

# **Audit of Forest Planning and Practices**

**West Fraser Mills Ltd.  
Skeena Sawmills Division  
Tree Farm Licence 41**

**FPB/ARC/24**

**December 1999**

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## **Report from the Board**

## A. Report from the Board

This is the Board's report on a compliance audit<sup>1</sup> of Tree Farm Licence (TFL) 41<sup>2</sup> held by West Fraser Mills Ltd., Skeena Sawmills Division (West Fraser). TFL 41 is located south of Terrace, with operations in the Kitimat Valley, around the Douglas Channel and around Kemano (see map).

The audit examined West Fraser's operational planning (including forest development plans, silviculture prescriptions, and logging plans), timber harvesting, road construction, maintenance and deactivation, silviculture and fire protection for the period September 1, 1997 to September 1, 1998, to assess compliance with the *Forest Practices Code of British Columbia Act* and related regulations (the Code).

Before completing this report, the Board considered written representations from West Fraser, as required by section 182 of the Act.

The Board's conclusions are based on an audit of the following plans and practices:

- operational plans approved during the audit period, including the approved 1997-2002 Forest Development Plan, a fire preparedness plan, 21 silviculture prescriptions and 21 logging plans<sup>3</sup>
- silviculture prescriptions and logging plans for 25 cutblocks to be harvested in the future
- operational plans, approved before the audit period, related to the practices audited
- harvesting of 27 cutblocks
- construction of 43 kilometres of road
- maintenance of approximately 200 kilometres of road
- construction of eight bridges and maintenance of 23 bridges
- planting of 71 cutblocks and brushing of 34 cutblocks
- free growing obligations on 25 cutblocks and regeneration delay obligations on four cutblocks
- fire protection activities

## Conclusions

West Fraser's operational planning and forest practices generally complied with Code requirements. The only significant non-compliance involved two fish streams in one cutblock

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<sup>1</sup> Part B of this document provides background information on the Board's audit program and the process followed by the Board in preparing its report.

<sup>2</sup> The report from the auditor (Part C of this document) provides specifics about the operating areas of Tree Farm Licence 41 and the forest planning and field activities of West Fraser Mills Ltd. that were the subject of this audit and the audit findings.

<sup>3</sup> The requirement to prepare logging plans was repealed on June 15, 1998, however, logging plans approved before that date continue to be in effect.

that were incorrectly classified as non-fish-bearing in the approved silviculture prescription and logging plan for the block. The Board notes this is a high degree of compliance, considering the TFL is in a remote area with difficult operating conditions, including steep terrain and many streams and rivers, most of which contain fish.

The misclassification of an S3 stream resulted in the removal of all trees from the riparian reserve zone, bank damage from yarding across the stream, and the installation of a culvert that impeded fish passage. On an S2 stream, the riparian reserve was not adequately protected. Trees in the reserve blew down after the block was logged.

**Riparian reserve zone:** an area next to a stream, wetland or lake where harvesting of trees is not normally permitted. These reserves are required on some classes of fish streams.

This finding is not indicative of West Fraser's current practices near streams, but is significant because of the impact on the two streams and their riparian reserve zones. The Board's special investigation into planning and practices around coastal streams<sup>4</sup> identified issues with the classification of fish streams throughout the coast. As a result, West Fraser had an opportunity to review the classification of streams in TFL 41, but failed to correct the classifications of these streams before logging started.

Both streams have gradients less than 20% and flow directly into a fish-bearing stream. Therefore, the Code required that an inventory be conducted before the streams could be classified as non-fish bearing. The Board does not accept West Fraser's assertions that field observations made at the time the streams were originally classified constituted an inventory. West Fraser's stream measurements and fish sampling after logging confirmed that the streams are low gradient, flow directly into a fish stream, and have resident fish.

**Fish inventory:** a survey, usually by capturing or observing fish, to determine the presence, numbers and species distribution of fish. Fish inventories also collect detailed information about a stream to determine the likelihood of fish presence and the capability of the habitat to support fish

## Recommendation

1. As provided by section 185 of the Act, the Board recommends that West Fraser Mills Ltd.:
  - a) engage a qualified professional to identify potential remedial actions, and if remedial actions are possible, prepare an action plan that meets Code requirements and mitigates the impacts on the two riparian reserves and stream banks;
  - b) complete the recommended remedial actions specified in the plan; and
  - c) complete remedial actions to remove the barrier to fish passage created by the culvert on one of the streams.

