



## **2018 SFI Public Summary Report**

### **Fruit Growers Supply Company Sustainable Forestry Initiative® (SFI) Forest Management Standard [2015-2019]**

**Date: February 28, 2019**

#### **Project Scope and Objectives**

PricewaterhouseCoopers LLP (“PwC”) completed a multi-site Maintenance Assessment on Fruit Growers Supply Company’s (“Fruit Growers”, “FGS” or “the Company”) Forest Management activities in North America for the central office in Hilt, California, and timberlands in California, Oregon and Washington States. The Lead Assessor was James Lucas, EMS (LA) and the on-site team lead was Sean Pledger, PwC Assessor. The audit team was accompanied by Fruit Growers’ SFI Representative, Jay Powell. The 2018 assessment focused on the Oregon (Wiley and Wards Butte) and Washington (Hoh Forest) lands. PwC uses a rotational audit approach where the central office functions are audited annually and the lands are sampled on a 3 year rotating schedule that conforms to the International Accreditation Forum Inc.’s Mandatory Document 1.

The primary objective of the assessment was to assess the Company’s SFI management system and to evaluate the Company’s implementation of the SFI Standard in the field. There have been no changes to the scope of the multi-site certification since the last public summary.

#### **Client Profile**

Fruit Growers Supply Company is an agricultural services provider that was established in 1907 by the same growers that formed the Sunkist Marketing Cooperative. They were created in order to supply wood for Sunkist’s crates and are the oldest non-profit supply cooperative in the nation. They have grown their vertically integrated business alongside the West Coast’s citrus production.

Fruit Growers is a multi-site organization with a central office in Hilt, California and two other regional offices in Burney, California, and Montesano Washington. Fruit Growers manages timberlands in California (276,757 acres), Oregon (16,672 acres) and Washington (23,502 acres). The California timberlands are a mixed coniferous type with the majority species being Ponderosa Pine, White Fire, and Douglas-Fir. The Oregon and Washington timberlands are mainly Douglas-Fir and Western Hemlock.

#### **Indicators**

All of the indicators in the SFI Forest Management Standard were within the scope of the assessment, except for performance measure 8.2 within Objective 8 and Objective 13, since none of the land managed by the Company is public land. There were no substitute indicators.

**Assessment Process**

On August 8<sup>th</sup> & 9<sup>th</sup>, 2018, the assessment team conducted field assessments of the Wards Butte and Wiley properties in Oregon, and across the Hoh Forest in Washington State. On August 10<sup>th</sup>, 2018, the assessment team conducted interviews and reviewed appropriate documentation to assess policies and procedures, and tested the implementation of SFI program requirements at the Montesano, WA Field Office.

In total, the audit team spent half a day auditing the central office functions and 2 days on-site for field assessments. Overall, 15 field sites were sampled, including 4 active harvesting and road construction sites, 2 closed out harvest sites, 1 completed road construction site, 4 planting sites, 1 commercial thinning site, 1 brushing site, and 1 bridge deactivation/stream rehab site. The audit report was dated February 28, 2019.

