Wisconsin Managed Forest Law Tree Farm Group
2021 ATFS™ Public Summary Audit Report

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

The Wisconsin Department of Natural Resources 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) program. MFL Group Certification focuses on DNR's administration of the group and quality of management on member lands.

There are approximately 45,687 Orders/Tree Farms included in this certification that total approximately 2,573,647 acres (as of Aug. 2021). These tree farms are located across the state of Wisconsin.

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 9-13, 2021 by an audit team lead by Shannon Wilks (ATFS Lead) with Beth Jacqmain (FSC Lead/ATFS Team) and Kyle Meister (ATFS Team). 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 harvesting operations, protection of special sites, 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 review for selection of sites, confirmation for the scope of the audit, review of the indicators, and communication of the evidence to be used to assess conformance, verification that the Wisconsin Managed Forest Law Tree Farm Group was prepared to proceed to the audit, and preparation of a detailed audit plan.

NSF conducted the ATFS Surveillance Audit of conformance within the dates outlined. 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, certified plan writers/cooperating foresters and other interested parties. Interviews were also conducted with Wisconsin Department of Natural Resource employees to confirm 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

Wisconsin Managed Forest Law Tree Farm Group was found to be in conformance with the standard. NSF determined that there were two (2) minor non-conformances:

1. ATFS Indicator 4.1.1: **Landowner shall** implement specific **state forestry BMPs** that are applicable to the property.
   - **Finding:** MFL Order # 55-030-2003-Forest operations do not meet or exceed Best Management Practices (BMPs) that address Riparian Management Zone (RMZ) requirements on this MFL order. The audit team observed evidence of equipment having entered the 15-ft. equipment exclusion zone outside of the designated stream crossing (refer to p. 91 of the WI BMP manual). There was also a corduroyed stream crossing that was not authorized in the cutting notice and not removed during harvest close-out. It appeared that the landowner may have removed half of the corduroy, but the remaining corduroy demonstrated evidence of siltation and impediment to stream flow. The designated culverted stream crossing demonstrated evidence of erosion.

2. ATFS IMG Indicator 1.2. Roles and Responsibilities
   - a. The Group Organization must adhere to ATFS eligibility requirements and may further define membership parameters for their Group, if desired.
   - **Finding:** WI MFL State Law’s eligibility requirements of contiguous acres is in conflict with the ATFS certification requirements of ATFS’ contiguity rule for eligibility. MFL Order #47-006-2001 is in ATFS Size Class 2 with 134 acres. Order has non-contiguous parcels in the Order, violating the contiguity clause for ATFS, as noted above. Tree Farm inspected is attached to MFL order with additional land that is approximately 1 mile apart and is not contiguous. Parcel is listed under same MFL order/Tree Farm designation not in compliance with ATFS eligibility requirements.

Progress in implementing these corrective action plans will be reviewed in subsequent surveillance audits.

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