

Tree Farm Group Certification

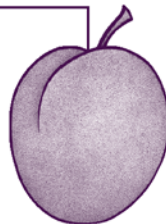
Audit Report

Small Woodland Owners
Association of Maine

FINAL

December 31, 2003

The
PLUM LINE
SPECIALIZING IN SUSTAINABLE
FOREST MANAGEMENT SYSTEMS



The Plum Line
Sustainable Forest Management Systems
Tree Farm Group Certification
S.W.O.A.M. Audit Report

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Sustainable Forest Management Systems
Tree Farm Group Certification
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Introduction

The Small Woodland Owners Association of Maine (SWOAM) organized a group of forest landowners (“SWOAM Stewardship Family” or “Group”) for the purpose of seeking third-party certification under the American Tree Farm System (ATFS) group certification process. SWOAM requested a group audit to certify that its Group members’ management conforms to the *American Forest Foundation Standards of Sustainability for Forest Certification on Private Land* December 2002 edition (the Standard). An audit team assembled by *The Plum Line* (TPL) completed an audit in September and October 2003 to make a determination regarding the conformance of the Group’s process and performance to the Standard according to the American Tree Farm System’s *Group Certification Process – Auditing Procedures for Group Certification and Qualifications Criteria for Group Certification Bodies*.

The American Forest Foundation (AFF) is the parent organization responsible for developing and maintaining the American Tree Farm System (ATFS). The mission of the ATFS is “to promote the growing of renewable forest resources on private lands while protecting environmental benefits and increasing public understanding of all benefits of productive forestry.” To accomplish this mission, ATFS has educated, assisted, and certified almost 65,000 landowners and their Tree Farms covering 85 million acres of forestland (and including 26 million acres of private, non-industrial forestland acres) with the help of some 7000 volunteer foresters. Although this is the oldest and largest forest certification program in the world, with the expectation of an increasing demand for wood from certified forests, there is potential for ATFS to grow significantly. With millions of non-industrial private forestland owners in the US holding nearly 300 million acres of land, however, the potential for expanding the Tree Farm program is unlikely to be met through continued reliance solely on the services of volunteers.

Fortunately, there are numerous other organizations in the US that also provide forest management assistance or supervision to non-industrial forest owners, including private consultants, forest industry “landowner assistance programs” (LAPs), state agency “Forest Stewardship” and property-tax reduction programs, landowner associations and even a small (but growing) number of forest landowner cooperatives. By using the infrastructure and systems of these organizations to provide information about their participants and some degree of consistency in the management of participants’ lands, the certification of their participants to ATFS standards could be achieved more economically and more rapidly than through the provision of Tree Farm services on the traditional landowner-by-

landowner basis by volunteer inspecting foresters. To this end, the ATFS has developed guidelines for group memberships, and audit procedures and qualifications for “third-party” group certifiers.

To test and help develop the potential for such “group certifications” and the documents supporting them, the ATFS has sponsored a series of pilot group certification audits of four such organizations.

To accomplish this goal, The Plum Line (TPL - an accomplished sustainable forest management assistance and certification auditing partnership) is providing the necessary group certification auditing services. Innovative Natural Resource Solutions LLC, based in New Hampshire and Maine, and Strategic Resource Systems from Michigan are the partner companies of TPL.

SWOAM has organized a group of forest landowners that includes 37 individual landowners owning over 18,000 acres of forestland in Maine (at the time of the audit). A standard application process for inclusion into the group (and criteria for membership) has been developed by SWOAM. As with the SWOAM group, the ATFS group process anticipates growth within the groups organized.

1. *Audit Parameters:*

1.1 Client and Auditee

SWOAM is the Group Manager client that requested TPL to audit the Group identified by SWOAM as the auditee to the Tree Farm Standard. The audit was sponsored, contracted, and funded in cooperation with SWOAM by the American Tree Farm System (ATFS).

1.2 Audit Scope and Objective

This certification audit applied to the SWOAM Group activities as they relate to its Stewardship Family members (the Group Members). The objective of the audit was a third-party certification of the Group to the Standard as a pilot audit of the new ATFS Group Certification Process. The American Tree Farm System is responsible for issuing the certification should TPL find the SWOAM Group in conformance with the Tree Farm Standard.

As part of the pilot phase of the ATFS Group Certification Process, TPL has also reviewed the Group's organization according to the ATFS *Guidelines for Group Members and Group Organizations* to provide this information to ATFS. TPL has not, however, formally determined conformance to the Guidelines and this secondary audit objective (documented in Section 5, below) is separate from and does not affect the results of the objective of determining conformance to the Tree Farm Standard.

Finally, in addition to and separate from this report, TPL was also requested to include in the audit a series of additional indicators (beyond the Tree Farm Standard) requested by the State of Maine, Department of Conservation. A separate report has been sent to the ATFS and Maine Department of Conservation describing the findings relative to these additional indicators.

1.3 Audit Standards and Criteria

Determination of conformance to the Standard was based entirely and solely in the text of the December 2002 version of the *American Forest Foundation Standards of Sustainability for Forest Certification on Private Land* which is attached to this report as **Appendix A** (and includes indicator by indicator audit evidence overviews).

Audit procedures and auditor qualifications for the audit were consistent with the current *Group Certification Process – Auditing Procedures for Group Certification and Qualifications Criteria for Group Certification Bodies* of the ATFS.

Any determination of conformity to the Standard or consistency between the audit procedures and the *Auditing Procedures for Group Certification* were the responsibility of the lead auditor. Recognized international standards for environmental management system auditing (ISO 19011) were also used to interpret or apply the provisions of the *Auditing Procedures for Group Certification*.

1.4 Roles and Responsibilities

The SWOAM Group's representative with respect to this audit was Mandy Farrar, the Group Administrator.

The lead auditor was Charles A. Levesque of *The Plum Line* partner firm, Innovative Natural Resource Solutions, LLC, based in Antrim, NH. The other member of the audit team was Dr. David Capen, wildlife biologist, of Grand Isle, Vermont and a faculty member at the University of Vermont, Burlington. William Rockwell, of *The Plum Line* partner firm Strategic Resource Systems, served the role of document reviewer/audit manager and was not on-site. Mr. Rockwell also served as the appeal body as outlined in **Appendix B**.

The specific audit protocols and procedures that applied to this audit, including terms of appeal, are included in a document of that name attached as **Appendix B** of this plan.

1.5 Confidentiality

All TPL audit team members maintain complete confidentiality regarding any aspect or fact of the audit until such time as released from specific terms of this confidentiality in writing by the Group Manager.

2. Audit Procedures:

2.1 Preliminary Meeting and Determination of Readiness

A preliminary meeting (pre-certification meeting) between the Group and the lead auditor, was held at the Group headquarters in Augusta, Maine, on September 25, 2003. The procedures of the Group were reviewed at that time, and the general substance of the audit plan was discussed and agreed to. In addition, evidence of conformance provided to TPL in advance of the meeting by the Group was discussed relative to Standard conformance. A sample field audit was conducted for one member of the SWOAM Group.

As a result of that meeting, review, and agreement, it was determined that the Group was ready to undergo a full certification audit as outlined in the audit plan, subject to items outlined in the determination of readiness letter found in **Appendix C**.

2.2 Audit Schedule and Procedures

The following schedule was followed for the office and field audit performed by the audit team from October 29-31, 2003:

2.2.1 Training:

The audit team met in Augusta, ME, for orientation on the application of the Standard and preliminary audit evidence on the evening on October 28, 2003.

2.2.2 Opening Meeting:

An opening meeting was held at the Group offices in Augusta, Maine at 5:30 a.m. on Wednesday, October 29, 2003. In attendance at the meeting was: Group Administrator Mandy Farrar and other SWOAM representatives Patrick Strauch and Everett Towle. The purpose of this meeting was to review the audit criteria and process and confirm the local field audit plan and responsibilities, followed by an office document and process review (see **Appendix D** for an agenda for this meeting). At this meeting, there was also a review of the travel logistics proposed by SWOAM based on the landowners selected by TPL prior to the audit.

2.2.3 Field Audit Sample:

Group certification is based on the principle that it is not necessary to visit every Group member to determine that efficacy of the Group's procedure and conformance to the Standard, and that a sampling process can suffice. The selection of the field sites, however, is key to the outcome of the audit.

TPL believes that efficient sampling uses prior knowledge of management systems and risk factors in forestry to pick observations that can reveal the reliability of forest management. Experience has shown that:

1. Observing many practices at one site is efficient and reveals management system interrelations.
2. Some environments are inherently more risky than others – e.g., near water.
3. Sampled sites should provide a reasonable sampling of the population of practices.
4. The variation of staff performance is proportional to the independence of staff and their distance from a home office (in the case of the SWOAM Group, independent managers of distinct ownerships).
5. Travel costs between potential observation sites are usually high.
6. Auditees are more familiar with travel times than are auditors.
7. Auditees are naturally motivated to reveal conformance but not non-conformance.
8. Given enough time between sample selection and actual observation, auditees can improve the condition of sites, records, and staff knowledge.

TPL, therefore uses the following sampling strategy principles to accomplish this result:

1. A preference for sites with multiple treatments.
2. A preference for sites with known risk factors – e.g., water.
3. Gathering data about sites, practices, organization, and staff before site selection.
4. Stratification of observations by administrative unit and individual staff member.
5. Selection of sites along efficient travel routes.
6. Reliance on the auditee to help determine the efficiency of audit routes.
7. Maintaining auditor authority to select sites and to alter the selection of sites.
8. Announcing site selections only shortly before observations are made.

Based on the principles and criteria above, from the population of 37 SWOAM Group members (some with multiple forest tract ownerships), TPL selected 16 potential forest tract sample sites representing 15 individual SWOAM Group members. The general descriptions of the sample chosen can be found in the “SWOAM Group” section later in this document. During the audit, one additional site was added to the original list of 16 and 2 sites with redundant qualities were dropped to save time.

The initial group of 16 sites was provided to SWOAM one-week in advance of the audit in order to properly notify landowners, obtain their permission to access their properties and to notify the managing forester involved in order to include both the landowner and the forester on site during the audit. While this forester/landowner combination occurred on the majority of the field sites, several audit site visits included only the landowner or the forester, and in one case, neither.

2.2.4 Field Audit Schedule:

Each field day began with a brief opening meeting to confirm the day’s schedule, responsibilities, and arrangements; to procure any additional needed documents; and to answer preliminary questions. Each day concluded with a brief closing meeting to review the day’s findings, to confirm plans for the evening, and to confirm plans for the next day.

On the first day of the audit, Wednesday, October 29, once the opening meeting was concluded, the team visited 7 Group members with multiple field sites (in northern/central Maine). On the second field day, Thursday, October 30, the team visited 6 Group members with multiple field sites (in southern Maine).

2.2.5 Closing Meeting:

Following a morning meeting of the audit team, the formal closing meeting was held at the Group office in Augusta at 10:15 a.m. on Friday, October 31. This meeting included an oral presentation on the determination regarding overall conformance of the Group's management to the Standard. Attendance at this meeting included Joel Swanton, Patrick Strauch, Mandy Farrar, David Capen, Everett Towle, Josiah Pierce, Thomas Doak, and Charles Levesque.

2.2.6 Audit Report:

A draft audit report was circulated to the audit team for comment on November 21, 2003. The draft was then submitted to Mandy Farrar for review of matters of fact by SWOAM. A final report and determination with respect to conformance was transmitted in electronic copy and paper to Mandy Farrar on December 31, 2003.

