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

Indiana Department of Natural Resources,

Division of Forestry, Classified Forest & Wildlands Program

Indiana, USA

SCS-FM/COC-00123N
402 West Washington Street, Room W296
Indianapolis, Indiana, 46204
Brenda Huter, BHuter@dnr.IN.gov
http://www.in.gov/dnr/forestry/4801.htm

CERTIFIED	EXPIRATION
15 March 2015	14 March 2020

DATE OF FIELD AUDIT
25-28 October 2016
DATE OF LAST UPDATE
29 November 2016

SCS Contact:
Brendan Grady | Director
Forest Management Certification
+1.510.452.8000
bgrady@scsglobalservices.com

SCSglobal SERVICES
Setting the standard for sustainability™

Foreword

2000 Powell Street, Ste. 600, Emeryville, CA 94608 USA
+1.510.452.8000 main | +1.510.452.8001 fax
www.SCSglobalServices.com

Cycle in annual surveillance audits			
☐ 1st annual audit	☒ 2nd annual audit	☐ 3rd annual audit	☐ 4th annual audit
Name of Forest Management Enterprise (FME) and abbreviation used in this report:			
Indiana Department of Natural Resources (DNR), Division of Forestry (DOF); FME; Indiana Classified Forest and Wildlands Certified Group (ICFCG).			

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing conformance with the requirements and standards of certification. A public summary of the initial evaluation is available on the FSC Certificate Database http://info.fsc.org/.

Pursuant to FSC and SCS guidelines, annual / surveillance audits are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope audit would be prohibitive and it is not mandated by FSC audit protocols. Rather, annual audits are comprised of three main components:

- A focused assessment of the status of any outstanding conditions or Corrective Action Requests (CARs; see discussion in section 4.0 for those CARs and their disposition as a result of this annual audit);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this audit; and
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the audit.

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 90 days after completion of the on-site audit. Section B contains more detailed results and information for the use by the FME.

Table of Contents

SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Annual Audit Team

Auditor Name:	Beth Jacqmain	**Auditor role**:	FSC Lead Auditor
Qualifications:	Beth Jacqmain is a Certification Forester with SCS Global Services. Jacqmain has MS Forest Biology from Auburn University and a BS Forest Management from Michigan State University. Jacqmain is Society of American Foresters (SAF) Certified Forester #1467, with 20+ years' experience in the forestry field including private corporate, private consulting, and public land management. Jacqmain is a qualified ANSI RAB accredited ISO 14001 EMS Lead Auditor and is a SCS qualified FSC Lead Auditor for Forest Management/Chain of Custody. Jacqmain has audited and led FSC certification and precertification evaluations, harvest and logging operations evaluations, and has participated in joint SFI and American Tree Farm certifications. Jacqmain is a 9 year member of the Forest Guild and 20 year adjunct-Faculty with Itasca Community College, Natural Resources Department. Jacqmain's experience is in forest management and ecology; the use of silviculture towards meeting strategic and tactical goals; forest timber quality improvement, conifer thinning operations, pine restoration, and fire ecology in conifer dominated systems.		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	4
B. Number of auditors participating in on-site evaluation:	1
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	3.5
D. Total number of person days used in evaluation:	**7.5**

1.3 Standards Employed

1.3.1. Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC US Forest Management Standard, V1-0, Family Forest Indicators (FM)	V1-0	2010
FSC Standard for Group Entities, 30-005	V1-9	2009
All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Standards page (www.scsglobalservices.com/certification-standards-and-program-documents). Standards are also available, upon request, from SCS Global Services (www.SCSglobalServices.com).		

2 Annual Audit Dates and Activities

2.1 Annual Audit Itinerary and Activities

Date: Tuesday, October 25	
FMU / Location / sites visited	**Activities / notes**
8:30 – 10:30 AM	**Opening meeting:** Introductions; audit objectives, scope, standards used; review audit plan; review field safety; audit methods, types, timings of findings; IGI's update; report timetables; presentation by DNR staff; records review, INFRMs demonstration.
10:30-5:00 PM	**District 2 Field Sites**
1 Eikenberry Timber Sale, S3/4-T27N- R03E	Sealed bid sale, 89 acres, with multiple tracts of primarily white ash with a mix of other central hardwood species including black cherry, red oak, honey locust, cottonwood and others. There were 6 black walnut veneer quality in sale. Sold August 2015 under 2 year contract. Light selection thinning marked to cut. Post-harvest with small, isolated damage at base of trees in one high traffic spot, otherwise little- to no damage of residuals. Private landowner gave notice to DNR staff during the harvest. Post-harvest inspection was completed by DNR forester and examined during audit. Sale adjacent to Eel River and special Flood Control Act conditions apply for "locked down tops". Abundant natural hardwood regeneration throughout. Abundant snags present. Discussions included: Flood Control Act; post-harvest inspections; BMP monitoring; Indiana BMPs; Timber Buyers License Law; logger liability requirements; sale bond requirements; private lands management process in Certified Group.
2 Clemens Timber Sale, S10-T28N- R03E	A salvage sale of dead and dying ash along with windthrow blowdown following a wind storm event, sealed bid, 24 acres, in a central hardwood type. Removals of marked trees included cottonwood, black oak, cherry, ash, white oak, and red maples along with other central hardwood species. Post-harvest inspection completed March 2016. Abundant natural hardwood regeneration throughout. Abundant snags observed. Discussions included: pre-harvest inspections; post-harvest inspections; RTE checks; forestry staff levels; rutting guidelines.
3 Fishburn Trust, S25-T28N- R03E	A 38 acre harvest reported using annual monitoring form. Post-inspection completed September 2016. Reported removal of storm damaged trees. Isolated pockets harvested. Discussions included: successional stages across the landscape; CFI/FIA inventory data; old growth vs. mature successional stages; forest management plan revision schedules; ICF Group Umbrella forest management plan; stewardship plan templates; DNR role in BMP monitoring; annual landowner reporting.
4 Hurst Sale, S11-T28N-R03E	Sealed bid, marked tree cut, 24 acres in central hardwoods type along with additional harvested from nearby patches. Harvest per Forest Management Plan for property. Abundant coarse woody debris and snags throughout. Discussions included: re-inspection cycle; INFRMs database system; tracking landowner violations of ICFCG program requirements.

Date: Wednesday, October 26	
FMU / Location / sites visited	**Activities / notes** **District 19 Field Sites**
1 Rich Lou Farm Timber Sale, North and South	An 11 acre and 35 acre, blow down salvage of primarily black oak, black cherry, and white oak effectively removing the largest commercial trees in the stand; 488 trees as marked by forestry consultant; sealed bid sale with 2 year contract harvesting mixed central hardwoods stand. Trees marked with "x" are considered cull and may be removed at the harvesters discretion. Strong presence of bush honeysuckle, an exotic/invasive shrub. Opening of stand from blowdown and harvest will likely increase honeysuckle. Forester informed and recommended to landowner to remove the honeysuckle so that it doesn't take over the understory.
2 Kreshock Timber Sale	A 31 acre harvest area with emerald ash borer mortality and selection thinning marked to cut, completed in 2015 with post-harvest inspection in central hardwoods. Emerald ash borer mortality "death wave" began in Indiana around 2008 and mortality detection has lagged behind leaving narrow window for volume recovery once mortality is evident. Discussions included: EAB mortality, elimination of Mill Tax in 2007-2008 and impacts on program budgets/functioning; training; RTE occurrences and related sections in property forest management plan.
3 Goldsmith HCVF site, S2-T37-03W	HCVF designation attributes of the Galena Marsh Wetland Conservation Area and the Springfield Fen Nature Preserve. Concentration attributes are 14 RT&E species are associated with this HCVF. This HCVF is adjacent to the Goldsmith property and the approved 2012 Forest Management Plan includes description of attributes; management related to attributes; and considerations for property management for protection of attributes. Protection measures primarily to avoid disturbance to wetlands.
4 Goldsmith Invasive removal	Met with licensed pesticide applicator who applied herbicide to remove oriental bittersweet vine from throughout about 30 acres on the Goldsmith property. The HCVF (Galena Marsh Wetland Conservation Area and the Springfield Fen Nature Preserve) area is approximately 1,000 feet east of the property. Applicator provided information regarding spray equipment, license, and spray record maintenance. Garlon was applied using ATV, short-range targeted spray in water with surfactant and <20 foot range. A spray was and considered superior in this applicator to mist which has more tendency to drift. Proximity to HCVF was inspected and protection of HCVF values was in conformance with the standard. Contractor was unaware of HCVF and RTE. Discussions included: Pesticide application licensing requirements in Indiana, exotic/invasives management; HCVF tracking; Nature Preserves Division.
5 Stayback Trust, S15-T37-03W	Group selection with openings (1/4 – 2 acre) to encourage oak regeneration, 20 acre sale. Set up by consultant who met at site. Pre-harvest conducted by consultant. Property FMP provided. Discussions: IDNR training for consultants for pre-harvest meetings; logging bid sales process; private land sales conditions; market and logging interactions.
Date: Thursday, October 27	

