the trademark is not yet registered, use of the symbol ™ is recommended. The Trademark Registration List document is available in the FSC trademark portal and marketing toolkit. The symbol ® shall also be added to ‘FSC’ and ‘Forest Steward-ship Council’ at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure). <i>NOTE: The use of the trademark symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer statement specified in requirement 6.2.</i></p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, one or more noted exceptions apply
<p>2.1 Restrictions on using FSC trademarks The FME has not used the FSC trademarks in the following ways:</p> <ul style="list-style-type: none"> a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme; b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the FME, outside the scope of certification; c) to promote product quality aspects not covered by FSC certification; d) in product brand or company names, such as ‘FSC Golden Timber’ or website domain names; e) in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements. 	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
<p>2.2 Translations</p>	<input checked="" type="checkbox"/> C

<p>The name 'Forest Stewardship Council' has not been replaced with a translation. A translation may be included in brackets after the name, for example: Forest Stewardship Council® (translation)</p>	<input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, no translations
<p>Sections 1.3, 1.4, 2.1, and 2.2 Evidence: Website, timber sale documents, manuals and other handbooks used by FME.</p>	
<p>Sections 8 and 9 Graphic Rules The FME has only used FSC logos that conform to the standard requirements governing:</p> <ul style="list-style-type: none"> • color and font (8.1-8.3); • format and size (8.4-8.9); • label placement (8.10); and • 'Forests For All Forever' marks (9.1-9.7). 	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not using FSC logo
<p>1.5 Trademark Use Approval The FME has submitted all intended uses of the FSC trademarks to SCS for approval. OR The FME has an approved trademark use management system in place. (If the FME has a trademark use management system, complete Annex A.)</p> <p><i>4.6 FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed before the products go to the final point of sale or are delivered to uncertified organizations.</i></p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
<p>Sections 1.5 Evidence: FME requested two trademark approvals between 6/26/17 and 5/1/2018 which were approved.</p>	

PART II: On-Product Use of FSC Trademarks

N/A, not using on-product trademarks (skip Part II)

PART III: Promotional Use of FSC Trademarks

<p>6.1 Catalogues, Brochures, and Websites When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply:</p> <ul style="list-style-type: none"> • It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc. • If both FSC-certified and uncertified products are listed, then a text such as "Look for our FSC®-certified products" shall be used next to the promotional elements and the FSC-certified products shall be clearly identified. • If some or all the products are available as FSC certified on request only, this is clearly stated. 	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not using trademarks in catalogues/ brochures/websites
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<p>6.2 Sales and Delivery Documents When the FSC trademarks are included on sales or delivery document templates that may be used for both FSC and non-FSC products, the following or a similar statement is included: “Only the products that are identified as such on this document are FSC certified”.</p> <p><i>NOTE: Use of the FSC claim and certificate code on invoices does not qualify as FSC trademark use.</i></p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not using trademarks on templates for FSC & non-FSC products
<p>6.3 Promotional Items All promotional items (e.g., mugs, pens, T-shirts, caps, banners, vehicles, etc.) have displayed, at minimum, the FSC logo and FSC trademark license code.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not labeling promotional items
<p>6.5 Trade Fairs When the FSC trademarks are used for promotion at trade fairs, the FME has:</p> <ul style="list-style-type: none"> a) clearly marked which products are FSC certified, or b) add an add a visible disclaimer stating “Ask for our FSC®-certified products” or similar if no FSC-certified products are displayed. <p><i>NOTE: Use of text to describe the FSC certification of the FME does not require a disclaimer.</i></p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not using trademarks at trade fairs
<p>Section 6.6 and 6.7 Investment/Financial Claims When investment companies or others are making financial claims based on the FME’s FSC certified operations, the FME has taken full responsibility for the use of the FSC trademarks. Any such claims have been accompanied by the disclaimer, “FSC is not responsible for and does not endorse any financial claims on returns on investments.”</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not making financial claims about FSC status
<p>7.1 and 7.2 Other Forestry Certification Scheme Logos The FSC trademarks have not been used together with the marks of other forest certification schemes in a way which implies equivalence, or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not using other scheme logos
<p>7.3 Business Cards The FSC trademarks have not used on business cards to promote the FME’s certification. The FSC logo or ‘Forests For All Forever’ marks are not used on business cards for promotion. A text reference to the FME’s FSC certification, with license code, is allowed, for example “We are FSC® certified (FSC® C#####)” or “We sell FSC®-certified products (FSC® C#####)”.</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, approval granted prior to July 1, 2011
<p>7.4 Promotion with CB Logo FSC certified products have not been promoted using only the SCS Kingfisher and/or SCS Global Services logo.</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> C w/Obs