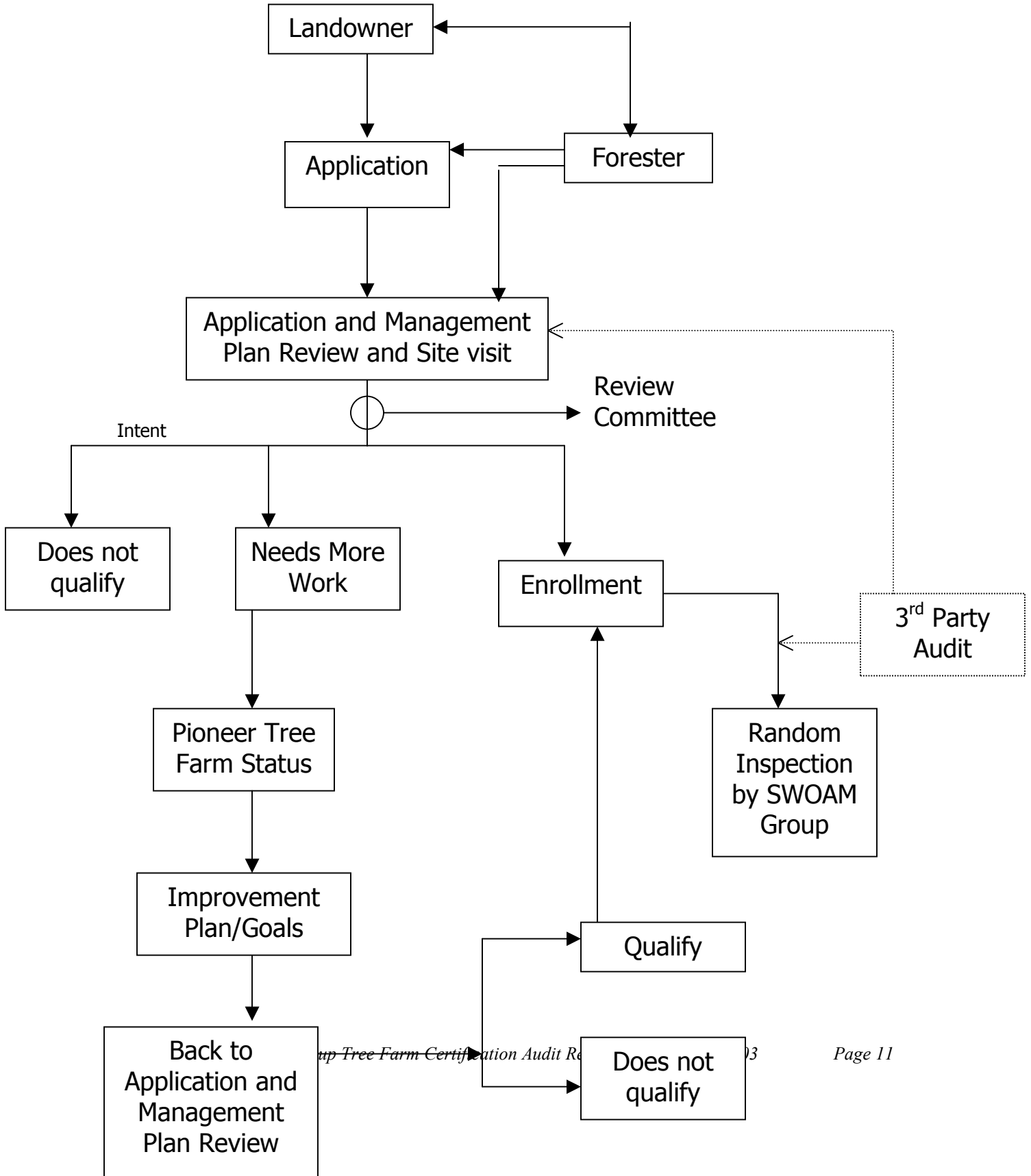
3. *The SWOAM Stewardship Family Tree Farm Group*

Since SWOAM Group Administrator Mandy Farrar was hired in May, 2003 to both develop the SWOAM Stewardship Family processes as well as implement them, the Group has been organized to include 37 individual members owning over 18,000 acres (at the time of the audit). This Group contains a wide-ranging set of owners from nearly all regions of the state (12 of Maine's 16 counties are represented). During the audit, the audit team was told that many other landowners have showed interest in becoming part of the SWOAM Group. SWOAM has plans to enlarge the Group.

The following list provides some information about the group of landowners who comprised the group at the time of the audit:

	Acres	County	Existing Tree Farmer
Landowner 1	123	Hancock	N
Landowner 2	928	Oxford, Cumberland, Franklin, Kennebec	Y
Landowner 3	211	Washington	N
Landowner 4	1600	York	Y
Landowner 5	64	Penobscot	N
Landowner 6	150	Penobscot	Y
Landowner 7	1037	York	Y
Landowner 8	175	Cumberland	Y
Landowner 9	230	Sagadahoc	N
Landowner 10	176	Kennebec	Y
Landowner 11	40	Kennebec	N
Landowner 12	1400	Cumberland	Y
Landowner 13	235	Cumberland	N
Landowner 14	200	Somerset	N
Landowner 15	380	Franklin	N
Landowner 16	350	Oxford	N
Landowner 17	200	Cumberland	Y
Landowner 18	890	Pisataquis	Y
Landowner 19	84	Waldo	Y
Landowner 20	94	Somerset, Cumberland	N
Landowner 21	85	Penobscot	N
Landowner 22	530	Somerset, Cumberland	N
Landowner 23	110	Cumberland	N
Landowner 24	171	York	Y
Landowner 25	138	Piscataquis	Y
Landowner 26	400	Cumberland	N
Landowner 27	55	York	N
Landowner 28	451	York, Cumberland	Y
Landowner 29	700	Washington	Y
Landowner 30	160	Hancock	Y
Landowner 31	127	Penobscot	Y
Landowner 32	548	Penobscot	Y
Landowner 33	997	Penobscot	Y
Landowner 34	97	Pisataquis	N
Landowner 35	1690	Penobscot	Y
Landowner 36	55	Penobscot	Y
Landowner 37	3503	Throughout state	Y
TOTAL Acreage	18384		

The SWOAM Group process includes an adopted set of Policies and Procedures (see Appendix E), an application process and a formal internal monitoring or auditing process. The general procedure for admitting members to the Group is best described by a SWOAM diagram:



4. Conformance Terminology, Process and Findings

4.1 Terminology and Process

In reviewing each Standard, Performance Measure, and Indicator, the audit team decided one of three outcomes: that conformance was demonstrated; that conformance was not demonstrated (a “major non-conformance”); or that conformance was not fully demonstrated, but that the non-conformance was not materially problematic to the application of the Standard (a “minor non-conformance”).

A determination of non-conformance by an auditor was brought to the attention of the lead auditor at the earliest opportunity and then documented on a Non-Conformance Report form. The lead auditor first presented this evidence or determination to the Group to enable the Group to provide clarification or alternative evidence during the audit. Formal Non-Conformance Report forms were then issued at the Closing meeting for those non-conformances that remained.

To be judged in overall conformance to the Standard, the Group must demonstrate substantial conformance to each performance measure and indicator of the Standard. Any major non-conformance or a sufficient accumulation of minor non-conformances results in a determination of non-conformance with the Standard as a whole.

The specific audit protocols and procedures that applied to this audit, including terms of appeal, are included in a document of that name attached as **Appendix B** of this report.

4.2 Conformance Findings

The audit team records provide detailed information and evidence documenting conformance to each indicator, performance measure, and standard (see Appendix A for a summary by indicator). The following is a general summary and excerpt of conformances found during the audit. (It is not intended to be an exhaustive review of conformance demonstrated by the auditee.) Non-conformances are addressed in Section 4.3.

Standard 1: Ensuring Sustainable Forests

This Standard refers to a requirement that Tree Farms must be inspected (audited) by inspecting foresters. The third-party audit performed and which is the subject of this report is evidence of conformance to this Standard. In addition, though not required, as part of SWOAM’s internal monitoring system, the SWOAM Stewardship Family membership processes require that each member entering the group be subject to an inspection by a certified inspecting forester.

Standard 2: Compliance With Laws

Indicator 2.1.2 Landonner obtains advice from forestry consultants, public agency natural resource managers, or contractors who are trained in, and familiar with, applicable laws, regulations and published Best Management Practices for forestry.

It was clear to the auditors that SWOAM and the American Tree Farm System have an effective system of communication and training that brings small woodland owners into contact with well-informed advisors and consultants who are aware of the many laws and regulations that affect forest management in Maine. Although a minor non-conformance was found relative to this Indicator (see Section 5), significant conformance was also found for other Group members.

Standard 3: Commitment to Practicing Sustainable Forestry

Indicator 3.1.1: Management plans include: title page; type of ownership (e.g., fee simple, limited partnership, etc.); owners goals appropriate to the management objectives; tract map noting stands and conditions, important features including special sites, and management recommendations that address wood and fiber production, wildlife habitat, owner-designated fish, wildlife and plant species if desired, environmental quality, and, if present and desired by the landowner, recreational opportunities.

Indicator 3.1.2: Management plan is active, adaptive, and embodies the owners' current objectives, remains appropriate for the land certified, and reflects the current state of knowledge about forestry and natural resource management.

Notwithstanding one minor non-conformance on these indicators, the majority of management plans examined were more than adequate, and about one-third of the plans went well beyond minimum conformance to the Standard. On-site visits confirmed forest management consistent with and largely in conformance with the plans, a key provision in the Tree Farm Standard.

Standard 4: Reforestation

Indicator 4.1.1: Harvested forest land must achieve satisfactory stocking levels reflecting the forest owner's management objectives, within five years after harvest, or within a time interval as specified by applicable regulation, whichever is shorter.

Across all site visits, auditors observed evidence of concern for future stands and stand conditions and stocking levels that supported these concerns. Not a single instance of inadequate regeneration was observed.

Standard 5: Air, Water, and Soil Protection

Indicators 5.1.2: Landowner must minimize disturbances within riparian zones.

Indicators 5.1.3: On-site visit confirms that landowner is conducting management activities in accordance with BMPs and all relevant forest practices act[s] and ordinances.

Throughout the various management plans and across field sites, auditors found evidence of suitable concern for riparian zones, and often observed riparian buffers that exceeded minimum standards. Landowners and their foresters generally were quite familiar with intent and implementation of BMPs. Conformance was outstanding, and several observation sites could easily be used as exemplary

implementation of BMPs. It should be noted that immediately prior to and during the audit, approximately 5.5 inches of rain fell on the areas of Maine subject to the audit. There were a few exceptions relative to BMP implementation that generated minor non-conformance reports.

Indicators 5.2.1: Chemicals are applied only when necessary to meet specific management objectives.

Indicators 5.2.2: Management plans consider integrated pest management as a preferred means of controlling insect pests, pathogens, and vegetative competition.

Use of chemicals to combat forest pests or undesirable plant species was rarely recommended in management plans and even more rarely used on sites visited. Where chemicals have been used, licensed applicators were employed and there was no evidence of chemicals stored on site. Management plans often lacked descriptions of preferred integrated methods of pest management, but site visits illustrated widespread knowledge of forest pests and silvicultural approaches for dealing with them.

Standard 6: Fish, Wildlife, and Biodiversity

Indicator 6.1.1: Where practical, management plans consider and address opportunities to protect rare species and special habitat features.

Although there were deficiencies in several management plans relating to research on possible locations of rare species and communities, there were other plans that contained excellent sections on conservation of wildlife and biodiversity. On-site visits confirmed positive outcomes from the frequently stated management objectives of improving habitat for wildlife. Auditors saw numerous examples of retention of snags, ample downed woody debris, protected vernal pools and trout streams, maintenance of beech and oak trees for mast production, and other such practices.

Standard 7: Forest Aesthetics

In only one instance, was there any question by the auditors about this Standard. Small woodland owners in this sample were unusually concerned about the appearance of their properties, even instances when owners did not live on or near the properties.