**Summary of Conformance, Findings, and Good Management Practices**

**FOREST MANAGEMENT**

<b>Objective</b>	<b>Performance Measure</b>	<b>Evidence of Conformity</b>
<p><b>Objective 1. Forest Management Planning</b> To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion</p>	<p><i>Performance Measure 1.1 Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and-yield modes.</i></p>	<p><i>Evidence: Interview with FGS Area Foresters, SFI Representative and Regional Manager. SFI 2015-1029 Forest Management Standard Requirements FGS Washington and Oregon Forest, Cascade Forest Inventory Annual Update (Jan 2018), Forest Inventory System Technical Description Oregon and Washington, Inventory Summary, AAC calculations, various timber harvest plans, maps and GIS records, FGSC Forest Inventory presentation/slides.</i></p> <p>FGS forest management planning for all the company's timberlands is centralized in Hilt, CA. For the Washington and Oregon lands FGS has a 5-year management plan that is updated every two to three years, with forest inventory data that is updated annually. FGS's forest inventory consist of planting records, stocking survey's, current cruise information from mature and commercial thinned stands. Harvest notifications are submitted to the State (Oregon or Washington) for review or approval. FGS will only cut harvest levels within their long-term AAC with the exception for forest health salvage, if necessary. Long Range Sustained Yield ("LRSY") Monitoring shows harvest acres by silviculture and stand class in relation to LRSY.</p> <p>FGS has developed a land classification system that is part of their forest inventory and GIS. FGS manages biodiversity at the landscape scale and incorporates harvest unit opening size, timber types, timber age classes into the long term harvest planning. FGS foresters get their soils maps and information from the Federal Natural Resources Conservation Service ("NRCS"). FGS's Washington and Oregon stands are annually grown with the FLIPS growth-and yield software. FGS has a spatial resource GIS that links directly to the forest inventory and are updated periodically/frequently. FGS "strives" to maintain a sustainable balance of age distribution to promote sustainable forestry. FGS provides wildlife enhancements, public hunting opportunities, and riparian protection.</p>
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<p><i>Performance Measure 1.2 Program Participants</i></p>	<p><i>Evidence: Interview with FGS Area Foresters and SFI Representative. SFI 2015-2019 Forest Management Standard Requirements FGS</i></p>

	<i>shall not convert one forest cover type to another forest cover type, unless in justified circumstances.</i>	<i>Washington and Oregon Forest Document.</i>  FGS rarely converts one cover type to another cover type. Where forest cover conversion is required, FGS policy is to comply with all local and federal laws and policies. FGS follows the local and federal forest practice rules and protects any unique and rare forest types. Forests critical to threatened and endangered species, and special sites are protected by the forest practices rules and federal legislation.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 1.3 Program Participants shall not have within the scope of their certification to this SFI 2015-2019 Forest Management Standard, forestlands that have been converted to non-forestland use.</i>	<i>Evidence: Interview with FGS Area Forester, SFI Representative and Regional Manager. SFI 2015-2019 Forest Management Standard Requirements FGS Washington and Oregon Forest Document.</i>  FGS has not converted forest lands to other uses.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<b>Objective 2. Forest Health and Productivity</b> To ensure long-term forest productivity, carbon storage and conservation of forest resources through prompt reforestation, afforestation, minimized chemical use, soil conservation, and protecting forests from damaging agents.	<i>Performance Measure 2.1 Program Participants shall promptly reforest after final harvest.</i>	<i>Evidence: Interviews with FGS Silviculture forester, review of Timber Harvesting Plans (THPs) and Stocking Reports, and site visits to completed harvesting units.</i>  FGS utilizes both even and uneven aged silviculture systems (commercial thinning, shelter wood and seed trees with natural regeneration). Harvest units that are clear-cut at final harvest are planted to meet stocking standards. FGS completes a stocking survey post planting to determine if the stocking is sufficient and locate understocked areas.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 2.2 Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public and the environment, including wildlife and aquatic habitats.</i>	<i>Evidence: Interviews with FGS Silviculture forester, review of THPs and site visits to planting units. Pesticide Use Reports &amp; Restricted Materials Permits.</i>  FGS does minimize chemical use through chemical trials, training, and pesticide advisor prescribed herbicides.  All herbicide application is targeted and in accordance with State laws and regulations which include notifications, permits/licensing, chemical storage and signage, and meeting application requirements. Integrated pest management is used where feasible, including working with other landowners, the State and County officials.  FGS does not use pesticides banned under the Stockholm Convention on Persistent Organic Pollutants (2001).
	No Nonconformities or were identified related to this performance measure.	
	One Opportunity for Improvement was identified. Fruit Growers is doing well to limit their herbicide use when it appears that treatments will not be required to encourage crop tree growth or where mechanical crop tree release seems feasible. Fruit Growers may wish to consider maintaining a	

