



**Forest  
Practices  
Board**

**Audit of Recreation Management and  
Enforcement in the Central Cariboo  
Forest District**

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**FPB/ARC/116**

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# Executive Summary

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As part of the Forest Practices Board's 2008 compliance audit program, the Board randomly selected the Central Cariboo Forest District and decided to audit forest recreation management and enforcement.

This is the Board's first audit focused exclusively on forest recreation management and enforcement. The audit encompassed the following aspects:

- recreation resource management;
- recreation use management, including sites and trails; and
- recreation enforcement.

Overall, auditors found generally good performance for recreation management activities in the district, noting that forest practices in the vicinity of recreation sites and trails complied with the legislation in all significant respects. As well, authorized recreation sites and trails were generally well maintained, with resource features protected.

Although the audit found a complicated arrangement of recreation compliance monitoring and enforcement responsibilities among agencies, the overall enforcement of recreation activities was found, with one exception, to be appropriate. The exception reveals a significant gap in government's enforcement with respect to unauthorized mountain bike trails. Within the forest district, and specifically around the area of Williams Lake, there are hundreds of unauthorized trails that are actively being promoted locally, as well as through Tourism BC ([hellobc.com](http://hellobc.com)) which states:

*"The vast network of trails in and around Williams Lake, De Sous Mountain and Farwell Canyon ... are fast becoming known as one of BC's best-kept secrets by mountain biking clubs and enthusiasts."*

The lack of coordination and effectiveness among government agencies in addressing unauthorized trails will continue to hamper effective enforcement.

Subsequent to the audit field work, government initiated a new approach to multi-ministry compliance and enforcement through the Integrated Land Management Bureau (ILMB) Board's Resource Management Coordination Project (RMCP). This initiative is designed to enhance collaboration and coordination of natural resource management activities across several ministries. For compliance and enforcement, the project is set up to share resources across ministry and program lines to inspect and enforce.

Also subsequent to the audit field work, the Ministry of Tourism, Culture and the Arts (MTCA) has been successful in legally establishing one of the trail systems and continues to work on legally establishing more of the unauthorized trails within the district.

## Board Commentary

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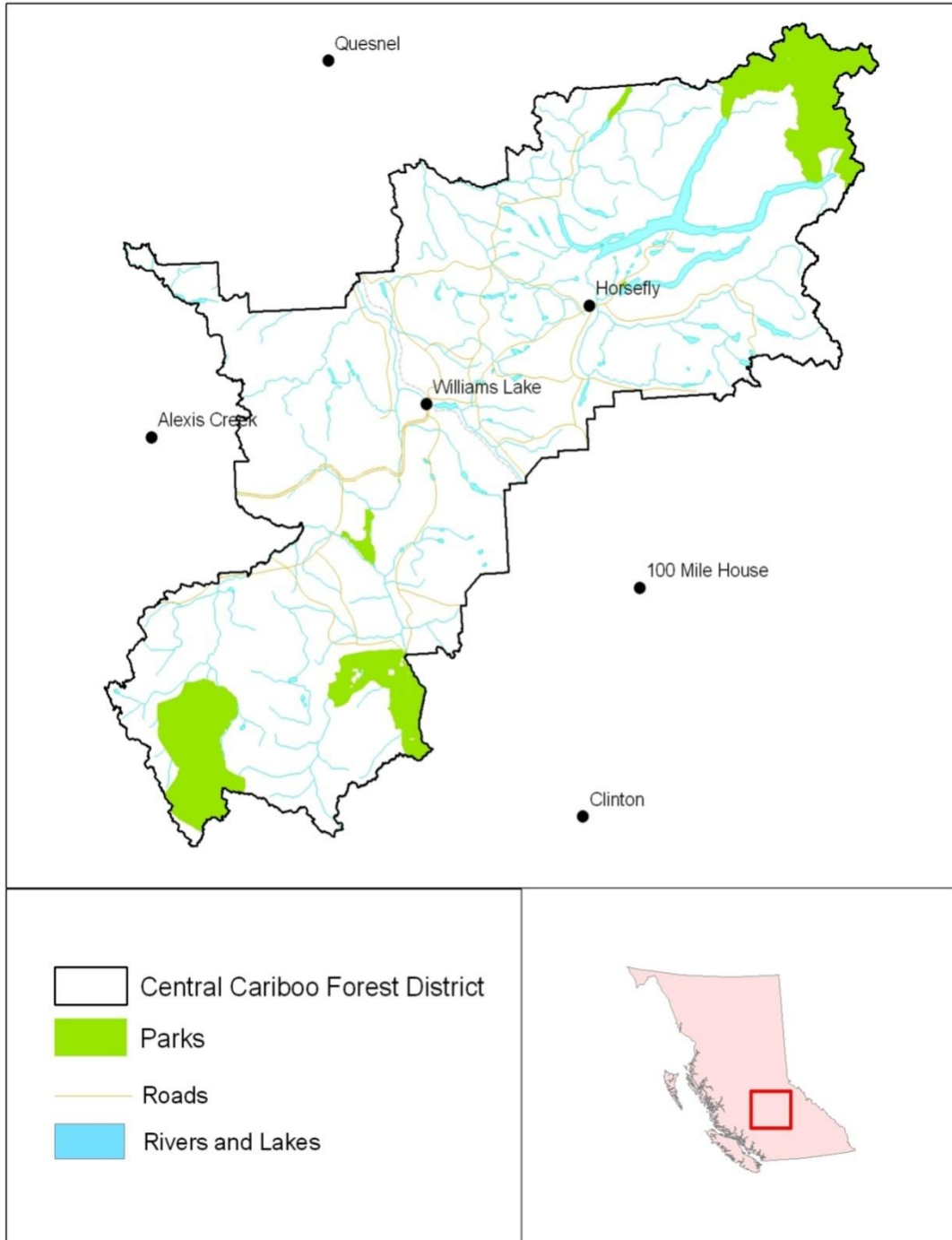
The issue of forest recreation management and enforcement is complex. When speaking of alternative uses of forest resources, there are often conflicting priorities. In forest recreation, the Board's mandate is limited to activities that fall within the *Forest and Range Practices Act (FRPA)*, such as the management of recreation sites and trails, protection of recreation values during forest practice activities, as well as the construction of unauthorized trails. However, the Board realizes that government and society in general must balance the use of a forest resource, such as the safety concern about an unauthorized mountain bike trail versus the benefit of the economic stimulus that offering the outdoor experience of mountain biking on difficult and challenging trails can bring to a community.