Standard 9: Wood Fiber Harvest and Other Operations

Indicator 9.2.1 In selecting contractors, landowners seek loggers, foresters, and other forest management contractors who have completed recommended training and education programs offered in their respective states.

Evidence submitted and acquired in the field indicated that this Standard was met and often exceeded, consistent with conformance to Standard 2. The community of foresters and loggers employed by participants in the SWOAM Stewardship Family presents excellent credentials of training and education.

4.3 Non-Conformance Findings

During the audit, 5 minor non-conformances and 2 major non-conformances were issued. During the closing meeting, evidence was provided that resulted in the elimination of one minor non-conformance.

To review the significance of non-conformances to the outcome of the audit, the following is offered:

In order to be recommended for certification to the American Tree Farm System, all minor non-conformances found, documented, and issued during the audit must be accompanied by approved remedy plans provided by SWOAM and approved by the lead auditor with advice from the audit team. All major non-conformances found must also include approved remedy plans that have successfully been completed to the satisfaction of the lead auditor.

4.3.1

Non-conformance #1 – Minor

Audit criterion: Standard # 2 Perf Meas # 2.1 Indicator # 2.1.1

Indicator 2.1.1

Landowner affirms that he/she complies with all relevant laws and regulations, and that he/she will correct conditions that led to adverse regulatory actions, if any.

SWOAM has chosen to conform to this Indicator through the use of a written and signed affirmation that says that the landowner will comply with all relevant laws and regulations, and that he/she will correct conditions that led (lead) to adverse regulatory actions. From the written materials provided, five landowners had not signed such an affirmation entering the closing meeting of the audit. SWOAM has since developed a plan to remedy this non-conformance and has completed the remedy by providing written and signed affirmations from all members sampled. It is assumed that SWOAM will assure that members of the Group not audited will also conform to this portion of the Standard if they had not already done so and all future members will do the same.

Status of non-conformance: Remedy Plan deemed adequate. Remedy completed and non-conformance closed.

4.3.2

Non-Conformance #2 – Minor

Audit criterion: Standard # 2 Perf Meas # 2.1 Indicator # 2.1.2 &
Standard # 9 Perf Meas # 9.2 Indicator # 9.2.1

Indicator 2.1.2

Landowner obtains advice from forestry consultants, public agency natural resource managers, or contractors who are trained in, and familiar with, applicable laws, regulations and published Best Management Practices for forestry.

Indicator 9.2.1

In selecting contractors, landowners seek loggers, foresters, and other forest management contractors who have completed recommended training and education programs offered in their respective states.

In the case of two SWOAM members, evidence provided during the audit suggested that two contractors (one for each of these two landowners) were not trained in the applicable laws and/or BMPs for protection of water quality. During the on-site audit, one landowner suggested that he would not use the services of the untrained logger any longer. The second landowner admitted that his road-building contractor had no BMP training. This evidence was offered as the audit team reviewed a recent road construction job that the contractor had completed where BMPs were not properly applied.

In the first instance, evidence offered after the audit demonstrated that the logger was, indeed, trained, in that he had been through the training in Maine's Certified Logging Professional program but chose not to be certified. The Standard requires training, not certification.

In the second case with the road-building contractor, a remedy plan was offered and accepted to train the landowner in laws and BMPs (the landowner is also the logger on this property) and, further, have the landowner affirm that, in the future, he would only hire contractors who had been trained in applicable laws/regulations and BMPs. Both of these remedies have been completed.

Status of non-conformance: Plan for remedy accepted, remedy completed and non-conformance closed.

4.3.3

Non-Conformance #3 – Minor

Audit criterion: Standard # 5 Perf Meas # 5.1 Indicator # 5.1.3

Indicator 5.1.3

On-site visit confirms that landowner is conducting management activities in accordance with BMPs and all relevant forest practices act[s] and ordinances.

One Group landowner added several new sections of road to his property in 2003 to access an area that has not been harvested in the recent past. This new road work included new culverts to drain intermittent streams (flowing readily during the audit). Installation included: steep bank slopes (undersized road width), undersized (length and possibly diameter) culverts and excessive height of culvert installation and sediment pools on each side of culvert openings. Installation clearly demonstrated a lack of understanding of BMP implementation. This situation is related to 4.3.2 above in that the road-building contractor was not trained in BMPs. The lack of training, in this case, resulted in improper road installation relative to BMPs.

A second landowner member had just had a logging operation completed that included an access road with a relatively steep slope leading into a stream that lacked a waterbar or turnout to divert road run-off from entering the stream.

One of several major access roads for a third landowner included a short hill slope near a culvert that drained a large wetland into a pond (water supply reservoir). During the site visit

the road showed erosion from the recent rain and small puddles remained in the road tracks that were draining silt into the water of the wetland immediately adjacent to the in-flow to the culvert and also a non-vegetated section on the road edge slope on top of the culvert which was also draining a small amount of silt into wetland (and then into culvert).

The remedy proposed for the first situation was outlined in the previous 4.3.2 and did not include re-building the new road section because it would do more damage. This remedy (training landowner and assuring only trained contractors would be used) was accepted. This remedy has been completed and is noted above. For the second landowner, a detailed plan for on-the-ground remediation was provided and accepted. Subsequent completion of the remedy plan was confirmed via digital photographs. For the third landowner a plan for remediation was also provided and accepted.

Status of non-conformance: Three plans for remediation provided and accepted. Two of the plans completed (as noted) before this final audit report was issued.

4.3.4

Non-Conformance #4 – Minor

Audit criterion: Standard # 6 Perf Meas # 6.1 Indicator # 6.1.1

Standard # 6 Perf Meas # 6.2 Indicator # 6.2.1

Standard 6 Forest management activities contribute to the conservation of biodiversity and maintain or enhance habitat for native fish, wildlife, and plant species, with emphasis on natural plant and animal communities and rare plants and animals.

Performance Measure 6.1

Landowners are encouraged to confer with their local natural resource agencies, state natural resource heritage programs, or other knowledgeable sources about rare species or species of concern that occur on their property.

Indicator 6.1.1

Where practical, management plans consider and address opportunities to protect rare species and special habitat features.

Performance Measure 6.2

Forest management activities must maintain or enhance habitat for owner's designated fish, wildlife, and plant species as identified in the management plan

Indicator 6.2.1

Forest management activities must maintain or improve habitat for owner's target game and non-game fish and wildlife species.

Under the Tree Farm Standard (see above), landowners need to both confer with wildlife and rare species experts to develop management plan recommendations regarding these resources as well as demonstrate conformance through field application of the management plan (based on the recommendations of the experts). In the major non-conformance issued regarding Standard 3 (next non-conformance 4.3.5), wildlife recommendations in the plan are also part of this larger issue on wildlife habitat. Under the audit sample for SWOAM's Group the audit team found evidence of conformance in plans and in the field for certain landowners. In the field, the audit team didn't find practices inconsistent with the intent of the language in Standard 6 but most of those management activities have not occurred within the context of a logical progression required by the Tree Farm Standard – i.e., management plan language on wildlife/biodiversity from experts leading to implementation

in the field to conserve habitat and rare plant and animal species. Overall, given the very light manipulation of vegetation on most of the properties seen in the field audit sample, there is little concern for the conservation of biodiversity and habitat. However, the Standard requires consultation with experts, plan recommendations and implementation of plans in the field to conserve these resources.

SWOAM offered a remedy plan that included: adding language in the management plans to address wildlife habitat and rare plants and animals (also part of next non-conformance remedy), contact with Maine Department of Inland Fisheries & Wildlife experts to determine if rare habitat/species are found on the Group properties and recommendations on how to manage for them, assistance by the Maine Natural Areas Program to review the properties of the SWOAM Group to determine if any rare species or habitat exist on Group properties and how to manage for them (to be added to the management plans). These remedy steps were accepted. All of this remedy was completed by the date of this report except for implementation of management plan recommendations, which will take place in the future as management activities occur on the Group properties.

Status of non-conformance: Remedy plan accepted and partial remedy was completed by the date of this report.

4.3.5

Non-Conformance #5 – Major

Audit criterion: Standard # 3 & 5 Perf Meas # 3.1 & 5.2 Indicator # 3.1.1, 3.1.2, 5.2.2
Indicator 3.1.1

Management plans include: title page; type of ownership (e.g., fee simple, limited partnership, etc.); owners goals appropriate to the management objectives; tract map noting stands and conditions, important features including special sites, and management recommendations that address wood and fiber production, wildlife habitat, owner-designated fish, wildlife and plant species if desired, environmental quality, and, if present and desired by the landowner, recreational opportunities.

Indicator 3.1.2

Management plan is active, adaptive, and embodies the owners' current objectives, remains appropriate for the land certified, and reflects the current state of knowledge about forestry and natural resource management.

Indicator 5.2.2

Management plans consider integrated pest management as a preferred means of controlling insect pests, pathogens, and vegetative competition.

Management plans for 10 of the 16 landowners in the audit sample were lacking at least some information required by the Standard (see above listed requirements). The items lacking included: threatened & endangered species, special sites, Integrated Pest Management, and clearly stated landowner objectives.

The magnitude of the non-conformance (10 of 16 plans lacking required information) clearly suggested a major non-conformance requiring remedy before certification.

SWOAM's remedy plan was to develop a sample plan for Group members that includes all necessary components required by the Standard, update all deficient plans in the sample and a plan to update all plans in the Group as a whole by 1/31/04.

Status of non-conformance: Remedy plan was accepted. Remedy plan was completed by the date of this report. Non-conformance closed.

4.3.6

Non-Conformance #6 – Major

Audit criterion: Standard # 8 Perf Meas # 8.1 Indicator # 8.1.1

Standard 8: Protect Special Sites

Special sites are managed in a way that recognizes their unique characteristics.

Performance Measure 8.1

Forest management practices must recognize historical, biological, archaeological, cultural, and geological sites of special interest.

Indicator 8.1.1

Management plan and forest operations identify and manage for special sites in a manner consistent with forest owner's objectives, the unique features of the site, and the size and scale of the property.

Given the progression of Standard language in Standard #8, it is important to describe the audit team's interpretation to fully understand non-conformance 6. The Standard identifies five kinds of special sites: historical, biological, archaeological, cultural, and geological. Standard #8 itself provides the most clarity of what this portion of the Standard requires:

Special sites are managed in a way that recognizes their unique characteristics.

Combining this requirement with Performance Measure 8.1 and Indicator 8.1.1 means that, in order for Standard #8 to be met, first the landowner's management plan must include identification of "special sites". This means that a source of credible information on special sites must be sought to "identify" potential special sites on the landowner's property. Second, the plan must include management recommendations addressing how the special sites will be managed (if any are identified). Third, the management practices on-the-ground must demonstrate conformance with the management plan recommendations for the special sites.

The lack of management plan references, identification, and management practices to address these unique features was pervasive in the audit sample. For those plans that did include references, more information and management recommendations for biological (ecological) special sites were noted among the landowners than for the other four special site types. Some landowners clearly went to all available sources to seek out this information, but the majority did not. In the field, landowners and most foresters simply did not know what they had relative to special sites (and consequently, were not in a position to manage for them).

The SWOAM remedy is designed to seek out available public information about the five special site types for the properties in the Group (and for prospective members); amend the management plans to include this special site information where found; resulting in management practices on-the-ground in the future consistent with the special sites recommendations in the plans. The remedy includes a plan to update all non-audit sample plans and recommendations by 1/31/04.

Status of non-conformance: The remedy plan was been accepted. The remedy has been completed as of the date of this audit report. This non-conformance is closed.

