The Gorman Group
Environmental Management System

Part 2 of 4: Sustainable Forest Management Program

SFI 2022 Forest Management Standard

Sustainable Forestry Initiative® (SFI®)

DOWNIE TIMBER LTD.

CANOE brand® Canoe Forest Products

GORMAN The Finest Boards®

The Documents That Comprise the EMS Program:

Part 1: Environmental Policy

Part 2: Sustainable Forest Management Program
(SFI 2022 Forest Management Standard)

Part 3: Fiber Sourcing Program
(SFI 2022 Fiber Sourcing Standard)

Part 4: Environmental Management System Manual
(Including the PEFC Chain of Custody requirements)

TABLE OF CONTENTS

The Gorman Group EMS
Sustainable Forest Management Program

INTRODUCTION: The Gorman Group

The Gorman Group of Companies is fully committed to responsible and sustainable forest management of the lands where our operations are conducted. The Group consists of 5 manufacturing facilities located in the southern interior of British Columbia, Canada.

Gorman Bros. Lumber Ltd. (GBL) (www.gormanbros.com) was founded by brothers Ross and John Gorman in 1951 and has operated continuously for over 70 years. The company has thrived on a philosophy of working closely with their communities to create stable, long-term, well-paying jobs, and demonstrating a high level of regard for maintaining "social license" when conducting our forest management activities.

The West Kelowna location has a current workforce of about 450 employees and contractors, and consumes over 550,000m^3 annually of spruce and pine logs. In conjunction with our remanufacturing facility in Oroville, Washington, we produce over 160 million board feet annually of high quality, appearance grade 1" boards for the U.S., Canadian, and overseas markets. By-products include chips and sawdust/shavings that are sold locally to pulp/paper manufacturers, and more recently into the emerging bio-energy market.

The Lumby Pole Division produces approximately 14,500 cedar utility poles augmented with a small quantity of Douglas-fir pilings that are sold almost exclusively into Canadian markets. The vast majority of these poles are sourced from Crown tenures, or from large industrial private land holdings on the BC coast.

In 2011, the Gorman family acquired full ownership and control of Downie Timber Ltd. (DTL) in Revelstoke, British Columbia – www.downietimber.com. The Downie mill produces a mix of high quality cedar and Douglas-fir dimension products that are sold into the US, European and Japanese markets, as well as producing 1" spruce boards for the West Kelowna mill. Over 400,000m^3 of logs are consumed annually at Downie, producing roughly 140 million board feet of finished products.

In the fall of 2012, Canoe Forest Products (CFP) - www.canoefp.com (formerly Federated Cooperatives Ltd.) located in Canoe, British Columbia was purchased. The Canoe facility produces high-grade Douglas-fir plywood that is sold into Canadian markets, consuming approximately 230,000m^3 annually.

The Downie and Canoe facilities employ about 290 and 195 people, respectively, and like West Kelowna, are the largest employers in their communities.

Commitment to the SFI Standards

The Gorman Group conducts responsible and sustainable forest management through:

- our **commitment** to the *Sustainable Forestry Initiative® (SFI®)* Principles, and
- the Objectives contained in both the *SFI Forest Stand Management* and the *SFI Fiber Sourcing* Standards.

This Sustainable Forest Management Plan (SFMP) describes how we will:

- adhere to the legal and regulatory framework governing forest management in BC,
- meet the performance measures contained within the Objectives to uphold the 13 Principles of **Sustainable Forestry Initiative Program,** and
- implement and monitor our operational plans through our EMS framework.

SFI 2022 Forest Management Standard Principles

1. Sustainable Forestry	8. Research
2. Forest Productivity and Health	9. Training and Education
3. Protection of Water Resources	10. Community Involvement and Social Responsibility, and Respect for Indigenous Rights
4. Protection of Biological Diversity	11. Transparency
5. Aesthetics and Recreation	12. Continual Improvement
6. Protection of Special Sites	13. Responsible Fiber Sourcing
7. Legal Compliance	

These Principles address the array of economically, environmentally and socially sound practices in the conservation of forests — including appropriate protection, growth, harvest and use of those forests — using the best scientific information available.

The Principles are supported by the following Objectives which are the fundamental goals of sustainable forest management:

SFI 2022 Forest Stand Management Standard Objectives

The *SFI Forest Stand Management Standard* pertains to organizations that own or have management authority for forest lands. Objectives contained in the SFI Forest Stand Management Standard are:

Objective 1 – Forest Management Planning
Objective 2 – Forest Health and Productivity
Objective 3 – Protection and Maintenance of Water Resources
Objective 4 – Conservation of Biological Diversity
Objective 5 – Management of Visual Quality and Recreational Benefits
Objective 6 – Protection of Special Sites
Objective 7 – Efficient Use of Fiber Resources
Objective 8 – Recognize and Respect Indigenous Peoples' Rights
Objective 9 – Climate Smart Forestry
Objective 10 – Fire Resilience and Awareness

Objective 11 – Legal and Regulatory Compliance

Objective 12 – Forestry Research, Science and Technology

Objective 13 – Training and Education

Objective 14 – Community Involvement and Landowner Outreach

Objective 15 – Public Land Management Responsibilities

Objective 16 – Communications and Public Reporting

Objective 17 – Management Review and Continual Improvement

Objectives 1-10 provide measures for evaluating conformance with the SFI 2022 Forest Management Standard on forest lands the Gorman Group owns or controls through long-term leases. These Objectives are addressed in forest management plans and internal processes of various sorts.

Objectives 11-17 provide measures for evaluating conformance with the SFI Standards around research, training, legal compliance, public and landowner involvement, management review, and continual improvement. These Objectives are addressed in a variety of Programs, Development Plan reviews, Operating Procedures, and Corporate directives.

The Objectives provide measures for evaluating conformance with the Standard for land management, legal compliance, logger and landowner training, outreach and extension, Internal management reviews, and continual improvement. These Objectives are met through documents, risk assessments, and purchase agreements in the Gorman Group Log Purchase Program.

To support the implementation of the SFI Program, Standards, Principles and Objectives, a single Environmental Management System (EMS) serves as the principal instrument to ensure that the SFMP is implemented, monitored and measured across all Divisions.

Scope of the SFMP

The Gorman Group operates on 6 forest tenures – 4 in the Okanagan Timber Supply Area Forest Licences (FLs) A18670, A18671, Tree Farm Licence 33 (TFL 33) and Timber Licence 635 (T0635), FL A31102 in the Revelstoke TSA, and FLA17644 in the Golden TSA. All operations occur under Forest Stewardship Plans that are 'division specific' at this time. Each FSP is a map based, landscape-level view of potential development activities that are intended to take place on the area described in the plan. Among other things, the purpose of the FSP is to:

- List applicable Objectives Set by Government (OSBG).
- Describe the measurable and/or verifiable results and/or strategies that would meet the OSBG.
- Prescribe measures specific to forest range.

- Provide an opportunity for review and an opportunity for input.
- Support government's consultation duty with First Nations.

Objectives were derived from the Okanagan-Shuswap Land and Resources Plan (OSLRMP), the Revelstoke Minister's Advisory Committee (RMAC) and the Kootenay Boundary Higher Level Plan (KBHLP) which were signed off by one or more of the Gorman Group companies. All 3 processes (the OSLRMP, RMAC and the KBHLP) brought a wide range of interest groups together to identify resource values and management objectives for the respective Timber Supply Areas.

Operations are carried out within several Biogeoclimatic Zones including the Interior Cedar Hemlock (ICH), Interior Douglas-fir (IDF), Montane Spruce (MS) and Engelmann Subalpine Fir (ESSF). Operations range in elevation from approximately 350 metres to over 2200 metres. Species harvested include Douglas-fir, Spruce, Western Red Cedar, Western Hemlock, Balsam, Larch, and Lodgepole Pine. Harvesting is carried out by contractors with conventional ground skidding systems using feller bunchers and skidders and also by using overhead cable systems and some helicopter logging.

The Sustainable Forestry Initiative Program provides parameters (Objectives, Performance Measures, and Indicators) that are described within the SFI 2022 Standard. The parameters are used to measure success in determining achievement in meeting the SFI Standard. This SFM Plan addresses those parameters contained within the SFI Standard and identifies the programs, plans and activities that support them.

The SFI Program is overseen by the Sustainable Forestry Board (SFB), which is an independent board responsible for maintaining and enhancing the SFI Standard certification procedures. The SFB contains members from conservation and environmental organizations, regulatory agencies, professional forestry organizations, logging professionals and landowners. For more information on the Sustainable Forestry Initiative, visit the SFI website at: http://www.forests.org .

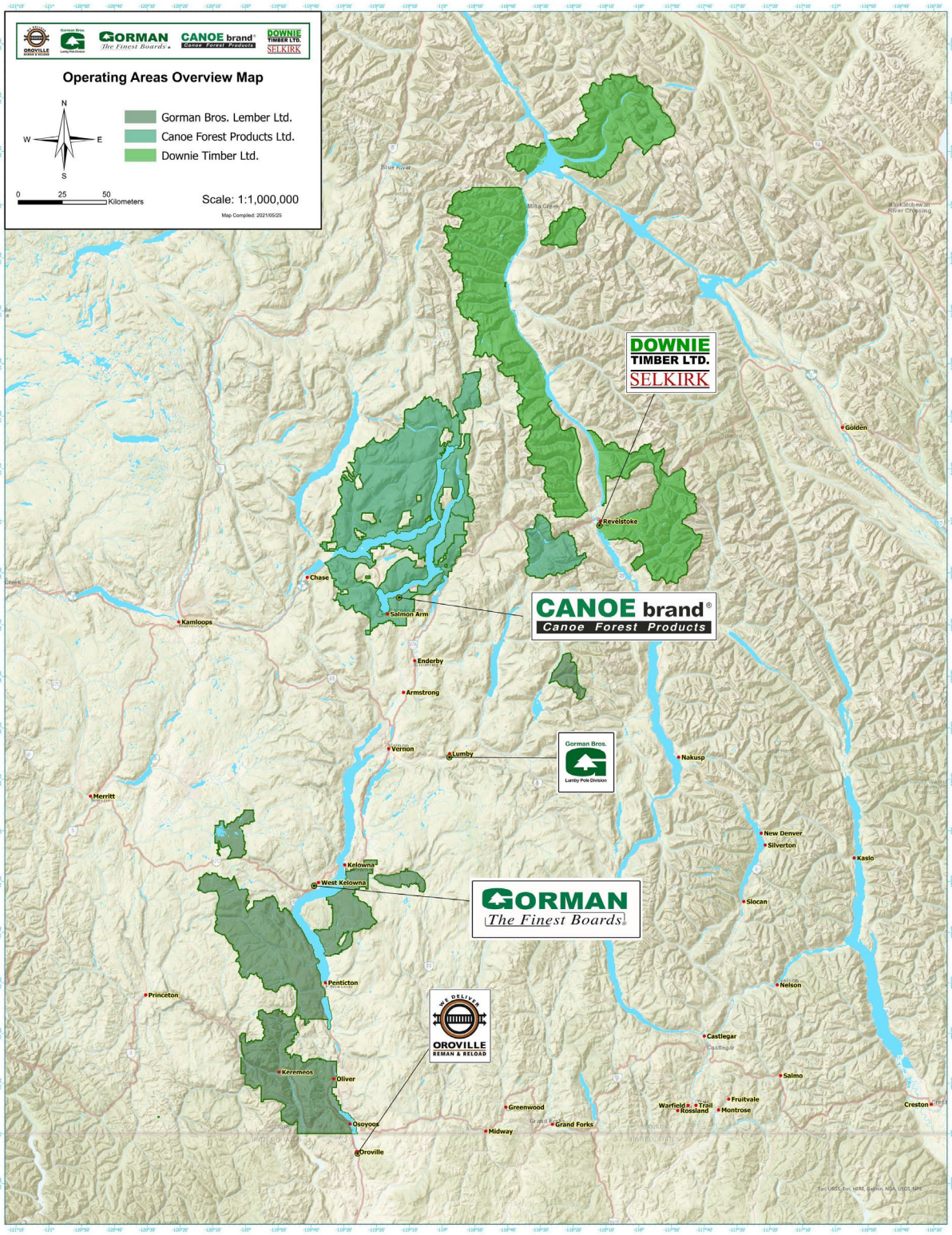
The SFMP covers operations on the company-owned, crown-issued forest tenures:

- Quota volume from the associated land base of Forest License A31102 in the Revelstoke Timber Supply Area (TSA) and Forest License A17644 in the Golden Forest TSA directly managed by the Woodlands Department of Downie Timber Ltd.
- Quota volume from the associated land base of Forest License A18670 in the Okanagan Timber Supply Area (TSA), TFL 33 and TO635 managed by the Woodlands Department of Canoe Forest Products Ltd.
- Quota volume from the associated land base of Forest License A18671 in the Okanagan Timber Supply Area (TSA) managed by the Woodlands Department of Gorman Bros. Lumber Ltd.

The SFMP is limited to the forest management activities completed on the crown issued tenures performed by Woodlands Department employees, consultants and contractors, at each Company.

The range of activities includes forest development and planning including lay-out, assessments and surveys, road construction, maintenance and deactivation, harvesting and post harvest activities including site preparation, in-block deactivation, planting and brushing.

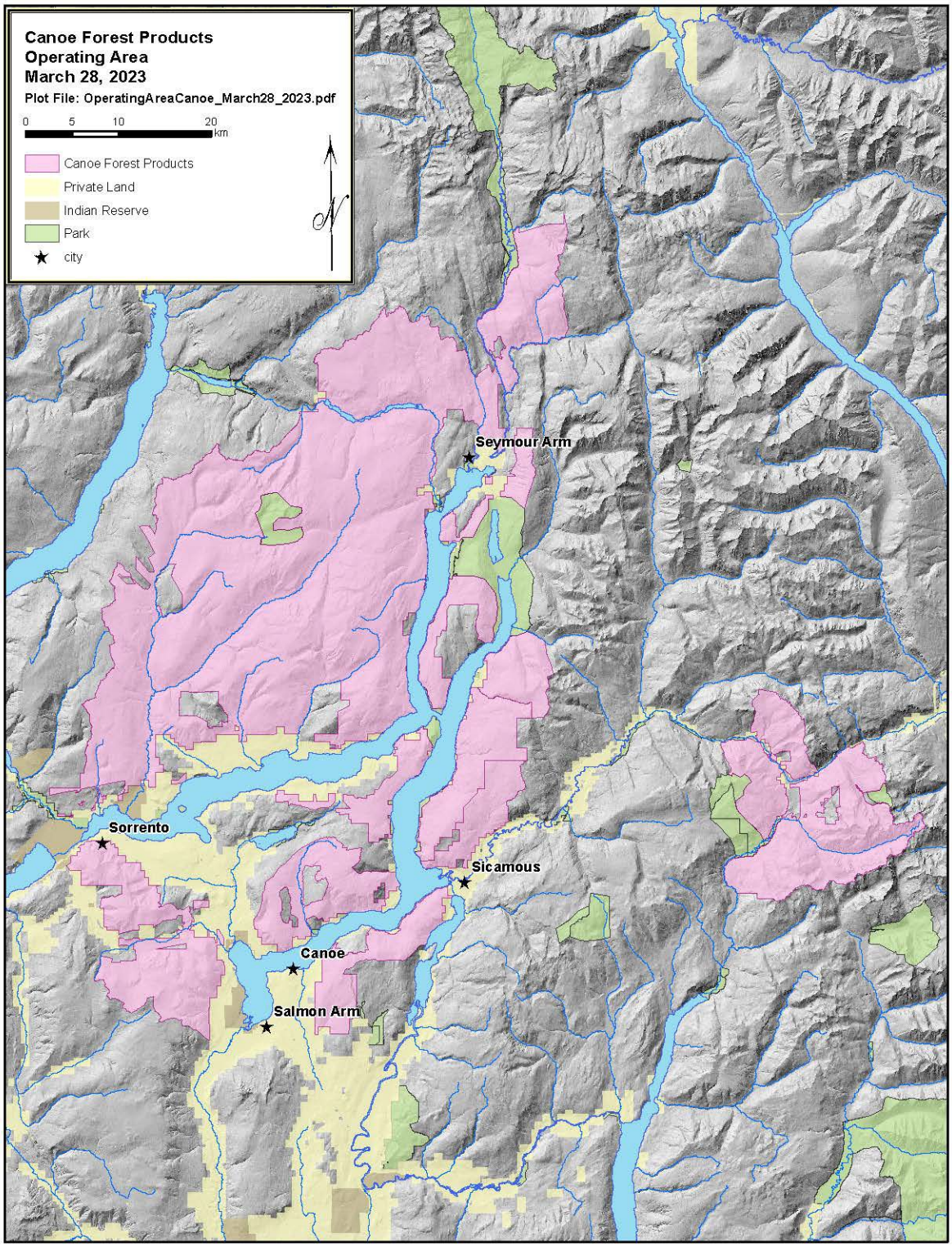
Woodlands activities end at the log dump / scale site and do not include the log yard, booming grounds, tugs, or sawmill/veneer facilities.



