



**NSF-ISR, LTD**  
**SURVEILLANCE AUDIT REPORT**

**A. Program Participant's Name:** Wisconsin DNR

**B. Operation(s) within the scope of SFIS Surveillance Audit:**

FRS: 1Y941 Madison, Wisconsin

**C. NSF Audit Team:**

Lead Auditor: Michael Ferrucci Auditor: Dr. Robert Hrubes

**D. Audit Date(s):** July 11-13, 2005

**E. Scope:**

☒ No Change

☐ Changed (see Section H, revised scope statement noted on FRS)

**F. Reference Documentation:**

2005-2009 SFI Standard®

Company SFI Documentation:

Date Revised: January, 2005

**G. Audit Results: Based on the results at this visit, the auditor concluded**

☐ Acceptable with no nonconformances; or

☒ Acceptable with minor nonconformances that should be corrected before the next regularly scheduled surveillance visit;

☐ Not acceptable with one or two major nonconformances - corrective action required;

☐ Several major nonconformances - the certification may be canceled unless immediate action is taken

Company Representative: \_\_\_\_\_ Robert Mather

Date: July 13, 2005

NSF-ISR Representative: \_\_\_\_\_ Mike Ferrucci

Date: July 13, 2005

This acknowledges the NSF-ISR Audit Team's visit to this location and the SFI Program Participant's receipt of this report and one new Corrective Action Request (CAR) form.

**H. Changes to Operations or to the SFI Standard**

Are there any significant changes in operations, procedures, specifications, FRS, etc. from the previous visit? ☒ Yes ☐ No

If yes, provide details of the changes: The 2005-2009 Sustainable Forestry Initiative Standard ® has been re-organized, and WI DNR procedures have kept pace with the required changes. This audit was conducted against the revised standard.

**I. Corrective Action Requests: (see Appendix IV)**

**Correct Action Requests Issued this visit:**

2005-06 Appropriate storage of chemicals

Previous CARs still open: One: 2003-04 Revisions to DNR Internal monitoring system

- ☐ Corrective Action Plan is not required.
- ☒ Corrective Action Plan is required within sixty days of this visit (for Minor Nonconformances).  
CARs will be verified during the next Surveillance Audit.
- ☐ Corrective Action Plan is required within thirty days of this visit (for Major Nonconformances).

The auditor will make arrangements to verify the corrective action has been effectively implemented. All major nonconformance(s) must be closed by the auditor prior to the next scheduled surveillance audit by a special verification visit or by desk review, if possible.

Any Corrective Action Plans should be mailed to:

Mike Ferrucci, President  
Interforest, LLC  
26 Commerce Drive  
North Branford, CT 06471  
Office & Mobile: 203-887-9248  
Fax: 203-488-2969  
mferrucci@iforest.com

At the conclusion of this Surveillance Audit visit, the following number of CARs remain open:

MAJOR(S) : 0

MINOR(S): 1

NO new Opportunities For Improvement (OFIs) were identified.

**Appendices:**

Appendix I: Surveillance Audit Schedule and Notification Letter  
Appendix II: Agreement to Not Consult and to Not Disclose  
Appendix III: Attendance Sheets  
Appendix IV: Corrective Action Requests  
Appendix V: Audit Matrix  
Appendix VI: Summary Surveillance Audit Report

## APPENDIX I



### Surveillance Notification Letter and Audit Schedule

#### Confirmation of SFI Standard Surveillance Audit

From: Mike Ferrucci [mailto:interforest@earthlink.net]  
Sent: Thursday, June 23, 2005 3:46 PM  
To: 'Pingrey, Paul E.'  
Subject: RE: WI State Forest Surveillance Audit Plan

Paul:

Thanks for the update and the "Schedule of Events". I like the schedule.

Do you have any e-versions of management plans for the forests we are visiting? Or other documents we may not have seen that provide good background reading. I'm looking for no more than 2-3 hours of advance reading material.

If they are not available electronically then paper copies would be nice, provided they don't amount to more than about a one-inch thick pile (we just can't carry too much paper!).

If paper-only copies are available and they are large please have them ready for us on July 11 in your offices.

Mike Ferrucci

Wisconsin State Forest Certification

## 2005 FSC and SFI Annual Surveillance Audit

### *Schedule of Events*

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#### Monday July 11<sup>th</sup>, 2005

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**8:30am – 12:00**

**Madison, DNR Office  
Room 774B – Board Room**

Review of WDNR's response and actions to complete Corrective Actions.

