

Boundary Waters Forest Management Unit

2025 Independent Forest Audit

Management Unit Action Plan

Boundary Waters Forest Independent Forest Audit

Action Plan Submission Signature Page

Prepared By:

Original Signed by: Ren Peterson, R.P.F.
Regional Planning Forester, NWR
MNR Northwest Region
Date: February 6, 2026

Original Signed by: Renee Perry R.P.F.
Management Forester
MNR Dryden Fort Frances Atikokan District
Date: February 6, 2026

Original Signed by: Sangeetha Subhash,
MNR Dryden Fort Frances Atikokan District
Date: February 6, 2026

Original Signed by: Christa Campbell, R.P.F.
Forestry Coordinator Ontario Woodlands
Domtar
Date: February 4, 2026

Reviewed By:

Original Signed by: Ian Armstrong, R.P.F.
General Manager
Boundary Waters Forest Management Corp
Date: February 4, 2026

Boundary Waters Forest Independent Forest Audit

Action Plan Submission Signature Page

Submitted By:

Original Signed by: Michelle Glena
District Manager
MNR Dryden Fort Frances Atikokan District
Date: February 13, 2026

Approved By:

Original Signed by: Michael Gluck
Regional Director
MNR Northwest Region
Date: February 20, 2026

Cette publication hautement spécialisée n'est disponible qu'en anglais conformément au Règlement 671/92, selon lequel il n'est pas obligatoire de la traduire en vertu de la Loi sur les services en français. Pour obtenir des renseignements en français, veuillez communiquer avec le ministère des Richesses naturelles et des Forêts au NRISC@ontario.ca

Introduction

The Independent Forest Audit for the Boundary Waters Forest covered an eight-year period of April 1, 2017 – March 31, 2025. The auditees include the licence holder Boundary Waters Forester Management Corp, Atikokan-Dryden-Fort Frances District MNR, Northwest Region MNR, and Corporate MNR.

The audit scope includes:

- Three years of Sapawe Forest Management Plan (FMP) 2010-2020 Phase II (2017-2019) implementation
- One year of Crossroute FMP 2007-2017 Phase II (2017) implementation
- Development of Crossroute Contingency Plan (CP) (2017-2020)
- Three years of Crossroute CP (2017-2020) implementation
- Development of Boundary Waters FMP 2020-2030
- Five years implementation of Boundary Waters FMP 2020-2030 (2020-2025)

Caliber Forestry Consulting audit team conducted a field audit in June 2025 and have identified nine findings to address instances of non-conformance to a regulation and/or policy, or an identified lack of effectiveness in forest management activities.

Overall, the audit team concludes that the management of the Boundary Waters Forest was generally in compliance with the legislation, regulations, and policies that were in effect during the period covered by the audit, and the Sustainable Forest Licence was managed in compliance with the terms and conditions of the Crown Forest Sustainability Act and the Sustainable Forest Licence held by Boundary Waters Forest Management Corp. The forest is being managed consistent with the principles of sustainable forest management, as assessed through the Independent Forest Audit Process and Protocol.

On November 18th, 2025, the Director of the Regional Operations Division accepted the final audit report from Caliber. This action plan is being prepared in accordance with IFAPP to address the findings of the Independent Forest Audit for the Boundary Waters Forest.

Findings

Finding #1:

There is no documented evidence that First Nation and Métis communities on or adjacent to the Boundary Waters Forest have been offered an opportunity for representation on the Resource Management Advisory Committee or the Natural Resources Advisory Committee.

Action Required:

1. MNR District will send each First Nation and Métis community within or adjacent to the Boundary Waters Forest and as identified in the 2020-2030 FMP, an invitation for a representative of the respective community to participate on the Local Citizens Committees (LCC) (Resource Management Advisory Committee (Atikokan) & the Natural Resources Advisory Committee (Fort Frances)).
2. MNR District will send each First Nation and Métis community within or adjacent to the Boundary Waters Forest and as identified in the 2020-2030 FMP, a follow up email to the initial invitation letter to confirm if a representative from the community is interested in participating on the LCC (Resource Management Advisory Committee (Atikokan) & the Natural Resources Advisory Committee (Fort Frances)).

