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Ver 25 October 2018

FSC Forest Management Certification

2nd surveillance

Report for:

The Nature Conservancy

in

Arlington, Virginia USA

Report Finalized:	March 5, 2020
Audit Dates:	Sept. 30-Oct. 2; Oct. 28-30; Dec. 3-6, 2019
Audit Team:	Charles Levesque, Lead Auditor
Type of certificate:	Group
Certificate code:	NC-FM/CoC- 000238
Certificate issue/expiry:	March 9, 2023
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INTRODUCTION

This report presents the findings of an independent certification audit conducted by a team of specialists representing NEPCon. The purpose of the audit was to evaluate the ecological, economic and social performance of The Nature Conservancy (TNC) forest management as defined by the Principles and Criteria established by the Forest Stewardship Council™ (FSC®).

This report contains various sections of information and findings and several annexes. Sections 1-4 of the report will become public information about the forest management operation and may be distributed by NEPCon or the FSC to interested parties. The remainder of the annexes are confidential, to be reviewed only by authorized NEPCon and FSC personnel bound by confidentiality agreements. A copy of the public summary of this report can be obtained on the FSC website at <http://info.fsc.org/>.

Dispute resolution: If NEPCon clients encounter organisations or individuals having concerns or comments about NEPCon and our services, these parties are strongly encouraged to contact relevant NEPCon regional office. Formal complaints and concerns should be sent in writing.

Impartiality commitment: NEPCon commits to using impartial auditors and our clients are encouraged to inform NEPCon management if violations of this are noted. Please see our Impartiality Policy here: <http://www.nepcon.org/impartiality-policy>

Standard Conversions

1 mbf = 2.4 m³

1 cord = 3.6 m³

100 tons hardwood = 97 m³

100 tons = 101 m³

1 acre = 0.404687 hectares

1 AUDIT CONCLUSIONS

1.1 Audit Recommendation and certification decision

Based on Organisation's conformance with certification requirements, the following recommendation is made:

Certification approved:

- Upon acceptance of NCR(s) issued below

Certification not approved:

-

Additional comments, including issues identified as controversial or hard to evaluate and explanation of the conclusion reached:

The TNC FSC Group is very large and getting larger both in terms of members and acreage. To date the Group Manager and the organization of the Group has been exemplary. With the additions of some large group members prior to this audit, this has put constraints in the system but the Group Manager has identified this and put in place professional field personnel to oversee the new complexities that the expansion of the Group has brought on.

1.2 Non-conformity Reports (NCRs)

Note: NCRs describe evidences of Organisation non-conformities identified during audits. NCRs include defined timelines for the Organisation to demonstrate conformity. MAJOR NCRs issued during assessments/reassessments shall be closed prior to issuance of certificate. MAJOR NCRs issued during anual audits shall be closed within timeline or result in suspension.

- Check if no NCR(s) have been issued

NCR: 01/20	NC Classification: minor
Standard & Requirement:	NEPCon Certification Standards—NTPF Addendum—Maple Sugar: Non-Timber Forest Products Addendum for the Certification of Maple Sugaring Operations- August 2012 version
Report Section:	Annex II
Description of Non-conformance and Related Evidence:	
Requirement: <i>Indicator 5.6.MAPLE3</i>	

Allowable tapping rates and sap harvest rates and best management practices shall be followed in the forest.

Verifiers:

- *Trees smaller than the minimum allowable tapping diameter are not tapped.*
- *Number of taps used per size class follows management prescription.*
- *Use of paraformaldehyde pellets or other chemicals in tap holes is prohibited.*
- *Taps are immediately pulled from trees at the end of the sugaring season.*
- *Tap holes are drilled with a slight upward angle and are not excessively deep (i.e., exceed 2.5 inches in depth).*
- *"Cluster tapping" is not practiced.*

Drop lines on tubing systems are of sufficient length to preclude cluster tapping (i.e., the drop line is long enough so that the tap can reach all sides of the tree and can be placed sufficiently above or below old tap holes).

Finding: The lease maple operator has a contract for operations on the FMU that includes tapping requirements (TNC Maine contract with Gold Sugar Bush Inc.). The tapping requirements do not allow for trees to be tapped if under 10 inches in diameter and specifies number of taps per tree depending on size, tap hole depth as well as tap hole separation from season to season on individual trees among many other details. These are all industry standard techniques. During the field audit, the auditor made measurements of tree sizes, tap hole depths, drop line length and tap hole separation on the section that has been tapped two years. The results of that inspection showed a small number of trees tapped that were between 9 and 10 inches in diameter and tap hole separation inconsistent with requirements of the contract and with the verifiers in this Indicator.

Corrective action request:	Organisation shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the non-conformance.
Timeline for Conformance:	By the next annual surveillance audit, but not later than 12 months from draft report (January 22, 2021)
NCR Evaluation Type	On-site <input type="checkbox"/> Desk Review <input checked="" type="checkbox"/>
Evidence Provided by Organisation:	Since the audit and before this report draft was completed, the FMU manager has adopted a new maple area management plan which includes new tapping requirements. This new plan has been incorporated into a new lease agreement with the maple vendor. Additionally, training has occurred since the field audit of that FMU and the end of this audit to assure the new tapping requirements will be followed in the 2020 tapping season. Evidence if this training was provided by the manager.
Findings for Evaluation of Evidence:	The FMU managers correctly identified the root cause of this NCR as lack of training for those implementing the maple operation. The new maple forest management plan and tapping requirements are consistent with the Maple Standard and, when implemented by the newly trained staff, will likely result in conformance during the upcoming

	tapping season. This evidence is sufficient to close this NCR. These same issues should be verified in subsequent field audits.
NCR Status:	CLOSED
Comments (optional):	

1.3 Observations

Note: Observations are issued for the early stages of a problem which does not of itself constitute a non-conformance, but which the auditor considers may lead to a future non-conformance if not addressed by the organization; observations may lead to direct non-conformances if not addressed.

No observations

OBS: 01/20	Standard & Requirement:	NEPCon COC Standard for FME, Indicator 2.1
	Report Section	Annex III
Description of findings leading to observation:	<p><u>Requirement:</u> COC 2.1: FME shall have a CoC control system in place to prevent the mixing of non-FSC certified materials with FSC certified forest products from the evaluated forest area, including:</p> <ul style="list-style-type: none"> a) Physical segregation and identification of FSC certified from non-FSC certified material. b) A system to ensure that non-FSC certified material is not represented as FSC certified on sales and shipping documentation. <p>Finding: The Highland and Ataya FMUs in VA and TN/KY have many excised acres due to mining and gas wells. The FMUs harvest in those areas or in new areas for mining and drilling when acres are removed from the certificate. The proximity of those sales to certified property areas on these FMUs lend themselves to risk associated with mixing non-FSC timber with FSC timber if care is not taken. No issues of non-conformance were observed during the audit in this regard but on one active timber sale on adjacent excised acreage on the Highland FMU (VA), the on-the-ground manager could not show where the FSC certified lands were relative to the</p>	

	portion of the FMU that was removed from the certificate due to the proposed mining/well drilling. The GIS dataset for the property includes all excised areas from the certificate as a data layer but that data was not being used fully in the field to assure all risk was removed from the situation relative to mixing of non-certified with certified timber.
Observation:	FME should ensure continued conformance with Indicator COC 2.1