Sections 6.1 - 6.3, 6.5-6.7, 7.1-7. 4 Evidence: Websites, manuals, and other FME documents.

Number of trademark uses reviewed and rationale that sample choice is sufficient to confirm requirements are met: 2, total sample of requested and approved TM requests with documentation of SCS approval.

Annex A: Trademark use management system

N/A, not using a trademark management system

Annex B. Additional trademark rules for group FM certificate holders

<p>Annex B, 1.1 The group entity (or manager, or central office) shall ensure that all uses of the FSC trademarks by the group entity or its individual members are approved by the certification body prior to use, or that the group and its members have an approved trademark use management system in place. When seeking approval by the certification body, group members shall submit all approvals via the group entity or central office, and keep records of approvals. Alternative submission methods may be approved by the certification body.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
<p>Section 1.1 Evidence: Review of policies, handbooks, interviews with staff, inspection of sales documents.</p>	
<p>Annex B, 1.2 The group entity shall not produce any document similar to an FSC certificate for its participants. If individual membership documents are issued, these statements shall be included: a) "Managing the FSC® certification program of SCS Global Services" b) "Group certification by SCS Global Services"</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not issuing individual membership documents
<p>Annex B, 1.3 No other forest certification schemes' marks or names shall appear on any membership documents (as per clause 1.2) issued by the group in connection with FSC certification. <i>Note: This only applies to documents issued per Annex B, 1.2 and NOT other documents such as group procedures.</i></p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
<p>Annex B, 1.4 Subcodes of members shall not be added to the license code.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
<p>Sections 1.2, 1.3, and 1.4 Evidence: Evidence as described above.</p>	

Appendix 9 – Peer Review and SCS Evaluation Team Response to Peer Review

A peer review was not conducted as part of this evaluation.

Appendix 10 – SLIMF Eligibility Criteria

An FMU qualifies as a 'SLIMF' if it is either a 'small' FMU OR managed as a 'low intensity' FMU. Per INT-STD-01-003_01, the area of a small forest is defined in relation to productive forest area. Permanent protected areas and areas with other uses within the FMU that are clearly indicated in the FMP and on the ground are not considered when calculating the size of the FMU to be classified as a SLIMF. Any SLIMF FMU under the scope of the FME under evaluation must meet at least one of the following criteria:

<input type="checkbox"/> N/A – none of the FMU(s) under evaluation qualify as a SLIMF according to the criteria below.	
<input type="checkbox"/> 'Small' FMU(s)	According to the SLIMF Eligibility Criteria addendum of FSC-STD-01-004a, the country/countries in which this certificate holder is located has a small SLIMF threshold of (check only one box): <input type="checkbox"/> 100 ha (247 acres) or less <input type="checkbox"/> Between 100 ha (247 acres) and 1,000 ha (2,471 acres) <input type="checkbox"/> 1,000 ha (2,471 acres) or less
<input type="checkbox"/> 'Low intensity' FMU(s) –The scope of the certificate includes FMU(s) in which the rate of harvest is less than 20% of the mean annual increment (MAI) AND these FMUs meet one of the following additional criteria:	<input type="checkbox"/> The annual harvest from the total production forest area for any one FMU is less than 5000 cubic meters (2.1 million board feet).
	<input type="checkbox"/> The average annual harvest from the total production forest is less than 5000 m ³ / year (2.1 million board feet / year) during the period of validity of the certificate as verified by harvest reports and surveillance audits.

Appendix 11 – Group Management Program

This is not a group certificate, so this appendix is not applicable.