The Board acknowledges the delay in reporting the results of this audit, given the many changes in this area since the fieldwork was conducted in August, 2008. Subsequent to the field audit, the overall management and specifically the enforcement of recreation sites and trails, including unauthorized trails, has continued to evolve. The Board encourages government to continue to move toward greater coordination of overall recreation enforcement through the RMCP.

In addition, the Board hopes that government will continue to develop and implement its draft *Trails Strategy for British Columbia*, which is a coordinated strategy to address the issue of unauthorized trails. The Board also encourages MTCA to continue to work toward legalizing these trails and ensuring they are properly managed and meet appropriate standards.

The Board will continue to monitor these issues, including the effectiveness of the RMCP process, through future enforcement audits involving forest recreation management.

# Audit of Recreation Management and Enforcement in the Central Cariboo Forest District



# Audit Results

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## Background

As part of the Forest Practices Board's 2008 compliance audit program, the Board randomly selected the Central Cariboo Forest District (the district) and decided to audit forest recreation management and enforcement. Recreation management was selected because of the numerous recreation sites and trails within the district and because the Board has not previously examined recreation management. The district was not selected on the basis of location or past performance. Information about the Board's audit process is provided in Appendix 1.

The district is located in the central portion of the province (refer to the map on page 3). Principal communities within it include Williams Lake and Horsefly. Recreation sites and trails are scattered throughout the district.

The main forest recreation aspects that were assessed during the course of this audit come from FRPA and related regulations. These are:

- a) protecting forest recreation values in operational plans and during forest activities such as road building and harvesting;
- b) enabling objectives to be set for designated recreation sites, trails and interpretive sites;
- c) prohibiting unauthorized construction of trails or recreation facilities on Crown land;
- d) protecting recreation values or uses in key areas of Crown land by restricting or prohibiting a non-recreational use;
- e) in the *Forest Recreation Regulation*, establishing appropriate uses and activities at designated recreation sites and trails; and
- f) the appropriateness of government's enforcement of these recreation aspects.

## Recreation site and trail management history

Under the former *Forest Practices Code of British Columbia Act* (the Code), the Ministry of Forests and Range (MFR) had a key role in management of forest recreation, including responsibility for management of Forest Service recreation sites and trails. Recreation sites and trails were legally established under the Code and carried forward under FRPA.