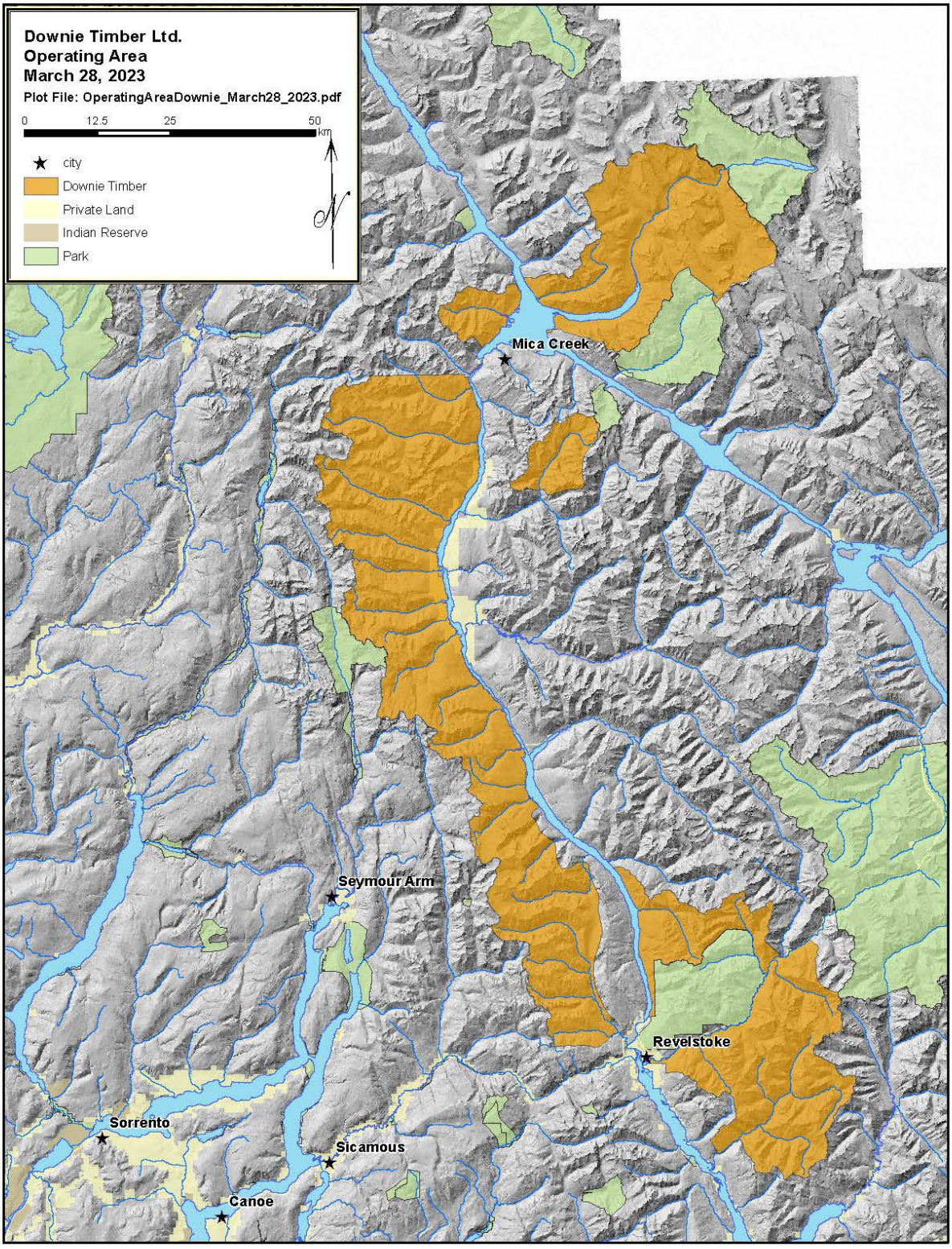
DOWNIE TIMBER LTD.

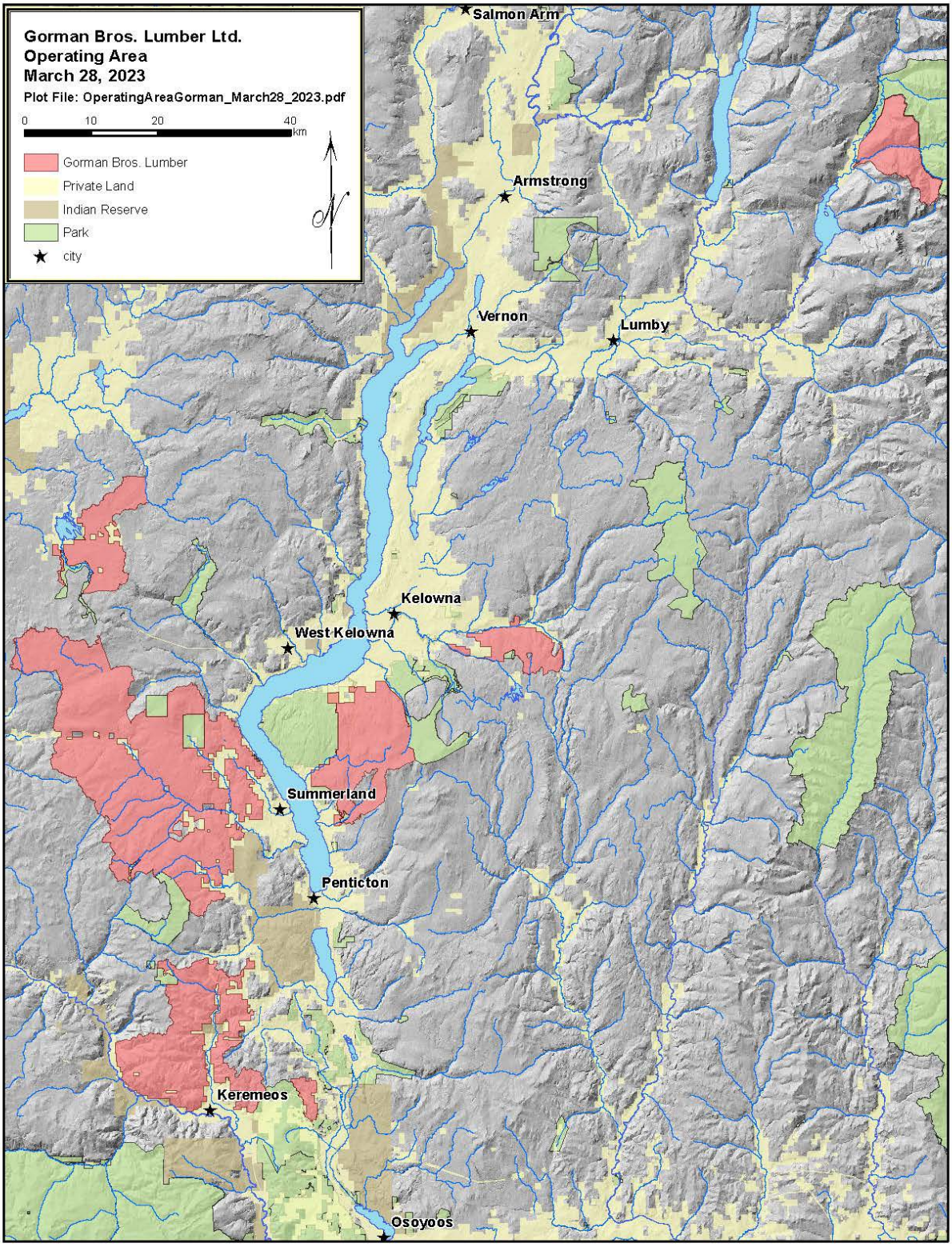
CANOE brand® Canoe Forest Products

GORMAN The Finest Boards®



DOWNIE TIMBER LTD. CANOE brand Canoe Forest Products GORMAN The Finest Boards





DOWNIE TIMBER LTD. CANOE brand Canoe Forest Products GORMAN The Finest Boards

OBJECTIVE 1. FOREST MANAGEMENT PLANNING.

To ensure forest management plans include *long-term* sustainable harvest levels and measures to avoid forest conversion or *afforestation* of *ecologically important* areas.

Performance Measure 1.1.

Certified Organizations shall ensure that forest management plans include *long-term* harvest levels that are sustainable and consistent with appropriate *growth-and-yield models.*

Indicator 1a & b: *Forest management planning at a level appropriate to the size and scale of the operation, including:*

a. *a long-term resources analysis;*

b. *a periodic or ongoing forest inventory;*

A long-term resource analysis is fulfilled by the higher level land use plans and Forest Stewardship Plans. The Revelstoke Minister's Advisory Committee (RMAC) plan and the Kootenay Boundary Higher Level Plan (KBHLP) cover DTL's operating areas and the Okanagan Shuswap Land and Resource Management Plan (OSLRMP) applies to CFP and GBL's operating areas. For TFL 33, Management Plan #9 applies. Various maps/reports for forest and other resource values (i.e. fish inventory, AOA's, water intakes, wildlife habitat areas etc.) are retained at the relevant office in hard copy and/or digital (GIS) format.

Timber Supply Reviews (TSRs) by Timber Supply Area (TSA) include the Okanagan TSA, Revelstoke TSA, Golden TSA and TFL 33 which are carried out every five to ten years. The TSR ensures that long-term harvest levels are sustainable and consistent with the appropriate *growth-and-yield models, social and environmental considerations,* and various land use / land management plans.

Long term harvest levels are calculated through the Timber Supply Review (TSR) process for the above management units. The Chief Forester determines the current Allowable Annual Cut (AAC) through the TSR process. The TSR incorporates the forest inventory and growth and yield data in conjunction with social and environmental factors. Other inventory inputs include terrain mapping, growth and yield modeling, forest health factors, silviculture treatments and other activities that affect the long-term harvest levels.

The Okanagan TSA has a Vegetation Resource Inventory (VRI) that was completed in 2010. by the Okanagan Innovative Forestry Society (OIFS) under an Innovative Forest Practices Agreement (IFPA). TFL 33 has its own forest cover inventory that is maintained by Canoe Forest Products. In the Revelstoke TSA and Golden TSAs, VRIs were completed in 2009 and 2011, respectively. Forest Inventory information is maintained by the MFLNRO.

Indicator 1c & d: *Forest management planning at a level appropriate to the size and scale of the operation, including:*

c. *a land classification system;*
d. *biodiversity at landscape scales;*
e. soils inventory and maps, where available

The Biogeoclimatic Ecosystem Classification (BEC) system is used in conjunction with the Vegetation Resource Inventories (VRI) to classify forestlands. BEC classifies the ecosystems based on categories of climate, soil, and vegetation. This classification system was developed in British Columbia and is widely used as a framework for resource management as well as for scientific research.

Biodiversity at the landscape scale has been addressed through the placement/designation of federal and provincial parks, protected areas, Ecological Reserves, and Old Growth Management Areas (OGMAS) *(refer to Objective 4 below for more detail)*.

Soils information is part of the BEC classification system as noted above. Soil stability mapping (terrain stability mapping) has been completed for the majority of the operating areas. Site-specific, field-level soils information is gathered on all harvest areas and road corridors at the Site Plan (SP) stage of harvest planning.

Indicator 1f: *Forest management planning at a level appropriate to the size and scale of the operation, including access to and use of growth-and-yield modeling capabilities.*

MFLNRO approved growth and yield models (VDYP, TIPSY etc.) are used within the TSR processes to estimate future volumes from forest stands.

Indicator 1g: *Forest management planning at a level appropriate to the size and scale of the operation, including up-to-date maps or a geographic information system (GIS).*

The BC Government LRDW site provides mapping and resource information for strategic forest planning through in-house GIS systems. TRIM, VRI, orthophotos, resource values data etc. are also utilized for forest planning purposes.

Indicator 1h: *Forest management planning at a level appropriate to the size and scale of the operation, including recommended sustainable harvest levels for areas available for harvest.*

The Chief Forester determines the Allowable Annual Cut (AAC) every 5-10 years, as described above. The AAC determination includes a timber supply analysis, social-economic analysis, public discussion paper, summary of public input and a rationale statement.

The objectives of this analysis include:

- identifying relevant current forest management practices and assessing their effects on short and long term timber supply;
- identifying related economic, environmental and social factors;
- identifying where improved information is required for future forecasts; and
- for interested parties to provide the Chief Forester (CF) with information to adjust the AAC.

The CF determines the AAC for each management unit in the *Rationale for AAC Determination*. The MFLNRO then allocates portions of the AACs to specific forest tenures through an apportionment and disposition process.

License holders develop specific harvest plans within their respective operating areas in a manner that are consistent with the TSR and local issues / resources such as watersheds, wildlife habitat, visual quality, etc.

Indicator 1i: *Forest management planning at a level appropriate to the size and scale of the operation, including consideration of non-timber issues such as recreation, tourism, pilot projects and economic incentive programs to promote water protection, carbon storage, bioenergy, feedstock production or biological diversity conservation, or to address climate-induced ecosystem change.*

Non-timber values are accounted for in the TSR where deductions are made to the land base for set-aside areas such as Parks and Biodiversity in the form of Old Growth Management Areas (OGMA's). Non-timber values such as ungulate winter range and visual quality objectives are accounted for in the analysis. These values are drawn from the OSLRMP, RMAC and KBHLP.

The Gorman Group participates in various projects to produce and provide the best information available for the TSRs applicable to the forest tenures, including forest inventory and growth (See Forestry Research, Science and Technology). CFP also leads projects and supplies the information directly for the TSR for TFL 33.

Indicator 2: *Documented current harvest trends fall within long-term sustainable levels identified in the forest management plan.*

Annual harvests are tracked through the government harvest billing system (HBS) and MFLNRO cut control statements. Annual allowable cut (AAC) is reconciled annually and must meet the 5-year cut control limits. Harvesting in excess of the legislated allowance results in a decreased harvest rate in the next 5-year period. The Timber Supply Review is a key part of the Forest Management Plan process in that short, mid, and long-term harvest levels are set at sustainable levels.

Indicator 3: *A forest inventory system and a method to calculate growth and yield is used to determine annual and/or periodic harvest levels.*

The forest inventories that apply to forest tenures consist of Provincial Government *Vegetation Resource Inventories* (VRI). The VRI is updated periodically as determined by the MFLNRO. Forest growth is accounted for by the use of forest growth models (currently VDYP and TIPSY) that "grow" managed and unmanaged stands electronically based on long-term permanent sample plot (PSP) data.

Indicator 4: *Periodic updates of inventory and recalculation of planned harvests to account for changes in growth due to productivity increases or decreases, including but not limited to: improved data, long-term drought, fertilization, climate change, changes in forest land ownership and tenure or forest health.*

Forest updates for operational activities (harvesting, planting, free growing, etc.) are reported electronically to the MFLNRO through the RESULTS application (**Re**porting **S**ilviculture **U**pdates and **L**and **S**tatus **T**racking **S**ystem). There is both a spatial and tabular component to the submissions.

Other depletions (fires, insects, and disease) are accommodated by periodic updates of the forest cover conducted by the MFLNRO.

CFP manages the inventory data base for TFL 33 through an Arc Info Geographic Information System (GIS). The updates are used in the TSR as part of the current inventory. Cut block level data is input into an internal data management system PhoenixPro that provides the basis for RESULTS submissions.

Planned harvest levels are determined as described above in the TSR process, which considers all factors described in the Indicator.

Indicator 5: *Documentation of forest management (such as: planting, fertilization, and thinning) consistent with assumptions in harvest plans*

Forest practices are confirmed at the site level through documented planting inspections and silviculture surveys that are tracked through the PhoenixPro activity tracking system and reported to government through the RESULTS database.

Documents related to forest practices are kept on file in the appropriate Woodlands office. Major milestones (at post-harvest, regeneration, and free-growing) are reported through the RESULTS system.

Indicator 6: *Assessment of the local or regional social, environmental, and economic effects of forest management operations contained in the forest management plan.*

Planned harvest levels for the Okanagan Timber Supply Area (TSA) are determined as described above in the TSR process, which considers all factors described in Indicator 1h above. Generally, a new AAC is set at least once every 10 years. Effective January 27, 2022 the Okanagan TSA allowable annual cut (AAC) was reduced from 3.1 million cubic metres to 2,462,800 m^3. The new harvest level will take effect when the Minister of Forests makes the apportionment of this new AAC to the various licence groups. It is not known when this will happen.