	tracking system of chemical use (amalgamating chemical use reports) to better document their efforts to minimize use.	
	<i>Performance Measure 2.3 Program Participants shall implement forest management practices to protect and maintain forest and soil productivity.</i>	<i>Evidence: Review of THPs, GIS, soils maps. Interviews with silviculture foresters. Site visits to harvesting units.</i>  FGS minimizes soil compaction by using seasonal harvest restrictions, protection of high risk erosion areas, and post-harvest site work. Erosion plans are documented in the timber harvest plan and erosion control plan. Vulnerable areas are also identified in Inspection Reports and onsite action plans are developed to mitigate compaction/soil disturbance issues.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 2.4 Program Participants shall manage so as to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases, and invasive exotic plants and animals, to maintain and improve long-term forest health, productivity, and economic viability.</i>	<i>Evidence: Interviews with Silviculture Forester and Area Forester. Review of THPs and documents. Site visits to harvesting and silviculture units.</i>  FGS uses Best Management Practices (“BMP’s”) to reduce the spread of invasive plants such as, using certified straw for stream crossings, a salvage program, participation in a cooperative county program. FGS is an active participant in fire control to ensure the protection of their timberlands. FGS supports Washington State Department of Natural Resources (“WA DNR”) and Oregon Department of Forestry (“ODF”), and cooperative programs such as the Douglas Forest Protection Association, East Land County FPA and the Linn County FPA that provide fire protection through fuel load reduction. They also support the Cascade Animal Damage Cooperative which assists in the protection of their resources.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 2.5 Program Participants that deploy improved planting stock, including varietal seedlings, shall use best scientific methods.</i>	<i>Evidence: Interview with Silviculture Forester. Review of THPs and documents. Site visits to harvesting and silviculture units</i>  FGS is a member of Northwest Tree Improvement Cooperative and Roseburg Tree Improvement Cooperative to improve local seed stock. The Schroeder Tree Improvement Cooperative then takes the improved seed stock and germinates the seed for local tree farms, which FGS is a member and a supporter. FGS also completes progeny testing, actively participates in local seed orchards (where there are no co-ops), and collects wild seed.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<b>Objective 3. Protection and Maintenance of Water Resources</b> To protect the water quality of rivers, streams, lakes, wetlands and other water bodies through meeting or exceeding best management practices.	<i>Performance Measure 3.1 Program Participants shall meet or exceed all applicable federal, provincial, state and local water quality laws, and meet or exceed best management practices developed under Canadian or U.S. Environmental Protection Agency – approved water quality programs.</i>	<i>Evidence: Interview with Area Foresters, Review of THPs, Contracts, Inspection Checklists, GIS, soils maps, Site visits to harvesting and road projects.</i>  Logging, road construction and silviculture contracts specify requirements for full compliance with all applicable laws and regulations including the Fish and Game Code, water quality protection laws, State Forest Practice Rules, and labor and safety laws.  FGS Timber Operations foresters supervise all operations. A pre-work with the qualified contractor takes place which covers a variety of issues including: property lines, harvest method, leave areas/wildlife trees, erosion issues, roads and culverts , log specs, rare plants and wildlife issues, slash treatment & fire plan. Inspections/site visits are done on a weekly basis to ensure BMP compliance.