5. Findings to ATFS relative to the SWOAM Group's organization according to the ATFS Guidelines for Group Members and Group Organizations

As part of its new program for Group certification under the Tree Farm Program, the American Tree Farm System developed *Guidelines for Group Members and Group Organizations (Guidelines)* a set of recommended system protocols for groups to use in creating or setting up landowner groups for the purpose of Group Certification under the American Tree Farm System. This Guidelines document can be found in **Appendix F**.

While not in the scope of the third-party audit of SWOAM, *The Plum Line* did review the organizational systems and processes in order to report on its findings relative to the group Guidelines. These findings follow.

SWOAM's Stewardship Family has significant policies, procedures and systems in place to address the *Guidelines for Group Members and Group Organizations*. SWOAM has in place the following documents describing its procedures, policies and systems:

- Introductory letter sent to prospective Group members
- Group member application including affirmation
- Application Approval Form
- Fact Sheet on responsibilities requirements for group members
- Management Plan checklist
- Field Check Sheet for monitoring
- SWOAM Stewardship Family Policies and Procedures
- Annual Renewal and Questionnaire
- Internal Auditing Procedure
- SWOAM Group brochure
- Tree Farm Standard field card

The following outlines the section-by-section findings relative to the *Guidelines*:

5.1 Scope and Commitment

As part of the SWOAM application process, the landowner establishes the acreage to be included in the group and commits to maintaining this land in conformance with the Tree Farm Standard.

5.2 Consent Form

The affirmation section of the SWOAM group application includes language relative to obligations of the group's members, the time frame covering the agreement, authorization to the Group Organization to apply for certification, and for a Certification Body to access the property.

5.3 Legal Requirements

SWOAM is not-for-profit organization with an IRS 501(c)(3) designation. It has an official and permanent address at P.O. Box 836, Augusta, ME 04332-0836 (physical location at the Arboretum building complex at 153 Hospital Street in Augusta).

The SWOAM Group has a part-time Group Manager (Mandy Farrar) who has a full-time paid position with the organization and who is responsible for all the administration, management, and day-to-day operations of the Group.

5.4 Eligibility and Information to Prospective Members

The SWOAM Group Policies and Procedures document includes the following policies on eligibility, leaving the group and et al:

- Group member/certification Process Description
- Internal Dispute Resolution
- Departure from the Group
- Expulsion from the group
- External Dispute Process
- Appeals Process for Expulsion

5.5 Application Process

SWOAM uses a standard application process for those landowners interested in joining the group.

5.5 Pre-inspection

As part of the application process, the SWOAM determines whether the applicants' subject forestlands meets all of the ATFS certification requirements, through direct field inspection by certified inspecting foresters. These processes are document on standard field forms.

5.6 Pioneer Tree Farm Status

If conformance to the Standard is not fully achieved in the pre-inspection by SWOAM, the applicant may be placed in a Pioneer Tree Farm status. The Pioneer Group Member can graduate to full Group Member status upon successful surveillance or re-audit by the Certification Body. At the time of the audit, no Pioneer Members were in the Group.

5.7 Completion of the Application Process

Clear records of approved applications and a list of Group members was made available to the audit team during the audit process.

5.8 Departure from the Group

SWOAM has procedures for departure from the Group by landowners wishing to leave. As a new group, it is believed that no departure procedures have been used to date.

5.9 Expulsion from the Group

SWOAM has a clearly documented procedure for expelling members who do not meet the Group eligibility standards after they have become members. Again, the Group is new and these procedures have not been tested.

5.10 Administration of the Group Organization

The SWOAM Group Manager administers the day-to-day affairs of the Group. This clearly involves monitoring implementation of the ATFS Performance Measures through the internal application process and managing the independent Certification Process through *The Plum Line* audit.

5.11 Implementing The Standard

The SWOAM Group Organization communicates the requirements of the Standard and any related requirements to the Group Members as part of the application and acceptance process to ensure that forest management operations are conducted consistent with those requirements.

5.12 Management Plan

SWOAM's Group member application process assures that each member has a written management plan before being accepted into the Group (subject to their other requirements). SWOAM does not keep a copy of the management plan on file at the Group office.

5.13 Internal Monitoring

SWOAM procedures include an internal monitoring process with a specified protocol. With such a new group, the procedures have yet to be implemented. The written plans suggest implementation in the second year of operation of the group through a sampling process.

5.14 Group Records

Based on limited observations during the audit process, it appears that the SWOAM Group identifies and retains documents that pertain to the management of the Group's forests for purposes of management continuity, internal monitoring, or independent certification, including:

- 1) the names and particulars of Group Members;
- 2) maps or other depictions of the forest areas that are included in the Group;
- 3) the signed applications and consent forms from Group Members;
- 4) documentation of the pre-inspection audit;

No policy or procedure was found that discussed document control to assure that documents are retained, in what form and for what period.

5.15 Internal Dispute Resolution

SWOAM policies and procedures include a process for dealing with internal disputes between Group Members, between Group Members and the Group Organization, and the Group Manager.

5.16 External Complaint Process

The SWOAM Group's Policies and Procedures includes procedures for handling concerns or complaints submitted by external parties.

5.17 Conclusion about SWOAM Stewardship Family Group organization, administration and procedures.

SWOAM's processes are reasonably consistent with the *Guidelines* document to the extent of the documents and procedures observed during the audit. While a very new group, the organizational processes managed by Group Manager Mandy Farrar appear to be exemplary.

During the audit, SWOAM demonstrated their willingness to adjust their procedures and policies as needed, something they, no doubt, will be faced with as the Group matures.

A single finding of this cursory review that may be of procedural value to SWOAM is the lack of a system of document control and labeling to assure the most up to date forms, policies and procedures are being used and so that out-of-date documents are properly retired so as not to confuse SWOAM staff, foresters involved with management of Group member lands and the group member landowners themselves.

6. Audit Conclusion

The SWOAM Stewardship Family Tree Farm Group is found to be in conformance with the *American Forest Foundation Standards of Sustainability for Forest Certification on Private Land* December 2002 edition at this time. *The Plum Line* recommends the SWOAM Stewardship Family Tree Farm Group for certification by the American Tree Farm System.

Appendix A

American Forest Foundation/American Tree Farm System

Standards of Sustainability For Forest Certification

Including Performance Measures and Field Indicators

Adopted December, 2002
(To Be Implemented 2004)

Standards of Sustainability for Forest Certification On Private Lands

(Evidence notes in italics from SWOAM audit)

Standard 1: Ensuring Sustainable Forests

The American Forest Foundation's (AFF) Standards of Sustainability promote the growing of renewable forest resources on private lands while protecting environmental benefits and increasing public understanding of all benefits of productive forestry.

This Standard refers to a requirement that Tree Farms must be inspected (audited) by inspecting foresters. The third-party audit performed and which is the subject of this report is evidence of conformance to this Standard. In addition, though not required, as part of SWOAM's internal monitoring system, the SWOAM Stewardship Family membership processes require that each member entering the group be subject to an inspection by a certified inspecting forester.

Performance Measure 1.1

Qualified forest owners must comply with AFF's Standards of Sustainability. American Tree Farm System (ATFS)'s volunteer network of accredited, qualified natural resource managers will conduct field verification of landowner conformance.

Indicators 1.1.1

An accredited Tree Farm Inspector must inspect qualified properties to assure conformance with AFF's standards of sustainability.

Indicator 1.1.2

Tree Farm inspectors will audit certified properties every five years. Properties that fail to meet AFF's standards and guidelines will be decertified. [Landowners may seek review of decertification decisions through ATFS's formal dispute resolution process.]

Standard 2: Compliance With Laws

Forest management complies with all relevant federal, state and local regulations and ordinances.

Performance Measure 2.1

Forest owners must comply with all relevant federal, state, county, and municipal laws and regulations.

All office records and field observations (note non-conformances under BMPs) showed compliance to laws and regulations.

Indicator 2.1.1

Landowner affirms that he/she complies with all relevant laws and regulations, and that he/she will correct conditions that led to adverse regulatory actions, if any.

Written affirmations from all group members in audit sample were observed.

Indicator 2.1.2

Landowner obtains advice from forestry consultants, public agency natural resource managers, or contractors who are trained in, and familiar with, applicable laws, regulations and published Best Management Practices for forestry.

It was clear to the auditors that SWOAM and the American Tree Farm System have an effective system of communication and training that brings small woodland owners into contact with well-informed advisors and consultants who are aware of the many laws and regulations that affect forest management in Maine. Although a minor non-conformance was found relative to this Indicator (see Section 5), significant conformance was also found for other Group members.

Standard 3: Commitment to Practicing Sustainable Forestry

Forest owners demonstrate their commitment to sustainability by developing and implementing a long-term forest management plan.

Performance Measure 3.1

Forest owners must have a written forest management plan consistent with the scale of forestry operations of the property.

All group members in audit sample had written management plans.

Indicator 3.1.1

Management plans include: title page; type of ownership (e.g., fee simple, limited partnership, etc.); owners goals appropriate to the management objectives; tract map noting stands and conditions, important features including special sites, and management recommendations that address wood and fiber production, wildlife habitat, owner-designated fish, wildlife and plant species if desired, environmental quality, and, if present and desired by the landowner, recreational opportunities.

Notwithstanding one minor non-conformance on this and the next indicator (see non-conformance section of this report), the majority of management plans examined were more than adequate, and about one-third of the plans went well beyond minimum conformance to the Standard.

Indicator 3.1.2

Management plan is active, adaptive, and embodies the owners' current objectives, remains appropriate for the land certified, and reflects the current state of knowledge about forestry and natural resource management.

On-site visits confirmed forest management consistent with and largely in conformance with the plans, a key provision in the Tree Farm Standard.

Performance Measure 3.2

Forest owners assure management activities are conducted in accordance with the management plan.

Indicator 3.2.1

On-site visit, interviews, and records confirm management activities are being conducted in accordance with the plan.

Conformance confirmed on field visits and through interviews with landowners and their forest managers.

Standard 4: Reforestation

Forest owners provide timely restocking of desirable species of trees, compatible with regional ecosystems on harvested areas and idle areas where tree-growing is the land use objective.

Performance Measure 4.1

Land must be reforested with natural seeding, sprouting, direct seeding, or reforestation with tree seedlings.

Prolific reforestation was noted on all sites observed. The vast majority of regeneration observed resulted from natural means.

Indicator 4.1.1

Harvested forest land must achieve satisfactory stocking levels reflecting the forest owner's management objectives, within five years after harvest, or within a time interval as specified by applicable regulation, whichever is shorter.

Across all site visits, auditors observed evidence of concern for future stands and stand conditions and stocking levels that supported these concerns. Not a single instance of inadequate regeneration was observed.

Standard 5: Air, Water and Soil Protection

Forestry practices maintain or enhance the environment, including air, water, soil, and site quality.

Performance Measure 5.1

Forest owners must adhere to State Forestry Best Management Practices (BMPs) and comply with all relevant forest practices act(s) and ordinances.

Indicator 5.1.1:

Landowner affirms that he/she complies with all relevant laws and regulations, and that he/she will remedy or has remedied any conditions that led to adverse regulatory actions, if any.

Written affirmations observed for all Group members in audit sample.

Indicator 5.1.2:

Landowner must minimize disturbances within riparian zones.

Throughout the various management plans and across field sites, auditors found evidence of suitable concern for riparian zones, and often observed riparian buffers that exceeded minimum standards.

Indicator 5.1.3

On-site visit confirms that landowner is conducting management activities in accordance with BMPs and all relevant forest practices act[s] and ordinances.

Landowners and their foresters generally were quite familiar with the intent and implementation of BMPs. Conformance was outstanding, and several observation sites could easily be used as exemplary implementation of BMPs. It should be noted that immediately prior to and during the audit, approximately 5.5 inches of rain fell on the areas of Maine subject to the audit. There were a few exceptions relative to BMP implementation that generated minor non-conformance reports (see non-conformance section).