Performance measure 1.2.

Certified Organizations shall not convert one forest cover type to another forest cover type unless an assessment has been conducted to determine ecological impacts and provide justification.

Indicator 1: *Certified Organizations shall not convert one forest cover type to another forest cover type, unless the conversion:*

a. *does not convert native forest cover types that are rare, ecologically important, or that put any native forest cover types at risk of becoming rare; and*

b. *does not create significant adverse impacts on Forests with Exceptional Conservation Value, old-growth forests, forests critical to threatened and endangered species, or special sites, or ecologically important non-forest eco-systems; and.*

c. *Includes objectives for long-term outcomes that support maintaining native forest cover types and ecological function; and*

d. *is in compliance with relevant national and regional policy and legislation related to land use and forest management.*

Conversion of forest cover types does not occur within the tenures in this SFMP.

Reforestation of harvested areas is regulated in FRPA, and strongly guided by the Chief Foresters Stocking Standards that describe ecosystem-specific options for regenerating harvested areas. These stocking standards are assigned to each cut block by a Registered Professional Forester (RPF) from the appropriate government-approved Forest Stewardship Plan. Stocking standards adhere to legislated requirements (FRPA) and include ecologically appropriate species for the site series and site condition.

There are no “Forests with Exceptional Conservation Value” identified or otherwise known within the scope of this SFMP. Old-growth forests, forests critical to threatened and endangered species and special sites are identified as part of land use planning processes led by Government agencies and are contained in the GIS systems at each Division.

Indicator 2: *A proposed conversion deemed appropriate per 1.2.1, and which has considered impacts relative to scale, may be implemented subject to a landscape assessment that considers:*

a. *A response to address forest health issues such as pests or pathegens, or proactive consideration of anticipated impacts of fire or climate change, reforestation challenges, or riparian protection needs, provided that such justification is supported by the best scientific information;*
b. *Site productivity, economics, and/or stand quality;*
c. *Ecological impacts of the conversion at the site and landscape scale, as well as consideration for any appropriate mitigation measures; and.*
d. *Appropriate consultation with local communities, Indigenous Peoples, and other stakeholders who could be affected by such activities.*

No stands will be converted to other forest types, however, should this be contemplated, the assessment will consider the factors listed in the Indicator.

Performance measure 1.3.

Certified Organizations shall have within the scope of their certification to this SFI Standard, forest lands that have been converted to non-forest land use.

Indicator 1: *Forest lands converted to other land uses shall not be certified to this SFI Standard. This does not apply to forest lands used for forest and wildlife management such as wildlife food plots or infrastructure such as forest roads, log processing areas, trails, etc.*

No such stands are included in the scope of this SFMP.

Performance measure 1.4

Certified Organizations shall not afforest in locations which negatively impact economically important natural communities, threatened and endangered species, or native natural communities which could be a risk of becoming rare.

Indicator 1: *Any afforestation activity must include an evaluation of the proposed site to determine the presence of:*

a. *Ecologically important or natural communities, or*
b. *Threatened and endangered species, or*
c. *Native natural communities that could be at risk of becoming rare.*

No afforestation activities are included in the scope of the Gorman Group licences or this SFMP.

Indicator 2: *Afforestation shall not occur on that location if the evaluation determines a negative impact to:*

a. *Ecologically important or natural communities, or*
b. *Threatened and endangered species, or*
c. *Native natural communities that could be at risk of becoming rare.*

No afforestation activities are included in the scope of the Gorman Group licences or this SFMP.

TFL 33 – Management Plan #9, TSR, TSR Information Package
Data Management - RESULTS, PhoenixPro, ArcInfo GIS, ArcView & ForestOps
Okanagan TSA TSR, Revelstoke TSA TSR, Golden TSA TSR, OIFS TSR, MFLNRO Annual Cut Control Statements
FSPs and Chief Forester Provincial Stocking Standards

OBJECTIVE 2. FOREST HEALTH AND PRODUCTIVITY.

To ensure long-term forest productivity, forest health, and conservation of forest resources through prompt reforestation, afforestation, deploying integrated pest management strategies, minimized chemical use, soil conservation, and protecting forests from damaging agents.

Performance measure 2.1.

Certified Organizations shall promptly reforest after final harvest.

Indicator 1: *Documented reforestation plans, including designation of all harvest areas for either natural, planted or direct seeded regeneration and prompt reforestation, unless delayed for site-specific environmental or forest health considerations or legal requirements, through planting within two years or two planting seasons, or by planned natural regeneration methods within five years.*

All harvest areas are designated for either natural or artificial regeneration based on site level ecological information collected prior to harvesting. Stocking standards are assigned for each cut block by a Registered Professional Forester (RPF) from the appropriate government-approved Forest Stewardship Plan. Stocking standards adhere to legislated requirements (FRPA) and include ecologically appropriate species for the site series and site condition.

Legislated reporting dates are affixed in the stocking standards for Regeneration Delay and Free Growing Date.

Artificial regeneration (planting) occurs within two years of harvest completion, unless delayed for site-specific environmental or forest health considerations. Natural regeneration methods target full reforestation within 5 years of harvest. Reforestation levels are confirmed through silviculture surveys, compliance records and field evidence. Provincial laws (i.e. FRPA), regulations and relevant guidelines provide the framework for reforestation practices and parameters.

Indicator 2: *Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas and achieve acceptable species composition and stocking rates for planting, direct seeding and natural regeneration.*

Regeneration progress towards meeting free growing standards is monitored through surveys that assess stocking, species composition, survival, growth and competition. Where plantation stocking and/or performance is unacceptable, treatments are carried out to meet the stocking standard requirements. Survey information is tracked in a data management system (PhoenixPro), and milestone dates (Regeneration, Free Growing) are reported through RESULTS.

Indicator 3: *Plantings of native or non-invasive naturalized tree species are preferred. In exceptional circumstances where exotic tree species are being planted, they should not increase risk to native ecosystems.*

Stocking standards used for reforestation activities adhere to legislated requirements (FRPA) and include ecologically appropriate species for the site series and site condition. Exotic species are not utilized in reforestation, nor are they contained in any of the Forest Stewardship Plans.

Indicator 4: *Protection of desirable or planned advanced natural regeneration during harvest.*

Desirable advanced regeneration (ecologically suitable species) and some of the deciduous component are protected during harvesting and post-harvest treatment to the extent practical. The amount of advanced regeneration retained will depend on its quantity and quality as well as the harvest system (i.e., ground based, cable or aerial).

The Site Plan (SP), signed by an RPF, describes the criteria for the retention of advanced regeneration, which is then carried over to the Logging Plan. Harvest inspections document the level of compliance with Site Plan – i.e., the extent to which advanced natural regeneration and deciduous species were protected.

Performance measure 2.2.

Certified Organizations shall have a program to minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public and the environment, including wildlife and aquatic habitats.

Chemical applications are a viable tool in meeting Free Growing obligations.

DTL's operating area is located in British Columbia's Interior Wet Belt Zone which has very productive growing sites but also brush competition challenges.

DTL utilizes chemical brushing to a limited extent within their operation.

Neither GBL nor CFP apply herbicides or pesticides to reduce brush competition.

***Indicator 1**: Pest Management shall be implemented through the use of integrated pest management.*

Chemical brushing activities within the Downie operations are consistent with their Government approved Pest Management Plan (PMP). A site level assessment is conducted to determine which brush control measure will be effective at achieving specified forest management objectives. The PMP specifies management practices and procedures by distinct operating zones. Each operating zone has different management objectives based upon site level characteristics such as proximity to riparian areas, fish habitat and community water supply areas.

***Indicator 2**: Minimized chemical use required to achieve management objectives.*

Within the range of treatment options available for post-harvest treatments to address competition (i.e. mechanical brushing, chemical spraying, seedling selection etc.), the preference is to employ mechanical brushing or other non-chemical means. However, where necessary, and where permitted by land-use plans and site level analysis, chemical use may be the most effective treatment.

Fertilizer application is restricted to the use of tea-bag fertilizer packets during planting / reforestation activities on selected sites within the Downie operations. No broadcast fertilizer applications are conducted.

Government approved PMPs specify the standards and requirements applicable when prescribing chemical applications. Detailed prescriptions are developed by qualified professionals and are consistent with the PMP.

***Indicator 3:** Use of least-toxic and narrowest-spectrum pesticides necessary to achieve management objectives.*

The PMPs are reviewed by the Ministry of Environment and are consistent with the statues and regulations such as the Pesticide Control Act. The PMP specifies which chemicals are permissible for application.

The PMP incorporates information from an Integrated Pest Management (IPM) Program that monitors the effectiveness of chemical application based upon biological, physical and cultural impacts on it's effectiveness at meeting specified management objectives.

***Indicator 4:** Use of pesticides registered for the intended use and applied in accordance with label requirements.*

The PMP specifies those chemicals that are permitted and approved for use by the Ministry of Environment.

Indicator 5: *The World Health Organization *(WHO) type 1A and 1B pesticides shall be prohibited, except where no other viable alternative is available.*

The WHO type 1A and 1B pesticides are those that acutely toxic chemicals that cause health problems shortly after exposure.

Glyphosate, triclopyr and tordon are the herbicides of choice for use in chemical brushing programs. None of these are on the WHO type 1A and 1B list.

Indicator 6: *Use of pesticides banned under the Stockholm Convention on Persistent Organic Pollutants (2001) shall be prohibited.*

The Stockholm Convention list of PoPs includes the “dirty dozen” of persistent organic compounds. The commonly used forestry herbicides are not on the Stockholm list.

Indicator 7: *Supervision of forest chemical applications by state-or provincial-trained or certified applicators.*

The PMP specifies those individuals who are certified / authorized to develop, implement and supervise chemical spraying operations. The Environmental Management System (EMS) states the policies, programs and plans pertaining to pesticide use, including evaluations of the effectiveness of the PMP and on-going training and supervision requirements.

Indicator 8: *Use of management practices appropriate to the situation. (see Standard for complete listing)*

Management practices are outlined above. Additional, site specific information is contained in the Site Prescriptions, and PMP.

Performance Measure 2.3.

Certified Organizations shall implement practices that *protect* and maintain forest and soil *productivity* and *soil health*.

Indicator 1: *Process to identify soils vulnerable to compaction, and use of appropriate methods including the use of soil maps where available to avoid excessive soil disturbance.*

Field-based soil classifications (with the aid of soils maps where available) to identify soils that are vulnerable to compaction are conducted by qualified Forest Professionals, who also make recommendations regarding the management and avoidance of vulnerable soils during forest management activities.

Terrain mapping, where available, identifies potentially unstable and unstable terrain. For proposed roads and/or cut blocks located in mapped unstable and potentially unstable terrain polygons, a site level inspection is performed by a qualified professional, and the recommendations are incorporated into operational plans. Field observations at the site level are collected on all roads and cut blocks during plan preparation.

Indicator 2: *Use of erosion control measures to minimize the loss of soil and impacts to site productivity.*

Erosion control measures (i.e., road construction and maintenance programs, slide rehab, grass seeding) are consistent with the practice requirements for soil conservation contained within the FPPR and the results/strategies of the FSP. Operational plans contain site specific measures, including shutdown criteria specified in the EMS. Where beneficial, erosion control techniques are employed while constructing or deactivating roads, *e.g.*, silt fencing and hay bales etc.

Indicator 3: *Postharvest conditions conducive to maintaining site productivity (such as: retained down woody debris and minimized skid trails).*

Site and operational plans prescribe operations in a manner intended to maintain site productivity are developed prior to harvest. Inspections during operations monitor soil impacts, while post-harvest inspections are conducted on all harvest areas to confirm site plan requirements have been met.

Indicator 4: *Retention of vigorous trees during partial harvesting consistent with scientific silvicultural standards for the area.*

Where partial harvesting is employed, vigorous trees are retained to the extent practical according to the operational plans that contain cutting and retention criteria. Inspections during operations monitor required retention levels, while post-harvest inspections conducted on harvest areas confirm site plan requirements have been achieved.

Indicator 5: *Practices that address harvesting and site preparation to protect soil productivity and soil health.*

Soil disturbance limits are prescribed in the FSP, while sensitive soils are identified in the site plans. Soil conservation measures are prescribed in the specific Site Plan and/or Logging Plan. These measures could include restrictions on timing of operations, season of operation, cable versus ground skidding, etc. Pre-work meetings with the contractor ensure that critical site factors are identified, while interim and final inspections monitor site degradation levels and intended outcomes.

Indicator 6: *Road construction, skidding layout, and harvest plans designed to minimize impacts to soil productivity and soil health.*

The FSPs specify maximum allowable limits for site degradation due to access and harvesting disturbances. Terrain and soil maps are used in conjunction with field-level information in planning and assessing road location, layout, and design.

Performance Measure 2.4.

Certified Organizations shall manage to *protect forests* from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases and *invasive species*, to maintain and improve *long-term forest health*, *productivity* and *economic viability.*

Indicator 1: *Program to protect forests from damaging agents.*

Damaging agents include windthrow, fire, pests and diseases. The MOF monitors forest health concerns by conducting aerial overview flights on an annual basis and making the results available to Licensees for consideration in developing harvest plans. Aggressive salvage harvesting is conducted consistent with Forest Health strategies contained in the FSPs, while considering and managing impacts to other resource values to acceptable levels.

Post harvest slash accumulations result from forest harvesting activities. These accumulations are generally piled and burned, ground and hauled offsite, or may be dispersed in such a way as to reduce fuel loading and/or the risk of ignition. In some instances, slash piles will be retained in low-risk areas to serve as wildlife habitat features.

Site level plans developed by Registered Professional Foresters assess current and potential forest health factors and prescribe appropriate management actions.

Indicator 2: *Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents.*

The FRPA, KBHLP, RMAC and the OSLRMP contain direction on strategies and approaches to addressing forest health issues, which is delivered through the FSPs.

Prompt regeneration of multiple species through a combination of planted and natural regeneration promotes a diverse second growth stand. Site preparation, slash management, and fertilizers are some of the techniques used to encourage the growth of seedlings.

Indicator 3: *Participation in, and support of fire and pest prevention and control programs.*

Fire Preparedness and Response Plans are updated annually. These plans set out the requirements for fire fighting preparedness, education, training, and appropriate fire fighting tools. Inspections are conducted during operations ensure compliance with the Fire Preparedness Plans. CFP and GBL participate in the Okanagan Shuswap TSA Steering Committee, and also provide input to Provincial initiatives such as the Wildfire Act and the proposed Open Burning Smoke Control Regulation.

The province collects an annual fire protection levy from each licensee in return for fire fighting services.

Performance Measure 2.5.

Certified Organizations that deploy *improved planting stock*, including *varietal seedlings*, shall use best scientific methods.

Indicator 1: *Program for appropriate research, testing, evaluation, and deployment of improved planting stock, including varietal seedlings.*

All forest regeneration is conducted according to the Chief Forester's Standards for Seed Use. These standards apply to:

a) A person who uses seeds or vegetative material for the purposes of establishing a stand under section 29 of the Forest and Range Practices Act.

The purpose of these standards is to maintain the identity, adaptability, diversity and productivity of the Province's tree gene resources by;

a) Establishing criteria for the registration of seedlots and vegetative lots used to establish a stand under section 29 of the Act, and

b) Regulating the storage, selection, use and transfer of registered lots.

Suitable seedlots are chosen at the time of sowing from the MOF **S**eed **P**lanning **A**nd **R**egistration (SPAR) system and are also identified at the time of the Free Growing declaration in the RESULTS system. An appropriate seedlot that conforms to the Chief

Forester's Standards for Seed Use must be used unless a rational for variance is submitted and accepted by the MOF.

All seedlings are grown in privately owned nurseries, each of which is involved in various research endeavours and trials for the forest industry and the MOF.

Objective Supporting Information and Records
FSPs
SPs, Operational Plans – hard copies kept on file.
SPAR, PhoenixPro, RESULTS
Chief Foresters Standards for Seed Use

OBJECTIVE 3. PROTECTION AND MAINTENANCE OF WATER RESOURCES.

To protect the water quality and water quantity of rivers, streams, lakes, wetlands, and other water bodies.

Performance Measure 3.1.

Certified Organizations shall meet or exceed all applicable federal, provincial, state and local water quality laws and meet or exceed best management practices.

Indicator 1: *Program to implement federal, state or provincial water quality Best Management Practices during all phases of management activities.*

Our commitment to maintaining water quality will be met through the fulfillment of the objectives, results and strategies stated within the approved FSPs. The FSP are consistent with current Provincial legislation and incorporate Best Management Practices (measures) from the relevant land use plans (KBHLP, RMAC or OSLRMP). The measures contained in the FSPs are generally more stringent than the provincial requirements.