Group Management Conformance Table

Requirement	C/NC	Comment / CAR
PART 1 QUALITY SYSTEM REQUIREMENTS		
C1 General Requirements		
1.1 The Group entity shall be an independent legal entity or an individual acting as a legal entity.	C	The independent legal entity is the State of Indiana. The <i>Umbrella Management Plan</i> (p 1) and <i>Classified Forest & Wildlands Procedures Manual</i> (pp 2-4) describe the history of history of state laws that establish the State of Indiana's Division of Forestry as the manager of the group program with technical assistance provided by the Division of Fish & Wildlife.

<p>1.2 The Group entity shall comply with relevant legal obligations, as registration and payment of applicable fees and taxes.</p>	<p>C</p>	<p>The group entity, Indiana Division of Forestry Classified Forest & Wildlands Program ('Classified Program') is responsible for paying fees to the FSC certification body (CB) and annual accreditation fee to FSC through the CB. ICF is up-to-date on payments to the CB. As a state entity, the Classified Program does not pay state or Federal tax.</p>
<p>1.3 The Group entity shall have a written public policy of commitment to the FSC Principles and Criteria.</p>	<p>C</p>	<p>The Umbrella Plan states this commitment (p 1). The plan is publicly available on the IDNR website.</p>
<p>1.4 The Group entity shall define training needs and implement training activities and/or communication strategies relevant to the implementation of the applicable FSC standards.</p>	<p>C</p>	<p>The Umbrella Plan explains that "It is an expectation of group member, group management, and persons recommending/conducting management activities will educate themselves on certification related topics appropriate for their role in the group" (p 38). The plan also includes several training opportunities covering a range of forest management topics. Interviews with IDNR personnel demonstrated a thorough awareness of training requirements and opportunities.</p>
<p>C2 Responsibilities</p>		
<p>2.1 The Group entity shall clearly define and document the division of responsibilities between the Group entity and the Group members in relation to forest management activities (for example with respect to management planning, monitoring, harvesting, quality control, marketing, timber sale, etc.).</p> <p><i>NOTE: The actual division of responsibilities may differ greatly between different group certification schemes. Responsibilities regarding compliance to the applicable Forest Stewardship Standard may be divided between the Group entity and Group members in order to take into account of a landscape approach.</i></p>	<p>C</p>	<p>The Umbrella Plan describes the roles and responsibilities of all parties who are involved in the Classified Program: State Forester, Director of the Division of Forestry; Assistant State Forester; Forest Stewardship Coordinator / Group Manager; District Forester; District Wildlife Biologists; Landowners / Group Members; Professional Foresters; and Other Forestry Professionals (pp 4-6).</p>

<p>2.2 The Group entity shall appoint a management representative as having overall responsibility and authority for the Group entity’s compliance with all applicable requirements of this standard.</p>	<p>C</p>	<p>As explained in the Umbrella Plan, the Assistant State Forester has overall responsibility and authority, in collaboration with the State Forester, Director of the Division of Forestry (p 4).</p>
<p>2.3 Group entity staff and Group members shall demonstrate knowledge of the Group’s procedures and the applicable Forest Stewardship Standard.</p>	<p>NC</p>	<p>During audit inspections review of tract folders, it was discovered some files were missing close-out documents. Interviews with staff confirmed at least 2 District Foresters were unsure if ICFCG group management procedures require a close out, or BMP inspection, after harvests are completed or stated they did not have time to do them. Another topic identified was an inconsistent understanding and implementation by staff of actions to take when land owner/ group members fail to notify staff prior to harvesting. Finding 2019.4 – upgraded from 2018</p>
<p>C3 Group entity’s procedures</p>		
<p>3.1 The Group entity shall establish, implement and maintain written procedures for Group membership covering all applicable requirements of this standard, according to scale and complexity of the group including:</p>	<p>C</p>	<p>-</p>
<p>I. Organizational structure;</p>	<p>C</p>	<p>A simple organizational chart for the program is presented in the Umbrella Plan (p 3).</p>
<p>II. Responsibilities of the Group entity and the Group members including main activities to fulfill such responsibilities (i.e. Development of management plans, sales and marketing of FSC products, harvesting, planting, monitoring, etc);</p>	<p>C</p>	<p>See Indicator 2.1.</p>
<p>III. Rules regarding eligibility for membership to the Group;</p>	<p>C</p>	<p>Eligibility requirements are explained in the Umbrella Plan (p 4).</p>
<p>IV. Rules regarding withdrawal / suspension of members from the Group;</p>	<p>C</p>	<p>Voluntary withdrawal and enforced/mandatory withdrawals are described in the Umbrella Plan (pp 7-8).</p>