In accordance with section 186 of the Act, the Board requests that West Fraser advise the Board by March 31, 2000, of the actions taken to implement this recommendation.

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<sup>4</sup> The Board's 1998 report, *Forest Planning and Practices in Coastal Areas with Streams*, identified issues regarding the accuracy of the classification of fish streams on the coast. This review included blocks in the Kalum Forest District, of which several blocks were in West Fraser's tree farm licence.

## Two Other Issues Arising from the Audit

Two other issues were identified during the audit of TFL 41. These do not represent non-compliance with Code requirements on the part of West Fraser, but do identify forest management concerns that exist within the TFL area. Because this is a tree farm licence, other legal obligations relating to these issues may exist under West Fraser's management plan for TFL 41 or the *Forest Act*.

### Provisions for Non-Timber Forest Resources in Forest Development Plans

The Code requires that a forest development plan specify measures that will be carried out to protect forest resources. The Code anticipates that broad objectives for managing non-timber resources, such as the maintenance of successional stages of the forest for the protection of biodiversity or the maintenance of habitat for wildlife species, would be set out in "higher level plans." To date, no higher level plans have been formally established for TFL 41.

The Code does not require that forest development plans address landscape level objectives that have not been formally established as higher level plans. It was not clear during the audit if all forest resources had been identified in the TFL. As a result, the audit could not determine whether the operational plans, including the forest development plans, adequately addressed all non-timber forest resources.

**Higher level plan:** a management objective for a broad geographical area established by government as a higher level plan under the Code. Forest resource objectives in higher level plans guide the objectives and management strategies in operational plans such as forest development plans.

Cultural heritage, recreation and some wildlife objectives were addressed in some of West Fraser's operational planning processes, but not always in the forest development plan. The Board is concerned that the forest development plan contains little or no information to describe other wildlife, such as the tailed frog and grizzly bear, and non-timber forest values which exist in West Fraser's tree farm licence, or explain how they will be protected.

This lack of information in the forest development plan diminishes the opportunity for public review and comment, limits the legal commitment for West Fraser to manage or protect these resources, and provides no opportunity for government enforcement except where measures to protect these resources are included in West Fraser's operational plans at the site level.

It is the Board's opinion that, despite the absence of formally designated higher level plans, there is a need to incorporate measures for protecting non-timber forest resource values in forest development plans. The Board believes this is consistent with the intent of the Code.

### Recommendations

As provided by section 185 of the Act, the Board makes the following recommendations.

1. The Board recommends that the West Fraser Mills Ltd. ensure that its forest development plans incorporate currently available information on non-timber forest resources in its tree farm licence, include objectives for their management and specify measures that will be taken to protect these resources.
2. The Board recommends that government expedite the development and establishment of higher level plans, including landscape unit objectives, in a way that assists West Fraser in addressing non-timber forest resources in its forest development plans.

In accordance with section 186 of the Act, the Board requests that West Fraser and the Ministry of Forests advise the Board by March 31, 2000 of the actions taken to implement these recommendations.

### **Old roads located in Tree Farm Licence 41**

The audit identified four old road systems within TFL 41 that have the potential to cause harm to the environment. These roads were built in naturally unstable terrain and there is evidence of problems, which may lead to landslides and affect productive forest sites and streams.

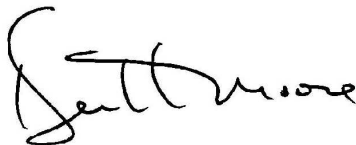
These roads were built and used before the introduction of the Code and West Fraser has not used these roads since the Code came into effect. Therefore, under the Code, West Fraser does not have a legal obligation to maintain or deactivate these roads. No party appears to have this legal responsibility.

The Board believes that these old roads could result in slides and erosion, presenting a potential problem in the tree farm licence. Some of these roads are scheduled for deactivation projects funded by Forest Renewal BC. Remedial action is necessary, irrespective of which party—West Fraser or the government—is responsible for the remainder of these road systems.

### ***Recommendation***

As provided by section 185 of the Act, the Board recommends that government and West Fraser Mills Ltd. take measures to address the stability of old road systems within TFL 41.

In accordance with section 186 of the Act, the Board requests that West Fraser and the Ministry of Forests advise the Board by March 31, 2000 of the actions taken to implement these recommendations.