Criteria for carrying out activities around streams, lakes and wetlands are addressed within the FSP and associated operational plans. Monitoring and implementation of those activities is conducted according to Best Management Practices (BMP's) within the EMS program. If conditions are identified where operations on sensitive soils may impact water quality, those activities are restricted or managed by including measures in the appropriate Operational Plan.

Training, awareness, and competency of staff and contractors are key components of a program aimed at managing impacts to the environment. The EMS requires a training program to identify, deliver and record environmental training events for all individuals that have potential to significantly impact the environment. Further procedures, pre-work checklists, and ongoing inspections address specific environmental aspects such as water quality and management practices within riparian zones. Professional and technical staff that conduct site level planning prescribe activities in a manner compliant with water quality and riparian management regulations. The professional and technical staff and contractors participate in various provincial BMP training sessions such as gully assessment, windthrow assessment, etc.

Indicator 2: *Contract provisions that specify conformance to best management practices.*

All contracts include a commitment to conduct work in accordance with SFI and other systems. Contractors that have the potential to significantly impact the environment are required to have various certifications and training appropriate to the level of risk associated with their activity and are required to comply with EMS.

Indicator 3: *Monitoring of overall Best Management Practices implementation.*

Monitoring and measurement of Best Management Practices are carried out at a frequency described in the EMS. Pre-work, interim, and final inspections as well as internal audits are completed on a regular basis by both Supervisors and contractors to monitor quality and ensure compliance with operations plans and contract specifications. Government agencies also conduct compliance inspections on an infrequent basis.

Performance Measure 3.2.

Certified Organizations shall implement water, wetland and riparian protection programs based on climate, soil type, terrain, vegetation, ecological function, harvesting system, state best management practices (BMPs), provincial guidelines and other applicable factors.

Indicator 1: *Program addressing management and protection of water quality of rivers, streams, lakes, wetlands, other water bodies and riparian areas during all phases of management.*

Prescriptive measures to protect water quality and riparian zones are specified in Land Use Plans, incorporated into FSPs as results / strategies, specified in SPs as prescriptive measures, and ultimately applied on the ground through the implementation of operational plans.

Staff and Contractors are required to be trained in EMS awareness, as well as specific Best Management Practices pertaining to the appropriate management of all water resources.

Supervision of contractors during layout, construction, harvesting and site preparation (silviculture) phases ensures that plans and prescriptions pertinent to management of water features are fully and properly implemented.

Emergency Measures to protect water quality are also found in the Spill Prevention and Response Plans.

Indicator 2: *Program to protect water quality during all phases of management.*

Road and harvesting site plans and other operational plans specify protection measures for streams, sensitive soils or wet soils and water bodies during harvesting, road construction and other forest activities. Specific measures to protect water quality and riparian zones are found within the FSPs and Site Plans developed by Forest Professionals. Inspections and monitoring conducted through the EMS by Company Supervisors verify that measures are implemented correctly.

Road and stream crossing infrastructure planning will include consideration of climate change strategies (i.e., consideration of removals/ rehab as well as upsizing upgrades to existing structures and new installations as required).

Indicator 3: *Programs that address wet-weather events in order to maintain water quality such as forest inventory systems, identification of wet-weather tracts and definitions of acceptable operating conditions.*

Shutdown criteria are specified in all Operational Plans, Standard Operating Procedures, and within the elements of the EMS. Company Supervisors and contractors monitor weather conditions that could cause operations to be shut down.

Objective Supporting Information and Records
FSP
SP's, Operational Plans – hard copies kept on file and/or electronically stored
PhoenixPro, RESULTS

OBJECTIVE 4. CONSERVATION OF BIOLOGICAL DIVERSITY.

To maintain or advance the conservation of biological diversity at the stand- and landscape-level and across a diversity of forest and vegetation cover types and successional stages including the conservation of forest plants and animals, aquatic species, threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests and ecologically important sites.

Performance Measure 4.1.

Certified Organizations shall conserve biological diversity.

Indicator 1: *Program to incorporate the conservation of biological diversity, including native species, wildlife habitats, and ecological community types at the stand and landscape levels, through the use of best scientific information including the incorporation of research results.*

Land Use Plans provide the framework for conservation of biological diversity through a 3 layered approach that entails the identification and establishment of Parks and Protected Areas, designation of Old Growth Management Areas (OGMAs), and site specific wildlife tree retention areas (WTRAs) and riparian reserves. Special wildlife habitats (e.g., caribou in the north, and a variety of arid/dry-belt species in the south) are protected through establishment of Wildlife Habitat Areas, and government Orders (GAR) that identify / restrict forest management practices in specific habitat types.

This legal framework is reflected within the FSPs and other operational plans.

Professional and technical staff involved in site level planning and layout must consider Identified Wildlife, rare/important/endangered wildlife and/or plant communities when developing prescriptions. Where these habitats/species/communities coincide with forest management activities, appropriate measures must be developed for the Site Plan – such measures are often prepared in consultation with qualified biologists. Operational implementation and monitoring is conducted through the EMS mechanisms.

Consistent with the FSPs, between 3 and 11% of a cut block area is retained as Wildlife Tree Retention Areas (WTRA) - the specific amount of WTRA in the Okanagan TSA required is dependent on the Landscape Unit and Biogeoclimatic subzone.

In the Revelstoke TSA, WTRA retention levels are dependant on block size, harvest method and salvage considerations as specified in the FSP.

Indicator 2: *Development of criteria, and implementation of practices as guided by regionally based best scientific information, to retain stand-level wildlife habitat elements such as snags, stumps mast trees, down woody debris, den trees and nest trees.*

Stand level biodiversity and wildlife habitat elements are addressed through retention of wildlife tree retention areas (WTRA) consisting either of individual or patches of trees. The FSPs specify the requirements for WTRA retention and measures for management of old growth management areas (OGMAs).

Coarse Woody Debris retention levels are specified for sites, while standing trees and stubs are often left within blocks providing structural diversity.

Mixed species planting is encouraged, especially where root disease is present. Where it does not interfere with free growing criteria, deciduous trees and understory vegetation are retained as part of the post harvest stand.

Trees that contain active bird nests are protected from harvest by Wildlife Habitat Areas, federal /provincial legislation, or as described within each Division's Species at Risk Guidebook.

Pre-works conducted under the EMS ensure that these elements are communicated to the Contractor, while regular inspections ensure the required results / objectives are achieved.

Indicator 3: *Program to individually and/or through cooperative efforts such as SFI Implementation Committees, support diversity of native forest cover types and age or size classes that enhance biological diversity, by incorporating the results or analysis of documented diversity at landscape and ownership tenure levels, to ensure the contribution of the managed area to the diversity of conditions that promote biodiversity.*

Forest License tenures are "volume based" licences that can be exercised anywhere within the respective Timber Supply Area. Hence the "tenure area" and the "landscape" are one in the same.

All three TSAs have recently updated forest cover inventory information that provides the basis for analysis of forest types and management conditions for planning purposes.

In addition, the Biogeoclimatic Ecosystem Classification (BEC) is used to classify forested ecosystems. The BEC is a hierarchical system that uses climate, soil and vegetation to group ecosystems at various levels, including regionally, locally and chronologically.

Predictive ecosystem mapping (PEM) has been completed for the majority of DTL's operating area and all of the Okanagan TSA. The results can be used for watershed or sub-unit planning purposes to highlight potential habitat and plant community areas.

These inventories were developed through cooperative efforts of Government and Industry partnerships and form the basis for forest management and conservation planning.

The Tree Farm Licence tenure is an "area-based" tenure – this tenure has a specific management plan and inventory. For the purposes of this SFMP, the "tenure" and the

"landscape" scales can be considered the same. The Management Plan for the TFL contains all the information specified by this Indicator.

Indicator 4: *Certified Organizations shall individually and/or through cooperative efforts such as SFI Implementation Committees, participate in or incorporate the results of credible, relevant state, provincial, or regional conservation planning and priority-setting efforts to conserve biological diversity and incorporate the results of these efforts in forest management planning. Credible priority-setting efforts include state and provincial wildlife action plans, state forest action plans, relevant habitat conservation plans, provincial wildlife recovery plans, Indigenous planning processes or ecoregional plans.*

The Companies each participated in the development of the local land use plans:

- The Okanagan Shuswap Land and Resource Management Plan,
- The Kootenay Boundary Land Use Plan, and
- Revelstoke Minister's Advisory Committee

These Plans address all biodiversity, wildlife and social values within the respective planning units. Forest Stewardship Plans take these Plans into account in the Results, Strategies and Measures and also include measures to address specific wildlife and habitats as identified and designated by the Ministry of Environment. Forest management activities are consistent with both the Plans and the FSPs.

Indicator 5: *Program to address conservation of ecologically important species and natural communities.*

Government Agencies (Ministry of Environment or Forests) have designated "Wildlife Habitat Areas" to conserve / protect known occurrences of species of concern or their habitats. Each of these "WHA's" have a set of prescribed measures that dictate the requirements for land management in or adjacent to the feature /occurrence. These areas range from 1 hectare for amphibians or bat hibernacula, to 1,000s of hectares for Grizzly Bear or Mountain Caribou.

Management of identified wildlife and rare/important plant communities that are identified from inventory information or during fieldwork are addressed by legislation, the FSPs, and mitigating measures contained in site level plans.

For example, Wildlife Habitat Areas (WHAs) have been established for the Coeur d'Alene Salamander in DTL's operating area, and for Williamson's Sapsucker in the GBL operating area.

Specific requirements for Marten, Fisher, Bighorn Sheep, Moose, Mountain goat, Mule Deer, and Caribou have been adhered to within the Okanagan TSA through inclusion of specific measures in landscape level planning and specific Site Plans.

Much of the Engelmann Spruce Subalpine Fir subzone located within northern portion of the Okanagan TSA is designated Caribou Reserve as part of a recovery strategy. Caribou GAR reserves have been mapped as no-harvest areas.

Approximately 2,200 hectares of Enhanced Riparian Reserves (ERR) has been previously identified within the Okanagan TSA. The ERR connects OGMA's and places more sensitive riparian area into reserves.

Indicator 6: *Identification and protection of non-forested wetlands, including bogs, fens and marshes, and vernal pools that are ecologically important.*

Together, the FRPA and FSPs have a comprehensive framework for identification and management of riparian features described. Strategies generally include full or partial retention of forested areas proximal to features of interest.

Indicator 7: *Participation in programs and demonstration of activities as appropriate to limit the introduction, spread and impact of invasive species that directly threaten or are likely to threaten native plants and animal communities.*

CFP: Invasive plants are the focus of the Invasive Plant Guidebook. Identification of invasive plants and some simple management strategies, such as grass seeding disturbed soils, are helpful in mitigating spread of invasive plants.

DTL: Where the introduction or spread of invasive plants is likely, invasive plant management will be conducted in accordance with the measures provided in Downie's FSP and operational plans.

GBL: Gorman Bros. participates in the Okanagan and Similkameen Invasive Species Society (OASISS) as a member. Forest operations in areas where the introduction or spread of invasive plants is likely are conducted in accordance with the measures provided in the FSP.

Indicator 8: *Consider the role of natural disturbances, including opening size, structural retention, the use of prescribed or natural fire where appropriate, and forest health threats in relation to biological diversity when developing forest management plans.*

As per FPPR Section 9, the areas planned for timber harvesting, where practicable, are to resemble, both spatially and temporally, the patterns of natural disturbance that occur within the landscape. This may include retaining standing trees, stubs and/or tree

pieces across sites subject to timber harvesting to meet the coarse woody debris requirements for the harvested area.

With the exception of roadside and landing slash accumulations and in block slash piles prescribed fire / broadcast burning is not used due to the high level of risk and the potential negative consequences to coarse woody debris.

In recognition that fire is an important tool in reforestation and ecosystem health, GBL and CFP are involved with the Steering Committee of the MOF Ecosystem Restoration Program. The purpose of the ER program is to re-introduce fire into certain fire-maintained ecosystems through fuel management and prescribed burning at appropriate times of the year. Most of the activities occur outside the commercial forest land base at this time.

Performance Measure 4.2.

Certified Organizations shall protect threatened and endangered species, critically imperiled and imperiled species (Forest with Exceptional Conservation Values), and natural communities, and old-growth forests.

Indicator 1: *Program to protect threatened and endangered species.*

Under the Province's *Government Actions Regulation* (GAR), notices may be published establishing Wildlife Habitat Areas, Wildlife Habitat Features, Species at Risk areas etc. GCD complies with all requirements of these notices and will comply with requirements of future notices. Examples of GAR notices include the Great Basin Spadefoot, the Coeur d'Alene Salamander, and Mountain Caribou Ungulate Winter Range.

CFP's Species at Risk Guidebook was derived by reviewing the BC Ministry of Environment's "BC Species and Ecosystem Explorer" and filtering down to species and ecosystems within CFP's operating area. The Guidebook assists through identification and management strategies (including stop work) in protecting species at risk including threatened or endangered or critically imperiled or imperiled plants, animals, and ecological communities.

GBL has developed a SOP for Rare /Endangered Species along with a GIS coverage that incorporates the "red/blue" species resource management zone from the OSLRMP, Conservation Data Center known sightings for rare species, and likely areas of occurrence for identified species of concern. Site specific strategies are developed through the course of development and implemented through the EMS framework for operations.

The Revelstoke Higher Level Plan Order (RHLPO) includes management requirements for grizzly bears. DTL complies with the RHLPO requirements for managing grizzly bear habitat.

The federal government Species at Risk Act website provides an email notification for changes regarding species at risk.

Annual training around threatened and endangered species awareness is provided for staff and contractors as part of the EMS.

Indicator 2: *Program to locate and protect known sites of flora and fauna associated with viable occurrences of critically imperiled and imperiled species and ecological communities, defined as Forest with Exceptional Conservation Value. Programs for protection may be developed independently and/or through collaborative efforts involving SFI Implementation Committees and may include Certified Organization managers, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies.*

Forests with Exceptional Conservation Value (FECVs) are those ecosystems that support critically imperiled or imperiled species. In British Columbia, the Conservation Data Center is used as a source of current/best information on the occurrence of such species.

By definition, critically imperiled, or imperiled species are classified as G1 or G2, meaning they are globally rare and/or vulnerable to extinction.

All provincial forest tenure holders in BC are required to follow legal requirements that include addressing the federal Species at Risk Act in those instances where species have been designated, and recovery plans have been formulated.

FECV's have been incorporated into the Old Growth Management Areas (i.e. – considered in recovery planning for Caribou and White-headed Woodpecker) or addressed within site specific plans such as FSP's, SP's, or WHAs.

(Also Refer to Performance Measure 4.1, Indicator 5, above.)

WCSIC has completed an FECV Assessment covering BC, AB and SK that is available on the members section of the website.

FECV Best Management Practices are included in the WCSIC FECV Assessment.

Indicator 3: *Support of and participation in programs for the conservation of old growth forests in the region of ownership or forest tenure.*

Old Growth Management Areas were identified within the Okanagan TSA by a joint committee, including environmental groups, prior to 2004. These areas are treated as reserves with limited or minor incursion allowed. The joint committee used a geographic information system and available forest cover information. OGMA selection criteria included an "oldest first" priority within a Biogeoclimatic subzone / Landscape Unit combination. Other criteria included rare ecosystems, sensitive terrain, caribou habitat, riparian areas, wetlands, recreation features, and Lakeshore Management Zones.

Within the Revelstoke and Golden TSAs, OGMA's are a legal requirement and must be managed to the levels specified in the Revelstoke and Golden Higher Level Plan Orders. DTL has spatially identified OGMA's within their operating area using criteria contained in these Orders.

In 2021, the Province identified 2.6 million hectares of "old" forests where forest harvesting is temporarily deferred while the Old Growth Strategy is developed (target completion is December 2023). While that process occurs, the Gorman Group is working with several First Nations to plan and implement forest management activities in a manner consistent with the conservation and management of old forests. The approach differs depending on the Nation involved. Details are contained in Site Plans and other operational documents.

Performance Measure 4.3.

Certified Organizations shall manage to protect ecologically important sites in a manner that takes into account their unique qualities.

Indicator 1: *Use of information such as NatureServe or natural heritage data or expert advice in identifying or selecting ecologically important sites for protection.*

Refer to Indicator 2 below.

Indicator 2: *Appropriate mapping, cataloging and management of identified ecologically important sites.*

Ecologically important sites were identified, mapped, and catalogued as part of the OSLRMP process for establishing "Goal 2" parks. These areas have been designated as Parks, Protected Areas, Ecological Reserves, or other designations that effectively exclude them from the forest harvesting land base.