<p>V. Clear description of the process to fulfill any corrective action requests issued internally and by the certification body including timelines and implications if any of the corrective actions are not complied with;</p>	<p>C</p>	<p>The issuance of corrective actions and the decisions to create timelines to fulfill them are described in the Umbrella Plan (p 8). Non-Conformance Guidelines are presented in a table with descriptions of the response that is required for each type of non-conformance. The INFRMS database system is used to track such internal CARs.</p>
<p>VI. Documented procedures for the inclusion of new Group members;</p>	<p>C</p>	<p>The <i>Group Enrollment</i> section of the Umbrella Plan describes these procedures (p 6).</p>
<p>VII. Complaints procedure for Group members.</p>	<p>C</p>	<p>The Umbrella Plan states that Group members who are involuntarily removed from the program have 30 days to contest their removal (p 7-8).</p>
<p>3.2 The Group entity’s procedures shall be sufficient to establish an efficient internal control system ensuring that all members are fulfilling applicable requirements.</p>	<p>C</p>	<p>The Classified Program group management planning documents and procedures and the underlying State of Indiana laws that establish the program provide a framework for an efficient internal control system to help ensure that all members are fulfilling applicable requirements.</p>
<p>3.3 The Group entity shall define the personnel responsible for each procedure together with the qualifications or training measures required for its implementation.</p>	<p>C</p>	<p>The Umbrella Plan assigns responsibility for group management procedures to Classified Program staff positions located at the state and district levels, including minimum qualifications for each (pp 4-5). The plan also describes the training requirements and opportunities (pp 38-39).</p>
<p>3.4 The Group entity or the certification body shall evaluate every applicant for membership of the Group and ensure that there are no major nonconformances with applicable requirements of the Forest Stewardship Standard, and with any additional requirements for membership of the Group, prior to being granted membership of the Group. <i>NOTE: for applicants complying with SLIMF eligibility criteria for size, the initial evaluation may be done through a desk audit.</i></p>	<p>C</p>	<p>The Classified Program has a robust internal evaluation system for the group program. As described by the Umbrella Plan and verified through interviews and review of documents, there are initial inspection and re-inspection of group member forestlands. It is the District Forester’s responsibility to inspect all certified group members at 5-year intervals and may conduct site visits during environmental impact assessments or active timber sales. Eligibility to join the Classified Forest & Wildlands Program and the FSC group certificate is determined during initial field visits.</p>
<p>C4 Informed consent of Group members</p>		

<p>4.1 The Group entity shall provide each Group member with documentation, or access to documentation, specifying the relevant terms and conditions of Group membership. The documentation shall include:</p>	<p>C</p>	<p>-</p>
<p>i. Access to a copy of the applicable Forest Stewardship Standard;</p>	<p>C</p>	<p>The Classified Program provides the FSC US Forest Management Standard on its webpage.</p>
<p>ii. Explanation of the certification body's process;</p>	<p>C</p>	<p>The Umbrella Plan describes these requirements (p 2).</p>
<p>iii. Explanation of the certification body's, and FSC's rights to access the Group members' forests and documentation for the purposes of evaluation and monitoring;</p>	<p>C</p>	
<p>iv. Explanation of the certification body's, and FSC's requirements with respect to publication of information;</p>	<p>C</p>	
<p>v. Explanation of any obligations with respect to Group membership, such as:</p> <p><i>NOTE: In some groups, it may be sufficient to provide individual members with a summary of these items, provided that full documentation is readily available on request at the Group entity's offices. The information should be presented in a way adapted to the language and knowledge of the Group members.</i></p>	<p>C</p>	<p>-</p>
<p>a. maintenance of information for monitoring purposes;</p>	<p>C</p>	<p>Assignment of membership records and reporting to group entity staff, group members, and supporting private contractor (private foresters and other forestry professionals) is described in the Umbrella Plan (p 9).</p>