Performance Measure 5.2

Application of forest chemicals must not exceed the levels necessary to achieve specific management objectives.

Evidence for all indicators under this Performance Measure: Use of chemicals to combat forest pests or undesirable plant species was rarely recommended in management plans and even more rarely used on sites visited. Where chemicals have been used, licensed applicators were employed and there was no evidence of chemicals stored on site. Management plans often lacked descriptions of preferred integrated methods of pest management (since remedied – see non-conformances section of report), but site visits illustrated widespread knowledge of forest pests and silvicultural approaches for dealing with them.

Indicator 5.2.1

Chemicals are applied only when necessary to meet specific management objectives.

Indicator 5.2.2

Management plans consider integrated pest management as a preferred means of controlling insect pests, pathogens, and vegetative competition.

Indicator 5.2.3

Chemicals are applied in accordance with EPA-approved labels and meet or exceed all human health and environmental safety requirements on the label, and in local, state, and federal law.

Performance Measure 5.3

Where prescribed fire is used, the forest owner must plan appropriately for its application.

No prescribed fire used by Group members in audit sample.

Indicator 5.3.1

Landowner affirms that if and when prescribed fire is used, it is conducted in accordance with the owner's management plan and with state and local laws and regulations.

Indicator 5.3.2

On-site visit confirms prescribed fires, if used, were conducted in accordance with the management plan and applicable laws and regulations.

Standard 6: Fish, Wildlife and Biodiversity

Forest management activities contribute to the conservation of biodiversity and maintain or enhance habitat for native fish, wildlife, and plant species, with emphasis on natural plant and animal communities and rare plants and animals.

Performance Measure 6.1

Landowners are encouraged to confer with their local natural resource agencies, state natural resource heritage programs, or other knowledgeable sources about rare species or species of concern that occur on their property.

The non-conformances section notes some deficiencies for certain Group landowners under this Performance Measure but others in Group audit sample demonstrated use of resource professionals and source materials.

Indicator 6.1.1

Where practical, management plans consider and address opportunities to protect rare species and special habitat features.

Although there were deficiencies in several management plans relating to research on possible locations of rare species and communities (see non-conformances section of this report), there were other plans that contained excellent sections on conservation of wildlife and biodiversity. On-site visits confirmed positive outcomes from the frequently stated management objectives of improving habitat for wildlife. Auditors saw numerous examples of retention of snags, ample downed woody debris, protected vernal pools and trout streams, maintenance of beech and oak trees for mast production, and other such practices.

Performance Measure 6.2

Forest management activities must maintain or enhance habitat for owner's designated fish, wildlife, and plant species as identified in the management plan.

Indicator 6.2.1

Forest management activities must maintain or improve habitat for owner's target game and non-game fish and wildlife species.

Where landowners had target game and non-game fish and wildlife species (several did), practices observed clearly were maintaining or improving these habitats.

Standard 7: Forest Aesthetics

Forest management practices minimize negative visual impacts of forest activities.

Performance Measure 7.1

Landowners must manage their forest with concern for visual impacts, in a manner consistent with size and scale of their forestry operations.

In only one instance, was there any question by the auditors about this Standard. Small woodland owners in this sample were unusually concerned about the appearance of their properties, even instances when owners did not live on or near the properties.

Indicator 7.1.1

On tracts of significant visual exposure, management plans and forest operations may include: roadside buffers, access entry "dog-legs," limited harvests in certain areas, and adaptation of other visual management techniques.

These various techniques for visual quality were observed on many of the parcels in the audit sample where recent forest operations occurred. On others where operations haven't occurred in many years, other longer lasting techniques were observed such as road entrance layout and design; seeding of landings; care about harvest levels and intensity when observable from public ways.

Standard 8: Protect Special Sites

Special sites are managed in a way that recognizes their unique characteristics.

Performance Measure 8.1

Forest management practices must recognize historical, biological, archaeological, cultural, and geological sites of special interest.

Some evidence of conformance relative to ecological special sites was noted for certain properties in the SWOAM Group audit sample but significant deficiencies existed relative to this Performance Measure which have since been remedied and are described in the non-conformance schedule in this report.

Indicator 8.1.1

Management plan and forest operations identify and manage for special sites in a manner consistent with forest owner's objectives, the unique features of the site, and the size and scale of the property.

Where management plans had identified special sites, appropriate management to protect those sites was noted. See non-conformance section.

Standard 9: Wood Fiber Harvest and Other Operations

Wood fiber harvests and other forest operations are conducted in accordance with the management plan and with sensitivity to other forest values (e.g., water quality, regeneration, wildlife habitat, biodiversity, special sites, etc.).

Performance Measure 9.1

Landowners must comply with the management plan described in Standard Three (3). *Management plan implementation conformance was noted on all Group members in the audit sample. See non-conformance section for non-conformance issues around management plans.*

Performance Measure 9.2

Landowners must adhere to all national, state, and local laws and regulations applicable to forest management when conducting forest operations.

This is duplicative of another Performance Measure and Indicator in the Standard – conformance was widely found relative to law/regulation compliance.

Indicator 9.2.1

In selecting contractors, landowners seek loggers, foresters, and other forest management contractors who have completed recommended training and education programs offered in their respective states.

Evidence submitted and acquired in the field indicated that this Standard was met and often exceeded, consistent with conformance to Standard 2. The community of foresters and loggers employed by participants in the SWOAM Stewardship Family presents excellent credentials of training and education.

Indicator 9.2.2

Loggers and contractors conducting wood fiber harvests and other forest management operations carry required Workers Compensation and general liability insurance.

Loggers and contractors with employees are required to carry Workers Compensation in Maine. Those contractors who worked on Group members in the audit sample who were required to carry insurance had it. No requirements exist in Maine relative to contractor's carrying general liability insurance but several contractors did carry this insurance as well.

Appendix B

The Plum Line Sustainable Forest Management System Audit Protocols & Procedures

Purpose: The purpose of a sustainable forest management system (SFMS) audit is to determine conformance of an organization's SFMS design and performance to an established standard.

Policy: An SFMS audit judges conformity of an organization's SFMS design and performance to an established standard. A determination of conformance is based on comparing objective evidence presented by the audited organization against the audit criteria. An auditor's expertise enables an informed judgment about the conformance of relevant evidence to the standard. The SFMS audit does not otherwise judge the quality of an organization's SFMS or the standard against which it is judged.

Roles & Definitions (bold terms are also listed and defined):

Audit Criteria: The audit criteria are the established audit **standard** and the agreed upon indicators of **conformance** to that **standard**.

Audit Manager: The audit manager arranges the terms of an audit with the organization to be audited and engages a **lead auditor**.

Auditee: An auditee is the subject of an audit.

Auditor: An auditor employs special expertise to make an informed judgment about the **conformance** of relevant evidence to a **standard**.

Client: A client engages an **audit manager** to administer an audit.

Conformity or conformance: A pattern of congruity or correspondence between an observation and a **standard**.

Evidence: Evidence is an objective fact or observation relevant to a determination of **conformity**.

Lead Auditor: The lead auditor works with the **audit manager** to select other **auditors** to complete the audit team.

Major non-conformance: A major non-**conformance** is a deviation of an SFMS from a **standard** severe enough to threaten the viability of the SFMS in terms of the **standard**.

Minor non-conformance: A minor non-**conformance** is a deviation of an SFMS from a

standard that is not severe enough to threaten the viability of the SFMS in terms of the **standard**.

Standard: A standard is an recognized document serving as a basis for evaluating a system.

Procedures:

1. All contacts between auditors and the client/auditee should assume the utmost in respect and cordiality by all parties.
2. Auditors work under the direction, responsibility, and authority of the lead auditor.
 - a) Auditors are to perform functions assigned within the scope of the audit.
 - b) Auditors should be able to expect the full cooperation of the client/auditee.
 - c) Auditors are to respect the confidentiality of the client/auditee.
3. Auditors are to document all evidence of conformance in appropriate formats.
4. Auditors should assist the auditee in identifying evidence of conformity consistent with established audit criteria, but should not make an independent determination of what constitute valid audit criteria.
5. Evidence or a determination of non-conformance by an auditor is to be documented in appropriate formats and brought to the attention of the lead auditor at the earliest opportunity. The lead auditor will then present this evidence or determination to the auditee to enable the auditee to provide clarification or alternative evidence.
6. To the extent possible, differences of opinion regarding conformity should be worked out between the parties involved in terms of the agreed upon audit criteria.
7. Any necessary appeal of the judgment of the lead auditor should be made to the audit manager on a timely basis.
8. Any final determination of conformance is the responsibility of the lead auditor.
9. The lead auditor's draft report and determination regarding conformance will be reviewed by the audit team as a whole. Audit team comments will be weighed carefully by the lead auditor in the drafting of the final report.
10. The audit manager will carefully consider the audit report as the basis for a determination of conformance. Any determination at odds with that of the audit report should be based on a clear finding of error or oversight in the conduct of the audit.

Appendix C

Determination of Readiness Letter

September 26, 2003

Mr. H. William Rockwell, Jr.
The Plum Line/Strategic Resource Systems
700 South Oakland
St. Johns, MI 48879

SUBJECT: SWOAM Stewardship Family Determination of Readiness for ATFS Group Audit

Dear Bill:

Based on the September 25, 2003, preliminary meeting in Augusta, Maine, it is my determination as lead auditor that the Small Woodland Owners Association of Maine' Stewardship Family (SWOAM) is prepared to undergo a full Group Tree Farm certification audit using the December 2002 version (effective 2004 but chosen as the criteria by SWOAM) of the American Tree Farm System Standard, subject to the following conditions:

SWOAM will develop the following or provide evidence of the following (numbers and italics refer to sections in American Tree Farm Standard) prior to or during the October 29-31, 2003 field audit -

2.1.1 Landowner affirms that he/she complies with all relevant laws and regulations, and that he/she will correct conditions that led to adverse regulatory actions, if any. SWOAM will provide a written affidavit from all group members of this affirmation. This also applies to indicator 5.1.1.

2.1.2 Landowner obtains advice from forestry consultants, public agency natural resource managers, or contractors who are trained in, and familiar with, applicable laws, regulations and published Best Management Practices for forestry. SWOAM to provide evidence that consultants, agency managers or contractors providing advice to SWOAM group members are trained.

3.1.1 Management plans include: title page; type of ownership (e.g., fee simple, limited partnership, etc.); owners goals appropriate to the management objectives; tract map noting stands and conditions, important features including special sites, and management recommendations that address wood and fiber production, wildlife habitat, owner-designated fish, wildlife and plant species if desired, environmental quality, and, if present and desired by the landowner, recreational opportunities. SWOAM to provide evidence that group member management plans include all required items as described in this indicator (mapped special sites and wildlife habitat recommendations noted absent in two plans reviewed during preliminary meeting).

5.2.2 Management plans consider integrated pest management as a preferred means of controlling insect pests, pathogens, and vegetative competition. SWOAM to provide evidence that IPM is considered in management plans of group members.

Performance Measure 8.1 Forest management practices must recognize historical, biological, archaeological, cultural, and geological sites of special interest. Indicator 8.1.1 Management plan and forest operations identify and manage for special sites in a manner consistent with forest owner's objectives, the unique features of the site, and the size and scale of the property. SWOAM to provide evidence that special sites are identified and managed consistent with 8.1.1.

9.2.1 In selecting contractors, landowners seek loggers, foresters, and other forest management contractors who have completed recommended training and education programs offered in their respective states. SWOAM to provide evidence that group members "seek" trained loggers, foresters and other contractors.

9.2.2 Loggers and contractors conducting wood fiber harvests and other forest management operations carry required Workers Compensation and general liability insurance. SWOAM to provide clarification on State of Maine Workers Compensation insurance and general liability insurance requirements. If required, SWOAM to provide evidence that these insurance requirements are being met by group members.