Mike Ferrucci, Robert Hrubes, Bob Mather, Paul Pingrey, Teague Prichard, Jim Warren, Jeff Barkley, Randy Hoffman, Tom Watkins, Carmen Wagner, Jeff Prey

**11:00 -12:00** Exit Summary with Forestry Leadership (Tim Mulhern, Paul DeLong, Darrel Zastrow, Wendy McCown, Trent Marty, Bob Mather)

**12:00 – 1:00 pm** Lunch, Madison, Reservations at Great Dane

**1:00 - 3:00 pm** Travel to Kettle Moraine State Forest Northern Unit, Campbellsport, WI (53010)

**3:00 - 5:00 pm**

**Camblesport, KMSF NU Office  
N1765 County Highway G Campbellsport WI 53010**

**Office visit with NU KMSF staff**

Tim Beyer, Jerry Leiterman, Frank Trcka, Greg Pilarski, Paul Pingrey, Teague Prichard, Jim Warren, Bob Mather, Robert Hrubes, Mike Ferrucci, Julie Peltier, Jason Quast, Dale Katsma, Carmen Wagner, Pat Robinson, Owen Boyle

Overnight Clairemont Hotel in West Bend (15 minutes from the state forest to the south) 262-338-0636 (Mather, Prichard, Pingrey, Warren, Wagner, Hrubes, Ferrucci)

#### Tuesday July 12<sup>th</sup>, 2005

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**8:00am - 11:30**

**KMSF NU**

**Field visit of KMSF**

Tim Beyer, Jerry Leiterman, Frank Trcka, Paul Pingrey, Teague Prichard, Jim Warren, Bob Mather, Robert Hrubes, Mike Ferrucci, Julie Peltier, Jason Quast, Dale Katsma, Carmen Wagner, Owen Boyle, Pat Robinson

**11:30 -1:00 pm** Lunch and Travel to Two Rivers, WI (54241)

**1:00 - 5:00 pm**

**Field visit of Point Beach State Forest**

Paul Pingrey, Teague Prichard, Jim Warren, Bob Mather, Robert Hrubes, Mike Ferrucci, Ron Jones, Guy Willman, Sue Crowley, Carmen Wagner, Jean Rombeck-Bartels, Pat Robinson, Victoria Dirst, Jeff Pritzl, Arnie Lindauer, Jeff Pritzl

**5:00 - 6:00 pm** Travel to Green Bay

**6:00 pm** Dinner at Lambeau Field - Curly's

Overnight in Green Bay

Comfort Suites (920) 497-4701 1951 Bond St Green Bay, WI 54303 (Mather, Prichard, Pingrey, Warren, Wagner, Hrubes, Ferrucci)

**7:00 – 8:15 am** Travel to Crivitz, WI (54114)

**8:15 -9:00 am Peshtigo River State Forest Headquarters**

Office discussion

John Lubbers, Dan Mertz, Aaron Buckholz, Pat Robinson, Magie Kailhofer, Robert Hrubes, Mike Ferrucci, Paul Pingrey, Teague Prichard, Jim Warren, Bob Mather, Carmen Wagner

**9:00 - 12:30 pm** Field visit and lunch

**1:00 - 3:00 pm** Exit interview (Peshtigo Forest Headquarters)

Robert Hrubes, Mike Ferrucci, Paul Pingrey, Teague Prichard, Jim Warren, Bob Mather, Carmen Wagner

## APPENDIX II



### Agreement to Not Consult and to Not Disclose

**AGREEMENT TO NOT DISCLOSE AND TO NOT CONSULT**



**IN CONSIDERATION** of my appointment to represent NSF International Strategic Registrations, Ltd. (NSF-ISR) and conduct management systems audits of the documentation, operations, and facilities of: Wisconsin DNR State Forests (FRS 1Y941)  
101 South Webster Street, PO Box 7921 Madison, WI 53707  
(hereinafter called "NSF-ISR's Client") for registration by NSF-ISR, I agree as follows:

1. I will not at any time during or subsequent to this agreement disclose or use in any way any information or knowledge or data I receive or develop while providing service for NSF-ISR, including but not limited to, plans, lists, prospects lists, and trade secrets of NSF-ISR or its client.
2. While representing NSF-ISR, I may have access to confidential business information from NSF-ISR's client and others, and may be authorized to handle this information in the performance of my responsibilities. I can assume that this is proprietary information to the client or parties supplying it, and agree it may not be revealed by me to others outside NSF-ISR. I agree to maintain this information in a secure manner that prevents any accidental disclosure. Unauthorized disclosure or handling of confidential business information may result in disciplinary action, including but not limited to cancellation of my appointment to represent NSF-ISR. Should my authorization to handle confidential information be revoked while I am appointed to represent NSF-ISR, or as a result of cancellation of my appointment to represent NSF-ISR, I understand that my obligation not to reveal confidential business information will still be in force.
3. Upon cancellation of my appointment to represent NSF-ISR for any reason, I agree to promptly deliver to NSF-ISR all physical property, plans, designs, computer programs, computer lists, prospect lists, records, letters, notes, reports, and all other materials relating to NSF-ISR or its client in my possession or under my control.
4. I hereby attest that I have not provided consultation or other services related to the SFI program or management system to NSF-ISR's client for at least two years, and to preclude any actual or perceived conflict of interest, I agree to not enter into any agreement, provide consultation or other services to NSF-ISR's client (for whom I participated in any audit) except for services under this agreement, for a period of two years after completion of services under this agreement. Certification or auditing under a recognized standard is not subject to the above prohibitions.
5. I shall not participate in an appraisal or advise a potential purchaser or broker a purchase of property audited within the prior three years without the written permission of the audited party. I shall notify the audited party of participation in such activities after the three-year period immediately upon initiation of such activities for a period of at least 10 years following the audit. I shall disclose to the party requesting this audit any prior land appraisal or assessment work or land brokerage activity I or my employers has conducted related to the property to be audited.