<p>b. use of systems for tracking and tracing of forest products;</p>	<p>C</p>	<p>This is described in the <i>Marketing of Forest Products</i> section of the Umbrella Plan (pp 20-22). Group members must contact their District Forester prior to making a certified sale to be informed of tracking and tracing requirements.</p>
<p>c. requirement to conform with conditions or corrective action requests issued by the certification body and the group entity</p>	<p>C</p>	<p>The process for addressing any internal CARs is included in the <i>Enforcement & Mandatory Withdrawal</i> section of the Umbrella Plan (pp 7-8). It includes a description of timelines and implications for any CARs that are not addressed, including that failure to conform may result in expulsion from the group. The Classified Program does not differentiate between CARs issued internally or the CB.</p>
<p>d. any special requirements for Group members related to marketing or sales of products within and outside of the certificate;</p>	<p>C</p>	<p>This is described in the <i>Marketing of Forest Products</i> section of the Umbrella Plan (pp 20-22). All sales of FSC-certified products by group members are direct to COC-certified loggers or mills. COC requirements for the sale of certified logs or firewood are also in this section.</p>
<p>e. other obligations of Group membership; and</p>	<p>C</p>	<p>FSC-certified group members must be enrolled in the State of Indiana’s Classified Forest & Wildlands Program.</p>
<p>f. explanation of any costs associated with Group membership.</p>	<p>C</p>	<p>This is described for group members who choose to be FSC-certified in the <i>Group Fees</i> section of the Umbrella Plan (p 9).</p>
<p>4.2 A consent declaration or equivalent shall be available between the Group Entity and each Group member or the member’s representative who voluntarily wishes to participate in the Group. The consent declaration shall:</p> <p><i>NOTE: A consent declaration does not have to be an individual document. It can be part of a contract or any other document (e.g. meeting minutes) that specifies the agreed relationship between the Group member and the Group entity.</i></p>	<p>C</p>	<p>-</p>

i. include a commitment to comply with all applicable certification requirements;	C	Group members opt in to the FSC group at the initial enrollment and at the 5-year re-inspection. The information provided to opt in meets these requirements below.
ii. acknowledge and agree to the obligations and responsibilities of the Group entity;	C	
iii. acknowledge and agree to the obligations and responsibilities of Group membership;	C	
iv. agree to membership of the scheme, and	C	
v. authorize the Group entity to be the primary contact for certification and to apply for certification on the member's behalf.	C	
C5 Group Records		
<p>5.1 The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include:</p> <p><i>NOTE: The amount of data that is maintained centrally by the Group entity may vary from case to case. In order to reduce costs of evaluation by the certification body, and subsequent monitoring by FSC, data should be stored centrally wherever possible.</i></p>	C	Review of a sample of documents confirms conformance with this requirement. Examples: State Form 52521 CF&WP Annual Report form; logo approval records by SCS; off-product FSC logo tracking sample; Indiana Classified Forest Certified Group Departure Request Form; FSC information form for landowner members; and State Form 55101 (9-12) Green Certification Benefit Decision – opt in/out form.
i. List of names and contact details of Group members, together with dates of entering and leaving the Group scheme, reason for leaving, and the type of forest ownership per member;	C	Tracked in INFRMS database, as verified by audit team review.
ii. Any records of training provided to staff or Group members, relevant to the implementation of this standard or the applicable Forest Stewardship Standard;	C	