A handwritten signature in black ink, appearing to read 'Keith Moore', with a stylized, cursive script.

Keith Moore  
Chair

December 29, 1999

The panel of the Board that considered the Report from the Auditor, considered representations and concluded this report, was Keith Moore, Klaus Offermann, Fred Parker, and Liz Osborn.

## **Forest Practices Board Compliance Audit Process**



## **B. Forest Practices Board Compliance Audit Process**

### **Background**

The Forest Practices Board conducts audits of government's and agreement holder's compliance with the *Forest Practices Code of British Columbia Act* and regulations (the Code). The Board is given the authority to conduct these periodic independent audits by section 176 of the Act. Compliance audits examine forest planning and practices to determine whether or not they meet Code requirements.

The Board undertakes both "limited scope" and "full scope" compliance audits. A limited scope audit involves the examination of selected forest practices (e.g., roads, or timber harvesting, or silviculture) and the related operational planning activities. A full scope audit examines all operational planning activities and forest practices.

The Board determines how many audits it will conduct in a year, and what type of audits (limited or full scope), based on budget and other considerations. The Board audits agreement holders who have forest licences or other tenures under the *Forest Act* or the *Range Act*. The Board also audits government's Small Business Forest Enterprise Program (SBFEP) which is administered by Ministry of Forests district offices. Selection of agreement holders and district SBFEPs for audit is done randomly, using a computer program, to ensure a fair, unbiased selection of auditees.

### **Audit Standards**

Audits by the Forest Practices Board are conducted in accordance with the auditing standards developed by the Board. These standards are consistent with generally accepted auditing standards.

The audits determine compliance with the Code based on criteria derived from the *Forest Practices Code of British Columbia Act* and its related regulations. Audit criteria are established for the evaluation or measurement of each practice required by the Code. The criteria reflect judgments about the level of performance that constitutes compliance with each requirement.

The standards and procedures for compliance audits are described in the Board's *Compliance Audit Reference Manual*.

### **Audit Process**

#### **Conducting the Audit**

Once the Board selects an audit and decides on the scope of the audit (limited scope or full scope), the staff and resources required to conduct the audit and the period covered by the audit are determined. Board staff also meet with the party being audited to discuss the logistics of the audit before commencing the work.

All the activities carried out during the period subject to audit are identified. This includes activities such as the sites harvested or replanted and road sections built or deactivated during the audit period. The items that comprise each forest activity are referred to as a "population."

For example, all sites harvested form the “timber harvesting population.” All road sections constructed form the “road construction population.” The populations are then sub-divided based on factors such as the characteristics of the sites and the potential severity of the consequences of non-compliance on the sites.

The most efficient means of obtaining information to conclude whether there is compliance with the Code is chosen for each population. Because of limited resources, sampling is usually relied upon to obtain audit evidence, rather than inspecting all activities.

Individual sites and forest practices within each population have different characteristics, such as the type of terrain or type of yarding. Each population is divided into distinct sub-populations on the basis of common characteristics (e.g., steep ground vs. flat ground). A separate sample is selected for each population (e.g., the cutblocks selected for auditing timber harvesting). Within each population, more audit effort (i.e., more audit sampling) is allocated to the sub-population where the risk of non-compliance is greater.

Audit work in the field includes assessments from helicopters and intensive ground procedures such as the measurement of specific features like road width. The audit teams generally spend two to three weeks in the field.

## **Evaluating the Results**

The Board recognizes that compliance with the many requirements of the Code is more a matter of degree than absolute adherence. Determining compliance requires the exercise of professional judgment within the direction provided by the Board.

Auditors collect, analyze, interpret and document information to support the audit results. The audit team, comprised of professionals and technical experts, first determines whether forest practices are in compliance with Code requirements. For those practices considered to not be in compliance, the audit team then evaluates the degree to which the practices are judged not in compliance. The significance of the non-compliance is determined based on a number of criteria including the magnitude of the event, the frequency of its occurrence, and the severity of the consequences.

As part of the assessment process, auditors categorize their findings into the following levels of compliance:

**Compliance** – where the auditor finds that practices meet Code requirements.

**Not significant non-compliance** – where the auditor, upon reaching a non-compliance conclusion, determines that a non-compliance event, or the accumulation and consequences of a number of non-compliance events, is not significant and is not considered worthy of reporting.

**Significant non-compliance** – where the auditor determines that the event or condition, or the accumulation and consequences of a number of non-compliance events or conditions, is significant and is considered worthy of reporting.