(signed copy on file at NSF)

Signature

Michael Ferrucci

July 10, 2005

**AGREEMENT TO NOT DISCLOSE AND TO NOT CONSULT**



**IN CONSIDERATION** of my appointment to represent NSF International Strategic Registrations, Ltd. (NSF-ISR) and conduct management systems audits of the documentation, operations, and facilities of: Wisconsin DNR State Forests (FRS 1Y941)  
101 South Webster Street, PO Box 7921 Madison, WI 53707  
(hereinafter called "NSF-ISR's Client") for registration by NSF-ISR, I agree as follows:

1. I will not at any time during or subsequent to this agreement disclose or use in any way any information or knowledge or data I receive or develop while providing service for NSF-ISR, including but not limited to, plans, lists, prospects lists, and trade secrets of NSF-ISR or its client.
2. While representing NSF-ISR, I may have access to confidential business information from NSF-ISR's client and others, and may be authorized to handle this information in the performance of my responsibilities. I can assume that this is proprietary information to the client or parties supplying it, and agree it may not be revealed by me to others outside NSF-ISR. I agree to maintain this information in a secure manner that prevents any accidental disclosure. Unauthorized disclosure or handling of confidential business information may result in disciplinary action, including but not limited to cancellation of my appointment to represent NSF-ISR. Should my authorization to handle confidential information be revoked while I am appointed to represent NSF-ISR, or as a result of cancellation of my appointment to represent NSF-ISR, I understand that my obligation not to reveal confidential business information will still be in force.
3. Upon cancellation of my appointment to represent NSF-ISR for any reason, I agree to promptly deliver to NSF-ISR all physical property, plans, designs, computer programs, computer lists, prospect lists, records, letters, notes, reports, and all other materials relating to NSF-ISR or its client in my possession or under my control.
4. I hereby attest that I have not provided consultation or other services related to the SFI program or management system to NSF-ISR's client for at least two years, and to preclude any actual or perceived conflict of interest, I agree to not enter into any agreement, provide consultation or other services to NSF-ISR's client (for whom I participated in any audit) except for services under this agreement, for a period of two years after completion of services under this agreement. Certification or auditing under a recognized standard is not subject to the above prohibitions.
5. I shall not participate in an appraisal or advise a potential purchaser or broker a purchase of property audited within the prior three years without the written permission of the audited party. I shall notify the audited party of participation in such activities after the three-year period immediately upon initiation of such activities for a period of at least 10 years following the audit. I shall disclose to the party requesting this audit any prior land appraisal or assessment work or land brokerage activity I or my employers has conducted related to the property to be audited.

(signed copy on file at NSF)

Signature

Robert Hrubes

July 13, 2005



## APPENDIX III



### SFI AUDIT ATTENDANCE SHEET

COMPANY NAME: Wisconsin DNR

LOCATION: Wisconsin DNR State Forests (FRS 1Y941), 101 South Webster Street, PO Box 7921 Madison, WI 53707

OPENING MEETING DATE: July 11, 2005

CLOSING MEETING DATE: July 13, 2005

NAME	TITLE/POSITION	OPENING MEETING	CLOSING MEETING
Mike Ferrucci	NSF-ISR Lead Auditor, FSC Auditor	X	X
Dr. Robert Hrubes	SFI Auditor, FSC Lead	X	X
Jim Warren	Chief, Forest Lands Section DNR	X	
Carmen Wagner	Forest Hydrologist, DNR	X	X
Teague Prichard	State Forest Specialist	X	X
Bob Mather	Director, Forest Management	X	X
Jeff Barkley	Count Forest / Public Lands Specialist	X	
Jeff Prey	Planner, Parks and Recreation	X	
Tom Watkins	Planner, Facilities and Lands	X	
Paul Pingrey	Forest Certification Specialist	X	X
Darrel Zastrow	Director, Office of Forest Sciences	X	
Joe Kovach	Forest Ecologist, Silviculturalist		X
John Lubbers	NER Forestry Staff Supervisor		X
Steve Kaufman	Peshtigo River State Forest LTE		X
Maggie Kalhofer	Governor Thompson State Park Manager		X
Sara Pearson	Peshtigo River SF Ranger, Ast. Manager		X
Dan Mertz	Peshtigo River State Forest, Manager		X

## APPENDIX IV



### Corrective Action Requests

### Corrective And Preventive Action Request (CAR)

Company/Location: <u>Wisconsin DNR, Madison, WI</u> Auditor: <u>Mike Ferrucci</u> Location of Finding: <u>Office, Madison WI</u> Discussed with: <u>WI DNR Audit Team</u>	Date: <u>12-02-03</u> <b>FRS # <u>1Y941</u></b> Finding Number: <u>same</u> CAR Number: <u>ORR-2003-01 revised</u> Previous CAR Number/Date: <u>ORR-2003-01 / 10-17-03</u>
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**AUDITOR FINDING:** Standard Number and Clause: 4.1.1.1.1 CI1 & 3; 4.1.2.1.1 CI1; 4.1.3.1.1 CI1; 4.1.5.1.2 CI1; 4.2.1.1.2 CI1; 4.2.1.1.4 CI1 (all relating to policies).