FMU / Location / sites visited	Activities / notes District 1 Field Sites
1 Sugarbush Site and Timber sale	Landowner worked directly with logging operator to harvest about 30 trees, primarily ash mortality. Failed to notify forester of harvest per ICF program requirements. Educational letter (violation notice) draft presented for auditor examination. Discussions included: ICFCG membership requirements, high grade log buyers, FMP revision requirements, and deer browsing.
2 Reinke Selection Harvest, S19-T33-R01E	Following recommendations in the 2014 version of the property FMP developed by DNR forester, the landowner arranged for a selection harvest. There were 10 acres in an oak-hickory type with trees harvested as marked by a forestry consultant. Primary goal to remove unhealthy ash trees. Met with the landowner who escorted through the site. Inspected landing at the entrance to the sale.
3, Reinke Invasive Treatment, S19-T33-R01E	Unplanned stop. Honeysuckle invasive treatment on 3 acres following the recommendations as high priority in the FMP. Following recommendation to be done prior to harvest above. Discussion: exotic invasives, contracting with private consultants, consultant training
4/5 Reinke Archaeological Sites, S19-T33-R01E	Unplanned stops. Two archaeological sites were inspected. The FMP assessment process required review and discovered 2 occurrences. Landowner was informed of type and nature (Division of Historic Preservation and Archaeology program does not release details to DNR foresters). Discussions: pre-management assessments for FMPs, NHIS checks, browsing by deer.
6 Aker Selection Site, Parcel 50-0092	Selection/thinning with small gaps, and ash mortality salvage to regenerate yellow poplar in a Beech-Maple site (central hardwoods). “Best White Oak Site in the State of Indiana.” A 32 acre sale marked by consultant who met on-site. Logged summer of 2015 but not completed until fall 2015 resulting from many stoppages due to frequent rain. Consultant administering found logging crew shut down prior to arrival several times during the course of the sale (self-shutdown).
7 Chorba WP Salvage, S24-33N-01W	A 5 acre pine scale infestation pocket in pole-sized planted white pine. Pre-commercial thinning done 12 years prior by landowner, stand approximately 20 years old. Sandy soils. Damage to trees heavily infested lead to harvest of remaining sound trees. Harvest conducted by Amish crew using conventional felling and horse skidding.
8 Chorba, Prairie grass restoration, S24-33N-01W	Early summer grass had been planted as part of a prairie restoration on sandy soils. This habitat recommendation was in the DNR produced FMP and described as a rare and declining habitat. Land owner planted blue stem, Indian grass, and other species as well as a mix obtained from Pheasants Forever. Provides habitat for nesting birds and other wildlife species. Owner had burned 2 times about 5 and 7 years prior.
9 Chorba, Oak wilt site, S24-33N-01W	Discussed oak wilt spot on his property with the DNR forester. Oak wilt is present and was identified/confirmed by forester. Discussion concerned pathology, spread, and treatment options with the landowner.
10 TNC - Ober Savanna, HCVF site	ICF member The Nature Conservancy (TNC) site is an oak savanna woodland grass site that TNC acquired and has been restoring through multiple

	prescribed burnings on sandy, droughty site. This HCVF is characterized by unique floristic and ecosystem characteristics. Discussions: HCVF assessment, HCVF external consultation, HCVF attribute maintenance, HCVF management, HCVF monitoring, HCVF public summaries.
11 – Stark Timber Sale	Active harvest site of 46 acre selection harvest using crop tree release on most desired species of walnut, red oak, white oak, yellow poplar, and cherry. Met with landowner and forestry consultant who marked the sale. Harvest shut down following heavy rain on rich/clay soils due to concerns with rutting. Several planting sites of varying ages from prior gap harvests. Planted 20, 15, and 1 year ago with walnut, red oak and yellow poplar. Discussions: New rutting guidelines, harvest notification guidelines, exotic/invasive treatments, landing BMPs.
Date: Friday, October 28	
FMU / Location / sites visited	**Activities / notes** District 13 Field Sites
8:00 AM – 12:00	
1 Purdue HCVF site, S22-T26-02W	This property managed by Purdue University who also wrote the FMP. Land purchased by Purdue in 2004, latest FMP from 2014. The HCV is a designated a Type 3, unique ecosystem with circumneutral seep. This designation based on heritage database. There were *Fragmites* invasives in the seep. There were no written evaluation of risks by invasive to HCVF attribute values. There were no written management strategies for protecting the identifying attributes. Discussions: Heritage database, INFRMs HCVF tracking, HCVF descriptions in Umbrella Plan, HCVF risks and protective measures, HCVF management strategies, FMP 5-year revision cycle.
2 Reisert honeysuckle treatment	Landowner met at site to view a 3 acre patch for an invasive honeysuckle and grape vines. Landowner recognized invasive from trainings. Is pursuing federal EQIP grant for honeysuckle removal. Landowner presented a 2011 forest inventory provided by a forestry consultant. Landowner described multiple training opportunities available to group members.
12:00 – 1:00 PM	Auditor deliberations
1:00 PM	Closing

2.2 Evaluation of Management Systems

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 document and record review, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observation of implementation of management plans and policies in the field, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their 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, stakeholder comments, and reviewed documents and records. Where consensus between 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. Changes in Management Practices

There were no significant changes in the management and/or harvesting methods that affect the FME's conformance to the FSC standards and policies.

4. Results of the Evaluation

4.1 Existing Corrective Action Requests and Observations

	Finding Number: 2015.1 (carry over of OBS 2014.4)
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☐ Next audit (surveillance or re-evaluation) ☒ Other deadline (specify): Non-binding
FSC Indicator:	FSC-US Forest Management Standard 6.5.c
Non-Conformity *(or Background/ Justification in the case of Observations)*: Indicator 6.5.c requires that "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." The DoF rutting guidelines designed to protect soil resources allow for continued hauling and skidding as long as the ruts can be smoothed so that they do not exceed 18" in depth. This guideline may not be effective at preventing root damage, changes in hydrology, and compaction that often occur when ruts are being made. Smoothing of ruts does not alleviate the root damage, compaction, and changes to hydrology associated with rutting. The Division of Forestry is working a revised rutting guideline. The guideline has been drafted and is under review. The guideline has been presented to district foresters for comment. The target for finalizing the guidelines is November 15, 2015. See rutting draft document.	
Corrective Action Request *(or Observation)*: DoF should follow-through implementing a revised rutting guideline that better protects soil and water resources.	
FME response *(including any evidence submitted)*	DNR produced a new guidance document entitled, Indiana Forestry BMP Rutting Guidelines in October 2015. DNR held a variety of internal and external training programs for forestry staff, consultants, and harvest equipment operators.
SCS review	The new rutting guidelines strengthened protections from soil compaction and implemented them over 2016. Related trainings were held in both 2015 and 2016 records for these trainings were reviewed. Additionally, DNR staff, consulting foresters, and loggers consistently demonstrated knowledge of the new rutting guidelines and their content when interviewed and quizzed in the field. Observations of all field sites inspected during 2016 were conformance related to rutting guidelines.

Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2015.2
Select one: ☒ **Major CAR** ☐ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☒ 3 months from Issuance of Final Report ☐ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FSC US Forest Management Standard Indicator 6.6.a
Non-Conformity *(or Background/ Justification in the case of Observations)*: The annual report from landowners indicated that one member in the certified group used prohibited chemicals within the last year on their individual property (diquat dibromide - CAS Registry Number 85-00-7; prohibited under FSC-GUI-30-001 V2-0 (2007) and FSC-STD-30-001a (2015) unless a derogation is granted). DNR district forester has interviewed the landowner and confirmed non-conforming use of a banned product, but DNR has not yet initiated an internal CAR per group procedures.	
Corrective Action Request *(or Observation)*: DNR shall take actions to ensure that no chemicals on the FSC Highly Hazardous Pesticide list are used by any certified group members without a valid derogation.	
FME response *(including any evidence submitted)*	The district forester has sent the landowner an educational CAR letter (Rudisill_Jeff_FSC_CAR_Letter012116.doc) per the procedure in the Indiana Classified Forest Certified Group Umbrella Plan. The 2015 Classified Forest & Wildlands newsletter contained information on pesticide use (2015 ICF Newsletter-pesticide.pdf) and the 2016 newsletter will also contain information about pesticide restrictions. On March 24, 2015 the Division of Forestry hosted a certification training for private foresters and forestry industry workers. One of the topics covered in the training was pesticide use on lands in the certified group. Training with industry continues. One-on-one trainings with 3 additional consultant foresters occurred on Dec 12, 2015 (1 forester) & January 19, 2016 (2 foresters). We plan on the same course of action for landowners for future occurrences. Here is the guidance that in included in the ICFCG Umbrella Plan for non-conformance related to banned chemical use: Banned chemical use – First (second) nonconformance: educational corrective action request letter (based on reporting time frames a landowner could do a second application before receiving CAR. Second (third) nonconformance: removal from certified group. The second part of the plan is continuing education for landowners through the newsletter or other outreach and training the industry who often does the work on private lands.

SCS review	DNR presented evidence of the previous newsletter (April 2015) and the letter sent to the group member in March 2016. DNR is not seeking derogations at this time and has informed the group member that it must cease using the prohibited chemical or voluntarily leave the certified group if it wishes to continue using it. Group procedures ensure that this matter can be dealt with in future instances.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2015.3 (upgraded Minor CAR 2014.11)
Select one: ☒ **Major CAR** ☐ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☒ 3 months from Issuance of Final Report ☐ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FSC US Forest Management Standard Indicator 9.1.a
Non-Conformity *(or Background/ Justification in the case of Observations)*: In preparation for past audits, DoF has conducted components of their HCVF evaluation which has resulted in a general list of the HCVF categories determined to be present, a combined acreage of these areas, and a list of community types that could be designated as HCVF if found in the field. However, a full HCVF assessment has not yet been completed as described in Appendix F. Although DNR has the components of a Classified Forests HCVF assessment, they have not pulled them together into a report per FSC-US guidance.	
Corrective Action Request *(or Observation)*: DoF shall identify and map 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 manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F. At a minimum, the assessment shall describe data considered, stakeholders consulted and conclusions regarding each HCV type.	
FME response *(including any evidence submitted)*	The DNR provided an HCVF Assessment for the Classified Forest group, ICF.

SCS review	The HCV classification was conducted per the six types as defined by FSC and were mapped. Auditor reviewed and used maps to select individual sites for field inspection during the 2016 audit. FME has used sources of information and conducted an evaluation, primarily relying on GIS and remote sensing data and HCVs identified on public and private nature reserves. In addition, ICFCG group manager, Indiana DNR (DNR), consulted with Division of Nature Preserves, The Nature Conservancy, and other internal and external experts in the designation process. 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 during mandatory tract inspections at least once every 5 years. Current list of assessed HCVF include adjacency and nearby attributes as determined by consultation with a number of resources but primarily databases maintained by the Division of Nature Preserves. Those attributes determined as defining the adjacent or included HCVF are included in the mapping, and those attributes are included in the property Forest Management Plan although not explicitly identified as HCVF. 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, with Family Forests, this is a low risk. However, they DNR may conduct interviews of group members to determine if there are direct domestic or irrigation water supply (i.e., a stream that a home draws from directly for its water supply). While the information presented is sufficient to close the CAR for 9.1.a, FME should consider presenting summary information on completing indicators FF 9.1.b, 9.1.c and 9.2.a, and Criteria 9.3 and 9.4 at the next audit, if necessary. SCS notes that existing documents may serve to meet portions of the just mentioned indicators and Criteria, but they do not yet exist in summary form.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2015.4 (carry over of OBS 2014.16)
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☐ Next audit (surveillance or re-evaluation) ☒ Other deadline (specify):
FSC Indicator:	FSC Standard for Group Entities, 3.1.v
Non-Conformity *(or Background/ Justification in the case of Observations)*: From 2014.16: The INFRMS database system has a method whereby District Foresters can add violations from a drop down list for particular properties when CARs are noted. However, knowledge and use of this component of CAR tracking is inconsistent among District Foresters and not all CARs are going into the database. Follow up on violations is also not consistent. Thus, while DoF has a process for issuing internal CARs, this process is inconsistently applied and followed through on. 2015 Update: Training in respect to this observation is planned but not completed. During field interviews, one district forester pointed out that internal CARs can be entered in the tract record but not in the landowner record, making it difficult for foresters in other counties to learn if a landowner has been previously issued a CAR elsewhere for a nonconformity. DNR is considering changes in the landowner database to allow CAR tracking across properties.	
Corrective Action Request *(or Observation)*: DoF should consider clarifying or providing additional training to District Foresters on the process expected to issue and fulfil any corrective action requests issued internally, including timelines and implications if any of the corrective actions are not complied with.	
FME response *(including any evidence submitted)*	DNR provided additional training and improved INFRMS database for tracking corrective action requests. DNR has examples of procedures being followed and enforcement actions in cases of non-compliance. The current system now allows District Foresters to track nonconformities across multiple tracts for a single landowner within their districts.
SCS review	Auditor confirmed additional training by review of training documents, extensive interviews with forestry staff in the field, review of property folders, and demonstrated use of the procedures for corrective actions, including examples of members who either voluntarily withdrew from the program or were “withdrawn for cause”. The evidence and performance of DNR staff warrant the closure of this Observation.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

4.2 New Corrective Action Requests and Observations

	Finding Number: 2016.1
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☐ Next audit (surveillance or re-evaluation) ☒ Other deadline (specify): *none, non-binding*
FSC Indicator:	FSC-US Forest Management Standard 6.3.h
Issue: Although several examples of aggressive control efforts were observed during the audit, some sites inspected had abundant presence of invasives. Invasive non-native plant species, such as honeysuckle, autumn olive and buckthorn, to name a few, are commonly present and generally expanding in their presence throughout Indiana forest systems. While the task of limiting the spread of these and other species identified in the Classified Forests and Wildlife certified group is challenging, there remain opportunities for DoF field personnel and managers to continue placing emphasis on and effort at monitoring and limiting the ongoing spread of invasive non-native plant species across the certified group properties.	
Observation: DNR should continue to ensure implementation of management practices that minimize the risk of invasive establishment, growth, and spread; eradication or control of established invasive populations when feasible.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2016.2
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (within 12 months of report finalization) ☐ Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard 6.6.a