OBS: 02/20	Standard & Requirement:	FSC-US Forest Management Standard (v1.0); Indicator 5.6.a
	Report Section	Annex I
Description of findings leading to observation:	<p><u>Requirement:</u> Indicator 5.6.a <i>In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.</i></p> <p><i>The sustained yield harvest level calculation for each planning unit is based on:</i></p> <ul style="list-style-type: none"> • <i>documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions;</i> • <i>mortality and decay and other factors that affect net growth;</i> • <i>areas reserved from harvest or subject to harvest restrictions to meet other management goals;</i> • <i>silvicultural practices that will be employed on the FMU;</i> • <i>management objectives and desired future conditions.</i> <p><i>The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.</i></p> <p>Finding: On the Capital Water Authority FMU (PA), the forester consultant has developed a methodology to calculate the sustained yield harvest level that is consistent with the indicator requirements, however, due to past practices and the silvicultural objectives, the harvest levels are projected to be above net growth over the next ten years. The levels to date have been under net growth.</p>	

	On Bethlehem Water Authority, the interview with the contract forest manager and FMU employees as well as TNC coordinator suggested that when the forest carbon project on the property was consummated in 2013, a full sustained yield analysis was completed, but the documentation was not found. Further, the carbon project company used by the FMU provided some historical info that showed the sustained yield level and harvests since have been consistent with that calculated level, all of which appear to be reasonable given the auditor observations in the field and interviews with the FMU related personnel.
Observation:	FME should ensure continued conformance with Indicator 5.6.a.

OBS: 03/20	Standard & Requirement:	FSC-US Forest Management Standard (v1.0); Indicator 7.2.a
	Report Section	Annex I
Description of findings leading to observation:	<p><u>Requirement:</u> <i>Indicator 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.</i></p> <p>Finding: A new FMU group member in Tennessee (Sewanee) has a newly updated forest management plan in conformance with the indicator. The forest inventory associated with and described within the plan is from 2003 – way beyond the required update of every 10 years as required by this indicator. As part of regular forestry work with the students at the FMU school, updates to the inventory have been taking place on some of the forest compartments, but a full update is not yet complete and it is not clear how or whether the new updated inventory information is being used to make management decisions. The 2003 inventory has been grown forward through a computer model but this did not include the newer inventory data as far as the auditor could tell.</p>	
Observation:	FME should ensure continued conformance with Indicator 7.2.a.	

OBS: 04/20	Standard & Requirement:	FSC-US Forest Management Standard (v1.0); Indicator 4.2.b
	Report Section	Annex I

Description of findings leading to observation:	<p><u>Requirement:</u></p> <p><i>Indicator 4.2.b The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.</i></p> <p>Finding: There were a few instances of gaps in safety.</p> <ul style="list-style-type: none"> • On a smaller FMU (Hiawatha, PA) including interviews that indicated proper safety equipment may not have been used on an operation. • On a Pennsylvania FMU (Bethlehem) and a Tennessee site (Ataya), fire suppressors or extinguishers were not found on all pieces of equipment. • At the PA FMU, there was also no first aid kit found on site. <p>These appear to be isolated gaps that have been quickly responded to. For example, for the Pennsylvania FMU, photographic evidence prior to report drafting was provided to the auditor that showed required safety equipment with the logging operation described in finding above. Therefore, this is being issued as an OBS and will be closing evaluated during future audits to determine if this is a systemic issue that needs to be addressed via an NCR.</p>
Observation:	FME should ensure continued conformance with Indicator 4.2.b.

1.4 Stakeholder consultation

No formal stakeholder notification was conducted as part of this audit. Specific stakeholders were contacted to gather evidence on conformance with the FSC standards evaluated during this audit.

Stakeholder Type (NGO, government bodies, local inhabitant, contractor etc.)	Stakeholders consulted directly or provided input (#)
National/International ENGOS	3
Government Agency representatives	8
Local resource users (trappers, hunt & fish clubs, etc.)	1
Contractors	8
Workers	28

The table below summarizes the issues identified by the audit team with a brief discussion of each based upon specific interview and/or public meeting comments.

Principle/Subject Area	Stakeholder comment	NEPCon response
P1: FSC Commitment and Legal Compliance	There were no legal compliance issues in any of the 3 regions covered in this audit according to enforcement personnel in five states contacted.	No response needed.
P2: Tenure & Use Rights & Responsibilities	One leaseholder said that the relationship between him and the FMU manager in Virginia was a good one and that the lease arrangement worked well`	No response needed.
P3 – Indigenous Peoples’ Rights	There were no comments received from stakeholders on this Principle.	N/A
P4: Community Relations & Workers’ Rights	Interviews conducted with foresters and loggers contracted with by FMUs in the group showed good worker/contractee relationships in all cases.	No response needed.
P5: Benefits from the Forest	There were no comments received from stakeholders on this Principle.	N/A
P6: Environmental Impact	Telephone interviews with many state enforcement personnel yielded no concern for environmental impacts of various FMUs sampled in this audit.	No response needed.
P7: Management Plan	There were no comments received from stakeholders on this Principle.	N/A
P8: Monitoring & Assessment	There were no comments received from stakeholders on this Principle.	N/A
P9: Maintenance of High Conservation Value Forest	There were no comments received from stakeholders on this Principle.	N/A
P10 - Plantations	N/A	N/A

1.5 Actions taken by Organisation Prior to Report Finalization:

None

2. AUDIT PROCESS

2.1 Certification Standard Used

Standards Used:	FSC-US Forest Management Standard (v1.0); NEPCoC Standard for FME; FSC-STD-30-005 Group Certification Standard
Local Adaptation: (if applicable)	

2.2 Audit Team and accompanying persons

Name	Role and qualifications
Charles Levesque, Lead Auditor	President, Innovative Natural Resource Solutions LLC (founded 1994). Education: B.S.F. in forest management from University of New Hampshire, 1979; ISO 14001 Lead Auditor Training, 2000. Certifications: RABQSA – Lead EMS Auditor – Environmental; Society of American Foresters Certified Forester and Certified Forest Auditor; New Hampshire Licensed Forester #281. Over 35 years of experience in forestry, natural resource consulting, natural resource non-profit management and environmental auditing. Co-author of “Forest Certification Auditing” published by the Society of American Foresters. Has lead or conducted sustainable forest management auditing on over 5 million acres in North American under the Sustainable Forestry Initiative, Forest Stewardship Council and American Tree Farm System since the late 1990s and has lead over 100 chain-of-custody under SFI, FSC and the Program for the Endorsement of Forest Certification.

2.3 Audit Overview

Note: The table below provides an overview of the audit scope and auditors. See standard checklist annex for specific details on people interviewed and audit findings per site audited.