(NSF-ISR Policy or Company procedure, if applicable)

Policies are not specific to all relevant SFI Objectives or Performance Measures including: general SFI policies and assignment of SFI roles and responsibilities (4.1.1.1.1 CI1 & 3); Policy on time frame for reforestation (4.1.2.1.1 CI1); Policy on BMP use for all phases of operations (4.1.3.1.1 CI1); Policy to report on clearcut size and number (4.1.5.1.2 CI1); Policy to support training of loggers (4.2.1.1.2 CI1); and Policy to promote the use of trained professionals (4.2.1.1.4 CI1).

Major Nonconformity

**Minor Nonconformity**

**Company Representative's Signature:** (Note: Copy signed by Robert Mather, WIDNR, is on file at NSF.) \_\_\_\_\_

**IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:**

**1) ROOT CAUSE ANALYSIS BY COMPANY** – Include potential causes and assurance that problem does not exist in other areas.

While it is understood that the WIDNR Division of Forestry is implementing and achieving many of the SFIS Objectives and Performance Measures, there has been, to date, no need to have written policy to that effect. Similarly staff roles and responsibilities have not been identified and communicated since the Division is just now pursuing SFI Certification.

**2) CORRECTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

The Division of Forestry will immediately apply to the AF&PA for SFI program participation. If accepted, the Division of Forestry will sign the license agreement upon the approval of the Wisconsin Natural Resources Board (NRB). The NRB resolution will confirm the Department's commitment to follow the 2002-2004 SFI Standard® policies, objectives and performance measures. Within six months of certification, the WIDNR Division of Forestry will develop and implement a State Forest handbook revision to clarify policy issues concerning reforestation, BMP use for operations, clear cut size and number, training loggers and promoting the use of trained professionals. The Division will update and incorporate staff roles and responsibilities for SFIS Objectives within the Division's consistency plan. In addition, the Forestry Division Leadership Team will work with The Regional Forestry Leaders to ensure that roles and responsibilities identified in the consistency plan are included in annual work plans, understood, implemented and reported. Long term, the Division will also seek an additional staff person to lead and coordinate efforts within a forest certification program through a 2005-2007 Budget Initiative.

**3) PREVENTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

The Division, through the Forestry Leadership Team, will annually review the sustainable forestry policies as detailed in the State Forest handbook and the consistency plan and look for opportunities for improvement or adjustments to stay in line with SFI standards. Continually update staff work plans to further define roles and responsibilities. Provide initial SFI Program training to the State Forest staff during the fall 2004 all State Forest staff meeting. Preventive action will be continual and ongoing.

**Company Representative's Signature:** (Note: Copy signed by Robert Mather, WIDNR, is on file at NSF.) Date: \_\_\_\_\_

**AUDITOR REVIEW OF COMPANY'S PLAN:**

Comments: Plan meets identified issues, and will be reviewed during Surveillance Audit. Resolution of Natural Resource Board (see CAR ORR-2003-02) links to this CAR.

STATUS: Plan Accepted AUDITOR/DATE: Mike Ferrucci 2-18-04

**AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:**

Comments: The required policy statements have been adopted and placed within appropriate manual codes.

STATUS: Closed AUDITOR/DATE: Mike Ferrucci 7-13-05

**LEGEND:** OPEN = CA Plan Accepted **CLOSED** = CA implemented, verified & accepted **REJECTED** = C/A Plan or Implementation rejected

### Corrective And Preventive Action Request (CAR)

Company/Location: <u>Wisconsin DNR, Madison, WI</u> Auditor: <u>Mike Ferrucci</u> Location of Finding: <u>Office, Madison WI</u> Discussed with: <u>WI DNR Audit Team</u>	Date: <u>10-17-03</u> <b>FRS # <u>1Y941</u></b> Finding Number: <u>same</u> CAR Number: <u>ORR-2003-02</u> Previous CAR Number/Date: _____
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**AUDITOR FINDING:** Standard Number and Clause: 4.2.1.1.5 Communication of SFI Commitment  
 (NSF-ISR Policy or Company procedure, if applicable) CI #1 is not fully implemented. There is currently no policy of commitment to the SFIS (see ORR-2003-01) so there is no communication.

