



Wisconsin Managed Forest Law Tree Farm Group 2020 ATFS Surveillance Audit Public Summary Report

Introduction

The ATFS program of Wisconsin Managed Forest Law Tree Farm Group has demonstrated conformance with the AFF 2015-2020 Standards of Sustainability in accordance with the NSF certification process.

The WI DNR and the Wisconsin Managed Forest Law Tree Farm Group was initially certified in 2004 and recertified in 2011, 2015 - which involved an upgrade to the current standard, and 2018. The Wisconsin Department of Natural Resources manages a Group Certification program for non-industrial forestland enrolled in the Managed Forest Law (MFL). MFL Group Certification focuses on DNR's administration of the group and quality of management on member land. There are approximately 46,748 Orders/Tree Farms included in this certification that total approximately 2,584,493 acres (as of Aug. 2020). These tree farms are scattered across the state.

This program was formed to assist in the certification of Tree Farmers by integrating with the American Tree Farm System (ATFS) and using the American Forest Foundation (AFF) Standards of Sustainability for Forest Certification of Private Lands as the basis for certification.

The audit was performed by NSF on August 10-14, 2020 by an audit team headed by an audit team headed by Michelle Matteo (ATFS Lead) with Shannon Wilks (FSC Lead) as the Team Auditor(s). Audit team members fulfill the qualification criteria for conducting audits contained in the AFF requirements.

The scope of the audit included land management practices of all program members within the AFF requirements. Forest practices that were the focus of field inspections included those that have been under active management over the past year. In addition, practices conducted earlier were also reviewed as appropriate including regeneration and BMP issues, promotion of sustainable forestry practices, legal compliance, and incorporation of continual improvement systems.

All of the indicators are within the scope and none were modified.

Audit Process

NSF initiated the audit process with a planning call and extensive follow up relative to site selection to confirm the scope of the audit, review the indicators, and evidence to be used to assess conformance, verify that the Wisconsin Managed Forest Law Tree Farm Group was prepared to proceed to the audit, and to prepare a detailed audit plan. NSF then conducted the ATFS Surveillance Audit of conformance. A report was prepared and approved by an independent certification board member assigned by NSF.

The audit was governed by a detailed audit plan designed to enable the audit team to efficiently determine conformance with the applicable requirements. The plan provided for the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices.

During the audit NSF reviewed a sample of the written documentation assembled to provide objective evidence of conformance. NSF also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in the NSF protocols. NSF selected and interviewed stakeholders such as contract loggers, landowners and other interested parties, and interviewed employees within the organization to confirm that the ATFS Standard was understood and actively implemented.

The possible findings of the audit included conformance, major non-conformance, minor non-conformance, opportunities for improvement, and practices that exceeded the requirements of the standard.

Overview of Audit Findings

Five previous audit findings were checked for implementation and effectiveness and closed.

ATFS MAJ 4.1: Landowner did not meet or exceed practices prescribed by state forestry Best Management Practices (BMPs) that are applicable to the property. Repeated finding from Minor CAR 2018. **Closed:** BMPs implemented for some properties by the landowner. For the landowner that would not implement the required BMPs, they were removed from the WI-MFL Group.

ATFS MIN 4.1.1: Wisconsin's Forestry Best Management Practices for Water Quality relative to water bar installation on skid trails and haul roads are not being implemented as needed. **Closed:** Process in place for review of sites with a revised Harvest Checklist. One site that had BMP issues, the MFL system caught the problem and is following its process for closure. All other field sites had conformance.

IMG MIN 1.2.a: Adherence to the Group Member eligibility requirements in regard to the ATFS contiguity rule for eligibility is not being followed. **Closed:** When a more detailed re-measure of the TFs in question occurred, it was



confirmed that the sites in question are separated by a distance of less than 84', therefore this CAR is closed, as the contiguity rule is being followed.

IMG MIN 3.1.a: Group internal audit did not cover all WI-MFL certification requirements, as the internal audit did not cover ongoing monitoring of conformance with the Independently Managed Group (IMG) requirements, based on the documentation provided. **Closed:** 2019-2020 internal audit covers both the IMG requirements and though the field portion of the Internal audit has been delayed to later in 2020 due to COVID-19, the format has been revised and covers the additional ATFS requirements.

IMG MIN 3.1.e: Group Organization has not fully ensured implementation of the corrective action(s) (previously identified in the internal audit) and monitoring conformity as part of the regular schedule of internal monitoring. **Closed:** Process for addressing the internal and external audit findings has been updated - Update includes the internal monitoring checklist in Ch. 21 revision and a pilot implementation of Harvest Monitoring Checklist (began in December 2019). Additionally: Update and include SOPs for documenting corrective action requests and actions in Ch. 21 revision and a pilot implementation of Voluntary Compliance and Conformance Agreement (began in January 2020).

Wisconsin Managed Forest Law Tree Farm Group's ATFS Program was not found to be in conformance with the standard. NSF determined that there were two (2) minor non-conformances:

- **MINOR ATFS PM 1.1.2:** Member's management plans, including the description of current forest conditions and landowner objectives are not current/up-to-date, often after a mandatory practice has been completed.
- **MINOR IMG PM 1.2.b:** Group members compliance with all applicable requirements, with increased awareness/ knowledge of the landowner responsibilities is not being met.

Wisconsin Managed Forest Law Tree Farm Group has developed plans to address these issues. Progress in implementing these corrective action plans will be reviewed in subsequent surveillance audits.

For Additional Information Contact

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