	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 3.2 Program Participants shall implement water, wetland and riparian protection measures based on soil type, terrain, vegetation, ecological function, harvesting system, state best management practices (BMPs), provincial guidelines and other applicable factors.</i>	<i>Evidence: Interview with Area Forester, Review of THPs, Contracts, Inspection Checklists, GIS, soils maps, Site visits to harvesting and road projects. Wet weather policy.</i>  FGS maintains water feature coverages in their GIS baselayer including: springs, seeps, streams and other standing water body features. All streams are updated when planning operations, including stream class by assessment and confirmation of fish presence or absence. Timber Harvest Plan's ("THP's") in California define water protection buffers which are marked in the field and periodically reviewed by State Foresters. Stream protection is maintained during all phases of logging by licensed timber operators.  Water quality is protected through planning and shut-down of operations in the field during wet weather events. These measures are discussed during pre-works, logger training and inspections.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<b>Objective 4. Conservation of Biological Diversity</b> To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote a diversity of types of habitat and successful stages, and the conservation of forest plants and animals, including aquatic species, as well as threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests and ecologically important sites.	<i>Performance Measure 4.1 Program Participants shall conserve biological diversity.</i>	<i>Evidence: Interview with Area Forester, Review of THP's and wildlife management plans, GIS, Noxious weeds policy. Site visits to harvesting units. Interview with forestry and wildlife staff, FGS SFI 2015-19 FM Requirements, review of FGS GIS and mapping</i>  Each THP has specific measures in place on a site specific basis which address a variety of features such as species and habitat conservation and other measures. Notifications are submitted to State agencies who verify there are no issues associated with Threatened & Endangered ("T&E") species or other Species of Concern.  The company uses NatureServe to review site specific T&E species or other special features. The company has a wildlife biologist on staff who updates their GIS coverages and documents every year.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 4.2 Program Participants shall protect threatened and endangered species, Forests with Exceptional Conservation Values (FECV) and old-growth</i>	<i>Evidence: Interview with with forestry and wildlife staff, Review of THP's and wildlife management plans, GIS, Noxious weeds policy, FGS SFI 2015-19 FM Requirements, and FGS GIS and mapping. Site visits to harvesting units.</i>  In Washington State, FGS is part of a statewide habitat conservation plan which is administered by the WA DNR. In Oregon, these issues are

	<i>forests.</i>	regulated by theODF, Department of Fish and Wildlife, and U.S. Fish and Wildlife Service. FGS cooperates with these agency to ensure biological diversity is maintained or enhanced. FGS regularly consults with the state’s fish and wildlife service to ensure protection of wildlife habitat features.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 4.3 Program Participants shall manage ecologically important sites in a manner that takes into account their unique qualities.</i>	<i>Evidence: Interview with Area Foresters, Review of THPs, GIS. Site visits to harvesting units</i>  FGS regularly consults with experts for a particular area of interest. Foresters will natural heritage data that to assist in locating important sites for protection. Much of the identification and protection of unique sites are part of the Washington’s Forest Practices Application (“FPA”) process. Ecological important sites are identified, mapped, imported to GIS, and cataloged to ensure accurate location and protection.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 4.4 Program Participants shall apply knowledge gained through research, science, technology, and field experience to manage wildlife habitat and contribute to the conservation of biological diversity.</i>	<i>Evidence: Interview with Area Forester, Review of THP’s and wildlife management plans, GIS</i>  FGS cooperates with state and federal agencies for long-term heritage programs. FGS provides access to the ownership for land surveys and any other pertinent information that is needed for research. In Washington State, the Forest Service has access to permeant growth plots that are within FGS ownership. Information pertaining to Forests of Exceptional Conservation Value (“FECV”) is very limited and FGS will continue to search for any viable information.  FGS works closely with groups such as Washington State and Oregon’s SFI Implementation Committee (“SIC”), and Washington Forest Protection Association (“WFPA”). Biodiversity discussed at quarterly staff meetings. FGS is a member of the SIC’sfor California, Oregon and Washington State
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<b>Objective 5. Management of Visual Quality and Recreational Benefits</b> To manage the visual impact of forest operations and provide recreational opportunities for the public.	<i>Performance Measure 5.1 Program Participants shall manage the impact of harvesting on visual quality.</i>	<i>Evidence: Interviews with Area Forester, Review of THPs and GIS.</i>  Visual quality is considered as part of the THP process. FGS's program to address visual quality management includes incorporating aesthetics considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern. Aesthetics management is implemented where visual impacts are a concern.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 5.2 Program Participants shall manage the size, shape and placement of clear-cut harvests.</i>	<i>Evidence: Interviews with Area Forester, Review of THPs, SFI Annual Report, and GIS.</i>  FGS has procedures in place to limit the average clearcut size to meet state requirements. The average clearcut size is tracked and documented in the FGS GIS. In 2017, FGS averaged 38 acres per unit across their Cascade division, and 27 acres per unit across their entire ownership.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	