Non-Conformity *(or Background/ Justification in the case of Observations)*: A banned chemical, flumioxazin, was used by a group member to control invasives during the last year. The certificate holder, DNR, is confirming details of use on certified land because there were several cases of group member (private landowner) reported use that had actually occurred on the residential portions of their property that *are not under the scope of the certificate*. If non-conformance is confirmed, the DNR provides information and education to the landowner and informs of the need to discontinue use either by interview or by issue a non-conformance notice (letter), per current procedures that will "withdraw for cause" those members who repeat non-conformances. Examples of routine and standard issuance of these non-conformances and examples were provided of members either voluntarily withdrawing or released ("withdraw for cause") from the program. It was confirmed during the audit that these procedures are being followed, including newly established procedures for issuing non-conformance educational letters. The DNR should confirm that new procedures for ensuring compliance are completed and confirm that the certificate remains in conformance with this Indicator.	
Corrective Action Request *(or Observation)*: The DNR should continue practices and procedures that ensure no products on the FSC list of Highly Hazardous Pesticides are used.	
FME response *(including any evidence submitted)*	DNR followed up with the landowner/member after receiving report of highly hazardous chemical. The landowner was informed of chemical use requirements and agreed to discontinue use. The landowner will now use mechanical means to treat their lands.
SCS review	The DNR used existing procedures and systems for this issue to ensure conformance of the group member to FSC requirements that no products on the FSC list of Highly Hazardous Pesticides are used. Observation is closed, 11/17/2016.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2016.3
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (within 12 months of report finalization) ☐ Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard 9.1.c

Non-Conformity *(or Background/ Justification in the case of Observations)*: One site inspected had an herbicide spray used for invasives with a HCVF site nearby, and although not impacting the attributes defining the HCVF, management strategies and protective measures specific to the defining attributes were unknown by the forestry consultant conducting the management activities. At a second site, an invasive species was present within the HVF that likely poses a risk to designated HCV attributes and there were no management strategies clearly identified relative to those defined HCVF attributes. Protection measures as presented by DNR are usually written in broad terms, making it difficult for field foresters to identify specific management strategies that would be taken due to the HCVF presence, as opposed to standard protection measures (as an example, rare species protection). Existing HCVF management planning documents are currently undergoing proposals and revision, which provides an opportunity to address these concerns. The management plan and relevant operational plans must 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. The DNR's identification of management strategies and protection measures related to high conservation values must be described and summarized.
Corrective Action Request *(or Observation)*: A summary of the assessment results and management strategies must be included in the management plan summary that is made available to the public.

FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2016.4
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FSC Standard for Group Entities, 3.1.v
Non-Conformity *(or Background/ Justification in the case of Observations)*: 2015: Training in respect to this is planned but not completed. During field interviews, one district forester pointed out that internal CARs can be entered in the tract record but not in the landowner record, making it difficult for foresters in other counties to learn if a landowner has been previously issued a CAR elsewhere for a nonconformity. DNR is considering changes in the landowner database to allow CAR tracking across properties.	

2016 update: DNR provided relevant training and all foresters interviewed during the course of the audit confirmed knowledge of the process. Inspections of forester maintained records confirmed that District Foresters are applying and following through on these procedures recording information for tracts inspected within their Districts. However, internal analysis of the tracking system identified a need to record nonconformities (CARs) across Districts but this change has not been completed.	
Corrective Action Request *(or Observation)*: DNR should complete system database changes to track internal CARs across Districts and begin implementation.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above), see new OBS 2016.*

	Finding Number: 2016.5
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☐ Next audit (within 12 months of report finalization) ☒ Other deadline (specify): *None, non-binding*
FSC Indicator:	FSC Standard for Group Entities, 5.1.ii
Non-Conformity *(or Background/ Justification in the case of Observations)*: The DNR demonstrates clear and notable commitment to providing training for staff and group certificate members. A new training tab was created to record training in the central database, INFRMS, under training for landowners and staff. However, not all staff records were up to date. Of those checked during the 2016 audit, 2/3rd had training records not updated since 2013. Interviewed foresters have maintained individual records training, or were able to describe training opportunities, but they were not up to date in the official database. The DNR should update training records per administrative procedures developed for updating training records in the central database, INFRMS.	
Corrective Action Request *(or Observation)*: This group management must maintain complete and up-to-date records of training provided to staff or Group members.	
FME response *(including any evidence submitted)*	
SCS review	

Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2015.6
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☐ Next audit (within 12 months of report finalization) ☒ Other deadline (specify): *None, non-binding*
FSC Indicator:	FSC Standard for Group Entities, 5.1.vi
Non-Conformity *(or Background/ Justification in the case of Observations)*: The DNR instituted new procedures to record issuing educational notices of non-conformances in response to a Major CAR issued in 2015. During the 2016 audit, there were multiple examples of correct implementation and all interviews with staff consistently confirmed knowledge and awareness of new procedures. However, during the audit there was a member non-conformance discovered during an inspection that resulted in a notice being sent, but its issuance was not entered into the official database records. The DNR should consistently record non-conformance notice letters in INFRMS as "actions taken to correct non-compliances" in accordance with newly established procedures.	
Corrective Action Request *(or Observation)*: Records should continue to demonstrate the implementation of any internal control or monitoring systems including records of internal inspections, non-compliances identified in such inspections, actions taken to correct any such non-compliance.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

5. Stakeholder Comments

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).

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 (e.g., chair of the regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders in this evaluation:

5.1 Stakeholder Groups Consulted

Academic	ENGO
Tribal representatives	Forest Industry
Forest Products Association	Logging contractors
DoF employees	

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. The table below summarizes the major comments received from stakeholders and the assessment 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.

5.2 Summary of Stakeholder Comments and Responses from the Team, Where Applicable

☐ *FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual audit.*

Stakeholder comments	**SCS Response**
Economic concerns	
"The help from DNR District Foresters helps give me confidence as a landowner that I'm getting a fair price for my products."	Confirmed during the audit that when professional foresters are consulted, such as the DNR District Foresters, encourage the use of professional foresters and a bidding process.
Social concerns	
"We don't like government interference or them telling us what to do. We worried this program would not allow us to do what we want on our own property. But our forester [DNR	FSC certification is a voluntary, market driven system that is based on third-party independent verification of conformance to FSC Principles and Standards for forest management and managing group entities. The professionalism of DNR staff was duly noted, and both the persuasive and enforcement aspects on ensuring conformance were confirmed during the audit. Per the policies of

District Forester] has been very good at explaining what is needed and why."	Classified Forests and Wildlands, group members can withdraw from FSC certification since it is voluntary.
Environmental concerns	
"The help from our DNR District Forester was invaluable. We've set up our lands as trusts for the future of our grandchildren. We take it very seriously. We read all the publications that the Classified program sends us. That's why we suspected we had oak wilt. It's a great value that when we asked the Forester to help, he came quickly and confirmed it. It's why we were able set up a harvest to clean it out so quickly."	Consultations by District Foresters to assist with insect and disease problems on group member landowner properties was observed consistently and routinely as part of the Classified Forests and Wildlands program. Training for forestry staff was confirmed and ensures they are up-to-date on current forest pest outbreaks and forest protection needs locally, regionally, and state-wide. This comment is noted as positive evidence of conformance to forest protection portions of the FSC standard.

6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the FME's response to any open CARs.	**Yes** ☒ **No** ☐

Comments and Commendations:
The results of the 2016 annual surveillance audit warrant the continuance of the Indiana Certified Group certification as maintained and implemented by the staff and District Foresters of Indiana DNR, and group members of the Indiana Certified Forest Group Certificate. There are several areas where DNR were exemplary in meeting the requirements of the FSC Standard.