Performance Measure 4.4.

Certified Organizations shall apply knowledge gained through research, science, technology, and field experience and the results of monitoring of the effectiveness of conservation-related *programs* to manage *wildlife habitat* and contribute to the *conservation of biological diversity*.

Indicator 1: *Collection of information on Forests with Exceptional Conservation Value and other biodiversity-related data through forest inventory processes, mapping, or participation in external programs, such as NatureServe, state or provincial heritage programs, or other credible systems. Such participation may include providing non-proprietary scientific information, time, and assistance by staff, or in-kind or direct financial support.*

Refer to Indicators 2 and 3 below.

Indicator 2: *A program to incorporate data collected, research results and field applications of biodiversity and ecosystem research into forest management decisions.*

The ABCFP, OBWB, PEFC, UBC Forestry, CDC, the MOF, and various other groups maintain websites and newsletters to disseminate information on current research projects. These information centers help to keep practitioners aware of new forest management techniques, public opinion and forest policy/guidelines.

CFP/GBL:

Results and Strategies contained in the FSP are consistent with the values and management direction identified through the OSLRMP process. Participation and funding are provided for ongoing research programs that provide the science used to support the objectives. For example, through membership in the Okanagan Innovative Forestry Society (OIFS), funding is provided to monitor caribou and wolf populations in the Shuswap area, and to establish post-harvest debris trials for Marten habitat in the Okanagan. Through membership in the OSLRMP Caribou Sub-committee, input is provided towards the implementation of the habitat identification and management regimes.

Both CFP and GBL have contributed sites and equipment time to construct research trials and have first-hand access to results. The results are incorporated in normal forest management activities such as debris piling, site preparation, and fuel hazard management as Best Management Practices.

The FSPs incorporates Objectives for Biodiversity including OGMA's, CWD, WTRA's etc. As research evolves, the results will be incorporated into operational plans through BMPs or as FSP results/strategies.

DTL:

Objectives in the FSP are tailored to meet the intent of the Revelstoke (RMAC) and Kootenay-Boundary Higher Level Plans. DTL participates in a variety of science-based initiatives to develop and support the FSP objectives. For example, the mapping of mountain caribou reserves and OGMAs was conducted in partnership with industry, government agencies, biologists and others. DTL has made FIA funding available for biodiversity and caribou projects and is supporting the Revelstoke Caribou Rearing in

the Wild Project. Membership with the Columbia Mountains Institute of Applied Ecology (CMI) provides a direct linkage to CMI's objectives of encouraging ecosystem research and the dissemination of knowledge. DTL is also an active member of "Links" – a local committee that links researchers and operation foresters, land managers, guides, outfitters and other users of forestlands. Information and findings arising from Downie's association with these groups are often incorporated into operational plans as Best Management Practices where operationally and economically feasible.

Indicator 3: *Individually or collaboratively participate in or support research that demonstrates the conservation outcomes resulting from management strategies.*

GBL is currently working in cooperation with Dr. Thomas P. Sullivan of the Applied Mammal Research Institute where Dr. Sullivan in studying the *Enhancement of Winter Range Habitat for Mule Deer in Douglas-fir Forests*. Harvest treatments consist of areas undergoing single tree selection, group selection, patch cuts of a variety of sizes and unharvested control sites at the field level. The overall goal of the project is to measure changes in mule deer habitat in at least five post harvest years.

Both DTL and CFP have been involved in various Land Use Plans that involve Caribou management as well as financial in-kind support of various Caribou programs including caribou monitoring, caribou pen construction and operation and other initiatives. DTL is continuing to provide ongoing financial support towards the caribou pen construction project managed by the Arrow Lakes Caribou Society.

Members of the Penticton Indian Band have been actively involved at the commencement of this project. They have identified the areas scheduled for treatment and have carried out the field development layout works within each block. This includes all field works within any *OSGR TAP Prioritized Big-Treed Old Growth* overlap areas.

WCSIC supports various research projects and shares reports and information with members via the WCSIC websites (members section) where these are made available. Refer to the *Projects Section* of the WCSIC website for a list of current projects.

Objective Supporting Information and Records
FSPs, FCL SAR Guidebook Version 1.0, FCL Invasive Plant Guidebook Version 1.0
SP's, Operational Plans – hard copies kept on file and/or electronically stored.
PhoenixPro, RESULTS

OBJECTIVE 5. MANAGEMENT OF VISUAL QUALITY AND RECREATIONAL BENEFITS.

To manage the visual impact of forest operations and provide recreational opportunities for the public.

Performance Measure 5.1.

Certified Organizations shall manage the impact of harvesting on *visual quality*.

Indicator 1: *Program to address visual quality management.*

Visual Quality Objectives (VQO) within known scenic areas have been established in the 3 TSAs and TFL 33. The FSPs contain legal results/strategies to manage for visual quality to a level that meets the standards determined in the Land Use Plans and legal orders.

The general objective for Scenic Areas is to maintain naturally appearing landscapes and to encourage new practices and techniques that maintain visual quality.

Indicator 2: *Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.*

Proposed cut blocks and roads within visually sensitive areas will be designed and assessed by a competent professional to ensure that the proposed developments meet the definition of the established VQO as described in the FSP.

A Visual Impact Assessment considerate of the relevant guidelines will be completed and kept on file. The recommendations stemming from the Visual Impact Assessment will be implemented during the operations phases where practical and safe to do so.

Openings within scenic areas will be designed consistent with natural landscape features, with their location shape and scale having regard for visual design principles. Tree Retention Strategies will be undertaken within the design, with their location, shape and scale having regard for visual design principles.

Performance Measure 5.2.

Certified Organizations shall manage the size, shape and placement of clearcut harvests.

> ***Indicator 1:*** *Average size of clearcut harvest areas does not exceed 120 acres (50 hectares), except when necessary to meet regulatory requirements, achieve ecological objectives or respond to forest health emergencies or other natural catastrophes.*

The FSPs contain results / strategies that specify maximum cut-block sizes of 40 ha which may be exceeded in certain situations in accordance with FRPA (i.e. areas where visual rehabilitation is required, or where or forest health conditions or other natural catastrophes require larger sizes).

> ***Indicator 2:*** *Documentation through internal records of clear cut size and the process for calculating average size.*

Cut-block size is tracked within the PhoenixPro forest management system data base and site plans.

Performance Measure 5.3.

Certified Organizations shall adopt a *green-up* requirement or alternative methods that provide for *visual quality*.

> ***Indicator 1:*** *Program implementing the green-up requirement or alternative methods.*

Visual design (design and assessment) incorporates visual green up in the design of proposed cut blocks and roads. The FSPs have specific Results and Strategies that deal with Visual Quality Objectives.

> ***Indicator 2:*** *Harvest area tracking system to demonstrate conformance with the green up requirement or alternative methods.*

Forest inventory information, combined with silvicultural survey data entered into the RESULTS and PhoenixPro tracking systems provide information on adjacency / green-up status. Further, visual impact assessments quantify the existing and proposed non-greened-up areas within a visual assessment unit. The VIA is referenced in specific Site Plans as a supporting document.

Indicator 3: *Trees in clearcut harvest areas are at least 3 years old or 5 feet (1.5 meters) high at the desired level of stocking before adjacent areas are clearcut, or as appropriate to address operational and economic considerations, alternative methods to reach the performance measure are utilized by the Certified Organization.*

Within the Okanagan and Revelstoke TSAs, the minimum height for adjacency/green-up is 2 meters (6.5 feet) and 2.5 (8.2 feet) meters for the Golden TSA unless otherwise specified to manage for other resources. The FSPs are consistent with this requirement.

The FSPs contain results/strategies that facilitate the restoration of visually impacted landscapes to those sites in Zone 1 on the "Visual Management RMZ" map that have been visually impacted by past development. The concept of Visual Rehabilitation through application of visual design principles and harvesting to restore a natural landscape appearance is consistent with the Okanagan Shuswap LRMP Visual Quality Guidelines.

Visual rehabilitation is defined as: In locations where existing logged and/or regenerated openings have existing shapes in the perspective view that have poor design, shape, line, form, and additional harvesting will be planned with principles of visual design to make improvements in the perspective view to the existing visual condition.

Performance Measure 5.4.

Certified Organizations shall support and promote recreational opportunities for the public.

Indicator 1: *Provide recreational opportunities for the public, where consistent with forest management objectives.*

Recreation opportunities are identified within the OSLRMP, RMAC and the KBLUP while specific features such as trails are normally identified through "local knowledge". Regular discussion and cooperation with the many groups that utilize the forest for recreation occurs as part of the standard forest development referral/notification process.

Trail management through groups such as guide-outfitters, snowmobile, horseback, and hiking clubs involves identifying or planning trails in the various operating areas. Discussion between forest licensees and recreation groups regarding trail placement and road maintenance is critical so as to provide recreational opportunities in a safe environment in concert with ongoing forest management activities.

Recreation features are catalogued in GIS format for easy reference by forest planners and operations supervisors. New features are added to the GIS as they become known, either through official notification, or through discovery in the field during layout and development.

Objective Supporting Information and Records
OSLRMP, FSP, SFMP Correspondence
SP's, Operational Plans, Visual Impact Assessments – hard copies kept on file and/or electronically stored.
PhoenixPro, RESULTS

OBJECTIVE 6. PROTECTION OF SPECIAL SITES.

To manage lands that are ecologically, geologically, or *culturally important* in a manner that takes into account their unique qualities.

Performance Measure 6.1.

Certified Organizations shall identify *special sites* and manage them in a manner appropriate for their unique features.

Indicator 1: *Use of information such as existing natural heritage data, expert advice or stakeholder consultation, or consultation with Indigenous Peoples in identifying or selecting special sites for protection.*

Special Sites:

Policies, programs, and plans are contained within FSPs and site level plans. Professional and technical staff involved in site level planning and layout are knowledgeable in applicable laws, regulations, and guidelines regarding management of special sites. EMS awareness training and operational controls assist personnel in identifying special sites as they are encountered in the field.

The Athabasca Heritage Trail in the Golden TSA is considered a 'special site' designated under the Heritage Conservation Act. The David Thompson Heritage trail, located in DTL's operating area, is protected, and managed in accordance with Provincial and Federal legislation and policies and the FSP.

Ecological

Rare ecological communities (sites) are addressed within each Division's Species At Risk Guidebook. Many sites in the Okanagan / Shuswap that are considered ecologically special were included within the Protected Area Strategy and are now parks - e.g., Grasslands Parks in the south Okanagan, and Anstey Hunakwa Park in the Shuswap. There are no rare ecological communities identified within DTL's operating area, however, areas such as Glacier National Park, and Canyon Hot Springs could be considered as "rare" ecological communities.

Cultural

Archaeological Sites: A professional archaeologist conducts an archaeological overview for proposed development (roads and cut blocks) where archaeological potential is considered to be significant. Where deemed appropriate by the archaeologist or one of the First Nations bands during the archaeologist's referral, archaeological impact assessments are conducted in the field.

Archaeological overview mapping (AOA) is available within the operating areas. In specific areas and harvesting proposals, Preliminary Field Reconnaissance (PFR) or

archaeological impact assessments (AIA) are conducted by Professional Archaeologists if required.

Sites predating 1846 are protected from disturbance under the Heritage Conservation Act. For sites that post-date 1846, the archaeologist will recommend protection measures that may be incorporated into operational plans. Examples of sites that have been found include petro glyphs, burial mounds, middens, culturally modified trees, and lithic scatter (i.e. stone tools and chipped stone debris).

Cultural Heritage Resources:

Cultural heritage resources (CHR) will be protected and managed in accordance with the results/strategies for CHR contained in the FSPs. First Nations have on going traditional uses and/or cultural heritage resource interests within the operating areas. Each Band is provided regular (annual) opportunity to review proposed cut block and road locations through FSP information sharing processes, and asked to identify sites that are culturally important. Examples of culturally important sites can include berry-picking, wood or material gathering, spiritual use, or other traditional uses.

Other Cultural Sites:

Historic cabins will be mapped within Site Plans / Logging Plans and protected through site marking, fall-away, skid-away practices.

Geological

Within the operating area, there are no known special geological sites outside of already designated parks / protected areas. Most significant geological features are outside of the normal areas of operation, so are at low risk of impact by forest management activities. Some examples may include large lava caves and interesting rock formations.

If any Special Sites are found, employees and contractors have been directed to stop work and report the feature to the Company representative, who will then contact the appropriate professional or agency to determine mitigation measures before proceeding.

***Indicator 2**: Appropriate mapping, cataloguing, and management of identified special sites.*

GIS layers that identify Special Sites are maintained by each company. The layer will be accessed during development planning and as required.

Objective Supporting Information and Records
FSP, GIS
SP's, Operational Plans – hard copies kept on file and/or electronically stored.
Special ecological sites will be reported to the BC Conservation Data Centre. Protected Archaeological Sites are reported to the Archaeology Branch. All features are tracked on a corporate GIS coverage for future reference.

OBJECTIVE 7. EFFICIENT USE OF FIBER RESOURCES.

To minimize waste and ensure the efficient use of fiber resources.

Performance Measure 7.1.

Certified Organizations shall employ appropriate forest harvesting technology and in-woods manufacturing processes and practices to *minimize* waste and ensure efficient utilization of forest resources where consistent with other *SFI Standard objectives*.

Indicator 1: *Program or monitoring system to ensure efficient utilization, using provisions such as:*

a. *management of harvest residue (e.g. slash, limbs, tops) considers economic, social and environmental factors (e.g. organic and nutrient value to future forests and the potential of increased fuels build-up) and other utilization needs;*

b. *training or incentives to encourage loggers to enhance utilization;*

c. *exploration of markets for underutilized species and low-grade wood and alternative markets (such as bioenergy markets); or*

d. *periodic inspections and reports noting utilization and product separation.*

Forest tenures are governed by the provincial “take or pay” policy, which stipulates that all merchantable timber under Cutting Permit or Road Permit whether it is utilized or not, is billed at the assigned stumpage rate, and charged to AAC, unless it meets the criteria of Section 2.2.2 *Changed Circumstances* of the Interior Appraisal Manual.

Utilization is monitored in accordance with the provincial Waste and Residue Manual, which specifies the utilization standards to be met. Permit documents describe utilization standards to be achieved.

Operational plans specify standards for post harvest conditions that are communicated to the contractor at pre-work meetings, and are monitored during, and after harvesting through the EMS mechanisms.

Harvested areas are surveyed for levels of waste, exclusive of CWD requirements, at the completion of harvest. Any waste in excess of the maximum allowable is charged and tracked through government’s Waste and Billing System.

Wood volume that cannot be manufactured at one of the facilities may be marketed. For example, pulp quality wood may be sold to chipping facilities or directly to pulp producers. Other volumes (such as cedar shake wood or post & rail logs) may be marketed to specialty producers depending on markets and economics.

Investment in improving recovery of finished product from raw logs is an ongoing process at each of the processing facilities. Substantial investment in the Downie and

Gorman operations over the last 15+ years has resulted in very efficient use of the resource. Capital upgrades were planned for the Canoe veneer line back in 2013 to increase the amount and type of logs consumed, while improving the veneer recovery at the same time.

Starting in January 2023, Gorman Group Woodlands set a goal of reduce slash pile burning by **finding alternate uses for 50% of harvest slash piles by the end of 2025.**

This will be accomplished through directing this material to onsite/offsite biofuel producers (i.e., grinding to hog/biofuel), retaining piles where fire risk and hazard is low, and increasing the utilization of non-sawlog fibre at the time of harvest. Actual performance towards the target will be assessed during the annual SFI report submission in the spring of 2024 and 2025.

Objective Supporting Information and Records
Waste and Residue Summary
Log Sale Summaries

OBJECTIVE 8. RECOGNIZE AND RESPECT INDIGENOUS PEOPLES' RIGHTS.

To recognize and respect *Indigenous Peoples'* rights and traditional knowledge.

Performance Measure 8.1.

Certified Organizations shall recognize and respect Indigenous Peoples' rights.

***Indicator 1**: Certified Organizations shall develop and implement a written policy acknowledging a commitment to recognize and respect the rights of Indigenous Peoples. This policy shall provide reference to a program that includes:*

- *a) Use of available resources and information to identify the Indigenous Peoples whose rights may have been affected by the Certified Organization's forest management activities.*
- *b) Recognition of the established framework of legal, customary, and traditional rights as outlined in:*
  - *i. the UN Declaration on the Rights of Indigenous Peoples;*
  - *ii. federal, provincial, and state laws and regulations;*
  - *iii. treaties, agreements or other constructive arrangements among governments and Indigenous Peoples.*
- *c) Appropriate training of personnel and contractors so that the Certified Organization is competent to fulfill their responsibilities under Objective 8 of the Forest Management Standard.*

The Gorman Group's Environmental Policy contains a commitment to recognize Indigenous Peoples' rights and to working with Indigenous communities in the areas where we operate.