Major Nonconformity **Minor Nonconformity**

**Company Representative's Signature:** (Note: Copy signed by Robert Mather, WIDNR, is on file at NSF.) \_\_\_\_\_

**IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:**

**1) ROOT CAUSE ANALYSIS BY COMPANY** – Include potential causes and assurance that problem does not exist in other areas.  
Since the Wisconsin DNR hasn't yet committed to SFI certification, there has been no policy to communicate.  
 \_\_\_\_\_  
 \_\_\_\_\_

**2) CORRECTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.  
Wisconsin DNR will present a resolution for adoption by the Natural Resources Board recognizing the Department's commitment to the SFIS. The policy would be documented in the appropriate DNR Manual Code Handbooks and communicated to Department staff, partners and stakeholders by memoranda and news releases. The Forestry Leadership Team would deal with the policy as an action item. Training will be provided to staff members to explain the Department's commitment to forest certification and their roles in implementing the program.  
 \_\_\_\_\_

**3) PREVENTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.  
Communication of SFIS principles will be included as a topic for the Regional program reviews, which are completed across the state in a three-year cycle.  
 \_\_\_\_\_

**Company Representative's Signature:** (Note: Copy signed by Robert Mather, WIDNR, is on file at NSF.)    Date: \_\_\_\_\_

**AUDITOR REVIEW OF COMPANY'S PLAN:**  
 Comments: Plan meets identified Minor non-conformance; also helps with ORR-2003-01  
 \_\_\_\_\_

STATUS: Plan Accepted      AUDITOR/DATE: Mike Ferrucci 1-26-04

**AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:**  
 Comments: Reviewed an extensive list of accomplishments provided by WI DNR on 7-11-05 which goes well beyond the CAR plan. Confirmed conformance through interviews and review of documents.  
 \_\_\_\_\_

STATUS: Closed      AUDITOR/DATE: Mike Ferrucci, 7-11-05

**LEGEND FOR STATUS:** OPEN = CA Plan Accepted; **CLOSED** = CA implemented, verified & accepted **REJECTED** = C/A Plan or Implementation rejected

### Corrective And Preventive Action Request (CAR)

Company/Location: <u>Wisconsin DNR, Madison, WI</u>	Date: <u>10-17-03</u> <b>FRS # <u>1Y941</u></b>
Auditor: <u>Mike Ferrucci</u>	Finding Number: <u>same</u>
Location of Finding: <u>Office, Madison WI</u>	CAR Number: <u>ORR-2003-03</u>
Discussed with: <u>WI DNR Audit Team</u>	Previous CAR Number/Date: _____

**AUDITOR FINDING:** Standard Number and Clause: 4.3.1.1.1 CI #2 "Report annually"

(NSF-ISR Policy or Company procedure, if applicable) There are currently no past surveys that have been completed as WI DNR is a new Program Participant. WI DNR does many other "non-SFI" activities to report on their progress in "fulfilling their commitment to sustainable forestry".

Major Nonconformity

**Minor Nonconformity**

**Company Representative's Signature:** (Note: Copy signed by Robert Mather, WIDNR, is on file at NSF.) \_\_\_\_\_

**IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:**

**1) ROOT CAUSE ANALYSIS BY COMPANY** – Include potential causes and assurance that problem does not exist in other areas.

Wisconsin DNR has not previously been certified by SFI, consequently we have not completed the annual SFI survey questionnaire for the State Forests.

**2) CORRECTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

The WDNR Division of Forestry will pursue development and implementation of a MOU between the Division and the Sustainable Forestry Board. The MOU will outline the Division's commitment to SFI, including the agreement to promptly complete and respond to the annual SFI survey for our State Forests. The MOU will be completed within one year's time.

**3) PREVENTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

If the decision is made to follow through with SFI certification, WDNR will complete the corrective action listed above.

**Company Representative's Signature:** (Note: Copy signed by Robert Mather, WIDNR, is on file at NSF.) Date: 01-16-04

**AUDITOR REVIEW OF COMPANY'S PLAN:**

Comments: Minor programmatic issue easily resolved by proposed actions.

STATUS: Plan Accepted AUDITOR/DATE: Mike Ferrucci 1-26-04

**AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:**

Comments: MOU / License Agreement signed. SFI 2004 Annual Survey completed and submitted.

STATUS: Closed AUDITOR/DATE: Mike Ferrucci, 7-12-05

**LEGEND FOR STATUS:** OPEN = CA Plan Accepted; CLOSED = CA implemented, verified & accepted **REJECTED** = C/A Plan or Implementation rejected

### Corrective And Preventive Action Request (CAR)

Company/Location: <u>Wisconsin DNR, Madison, WI</u>	Date: <u>10-17-03</u> <b>FRS # <u>1Y941</u></b>
Auditor: <u>Mike Ferrucci</u>	Finding Number: <u>same</u>
Location of Finding: <u>Office, Madison WI</u>	CAR Number: <u>ORR-2003-04</u>
Discussed with: <u>WI DNR Audit Team</u>	Previous CAR Number/Date: _____

**AUDITOR FINDING:** Standard Number and Clause: 4.4.4.1.1 CI#2 and CI #3

(NSF-ISR Policy or Company procedure, if applicable) WI DNR has a fully functioning management system that includes and drives "Continual Improvement". This system does not currently include "SFI Objectives & Performance Measures " nor "continuing SFI conformance".

Major Nonconformity

**Minor Nonconformity**

**Company Representative's Signature:** (Note: Copy signed by Robert Mather, WIDNR, is on file at NSF.) \_\_\_\_\_

**IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:**

**1) ROOT CAUSE ANALYSIS BY COMPANY** – Include potential causes and assurance that problem does not exist in other areas.