1. **The training of forestry staff is notably robust. Annual external and internal training is provided at Division and Section levels, cross-District, and academic professional trainings are all supported and encouraged at the highest levels of the organization.**
2. **The INFRMS database system and supporting field technology was noted for providing forestry field staff real-time and official records improving efficiencies and enabling more accurate and timely work in the field.**
3. **District and consulting foresters demonstrated high levels of knowledge about invasive species and associated management.**
4. **Finally, Indiana DNR has produced educational videos for public education highlighting forest ecology, wildlife and habitat, community use, forest products, recreation use, and other forestry related themes, https://www.youtube.com/user/idnrvideos.**

7. Changes in Certification Scope

Any changes in the scope of the certification since the previous audit are highlighted in yellow in the tables below.

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
		Fax	317-233-3863
		e-mail	bhuter@dnr.in.gov
		Website	www.in.gov/dnr/forestry

FSC Sales Information

☒ *FSC Sales contact information same as above.*			
FSC salesperson			
Address		**Telephone**	
		Fax	
		e-mail	
		Website	

Scope of Certificate

Certificate Type	☐ Single FMU	☐ Multiple FMU		
	☒ Group			
SLIMF (*if applicable*)	☐ Small SLIMF certificate	☐ Low intensity SLIMF certificate		
	☒ Group SLIMF certificate			
# Group Members (*if applicable*)	7,671 landowners			
Number of FMUs in scope of certificate	10,190 parcels			
Geographic location of non-SLIMF FMU(s)	*Latitude:* 39°46'02.12" N (Indianapolis) *Longitude:* 86°09'55.47" W (Indianapolis)			
Forest zone	☐ Boreal	☒ Temperate		
	☐ Subtropical	☐ Tropical		
Total forest area in scope of certificate which is:	**Units:** ☐ **ha or** ☐ **ac**			
privately managed	207,623ha (513,048 ac)			
state managed				
community managed				
Number of FMUs in scope that are:				
less than 100 ha in area	10,226 parcels	100 - 1000 ha in area	162 parcels	
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:** ☒ **ha or** ☐ **ac**			
are less than 100 ha in area	182,385 ha (450,683 ac)			
are between 100 ha and 1000 ha in area	25,238 ha (62,365 ac)			

meet the eligibility criteria as *low intensity* SLIMF FMUs	Group member parcels meet the definition of SLIMF FMUs, either due to size or intensity of harvests.
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.	

Production Forests

Timber Forest Products	**Units: ☒ ha or ☐ ac**
Total area of production forest (i.e. forest from which timber may be harvested)	207,623ha (513,048 ac)
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	0
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	207,623ha (513,048 ac)
Silvicultural system(s)	**Area under type of management**
Even-aged management	10%
Clearcut (clearcut size range)	
Shelterwood	
Other:	
Uneven-aged management	90% selection
Individual tree selection	
Group selection	
Other:	
☐ Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	Average annual cut of approximately 30 million board feet (Doyle)
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	
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	
Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	
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.	

Species in scope of joint FM/COC certificate: (*Scientific / Latin Name* and Common / Trade Name)	
Acer rubrum	Red (Soft) maple
Acer saccharinum	Silver (Soft) maple
Acer saccharum	Sugar (Hard) maple
Aesculus glabra	Ohio Buckeye
Carya alba	Mockernut hickory
Carya cordiformis	Bitternut hickory
Carya illinoinensis	Pecan
Carya ovata	Shagbark hickory
Castanea dentata	American chestnut
Celtis occidentalis	Hackberry
Diospyros virginiana	Persimmon
Fagus grandifolia	American beech
Fraxinus americana	White ash
Fraxinus nigra	Black ash
Fraxinus pennyslvanica	Green ash
Fraxinus quadrangulata	Blue ash
Gleditsia triacanthos	Honey locust
Gymnocladus dioicus	Kentucky coffeetree
Juglans cinerea	Butternut
Juglans nigra	Black walnut
Liquidambar styraciflua	Sweetgum
Liriodendron tulipifera	Yellow-poplar
Maclura pomifera	Osage-Orange
Nyssa sylvatica	Blackgum
Pinus strobus	Eastern White pine
Platanus occidentalis	American sycamore
Populus deltoides	Eastern cottonwood
Prunus serotina	Black cherry
Quercus alba and others	White oak
Quercus rubra and others	Red oak
Robinia pseudoacacia	Black locust
Salix nigra	Black willow
Sassafras albidum	Sassafras
Tilia americana	American basswood
Tilia Americana	American Basswood
Ulmus americana	American elm
Ulmus rubra	Red/Slippery elm

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	All
Non-Timber Forest Products		
Product Level 1	**Product Level 2**	**Product Level 3 and Species**
NONE		

Conservation Areas

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives:	0 ha recorded; some lands, however, may informally be managed primarily for conservation values, but the majority of Classified Forests are available for harvest; within the overall program, Classified Wildlands are specifically managed for conservation values, but the FSC group certification applies specifically to Classified Forests.

High Conservation Value Forest / Areas

High Conservation Values present and respective areas: **Units:** ☐ **ha or** ☒ **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).		
☒	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 acres
☒	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	S1, S2 communities across state	10,110 acres
☐	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'				53,707 acres

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

☐ *N/A – All forestland owned or managed by the applicant is included in the scope.*	
☒ *Applicant owns and/or manages other FMUs not under evaluation.*	
☐ *Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.*	
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 certificate 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 never 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 (☐ ha or ☒ ac)**
Uncertified Classified Acres (nonforested acres, landowner declined certification or undecided)	Statewide	272,189

8. Annual Data Update

8.1 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
12 of male workers	11 of female workers	
Number of accidents in forest work since last audit:	**Serious:** 0	**Fatal:** 0

8.2 Annual Summary of Pesticide and Other Chemical Use

☐ *FME does not use pesticides.*

Commercial name of pesticide / herbicide	Active ingredient	Quantity applied annually (kg or lbs)	Size of area treated during previous year	Reason for use
Triplet	2,4-D, dicamba, R-2-(2-methyl 4-chlorophenoxy) proponic acid		101 acres	Invasive species control, grape vine control
2,4-D	2,4-D		1,305 acres	Tree planting, timber stand improvement, invasive species control, grape vine control
Section Three	Clethodim			
Crossbow, Everett	2,4-D; triclopyr		2,203 acres	Timber stand improvement, invasive species control, grape vine control
Sureguard	flumioxazin		96	Invasive species control
Pathway	2,4-D , picloram		658 acres	Timber stand improvement, invasive species control, grape vine control
Milestone	aminopyralid		164 acres	Invasive species control
Banvel	dicamba		216 acres	Invasive species control, timber stand improvement, grape vine control
Fusilade	fluazifop-P-butyl		70 acres	Invasive species control
Accord, Cornerstone, Kilz All, Rodeo, Roundup, Shoreclear	glyphosate		7,109 acres	Timber stand improvement, invasive species control ,warm season grass planting, tree planting, grape vine control
Escort	Methsulfuron methyl			Invasive species control
Habitat, Polaris	imazapyr		48 acres	Invasive species control
Simazine	simazine		29 acres	Tree planting

Tordon	Picloram		5,179 acres	Timber stand improvement, invasive species control, grape vine control
Poast	sethoxydim		628 acres	Invasive species control
Vinegar	acedic acid		44 acres	Invasive species control, grape vine control
Oust	sulfometuron methyl		225 acres	Grape vine control, invasive species control, tree planting, warm season grass establishment
Garlon, Element, Pathfinder	triclopyr		1,375 acres	Timber stand improvement, invasive species control, grape vine control

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – 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 is presented in the audit itinerary. Landowners' names are omitted for confidentiality purposes. SCS samples the Indiana Classified group as a set of SLIMF RMUs, with each district representing one RMU with numerous SLIMF group members. Prior to the audit, a spreadsheet of all the member properties with recent management activity listed by district was provided to the auditor for initial sample selection. In addition to harvests, tracts were selected in each district to assess other activities such as invasive weed control, TSI, planting, and the presence of natural areas or other special features. In consultation with the district foresters, the lead auditor considered time and travel constraints, ease of access and stakeholder issues on a property by property basis. All properties are natural forest and all are SLIMF.