	<i>Performance Measure 5.3 Program Participants shall adopt a green-up requirement or alternative methods that provide for visual quality.</i>	<i>Evidence: Interviews with Area Forester, Review of THPs , SFI Annual Report</i>  Green up requirements are defined within THP process and are specified in State Forest Practice Rules. These vary by State. In Washington State, the green up requirement is five feet tall or 5 years old. In Oregon, it's 4 years old or 4 feet tall. FGS meets State requirements for all units.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 5.4 Program Participants shall support and promote recreational opportunities for the public.</i>	<i>Evidence: Interviews with Area Forester, Review of THPs , SFI Annual Report</i>  FGS provides hunting, fishing, mushroom picking, and other recreational opportunities to the public. Many of the roads are private and so access is restricted to non-vehicular use.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<b>Objective 6. Protection of Special Sites</b> To manage lands that are geologically or culturally important in a manner that takes into account their unique qualities.	<i>Performance Measure 6.1 Program Participants shall identify special sites and manage them in a manner appropriate for their unique features.</i>	<i>Evidence: Interview with Area Forester. Review of THP. Site visits to harvesting units.</i>  FGS follows state forest practice rules which specifies protection of special sites. FGS does its due diligence through research and consulting with experts for specific special sites. Some examples of these sites include a burial site in the Bruceport block and wet areas in the Elk Creek block. Both of these involved consultation with agency officials to ensure adequate protection of these special sites.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<b>Objective 7. Efficient Use of Fiber Resources</b> To minimize waste and ensure the efficient use of fiber resources.	<i>Performance Measure 7.1 Program Participants shall employ appropriate forest harvesting technology and in-woods manufacturing processes and practices to minimize waste and ensure efficient utilization of harvested trees, where consistent with other SFI 2015-2019 Forest Management Standard Objectives.</i>	<i>Evidence: Interviews with Area Forester, review of harvest inspection reports, site visits to harvest units.</i>  FGS routinely looks to increase the utilization of their product. This includes management of harvest residue as part of the Forest Practice Rules followed by FGS. The reduction of these residues are important for safety and for managing fuel loads.  FGS is routinely looking for different markets to assist in the management of their lower quality and waste fiber. FGS logging supervisors are constantly inspecting logging operations for proper utilization of fiber and the company will also analyze volume reports to insure proper utilization of fiber.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<b>Objective 8. Recognize and Respect Indigenous Peoples' Rights</b> To recognize and respect Indigenous Peoples' rights and traditional knowledge.	<i>Performance Measure 8.1 Program Participants shall recognize and respect Indigenous Peoples' rights.</i>	<i>Evidence: Interview with Area Forester /SFI Representative, SFI 2015-2019 Forest Management Standard Requirements</i>  FGS has written a commitment to respect Indigenous People's rights in the FGS SFI 2015-2019 Forest Management Standards Requirements manual.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 8.2 Program Participants</i>	<i>Evidence: Interview with Area Forester/SFI Representative, SFI 2015-2019 Forest Management Standard Requirements</i>