Since the Wisconsin DNR hasn't yet committed to SFI certification, there has been no reason to incorporate it in the management system.

**2) CORRECTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

Within the first year of committing to SFI certification, the Department will adapt its internal monitoring system to include SFI Objectives and Performance Measures and continuing SFI conformance. The procedures will assure that the appropriate technical specialists (wildlife biologists, BMP specialists, etc.) are included on the State Forest audit teams. Currently, State Forest audits are required in any year that harvests exceed \$100,000 in value (which includes most of the properties), but two years is the longest cycle.

**3) PREVENTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

The policy to include SFI conformance in the State Forest audits will be added to the Operations Handbook.

**Company Representative's Signature:** (Note: Copy signed by Robert Mather, WIDNR, is on file at NSF.) Date: \_\_\_\_\_

**AUDITOR REVIEW OF COMPANY'S PLAN:**

Comments: Plan covers identified minor non-conformance; linkage into ongoing management review is critical.

STATUS: Plan Accepted

AUDITOR/DATE: Mike Ferrucci 1-26-04

**AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:**

Comments: Most actions completed, but internal monitoring system adaptations are not implemented. SFI conformance is currently closely reviewed by central office staff, including ad hoc "certification specialist".

STATUS: Closed AUDITOR/DATE: Mike Ferrucci, 7-13-05

**LEGEND FOR STATUS:** OPEN = CA Plan Accepted; CLOSED = CA implemented, verified & accepted **REJECTED** = C/A Plan or Implementation rejected

### Corrective And Preventive Action Request (CAR)

Company/Location: <u>Wisconsin DNR, Madison, WI</u> Auditor: <u>Mike Ferrucci</u> Location of Finding: <u>Flambeau River State Forest Sale 585</u> Discussed with: <u>WI DNR Audit Team</u>	Date: <u>11-12-03</u> <b>FRS # 1Y941</b> Finding Number: <u>same</u> CAR Number: <u>RA-2003-05</u> Previous CAR Number/Date: _____
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**AUDITOR FINDING:** Standard Number and Clause: 4.1.2.1.4- CI 4 & 4.1.3.1.1 P.M. and CI 1

(NSF-ISR Policy or Company procedure, if applicable) At FRSF Sale 585 the portion of the access road owned by Wisconsin is rutted, eroding, and being abused by uncontrolled access by recreational users, exacerbated by use during an active logging job. The definition for a permanent all-season forest road applies, as there is no closure. This road bisects a depression wetland. The road does not have BMP recommended drainage or surface: BMP Manual provisions, page 29: “surface the road with gravel where steep grades, erodible soils, or high traffic volume make the potential for surface erosion significant” ; and drainage structures “where necessary to protect water quality, install road drainage structures to remove storm water or seepage from the road surface...”. 4.1.3.1.1 CI 1 “Written policy to implement state BMPs during all phases of management activities.” is not in place.

Major Nonconformity **Minor Nonconformity**

**Company Representative’s Signature:** (Note: Copy signed by Robert Mather, WIDNR, is on file at NSF.)

**IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:**

**1) ROOT CAUSE ANALYSIS BY COMPANY** – Include potential causes and assurance that problem does not exist in other areas.

This particular road has a long-term history of use by recreational enthusiasts. In previous years more funding was available to address maintenance needs and efforts were made to close the road to public use. The public reacted very negatively to this proposal and applied political pressure to keep the road open. Later, funding for maintenance projects on the state forests were eliminated by state budget cuts.

**2) CORRECTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

Within one year, funding from operational funds will be identified to pay for the critical maintenance activities on this road. In addition, the FRSF will explore opportunities to reshape this particular access road, reroute portions of the road, reinstall water diversion structures, and surface a portion of the road with gravel later this year if current funding and staffing resources are available. The Division will assist the FRSF with arranging for funds necessary to support the expense to reshape and surface year round roads. The FRSF will attempt to review existing road inventory and establish a maintenance rotation to review and to repair year round season roads. The Division will arrange for a road BMP training session for State Forest managers to reinforce BMP standards and share road development practices.

The long-term plan to address roads is to restore and seek funding for maintenance projects on state forests through a 2005-07 Budget Initiative.

**3) PREVENTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

We are currently in the process of monitoring the implementation and effectiveness of all BMPs on state forests to assess BMP performance across state forests. We specifically have contracted with a private vendor who is in the process of monitoring 28 randomly selected sites. This monitoring approach will identify state forest BMP concerns.

The issue of public access will continue to be addressed through the Master Planning process. The Master Plan for the Flambeau River State Forest is scheduled to be rewritten in the next five years. The condition of haul roads will be watched and areas of concern will be addressed as needed. The next Master Plan will include a section on Access planning and control of motorized vehicles. Development of this Plan is 3-5 years down the road. This Access Management Plan will include public involvement with protecting water quality while still providing recreational opportunities for the general public. Additional long-term efforts include developing a state forest based road inventory system that establishes a maintenance rotation to review, maintain and repair the state forest road infrastructure. As previously mentioned, funding will be requested in the 2005-2007 biennium.