Site(s)	Date(s)	Main activities	Auditor(s)
Auditor office	9/20 – 12/11, 2019	Review of evidence	Charles Levesque
Multiple (ME, PA, TN)	Oct 1, Oct 29, Dec. 3, 2019	Opening meeting	Charles Levesque
ME, PA, TN, KY, VA	Oct 1-2; Oct 29-30; Dec. 3-6, 2019	Field Visits	Charles Levesque

Auditor office and field	Oct. 1 – Dec. 6, 2019	Staff and Stakeholder interviews	Charles Levesque
TN	Dec. 6, 2019	Closing meeting	Charles Levesque
Total auditing time used (number in person days based on 8 hour working days): 12			

2.4 Description of Overall Audit Process

FSC sampling rules were used to select forest management units (FMUs) to be visited for this audit. There were 22 FMUs in the certificate at the time of the audit. The FMUs were divided into subsets of like FMUs based on size and whether they were new to the group or not. Size classes were (>10,000 ha) and medium (<10,000 ha). Note: There are some small (<1000 hectare) properties included in the medium subsets. FSC allows small FMUs to be included in the medium (1,000-10,000ha) size class for sampling in order to provide more flexibility on selecting FMUs to visit. The Maple Standard field audit was concentrated on the maple lease area of the Maine TNC FMU. This area nearly 2,000 acres and a 2 acre site where the lessee built sugar house and other equipment is located. Field audit included the sugar house area and more time in the sugarbush itself, check sampling the tapping, tubing, sap collection system and some thinning work conducted there. Maple Syrup field audits were completed in October 2018 (as part of the 2019 FSC FM audit) and again October 2019 (during this audit).

Description of Subset	# FMUs in subset	Minimum # FMUs to visit	Actual # FMUs visited	Notes/Comments
existing large	2	2	2	
existing med	17	4	4	
new large	2	2	2	
new med	1	1	1	

2.4.1 Changes in FMEs' forest management and associated effects on conformance to standard requirements

Since the last audit three new FMUs were added (Ataya, Highlands & Sewanee) in TN, KY and VA. Given the Type I nature of the group, all three FMUs bring new forest managers to the group. The Ataya and Highlands are very large FMUs in the region of the U.S. where mining/gas and oil rights are separated from the fee owners rights. These two properties are in this category. This provides for extra complexity in assuring conformance to the FSC Standards. The FME/Group Manager has put into place local managers working for the FME (TNC) to oversee these group member forest managers, which will help in assuring conformance.

2.4.2 List of FMUs selected for evaluation

FMU Name	Rationale for Selection
Upper St. John River (USJ) (ME)	Large FMU
Appalachian Mountain Club (AMC) (ME)	Large FMU
Highlands (VA)	New large FMU
CF Ataya (TN/KY)	New large FMU
Sewanee (TN)	New medium FMU
Hawk Mountain Sanctuary (PA)	Existing medium FMU

Capital Region Water (PA)	Existing medium FMU; publicly owned
Bethlehem Authority (PA)	Existing medium FMU; publicly owned
Hiawatha, (PA)	Existing medium FMU

2.4.3 Review of FME Documentation and required records

a) All certificate types

Required Records	Reviewed
Complaints received by FME from stakeholders, actions taken, follow up communication	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: There are written records of some land ownership disputes and other disagreements. All of these cases are being covered adequately by FMU managers and legal teams.	
Accident records	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: There were no accidents of any consequence on the sampled FMUs since the last audit.	
Training records	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: All managers and staff keep training records and these were viewed by the auditor.	
Operational plan(s) for next twelve months	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: Operational plans are available for the FMUs and were reviewed by the auditor during the audit. A few of the smaller FMUs are not planning field actions in the coming year.	
Inventory records	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: Inventory records are generally found within the forest management plans of the FMUs and in a few cases through separate documents and electronic files. These were viewed during the audit.	
Harvesting records	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: Where harvests have taken place, group FMUs keep good records of timber harvested by volume, species and product and these data were reviewed by the auditor.	

b) FSC Group Certificates

Required Group Records	Reviewed
Group management system	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: Group management system policies and procedures reviewed. These have not changed since the last audit.	
Rate of membership change within the group	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: Records reviewed for the change in group members since the last audit.	
Formal communication/written documentation sent to members by the group entity during the audit period	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: The Group Manager held two webinars for group members since the last audit and had written communications – all viewed by the auditor.	
Records of monitoring carried out by the group entity	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: The Group Manager kept up the sampling of existing member monitoring since the last audit plus the additional field review of the new members entering the group.	
Records of any corrective actions issued by the group entity	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Comments: One formal corrective action was issued for the group and was reviewed by the auditor.

Updated list of group members

Yes No

Comments: The updated list of group members is included in Annex V of this report.

3. COMPANY DETAILS

3.1 Certificate Scope

Forest management enterprise information:			
FME legal name:	The Nature Conservancy		
FME Certificate Code:	NC-FM/CoC – 000238		
Reporting period	Previous 12 month period	Dates	Jan 1 2018 – Dec 31 2018

1. Scope Of Certificate	
Type of certificate: group	SLIMF Certificate: not applicable
New FMUs added since previous evaluation	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Group Certificate: Updated of FMU and group member list provided in Appendix VII-a: three new FMUs were added there since the last audit: Sewanee, CF Ataya & CF Highlands and another group member, Gold Sugar Bush, a maple products lease in Maine, was added as a member but owns no land.	

2. FME Information	
<input type="checkbox"/> No changes since previous report (if no changes since previous report leave section blank)	
Forest zone	Temperate, hemi-boreal
Certified Area under Forest Type	
- Natural	252,321 hectares
- Plantation	0 hectares
Stream sides and water bodies	4219 Linear Kilometers

3. Forest Area Classification		
<input type="checkbox"/> No changes since previous report (if no changes since previous report leave section blank)		
Total certified area (land base)	252,321ha	
1. Total forest area	238,025ha	
a. Total production forest area	170,010ha	
b. Total non-productive forest area (no harvesting)	68,015ha	
- Protected forest area (strict reserves)	51,324ha	
- Areas protected from timber harvesting and managed only for NTFPs or services	4313 ha	
- Remaining non-productive forest	12,378 ha	
2. Total non-forest area (e.g., water bodies, wetlands, fields, rocky outcrops, etc.)	14,296ha	

4. High Conservation Values identified via formal HCV assessment by the FME and respective areas			
<input type="checkbox"/> No changes since previous report (if no changes since previous report leave section blank)			
NOTE: only new HCVs are report here			
Code	HCV TYPES ¹	Description:	Area
HCV1	Forest areas containing globally, regionally or nationally significant concentrations of	Ataya - Concentrations of aquatic RTE species	932 ha

¹ The HCV classification and numbering follows the ProForest HCVF toolkit. The toolkit also provides additional explanation regarding the categories. Toolkit is available at <http://hcvnetwork.org/library/global-hcv-toolkits>.