	<i>with forest management responsibilities on public lands shall confer with affected Indigenous Peoples with respect to sustainable forest management practices.</i>	Not applicable. FGS does not have forest management responsibilities on public land.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 8.3 Program Participants are encourage to communicate with and shall respond to local Indigenous Peoples with respect to sustainable forest management practices on their private lands.</i>	<i>Evidence: Interview with Area Forester/SFI Representative, SFI 2015-2019 Forest Management Standard Requirements</i>  Protection of cultural heritage sites is included in State Forest Practice Rules. Prior to timber operations FGS is required to consult with tribal information sources as well as survey for sites on the ground. Foresters are trained for recognizing and protecting archeological sites. Field observations are documented and reported to the tribal information sources. Proposed timber operations are screened by the Washington Department of Natural Resources and the Oregon Department of Forestry for potential cultural sites.  Under State Forest Practice Rules FGS is required to notify adjacent Indigenous Peoples of any planned timber harvest. This also includes consultation if there are any concerns. Their foresters are very receptive to inquiries and concerns and provide a prompt and respectful response.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<b>Objective 9. Legal and Regulatory Compliance</b> To comply with applicable federal, provincial, state, and local laws and regulations.	<i>Performance Measure 9.1 Program Participants shall comply with applicable federal, provincial state and local forestry and related social and environmental laws and regulations.</i>	<i>Evidence: Reviewed Harvesting Contracts, Inspection Reports, and interviews with loggers and other contractors.</i>  Each FGS site has access to current laws and regulations and all foresters are familiar with these. They have policies and procedures in place to help them comply with the State’s Forest Practice Rules and consults with the appropriate agencies. These include documented start up/pre-work procedures, and regular site visits to active logging operations to assess compliance. All completed harvest units get a site visit FGS staff to ensure regulatory and BMP compliance. Additionally, FGS has a strong internal audit program which annually reviews forestry practices and files.
	One Nonconformity was identified in relation to this performance measure.  FGS requires that their operators maintain functioning fire equipment and spill kits on their machinery during active operations. On one harvest unit visited in Oregon no spill kit was available on the landing where several pieces of equipment were working. On a second unit in Washington State, three out of four fire extinguishers inspected were either in the Red or the status was unidentifiable.  No Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 9.2 Program Participants shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state and local levels in the country in which the Program Participant operates.</i>	<i>Evidence: Interview with Area Forester/SFI Representative, SFI 2015-2019 Forest Management Standard Requirements</i>  Requirements for legal compliance is specified in Section 2 of the FGS Employee Handbook. FGS staff receive training related to compliance with applicable social laws. All employees have to agree to abide by the company’s social policies. Contractors are also require to sign a contract that specifies these social laws.

	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<p><b>Objective 10. Forestry Research, Science and Technology</b> To invest in forestry research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of climate change impacts on forests, wildlife and biological diversity.</p>	<p><i>Performance Measure 10.1</i> <i>Program Participants shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners provide in-kind support or funding for forest research to improve forest health, productivity and sustainable management of forest resources, and the environmental benefits and performance of forest products.</i></p>	<p><i>Evidence: Record of financial contributions, SFI Annual Report</i></p> <p>FGS provides funding and is a member of the WFPA which assists in sound management of the forest through Association’s research, science, and technologies. They are also a member of various cooperative seed programs.</p> <p>In Oregon FGS is a supporter and cooperater with the Oregon Department of Resource Institute and the Oregon Forest &amp; Industries Council. Each of these organizations assists in the sound management of the forest through research, science, and technologies.</p>
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<p><i>Performance Measure 10.2</i> <i>Program Participants shall individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners – develop or use state, provincial or regional analyses in support of their sustainable forestry programs.</i></p>	<p><i>Evidence: Interview with Area Forester/SFI Representative, SFI 2015-2019 Forest Management Standard Requirements FGS for WA, OR and CA.</i></p> <p>FGS is an active member of the California, Oregon and Washington SFI Implementation Committee’s, the Society of American Foresters, the California Licensed Forester’s Association, and the California Forestry Association. FGS foresters attend SIC meetings in all three States that it owns lands in.</p>
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<p><i>Performance Measure 10.3</i> <i>Program Participants shall – individually and/or through cooperative efforts involving SFI Implementation Committees, associations or other partners – broaden the awareness of climate change impacts on forests, wildlife and biological diversity.</i></p>	<p><i>Evidence: Interview with Area Forester/SFI Representative, SFI 2015-2019 Forest Management Standard Requirements FGS for WA, OR and CA. FGS SFI Annual Meeting Agenda and PowerPoint presentation (January 28, 2016).</i></p> <p>FGS foresters are always continuing their education and are aware of current and future impacts from climate change. Their forest inventory system is consistently being updated with current data, including information generated through their various research affiliations. Stands with cruise data that is more than ten years is target for survey. With current information, they are able to see any impacts of climate change and adjust their future management plans. Climate change impacts on wildlife has been a discussion topic in meetings with the Washington Department of Natural Resources, and the Department of Fish and Wildlife.</p>
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<p><b>Objective 11. Training and Education</b> To improve the implementation of</p>	<p><i>Performance Measure 11.1</i> <i>Program Participants shall require appropriate</i></p>	<p><i>Evidence: Interview with Area Forester/SFI Representative, FGS SFI 2015-19 FM Requirements, FGS Annual SFI training &amp; FGS website</i></p> <p>FGS has committed to managing their operations (including solid wood</p>

