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MAR 25 2013

Al Gorley, RPF
Forest Practices Board
3rd Floor, 1675 Douglas Street
PO Box 9905 Stn Prov Govt
Victoria, British Columbia
V8W 2G5

Dear Al Gorley:

Re: Special Investigation Report 33 – Reporting the Results of Forestry Activities, Compliance with Section 86 of the Forest Planning and Practices Regulation

On behalf of the Ministry of Forests, Lands and Natural Resource Operations (FLNRO), please accept this letter as government's response to the recommendations and findings in the Forest Practices Board's Special Investigation Report 33 – Reporting the Results of Forestry Activities, Compliance with Section 86 of the Forest Planning and Practices Regulation (revised December 2011).

Recommendation 1
Government should immediately make legislative, policy and information management system changes required to implement a reporting system for construction and deactivation of roads outside of cutblocks.

A *Natural Resource Road Act* (NRRA) Policy Group comprised of a large and diverse range of resource sector road users is actively engaged in analyzing outstanding policy issues and will make recommendation to Cabinet on the legislative and policy changes required to address these and other road-related issues. The NRAA project is on track to make recommendations to Cabinet on moving forward with legislations and regulations early in the mandate of the new government.

One of the project goals is to provide an opportunity to streamline information and data management including the reporting of construction and deactivation of roads outside of cutblocks. Extensive stakeholder engagement continues, a business innovation team has been

Ministry of Forests, Lands and Natural Resource Operations
Office of the Deputy Minister
Location:
3rd Floor, 780 Blanshard Street
Victoria, BC V8W 2H1
Mailing Address:
PO Box 9352 Stn Prov Govt
Victoria BC V8W 9M1
Tel: (250) 952-6500
Fax: (250) 953-3687

involved, and a new business process and computer applications for reporting should be in place by March 2015. There are no plans to implement off-block road reporting prior to this date.

RESULTS could be used to capture off-block road construction and deactivation. However, given the timelines for development and implementation, it would in the end overlap and duplicate the NRRA work.

Recommendation 2

The forest ministry should conduct a needs analysis to evaluate the current status of reporting under Section 86 of the FPPR, and institute any design, re-design, improvements and/or simplifications that are warranted.

Response by Government

Resource Practices Branch (RPB) is proactively hosting application planning sessions on an annual basis. The last session was held on September 21, 2012, and focused on evaluating system priority maintenance items and needs for future development. The planning sessions included representatives from IMB (application), RPB (business), software developers, district users (both operational staff and technical staff) and data analysts. The ministry's business transformation initiative aims to consolidate natural resource sector applications and business areas, therefore, RPB is focussing on keeping our current system stable and functional while placing more emphasis on developing new reporting capabilities via business intelligence tools and the dashboard concept.

With respect to system redesign and streamlining, FLNRO has addressed the Board's suggested improvements (Appendix 3) regarding wildlife tree retention areas by reducing the number of acceptable reserve codes, and expiring unnecessary codes. Along with updates to key reserve related reports planned for fiscal 2013/14, these changes will resolve the significant problems identified by the Board. The system improvements and reserve code retirement enables better alignment of the business processes with RESULTS and eliminates redundancies. A published guide for reporting retention and training material is also available to assist users with the reporting.

In an effort to align RESULTS with VRIMS business requirements, new forest cover validation rules in RESULTS now ensure that all minimum data required for forest cover updates is captured via edit rules for both ESF (Electronic Submission Framework) data submissions and online updates.

In order to supply the FLNRO with key outcome indicators on performance, we are currently developing a proof of concept for two key reports (1) billing volume scaled (waste); and (2) compliance reporting of forest cover at regen and free growing milestones. The reports are being developed in Jasper Soft environment and are the first business intelligence reports with drill down functionalities to be built by FLNRO. Moving forward, this tool will enable the extraction of data from a number of key business areas to produce low-cost and efficient reporting on the ministry's progress on achievement of goals and objectives and allow us to monitor impacts from land use decisions and practices.

All RESULTS Business Documentation is routinely reviewed and updated to ensure the mandatory data submission requirements meet the legal, business and user requirements. The review cycle is approximately every two years. The latest review cycle produced a new version of the RESULTS Submission Specifications (Woodlot Licensee) and RESULTS Submission Specifications (Government Funded Activities).

Recommendation 3

The forest ministry should move towards a less expensive, more flexible option for development and maintenance of the reporting system.