	biodiversity values (e.g. endemism, endangered species, refugia).	including Blackside Dace and Cumberland Arrow Darter; Concentrations of bat habitats and use including Indiana bat and Northern Long-eared bat Highlands - Concentrations of aquatic/terrestrial RTE species including Virginia spirea and Clinch dace Sewanee – rare flower populations and species associated with karst	595 ha 73 ha
HCV2	Forest 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.		0 ha
HCV3	Forest areas that are in or contain rare, threatened or endangered ecosystems.	Highlands – rare ecosystem containing high concentration of butternut Sewanee - There are pockets of forest on the property that are in late successional stages likely demonstrating climax, or old growth, forest characteristics. There is also a unique assemblage of mature upland and mesic plateau forest.	1 ha 351 ha
HCV4	Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Sewanee - 4.1 The reservoirs on the property contribute to the local community drinking water supply, thus will be buffered and extra precautions will be used if activities are prescribed for these areas. These areas include areas around	129 ha

		Lake Jackson and Lake O'Donnell.	
HCV5	Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		0 ha
HCV6	Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		0 ha
Number of sites significant to indigenous people and local communities			none new

5. Workers

Number of workers including employees, part-time and seasonal workers:

Total number of workers	98workers	
- Of total workers listed above	79Male	19 Female
Number of serious accidents	0	
Number of fatalities	0	

6. Pesticide Use --

FME does not use pesticides. (delete rows below)

FME has a valid FSC derogation for use of a highly hazardous pesticide YES NO

FSC highly hazardous pesticides used in last calendar year **N/A**

Name	Quantity (liters)	# of Hectares Treated ha
Non FSC highly hazardous pesticides used in last calendar year (See attached list)		
Name	Quantity (liters)	# of Hectares Treated
Accord	1.06	1.12
Accord	0.83	0.22
Garlon 3A	7.19	8.5
Garlon 3A	5.68	6.07
Garlon 3A	1.9	0.28
Accord	0.31	0.12
Accord	0.11	3.7
Accord	0.07	0.01
Accord	0.74	8.05
Accord	0.4	0.4
Accord	0.46	2.43
Accord	0.61	1.12
Garlon 3A	3.8	0.66
Accord	0.19	0.22
Garlon 3A	1.9	0.59
Accord	0.06	0.05
Imidacloprid	66.7	72
Triclopyr 3	17	5.1
Triclopyr 4 and Imazapyr 4	92	10.4
Triclopyr 4 and Imazapyr 4	240	157.2
Glyphosate 4+	12	0.8
glyphosate	18.93	12.55
imazapyr	1.89	12.55
sulfometuron	1.36	12.55

3.1.1. Exclusion of areas from the scope of certificate

X	A. Applicability of FSC excision policy
<input type="checkbox"/>	All forest land owned or managed by the FME is included in the scope of this evaluation.
<input checked="" type="checkbox"/>	Is any portion of the forest management unit (s) under evaluation for certification being removed or excised from the scope of the evaluation, or have been excised in the past? If yes, complete section below. Conformance with FSC-POL-20-003 The excision of areas from the scope of certification shall be documented.
B. AREAS REMOVED OR EXCISED FROM SCOPE OF EVALUATION [Excisions are when the certificate holder decides to isolate/separate a part of a FMU(s) from the scope of certificate because this area cannot meet the FSC requirements for reasons either within or beyond their control. Nurseries, areas within the FMU that are influenced / affected by activities from other users that result in non-compliance with FSC requirements (ex. Oil and gas, powerline ROWs, commercial gravel, etc.) are some examples of areas needing to be excised.]	
<input checked="" type="checkbox"/> The FME indicated it is excising new areas from FMU(s) included in the scope of the certificate? Complete ALL sections below.	
<input checked="" type="checkbox"/> The FME previously excised areas from FMU(s) included in the scope of the certificate prior to the last assessment/audit, and conformance with FSC-POL20-003 was evaluated? If yes complete sections 2 and 3 below.	
<input type="checkbox"/> Have any changes in FMU landbase been made since the last assessment/audit which are not in conjunction with forest management activities / not under the FME's control (ex. converted to non-forest use/ legal change in tenure)? If so, complete section 3.	
<p>1. Rationale for new excision of area from FMU(s) included in scope of evaluation: <u>Finding:</u> In Tennessee, Kentucky and Virginia, where two new group FMUs are located, 9254.85 ha have been excised from the group certification area because these areas are either being mined or drilled for gas wells (or have previously been mined or drilled). The breakdown of the excised areas is as follows:</p> <ul style="list-style-type: none"> - Ataya – 191.91 ha excised from Tennessee and Kentucky - Highlands – 9062.94 ha excised from Virginia. <p>The FME has these areas specifically identified within the GIS system covering these FMUs.</p> <p>In addition to the new exclusion of acreage described above, prior to this audit the FME (Group Manager) had excised other areas described as follows. An approximately 1.22 ha (3-acre) area of access road and site for a leased sugar house on the Upper St. John group member property in Maine was excised at the time of this audit. Additionally, in Maryland, 8 ha was previously excised from TNC's certificate because they are in a utility right-of-way. The rationale for removing this area from the certificate had to do with the fact that it was difficult getting timely information about herbicide use in the right-of-way. Six hectares have been excised from Bethlehem Authority because they were cleared for meteorological towers for potential wind development.</p>	
<p>2. Summary of conformance evaluation against requirements of FSC-POL-20-003: <u>Finding:</u> Principal requirements of FSC-POL-20-003 have been met. Areas excised are subject to legal rights of others over which TNC has no control. These include a leased sugar house area, a utility right-of-way (Nasswango Creek) and clearing for meteorological towers on the Bethlehem Authority FMU and areas for mining and gas wells (Ataya in KY and TN and Highlands in VA). Activities on excised areas do not prevent conformance with the FSC Standard on the remaining areas of the FMU. The boundaries of the excised areas are mapped in the GIS system and are marked at the time timber is harvested near the limits of the excised area.</p>	

3. Control measures to prevent contamination of certified wood with wood from excised/removed forest areas:

Finding: On some properties with excisions, there is no more wood harvested: from the sugar house and access road that was cleared in Maine before the audit this year; from right-of-ways that are managed by utilities; and the meteorological towers areas are cleared and will be maintained with no trees. For Ataya and Highlands there continues to be timber harvested on excised areas and one was observed in Tennessee on the Ataya property. Non-certified FMUs are physically separate from the certified FMUs in the GIS system and if any timber is harvested on non-certified areas, TNC's COC procedures ensure that there will be no contamination and no FSC code and claim included with such sales. For the Ataya non-certified area being harvested, a contract that explicitly stated that the timber was non-FSC certified was viewed by the auditor.

4. AUDIT AND NON-CONFORMITY FINDINGS

4.1 Audit Background

Has the management system changed since the previous evaluation:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If yes, briefly review the changes: Three new FMUs were added to the group and with that three new managers since this is a Type I group. The remaining FMUs have not changed.	
Have there been any complaints, disputes, or allegations of non-conformity with the standards raised against the Organisation during the audit period:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If yes, reference standard and criteria where corresponding findings are found in report: For the new Highlands FMU, a series of disputes with abutters and others over ownership boundaries are being worked through with the assistance of the FMU owners' lawyers. A full written accounting of those disputes was provided to the auditor. There are no nonconformances identified with this issue.	

4.2 Evaluation of Open Non-conformity Reports (NCRs)

Note: this section indicates the Organisation's actions to comply with NCRs that have been issued during or since the last audit. Failure to comply with a minor NCR results in the NCR being upgraded to major; the specified follow-up action is required by the Organization or involuntary suspension will take place.