In addition, the field audit will include seeking evidence of conformance relative to the following indicators: 3.1.2, 3.2.1, 4.1.1, 5.1.1, 5.1.2, 5.1.3, 5.2.1, 5.2.3, 5.3.1, 5.3.2, 6.1.1, 6.2.1, and 7.1.1.

The audit plan was reviewed at the preliminary meeting and the final audit plan will be signed at the opening meeting of the audit at the SWOAM headquarters in Augusta, Maine on October 29, 2003 (see attached). The Plum Line encourages SWOAM to provide a copy of this audit plan to all those who will be subject to the audit.

An additional issue for SWOAM determination prior to the field audit in October is the designation of "observers". At this time, only Mandy Farrar, Joseph Pierce and Everett Towle (and various group member landowners and their foresters) will be part of the audit. Observers present will not be allowed to participate in the audit. The number of observers should be limited so as not to impede the progress of the audit.

If you or SWOAM have any questions about this determination of readiness, please do not hesitate to contact me.

Sincerely,



Charles A. Levesque
Lead auditor

Enc.

Appendix D

Opening Meeting Agenda

Small Woodland Owners Association of Maine Tree Farm Group Certification Audit

October 29, 2003

1. Introductions
2. Review agenda
3. Audit Plan review/approval
4. Results of preliminary review of documentation/outstanding issues – readiness letter
5. Audit process:
 - the Tree Farm Standard
 - policies and plans – implementation on the ground
 - intent, implementation, results (performance)
 - evidence
 - conformance and non-conformance
 - ME Dept. of Conservation criteria
(for SWOAM to assist: percentage of properties and percentage of acres with management plans developed through Maine’s Forest Stewardship Program)
6. Safety/health issues/legal (illegal)
7. Audit observers & participants
8. Logistics/itinerary
9. Other

Appendix E

SWOAM Stewardship Family Group Policies, Procedures and documents

SWOAM
Stewardship
Family

Group Certification
for
Small Landowners

Policies and Procedures

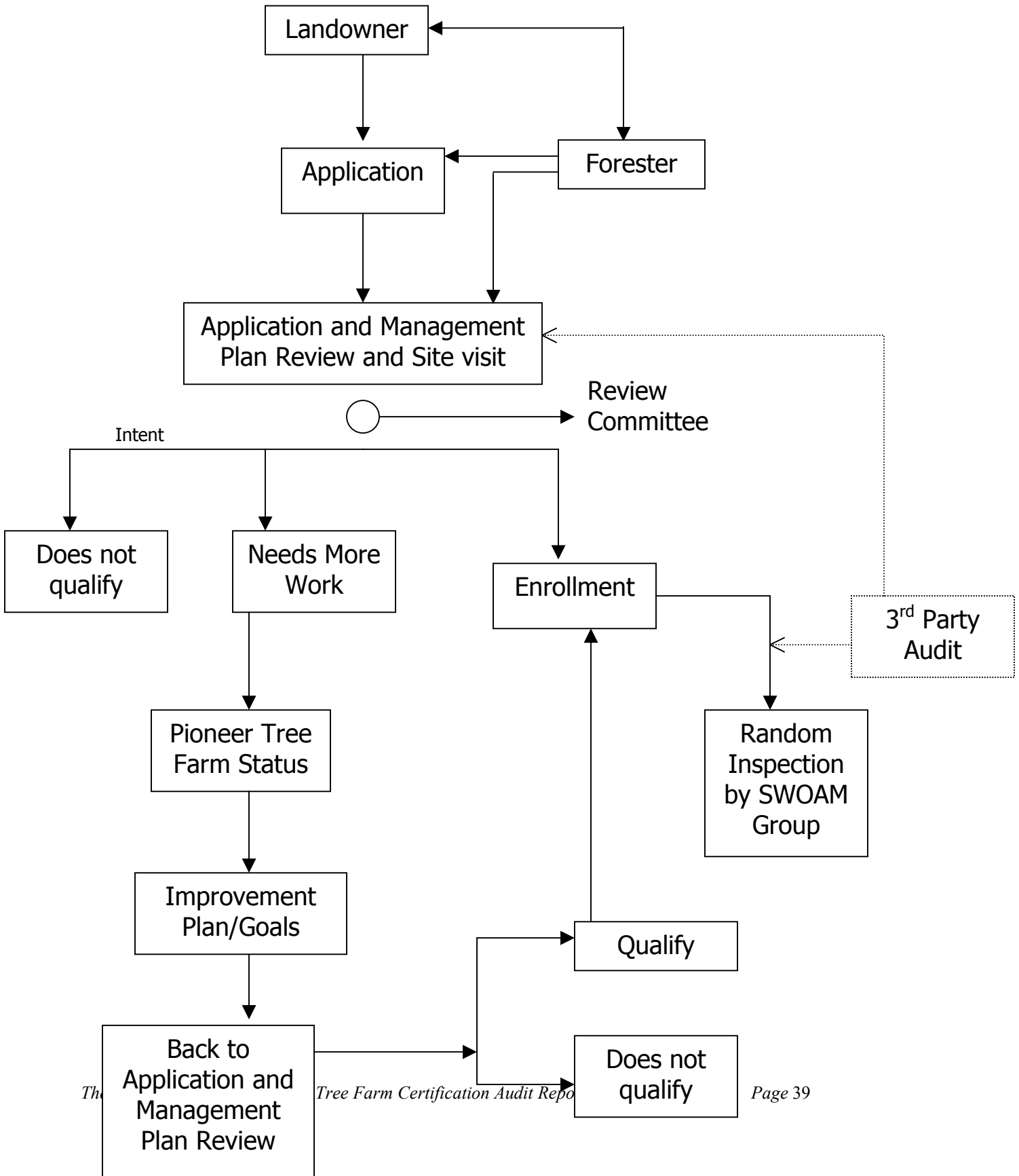
Approved 7/23/03

Certification Process

The following list outlines the process of certification. Following this list, there is a flow chart that also demonstrates the process.

1. A landowner shows interest in being certified.
2. With the help and input of his or her forester, an application is filled out and sent to the group administrator. In addition, the landowner is requested to send out a copy of his or her management plan for the group administrator to review. A management plan may be reviewed on site as. If this occurs, the management plan review will be done in conjunction with a site visit, providing the plan fits the standard.
3. After application and management plan review, a site visit will be conducted by a license forester and Tree Farm Inspector to insure that lands are being managed in compliance with the standard.
 - a. If both the management plan and site visit confirm that the landowner is in compliance then he or she will be enrolled in the group.
 - b. If the landowner does not fully comply with the standard, and has good intent, then he or she is enrolled as a Pioneer Tree Farmer. After developing an improvement plan and goals to address non-conformances, he or she will be reconsidered for certification after revisiting their application, management plan, and land.
 - c. If the landowner does not comply and does not wish to comply, then he or she is not eligible.
4. After enrollment, the landowner may be subject to a 3rd party audit to verify that the process ensured that he or she fit the standard. In addition, the landowners may be subject to random internal audits by the group organization.

Certification Process Flowchart



Internal Dispute Resolution

This refers to internal disagreement over the Group Certification Process and may arise between group members, between group members and the group organization, and the group administrator.

Process

- As soon as a complaint is received, the person making the complaint will receive a letter, which summarizes the complaint procedure, including:
 - How the complaint will be dealt with
 - Who is responsible for dealing with it
 - Timeframe for a response
 - Further action that is possible if the outcome is not satisfactory
- The complaint will be recorded and then allocated to a person responsible for ensuring that it is addressed.
- The most appropriate person to deal with a complaint will depend on whether the complaint is made against the group management or a group member.
 - Complaints against a group member:
 - Initially dealt with by group administrator
 - Complaint must be investigated, and if appropriate, action taken
 - Outcome of the investigation is to be reported to the complainant
 - If either the complainant or the member is not happy with the outcome, then either person has the option to appeal through the appeals committee
 - Complaints against the group management:
 - Dealt with by the appeals committee, as above.
- The following will be clearly documented and filed in the complaint file:
 - The date the complaint was received, who was responsible for addressing them
 - When the complaint was resolved and where the full information on the complaint can be found
 - Full information on complaints will be filed in the membership file under the members involved in the complaint.

Departure From the Group

If the property is sold or the member no longer wishes to participate in the SWOAM Stewardship Family, you must notify the Group Administrator in writing.

Participation is voluntary, and members are allowed to end their participation at anytime. However, part of the Tree Farm standards require long-term commitment to certified management, and therefore, members may not be allowed to rejoin the group, or former members may be put on a probationary period.

Expulsion From the Group

To ensure compliance with the Tree Farm Standards, it is necessary for members of the group to maintain their commitment to the standards. In the event that a Group Member is found to be in persistent non-conformance with the Standard, (or otherwise in violation of the Group agreement), that member will be made ineligible to market products as certified and that member's status will be changed to Pioneer Tree Farm. Also, the SWOAM Stewardship Family review committee will determine an appropriate probationary period and corrective action to be taken if the member would like to stay in the group. To avoid conflicts with the standards, members are encouraged to communicate with their natural resource manager and the group administrator as much as necessary to avoid misunderstandings. Conflicts will largely be avoided if members just make sure their management plan is reviewed and approved by the SWOAM Stewardship Family and any subsequent harvest or other treatments are done in accordance with this plan. Any harvests or subsequent treatments should be recorded in members SWOAM Stewardship Family Notebook, and group members will inform the group administrator through the annual questionnaire.

External Dispute Process

Procedures for handling concerns or complaints submitted by external parties will be handled in the same way as internal dispute process is.

**SWOAM Stewardship Family
153 Hospital Street
P.O. Box 836
Augusta, ME 04332-0836**

Member name
Member address

Date

Dear --,

I am writing to acknowledge receipt of your complaint to explain to you the process which will now be followed.

1. If your complaint is against a member of the SWOAM Stewardship Family, then it will be allocated to the chairperson of the Complaints and Appeals Committee to investigate. He will be asked to look at two things:

- firstly, whether the issue you have raised is one which is covered by the requirements of the group, and if it is,
- secondly, whether there is evidence to confirm the complaint.

If the issue is not one which is covered by the group requirements then you will be informed of this in writing.

If the issue is covered by the group requirements and further investigation is required, then it is likely that you will be contacted by the investigator to collect more information and also to ask you if you wish to be involved in seeking a resolution.

If you do wish to be involved in resolving this issue, then a meeting will be set up between you, the member you have made the complaint against and the investigator. If possible this meeting will be set up within a month of the date of this letter. The meeting will be used to discuss the issue and how to resolve it. The outcome will be documented and you will be given a copy.

If you do not wish to be involved in resolving this issue, or if it is not possible to involve you, then you will be informed of the outcome in writing within one month of the date of this letter.

If you are unhappy with the outcome, then you can lodge an appeal as set out in (3) below.

2. If the complaint is against the group management.

If the complaint was against an individual member of staff in the group management, then the same procedure as above will be followed, with the Group Administrator acting as the investigator.

If the complaint was against the group manager or the management in general, then the complaint will be dealt with by the Complaints and Appeals Committee.

The chairperson of the committee will allocate the investigation to a committee member who will then follow the same process as outlined in (1) above.

If you are unhappy with the outcome, you can lodge an appeal as set out in (3) below.

3. Making an appeal.

If you are not happy with the response to your complaint then you can lodge an appeal. **This must be done within 30 days of receiving the letter of notification of the outcome of the complaint.**

To make an appeal, you should send a letter directly to Your appeal should be sent directly to Everett Towle, Chairperson of the Complaints and Appeals Committee who deal with all complaints at 235 Waterman Road, Buxton, ME 04093.