**Significant breach** – where the auditor finds that significant harm has occurred or is beginning to occur to persons or the environment as a result of the non-compliance. A significant breach can also result from the cumulative effect of a number of non-compliance events or conditions.

Identification of a possible significant breach requires the auditor to conduct tests to confirm whether or not there has been a breach. If it is determined that a significant breach has occurred, the auditor is required by the *Forest Practices Board Regulation* to immediately advise the Board, the party being audited, and the Ministers of Forests, Energy & Mines, and Environment, Lands & Parks.

## **Reporting**

Based on the above evaluation, the auditor then prepares the “Report from the Auditor” for submission to the Board. The party being audited is given a draft of the report before it is submitted to the Board so that the party is fully aware of the findings. The party is also kept fully informed of the audit findings throughout the process, and is given opportunities to provide additional relevant information and to ensure the auditor has complete and correct information.

Once the auditor submits the report, the Board reviews it and determines whether any party or person is potentially adversely affected by the audit findings. If so, the party or person must be given an opportunity to make representations before the Board decides the matter and issues a final report to the public and government. The representations allow potentially adversely affected parties to present their views to the Board.

At the discretion of the Board, representations may be written or oral. The Board will generally offer written representations to potentially adversely affected parties, unless the circumstances strongly support the need for an oral hearing.

The Board then reviews both the report from the auditor and the representations before preparing its final report, which includes the Board’s conclusions and may also include recommendations, if appropriate.

If the Board’s conclusions or recommendations result in newly adversely affected parties or persons, additional representations would be required.

Once the representations have been completed, the report is finalized and released: first to the auditee and then to the public and government.

## **Report from the Auditor**

## C. Report from the Auditor

### 1. Introduction

As part of the Forest Practices Board's 1998 compliance audit program, Tree Farm Licence (TFL) 41 was selected for audit from the population of major forest licences within the Prince Rupert Forest Region. The TFL, held by West Fraser Mills Ltd. (West Fraser), was selected randomly and not on the basis of location or level of performance.

TFL 41 is managed by West Fraser Mills' Skeena Sawmills Division in Terrace. The TFL is located south of Terrace, around the Kitimat valley, and south-east towards Kemano (see attached map).

TFL 41 has an allowable annual cut of 378,500 cubic metres. The TFL area is 703,745 hectares, of which 332,924 hectares are classified as productive forest, but only approximately 70,000 hectares are in the current timber harvesting land base. Much of the TFL is located in very remote areas, which require boat and barge access to carry out forest practices. The area contains a high proportion of steep slopes, and many streams and rivers. There are a large number of fish-bearing streams in the TFL, and many of the harvest cutblocks contain, or are adjacent to, more than one fish stream.

### 2. Audit Scope

The audit examined the activities and obligations of West Fraser in the areas of operational planning (including forest development plans<sup>1</sup>, silviculture prescriptions<sup>2</sup>, and logging plans<sup>3</sup>), timber harvesting, road construction, maintenance and deactivation, silviculture and fire protection. These activities were assessed for compliance with the *Forest Practices Code of British Columbia Act* and related regulations (the Code), including the transitional provisions of the Code.

The period for which activities were examined was September 1, 1997, to September 1, 1998.

The activities carried out during the audit period, and therefore subject to audit were:

#### ***Operational planning***

- the approved 1997-2002 Forest Development Plan
- 27 approved silviculture prescriptions and logging plans that supported the harvesting activities examined
- silviculture prescriptions and logging plans for 25 cutblocks to be harvested in the future

#### ***Timber harvesting and road construction, maintenance and deactivation***

- harvesting of 27 cutblocks
- construction of 18 road sections totaling 43 kilometres
- maintenance of approximately 200 kilometres of road, involving activities such as surfacing and the cleaning of culverts and ditches

- construction of eight bridges and maintenance of 23 bridges

### ***Silviculture***

- planting of 71 cutblocks and brushing of 34 cutblocks
- free growing obligations on 25 cutblocks and regeneration delay obligations on four cutblocks

### ***Fire protection***

- fire protection planning and infrastructure

Section 3 describes the audit of these activities, and the results. The Board's audit reference manual, "*Audit Reference Manual—Compliance Audits, Version 3.0, May 1998*", sets out the standards and procedures that were used for this audit.