**Company Representative's Signature:** (Note: Copy signed by Robert Mather, WIDNR, is on file at NSF.) Date: \_\_\_\_\_

**AUDITOR REVIEW OF COMPANY'S PLAN:**

Comments: In 2004 Annual Audit the road repairs were inspected and found to be exceptionally well-done! Amount of increased funding, fully documented, will influence the need for on-site visits to confirm corrective actions.

STATUS: Plan Accepted AUDITOR/DATE: Mike Ferrucci 1-26-04

**AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:**

Comments: Road funding provided by WI Legislature. Road planning and overall planning documented.

STATUS: Closed AUDITOR/DATE: Mike Ferrucci 7-13-05

**LEGEND FOR STATUS:** OPEN = CA Plan Accepted; CLOSED = CA implemented, verified & accepted REJECTED = C/A Plan or Implementation rejected



### Corrective and Preventive Action Request (CAR)

Company/Location: <u>Wisconsin DNR, Madison, WI</u> Auditor: <u>Mike Ferrucci</u> Location of Finding: <u>Point Beach State Forest</u> Discussed with: <u>Supt. &amp; WI DNR Audit Team</u>	Date: <u>7/12/05</u> <b>FRS # 11941</b> CAR Number: <u>2005-06</u> Previous CAR Number/Date: <u>None</u> Nonconformance Type (underline):    Major            Minor
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**AUDITOR FINDING:** Standard Number and Clause: 2005-2009 Sustainable Forestry Initiative Standard @ 2.2.6 i  
 Description: Appropriate storage of chemicals: Pesticides at PBSF (Round-up, Garlon, Accord) were found not to be stored in locked storage cabinet, which is required by chemical BMPs and DNR procedure.

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**IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:**

**1) ROOT CAUSE ANALYSIS BY COMPANY**—Include potential causes & assurance problem does not exist in other areas.

SEE ATTACHED REPORT NEXT PAGE

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**2) CORRECTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

SEE ATTACHED REPORT NEXT PAGE

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**3) PREVENTIVE ACTION BY COMPANY** – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.

SEE ATTACHED REPORT NEXT PAGE

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**AUDITOR REVIEW OF COMPANY'S PLAN:**  
The proposed plan is comprehensive and should address the issue quickly and thoroughly. Most aspects of action are already implemented, but will be assessed at next S.A.

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STATUS: Open (plan accepted)                      AUDITOR/DATE: M. Ferrucci 7/21/05

**AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:**

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STATUS: \_\_\_\_\_ AUDITOR/DATE: \_\_\_\_\_

**STATUS LEGEND:** **OPEN** = CA Plan Accepted **CLOSED** = CA implemented, verified & accepted **REJECTED** = C/A Plan or Implementation rejected



# Wisconsin State Forest Certification

FSC #SCS-FM/COC-0007N

SFI #NSF-SFIS-1Y941-S1

## ***Corrective Action Plan and Accomplishments***

**SFI CAR 2005.5**

**FSC CAR 2005.10**

**CAR identified at the July 2005 Annual Surveillance Audit**

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**Summary of Corrective Action Request:** (general interpretation) Take immediate action to ensure the proper storage of chemicals at Point Beach State Forest. Assess the need to take necessary actions to ensure the proper storage of chemicals, as identified in the Department's manual code, are being implemented and monitored.

### **Planned Actions:**

Within 5 days, correct the improper storage of chemicals at Point Beach State Forest. Specifically review, inspect and enforce the Department's policy on the proper storage of chemicals, including required storage unit, location (proximity to food and worker break room) and proper ventilation. Assess the need to communicate the Departments policy to all State Forest staff on proper use and storage of chemicals.

### **Accomplishments:**

1.) Reviewed the most recent safety inspection at Point Beach State Forest dated November 2004. Storage of chemicals (including herbicides) was not identified as an issue needing attention. All chemicals were reported as being stored properly.



Point Beach Safety  
Review.doc ...

*Enclosed: November 2004 Point Beach Safety Inspection Review.*

2.) Mary Ginnebaugh, DNR Regional Safety Coordinator, conducted an on-site safety inspection of Point Beach State Forest on July 18, 2005. The safety inspection focused on the proper storage of chemicals, including the storage unit, the location and proximity to the worker break room, and proper ventilation. In brief, all of the plastic jugs containing pesticides or herbicides were noted to be properly stored inside the cabinet. Only empty cans and empty spray containers were stored on top of the cabinet. The inspection did make a number of recommendations to improve the work environment and area but immediate action was not required by the safety inspector.

### **Specific Actions Taken within 5 days and actions taken to ensure ongoing compliance**

- The Department's Regional Safety Coordinator distributed and verbally communicated the Department's policy and procedures for proper storage of chemicals to all staff involved in the forests operations.
- Point Beach staff reviewed the procedures, corrected the problem by placing all chemicals in an appropriate cabinet.



Pt Beach Follow-up  
Site Visit....

*Enclosed: July 2005 Point Beach State Forest Safety Review*

3.) Communicated the Department's existing policy and procedures for the proper storage of chemicals on state forest properties. State Forest Specialist, Teague Prichard, sent a memo to all state forest superintendents and regional supervisors communicating the existing policy and manual codes for proper use and storage of chemicals.