Within 30 days of receiving an appeal, the chairperson must ensure that a meeting is held involving at least three members of the committee to consider your appeal. You may be asked to attend the meeting to answer questions, or to submit specific documents or information. The person you made your complaint against and the investigator may also be questioned.

At the end of the meeting the Committee will produce a written decision. You will be provided a copy of this.

The decision of the Committee is final and if you are still not satisfied with the outcome you will have to make a complaint to the group's Certification Body, The American Tree Farm System, 1111 19th Street, NW, Suite 780, Washington, DC 20036, (202) 463-2458.

If you have any questions on this procedure, do not hesitate to contact me.

Yours sincerely,

Mandy Farrar
Group Administrator

Expulsion Procedure

- Details of circumstances under which a member can be expelled
- The way in which a member will be informed of problems prior to expulsion
- The way in which a member will be informed of the expulsion
- The period within which the member can make an appeal against the expulsion decision
- The way any appeal will be dealt with

Circumstances for Expulsion

- Members has been informed that they are not in compliance with the group requirements and have failed to take action within the agreed upon time
- Member is in extreme non-compliance with group rules
- Member has failed to pay group fees despite repeated reminders

Informing members prior to expulsion

- Written information/Formal warnings
 - Clearly specify what the problem is and how long the member is being given to address the problem
- Procedure:
 - First letter (inform member of the problem)
 - Explain problem clearly
 - Give time to address it
 - Explain how Group Admin. will check the problem has been addressed
 - Suggest contacting the Group Admin. to discuss the prob,e
 - Clearly dated and signed
 - Copy on file
 - Second letter (if problem is not addressed-reminding them of the urgency of taking action and warning of the possibility of expulsion)

Informing group members of expulsion

- Send a letter informing them that the expulsion process has begun
 - Copy of expulsion procedure
 - Remind them they can no longer claim that their forest is certified
 - Remind them they have the right to appeal and have a specific period in which to do this
- Keep copy of letter in members file
- If no appeal is received within the maximum time period, a final letter should be sent to confirm the member is expelled

SWOAM Stewardship Family

**SWOAM Stewardship Family
153 Hospital Street
P.O. Box 836
Augusta, ME 04332-0836**

Member name

Member address

Date

Dear --,

It is with regret that I am writing to inform you that you are being expelled from the SWOAM Stewardship Family. Your expulsion is occurring as a result of your failure to address the Corrective Action request raised on [date] as a result of your failure to comply with [Standard].

This expulsion is effective immediately and you may no longer make any claims to belong to the group or to be certified, nor to have a forest managed in accordance with either the Group Requirements or the Tree Farm Standard.

If you wish to appeal against this decision, then you must do so within 14 days of receipt of this letter. Your appeal should be sent directly to Everett Towle, Chairperson of the Complaints and Appeals Committee who deal with all complaints at 235 Waterman Road, Buxton, ME 04093. If you would like a copy of the appeals procedure, I will be happy to send it to you.

If you have any questions please do not hesitate to contact me.

Yours Sincerely,

Mandy Farrar
Group Administrator

Appealing Against Expulsion

- Timing
 - A defined time within which the intention to appeal must be given. (2 weeks)
 - A defined time in which the appeals process will be set in motion. (1 week)
 - A maximum time from the point the appeals process begins to the point a decision is reached. (1 week)
- Process
 - Appeals committee (same group as review committee)

SWOAM Group Application:

Landowner Information

Owner _____
Last Name First Name Middle Initial
Address _____
City _____ State _____ Zip _____
Phone (____) _____ - _____ E-mail _____

Woodlot Information

Approximate acreages (must be in whole numbers): _____

Boundaries (circle one): *surveyed* *well defined* *not defined*
Ownership (circle one): *Fee Simple* *Limited Partnership* *Other* _____
Location of woodlot (include county) _____

Forester Information

Forester Name _____
Phone (____) _____ - _____ EMAIL _____
License number _____

Please answer the following questions:

How much of your land will be subject to the standard? (circle one):

all of your land* *part of your land* *separate management units

Do you currently have management plan? Yes No If yes, what is the date of your plan? _____

Are you a currently a member of (circle all apply): *SWOAM* *Tree Farm* *Neither*

As part of the fee you paid to become certified, you have an opportunity to become a member of both SWOAM and Tree Farm. Do you wish to be a member of (circle all apply):

SWOAM Tree Farm Neither Tree Farm nor SWOAM

Affirmation Statement

By signing this application for certification by the SWOAM Stewardship Family, you acknowledge that you have read and understand the Standards for Sustainability for Forest Certification on Private Lands as established by the American Forest Foundation and the American Tree Farm System. In addition, you understand that to be certified you will have to maintain an active management plan for your property.

By signing this you affirm that you are in compliance with all relevant laws and regulations, and will correct conditions that led to adverse regulatory actions.

You will also agree to allow SWOAM Stewardship Family Certifies access to your land, following appropriate notification, preferably with your forester present, for the purpose of reviewing the forest management activities and verifying that you are following the written management plan.

The SWOAM Stewardship Family is voluntary, and you are free to end your membership at anytime for any reason, but you may not be eligible to rejoin at a later date and any membership fees will not be reimbursed.

Please sign below as acknowledgement that you understand and agree to this commitment.

Signature _____ Date _____

**SWOAM Stewardship Family
PIONEER (PTF)/CERTIFIED TREE FARM (CTF)
Field Check Sheet**

Drafted 7/25/03

For office use only

PIONEER CERTIFIED REASON FOR
DECERTIFICATION

- | | |
|------------------------------------------------|-----------------------------------------|
| <input type="checkbox"/> Initial certification | <input type="checkbox"/> Deceased |
| <input type="checkbox"/> Recertification | <input type="checkbox"/> Sold |
| <input type="checkbox"/> Grad. PTF to CTF | <input type="checkbox"/> Substandard |
| <input type="checkbox"/> Decertification | <input type="checkbox"/> No interest |
| | <input type="checkbox"/> Missing Owners |

STATE _____ TREE FARM NUMBER _____

TREE FARMER INFORMATION

OWNER _____

ADDRESS _____

_____ ST _____ ZIP _____

PHONE (_____) _____ - _____

TREE FARM INFORMATION

TREE FARM ACREAGE NOW _____ (Must be in whole numbers)

OWNERSHIP: Fee Simple Limited partnership

Other _____

PRINCIPAL COUNTY _____

LOCATION OF _____

TREE FARM _____

DOES LANDOWNER LIVE ON TREE FARM? YES NO

TREE FARMER'S SIGNATURE _____

CERTIFYING FORESTER INFORMATION

1. FORESTER NAME _____

LIC. NUMBER _____ PHONE (_____) _____ - _____

2. FORESTER NAME _____

LIC. NUMBER _____ PHONE (_____) _____ - _____

TREE FARM STANDARDS MET

YES NO N/A

COMMENTS:

WRITTEN MANAGEMENT PLAN (Standard 3)	<input type="checkbox"/>	<input type="checkbox"/>		_____
COMPLIANCE WITH LAWS (Standard 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
REFORESTATION (Standard 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
WATER QUALITY/BMP'S/FPA (5.1.1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
RIPARIAN ZONES (5.1.2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
BIODIVERSITY (Standard 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
WILDLIFE HABITAT(6.2.1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
ENDANGERED SPECIES (6.1.1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
FOREST AESTHETICS (Standard 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
SLASH DISPOSAL & UTILIZATION...	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
LOGGERS/CONTRACTORS (Standard 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
PRUDENT USE OF CHEMICALS (5.2.1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
INTEGRATED PEST MANAGEMENT (5.2.2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
SPECIAL SITES (Standard 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
RECREATION (3.1.1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

TREE FARM ACTIVITY IN THE LAST FIVE YEARS:

CERTIFYING FORESTER'S SIGNATURE:

APPROVED (DATE) _____ BY _____

APPROVED (DATE) _____ BY _____

Appendix F

American Tree Farm System Group Certification Process

Guidelines for Group Members and Group Organizations

Section 1. Introduction

The American Tree Farm System was founded in 1941 as a way for private forest owners to assure the public and decision makers that U.S. forests were being renewed and managed in a sustainable manner. Over the past sixty years, Tree Farm has continued to grow and evolve and now includes 68,000 private forest owners that represent approximately 85 million acres. All of the certifications of conformance with the Tree Farm Standards have been based on individual certifications conducted by a volunteer force of professional forestry inspectors.

Over the past ten years, the concept of certification of “Good Forestry” by a professional forester that is embodied in the Tree Farm System has gained a substantial following, both within the U.S. and internationally. With the increased interest in forestry certification by the global forest products industry, customers, and other non-governmental organizations, the American Tree Farm System has experienced renewed interest.

Reflecting this renewed interest in forest certification, the American Forest Foundation (AFF) has revised its Performance Measures for Certification (See AFF Standards, Guidelines and Performance Measures for Forest Certification), **and herein will be referred to as The Standard.** These AFF Performance Measures require that each certified Tree Farmer be in compliance with all relevant laws and regulations, have a written forest management plan, reforest following harvest, protect water and soil quality, conserve wildlife and biodiversity, and consider visual impacts, among other considerations.

As part of a continuous improvement process and other program innovations ATFS has developed a “Group Certification” Procedure. Group Certification allows individual forest landowners to benefit from the “economies of scale” of being part of a larger group. The advantages of group certification include sharing information and the mutual support offered by a group, as well as efficiencies in implementing the standard and achieving certification by an independent auditor.

Group Tree Farm certification is the process of evaluating and certifying groups of forest owners under a single certificate. The following guidelines describe how landowners could join a group for purposes of implementing and becoming certified to the American Tree Farm System’s (ATFS) requirements. These guidelines also describe how a Group Organization can be formed to administer the Group Certification Process on behalf of the Group Members.

These guidelines are intended to help in the formation and administration of ATFS Groups, and are not in themselves a specification standard for use as audit criteria in a certification audit. They are generally consistent with those of other international group certification processes and programs, including: the Pan European Forest Certification (PEFC) Common Elements and Requirements, the Finnish Objectives and Application of Certification Scheme at Alternative Implementation Levels (SMS 1001), and the “Group Certification: Forest Stewardship Council (FSC) Guidelines for Certification Bodies.”

A companion document is the American Tree Farm System “Auditing Procedures for Group Certification and Qualifications Criteria for Group Certification Bodies”, which provides direction about procedures and protocols for Group Certification. It contains the elements of a third-party Group Certification and the qualifications criteria for the Certification Organizations and their auditors.

Section 2. References

The American Tree Farm System is governed by policies, procedures and programs that relate to the Group Certification Process and are contained in a number of documents referenced below:

- 1) The American Forest Foundation Standards, Guidelines, and Performance Measures for Forest Certification.
- 2) The American Tree Farm System: Tree Farm Inspector Education and Experience Guidelines
- 3) The American Tree Farm System: Group Certification Process: Auditing Procedures and Qualifications Criteria for Group Certification Bodies
- 4) The American Tree Farm System: Definitions of Terms
- 5) The American Forest Foundation: Charter and Bylaws

Section 3. Definitions

For purposes of the Group Certification Process, the relevant definitions are contained in “The Tree Farm System: Definitions of Terms.”

Section 4. Summary of the Group Certification Process

These guidelines for Group Members and Group Organizations under the American Tree Farm System describe how forest owners can individually and collectively implement and achieve conformance with the Tree Farm System Standard, Guidelines, and Performance Measures for Forest Certification.

Each Group Member is individually responsible for implementing the requirements of the Standard. Unless otherwise provided by their Group Organization, however, they will retain authority over their lands, their timber harvests, and their freedom to choose to enter or leave the group. In the event of a Group Certification, the Group Members do not hold individual certificates, but are covered under the Group Organization’s certificate.