For the 2016 audit, all sites with any management activity recorded for the prior year were provided. SCS selected sites to sample 4 Districts focusing on a wide range of management activities and properties with, or near, designated HCVF were selected in consideration of P9.

Appendix 2 – List of Stakeholders Consulted

List of FME Staff Consulted

Contact Information: All DNR staff contact information may be found via online directories. District Foresters may be found via this link, http://www.in.gov/dnr/forestry/4750.htm, and other staff may be contacted via this link, http://www.in.gov/dnr/forestry/2857.htm.

Name	Title	Contact Information	Consultation method
Dobbs, Carmen	District Forester	See contact information above	Field interview, Closing meeting
Eizinger, Tim	District Forester		Field interview
Huter, Brenda	Stewardship Coordinator		Field interview, Opening/closing meeting
Potthoff, James	District Forester		Field interview
Seifert, John "Jack"	State Forester		Field interview, Opening meeting
Smith, Zack	Forest Programs Coordinator		Opening meeting
Winicker, Steve	District Forester		Field interview

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Dennis Reisert	Landowner in ICFCG	219-984-5875	Field interview	N
Mr. and Mrs. Chorba	Landowner in ICFCG		Field interview	N
Mike Stark	Landowner in ICFCG		Field interview	N
Andrew Suseland	Wakeland Forestry Consultants	(574) 772-6522	Field interview	N
Bruce Wakeland	Wakeland Forestry Consultants	(574) 772-6522	Field interview	N
Mike Denman	Wakeland Forestry Consultants	(574) 772-6522	Field interview	N
Stuart Orr	The Nature Conservancy	sorr@tnc.org	Email	N

Appendix 3 – Additional Audit Techniques Employed

There were no additional audit techniques employed for this audit.

Appendix 4 – Pesticide Derogations

[X] There are no active pesticide derogations for this FME.

Appendix 5 – Detailed Observations

Evaluation Year	FSC P&C Reviewed
2014	All – (Re)certification Evaluation
2015	1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 6.1, 6.3, 6.5, 7.1, 7.3, 8.2, 8.3, 8.5, 9.1. Group Entity Criteria: C1 General Requirements, C2 Responsibilities, C3 Group entity's procedures, C9 Sales of forest products and use of the FSC trademark
2016	6.2, 6.3, 6.4, 6.5.c, 6.6.a, 7.2, 7.4, and P9 (HCVF); Open OBS/CARs: 6.5.c, 6.6.a, 9.1.a Group Manager: 3.1.V and 5 (Group Records)
2017	
2018	

C= Conformance with Criterion or Indicator
NC= Nonconformance with Criterion or Indicator
NA = Not Applicable
NE = Not Evaluated

FSC Forest Management Standard (v1.0)—United States

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.**		
Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
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.		
Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
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.		
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.		
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.	NE	
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 the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	C	
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	C	DNR procedures specify that Natural Heritage database checks be completed when preparing management plans and prior to a harvest. In all instances 2016 sites visited in the field had FMPs specific to the property and were checked against the Natural Heritage database whether the plan had been developed by a consultant or DNR District

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. If a species is determined to be present, its location should be reported to the manager of the appropriate database. 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.		Forester. When the Natural Heritage database query indicated possible presence of forest dwelling RTE species, management planning assumed such presence. Auditor observed conformance with these requirements. Through interviews and file reviews, auditor verified District Foresters are using appropriate resources to determine habitat needs of RTE species when there are Natural Heritage occurrences. Many of the Natural Heritage hits are wetland plants that were outside of timber harvest areas.
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.	C	When any landowner management plan is prepared, a check is done against the natural heritage database. When occurrences occur within forested areas, foresters consult DNR resources or consult with DNR staff of appropriate expertise. District Foresters consult with DNR Wildlife when additional information is needed regarding management modification. RTE databases are maintained by the Division of Nature Preserves (DNP). This is the natural heritage database against which requests are made for developing FMPs and revisions every 5 years. The Heritage database contains more than 1,000 records of federally endangered species; more than 12,000 records of state-listed species, and more than 1,300 records of high-quality natural communities. It also has records for more than 700 significant natural areas in the state. The DNP uses a continuous inventory process combining qualified expert

		observations (staff) as well as designed surveys and additional date from Nature Serve.
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 landscape level biodiversity conservation goals.	NA	
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).	C	As all lands within the program are privately owned, hunting, fishing, and other recreation or hunting, is strictly controlled by the owners.
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.		
6.3.a. Landscape-scale indicators [6.3.a.1-6.3.a.3]		
6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented ***successional*** 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.	C	Early and late successional forest stages are under-represented in the State of Indiana. Via tax incentives, 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 or use selection harvesting. 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. Several examples were shown during the 2016 audit of foresters creating regeneration gaps for yellow poplar and other early successional species to at least maintain this diversity within forest stands. Despite this challenge, ICFCG does encourage landowners to take steps to regenerate oak and other early successional types.
6.3.a.2 When a ***rare ecological community*** is present, modifications are made in both the management plan and its implementation in order to maintain,	C	Rare ecological communities are identified through the Natural Heritage database maintained by the DNP, as described above in 6.2.b. When rare communities are identified for a property, District

restore or enhance the viability of the community. Based on the vulnerability of the existing community, ***conservation zones*** and/or ***protected areas*** are established where warranted.		Foresters will advise landowner to protect that community. Other rare community types, which are not rare enough to be tracked in Natural Heritage database, are identified by District Foresters during property inspections. Given that the majority of silviculture on ICF group members is single tree selection, it is unlikely that rare community types would be damaged by logging.
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. 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). 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). 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).	C	ICFCG tracts will be continuously assessed for the presence of HCVF, including old growth by District Foresters during regular tract re-inspections 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. If further evaluation is warranted, the Group Manager will set up an assessment committee. A day long training for district foresters on the process of identifying old growth was held on September 17-18, 2013 focusing in particular on old growth forests. It included a field evaluation of a potential old forest site. Additionally, as discussed during the 2016 audit, trainings within and among IDNR Divisions continue to refresh knowledge about OG and other topics. Interviews with IDNR forestry staff confirmed knowledge of relevant OG topics. Interviews with landowners confirmed their awareness of OG and other protections as part of being in the certified group.

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: Old growth forests comprise a significant portion of the tribal ownership. A history of forest stewardship by the tribe exists. High Conservation Value Forest attributes are maintained. Old-growth structures are maintained. Conservation zones representative of old growth stands are established. Landscape level considerations are addressed. Rare species are protected.		
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.	NA	FME only consists of SLIMF FMUs.
6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of ***Riparian Management Zones (RMZs)*** to provide: 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.	C	RMZ are protected through implementation of Indiana BMPs. Auditor confirmed conformance with RMZ protections in site inspections during the 2016 audit. Interviews with foresters, consultants and staff, confirmed knowledge of state BMP requirements. The prevalence of selection harvest systems makes this relatively low risk for reduction of canopy below acceptable levels. Additionally, foresters, consultants, and interviews with loggers outside the 2016 ICFCG audit confirmed knowledge of the Indiana Flood Control Act, Indiana Flood Control Act (IC 14-21-1). This Act primarily pertains to streams and rivers with a drainage area larger than one square mile and is administered by the IDNR, Division of Water. Examples of forestry activities that may trigger this law are stream crossings, and leaving logging debris in regulated streams or their floodway. Interviews were notably consistent among all parties regarding the requirements and enforcement of this Act.