## **3. Audit Findings**

### **Planning and practices examined**

The audit work on selected roads and cutblocks included assessments from the air using helicopters and ground-based procedures. The audit examined the following plans and practices:

#### ***Operational planning***

- the approved 1997-2002 forest development plan
- 13 approved silviculture prescriptions and logging plans that supported the harvesting activities examined
- silviculture prescriptions and logging plans for eight cutblocks to be harvested in the future

#### ***Timber harvesting and road construction, maintenance and deactivation***

- harvesting of 13 cutblocks
- construction of 11 road sections totaling 11 kilometres using ground procedures and the remaining 33 kilometres by helicopter
- maintenance of approximately 42 kilometres of road using ground procedures and an undetermined length by helicopter
- construction of five bridges and maintenance of six bridges

The company did not carry out permanent or semi-permanent deactivation work in the audit period.

### ***Silviculture***

- planting of 14 cutblocks and brushing of 12 cutblocks

- free growing obligations on three cutblocks and regeneration delay obligations on four cutblocks

### ***Fire protection***

- fire protection plans and infrastructure

We also examined, through overview flights, the condition of old roads in the TFL.

### **Findings**

The audit found that, except for the stream classification and resulting riparian management<sup>4</sup> practices in one cutblock, West Fraser's forest planning and practices complied, in all significant respects, with Code requirements.

### ***Stream Classification***

Two fish streams were classified as non-fish-bearing in the approved silviculture prescription and logging plan for a harvest cutblock.

The original classification of the S3 stream as non-fish-bearing (S6) resulted in the removal of all the trees from the riparian reserve zones on both sides of the stream for a length of approximately 250 metres within the block. Trees were also yarded over the S3, causing bank disturbance, and a culvert was installed for a road crossing the S3 with no consideration of in-stream work windows, which are established to ensure safe fish passage.

The S2 stream that was classified as an S5 runs through a draw at the edge of the harvest block, and the block boundary is located at the break of an unstable slope above the stream. Some sedimentation and input of trees and debris had occurred prior to logging as a result of windthrow and natural failures. The width of the riparian reserve zone meets the requirements of the *Operational Planning Regulation*, but if the stream had been recognized as fish-bearing prior to harvest, it is likely that different actions would have been proposed for the riparian management zone to protect the riparian reserve zone. At the time of audit, trees were being blown down in the riparian reserve zone, and trees and debris were reaching the S2 stream.

The operational plans for this cutblock were approved in May 1996, but were based on stream classifications performed in a prior year, and which did not include a fish inventory. In the absence of a fish inventory, the Code requires that such streams be considered fish-bearing. When harvesting was underway on the block, West Fraser found that the streams were fish-bearing, and amended the stream classifications in the operational plans (S5 to S2 and S6 to S3).

Because of the large number of streams in the TFL, the audit focused the harvesting and roads sampling on planning and practices around streams. Additional silviculture prescriptions were field sampled at the pre-harvest stage to determine if the riparian management was appropriate.

These two streams are the only instances noted through the audit where stream misclassification was of concern, or where it resulted in inappropriate management of the riparian features. By the time of the audit, West Fraser staff had identified the correct classification, notified the Ministry of Forests and submitted amendments to the operational plans.

The main areas of the Code to which the non-compliance relates are section 39(3)(b) of the *Operational Planning Regulation* and section 248 of the *Forest Practices Code of British Columbia Act*.

## **4. Other Comments**

### **Forest Resource Planning**

The existence of forest resources, such as heritage and recreation resources and grizzly bear, in the TFL warrants the establishment of objectives at the landscape level to address such forest resources.

Under the Forest Practices Code, landscape level planning is intended to provide direction to forest development planning, for the overall operating area and at the site level, by setting objectives for resource values that need to be conserved. The objectives set in these plans typically include objectives for representative successional stages of the forest, for the maintenance of biodiversity and for managing the habitat of specific species, such as grizzly bear.

There is currently no landscape level plan to provide direction to forest development planning in TFL 41. Landscape level objectives are still in draft form. In addition, government officials had not, at the time of audit, identified any endangered or vulnerable wildlife for special protection. Because of this gap in the higher level planning information anticipated by the Code, there were no objectives established at the landscape level to guide West Fraser in its operational planning.