Response by Government

The FLNRO continuously strives to develop and maintain systems that offer options and allow all persons who are required to report forest activities to meet their legal requirements as cost effectively as possible. RESULTS is more than a reporting system for forest activities; it has also replaced other paper-based business processes including site plan amendments, requests for extra funding, or relief of free growing obligation (FRPA Section 108) and declarations.

Keeping in line with the business transformation, a long term strategy to strongly position ourselves as leaders of information management in the natural resource sector is being initiated in partnership with IMB. FLRNO is focussed on improving efficiency of our operations and this could include consolidating natural resource business areas and related reporting and tracking applications. We look forward to keeping the Forest Practices Board apprised of our strategy and business reporting improvements as they unfold.

Recommendation 4

In the near term, until recommendations 2 and 3 are acted upon, the forest ministry should implement a comprehensive quality control system for reports filed under Section 86; including changes to RESULTS that would enforce submission of basic legal requirements of the Section and they should improve the documentation for RESULTS and enhance training opportunities for users.

Response by Government

In September 2011, the FLNRO hired a third party consultant to develop and manage the RESULTS Monitoring and Data Quality Assurance Project.

A RESULTS QA Protocol was developed, tested and employs refined queries focused on identifying high priority data quality issues in RESULTS where submissions do not meet legal reporting requirements and relevant data quality standards. As of December 2012, all districts have participated in this project. The interim target for this project is to reduce high priority data quality issues to less than five percent for all districts by March 31, 2013. This interim target has now been reached by nine districts. Cooperation from district staff and licensees has been excellent. Further, a performance measure for RESULTS data quality has been introduced to our 13/14-15/16 Ministry Service Plan.

The FLNRO is currently conducting an audit on free growing survey field data capture. The objective of the audit is to ensure that the free growing forest cover data reported to

RESULTS meets the Chief Forester Submission Specifications and the Survey Standards for Assessment of free growing and associated stocking standards.
We are also in the process of engaging with the ABCFP to ensure its members are aware of their professional responsibilities as well as their employers' and clients' legal obligations and, as such, are prepared to submit their information to the FLNRO consistent with the requirements of Section 86 of the FPPR.

In order to achieve and maintain our standard for data quality assurance and ensure we have qualified and competent users, we will continue to deliver the required training. As business and legislation evolves, so does the application and related reporting requirements. RPB will ensure that all business documentation, training material and communication are up to date.

We have implemented a training plan that addresses the need for training based on job functions. We are offering one-on-one custom sessions via Live Meeting aimed at delivering training based on specific job functions and individual needs. All training sessions are recorded and are available on our Live Meeting site along with associated training material. We also deliver online training modules catered to our various program areas on an ongoing basis. We currently host over 14 online core training modules for specific business areas and roles. We continuously advertise and encourage users to access the RESULTS training opportunities on the website.

In closing, the FLNRO appreciates the Forest Practices Board's recommendations regarding the reporting of forestry activities under Section 86 of the FPPR. We trust the Board will be satisfied with the initiatives and action plans we have in place to address the key issues identified by the Board.

If the Board has any questions regarding this response or requires more information, please contact Paul Rehsler at 250-387-8627 or Caroline MacLeod at 250-356-2094.

Yours truly,



Doug Konkin
Deputy Minister

Forest Practices Board

File: 97325-20-2010-01

May 15, 2013

Dave Peterson
Acting Deputy Minister
Ministry of Forests, Lands,
and Natural Resource Operations
3rd Floor – 780 Blanshard Street
Victoria, BC V8W 9M1

Dear Dave Peterson:

Re: Response to FPB Recommendations – Reporting the Results of Forestry Activities, Compliance with Section 86 of the Forest Planning and Practices Regulation

Thank you for your letter of March 25, 2013 in response to the Board's recommendations from our December, 2011 special investigation report "*Reporting the Results of Forestry Activities, Compliance with Section 86 of the Forest Planning and Practices Regulation*". The Board recognizes that MFLNRO has taken a number of steps to address the recommendations in our report and intends to continue to improve RESULTS over time.

The Board will follow your progress with interest, recognizing concerns that still need to be addressed over time – such as the nine year backlog in unreported roads and the need for improvements in reporting of Wildlife Tree Retention Areas. I also note the continued reliance on training rather than software controls to ensure legally compliant submissions. Given this, the Board reiterates the importance of continual training as staff turns over and is concerned that very little live RESULTS training is done anymore.

We now consider this investigation closed.

Sincerely,

R.A. (Al) Gorley, RPF
Chair