***Indicator 2**: The written policy shall be publicly available.*

The Environmental Policy is prominently displayed in each woodlands office and is made available to both employees and contractors. The Policy is freely available as handout at the reception areas of each woodlands office and is posted on each Company's website.

Performance Measure 8.2.

Certified Organizations with forest management responsibilities on public lands shall confer with Indigenous Peoples whose rights may be affected by the Certified Organization's forest management practices.

Indicator 1: *Program that includes communicating with affected Indigenous peoples to enable Program Participants to:*

a) understand and respect traditional forest-related knowledge;

b) identify and protect spiritually, historically, or culturally important sites;

c) address the use of non-timber forest products of value;

d) communicate through processes that respect their representative institutions, using appropriate protocols;

e) provide opportunities to review forest management plans and forest management practices; and

f) respond to inquiries and concerns received.

The process for First Nations communications are contained in the Forest Stewardship Plan for each Company, and in several “Services Agreements” with individual Bands.

Annual notification / referral of forest development activities (harvesting/road construction plans etc.) is provided to affected First Nations Bands for information sharing purposes as specified in the Company-specific FSP.

Several First Nations have entered into Service Agreements with the Gorman Group whereby TUS, CHR and PFR archaeological assessments are conducted on specific cutblocks or proposed road locations.

Where a First Nation expresses an interest or concern as a result of the referral, notification or via the Services Agreements, the interest or concern is addressed through ongoing company-specific communications with the First Nation. This may include:

- alterations to a cutblock boundary, road location,
- postponement or specific timing of harvest,
- further assessment work (e.g., Archaeological Impact Assessments), or
- avoidance of a site.

Archaeological assessments such as preliminary field reconnaissance (PFR) or archaeological impact assessments (AIA) are conducted under the Heritage Conservation Act, will be coordinated with affected First Nations.

Members of the Gorman Group woodlands staff have participated in Cultural Competency training provided by members of the Syilx Nation. A Three day training session was held in November 2023 with an additional session held in June 2024. These sessions helped to provide a pathway forward towards Indigenous Reconciliation and promote a stronger working relationship.

Performance Measure 8.3.

Certified Organizations are encouraged to communicate with and shall respond to Indigenous Peoples whose rights may be affected by forest management practices on the Certified Organization's private lands.

***Indicator 1**: Certified Organizations are aware of traditional forest-related knowledge, such as known cultural heritage sites, the use of wood in traditional buildings and crafts, and flora that may be used in cultural practices for food, ceremonies or medicine.*
***Indicator 2**: Respond to Indigenous Peoples' inquiries and concerns received.*

There are no private lands managed within the scope of the Gorman Group EMS.

OBJECTIVE 9. CLIMATE SMART FORESTRY.

To ensure forest management activities address *climate change adaptation* and *mitigation* strategies.

Performance Measure 9.1.

Certified Organizations shall individually and/or through cooperative efforts involving SFI Implementation Committees or other partners identify and address the climate change risks to forests and forest operations and develop appropriate adaptation objectives and strategies. Strategies are based on best scientific information.

Indicator 1: *Based on best scientific information, Certified Organizations shall identify climate change risks and prioritize them based on the likelihood, nature, severity of their expected impact to their forest lands or forest tenures.*

The Province of BC - through the Ministry of Forests – identifies and prioritizes climate change related risks to the forest resource. These risks are addressed through periodic changes to legislation, regulation and policy that govern all forest management activities on Crown land. The Gorman Group has developed a Climate Change Risk Assessment and Adaptation Strategy for Woodland's Operations climate change mitigation strategies. The Risk Assessment uses likelihood, nature, and severity to assign the following priority rating. Specific Adaptation Strategies for the specific Climate Change Risk are also included.

Climate Change Risk	Priority	Specific Adaptation Strategies
1. Increased Frequency and Intensity of Wildfires	High to Extreme	▪ Conduct fuel mitigation treatments and/or controlled burns to reduce fuel loads and mitigate wildfire risk. ▪ Restore fire-adapted ecosystems to improve resilience. ▪ Locate and schedule harvesting (cutblocks) to create and maintain firebreaks around communities where practicable. ▪ Conduct forest management operations according to fire risk/hazard ratings and monitor worksites to allow for early detection and rapid response.
2. Increase in Drought Frequency & Duration	High	▪ Select drought-tolerant species for reforestation and afforestation. ▪ Prescribe retention silviculture systems to provide shade on low elevation and south facing cutblocks / sites.

Climate Change Risk	Priority	Specific Adaptation Strategies
		▪ Implement adaptive silvicultural practices to promote forest resilience to drought stress (e.g., commercial thinning).
3. Increased Frequency of Extreme Weather Events	High	▪ Ensure remote forest workers are notified in a timely fashion of a forecast or observed storm/ wind event. ▪ In areas prone to windthrow, design cutblocks with wind-resistant boundaries, and preferentially retain deep-rooted tree species as structural diversity. ▪ Ensure infrastructure (roads, bridges, culverts) are designed to withstand extreme weather events.
4. Increase in Pest and Disease Outbreaks	High	▪ Monitor pest and disease populations and their impacts on forest health. ▪ Prioritize forest harvesting to target stands affected by pests/disease early in the outbreak. ▪ Where available, plant pest/disease resistant seedlings (e.g., White Pine). ▪ Promote diverse forest stands to reduce vulnerability to specific pests and diseases.
5. Species not Adapting to Climate Change	High	▪ Promote assisted migration of species to suitable habitats through application of Climate Based Seed Transfer. ▪ Prescribe retention silviculture systems to provide shade on low elevation and south facing cutblocks/sites.
6. Higher Summer Temperatures	Moderate	▪ Schedule physical activities during the coolest parts of the day where practicable. ▪ Educate forest workers in safe work practices for high heat environments.
7. Shifting and Variable Length Seasons	Moderate	▪ Ensure infrastructure (roads, bridges, culverts) are designed to service areas subject to early snowmelt/warming temperatures. ▪ Provide decking opportunities where hauling is restricted by road conditions where practicable. ▪ Move summer harvesting to higher elevations where conditions permit.

The Gorman Group does not manage any non-crown lands for forestry purposes.

The BC Ministry of Forests is strengthening their focus on climate change risks to the forest landscape. A webpage titled "**Preparing For Climate Change**" contains

numerous references to climate science as well as government policy, initiatives and actions to address climate change impacts.

The Ministry of Forests is working to provide better access to climate data and research and is creating policy that will expand the overall Climate Adaptation Policy Framework (CAPF) beyond the 2 current initiatives (Climate Based Seed Transfer and Forest Landscape Planning). The intent is to create / provide robust climate policy that will be flexible to the needs of climate change, while ensuring a high standard of forest management is achieved.

The Gorman Group will continue to monitor and engage with the Province to further the CAPF as it incorporates new policies that will influence our forest management activities.

***Indicator 2**: Certified Organizations shall develop an adaptation plan to address priority climate change risks, via effective implementation of the SFI 2022 Forest Management Standard requirements for potential adaptive management including:*

- *a) periodic updates of forest inventory and recalculation of planned harvests as appropriate to account for changes in growth due to productivity or decreases, including improved data, long-term drought, fertilization, climate change or forest health;*
- *b) access to growth and yield modelling capabilities;*
- *c) documented harvest trends within long-term sustainable levels identified in the forest management plan, and*
- *d) appropriate research, testing, evaluation and deployment of improved planting stock, including varietal seedlings.*

Note: Also Refer to Indicator 1 above (Specific Adaptation Strategies), and Indicator 4 below (WCSIC documentation).

In addition to those “Specific Adaptation Management Strategies” listed under Indicator 1, above, the following measures / management strategies are in place and align with Provincial or Regional strategies or plans.

- *a) periodic updates of forest inventory and recalculation of planned harvests as appropriate to account for changes in growth due to productivity or decreases, including improved data, long-term drought, fertilization, climate change or forest health;*

Forest Inventory for all volume-based tenures is maintained by the Forest Analysis and Inventory Branch (FAIB) of the Ministry of Forests and is updated on a priority basis subject to funding. Both the Okanagan and Revelstoke Timber Supply Areas have had extensive Vegetation Resources Inventory (VRI) updates over the past 15 years. The FAIB performs annual updates that incorporate wildfires and notable forest health occurrences. In addition, Forest Tenure holders are responsible for updating forest

inventory information due to forest management activities (i.e., harvesting and silviculture) on an annual basis through the RESULTS system.

The Gorman Group owns /manages an area-based tenure (Tree Farm Licence 33) and is responsible for maintaining the forest inventory data. Extensive inventory work has been completed and incorporated over the last 20 years. Annual updates of forest management activities are incorporated through the RESULTS system. Significant events that impact forest inventory such as drought, wildfire is noted annually during helicopter overview flights conducted by both the Gorman Group, and the Province. Any significant inventory changes are incorporated in the data preparation of the next timber supply review.

Fertilization of forest stands in areas managed by the Gorman Group is not practiced.

b) Access to growth and yield modeling capabilities;

Growth and Yield modeling information is freely available from the Ministry of Forests. As part of the Climate Adaptation Framework, the Province has established the Climate Based Seed Transfer system for species selection in reforestation – this system facilitates species migration due to climate change, with a focus on fiber productivity over time.

Forest tenures managed by the Gorman Group are part of the lands / management units that have harvest levels based on provincially maintained growth and yield models.

c) Documented harvest trends within long-term sustainable levels identified in the forest management plan, and

Harvest levels are based on Allowable Annual Cuts (AAC) in either the Timber Supply Area or Tree Farm License as determined by BC's Chief Forester. Each License document specifies the AAC for that tenure and is subject to amendment by the Minister of Forests as conditions change over time.

Harvest levels are tracked internally and through the Harvest Billing System before being reconciled annually through the Cut Control Statement issued by the Ministry of Forests (typically in May/June). The Allowable Annual Cut Regulation specifies the rules for managing AAC over time on each license type.

The Gorman Group's Forest Stewardship Plans and this SFMP are consistent with the most current "Timber Supply Area Apportionment" issued by the Chief Forester's office following their Timber Supply Review.

The status of each management unit as of May, 2024 is as follows:

Management Unit	Allowable Annual Cut Status

Okanagan TSA	- Current TSR Determination – 2022 - Apportionment – expected in 2024 - Anticipate a 10-15% reduction in FL A18670 and A18671
Revelstoke TSA	- Current TSR completed in 2011 - Next Analysis Package - in progress – expected late 2024 - Next Apportionment – expected in 2025/2026 - Expect a 20% reduction in AAC on FL A31102 due to Caribou and Old Growth reserves
Golden TSA	- Current TSR completed in 2010 - Next Analysis Package – no dates specified - Expect 10-20% reduction in AAC on FL A17644 due to Caribou and Old Growth reserves
TFL 33	- Current TSR conducted by Gorman Group in 2020 - Determination and AAC finalized in 2021 - Next TSR due in +/- 2030 - Expect 5-10% reduction in AAC on TFL 33 due to Old Growth reserves

d) Appropriate research, testing, evaluation, and deployment of improved planting stock, including varietal seedlings.

Science-based seed transfer is the foundation for effective reforestation and genetic adaptation of stock planted. It's part of B.C.'s sustainable forest management system. The Gorman Group's reforestation program is fully compliant with the Chief Foresters Standards for Seed Use:

See: https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/tree-seed/legislation-standards/chief-forester-s-standards-for-seed-use

Specific to the BC Climate Adaptation Policy Framework, the Province has established the Climate Based Seed Transfer system for species selection in reforestation.

Climate Based Seed Transfer (CBST) is an important climate change adaptation strategy to promote healthy, resilient and productive forests and ecosystems through the matching of seedlings/seedlots to future (projected) planting site climates. This system facilitates longer-term species migration due to climate change, while maintaining a focus on fiber productivity and ecosystem health over time.

The Climate-Based Seed Transfer (CBST) project falls within the 'Resilience' component of the Climate-Based Genetic Resource Management initiative. It's led by the Forest Improvement and Research Management Branch and the Forest Genetics Council of British Columbia.

Indicator 3: *Certified Organizations shall document how their adaptation plan objectives and strategies fit within broader regional climate adaptation strategies and plans, where they exist.*

Note: Also refer to Indicator 1 and 2 above and Indicator 4 below.

At present, the Ministry of Forests has 2 climate adaptation strategies identified:

1) The Climate Based Seed Transfer guidelines (referenced above), and
2) The Forest Landscape Planning Framework

The CBST is used extensively in the Gorman Group, while there are no active FLP initiatives in our operating areas.

In addition to these 2 strategies, the Old Growth Strategic Review can be considered as a positive step in addressing climate change. Similarly, the efforts around wildfire risk/reduction and fuel mitigation, combined with the increased emphasis on cultural burning/prescribed fire will have positive impacts on unplanned carbon releases due to wildfire.

The Gorman Group is working with both the Province and Indigenous Communities to incorporate these actions/strategies into our forest management framework through direct action/involvement, or participation as observers in government to government processes.

On a broader basis, the Province has developed the BC Climate Preparedness and Adaptation Strategy,

See: https://www2.gov.bc.ca/gov/content/environment/climate-change/adaptation/cpas#species

The Auditor General reported on the Provinces' progress in addressing climate change in 2018 and found that BC needs to do more to prepare for climate change.

See:http://www.llbc.leg.bc.ca/public/pubdocs/bcdocs2018/684190/climate_change_final_0.pdf

A considerable effort is underway to make progress on several of the recommendations in the report, including a concerted effort by the Ministry of Forests to create a policy framework to address climate adaptation. Expect more formal policy announcements in 2024/2025.

Indicator 4: *Certified Organizations shall report annually to SFI Inc. their progress towards achieving climate change adaptation strategies and plans.*

WCSIC has developed a Climate Smart resources summary that is posted to the WCSIC Members section of the website. It includes a summary of some common best management practices related to climate smart forestry that can be utilized to support the development of adaptive management plans and assist Certified Organizations in

their annual reporting to SFI Inc. In addition, the Annual Report submitted to SFI will contain the requested information.

Performance Measure 9.2.

Certified Organizations shall individually and/or through cooperative efforts involving SFI Implementation Committees or other partners identify and address opportunities to mitigate the effects associated with its forest operations on climate change.

***Indicator 1**: Based on best scientific information, Certified Organizations shall identify and address opportunities to enhance the climate benefits associated with forest management operations on the forests they own or manage via effective implementation of the SFI 2022 Forest Management Standard requirements such as:*

a) *Objective 2 – Forest Health and Productivity; Objective 10 – Fire Smart Forestry; and/or other silvicultural or operational practices to enhance the climate benefits associated with their forest operations.*

Note: Refer to Indicator 2 below.

***Indicator 2**: Based on best scientific information, Certified Organizations shall identify and address opportunities to enhance ecosystem resilience for the forests they own or manage via effective implementation of the SFI 2022 Forest Management Standard requirements including:*

a) *Prompt reforestation or planned natural reforestation as per Indicator 2.2.1;*
b) *Adequate regeneration and appropriate actions to correct understocked areas, and*
c) *Evaluation for afforestation of areas that are not ecologically important, and*
d) *Protection of desirable or planned advanced regeneration during harvest and the retention of vigorous trees during partial harvest.*

Section 44(1) of the Forest Planning and Practices Regulation (FPPR) applies to all areas harvested under the Gorman Group's FSPs except where exempted from the requirements of Section 29(1) or (2) of the Forest and Range Practices Act. Where operationally feasible, previously harvested areas are reforested within a 24 month period following harvest completion. The Chief Forester's Climate Based Seed Transfer Guidelines are followed during all reforestation activities. Activity scheduling (i.e. silviculture surveys) within Phoenix Connect ensures regeneration obligations will / can be met and that any understocked areas are identified early to ensure appropriate actions are taken to meet free growing obligations.

No afforestation activities are included in the scope of the Gorman Group licences or this SFMP.

WCSIC has developed a Climate Smart resources summary that is posted to the WCSIC Members section of the website. It includes a summary of best management practices related to climate smart forestry that can be utilized to support the development of adaptive management plans.

Indicator 3: *Based on best scientific information, Certified Organizations shall develop a program to identify and address greenhouse gas emissions within their operational control.*

Few options are available for limiting greenhouse has emissions in forestry operations at this time. Gorman's will monitor developments in reductions of greenhouse gases in the forest management and transportation sectors through media, membership in WCSIC, COFI, BC Forest Safety Council and other organizations. Some examples of ways we are trying to limit greenhouse gas emissions within our forestry operations are as follows:

- Continuing to stay informed on any new engine technology developments (i.e., electric and/or hybrid equipment),
- Encouraging contractors to have an *automatic idle engine shut-off* installed on equipment to minimize fuel consumption during periods of inactivity, and
- Encouraging contractors to ensure their equipment is properly maintained to minimize fuel consumption.