In 2002, government decided MFR would no longer be responsible for funding the maintenance of Forest Service recreation sites and trails. All Forest Service recreation sites and trails were to be transferred to other agencies and organizations, or closed by March 31, 2004. Partnerships were sought out to continue to deliver the recreation program with user groups or other levels of government. In June 2005, the Ministry of Tourism, Sport and the Arts (MTSA) was created and made responsible for tourism and resort development. In January 2006, MTSA took over responsibility for recreation sites and trails from MFR. MTSA was transferred the responsibility for recreation management under FRPA, along with some, but not all enforcement powers. MFR has retained full enforcement power for forest recreation under FRPA. In 2008, MTSA was reorganized and its name changed to the Ministry of Tourism, Culture and the Arts (MTCA).



A loon on Abbot Lake.

Opportunities for outdoor recreation are provided by the province's 1,240 recreation sites and 650 trails. MTCA works with partners such as recreation clubs, forest companies, First Nations, local governments, contractors and other groups to manage and maintain recreation sites and trails. The sites are still owned by the province, but the partners operate the sites and may collect fees.

### **The recreation planning framework in the Central Cariboo Forest District**

Under FRPA, legal direction for recreation management is given through plans, objectives and orders. Land use plans, established recreation sites and trails, and ministerial orders form the recreation planning framework.

The audit examined recreation values by planning level:

- land use plans;
- established recreation sites and trails; and
- ministerial recreation orders.

#### **Land Use Plans**

The Cariboo-Chilcotin Land Use Plan (CCLUP) applies to the entire audit area and is a higher level plan<sup>1</sup>. CCLUP contains *Special Resource Management – Recreation and Tourism* management zones. It also contains both legal and non-legal provisions, which are outlined

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<sup>1</sup> Order declaring the Cariboo-Chilcotin Land and Resource Management Plan to be a Higher Level Plan pursuant to section 1(1) of the Forest Practices Code of British Columbia Act, effective January 31, 1996.

in the *Summary of CCLUP Legal Requirements and Selected Non-Legal Direction* dated May 2005. There are no direct legal objectives for recreation sites and trails within CCLUP. However, there are indirect and non-legal provisions.

To support the implementation of the CCLUP, eight sustainable resource management plans (SRMPs) were created. In the audit area, three SRMPs apply, namely: Williams Lake<sup>2</sup>, South Chilcotin<sup>3</sup> and Horsefly<sup>4</sup>.

There are many trails referenced in these SRMPs. However, the guidance put forward in SRMPs is not legally enforceable because SRMPs are considered to be policy as opposed to being documents that contain legal objectives, such as higher level plans. At their own discretion, forest licensees may address CCLUP objectives by incorporating the advice from the SRMPs.

The audit examined forest licensee operations in the vicinity of known recreation values, primarily SRMP trails.

### Established Recreation Sites and Trails

Recreation sites and trails and any associated objectives, are formally established under FRPA, or carried forward from previous establishments under the Code. MTCA manages 55 recreation sites and seven recreation trails in the audit area.

The audit examined established recreation sites and trails for compliance with FRPA and the *Forest Recreation Regulation*.

### Ministerial Orders

Under section 58 of FRPA, the minister may protect recreation resources by restricting or prohibiting non-recreation use, or recreation use. There are two recreation orders in place in the district. One order, which restricts motorized use, is for the Williams Lake River Valley Trail.

A second order, which restricts motorized summer recreation use, is for Yanks Peak.



Notice restricting motorized vehicle access to trail.

<sup>2</sup> Williams Lake SRMP - [http://ilmbwww.gov.bc.ca/slrp/srmp/north/williams\\_lk/index.html](http://ilmbwww.gov.bc.ca/slrp/srmp/north/williams_lk/index.html)

<sup>3</sup> South Chilcotin SRMP - [http://ilmbwww.gov.bc.ca/slrp/srmp/north/south\\_chilcotin/index.html](http://ilmbwww.gov.bc.ca/slrp/srmp/north/south_chilcotin/index.html)

<sup>4</sup> Horsefly SRMP - <http://ilmbwww.gov.bc.ca/slrp/srmp/north/horsefly/index.html>



The audit examined the areas covered by these orders for compliance with FRPA and the *Forest Recreation Regulation*.

## **Audit Approach and Scope**

MTCA administers recreation sites and trails as part of its Quesnel Central Cariboo Recreation District, which encompasses both the Central Cariboo Forest District and the Quesnel Forest District. The audit examined recreation in the Central Cariboo Forest District only.