<p>sustainable forestry practices through appropriate training and education programs.</p>	<p><i>training of personnel and contractors so that they are competent to fulfill their responsibilities under the SFI 2015-2019 Forest Management Standard.</i></p>	<p>and carton plant) under the SFI Standards - <a href="http://www.fruitgrowers.com/pgs/Sustainability.php">http://www.fruitgrowers.com/pgs/Sustainability.php</a> A required companywide (Northern Operations) annual SFI meeting includes training and updates regarding the SFI program, and includes a summary of how the company is achieving their pursuit for sustainable forestry. The internal and external audit results are discussed and ideas on how the company can improve in specific aspects of management. SFI 2015-2019 management objectives, performance measures, and indicators are also reviewed. The SFI standards and the company responsibility to continue practicing sustainable forestry is communicated throughout the organization.</p>
	<p>No Nonconformities or Opportunities for Improvement were identified related to this performance measure.</p>	
	<p><i>Performance Measure 11.2 Program Participants shall work – individually and/or with SFI Implementation Committees, logging or forestry associations, or appropriate agencies or others in the forestry community – to foster improvement in the professionalism of wood producers.</i></p>	<p><i>Evidence: Interview with Area Forester/SFI Representative, FGS SFI 2015-19 FM Requirements</i></p> <p>Information regarding these issues are covered by the Master Loggers Program, Washington Contractors Logging Association, Oregon Professional Loggers Program, and SFI Implementation Committee. Loggers training programs do have a continuing education component.</p>
	<p>No Nonconformities or Opportunities for Improvement were identified related to this performance measure.</p>	
<p><b>Objective 12. Community Involvement and Landowner Outreach</b> To broaden the practice of sustainable forestry through public outreach, education and involvement, and to support the efforts of SFI Implementation Committees.</p>	<p><i>Performance Measure 12.1 Program Participants shall support and promote efforts by consulting foresters, state, provincial and federal agencies, state or local groups, professional societies, conservation organizations, Indigenous Peoples and governments, community groups, sporting organizations, labor, universities, extension agencies, the American Tree Farm System® and/or other landowner cooperative programs to apply principles of sustainable forest management.</i></p>	<p><i>Evidence: Interview with Area Forester/SFI Representative, FGS SFI 2015-19 FM Requirements, Record of financial contributions, SFI Annual Report, SFI Implementation Committee Meeting Minutes.</i></p> <p>FGS is a member of the California, Oregon and Washington SFI Implementation Committees. They support the National Council for Air and Stream Improvement (NCASI) - Western Wildlife Program, Forest Foundation, Washington Forest Protection Association, Oregon Forest Resource Institute, and the Oregon Forest and Industrial Council. They participate in efforts to promote conservation of managed forest in cooperation with conservation organizations and have sold land to assist in these programs.</p>
	<p>No Nonconformities or Opportunities for Improvement were identified related to this performance measure.</p>	
	<p><i>Performance Measure 12.2 Program Participants shall support and promote, at the state,</i></p>	<p><i>Evidence: Interview with Area Forester/SFI Representative, FGS SFI 2015-19 FM Requirements Record of financial contributions, SFI Annual Report.</i></p> <p>FGS participates in the WA, OR and CA SFI Implementation</p>