In the absence of these statutory requirements, forest district managers, in their approval of operational plans, are required by section 41 of the Code to be satisfied that plans will adequately manage and conserve the forest resources of the areas to which they apply. In doing so, district managers may apply discretion in their review of operational plans, and in certain of the assessments they require before approval of the forest development plan and site specific plans. In the case of TFL 41, certain forest resources and measures to protect resources, such as cultural heritage resources, windthrow strategies, recreation resources and some wildlife, were addressed in West Fraser's operational planning processes, even though the strategies and specific measures were not always laid out in the forest development plan.

As landscape level objectives have not yet been established, and as a result it is not clear if all forest resources have been identified, it was not possible to determine whether all forest resources at the landscape level are being adequately addressed. It was also, therefore, not possible to fully assess the level of protection of such resources at the site level.

Because of this limitation in the Code, the audit assessed West Fraser's compliance based on the Code requirements that were in place and the forest resources identified by the district manager during the operational planning process.

### **Old Roads**

Tree Farm Licence 41 covers a large geographic area, and contains many road networks that were built up to 30 years ago. These "old roads" systems were reviewed in the course of the audit, to determine if significant harm had occurred, or had the potential to occur, because of the state of the old roads.



Portions of the road systems are built in naturally unstable terrain, and natural slides in several drainages contribute to high silt levels in the streams.

The audit identified four old road systems, in the Big Wedeene, Bolton, Hirsch and North Chist drainages, that have the potential to cause harm to the environment. Some of the roads in these road systems are on naturally unstable slopes. There is evidence of fill slope failures, tension cracks and cut bank raveling, which may lead to open slope failures, affecting productive forest sites and fish streams.

As these roads were constructed and used before the introduction of the Code and have not been used since, West Fraser does not have a legal obligation under sections 63 and 64 of the Act to maintain or deactivate these roads. Some of these road systems are scheduled for deactivation under Forest Renewal BC projects managed by a committee headed by the Haisla Nation.

## **5. Audit Opinion**

In my opinion, except for the stream classification and resulting riparian management practices in one cutblock described below, the operational planning; harvesting; road construction, maintenance and deactivation; silviculture and fire protection activities carried out by West Fraser Mills Ltd. on TFL 41 were in compliance, in all significant respects, with the requirements of the Code as of September 1998.

As described in section 3 of this report, the misclassification of two fish streams in and adjacent to a harvest cutblock resulted in inappropriate management of the riparian reserves zones. All trees were removed from the riparian reserve zones on both sides of an S3 stream for approximately 250 meters within the block, and the removal of the riparian management zone has contributed to windthrow in the steep and unstable riparian reserve zone of an S2 stream adjacent to the block. This finding is not indicative of West Fraser's practices around riparian features, but was determined to be significant because of the impact on the two streams and their riparian reserve zones.

Without further qualifying my opinion, I draw attention to section 4.1 which explains the place of higher level plans in the planning regimes anticipated by the Code, and the effect that their absence has on the identification of measures to protect forest resource values.

As landscape level objectives have not yet been established, and as a result it is not clear if all forest resources have yet been identified, it was not possible to fully assess whether all forest resources are being adequately protected. Because of this limitation in the Code, the audit assessed West Fraser's compliance based on the Code requirements that were in place and the forest resources identified by the district manager during the operational planning process. This situation was not considered to be non-compliance by West Fraser.

Without qualifying my opinion, I also draw attention to section 4.2 which describes the condition of old roads in the TFL. Portions of the roads are built in naturally unstable terrain, and natural slides in several drainages contribute to high silt levels in the streams. On four of these road systems there is the potential for harm to the environment, arising from the location of roads in unstable terrain or the deteriorating condition of some roads. As these roads were constructed and used before the introduction of the Code and not used since, West Fraser does not have a legal obligation under the Code to maintain or deactivate these roads. West Fraser is

aware of the state of the road systems, and some of these road systems are scheduled for deactivation under Forest Renewal BC projects.

In reference to compliance, the term "in all significant respects" recognizes that there may be minor instances of non-compliance that either may not be detected by the audit, or that are detected but not considered worthy of inclusion in the audit report.