Status Categories	Explanation
CLOSED	Operation has successfully met the NCR
OPEN	Operation has either not met or has partially met the NCR

Check if N/A (there are no open NCRs to review)

Annex I redacted for confidential information.

Annex II: NEPCon Certification Standards—NTPF Addendum—Maple Sugar

Non-Timber Forest Products Addendum for the Certification of Maple Sugaring Operations- August 2012 version

<i>Criteria and Indicators</i>	<i>Findings</i>
PRINCIPLE #1: COMPLIANCE WITH LAWS AND FSC PRINCIPLES	
Criterion 1.1 Forest management shall respect all national and local laws and administrative requirements.	
<p>Indicator 1.1. MAPLE1 Maple tapping and processing equipment, processing methods and transport meet all applicable international, national and local laws governing licenses fees, sanitation standards, quality control, and packaging and labeling requirements.</p> <p><i>Verifiers:</i> <i>The sugarmaker adheres to national and state laws governing acceptable syrup density, color grading, packing and labeling regulations and other relevant laws.</i> <i>The sugarmaker maintains an up-to-date color kit and an accurate, periodically tested hydrometer.</i> <i>Enrollment in organic or state certification program (e.g., Vermont’s “Seal of Quality” program).</i> <i>No formal complaints have been filed with the sugarmaker about product quality.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The operations meet the requirements of Maine laws – the governing laws for this operation. This includes requirements in the sugar bush and in the sugar house. Maine regulations focus on sugar house issues: sanitary operations; assuring syrup meets Brix requirements and storage. Additionally, this new sugar house has siting issues with the Maine Land Use Planning Commission and water quality and hazardous liquids (propane, diesel and heating oil) requirements. All operations meet requirements.</p> <p>The auditor found no formal or informal complaints about the operation as a result of interviews conducted.</p>
<p>Indicator 1.1. MAPLE2 For comestible items, management undertakes proactive product quality control actions to insure its products pose no health risks to the final consumer.</p> <p><i>Verifiers:</i> <i>If a defoamer is used in the sugaring shed, it meets organic certification standards;</i> <i>Cleaning practices do not introduce agents or chemicals not recognized or approved for cleaning of equipment used in the processing of food products;</i> <i>Sugarmakers have their syrup independently tested for lead contamination over a period of at least three years unless they can demonstrate that equipment does not present a health risk;</i> <i>Use of paraformaldehyde pellets or other chemicals in tap holes is prohibited.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The producer has a brand new sugar house with all the up-to-date equipment from reverse osmosis to evaporator to finishing and packing equipment. Defoamer used is organic as verified by the auditor in October of 2019 at the sugar house. There is no lead in equipment as all the equipment/machines are stainless steel and up to date. Once taps are pulled in the spring there are no chemicals used in tap holes.</p> <p>This is a new, modern, clean operation working according to the highest standards in the industry today.</p>
Criterion 1.2 All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	
Indicator 1.2. MAPLE	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

<p>The FMO or NTFP harvester(s) maintains up-to-date harvesting permits, collecting licenses, collecting contracts or cultivation permits and pays any fees, leases, royalties, etc. in a timely manner.</p> <p><i>Verifiers:</i> Any invoices for purchasing sap/syrup from other sugarmakers or lease fees to tap trees on land not directly owned by the sugarmaker are up-to-date in payment.</p>	<p>Lease contract between Gold Sugar Bush and TNC signed and in force that includes the lease information, maple management plan and tapping standards and all facets of the operation. Also produced was the up-to-date license issued by the State of Maine.</p>
<p>PRINCIPLE #2: TENURE AND USE RIGHTS AND RESPONSIBILITIES</p>	
<p>Criterion 2.3 Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p>	
<p>Indicator 2.3.MAPLE Any conflicting claims over traditional access to sugaring stands is being addressed in a systematic and effective manner.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> There are no claims over traditional access to sugaring stands on FME lands subject to maple lease from TNC to Gold Sugar Bush. All the lands are open to the public.</p>
<p>PRINCIPLE #3: INDIGENOUS PEOPLES' RIGHTS</p>	
<p>Criterion 3.3 Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</p>	
<p>Indicator 3.3.MAPLE Sites, as well as plants and animal resources of cultural and religious significance shall be identified and protected during sugaring activities.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> There are no areas of plant or animal resources of cultural and religious significance in the maple stands being tapped according to the FME who has done surveys of their entire Maine ownership.</p>
<p>PRINCIPLE #4: COMMUNITY RELATIONS AND WORKER'S RIGHTS</p>	
<p>Criterion 4.1 The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</p>	
<p>Indicator 4.1.MAPLE When hiring for sugaring operations, local communities and residents shall be given first preference for jobs involving sugarbush thinning, tapping, processing, packing or sale of maple products</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Employee records provided by lease maple operator show all employees are from just over the border in Quebec – they are all very local to the maple operation on the TNC Group FMU.</p>
<p>Criterion 4.2 Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	
<p>Indicator 4.2.MAPLE1 Hired help for sugarbush management, tapping or work in the evaporating shed or sales area shall be fairly compensated in accordance with local laws and norms.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> According to FMU personnel, employees are all compensated at industry standards and are provided benefits. Outside of the lease owners, employees were not onsite or available for interview for these audits because all but one are seasonal.</p>
<p>Indicator 4.2.MAPLE2 Sugarbush and evaporator workers shall be provided with insurance to cover any work related injuries.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Proof of insurance was provided during the audit. FMU lease contract with maple operation requires insurance for liability and workers compensation.</p>
<p>Indicator 4.2.MAPLE3 The sugarbush manager shall keep an up-to-date log of the in-kind labor performed managing the sugar bush; people hours and relationship to the producer are recorded; and bartered services identified and recorded.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> According to the lease sugaring operation owner, there are no bartered services provided the operation. All labor is through paid labor with benefits.</p>