Stand-scale Indicators **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.	C	Silviculture practices on ICF group members is generally consistent with maintaining plant species composition. ICF members manage for a diversity of species. Indiana has strong timber markets that utilize a diversity of species. For example, a timber sale in District 19 in 2016 included the sale of 20 different tree species. Plantings tend to be skewed toward more marketable species such as oak and walnut, although examples of yellow poplar planting were noted. However, the percent composition of oak in Indiana is decreasing, thus favoring oak in plantings is justified both ecologically and economically.
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.	C	Nearly all planting stock comes from the State of Indiana nurseries that use local seed of known provenance to grow trees.
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: 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. Trees selected for ***retention*** are generally representative of the dominant species found on the site.	C	The predominance of selection harvesting, in general serves to maintain existing habitat components and stand structures similar to naturally occurring processes. Abundant snags, legacy trees, vertical and horizontal complexity were observed at all sites inspected during the 2016 audit. Retained trees from selection, thinnings, and intermixed patch cuts produce tree species generally representative of dominant species found on sites and this was observed throughout. One designated HCVF site inspected during the audit, the Ober Savanna, provided an example of a unique native system that is being restored in collaboration with The Nature Conservancy. IDNR staff notably works with DNP and external conservation groups to appropriately identify, protect, and restore native habitats.
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	C	Green Tree Retention Policy (p. 16 of IFC Umbrella Plan). Regeneration harvests greater than 20 acres are very uncommon on ICF properties. No regeneration harvests of this size were observed during the 2016 audit.

harvest unit as described in Appendix C for the applicable region. 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.		
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: 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.	NA	ICF has not had the need to request or justify a departure to green tree retention requirements.
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:	C	Interviews with ICF 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.

1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.		Numerous properties were inspected during the 2016 audit where invasive species control projects were occurring. Funding for invasive species control is available and widely used via Environmental Quality Incentive Program (EQIP). Despite the best efforts of IDNR staff, there were still examples observed on sites during the 2016 audit where known invasives were present and landowner group members had not pursued treatment. Although several examples of aggressive control efforts were observed during the audit, some sites inspected had abundant presence of invasives. Invasive non-native plant species, such as honeysuckle, autumn olive and buckthorn, to name a few, are commonly present and generally expanding in their presence throughout Indiana forest systems. See **OBS 2016.1.**
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.	C	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 ICF properties. The Division usually fulfills this responsibility through Cooperative Agreements with local fire departments to provide initial attack on wildland fires.
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.	C	
6.4.a 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 assessment for medium and large forests include some or all of the following: a) ***GAP analyses***; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with	C	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 land, etc) by natural region. Communities by Natural Regions list was compared to Managed Areas by Community Type and Natural Region list. 27 gaps (communities not represented by on managed lands in a given natural region) were identified. The Classified Forest and Wildlands parcel locations were then the compared with the locations of

universities and/or local conservation groups. For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state. **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 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.		communities identified in the Natural Heritage Database using ArcGIS. There were 327 communities located or partially located on Classified Forest & Wildlands parcels. Of the 327 communities, only 6 were gap communities. The 6 gap communities involved 8 Classified Parcels. Maps were then made of the gap communities and associated Classified Parcels.
6.4.b Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes. Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU. **FF Indicator 6.4.b** Low risk of negative social or environmental impact. However, on all FMUs where outstanding examples of common community types exist (see Guidance for 6.4.a.), they should be protected or managed to maintain their conservation value.	C	The Division of Nature Preserves were consulted for RSA mapping that was completed in 2009. The two "Forest – flatwoods dry" communities in the Southern Bottomlands Natural Region were removed from the gap list. Mike and Roger concurred that was an error in the data and that "Forest – flatwoods dry" communities by definition would not occur in the Southern Bottomland Natural Region but are found in the Southwestern Lowlands Natural Regions. The two natural regions are intertwined. The remaining 4 communities identified as valid gaps. The 4 gap communities are associated with 4 Classified Forest & Wildlands parcels.
6.4.c Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances: a) harvesting activities only where they are necessary to restore or create	C	The IDNR has evaluated each of the 4 potential RSAs. One was a Forest –Flood Plain –wet in Northern Indiana. When the district forester and a natural preserves ecologist went to the site, it was determined that the community was no longer present. At some point in the past, the area had been mined for peat. The other 3 potential RSA

conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or 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.		were in far southern Indiana: a lake-pond, wetland-circumneutral seep, and forest – swamp. The other three were evaluated and confirmed by a nature preserves ecologist. None of them occur on a certified tract, but should still be managed with consideration for the community.
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.	C	At this time, there is no indication that any new gap communities are present on certified tracts.
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.	NA	All forestland in the program is private.
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.	C	
6.5.a The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	NE	
6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	NE	
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:	C	DNR initiated a process to strengthen soil compaction and rutting guidelines, which were finalized and implemented in 2015. Related trainings were held in 2015 and 2016. Numerous interviews with DNR staff, consulting foresters, and loggers (consulted outside the ICFCG audit) consistently demonstrated knowledge of new rutting guidelines and content. Observations of all field sites inspected during 2016 were conformance related to rutting. See closing of **OBS 2015.1**.

• 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. • 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. • Low impact equipment and technologies is used where appropriate.		
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: • 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;	NE	

• 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; • unneeded roads are closed and rehabilitated.		
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 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. 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.	NE	
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	NE	

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.		
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.	NE	
6.5.g Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.	NE	
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.	NE	
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	NE	

equipment and training shall be provided to minimize health and environmental risks.		
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).	C	During the 2015 audit, an annual report from landowners indicated that one member in the certified group used prohibited chemicals within the last year on their individual property (diquat - CAS Registry Number 85-00-7). DNR district forester has interviewed the landowner and confirmed non-conforming use of a banned product, but DNR has not yet initiated an internal CAR per group procedures. 2016: Major CAR 2015.2 was closed with the use of an education letter for non-conformances. The letter functions as a warning for an individual landowner violation (internal CAR). Repetition of a violation leads to "withdrawal with cause" from the program. An incidence of new use was reported just prior to the 2016 audit. See **OBS 2016.2,** which was closed following the audit, for more detail of conformance with this 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. 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	NE	

chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.		
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. 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.	NE	
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.	NE	
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	NE	

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.		
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.	NE	
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.	NE	
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.	NE	
6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	NE	
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.	NE	
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.		
7.1. The management plan and supporting documents shall provide:	NE	

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. **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.** **c) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership. i) Description and justification of harvesting techniques and equipment to be used.**		
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.	C	
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.	C	The Umbrella Plan is updated every 10 years, and property forest management plans are updated every 5 years. Information on tree retention, invasive species, and endangered or threatened species (such as bats) are included. DoF has implemented new digital mapping and planning tools. ICF's management planning documents are up-to-date with the requirements of the FSC US standard. Training for staff is emphasized to maintain their knowledge base to incorporate into management plans or discussions with landowners. Invasive species control, herbicide applicators license, are two examples of consistent knowledge

		demonstrated during interviews and in application during the 2016 audit. Annual meetings are held with a strong training component involving both external and internal experts. These Division meetings brings in external speakers on topics determined by administrative staff and takes in requests for forestry staff. Section meetings, instituted new program training by District Foresters who are considered internal experts. For example, a TSI expert and an urban forester for tree management (hazard trees) were brought in as speakers. Two district foresters with expertise in herbaceous identification provided trained for other staff foresters. Additionally, DNR started a "traveling forester" program where District Foresters go visit other Districts for cross-training. The training program offered to foresters by the DNR is robust and noteworthy.
7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	NE	
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 Umbrella Forest Management Plan is available on the Indiana Department of Forestry website. The Stewardship plan template is available upon request from DNR staff. Other management planning documents are available upon request. These contain the primary elements of C7.1. The classified forests and wildlands web page, summarizes land as a whole and includes a section on certification. It also summarizes annual reports for all the program lands. Certified volumes harvested are reported on the certificate by category.
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	ICF 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. **Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.**		
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. **High Conservation Value Forests are those that possess one or more of the following attributes:** **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).**		
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.	C	
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 manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F. 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.	C	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 during mandatory tract inspections at least once every 5 years. Current list of assessed HCVF include adjacency and nearby attributes as determined by consultation with a number of resources but primarily databases maintained by the Division of Nature Preserves. The 2016 HCVF assessment report may be found here, http://www.in.gov/dnr/forestry/files/fo-2016_HCVF_ASSESSMENT.pdf. Those attributes determined as defining the adjacent or included HCVF are included in the mapping, and those attributes are included in the property Forest Management Plan although not explicitly identified as HCVF.