	<i>provincial or other appropriate levels, mechanisms for public outreach, education and involvement related to sustainable forest management.</i>	Committees and the Committees efforts to address concerns about nonconforming practices.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 12.3 Program Participants shall establish at the state, provincial or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, unions, the public or other Program Participants regarding practices that appear inconsistent with the SFI 2015-2019 Forest Management Standard principles an objectives.</i>	<i>Evidence: Reviewed meeting minutes for various SIC's.</i>  The WA, OR & CA SIC's have hotline numbers and emails on their website. FGS supports the SFI Implementation Committee's process to responding to public inquires.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<b>Objective 13. Public Land Management Responsibilities</b> To participate and implement sustainable forest management on public lands.	<i>Performance Measure 13.1 Program Participants with forest management responsibilities on public lands shall participate in the development of public land planning and management processes.</i>	<i>Evidence: Not applicable.</i>  FGS does not manage public lands.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<b>Objective 14. Communications and Public Reporting</b> To increase transparency and to annually report progress on conformance with the SFI 2015-2019 Forest Management Standard.	<i>Performance Measure 14.1 A Program Participant shall provide a summary audit report, prepared by the certification body, to SFI Inc. after the successful completion of a certification, recertification or surveillance audit to the SFI 2015-2019 Forest Management Standard.</i>	<i>Evidence: Audit Report, SFI Public Summary Report.</i>  PwC prepares an annual SFI audit report. The SFI Public Summary is submitted annually.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
	<i>Performance Measure 14.2 Program Participants shall report annually to</i>	<i>Evidence: 2017 Annual SFI Report and correspondence from SFI.</i>  FGS has provided resources to ensure prompt response to the SFI annual progress report survey. Jay Powell supplied the FGS annual

	<i>SFI Inc. on their conformance with the SFI 2015-2019 Forest Management Standard.</i>	report to SFI, which was sent in early March, 2018.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	
<b>Objective 15. Management Review and Continual Improvement</b> To promote continual improvement in the practice of sustainable forestry by conducting a management review and monitoring performance.	<i>Performance Measure 15.1 Program Participants shall establish a management review system to examine findings and progress in implementing the SFI 2015-2019 Forest Management Standard, to make appropriate improvements in programs, and to inform their employees of changes.</i>	<i>Evidence: FGS Internal Audit, FGS Annual Management Review, FGS SFI Annual Meeting Agenda and PowerPoint presentation (February 1, 2018).</i>  A Management Review and evaluation of FGS’s SFI program is done periodically throughout the year. Much of the information regarding the improvement to FGS’s program is gathered through the internal and external audits. The lead FGS SFI representative is responsible for putting together a task management plan. Their annual SFI meeting functions as a management review and training session to promote the continued improvement of their forest management system.
	No Nonconformities or Opportunities for Improvement were identified related to this performance measure.	

**Specific Good management practices are noted below:**

- On their Oregon lands, Fruit Growers uses tarps to cover their slash piles to allow them to burn their logging waste later in the season. These efforts help them reduce the risk of uncontrolled fires.
- Fruit Growers has opted to hire a more costly road construction contractor that commonly builds to highways standards. The superior quality of these roads, observed on two recent harvest units, was evident.
- Fruit Growers has begun to more actively manage their Oregon lands to improve access and apply more intensive silviculture practices with the goal of improving the overall quality and value of these lands.

**Conclusion**

The Company has maintained conformance with the requirements of the Sustainable Forestry Initiative Forest Management Standard [2015-2019]. The Certificate can be obtained by contacting Jay Powell of Fruit Growers at 530-475-3453. More information on Fruit Growers’ sustainable forestry program can be found at: [www.fruitgrowers.com](http://www.fruitgrowers.com).