The Board conducted a full scope audit examining recreation resource management, recreation use management, and recreation enforcement with respect to FRPA and the *Forest Recreation Regulation*. All recreation-related activities that took place between August 1, 2006, and August 15, 2008, in the Central Cariboo Forest District, were included in the scope of the audit. These were:

1. Recreation Resource Management - Forest operations (harvesting) near SRMP trails were examined to assess compliance with FRPA and related regulations.
2. Recreation Use Management - Recreation sites and trails were examined for compliance with FRPA and related regulations. This includes established recreations sites and trails, including Ministerial Orders, as well as unauthorized mountain bike trails.
3. Recreation Enforcement - The appropriateness of governments' enforcement of recreation use was assessed with respect to FRPA and the *Forest Recreation Regulation*. The audit examined compliance and enforcement activities, which includes MFR's administration of forest stewardship plan approvals and enforcement activities, MTCA's compliance monitoring and enforcement on sites and trails, and the Ministry of the Environment (MOE) Conservation Service's participation in enforcement of recreation-related issues.

The Board's audit fieldwork took place from August 11 to August 15, 2008.

The Board's audit reference manual, *Compliance Audit Reference Manual, Version 6.0, May 2003*, and the addendum to the manual for the 2008 audit season, set out the standards and procedures that were used to carry out the compliance portion of the audit. The Board's audit reference manual, *Enforcement Audit Reference Manual, Version 1.0, May 2002* sets out the standards and procedures that were used to carry out the enforcement portion of the audit.

## Recreation Resource Management

### Planning and practices examined

Under FRPA, licensees are required to manage forest resources under a forest stewardship plan (FSP). The FSP outlines how the intended results or strategies for objectives set by government, and other objectives established under FRPA such as those established for recreation sites and trails, will be met. In the audit area, the FSP must adhere to the CCLUP.

Supporting the CCLUP are several SRMPs which are not legally binding, but which incorporate strategies to meet the CCLUP's intent. The audit identified 23 cutblocks with external boundaries overlapping recreation trails identified in the SRMPs. Nine of these cutblocks had harvesting completed or ongoing and the audit reviewed six of them in the field. Recreation trails were reviewed to assess compliance with the licensee's commitments in their FSPs.

### Recreation management findings

Although only three of the six cutblocks audited had trails that the auditors could identify on the ground, all cutblocks were managed in compliance with the appropriate FSP.

The audit samples indicated that many of the trails shown on the SRMP maps as requiring buffers do not seem to exist or are mapped in the wrong location. This is a potential weakness in government's overall management of recreation trail resources that could be addressed with a revised inventory of such features. Nonetheless, the audit found that forest operations in the vicinity of mapped recreation sites and trails were compliant in all significant respects with the requirements of FRPA and related regulations.

## Recreation Use Management

### Planning and practices examined

Within the Central Cariboo Forest District, MTCA manages 55 established recreation sites and 7 trails. Two of the seven trails also have Ministerial Recreation Orders in place (see Table 1).

**Table 1: Audit population and sample audited**

Established Site or Trail	Population*	Sample**	Coverage
Sites	55	23	42%
Trails	7	7	100%

\* Some trails are actually recreation sites under FRPA but the main feature is actually a trail. The audit considered trails as a sub-population.

\*\* Samples were chosen in accordance with the audit reference manual. The audit team selected a larger proportion of higher risk sites (containing more or higher resource values), while ensuring that all risk categories were adequately sampled.

Along with the seven established recreation trails, there are hundreds of mountain bike trails throughout the district, most of which have not been authorized by government.

Hikers, dirt bikers and all terrain vehicle riders also use many of the same trails. In the Williams Lake area, there are four well-known mountain biking areas: Southside, Westside (also known as the Esler subdivision), Fox Mountain and De Sous Mountain. None of the approximately 100 trails in these riding areas have been legally established as recreation trails. Except for two trails on Fox Mountain, government has not authorized anyone to construct or maintain these trails under the *Forest and Range Practices Act*.

These riding areas are promoted by the City of Williams Lake and the local cycling club, as well as by Tourism BC, as places to ride a mountain bike in Williams Lake. On the Tourism BC (hellobc.com) website, under the heading “Williams Lake Mountain Biking” it states:

“There are more than 200 mountain bike trails in Williams Lake. The vast network of trails in and around Williams Lake, De Sous Mountain and Farwell Canyon have options for riders of all skill levels and are fast becoming known as one of BC’s best-kept secrets by mountain biking clubs and enthusiasts.”