Criterion 4.4 Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.	
Indicator 4.4.MAPLE1 Forest manager can demonstrate they have communicated in advance management activities to neighbours, local communities and other groups and individuals when sugarbush management or processing activities have the potential to negatively impact them.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The sugarbush area is remote and areas tapped within FMU ownership are well within the property and so there are no neighbors, local communities or other groups outside the property affected by the sugaring operation. The only people that may come in contact are recreationists through the North Maine Woods recreational operation but there are no formal recreation sites nearby so the likelihood of contact is remote.
Indicator 4.4.MAPLE2 Large-scale sugaring operation shall communicate management activities to affected communities in public meetings, mailings or other types of communications in advance when harvest or processing activities has the potential to impact local communities.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The sugarbush area is remote and areas tapped within FMU ownership are well within the property and so there are no neighbors, local communities or other groups outside the property affected by the sugaring operation.
PRINCIPLE # 5: BENEFITS FROM THE FOREST	
Criterion 5.2 Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.	
Indicator 5.2.MAPLE Forest managers shall keep up-to-date on sugarbush management and syrup processing developments and technology.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The lease maple operator has one of the leading maple companies – CDL - under contract and keeps up to date with all tech and new developments through them. A field visit of the sugar house showed all brand new technology and latest hardware. Operator was well informed when interviewed. Note: owner/operator is only French speaking and an interpreter was used during on-site interviews.
Criterion 5.3 Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	
Indicator 5.3.MAPLE1 Sap collection equipment shall be installed with minimal damage to trees and other resources and tubing and other material disposed of offsite upon completion of its useful life.	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Field evidence observed during the field audit in October 2018 and again in October 2019 showed good tapping techniques and minimal damage to trees in the sugarbush. This is a modern operation using the latest tubing and tapping techniques.
Indicator 5.3.MAPLE2 Maple sap gathering infrastructure (i.e. collection pipelines) and management activities do not negatively impact wildlife populations or other forest resources. <i>Verifiers:</i> <i>Mainline systems are installed in an appropriate and recognized manner and do not obstruct movement of wildlife populations e.g. block established travel corridors</i> <i>Sap collection pipeline is removed immediately after sap season if areas of large mammal travel paths are obstructed.</i> <i>Cleaning practices do not introduce into the environment agents or chemicals not recognized or approved for sugar bush use.</i>	Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> There are no known major wildlife movement corridors associated with the maple operation on the FMU property. The movement of only two species can be affected by sugaring in this geography – white-tailed deer and moose – and they are able to move around this area if mainline and other tubing limits their movement within the sugarbush area. Sign (tracks and scraps and rubs) of both species were seen within the sugar bush during the field audit.

Criterion 5.6 The rate of harvest of forest products shall not exceed levels which can be permanently sustained.	
<p>Indicator 5.6 MAPLE1 The intensity, frequency and seasonality of sap harvest, by area and volume, shall be based on a combination of scientific study and/or long-term local experience and knowledge and does not exceed sustainable levels.</p> <p><i>Verifiers:</i> <i>The area of the sugarbush is delineated on maps and the estimated number of taps used within the area is documented;</i> <i>Minimum tapping diameter and the number of taps used per size class are documented;</i> <i>Tapping guidelines following a recognized and appropriate system will be adopted and adhered to.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The area of the sugarbush is outlined carefully on maps provided by the sugaring operator and a documentation of tap number and harvested sap volumes was provided. Tapping guidelines within sugaring operator contract with the FMU require trees to be at least 10 inches at DBH for one tap. 16 inch and up trees may receive a second tap. These are industry standard requirements.</p> <p>The lease maple operator has a contract for operations on FMU with FMU that includes tapping requirements (TNC Maine v. Gold Sugar Bush Inc.). The tapping requirements do not allow for trees to be tapped if under 10 inches in diameter and specifies number taps per tree depending on size, tap hole depth as well as tap hole separation from season to season on individual trees among many other details. During the field audit, the auditor made measurements of tree sizes, tap hole depths, drop line length and tap hole separation on the section that has been tapped two years. The results of that inspection showed a small number of trees tapped that were between 9 and 10 inches in diameter and tap hole separation inconsistent with requirements of the contract and with the verifiers in this Indicator. Since the field audit, training has taken place by the FMU and the maple operator and their employees on the standards – verified with training materials and training session sign-up sheet. NCR 01/20 now CLOSED</p>
<p>Indicator 5.6.MAPLE2 Silvicultural treatments shall establish and maintain proper spacing of trees and adequate regeneration of sugar maple.</p> <p><i>Verifiers:</i> <i>Thinning is based on spacing and tree vigor.</i> <i>Retention of sugar trees may be supported by measuring sugar content of the trees (through use of a refractometer).</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Only a small area of the sugar bush was thinned prior to tapping and the lease and this was observed during the field audit. This was a very light thinning in mostly areas with no sugar maple trees.</p>
<p>Indicator 5.6.MAPLE3 Allowable tapping rates and sap harvest rates and best management practices shall be followed in the forest.</p> <p><i>Verifiers:</i> <i>Trees smaller than the minimum allowable tapping diameter are not tapped.</i> <i>Number of taps used per size class follows management prescription.</i> <i>Use of paraformaldehyde pellets or other chemicals in tap holes is prohibited.</i> <i>Taps are immediately pulled from trees at the end of the sugaring season.</i> <i>Tap holes are drilled with a slight upward angle and are not excessively deep (i.e., exceed 2.5 inches in depth).</i> <i>“Cluster tapping” is not practiced.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>During the field audit it was noted that tapping methods met the requirements in the lease agreement between FME and bush operator and that these methods are within industry norms in the region although a few trees under 10 inches were tapped (see 5.6.MAPLE1 above) and tap spacing from one tapping year to the next were not consistent with the contract standard. Only a few trees larger than 16 inches in diameter were seen during the field audit with 2 taps. Tapping depth was sampled during the audit and because the tapping guns used of governors for depth all tap holes were consistent and within the requirements of the standards set in the contract (under 2 inches).</p> <p>During the field audit, which was conducted during October 2018 and October 2019, virtually all taps observed were pulled from the previous season as</p>

<p><i>Drop lines on tubing systems are of sufficient length to preclude cluster tapping (i.e., the drop line is long enough so that the tap can reach all sides of the tree and can be placed sufficiently above or below old tap holes).</i></p>	<p>required 5 taps out of 4000 observed were not pulled which is about the standard of error expected and allowed by the contract.</p> <p>Drop lines were at least 25 inches as per the requirements of the lease contract between FMU and sugaring operator.</p>
<p>Indicator 5.6.MAPLE4 Maple sap harvest levels shall be adjusted when populations exhibit decline or weakened condition.</p> <p><i>Verifiers:</i> <i>Tapping is reduced or halted when trees exhibit decline, poor tap hole closure or symptoms of severe stress, or after a heavy thinning of the stand.</i> <i>Thinning does not take place after several defoliation events or stress events in the sugarbush (e.g., ice-damage).</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Only two seasons of tapping had occurred during the time of the field audit in October of 2019. No stand altering pests or diseases were observed in the sugar bush area.</p>
<p>PRINCIPLE #6: ENVIRONMENTAL IMPACT</p>	
<p>Intent of Principle 6: Principle 6 addresses the protection of biodiversity through a precautionary approach. The precautionary approach is particularly important in areas of steep slopes and other fragile soils, of slow growth and/or slow regeneration, in the presence of a concentration of species at risk, in the absence of a forest inventory or data on growth rates, etc. Such situations require a conservative approach to harvest levels, periods and techniques.</p>	
<p>Criterion 6.1 Assessment of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</p>	
<p>Indicator 6.1.MAPLE Prior to operations, the manager identifies sensitive elements (e.g. diversity at the stand level, wildlife, species at risk, sensitive soils, etc.) on the site in order to minimize environmental impacts through recognized practices.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The FMU managers have conducted a thorough environmental analysis of all of its ownership and including the sugarbush area and determined that are no sensitive species or elements in this area.</p>
<p>Criterion 6.3 Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p>	
<p>Indicator 6.3.MAPLE1 Sugarbush management and sap collection practices shall minimize impacts to forest composition and soil structure and fertility</p> <p><i>Verifiers:</i> <i>Management encourages retention of non-maple species in the sugarbush to promote diversity and, potentially, promote pest resistance of the stand.</i> <i>Management practices avoid heavy cleaning of the sugarbush understory.</i> <i>Grazing is prohibited in the sugarbush.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>No significant stand altering harvests have been done that seeks to eliminate non-maple species from tapped stands. All sugaring stands are accessed by existing roads within the FMU ownership. There is no grazing that occurs in these stands.</p> <p>Although not prolific due to the full stocking that these stands contained, throughout the tapped stands it was noted that sugar maple and other regeneration was present. The stands selected are natural stands very heavily stocked with sugar maple.</p>