Starting in January 2023, Gorman Group Woodlands set a goal of reduce slash pile burning by finding alternate uses for 50% of harvest slash piles by the end of 2025.

This will be accomplished through directing this material to onsite/offsite biofuel producers (i.e., grinding to hog/biofuel), retaining piles where fire risk and hazard is low, and increasing the utilization of non-sawlog fibre at the time of harvest. Actual performance towards the target will be assessed during the annual SFI report submission in the spring of 2024 and 2025.

Indicator 4: *Certified Organizations shall report annually to SFI Inc. their measures to mitigate climate change associated with forest operations.*

Starting in January 2023, Gorman Group Woodlands set a goal of reduce slash pile burning by finding alternate uses for 50% of harvest slash piles by the end of 2025. Actual performance towards the target will be assessed during the annual SFI report submission in the spring of 2024 and 2025.

The Gorman Group will continue to work with the WCSIC to participate in any provincial measures and/or strategies to mitigate climate change associated with forest operations.

Objective Supporting Information and Records
Gorman Group Draft Climate Change Risk Assessment Document

OBJECTIVE 10. FIRE RESILIENCE AND AWARENESS.

To limit susceptibility of forests to undesirable impacts of wildfire and to raise community awareness of fire benefits, risks, and minimization measures.

Performance Measure 10.1.

On the forests they own or manage, Certified Organizations shall limit susceptibility to undesirable impacts of wildfire, promote healthy and resilient forest conditions through management techniques, actions and/or policies, and support restoration of forests following wildfire damage.

Indicator 1: *Program to evaluate the risk of undesirable impacts of wildfire and the role of fire on the forests they own or manage.*

The Gorman Group has previously created a Fire Hazard Assessment Procedure to comply with the requirements of Section 7 of the Wildfire Act. As per Wildfire Regulation 11(3.1(b)), the prescribed interval for Fire Hazard Assessment is 6-months after the completion of harvest. The time frame will be extended for CP-Blocks that are still snow covered at the end of the 6-month period for 2 months that the CP-Blocks are snow free.

Each Division has prepared both a Fire Preparedness Plan and a Fire Watch Journal for use by contractors during the fire season. As part of our commitment, the Gorman Group requires that all operators working on our Forest Licence areas are trained in prevention, detection, suppression, and are compliant with all regulations of the Wildfire Act.

Indicator 2: *Use stand and landscape level management techniques, actions and/or policies to promote forest health and resilience, and to mitigate the likelihood of undesirable impacts of wildfire, such as, prescribed fire, cultural burning, thinning, or hazardous fuel reduction where appropriate based on risk.*

Fire Hazard Assessments are carried out on our previously harvested CP-Blocks as described in Indicator 1 above.

Starting in January 2023, Gorman Group Woodlands has set a goal of reduce slash pile burning by finding alternate uses for 50% of harvest slash piles by the end of 2025.

Gorman Bros. Lumber Ltd. has previously worked with both the ONA and PIB, within selected areas within the NDT4 management regime, to conduct fuel modification treatments to reduce the risk of wildfire. Final prescriptions and operations were carried out with both input and direction from First Nations Band members. Currently, Gorman Bros. Lumber Ltd. is working with the ONA and PIB to secure FES funding for a fuel

mitigation treatment project (B6-26A) in the Darke Lake area west of Summerland, BC. Operational treatment of the area is planned for late fall 2023.

Blackwell and Associates Ltd. are currently completing a fire hazard/risk mapping project that will help us make better forest management decisions and direct resources (i.e., thinning, harvesting, etc.,) to the most at-risk/susceptible areas. We anticipate using this information to guide our operations where it makes operational and economic sense to do so.

Indicator 3: *Use of management techniques to address wildfire damage, mitigate negative impacts of water and soils, and to promote forest restoration and future forest resilience.*

Where operationally feasible, both prompt harvesting and reforestation of burned salvage areas occurs. This includes rehabilitation/deactivation of access structures that could contribute to potential sedimentation/erosion issues.

The Gorman Group is an advocate of mixed species reforestation techniques where it makes sense ecologically to help promote resilient future forests. This includes looking for opportunities to recognize broadleaved species around wetlands, moisture receiving sites, etc.

Performance Measure 10.2.

Certified Organizations shall individually and/or through cooperative efforts involving government agencies, SFI Implementation Committees, Project Learning Tree, or other partners, engage in efforts to raise awareness of and take action towards benefits of fire management and minimization of undesirable impacts of wildfire.

Indicator 1: *Participation in, or support of, local, state, provincial, federal, or Indigenous fire management and prevention programs.*

Note: Refer to Indicator 2 below.

Indicator 2: *Participation in, or support of, programs to promote benefits of fire management, and raise awareness about the environment, economic, and social risks of undesirable impacts of wildfire to values such as carbon emissions, water quality and quantity, air quality, species habitat, public safety, and human health.*

WCSIC has posted Fire Smart resources on the WCSIS website (Links page).

WCSIC is also working collaboratively with the Tree Frog News (and other interested parties) to develop an Annual Fire Smart Campaign that will begin during Spring 2023, as part of the Tree Frog News publications.

The Gorman Group has been a long time participant of the Okanagan Basin Water Board's Stewardship Council. Most recently, the Gorman Group has been working with the ONA Tier 3 Forestry Working Group to help develop riparian best management practices for use during forest harvesting operations.

Within the southern portion of our operating area, Gorman Bros. Lumber Ltd. is actively involved with the South Okanagan Wildlife Advisory Group (SOWAG). The group is a mix of industry representatives, Government (Provincial, Regional Districts and Municipalities) and the BC Wildfire Service.

Objective Supporting Information and Records
Available at Divisional offices

OBJECTIVE 11. LEGAL AND REGULATORY COMPLIANCE.

To comply with all applicable laws and regulations including international, federal, provincial, state and local.

Performance Measure 11.1.

Certified Organizations shall comply with applicable federal, provincial, state, and local forestry and environmental laws and regulations.

Indicator 1: *Access to relevant laws and regulations in appropriate locations.*

The EMS manual provides guidance on how access legal and other requirements applicable to forest management are to be accessed, as well as how these requirements are provided to personnel (see Legal and Other Requirements section). Subscriptions to 'QuickScribe Online' at www.quickscribe.bc.ca/login.php provide access to all federal and provincial legislation, as well as a multitude of government policy manuals and other guidance.

Ad hoc correspondence from COFI, the ILMA and other industry associations provides summaries and interpretations of recently enacted forestry-related legislation.

Indicator 2: *System to achieve compliance with applicable federal, provincial, state, or local laws and regulations.*

The EMS Manual provides a framework for environmental monitoring (see Monitoring and Measuring Section). It also describes the requirements and procedures for tracking and addressing any non-conformances with the EMS, as well as any non-compliances with federal or provincial legislation.

Staff and contractor EMS training is an annual requirement and is revised in response to changes in regulatory revisions, changes to the SFI Standard, or other relevant policies/practices (see Training and Awareness section).

Indicator 3: *Demonstration of commitment to legal compliance through available regulatory action information*.

The Audit Program (both internal and external audits) outlined in the EMS provides an independent assessment of legal compliance at the operations level. The MOF Annual Compliance Report lists non-compliances identified or tracked by the Compliance and Enforcement Program. Records of all MOF inspections are retained at the respective Woodlands Office.

Performance Measure 11.2.

Certified Organizations shall comply with all applicable social laws at the federal, provincial, state and local levels in the country in which the Certified Organization operates.

Indicator 1: *Written policy demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, gender equality, diversity inclusion, anti-discrimination and anti-harassment measures, workers' compensation, Indigenous Peoples' rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety.*

Refer to Indicator 2, below.

Indicator 2: *Forestry enterprises will respect the rights of workers and labour representatives in a manner that encompasses the intent of the International Labour Organization (ILO) core conventions.*

Company hiring policies in conjunction with the *Environmental Policy* commit to complying with social laws, such as those covering civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation, Indigenous peoples' rights, workers' and communities' right to know, prevailing wages, and occupational health and safety and respects the rights of workers and labour representatives.

Employees at the Canoe veneer plant and plywood operation are subject to a collective labour agreement with the United Steelworkers union.

Contracts contain a provision that commits contractors to adhere to the Employment Standards Act.

Objective Supporting Information and Records
EMS
Environmental Policy, Occupational Health, and Safety Program

OBJECTIVE 12. FORESTRY RESEARCH, SCIENCE, AND TECHNOLOGY.

To invest in research, science, and technology, upon which sustainable forest management decisions are based.

Performance Measure 12.1.

Certified Organizations shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners provide in-kind support or funding for forest research to improve sustainable management of forest resources, and the environmental benefits and performance of forest products.

Indicator 1: *Financial or in-kind support of research, collaboratives, or knowledge transfer to address key themes of relevance in the region of operations as identified by Certified Organizations, local stakeholders, communities and/or Indigenous Peoples. Examples could include, but are not limited to, the following topics:*

a) *climate change adaptation and mitigation;*
b) *water quality and quantity;*
c) *biodiversity, Forests with Exceptional Conservation Value, and species maintenance and recovery;*
d) *landscape ecology;*
e) *Indigenous traditional forest-related knowledge;*
f) *Ecosystem services or non-timber forest products;*
g) *community engagement;*
h) *forest health and productivity;*
i) *support for Forest Inventory Analysis (FIA);*
j) *SFI sponsored conservation research;*
k) *the role of forests in the bioeconomy;*
l) *or similar themes which build broader understanding of the benefits and effects of sustainable forest management or sustainable supply chains.*

WCSIC - Western Canada SFI Implementation Committee

Okanagan-Shuswap Forest District Steering Committee

South Okanagan Wildfire Advisory Group

Okanagan Basin Water Board – Water Stewardship Committee

OSLRMP Implementation and Monitoring Committee

OASISS – Okanagan and Similkameen Invasive Species Society

Peachland Watershed Technical Advisory Committee

COFI - Council of Forest Industries

District of Salmon Arm Environmental Management Committee

Selkirk Forest District (Columbia Zone) TSA Steering Committee

CMI member- Columbia Mountains Research Institute

RFWS member- Revelstoke Forest Worker Society

LINKS member – A local Revelstoke committee that links wildlife researchers together with foresters & other stakeholders

In previous years, various projects were supported through cash or in-kind contributions, as well Forest Investment Account Program (FIA) funding to support forest health, productivity, management of forest resources and other interests.

In previous years, cash and in-kind funding was provided to Dr. Thomas Sullivan to continue his work in understanding the interaction of various forest management practices on small mammal populations. Dr. Sullivan's work in this field over the past 30 years has been instrumental in advancing the knowledge base in this area and has led to revolutionary changes in coarse woody debris, standing tree retention, and riparian management techniques.

GBL is currently working in cooperation with Dr. Thomas P. Sullivan of the Applied Mammal Research Institute where Dr. Sullivan in studying the *Enhancement of Winter Range Habitat for Mule Deer in Douglas-fir Forests*. Harvest treatments consist of areas undergoing single tree selection, group selection, patch cuts of a variety of sizes and unharvested control sites at the field level. The overall goal of the project is to measure changes in mule deer habitat in at least five post harvest years. DTL is a multi-year sponsor of the Caribou Maternal Pen in Nakusp aimed at increasing survival of caribou calves during their most susceptible stage of life.

DTL is currently working with the Caribou Recovery Group led by Dr. Rob Serrouya to promote understanding and operational measures aimed at sustaining and increasing caribou populations in the North Columbia.

DTL will also be providing some transportation to install a section of test fencing for the Kirbybille Caribou Maternity pen relocation over the summer of 2023.

Indicator 2: *Ensure that knowledge gained through research is shared, to the extent possible, to positively influence sustainable forest management.*

WCSIC supports various research projects and shares reports and information with members via the WCSIC website (members section) where these are made available. Refer also to the projects section of the WCSIC website for current projects.

Both DTL and CFP have been involved in various Land Use Plans that involve Caribou management as well as financial in-kind support of various Caribou programs including caribou monitoring, caribou pen construction and operation and other initiatives. DTL is continuing to provide ongoing financial support towards the caribou pen construction project managed by the Arrow Lakes Caribou Society.

Both the Gorman Group and WCSIC also provide support to the Tree Frog News that communicates forestry related news daily, that at times, includes research and technology announcements and information.

Performance Measure 12.2.

Certified Organizations shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners develop, contribute to, or use national, state, provincial or regional analyses in support of their *sustainable forestry programs*.

Indicator 1: *Participation, individually or through cooperative efforts involving SFI Implementation Committees and/or associations at the national, state, provincial, or regional level, in the development of information such as:*

a. *regeneration assessments;*
b. *growth-and-drain assessments;*
c. *best Management Practices implementation and conformance;*
d. *biodiversity conservation information for family forest owners;*
e. *social, cultural or economic benefit assessments; and*
f. *landscape-scale biodiversity assessments which clarify the contributory role of sustainable forest management.*

Company efforts, and associated efforts with the WCSIC and other organizations, ensure that monitoring information is considered for incorporation into the development and use of regional analyses including:

- TSA level TSR input and review including Growth and Yield parameters, Productivity, Site Indices and Vegetative Resource Inventories,
- Site Index Adjustments (SIA) and Change Monitoring Inventory Program for TFL 33,
- BMP implementation and compliance using Objectives established through the Land Use Plans and incorporated in the FSPs,

- Wildlife monitoring programs through LINKS (Caribou) and other programs (Deer, Marten, Caribou, Wolves),
- Promoting Biodiversity Conservation through the Wood Producer Information Packages,
- Investing in and maintaining social licence through having an “open door policy” with respect to forest planning, operations and management practices.

Objective Supporting Information and Records
TFL 33 FIA Program Projects
OIFS (IFPA) FIA Projects, Wood Purchaser Information Package
Climate change related websites listed for performance measures 9.1 and 9.2

OBJECTIVE 13. TRAINING AND EDUCATION.

To improve the implementation of *sustainable forestry* practices through appropriate training and education *programs.*

Performance Measure 13.1.

Certified Organizations shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the *SFI 2022 Forest Management Standard.*

Indicator 1: *Written statement of commitment to the SFI 2022 Forest Management Standard communicated throughout the organization, particularly to facility and woodland managers, and field foresters.*

The Environmental Policy shall be communicated to all Woodlands employees and contractors who shall conduct activities within the direction and intent of the Policy. The policy is posted in each office and on company websites.

The commitment to the SFI Standard is stated within this SFMP. This commitment is also circulated as part of the SFI training / awareness sessions conducted with staff and contractors.

Silviculture, road, harvesting, and other contracts contain a provision that the contractor will perform the work in accordance with the EMS and the requirements of the SFI. Furthermore, the contract requires the contractor to follow all Standard Operating Procedures and Best Management Practices pertinent to their role or activity.

Indicator 2: *Assignment and understanding of roles and responsibilities for achieving SFI 2022 Forest Management Standard objectives.*

Roles and responsibilities for achieving the SFI objectives and the EMS are defined in the Structure and Responsibility Section of the EMS manual.

Indicator 3: *Staff education and training sufficient to their roles and responsibilities.*

The EMS manual describes methods put in place to ensure that staff has the required education, training, awareness, and competency to perform their job. These methods are consistent with the WCSIC Training Policy.

Indicator 4: *Contractor education and training sufficient to their roles and responsibilities.*

Contractors that have the potential to significantly impact the environment are required to have EMS awareness training, to comply with SFI standards, and adhere to EMS requirements (*i.e.*, SOP's, Fire Preparedness, Spill Response, etc.).

EMS training includes the SFI Objectives and the commitment to achieve those Objectives. All Contractor training events are documented, and records are maintained at each Woodlands office.

Contractors are responsible for training their employees for SFI/EMS requirements and must make staff training documentation available on request.

Indicator 5: *Certified Organizations shall have written agreements for the use of qualified logging professionals, or wood producers that have completed training programs and are recognized as qualified logging professionals and/or certified logging companies.*

All contractors are assessed for competency prior to initiating any forest management or related activity. Past performance, personal references, and other relevant information is considered when assessing / determining if a contractor can be considered a "qualified logging professionals".

Competency of contractors regarding the Environmental Policy and the SFI standard will be measured by completing annual training sessions and understanding the EMS.

Contractor competency regarding the Environmental Policy and procedures will also be evaluated through operational inspections and emergency response drills.

Performance Measure 13.2.