<p>iii. A map or supporting documentation describing or showing the location of the member’s forest properties;</p>	<p>C</p>	<p>The location of group member properties is included on maps within the Umbrella Plan. Group members must have a legal parcel description in order to join the group, thus ensuring that coordinates and area of each FMU are known. Maps of group member properties are also stored in physical files at each District Office. Maps of properties are also available in INFRMS.</p>
<p>iv. Evidence of consent of all Group members;</p>	<p>C</p>	<p>The signature page for consent is stored in each group member’s file at district offices.</p>
<p>v. Documentation and records regarding recommended practices for forest management (i.e. silvicultural systems);</p>	<p>C</p>	<p>Typical silvicultural systems are described in the Umbrella Plan, as well as in individual group member stewardship plans. Harvest records are included in Annual Reports. Harvest history is also documented in updates to each group member’s FMP.</p>
<p>vi. Records demonstrating the implementation of any internal control or monitoring systems. Such records shall include records of internal inspections, non-compliances identified in such inspections, actions taken to correct any such non-compliance;</p>	<p>C</p>	<p>A sample of records were reviewed that demonstrate compliance with this requirement. Examples include Annual Reports, inspection and re-inspection reports, withdrawal forms, and certification departure requests. Inspection and re-inspection reports list identified non-compliances and actions taken to correct non-compliances.</p>
<p>viii. Records of the estimated annual overall FSC production and annual FSC sales of the Group.</p>	<p>C</p>	<p>Tracked through Annual Reports as entered into INFRMS.</p>
<p>5.2 Group records shall be retained for at least five (5) years.</p>	<p>C</p>	<p>Records are kept much longer than 5 years. For example, procedures stipulate that the group entity shall maintain records of Annual Reports for a minimum of 10 years. Some documents (e.g., original application) are kept for 15 years or indefinitely in hard files at each district office.</p>
<p>5.3 Group entities shall not issue any kind of certificates or declarations to their group members that could be confused with FSC certificates. Group member certificates may however be requested from the certification body.</p>	<p>C</p>	<p>The Classified Program does not issue any kind of certificates or declarations to its group members that could be confused with FSC certificates.</p>
<p>PART 2 GROUP FEATURES</p>		

C6 Group Size		
6.1 There is no restriction on the maximum size that a group certificate can cover in terms of number of group members, their individual forest property size or total forest area. The Group entity shall have sufficient human and technical resources to manage and control the Group in line with the requirements of this standard. <i>NOTE: The number of Group members, their individual size and the total area will however influence the evaluation intensity applied by the certification body in their annual audits.</i>	C	While long-term budget cuts from the state legislature have stretched the ability of IDNR to continue to grow and execute the program in an exemplary manner, the agency was able to secure multi-year funding through NRCS to support filling some vacancies. These hires will be critical to supporting the program.
6.2 The Group entity shall specify in their procedures the maximum number of members that can be supported by the management system and the human and technical capacities of the Group entity.	C	Maximum group size defined in Umbrella plan.
C7 Multinational groups	NA	Non applicable, this is a fully US based group with all group member properties located within the state of Indiana.
PART 3 INTERNAL MONITORING		
C8 Monitoring requirements		
8.1 The Group entity shall implement a documented monitoring and control system that includes at least the following:	C	-
i. Written description of the monitoring and control system;	C	Monitoring is documented in the <i>Monitoring of BMPs</i> section in the Umbrella Plan (pp 23-24). Division of Forestry also produces an annual monitoring summary of the BMP results. Monitoring procedures for site visits to group member FMUs is also described in Procedures Manual (p 35).
ii. Regular (at least annual) monitoring visits to a sample of Group members to confirm continued compliance with all the requirements of the applicable Forest Stewardship Standard, and	C	Per Umbrella Plan (p 23), 10% of timber sales are monitored for BMPs using the Indiana Forestry BMP Monitoring Form. At the group member level, District foresters are involved in timber sales and monitor

<p>with any additional requirements for membership of the Group.</p>		<p>implementation of BMPs, aiming for at least once during an active harvest. Post-harvest visits are also conducted.</p>
<p>8.2 The Group entity shall define criteria to be monitored at each internal audit and according to the group characteristics, risk factors and local circumstances.</p>	<p>C</p>	<p>The Classified Program has two main types of internal audits. One is the site re-inspection (occurring every 5 years), during which the FMP is updated with input from the group member. The FMP template contains the criteria that must be addressed.</p> <p>BMP monitoring is completed on approximately 10% of timber sales. A form that contains the criteria to be assessed is completed. These are summarized each year in a publicly available report.</p> <p>Additionally, district foresters are e involved in timber sales on group lands and monitor the implementation of BMPs. Pre- and post-harvest evaluation forms are completed.</p>
<p>8.3. The minimum sample to be visited annually for internal monitoring shall be determined as follows:</p> <p><i>NOTE: for the purpose of sampling, FMUs < 1,000 ha and managed by the same managerial body may be combined into a 'resource management unit' (RMU) according to the proposal made in FSC-STD-20-007 Annex 1.</i></p>	<p>C</p>	<p>-</p>
<p>a) Type I Groups with mixed responsibilities (see section D Terms and definitions)</p> <p>Groups or sub-groups with mixed responsibilities shall apply a minimum sampling of $X = \sqrt{y}$ for 'normal' FMUs and $X = 0.6 * \sqrt{y}$ for FMUs < 1,000 ha. Sampling shall be increased if HCVs are threatened or land tenure or use right disputes are pending within the group.</p>	<p>C</p>	<p>Although the IDNR assists landowners in preparation of management plans and may have some oversight in harvesting, the Classified Program, is considered a Type 1 Group due to the responsibilities being divided between group members and state staff. The program is eligible for Resource Management Unit designation due to its involvement in management planning and oversight of group members.</p>