*Enclosed: Memo and Hazardous Materials manual code, 4221.1*

## APPENDIX V



## Audit Matrix

## APPENDIX VI



### SFI Surveillance Audit Summary

The SFI Program of the Wisconsin DNR State Forests has demonstrated continuing conformance with the Sustainable Forestry Initiative Standard®, 2005-2009 Edition (SFIS), according to the NSF-ISR SFIS Certification Audit Process.

NSF-ISR initially certified the Wisconsin State Forest System to the SFIS on May 5, 2004. This report describes the second follow-up Surveillance Audit designed to focus on changes in the standard, changes in operations, the management review system, and efforts at continuous improvement. In addition, a subset of SFI requirements were selected for detailed review.

The SFI Certification Audit was performed on sustainable forestry activities of the Wisconsin DNR and land management operations on Wisconsin State Forests encompassing over 490,000 acres of publicly owned forests, including the following properties:

Black River State Forest	Kettle Moraine- Northern and Southern Units
Brule River	Northern Highland/American Legion
Coulee Experimental	Peshtigo River
Flambeau River	Point Beach
Governor Knowles	

The surveillance audit was performed by NSF-ISR on July 11-13, 2005 by an audit team including Michael Ferrucci, Lead Auditor and Dr. Robert Hrubes. Audit team members fulfill the qualification criteria for conducting SFIS Certification Audits contained in the Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ).

The objective of the audit was to assess continuing conformance of the firm's SFI Program to the requirements of the Sustainable Forestry Initiative® Standard, 2005-2009 Edition. Forest practices that were the focus of field inspections included those that have been conducted since the previous field audit conducted during October of 2003. In addition, a subset of SFI obligations to promote sustainable forestry practices, to ensure the smooth functioning of the SFI program on Wisconsin's State Forests and to incorporate continual improvement systems were reexamined during the audit.

The Indicators and Performance Measures of the 2005-2009 Sustainable Forestry Initiative Standard® were utilized without modification or substitution. As with the initial certification, SFI Performance Measures and indicators involving wood procurement (Objective 8) were outside of the scope of the Wisconsin DNR's SFI program and were excluded from the scope of the SFI Certification Audit.

## **SFIS Surveillance Audit Process**

The review was governed by a detailed audit protocol designed to enable the audit team determine conformance with the applicable SFI requirements. The process included the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices. A selection of documents describing these activities were provided to the auditors in advance, and a sample of the available audit evidence was designated by the auditor for review.

The possible findings for specific SFI requirements included Full Conformance, Major Non-conformance, Minor Non-conformance, Opportunities for Improvement, and Practices that exceeded the Basic Requirements of the SFIS. Surveillance Audits generally focus on conformance issues and do not generally address exceptional practices.

## **Overview of Audit Findings**

Wisconsin DNR's SFI Program was found to be in full conformance with the SFIS Standard. In 2003 the NSF-ISR SFI Certification Audit Process determined that there were five minor non-conformances. Since then, the WI DNR Bureau of Forest Management developed and implemented plans to address these issues. The audit team reviewed all previous minor non-conformances and corrective action plans implemented by Wisconsin DNR and closed four of five issue areas as follows:

1. CAR 2003-01 SFI and related policies are in place - Closed
2. CAR 2003-02 SFI commitment is fully communicated - Closed
3. CAR 2003-03 SFI annual survey completed - Closed
4. CAR 2003-04 Internal SFI monitoring program is implemented - Closed
5. CAR 2003-05 Road maintenance program improved - Closed

The NSF-ISR SFI Certification Audit Process determined that there was one new minor non-conformance, "CAR 2005-06" which involved the improper storage of pesticides at one field site. Staff at that location immediately corrected the problem, and the department has prepared a plan to prevent similar events. Progress in implementing the remaining open corrective action plan will be reviewed in subsequent surveillance audits.

The Department of Natural Resources has already improved its SFI Program in response to the previously identified opportunities for improvement, including:

- Increased emphasis on timely inventory updates in the recon system;
- Criteria for "excessive" rutting is under development;
- Improved record-keeping for training, particularly certification-related training; and
- Strengthened policy to encourage logger BMP training.

Wisconsin DNR has also improved its sustainable forestry program as follows:

- Modified timber sale contracts to include safety and labor relations compliance;
- Developed a program for review and analysis of all state forest roads;
- Training and staff assignments relating to SFI have been strengthened;
- Master Planning has been improved and streamlined; and
- A forest hydrologist has been hired.

The Wisconsin DNR demonstrated that it exceeds the SFI Standard in the following areas:

- Providing biodiversity conservation information for family forest owners - The DNR's publications and web site are comprehensive and of the highest quality;
- Providing recreation opportunities for the public - The recreational and educational programs and facilities on state forests are very well designed and maintained, with recreational use a priority in many locations.
- Providing opportunities for local stakeholders contact over forest management issues - DNR's efforts to involve and inform the public regarding management programs are strong and steadily expanding through use of the web, mailings, and newsletters.

The next surveillance audit is scheduled for the fall of 2006.