Organization and Position Responsible:

1. MNR-District Resource Liaison Specialist & District Manager.
2. MNR-District Resource Liaison Specialist & District Manager.

Deadline Date:

1. January 30th, 2027.
2. March 30th, 2027.

Method of Tracking Progress:

1. Invitation and correspondences will be documented for each community and filed at the Dryden Fort Frances Atikokan MNR office.
2. Invitation and correspondences will be documented for each community and filed at the Dryden Fort Frances Atikokan MNR office.
3. LCC minutes.

Finding #2:

Area of Concern prescriptions developed by the Planning Team do not consistently consider alternative prescriptions.

Action Required:

1. The AOCs in the 2020 BWF FMP were developed under the 2017 FMPM and the majority have been developed through previous FMP planning exercises. As per the 2017 FMPM Part A, Section 1.3.5.1 (page A-56) alternative analysis was not needed for the AOCs from a previous planning exercise that were supported during the Boundary Waters FMP public review. The MNR will update the FMP AOC supplementary documentation to reflect that no alternative prescriptions are required and correct any errors, where applicable.
2. The BWF FMP Planning Team will continue to follow the Forest Management Planning Manual (FMPM) to develop proposed operational prescription or condition on operations and consider alternative prescriptions where applicable.

Organization and Position Responsible:

1. Regional Planning Forester, District Biologist, District Management Forester, BWPMC.
2. FMP planning team.

Deadline Date:

1. October 31 2026.
2. FMP plan renewal schedule for the 2030-2040 BWF FMP.

Method of Tracking Progress:

1. An administrative amendment to the 2020-2030 BWF FMP will be developed by the MNR and BWPMC to update the area of concern (AOC) supplemental documentation.
2. 2030-2040 Boundary Waters Forest FMP plan renewal.

Finding #3:

The number of amendments being submitted and the time for review and approval could be improved.

Action Required:

1. MNR District will ensure that Forest Management Planning Manual timelines for review and approval of Amendments are met by reviewing the processing timelines with Supervisors, to determine if additional staff are needed to complete the Amendment process.

2. MNR District will communicate circumstances that may result in Amendment processing delays to the SFL, to ensure timelines for approval align with operations where possible.
3. MNR District will review the current “Pre-Approved Administrative Amendments Classification List” with the Local Citizens Committees (LCC) to determine if additional Amendments can be added to the list to expedite the review process. Also, MNR District will discuss the need to develop a sub committee (can develop a Terms of Reference (ToR)) for categorization on amendments in absence of regular LCC meetings.
4. It was found that there have been several ORB amendments to the 2020-2030 BWF FMP that could have been addressed during plan development. To reduce the number of ORB amendments the FMP planning team during the planning of the 2030-2040 FMP will ensure that ORB areas include all potential access to harvest areas to ensure operational flexibility for Licensees.
5. BWPMC will conduct a planning exercise to review the remaining harvest areas within the 2020-2030 FMP to determine if ORB areas include all potential access and provide enough operational flexibility for Licensees. As a result of the planning exercise, BWPMC may submit an amendment.

Organization and Position Responsible:

1. MNR District- Management Forester and District Supervisor.
2. MNR District-Management Forester.
3. MNR District-Management Forester, LCC.
4. FMP Planning Team.
5. BWPMC – General Manager .

Deadline Date:

1. January 2026, On-going.
2. January 2026, On-going.
3. May 2026, On-going.
4. 2030-2040 BWF FMP plan development.
5. October 2026, On-going.

Method of Tracking Progress:

1. NRIP.
2. Emails and correspondence will be documented and filed at the Dryden Fort Frances Atikokan MNR office.
3. LCC Minutes and ToR.
4. Natural Resources Information Portal -2030-2040 BWF FMP.

5. Natural Resources Information Portal – Potential Amendment submission.

Finding #4:

The Ministry of Natural Resources did not follow the direction outlined in the Greytrout Crown Land Use Policy Atlas or the Boundary Waters Forest 2020–2030 Forest Management Plan by posting signage in 2024 that permanently closed Rogers, Grit South, and Duke South Roads to public use.