<p>b) Type II Resource Manager Groups (see section D Terms and definitions) Group entities who also operate as resource managers may define the required internal sampling intensity at their own discretion for the forest properties they are managing, independent of their size and ownership (the minimum numbers as defined above do not apply here).</p>	<p>NA</p>	<p>-</p>
<p>8.4 For monitoring purposes the Group entity should use the same stratification into sets of 'like' FMUs as defined by the certification body in their evaluation.</p>	<p>C</p>	<p>All group members are under natural/ semi-natural forest management. Most group members have tracts less than 100 ha in size. The fact that the program updates 15-17% of FMPs per year provides that IDNR staff reasonably visits members in both the 0-100 ha and 100-1,000 ha range.</p>
<p>8.5 The Group entity should visit different members in their annual monitoring than the ones selected for evaluation by the certification body, unless pending corrective actions, complaints or risk factors are requiring a revisit of the same units.</p>	<p>C</p>	<p>Since the program samples more group members than is required under this standard, they visit several group members each year that the CB does not.</p>
<p>8.6 In the selection process of members to be visited, the Group entity should include random selection techniques.</p>	<p>C</p>	<p>The program uses random sampling techniques to select group members for BMP evaluation. FMP updates are not random. In general, as the program visits more group members than required by the standard, they are at low risk of failing to uncover nonconformities on group member FMUs.</p>
<p>8.7 The Group entity shall issue corrective action requests to address non-compliances identified during their visits and monitor their implementation.</p>	<p>C</p>	<p>The process for addressing any internal CARs is included in the <i>Enforcement & Mandatory Withdrawal</i> section of the Umbrella Plan (pp 6-7). It includes a description of timelines and implications for any internal CARs that are not addressed. Monitoring is documented in <i>Monitoring of BMPs</i> in the Umbrella Plan (pp 23-24). CARs may be issued to ensure compliance with BMPs.</p>

8.8 Additional monitoring visits shall be scheduled when potential problems arise or the Group entity receives information from stakeholders about alleged violations of the FSC requirements by Group members.	C	Visits for pre-harvest, during harvest, and post-harvest are also conducted to ensure conformance to certification requirements.
C9 Sales of forest products and use of the FSC trademark		
9.1 The Group entity shall document and implement a system for tracking and tracing of forest products produced by the Group members which are supposed to be sold as FSC certified.	C	Documentation and implementation required to demonstrate conformance to COC indicators for FMEs fulfills the requirements of this indicator. See FM/COC conformance table.
9.2 For the purpose of ensuring that non certified material is not being mixed with FSC certified material, FSC products shall only be sold according to a sales protocol agreed by the Group members and the Group entity.	C	
9.3 The Group entity shall ensure that all invoices for sales of FSC certified material are issued with the required information (see FSC-STD-40-004 V2-0 Clause 6.1.1) and are filed by the group members.	C	
9.4 The Group entity shall ensure that all uses of the FSC Trademark are approved by the responsible certification body in advance.	C	

Group Management Program Members

All group members’ identification and property information is tracked in INFRMS, the DoF database system. As SLIMF group members, identifying information at the property level is confidential, but a full list of all participating group members is maintained in INFRMS. Current certified lands in the program breakdown as follows: Certified Acres, 481,814; Certified Tracts, 9577; Certified Landowners 7150.

****Group member names must not be listed unless express written permission to do so is provided to SCS.***