<p><i>Access roads are kept to a minimum to avoid soil damage during spring snow melt.</i> <i>Adequate sugar maple regeneration is present.</i></p>	
<p>Indicator 6.3.MAPLE2 The Intensity of sugarbush management shall be based on understanding of species and site productivity and potential limitations.</p> <p><i>Verifiers:</i> <i>Sugaring takes place on sites well-suited for sugar maple growth;</i> <i>Tapping on severely stressed trees is halted unless those trees are scheduled for removal;</i> <i>Scheduled thinnings are delayed immediately after severe defoliation or after severe damage from a natural event.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The sites on which the sugarbush is located are well-drained soils and no tapping of diseased or stressed trees was noted during the field audit. These are good sites to be growing sugar maple and tapping the trees and that is why they were selected by the FMU and lease operator.</p>
<p>Criterion 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 protect water resources.</p>	
<p>Indicator 6.5.MAPLE1 Sugarbush operations shall comply with or exceed Best Management Practices (BMPs) for water quality protection.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>As with the rest of the FMU operation, Best Management Practices are used to minimize damage to soils and site productivity. Conformance of BMPs was noted throughout the sugaring area.</p>
<p>Indicator 6.5.MAPLE2 Sugarbush operations shall minimize damage to soils and site productivity.</p> <p><i>Verifier:</i> <i>Operation monitors road and site conditions and suspend operations to avoid rutting or erosion.</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Machinery use within the sugarbush has been minimized as the stands are accessed from the FMU existing road system. No new roads have been constructed within the bush beyond those already in existence when the first tapping was done in 2018.</p>
<p>Criterion 6.6 Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p>	
<p>Indicator 6.6.MAPLE Use of pesticides in maple sap harvest areas shall be prohibited, unless said chemicals are allowed under local, national or international organic standards or they can be justified to control exotic and invasive species that pose a significant threat to the long term health and viability of the sugarbush and forest ecosystem.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>There has been no pesticide use in maple sap harvest areas on the FMU.</p>
<p>Criterion 6.7 Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</p>	
<p>Indicator 6.7.MAPLE Unused sap collection materials and any waste generated from sugaring operations is removed from the forest and disposed of appropriately</p> <p><i>Verifiers:</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>There was no unused sap collection materials (tubing or other waste) seen in the sugarbush or at the sugar house during the field audit.</p>

<p><i>Unused tubing and/or buckets are removed from the sugarbush.</i></p> <p><i>Waste or rubbish generated from gathering or processing activities are removed from the forest and disposed of in an environmentally appropriate manner.</i></p>	
PRINCIPLE #7: MANAGEMENT PLAN	
<p>Criterion 7.1 The management plan and supporting documents shall provide:</p> <p>a) Management objectives.</p> <p>b) Description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</p> <p>c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.</p> <p>d) Rationale for rate of annual harvest and species selection.</p> <p>e) Provisions for monitoring of forest growth and dynamics.</p> <p>f) Environmental safeguards based on environmental assessments.</p> <p>g) Plans for the identification and protection of rare, threatened and endangered species.</p> <p>h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</p> <p>i) Description and justification of harvesting techniques and equipment to be used.</p>	
<p>Indicator 7.1.MAPLE1</p> <p>The forest management plan shall specifically address and incorporate sugarbush management objectives and silvicultural prescriptions.</p> <p><i>Verifiers:</i></p> <p><i>The sugarbush is incorporated into the management plan and on management maps and has clear management objectives.</i></p> <p><i>Maps delineate the sugarbush area and indicate sugaring access roads and the sugaring shed.</i></p> <p><i>Silvicultural prescriptions for the sugarbush, whether under even-aged or uneven-aged management, are documented and followed.</i></p> <p><i>Silvicultural prescriptions, tree marking and harvesting operations do not favor the removal of non-maple species when is the dominant species</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>“Sugarbush Management Plan Upper St. John River Forest - The Nature Conservancy Maine, 2019-29” was developed specifically for the sugarbush area and is an addendum to the lease contract between the FMU and the maple operator Gold Sugar Bush, Inc. All the requirements of this indicator are met in the Plan.</p>
<p>Indicator 7.1MAPLE2</p> <p>The Sugarbush Management sections of the plan shall be technically sound and sufficiently detailed, given the size, complexity and intensity of the forest operation. The plan shall include a description of and justification for the intensity of maple sap harvesting, the implemented harvesting technique and the equipment used.</p> <p><i>Verifiers:</i></p> <p><i>The sugar bush management plan addresses silvicultural practices for non-maple species</i></p> <p><i>The tapping rule is documented and information on the number of allowable taps per size class, the depth of taps and the</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>“Sugarbush Management Plan Upper St. John River Forest - The Nature Conservancy Maine, 2019-29” was developed specifically for the sugarbush area and is an addendum to the lease contract between the FMU and the maple operator Gold Sugar Bush, Inc. All the requirements of this indicator are met in the Plan.</p>

<p><i>placement of taps on the tapping band is specified in the management plan.</i></p> <p><i>Rationale for the equipment used is justified.</i></p> <p><i>If prescribed tapping rates vary from well-established norms, compelling evidence justifies the deviation.</i></p> <p><i>Tapping rates are justified by prompt tap hole closure, published tapping guidelines and relevant site-specific data and observation.</i></p> <p><i>Use of “health spouts” or “narrow spouts” on small diameter trees (<10 inches DBH) is conservative until research shows such usage is ecologically and economically viable.</i></p>	
<p>Criterion 7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.</p>	
<p>Indicator 7.2.MAPLE</p> <p>Sugarbush management and harvesting practices shall be periodically adjusted to incorporate new scientific or technical information.</p> <p><i>Verifier:</i></p> <p><i>Forest manager follows research and development related to maple sap and syrup production</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The sugarbush operation is brand new to this FMU (beginning in 2018) and has not yet had the opportunity to adjust practices due to the short tenure of operation. The sugarbush lessee is connected to the latest research through the International Maple Syrup Institute – the international organization (U.S. and Canada) that coordinates maple syrup research and outreach of findings and its contractor – CDL – one of the leading maple operation companies in Canada and the U.S.</p>
<p>Criterion 7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan.</p>	
<p>Indicator 7.3.MAPLE</p> <p>Workers receive adequate training and supervision to ensure proper tapping and processing techniques.</p> <p><i>Verifiers:</i></p> <p><i>Cluster tapping is not observed in the field.</i></p> <p><i>Tap holes are properly drilled (at a proper depth, with a new sharp drill bit, showing infrequent splitting of the bark from driving taps too deeply or into frozen tissue).</i></p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Field audit revealed tapping techniques consistent with the tapping standard in the lessee contract except for minor deviation (see 5.6. and NCR that is closed) which included no “cluster tapping” and tap holes drilled to proper depth using sharp drill bits. New training occurred since the field audit in October 2019 and prior to completion of this draft report. Evidence of the training was provided to the auditor.</p>
<p>PRINCIPLE #8: MONITORING AND ASSESSMENT</p>	
<p>Criterion 8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations as well as the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</p>	
<p>Indicator 8.1.MAPLE</p> <p>Sugarbush monitoring shall be incorporated into the overall monitoring plan for the forest management operation and provide data on forest changes upon which management prescriptions can be updated.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>The FMU, through its staff and its consulting forestry management contractor, has been monitoring the installation of the new sugarbush operation on a regular basis. The on-site forester with the FMU has knowledge of sugaring and a forestry contractor forester who manages this area for the FMU owner is bi-lingual since the lessee is a French speaker only. During the field audit the FMU contract forester was very knowledgeable about the operation and progress meeting the requirements of the lessee contract.</p>
<p>Criterion 8.2 Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:</p>	