Action Required:

1. MNR District and the Boundary Waters Forest Management Corporation (BWPMC) will work collaboratively to submit an Amendment that includes an updated Supplementary Documentation (Supp Docs) and FMP-18 table for the Rogers, Grit South and Duke South Roads. The Amendment will include the addition of the current PLA sign wording to the FMP-18 table and Supp Docs, and removal of the wording that references the English River Forest access restriction and location.
2. MNR District and the BWPMC will ensure through the production and review of the 2026 Annual Work Schedule (AWS) that the new Forest Information Manual Technical Specification to identify all planned access restrictions located on new Operational, Branch and Primary Roads are included on all AWS maps.

Organization and Position Responsible:

1. MNR District- Management Forester and BWPMC- General Manager.
2. MNR District-Management Forester and BWPMC – General Manager.

Deadline Date:

1. February 2026, On-going.
2. January 2026, On-going.

Method of Tracking Progress:

1. Natural Resources Information Portal -Amendment submission.
2. Natural Resources Information Portal – 2026 Annual Work Schedule.
3. Annual Reports.

Finding #5:

Forest management plan operational standards for forestry aggregate pits were not consistently met.

Action Required:

1. Notification:
 - a. Memo sent to all Licensees regarding issue and corrective action.
 - b. Compliance staff made aware of issue and steps for correction.

- c. Licensees made aware of consequences for failure to follow Operational Standards.
- 2. Training: Training will continue to be provided to all Forest Resource Licensees (FRLs) through the SFL Company's Environmental Management System (EMS).
 - d. SFL will ensure that Aggregate Pit Standards are available on the EMS website and share the information with all FRLs.
 - e. SFL will ensure that Forest Aggregate Pit operational standards and their requirements are reviewed as part of their annual EMS reviews with FRLs prior to start up of harvest and access operations.
- 3. Compliance: The SFL will continue to monitor and report on aggregate pit standards for FRL operations on the BWF through their EMS system and as per the AWS annual compliance plan.
 - f. Aggregate Pits will remain a focus in the SFL's AWS annual compliance and monitoring program.
 - g. EMS compliance is a requirement of all Overlapping Agreements. The SFL will request that the MNR delay issuing harvest approvals when the FRL has known outstanding compliance issues or unaddressed corrective actions related to aggregate pits. Harvest approvals will only be issued when the SFL is satisfied that issues have been fully addressed.

Organization and Position Responsible:

- 1. Boundary Waters Forest Management Corp – General Manager for a, b and c.
- 2. Boundary Waters Forest Management Corp – General Manager for d, e.
- 3. Boundary Waters Forest Management Corp – General Manager SFL, MNR and Forest compliance inspectors for f and Boundary Waters Forest Management Corp – General Manager SFL for g.

Deadline Date:

- 1. Action completed email sent to operations staff on October 28 2025.
- 2. January 19th 2026 and On-going.
- 3. January 19th 2026 and On-going.

Method of Tracking Progress:

- 1. Record of emails sent to FRLs and Operations Staff and minutes from BWPMC operation's committee meetings.
- 2. BWPMC EMS Pre start check list, BWPMC EMS website.
- 3. AWS Annual Compliance plan, Compliance Inspections and reports, Annual Reports.

Finding #6:

The slash management strategy identified in the forest management plan has not been consistently applied.