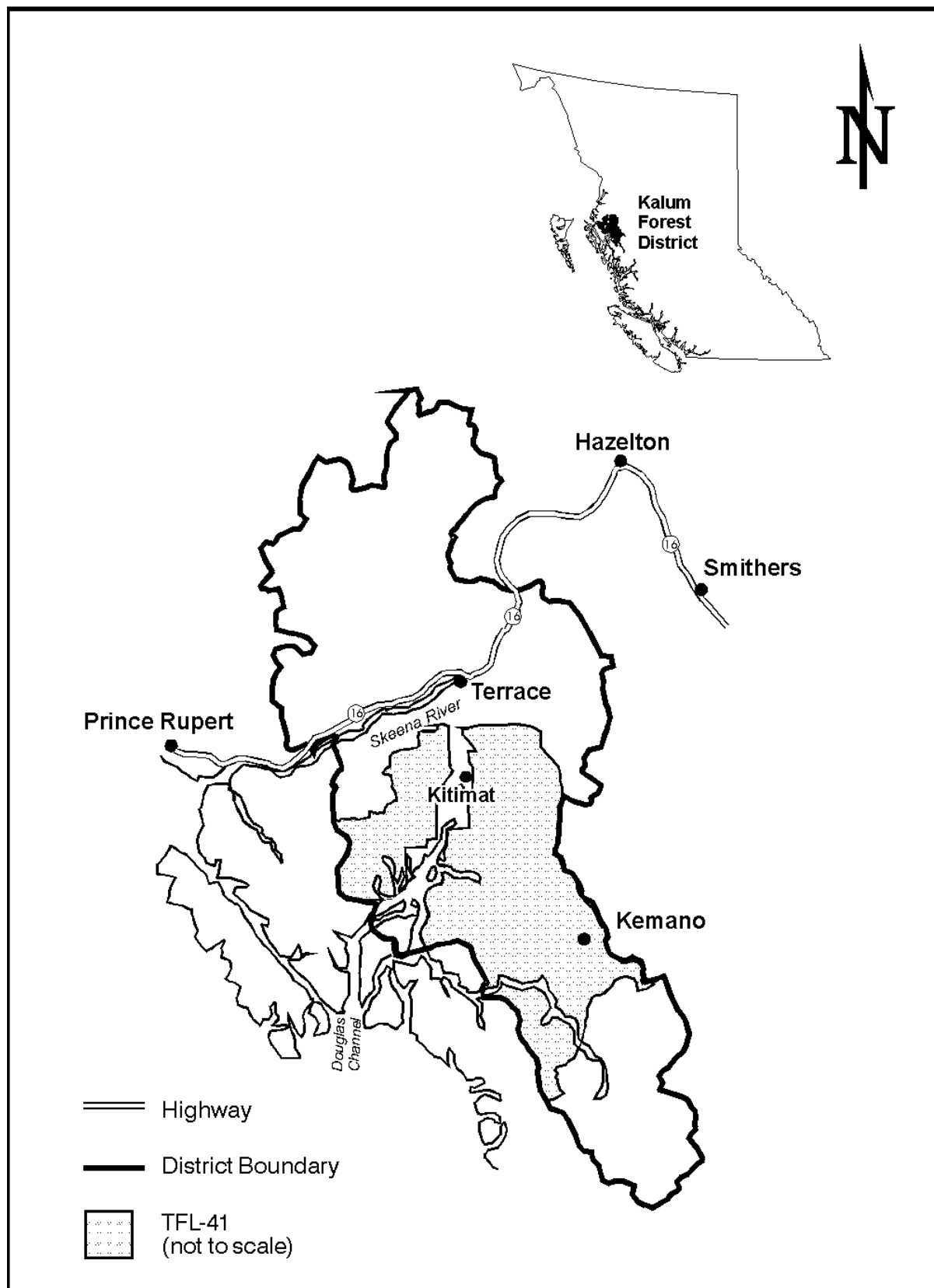
Sections 2 and 3 of this report from the auditor describe the audit work that formed the basis for reaching this qualified opinion. The audit was conducted in accordance with the auditing standards of the Forest Practices Board. Such an audit includes examining sufficient forest planning and practices to support an overall evaluation of compliance with the Code.

A handwritten signature in black ink, appearing to read "Jon Davies". The signature is fluid and cursive, with the first name "Jon" and last name "Davies" clearly distinguishable.