		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). While the information presented is sufficient to close the CAR for 9.1.a, FME should consider presenting summary information on completing indicators FF 9.1.b, 9.1.c and 9.2.a, and Criteria 9.3 and 9.4 at the next audit, if necessary. SCS notes that existing documents may serve to meet portions of the just mentioned indicators and Criteria but they do not yet exist in summary form.
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. **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.	C	The DoF, as manager of the group certificate, consulted with Nature Preserves, TNC, and other experts for identifying their current list of HCVF. The DoF has identified HCVF in adjacency to ICFCG member parcels. The Division Nature Preserves (DNP) of the DNR are independent of the Forestry Division. The Nature Preserves maintains RTE databases and related databases with public information available here, http://www.in.gov/dnr/naturepreserve/4725.htm. 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 experts, internal experts; and ground-truthing and surveys as determined necessary.
9.1.c A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan	C (OBS)	A summary of ecological communities or habitat types identified as HCVF, as well as a process for

summary that is made available to the public.		identifying HCVF as land is added to the certified group, is described in the Umbrella Plan, p.36. Although management strategies are generally described and understood there is not a summary of management strategies for HCVF by designation attributes in a summary document available to the public. One site inspected had an herbicide spray used for invasives with a HCVF site nearby, and although not impacting the attributes defining the HCVF, management strategies and protective measures specific to the defining attributes were unknown by forestry consultant. At a second site, an invasive species was present within the HVF that likely poses a risk and there were no management strategies clearly identified relative to the defined HCVF attributes. See **OBS 2016.3** for additional detail.
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	If potential HCVF are identified and require further analysis to be designated, the Stewardship Coordinator assembles an assessment committee to consult on the proposed areas and ensure HCVF are accurately identified. 2016: 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 forest management plans, and ongoing guidance in collaboration with staff from the Nature Preserves Division; and in consultation, for certain properties, with The Nature Conservancy. 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 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.	C	The Umbrella Plan describes general categories and measures for HCV management. Individual property 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.
9.3.b All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.	C	As described in the Umbrella Plan, all management activities described for HCVF should ensure their maintenance Field sites with, or near HCVF were visited in 2016. All activities were consistent with maintaining or enhancing the defining attributes.
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.	C	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.
9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or		

enhance the applicable conservation attributes.		
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. 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.	C	Monitoring of any HCVs located on group member FMUs is recorded on monitoring forms and tracked periodically. At the landscape level, DNR collects monitoring information of HCV attributes.
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.	C	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 year review by the forester, or during landowner communications of issues, or any issues that require a field visit. During each 5 year inspection cycle foresters check the database for HCVF. Interviews with District Foresters confirm knowledge of these procedures.
Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests. SCS has determined that FSC P10 does not apply since the Indiana Classified Forest Program employs only natural forest techniques.		

Appendix 6 – Chain of Custody Indicators for FMEs

[X] Chain of Custody indicators were not evaluated during this annual audit.

Appendix 7 – Group Management Program Members

All group members within the Indiana Certified Group are less than 1,000 hectares. The group member list is attached below.

FSC Certification
Member List.pdf

Appendix 8 – Group Management Programs

SCS audits Group entities and group members to the FSC Group Management Standard with the same frequency. All Principles in the FSC Forest Management Standard are evaluated – during the full evaluation or reevaluation audit and once again over the course of validity of the certificate during annual surveillance audits. SCS will also audit group clients to the Group Management Standard if there have been substantial changes to group management or the scope of the certificate during the previous year, such as a large change in the number of group members or changes to the policies of administering the group.

Group Management Conformance Table

Requirement	C/ NC	Comment/CAR
Group Management		
PART 1 QUALITY SYSTEM REQUIREMENTS		
C1 General Requirements	NE	
C2 Responsibilities	NE	
C3 Group entity's procedures		
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:		
I. Organizational structure;	NE	
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);	NE	
III. Rules regarding eligibility for membership to the Group;	NE	
IV. Rules regarding withdrawal/ suspension of members from the Group;	NE	
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;	C	The issuance of corrective actions and the decisions to create timelines to fulfill them are described beginning on p.7 of the Umbrella Plan. The Guidance table provides further description of how to issue corrective actions for specific nonconformities. In 2015-2016, following the 2015 audit, DNR revised the

		INFRMs database system to improve tracking of internal CARs. Auditor verified INFRMs implementation in the database for tracking such CARs and **closed OBS 2015.4**
VI. Documented procedures for the inclusion of new Group members;		This is included in the *Group Enrollment* section of the Umbrella Plan (p. 5).
VII. Complaints procedure for Group members.		Complaint procedure is in Umbrella Plan.
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.	NE	
3.3 The Group entity shall define the personnel responsible for each procedure together with the qualifications or training measures required for its implementation.	NE	
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 nonconformities 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. NOTE: for applicants complying with SLIMF eligibility criteria for size, the initial evaluation may be done through a desk audit.	NE	
C4 Informed consent of Group members	NE	
C5 Group Records		Documents: 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 (requirements); State Form 55101 (9-12) Green Certification Benefit Decision – opt in/out form (authorization, agree to comply membership, umbrella plan, FSC.
5.1 The group entity shall maintain complete and up-to-date records covering all applicable requirements of this standard. These shall include: 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	C	

monitoring by FSC, data should be stored centrally wherever possible.		
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.
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	Tracked in INFRMS. Examination in 2016 found that the documentation of trainings has not occurred since 2013 for 2/3 of the staff checked. **OBS 2016.5** Additional training/education for landowners is now available by YouTube series covering the entire process of forest management from timber harvest for landowners to a video of the mill of logs being processed into boards. DNR Fish and Wildlife also have educational videos.
iii. A map or supporting documentation describing or showing the location of the member's forest properties;	C	The location of group member properties is included on maps on pages 8 and 10 of 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.
iv. Evidence of consent of all Group members;	C	The signature page for consent is stored in each group member's file at district offices. Verified in 2016 by review of folders of the majority of sites visited.
v. Documentation and records regarding recommended practices for forest management (i.e. silvicultural systems);	C	Typical silvicultural systems are described in the Umbrella Plan (p.p. 12-16), 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 SMP.
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;		Annual Reports, correspondence, inspection and re-inspection reports, withdrawal forms, and certification departure requests are stored in district offices for each group member. Inspection and re-inspection reports list identified non-compliances and actions taken to correct non-compliances.
viii. Records of the estimated annual overall FSC production and annual FSC sales of the Group.	C	Tracked through annual reports as entered into INFRMS.
5.2 Group records shall be retained for at least five (5) years.	C	The 5 year requirement is stipulated for COC procedures in the Umbrella Plan for group members conducting certified sales.

		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.
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.	C	ICF does not issue any kind of certificates or declarations to its group members that could be confused with FSC certificates.
PART 2 GROUP FEATURES		
C6 Group Size	NE	
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	NE	
C9 Sales of forest products and use of the FSC trademark	NE	