<p>a) Yield of all forest products harvested. b) Growth rates, regeneration and condition of the forest. c) Composition and observed changes in the flora and fauna. d) Environmental and social impacts of harvesting and other operations. e) Costs, productivity, and efficiency of forest management.</p>	
<p>Indicator 8.2.MAPLE The sugarbush monitoring plan is technically sound and identifies/describes monitoring of the following: changes in the maple component of forest composition (size class and distribution) maple growth rates and regeneration; changes in maple health (decline, die-back or poor tap hole closure rates); presence of pests; and, harvesting levels including the number of taps used, volume of sap collected and volume and grades of syrup produced.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The regular monitoring being conducted by both on-site FMU employee forester and the contract forester company forester is covering the required monitoring areas in this indicator. It is too early in the sugarbush lease (one season with partial tapping and a second completed in 2019) to determine changes in maple component or maple health. Information and data was provided the auditor that documented the number of taps used and sap collected during the 2018 and 2019 seasons.</p>
<p>Criterion 8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</p>	
<p>Indicator 8.3.MAPLE1 The volume and source of sap collected and the volume and grades of syrup produced shall be recorded for future tracing.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> The volume and source of sap collected from 2018 and 2019 seasons and syrup production – the first and second years of the maple lease operation - was documented and provided to the auditor.</p>
<p>Indicator 8.3.MAPLE2 Invoices of syrup or sap sales are documented, include required information (certification code, FSC product group) and are stored for inspection.</p>	<p>Conformance with Indicator: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> In 2019 the sap collected and processed at the new sugar house was not claimed as FSC certified. Some of the 2020 crop may be processed and claimed as FSC certified and that will be documented by the FMU. This should be checked by the auditor in 2020 after the 2020 season.</p>
<p>Indicator 8.3.MAPLE3 For operations with multiple (certified and non-certified) sources of sap, production and labelling of product will follow FSC requirements for mixed products.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> The Gold Sugar Bush lease operation does not use or buy sap from sugar bushes outside of the FSC leased area.</p>
<p>Indicator 8.3.MAPLE4 100% FSC Certified syrup and sap is kept separate from non-certified product and clearly distinguished through marks, labels or other means.</p>	<p>Conformance with Indicator: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> The Gold Sugar Bush lease operation does not use or buy sap from sugar bushes outside of the FSC leased area.</p>

Annex III redacted for confidential information.

Annex IV redacted for confidential information.

Annex V redacted for confidential information.

Annex V-a: Certified Pool Participation List

1. Total # members and FMUs in the certified pool: 23 members, FMUs:25
2. Total area in Current Pool (ha.): 251,357

CERTIFIED FMU TABLE (list all FMU included in certificate scope)

Name of Member/ Contact Details	FMU (if > 1/ member)	Management Tenure	FMU Location (e.g. town, county)	FMU Latitude/ Longitude	FMU area (ha)	Main Products
Upper St. John River (ME)		Privately Managed	Northwest Maine	N 47.48 W 69.78	65,108	Pulp, logs
Clinch Valley Conservation Forestry Program (VA)		Privately Managed	Western Virginia	N 36.90 W 81.98	8,863	Pulp, logs
Sand Lake-Seven Beavers and Manitou (MN)		Privately Managed	Northeast Minnesota	N 47.28 W 91.17	3,559	Pulp, logs
Working Woodlands Network (PA)		Privately Managed	North Central Pennsylvania	N 41.18 W 77.34	1,485	Pulp, logs
Bethlehem Authority (PA)		Publicly Managed	East Central Pennsylvania	N 40.76 W 75.31	9,050	Pulp, logs
Lock Haven City Authority (PA)		Publicly Managed	North Central Pennsylvania	N 41.06 W 77.21	1,985	Pulp, logs
Two-hearted River Reserve (MI)		Privately Managed	Upper Peninsula of Michigan	N 46.35 W 85.36	9,980	Pulp, logs
Nassawango Creek Preserve (MD)		Privately Managed	Eastern Shore of MD	N 38.17 W 75.27	3,807	Pulp, logs
Appalachian Mt. Club (ME)		Privately Managed	Central Maine	N 45.54 W 69.30	29,903	Pulp, logs
7 Lakes (MI)		Privately Managed	Upper Peninsula of Michigan	N 46.32 W 86.03	956	Pulp, logs
Hiawatha Hunt Club (PA)		Privately Managed	East Central Pennsylvania	N 41.07 W 75.10	528	Pulp, logs

Capital Region Water (PA)		Publicly Managed	Southeastern PA	N 40.47 W 76.72	3,076	Pulp, logs
Hawk Mtn Sanctuary (PA)		Privately Managed	Southeastern PA	N 40.63 W 76.72	1,012	Pulp, logs
Chestnut Mtn. (TN)		Privately Managed	Central TN	N 35.86 W 85.32	2,335	Pulp, logs
Shafer Tuuk (TN)		Privately Managed	Central TN	N 35.98 W 85.34	1,264	Pulp, logs
Wilderness Lakes Preseve (MI)		Privately Managed	Upper Peninsula of Michigan	N 46.77 W 88.49	2,255	Pulp, logs
Forest Stewards Guild (MI)		Privately Managed	Upper Peninsula of Michigan	N 47.12 W 88.56	166	Pulp, logs
Albany Water Board (NY)		Publicly Managed	Eastern NY	N 42.47 W 73.79	1,910	Pulp, logs
Edge of Appalachia (OH)		Privately Managed	Southern OH	N 38.47 W 83.32	7,739	Pulp, logs
CF Ataya (TN & KY)		Privately Managed	E TN and KY	N 36.64 W 83.79	40,406	Pulp, logs
CF Highlands (VA)		Privately Managed	Southwestern VA	N 36.64 W 83.79	51,659	Pulp, logs
Sewanee (TN)		Privately Managed	South Central TN	N 35.98 W 85.34	5,275	Pulp, logs
Gold Sugar Bush (ME)		Maple Lease	Maine	N 47.48 W 69.78	No land	Maple products
Total area in certified pool.					252,321	