Jon Davies, CA  
Auditor

Victoria, British Columbia  
June 22, 1999

## Audit of West Fraser Mills Ltd. - TFL 41



## Endnotes

1. A forest development plan is an operational plan which provides the public and government agencies with information about the location and scheduling of proposed roads and cutblocks for harvesting timber over a period of at least five years. The plan must specify measures that will be carried out to protect forest resources (including water, fisheries, and other forest resources). It must also illustrate and describe how objectives and strategies established in higher level plans, where they have been prepared, will be carried out. Site specific plans are required to be consistent with the forest development plan.
2. A silviculture prescription is a site specific operational plan that describes the forest management objectives for an area to be harvested (a cutblock). The silviculture prescriptions examined in the audit are required to describe the management activities proposed to maintain the inherent productivity of the site, accommodate all resource values including biological diversity, and produce a free growing stand capable of meeting stated management objectives. Silviculture prescriptions must be consistent with higher level plans that encompass the area to which the prescription applies.
3. A logging plan is an operational plan that details how, when, and where timber harvesting and road construction activities will take place in a cutblock, in accordance with the approved silviculture prescription and forest development plan for the area. Information about other forest resource values, plus all current field information for the area, must be clearly shown in the logging plan.
4. A Riparian Management Area is an area adjacent to a stream, lake or wetland, consisting of a riparian management zone and, depending on the riparian class of the stream, lake or wetland, a riparian reserve zone. The Code's objectives for riparian areas are to minimize or prevent impacts of forest use on stream channel dynamics, aquatic ecosystems, and water quality, as well as on the diversity and sustainability of wildlife habitat and vegetation in these areas. Constraints to road and harvesting practices are applied within these zones, with the most stringent requirements for the riparian reserve zones.



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## NEWS RELEASE

For Immediate Release  
January 20, 2000

### West Fraser Mills' TFL near Terrace Gets Good Audit

Victoria - West Fraser Mills Ltd.'s forest practices in Tree Farm Licence 41 generally complied with the Forest Practices Code, according to a Forest Practices Board audit released today.

Only one instance of significant non-compliance with the code was identified. The tree farm licence is managed by the Skeena Sawmills Division of West Fraser and is south of Terrace, with operations in the Kitimat Valley, around the Douglas Channel and near Kemano. "This is a high degree of compliance, considering the difficult conditions in TFL 41," said board chair Keith Moore. "West Fraser operates in remote areas with steep terrain and many streams and rivers, most of which contain fish. There was a problem with two fish streams in one cutblock that were incorrectly classified, but overall, West Fraser did a good job of meeting code requirements."

The audit identified two other forest management concerns. These are not considered non-compliance with code requirements by West Fraser, but are important forest planning and practice issues.

West Fraser's forest development plan did not specify ways to protect important non-timber resources from the effects of forestry activities. "The board has recommended West Fraser specify measures to protect non-timber forest resources, such as wildlife habitat, in its forest development plans," said Moore. "And we recommend that government move quickly to legally establish higher-level plans under the code. This will assist West Fraser and other forest companies to address these important resources in their forest development plans." The audit also identified four old road systems with the potential to harm the environment. The roads are in unstable terrain and may cause landslides. The roads were built before the code was enacted in 1995, and therefore West Fraser is not legally responsible under the code for maintaining or deactivating them. The board has recommended that the government and West Fraser address the stability of these road systems.

The audit examined the activities of West Fraser, carried out between September 1997 and September 1998, in operational planning (including forest development plans, silviculture prescriptions and logging plans), timber harvesting, silviculture, fire protection and construction, maintenance and deactivation of roads.

Tree Farm Licence 41 was selected for audit randomly, not on the basis of location or level of performance. Since 1996, the board has undertaken 31 forest practices compliance audits. This is the 24th audit report to be published.

The Forest Practices Board is B.C.'s independent watchdog for sound forest practices. The board provides British Columbians with objective and independent assessments of the state of forest planning and practices in the province, compliance with the code, and the achievement of its intent.

The board's main roles, established under the Forest Practices Code, are auditing forest practices, undertaking investigations in response to public complaints, investigating any code-related forestry issues, participating in administrative reviews and appeals and providing reports on board activities, findings and recommendations.

- Investigating public complaints.
- Auditing government enforcement of the code.
- Auditing forest practices of government and licence holders on public lands.
- Undertaking special investigations of code-related forestry issues.
- Participating in administrative reviews and appeals.
- Providing reports on board activities, findings and recommendations.

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#### West Fraser Mills Ltd. - TFL 41

The audit examined West Fraser's operational planning (including forest development plans, silviculture prescriptions, and logging plans), timber harvesting, road activities, silviculture and fire protection for the period September 1, 1997, to September 1, 1998.

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