The Group Organization oversees implementation of the Standard, monitors Member conformance, applies for Group Certification to one of the accredited Certification Bodies, and asserts to the Certification Body that each member of the Group is in conformance with the Standard. The Group is also responsible for establishing membership requirements, interpreting the Standard for the Members, keeping records, training staff and group members, and taking care of other administrative duties.

Group Organizations may engage in first- and second-party verification, as well as independent third-party certification of conformance to the Standard. The details of verification procedures and qualifications are found in “Auditing Procedures for Group Certification and Qualifications Criteria for Group Certification Bodies”.

Section 5. Responsibilities of Group Members

5.A. Reasons for Joining a Group Organization

Private forest owners make up the individual Group Members of the Group Organization. Individual landowners may want to join a group of landowners for purposes of ATFS certification or to share forestry information and services, to learn from other members of the group, gain assurance that their lands are managed according to a credible national standard for “Good Forestry,” and/or to keep forest management and certification costs to a minimum by gaining the efficiencies of scale of a larger group.

Forest owners that join a Group Organization may be members of a forest products company’s Landowner Assistance Program (LAP), may contract with a forestry consulting firm to manage their property, or may be a member of a state or regional association of woodlot owners, among other possible groups. Individual forest owners may form their own Group Organization to serve as the administrator of the Group for purposes of certification to the Standard.

5.B. Scope and Commitment

A forest owner joining a Group Organization needs to establish the scope of its operations that will be subject to the American Forest Foundation’s Standards of Sustainability and the American Tree Farm Systems performance measures and indicators (the Standard). A Group Member may choose to include all of its land ownership, or may choose distinct or separate management units. These management units may be geographically distinct, may be located in different states, and may contain different forest types.

In all cases, individual forest owners are joining the Group Organization of their own free will, and can enter or leave the group at any time. They should carefully read and be comfortable with all contractual arrangements, including issues of management control, requirements with respect to publicly available information, and procedures for departure or expulsion of members from the Group Organization.

Each forest landowner should be committed to maintaining his or her land in forest ownership and managing it according to the Standard. Group Members may wish to place restrictions or covenants on the sale of their property to maintain it within the Group Organization.

5.C. Consent Form

Each individual forest owner that is a member of the Group Organization must sign a consent form. The consent form will need to be signed by the person with direct responsibility or ownership of the property. The form should address the obligations of the group’s members, the time frame covering the agreement, authorization to the Group Organization to apply for certification, and for a Certification Body to access the property. The form should also specify any confidential information that should be protected during a Group Certification process or for any other purpose.

5.D. Implementation of Tree Farm Requirements

The individual landowner will be responsible for implementing each of the land management related requirements of the Standard, appropriate to the size and scale of the forest area involved. Responsibilities for meeting the requirements of the Standards cannot be traded between individual members of the Group Organization. Each member should be prepared to have his or her property periodically audited to assess conformance with the ATFS Standard, to provide certain information for monitoring purposes, and to take corrective action if their current management does not meet the requirements of the Standard.

5.E. Costs and Benefits of Group Membership

Group Members should be aware of all costs associated with joining the Group Organization, which may include membership fees and/or fees for the certification services of outside consultants and contractors. Members of the Group should also understand their rights and responsibilities to display Tree Farm Signs, receive Tree Farm Program newsletters and magazines, access or use a copy of the Group Certificate, make public claims regarding a Group Certification, and benefit from mutual recognition and other agreements entered into by AFF and ATFS.

Section 6. Responsibilities of the Group Organization

6.A. Legal Requirements

The Group Organization is the legal entity that works with the Group Members to implement and achieve the requirements of The Standard. Group Entities must be consistent with U.S. criteria and definitions for what constitutes a “legal organization.” Some of the criteria for qualifying as a legal entity may include, but are not limited to:

- 1) the Group Organization is legally registered as an independent company or organization;
- 2) the Group Organization has an official and permanent address; and
- 3) the Group Organization has an IRS tax identification number.

The Group Organization may be a company landowner assistance program, a landowner association, a consulting firm, a government agency, or some other legal organization that has management responsibility and authority. The Group Organization will generally have a full- or part-time manager that is responsible for managing all of the administrative details of the ATFS Group Implementation and Certification Process. The official representative of the Group Organization is the Group Manager, who will be the focal point for communication and administration of the Group Certification Process.

6.B. Responsibilities Related to Membership

The Group Manager is generally responsible for interpreting the ATFS Standard and clarifying which requirements apply to the Group Organization and which apply to Group Members. The Group Manager is also responsible for administering overall Group implementation and certification to the ATFS Standard. (Conversely, as discussed in Section 5, Group Members are responsible for implementing the specific on-the-ground management requirements of the Standard, unless those responsibilities have been clearly assigned to the Group.)

6.B.1. Eligibility and Information to Prospective Members

The Group Organization will need clear rules of eligibility for Group membership, (consistent with ATFS requirements), procedures and conditions for leaving the Group, and procedures for removing a Group Member.

The Group Organization is responsible for ensuring that new members understand the implications of joining the Group and managing their forests consistent with the ATFS Standard.

The Group Organization will need to develop informational materials to help prospective members understand Group policies and procedures and decide whether to join the Group. Information that should be provided in writing to the prospective Group Member includes:

- 1) general information about the Group Organization and its members;
- 2) a copy of The Standards and Performance Measures;
- 3) the obligations of group members in implementing and achieving the Standard;
- 4) an explanation of the Group Certification Process;
- 5) the provision for access to the Member's lands by the Group Organization and the Certification Body;
- 6) confidentiality provisions and protections;
- 7) any complaint and dispute resolution procedures;
- 8) provisions for removal from the Group; and
- 9) the costs of group membership, including any annual or periodic fees related to Group Certification..

6.B.3. Application Process

Application for membership in the Group should be on a standard written form. The application should include the consent form specified in Section 5C and the information listed there, and state that the applicant:

- 1) understands the requirements and conditions of Group Membership;
- 2) intends to manage its lands in conformance with the Standard; and
- 3) authorizes the Group Organization to administer the Group Certification process.

6.B.4. Pre-inspection

As part of the application process, the Group Organization should determine whether the applicants' subject forestlands meets all of the ATFS certification requirements, either by direct field inspection or other reliable means. The pre-inspection process should be documented in a manner that makes records for the individual subject ownerships available for examination by a Certification Body.

6.B.5. Pioneer Tree Farm Status

If conformance to the Standard is not fully achieved in the pre-inspection, the applicant may be placed in a Pioneer Tree Farm status. While a Pioneer Tree Farmer, the landowner can take steps to address the non-

conformances, but is not eligible to be a full member of the Group and be covered by the Group Certificate. Once all appropriate requirements are addressed and verified, the Pioneer Tree Farmer can advance to full-member status and be eligible to take part in a Group Certification Process.

Pioneer Tree Farm status is also available to applicants that apply for membership in the Group Organization after the initial certification audit has been conducted by the accredited Certification Body, and the Group Certificate has been issued. The Group Member can graduate to full Group Member status upon successful surveillance or re-audit by the Certification Body.

6.B.6. Completion of the Application Process

Clear records of approved applications should also be available for auditors. An approved application for membership, should be signed and dated by the Group Manager, confirmed in writing to the applicant, and kept on file by the Group Organization. The new member should be added to the membership list to ensure the receipt of all member information

6.B.7. Departure from the Group

Generally, applicants are expected to remain members of the Group for several years, consistent with the objective of sustainable forestry and continual improvement. If the property is sold or the member chooses to leave the Group, the member should notify the Group Manager in writing, who should maintain clear records of the departure event.

6.B.8. Expulsion from the Group

In the event that a Group Member is found to be in persistent non-conformance with the Standard (or is otherwise in violation of the Group agreement), an established and clearly documented procedure should be available for expelling the offending Member. This process should include procedures that protect the rights of both the Group and the Member as documented in the terms of membership, including an appeals process.

6.C. Administration of the Group Organization

The Group Organization will administer the day-to-day affairs of the Group. This will involve monitoring implementation of the ATFS Performance Measures and managing the independent Certification Process (if pursued). To carry this out efficiently, the Group Organization will need to consider the scope and size of the Group, its potential membership, and how many Group Members are optimal. Generally, the Group Members will be located within a similar geographic area, have the same legal and regulatory requirements, and may have similar ownership characteristics and climate, terrain, and forest types.

6.C.1. Implementing The Standard

The Group Organization will be responsible for communicating the Standard and any related regulatory or other requirements to the Group Members, and helping to ensure that forest management operations are conducted

consistent with those requirements. This could involve developing handbooks, training Group Members and contractors, monitoring performance, keeping records of problems, and taking corrective action as appropriate.

6.C.2. Management Plan

As part of ensuring the implementation of the Standard, the Group Organization should ensure that each Group Member has a written forest management plan consistent with the scope and scale of his or her forestry operations. Some Group Organizations might be structured to help in the development of such plans, and some would work with Group Members to implement the plan and to maintain records of related forestry operations.

6.C.3. Internal Monitoring

The Group Organization should conduct an internal monitoring program to ensure continuing conformance of management to the Standard. The program should include a checklist of items to monitor, a timetable for conducting monitoring, a process for identifying any non-conformances, and a Corrective Action Process for fixing problems.

If a non-conformance is identified, the Member will be expected to take appropriate action to submit (or approve) and implement a written Corrective Action Plan (CAP), and the Group Manager will work with the Group Member ensure that the problem is fixed and does not recur.

A persistent failure to appropriately implement a CAP could trigger the Member Expulsion Process outlined in Section 6.B, above.

6.C.4. Interest Group Coordination

The Group Organization may represent the Group with others to identify and manage special ecological and cultural resources, or to coordinate management activities with contract loggers or chemical applicators. The Group Organization might also work with interested local groups, non-governmental organizations, forest products companies, and other Group Organizations to coordinate land management planning and address any other areas of concerns.

6.C.5. Group Records

The Group Organization will identify and retain documents that pertain to the management of the Group's forests for purposes of management continuity, internal monitoring, or independent certification, including:

- 5) the names and particulars of Group Members;
- 6) maps or other depictions of the forest areas that are included in the Group;
- 7) the signed applications and consent forms from Group Members;
- 8) documentation of the pre-inspection audit;
- 9) documentation of internal monitoring and any corrective action; and
- 10) documentation of Member expulsion.

The Group Organization will retain all documents for a period of no less than five years. The Group Organization will provide the above-retained documents to the ATFS, its agents or assignees, as requested, and

will be made available for audit purposes.

6.C.6. Group Certification

In the process of a Group Certification, the Group Organization will select a qualified [Certification Body](#) to conduct an certification audit. In preparation for the audit, the Group Manager works with the lead auditor to develop an audit plan. The Group Manager coordinates field visits, helps schedule interviews, facilitates the inspections of documents, and otherwise ensures that the audit runs smoothly.

If the Certification Body sets any conditions for granting certification or calls for corrective action to address any non-conformances, the Group Manager ensures the terms of the conditions and/or corrective-action requirements are fully implemented.

Upon successful completion of an audit, the Group Organization retains the certificate of conformance on behalf of the Group Members. The Group may also want to work with the Certification Body to prepare a summary of the audit report for more general distribution and information. The Group is also responsible for engaging a certification body to complete any scheduled re-audit before the expiration of a previous certification.

Details regarding the Certification Process be found in the companion document entitled: “Group Certification Process: Auditing Procedures and Qualifications Criteria for Group Certification Bodies.”

6.D. Internal Dispute Resolution

There are a number of areas of possible internal disagreement over the Group Certification Process that may arise between Group Members, between Group Members and the Group Organization, and the Group Manager. The Group Organization will need an appropriate mechanism for handling and resolving any such internal disputes, including written documentation.

6.E. External Complaint Process

The Group Organization should have procedures for handling concerns or complaints submitted by external parties, including appropriate documentation.