Certified Organizations shall work individually and/or through cooperative efforts involving SFI Implementation Committees, logging or forestry associations, or appropriate agencies or others in the forestry community to foster improvement in the professionalism of wood producers specific to qualified logging professionals.

Indicators 1: *Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer core training courses that allow individuals to attain qualified logging professional status. These criteria shall address at least the following:*

a. *awareness of sustainable forestry principles and SFI's work across four pillars: standards, conservation, community and education;*
b. *best Management Practices, including streamside management and road construction, maintenance, and retirement;*
c. *awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, Forests with Exceptional Conservation Value (critically imperiled and imperiled species and ecological communities), and other measures to protect biodiversity and wildlife habitat;*
d. *logging safety;*
e. *U.S. Occupational Safety and Health Administration (OSHA) and Canadian Centre for Occupational Health and Safety (CCOHS) regulations, wage and hour rules, and other provincial, state and local employment laws; and*
f. *other topics identified by Certified Organizations and/or SFI Implementation Committees that improve their responsibilities in meeting the SFI 2022 Standards.*

Membership on the Western Canada SFI Implementation Committee (WCSIC) provides the opportunity to promote, among other things: legal requirements, training, BMP's including streamside management and road construction, maintenance, and retirement (deactivation); reforestation, forest resource conservation, aesthetics and special sites; awareness of responsibilities under the Canadian Species at Risk Act, and other measures to protect wildlife habitat; logging safety; Occupational Safety and Health Regulations, transportation issues; business management; and public policy and outreach and awareness of emerging technologies.

The WCSIC is active in promoting the principles of SFM through advertising in journals and relevant periodicals, as well as providing outreach / extension materials for small woodlands owners/operators on the WCSIC website. The Wood Producers Information Package was also developed by the WCSIC.

General EMS Training at the company level covers both EMS and SFI requirements. The Training Package delivered to staff and provided to contractors includes information on BMPs (Environmental Field Procedures, or Standard Operating Procedures) as well as guidance for Species at Risk and Invasive Plants. The Wood Producers Information Package also contains the same relevant information.

OH&S, WorkSafeBC, and Employment Standards are part of the contractors' safety responsibilities and are specified in harvesting, silviculture, and road contracts. Woodlands staff participate in local roads/logging safety committees which provides a

mechanism for relaying and/or receiving safety information, hazards, and preventative measures for consideration / implementation.

Consistent with the WCSIC Training Policy, the GGOC will provide applicable training as indicated in the policy. Where applicable, an annual review of the training will be carried out. New material or course work deemed relevant to the implementation of this program will be incorporated.

Indicator 2: *Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer containing education training courses that shall be taken by qualified logging professionals at least once every two years to maintain their status. The continuing education training course(s) shall address one or more of the following topics:*

- *a. awareness of sustainable forestry principles and SFI's work across four pillars: standards, conservation, community, and education;*
- *b. best management practices, including streamside management and road construction, maintenance, and retirement;*
- *c. reforestation, invasive species management, forest resource conservation, aesthetics and special sites;*
- *d. awareness of rare forested natural communities as identified by provincial or state agencies, or by credible organizations such as NatureServe and The Nature Conservancy;*
- *e. transportation issues;*
- *f. business management;*
- *g. public policy and outreach;*
- *h. awareness of emerging technologies;*
- *i. logging safety; or*
- *j. other topics identified by Certified Organization and/or SFI Implementation Committees that improve their responsibilities in meeting the SFI 2022 Standards.*

The General Awareness Training covers both EMS and SFI. Included in the package are BMP's (Environmental Field Procedures) as well as guidance for threatened & endangered species, culturally important sites, and invasive plants.

Membership in WCSIC is current, and participation in the establishing of criteria for recognition of logger certification programs is ongoing. Additional information is contained in The Wood Producer Information Package.

Only logging contractors and road builders that are *"Safe Certified"* by the BC Forest Safety Council are utilized for forest management activities on licensed tenures.

Objective Supporting Information and Records
EMS and supporting documentation
WCSIC Wood Producer Information Packages
WCSIC Training Policy
Western Canada SFI Implementation Committee website http://www.wcsic.ca

OBJECTIVE 14. COMMUNITY INVOLVEMENT AND LANDOWNER OUTREACH.

To broaden the practice of *sustainable forestry through* public outreach, education and involvement, and to support the efforts of SFI Implementation Committees.

Performance Measure 14.1.

Certified Organizations shall support and promote efforts by consulting foresters, state, provincial and federal agencies, state or local groups, professional societies, *conservation* organizations, Indigenous peoples and governments, community groups, sporting organizations, labour, universities, extension agencies, the *American Tree Farm System*® and/or other landowner cooperative programs to apply *principles* of sustainable forest management.

Indicator 1: *Support, including financial, for efforts of SFI Implementation committees.*

Efforts of the SFI Implementation committees are supported through current membership in the WCSIC. Fees are paid annually based on the size of the certified area and/or flat rate for Fiber Sourcing.

Members may also provide in-kind support through Executive and Sub-Committee participation and volunteering for specific events or assistance as noted in the meeting minutes.

Indicator 2: *Support individually and/or through cooperative efforts involving SFI Implementation Committees, education and outreach to forest landowners describing the importance and providing implementation guidance on:*

a) Best Management Practices;

b) Reforestation and afforestation;

c) Visual quality management;

d) Conservation objectives, such as critical wildlife habitat elements, biodiversity, threatened and endangered species, and Forests with Exceptional Conservation Value;

e) Management of harvest residue (e.g., slash, limbs, tops) considers economic, social, environmental factors (e.g., organic and nutrient value to future forest) and other utilization needs;

f) Control of invasive species;

g) Characteristics of special sites;

h) Reduction of wildfire risk;

i) Use of qualified logging professionals, qualified resource professionals and/or certified logging companies;

j) Awareness of SFI, and

k) Reporting of inconsistent practices.

The Wood Producer Information package is provided to private landowners during procurement operations with reference to Company websites for further information.

WCSIC maintains a website that contains information related to sustainable forest management, best management, inconsistent practices, etc.

WCSIC also has an informational brochure that is available on the website that contains information on sustainable forest management, SFI and the WCSIC.

WCSIC is currently in the process of developing a social media policy, that includes creation of social media accounts and routine social media communications to promote SFI, sustainable forest management and the WCSIC.

Refer also to Performance Measure 10.2 (Fire Smart Forestry) for additional information on reduction of wildfire risk.

Indicator 3: *Participation in efforts to support or promote conservation of managed forest through voluntary market-based incentive programs such as current-use*

taxation programs, Forest Legacy Program, conservation easements, federal, state, or provincial cost share programs, or SFI Conservation Grants.

Each company (in conjunction with government and local stakeholders) has been closely involved with Land Use Planning processes over the past 25+ years (i.e. RMAC, KBLUP, OSLRMP). Participation in future regional conservation planning and priority-setting efforts such as higher level plans, GAR orders, etc. is necessary to ensure that issues affecting operating areas are fully and properly addressed.

Communications with local and provincial government occurs on a regular basis to ensure that new and emerging issues are known, considered, and incorporated into our planning processes.

All Woodlands activities are conducted under the supervision of Registered Professional Foresters who belong to the Association of BC Forest Professionals.

GBL/CFP: GBL and CFP have adopted the OSLRMP as the basis of forest management activities. The OSLRMP is a consensus land-use plan that provides the foundation for integrated resource management in the Okanagan TSA. These values include a variety of resource uses and biodiversity including OGMA's, wildlife management, water, etc.

DTL: The Results and Strategies in the FSP balance forest resource values such as OGMA's, riparian reserve zones, WTRA's and caribou reserves.

DTL has committed not to operate in the Greeley creek watershed area which is the city of Revelstoke's primary water supply source.

Performance Measure 14.2.

Certified Organizations shall individually and/or through cooperative efforts involving SFI Implementation Committees, support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education and involvement related to sustainable forest management.

Indicator 1: *Periodic educational opportunities promoting sustainable forestry, such as*

a. *field tours, seminars, websites, webinars or workshops;*
b. *educational trips;*
c. *self-guided forest management trails;*
d. *publication of articles, educational pamphlets or newsletters;*
e. *support for national, state, provincial, and local forestry organizations and soil and water conservation districts.*
f. *engagement and support of teachers and/or students through programs such as Project Learning Tree.*

The efforts of the WCSIC are supported through maintaining current membership.

Educational opportunities are supported through providing tours and classroom visits – e.g., tours of woodland operations for Vancouver Island University and local high school forestry students; mill / woodlands tour for the FPAC sponsored Australia VIP tour.

Company websites contain links and information about sustainable forest management.

Working relationships with various local stakeholder groups are integral to the discussion around sustainable forest management. For example:

- discussions with the Crowfoot Snowmobile Club and Larch Hills Cross Country Ski Club occur on a regular basis in order to ensure recreational activities are considered and accounted for during forest development.
- Support for the Forest Worker's Society helps to promote the concept of sustainable forest management along with hosting the annual Revelstoke logger sports event.
- Participation with Okanagan and Similkameen Invasive Species Society (OASISS), and membership of the Okanagan Similkameen Parks Society (OSPS) generates opportunities to discuss sustainable forest management.
- Partnership and support for research programs (e.g., Dr. Tom Sullivan) create synergies with extension and outreach efforts (presentations, kiosks, brochures, etc.).

Refer to Performance Measure 10.2 and Performance Measure 14.1 (Indicator 2) for information regarding the WCSIC website, Tree Frog News and potential new Social Media Accounts and Campaigns.

Performance Measure 14.3.

Certified Organizations shall, individually and/or through cooperative efforts including SFI Implementation Committees, establish, at the state, provincial, or other appropriate

levels, procedures to address concerns raised by loggers, consulting foresters, employees, unions, *stakeholders*, the public or other *Certified Organizations* regarding management that appears inconsistent with the *SFI Standards principles* and *objectives*.

Indicator 1: *Support for SFI Implementation Committees (e.g. toll-free numbers and other efforts) to address concerns about apparent nonconformance.*

Gormans, Downie, and Canoe are represented by a single membership in the WCSIC. The WCSIC website (http://www.wcsic.ca) provides contact information for the public or stakeholders who suspect non-conforming practices by a WCSIC member and who wish to make a complaint. The WCSIC procedure for addressing allegations of SFI program non-conformance is posted on their website.

Indicator 2: *Process to receive and respond to public inquiries. SFI Implementation Committees shall submit data annually to SFI Inc. regarding concerns received and responses.*

The EMS provides a mechanism for addressing public inquiries about sustainable forest management. Public concerns or questions regarding forestry operations are vetted through the Woods Manager or designate at each office. Records of any discussions are kept in accordance with EMS procedures and are reviewed at the Annual Management Review Meeting. Copies of complaints received are forwarded to WCSIC and reviewed with the surveillance/registration auditing company. WCSIC also completes an annual survey to SFI that contains a summary of submitted complaints.

Our “open door” policy allows the public to speak directly to staff at any time during the forest management cycle. Staff will address or record any concerns and follow up with a written response in accordance with EMS procedures.

The public can also submit comments and concerns through linkages posted on the Company websites.

If the program participant has received in writing and in sufficient detail a specific claim of non-conformity by a complainant, the program participant shall, ***within 45 days*** *of the complaint, respond to the complainant and forward a copy of the complaint and its response to the registrar for future review via the surveillance or certification audits.*

Objective Supporting Information and Records
Public Correspondence Records, Annual Audits

OBJECTIVE 15: PUBLIC LAND MANAGEMENT RESPONSIBILITIES.

To participate and implement sustainable forest management on *public lands*.

Performance Measure 15.1.

Certified Organizations with forest management responsibilities on public lands shall participate in the development of public land planning and management processes.

Indicator 1: *Involvement in public land planning and management activities with appropriate governmental entities and the public.*

Participation in relevant land use planning processes and implementation committees such as the OSLRMP, RMAC, and KBHLP plans is ongoing. Updates / amendments to these plans occur on an as-needed basis – *e.g.*, the recent Ungulate Winter Range and Caribou GAR Orders and amendments to the RHLPO.

Annual updates to the FSPs are referred to stakeholders, the public, and other groups to provide the opportunity to comment on the location / scale / extent of planned forest management activities.

Participation in the province's newly created Old Growth Strategic Review process, Watershed Security Strategy, Cumulative Effects Monitoring and Forest Landscape Planning process will be ongoing with updates / amendments to this document completed as required.

Indicator 2: *Appropriate contact with local stakeholders over forest management issues through state, provincial, federal or independent collaboration.*

The FSPs are available to local interest groups, agencies and the public during review and comment periods, as well as on Company websites. Specific Site Plans are available for review upon request.

Joint forums with government, industry and stakeholders occur on an *ad hoc* basis throughout the year, and are typically focused on a specific development, watershed issue, or recreational feature.

Special applications are advertised in local newspapers to notify local stakeholders and interested persons the opportunity to provide comment. The "open door" policy at each Woodlands office provides opportunity for the public to speak directly to forestry staff concerning forest management issues.

Objective Supporting Information and Records
FSP, Public Correspondence Records, OIFS

OBJECTIVE 16. COMMUNICATIONS AND PUBLIC REPORTING.

To increase transparency and to annually report on conformance with the SFI Forest Management Standard.

Performance Measure 16.1.

A *Certified Organization* shall provide a summary audit report, prepared by the *certification body*, to *SFI Inc.* after the successful completion of a certification, recertification or surveillance audit to the *SFI 2022 Forest Management Standard.*

Indicator 1: *The summary audit report submitted by the Certified Organization (one copy must be in English) shall include, at a minimum,*

a. *a description of the audit process, objectives and scope;*
b. *a description of substitute indicators, if any, used in the audit and a rationale for each;*
c. *the name of the Certified Organization that was audited, including its SFI representative;*
d. *a general description of the Certified Organization's forestland included in the audit;*
e. *the name of the certification body and lead auditor (names of the audit team members, including technical experts may be included at the discretion of the audit team and Certified Organization);*
f. *the dates the audit was conducted and completed;*
g. *a summary of the findings, including general descriptions of evidence of conformity and any non-conformities and corrective action plans to address them, opportunities for improvement, and exceptional management; and*
h. *the certification decision.*

Internal audits are conducted as required as part of the EMS Program. External audits of the SFI standard are conducted by certified auditors (registrars) to confirm that the SFI Standard is being met. Audit reports are reviewed internally, then submitted to SFI, who then post the reports on their public website (http://www.forests.org). An annual audit summary may be posted on the company websites.

Performance Measure 16.2.

Certified Organizations shall report annually to *SFI Inc.* on their conformance with the *SFI 2022 Forest Management Standard.*

Indicator 1: *Prompt response to the SFI annual progress report survey.*

The information for the SFI Annual Progress Report will be submitted prior to the specified deadline.

Indicator 2: *Record keeping for all the categories of information needed for SFI annual progress report survey.*

The EMS program specifies procedures for record keeping.

Indicator 3: *Maintenance of copies of past reports to document progress and improvements to demonstrate conformance to the SFI 2022 Forest Management Standard.*

Past reports will be retained by the Company. The EMS identifies where the reports will be kept, the format, and the duration of storage. The first reporting period for this 'multi-site' certification was back in the 2013 calendar year.

Objective Supporting Information and Records

Audit Reports, SFI Progress Reports

OBJECTIVE 17. MANAGEMENT REVIEW AND CONTINUAL IMPROVEMENT.

To promote continual improvement in the practice of *sustainable forestry* by conducting a management review and monitoring performance.

Performance Measure 17.1.

Certified Organizations shall establish a management review system to examine findings and progress in implementing the *SFI 2022 Forest Management Standard*, to make appropriate improvements in *programs,* and to inform their employees of changes.

Indicator 1: *System to review commitments, programs and procedures to evaluate effectiveness.*

Refer to Indicator 3, below.

Indicator 2: *System for collecting, reviewing and reporting information to management regarding progress in achieving SFI 2022 Forest Management Standard objectives and performance measures, including measures to reduce the negative impacts from forest management operations.*

Refer to Indicator 3, below.

Indicator 3: *Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the SFI 2022 Forest Management Standard.*

A Management Review of the EMS and SFI Program to assess the conformance and performance of the Program against the SFI standard will be conducted on at least an annual basis. The purpose of the review is to confirm that:

- The EMS and SFMP continues to be suitable, effective and adequate
- Appropriate direction and resources are provided
- The EMS and SFMP will achieve continual improvement in environmental performance and sustainable forest management

Areas requiring improvement are identified, and corrective actions will be identified and implemented within a specified timeframe.

Objective Supporting Information and Records
Gorman Group SFMP
Gorman Group EMS
Annual Management Review Meeting Agenda/Minutes

- end -