Action Required:

1. Notifications:
 - a. Memo sent to all Licensees regarding issue and corrective action.
 - b. Compliance staff made aware of issue and steps for correction.
 - c. Licensees made aware of consequences for failure to follow FMP Operational Standards for debris management.
2. Training: Training will continue to be provided to all Forest Resource Licensees (FRLs) through the SFL Company's Environmental Management System (EMS).
 - d. SFL will ensure that debris management standards are available on the EMS website and share the information with all FRLs.
 - e. SFL will ensure that debris management standards and their requirements are reviewed as part of their annual EMS reviews with FRLs prior to start up of harvest and access operations.
3. Compliance: The SFL will continue to monitor and report on the effectiveness of debris management for FRL operations on the BWF through their EMS system and Operations Report.
 - f. The SFL will ensure that debris management remains a focus in the SFL's EMS monitoring and operations reporting programs and ensure that harvest areas identified with inadequate debris management are managed as per FMP requirements.
 - g. EMS compliance is a requirement of all Overlapping Agreements. The SFL will request that the MNR delay issuing harvest approvals when the FRL has known outstanding issues or unaddressed corrective actions related to debris management. Harvest approvals will only be issued when the SFL is satisfied that issues have been fully addressed.

Organization and Position Responsible:

1. Boundary Waters Forest Management Corp – General Manager for a, b and c.
2. Boundary Waters Forest Management Corp – General Manager for f.
3. Boundary Waters Forest Management Corp – General Manager for g.

Deadline Date:

1. Action completed email sent to operations staff on October 28 2025.
2. January 19th 2026 and On-going.
3. January 19th 2026 and On-going.

Method of Tracking Progress:

1. Record of emails sent to FRLs and Operations Staff and minutes from BWPMC operation's committee meetings.
2. BWPMC EMS Pre start check list, BWPMC EMS website.
3. BWPMC Operations Report, Silvicultural Assessment, Annual Reports.

Finding #7:

Ministry of Natural Resources failed to meet the intent of the Forest Compliance Handbook Inspection, Monitoring and Reporting Procedures in relation to Operational Issue Verification as well as compliance monitoring targets identified in the FMP compliance strategy.

Action Required:

1. MNR District will maintain an Annual Compliance Operations Plan (ACOP) to meet objectives within the Compliance strategy.
2. MNR District Supervisors will ensure staff receive compliance training to enable them to obtain the Forest Compliance Inspector Certification.
3. MNR District Compliance Committee (DCC) will hold regular meetings to discuss operational issues, compliance remedies, verification timelines and compliance coordination.
4. MNR District will increase the number of compliance inspections conducted on the ground.

Organization and Position Responsible:

1. MNR – District Supervisor, Integrated Resources Management Technical Specialist.
2. MNR- District Supervisors.
3. MNR Compliance Inspectors.
4. MNR Compliance Inspectors.

Deadline Date:

1. September 30 2026, On-going.
2. January 2026, On-going.
3. September 30 2026, On-going.
4. January 2026, On-going.

Method of Tracking Progress:

1. District Compliance Strategy/Annual Compliance Operations Plan.
2. Forest Compliance Inspector Certification.
3. DCC Meeting minutes.
4. Compliance Tracking Program (currently FOIP).

Finding #8:

A significant area that was depleted in 2007 and 2008 has not been assessed.

Action Required:

1. BWFMC and District MNR will address the 2007 and 2008 backlog areas as part of the planned free-to-grow program. Assessing may include: free-to-grow assessments, use of existing imagery, new Lidar information, next forest resource inventory.

Organization and Position Responsible:

1. Boundary Waters Forest Management Corp. -General Manger, District MNR Management Forester.

Deadline Date:

1. The 2026 AWS and future AWS will schedule the FTG backlog areas until the backlog is completed by March 31 2030.

Method of Tracking Progress:

1. The Annual Report for areas assessed as free-to-grow and the progress towards completion will be documented as per FIM AR technical specifications.

Finding #9:

With additional cooperation between Shareholders, it would have been possible to harvest more volume from the forest.

Action Required:

1. Boundary Waters Forest Management Corp's Board of Directors and Operations Committee developed a process to make available wood to harvest shareholders on the forest when shortfalls occur. This process is consistent with the BWFMC Shareholders Agreement.

Organization and Position Responsible:

1. Boundary Waters Forest Management Corp – General Manager.

Deadline Date:

1. December 10th 2025 and On-going.

Method of Tracking Progress:

1. Monthly Board of Directors Progress Reports and quarterly Board meetings along with monthly Operations Committee meetings.
2. Harvest Progress through Annual Report.