De Sous Mountain Bike Trail.

The audit work on selected sites and trails included both ground-based and some aerial assessments using a helicopter.

## Recreation use findings

### Recreation Sites

In general, recreation sites were well maintained with riparian and other resource features protected, and were found to be in compliance in all significant respects with the requirements of FRPA and related regulations.



Chimney Lake recreation site.

Although safety is not directly related to FRPA, the audit did note trees with structural weaknesses (dead trees, dead limbs etc.) within 1.5 tree lengths of recreation facilities such as tent pads, picnic tables and outhouses on 9 of the 23 sites examined.

Although MTCA conducted harvesting operations on several sites to deal with mountain pine beetle killed trees, danger trees continue to be an ongoing issue.

### Established Recreation Trails

In general, the established recreation trails were maintained in a safe condition with riparian and other resource features protected and were found to be in compliance in all significant respects with the requirements of FRPA and related regulations.



Bull Mountain Ski Trail.

### Unauthorized Mountain Bike Trails

Section 57 of FRPA prohibits the construction, rehabilitation or maintenance of trails or facilities without authorization. Unauthorized trails can result in impacts to the environment, damage to forest resources,



A ramp and teeter-totter technical terrain feature (TTF).

impacts to licensed rights, risk to public safety, and wildlife disturbances. None of the hundreds of mountain bike trails in the audit area were authorized, yet most are used frequently during the riding season by both the public and commercial recreation tenure holders. Many of these trails contain technical trail features (TTFs) such as ramps, ladders and teeter-totter.

However, few trails met the most widely available safety standard for managing mountain bike trails, which

is the “Whistler Trail Standard,” so this raises concerns for public safety.

The Whistler Trail Standard sets out standards for trail ratings, signs, and construction and maintenance of TTFs.

These trails and TTFs were, and continue to be, built and maintained without authorization under FRPA. Many TTFs are nailed into live trees and FRPA prohibits that practice. Where timber has been harvested to build TTFs, it has been done without authorization.

Although the auditors did not observe significant examples of erosion or soil disturbance, likely due to the dry climate, this issue is considered significant due to the vast number of unauthorized trails and the continued risk to public safety. However, in the context of Board audits, the Board can only attribute this issue to the people that built these trails, and since these people are not considered a “party”<sup>5</sup> under FRPA, the Board cannot report this issue as a non-compliance. When these occurrences are discovered and investigated, the people responsible are rarely identified, so enforcement of this requirement is quite difficult.



A ladder supported by a board nailed into live trees.

## Recreation Enforcement

### Planning and practices examined

The audit examined the appropriateness of government’s enforcement of forest recreation activities with respect to FRPA and the *Forest Recreation Regulation* between August 1, 2006, and August 15, 2008. This includes activities of MFR, which has primary enforcement responsibility; MTCA, for compliance monitoring and enforcement of activities on sites and trails; and MOE’s Conservation Officer Service (COS) which participates in enforcement of forest recreation related issues.

The audit examined how the ministries addressed enforcement through the use of inspections; investigations of potential non-compliances; and how investigations dealt with unauthorized trail construction and maintenance.

Other than public safety on sites and trails, and some risk to environmental values, especially in alpine areas, the significance of recreation use infractions is generally minor. Gaps and inadequacies in recreation enforcement may not be significant when considering overall enforcement of forest practices legislation.

### Enforcement findings

The audit found a complicated arrangement of recreation compliance monitoring and enforcement responsibilities among agencies. Although MTCA is the primary agency

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<sup>5</sup> A “party” under FRPA includes government or a licence holder – not the general public.

involved in compliance monitoring, few enforcement powers have been delegated to MTCA staff. Most enforcement responsibilities have been retained by MFR staff with some undertaken by the COS. In its present form, the enforcement model for recreation is inefficient, complicated and potentially under-resourced, but fortunately that may be changing (see *Recent Developments*).

However, despite the complicated framework, there is reasonable compliance monitoring coverage of authorized recreation sites and trails by the three agencies. This level of inspection coverage of sites is adequate to monitor user compliance.

## **Unauthorized trails**

Section 57 of FRPA prohibits the construction, rehabilitation or maintenance of trails or facilities that are not government-authorized trails. As mentioned previously, unauthorized trails can result in impacts to the environment, affect other government licences such as range tenures, and endanger public safety.

In 2006, MTCA issued a draft policy statement entitled “Authorizing Recreational Mountain Biking Trails on Provincial Crown Land<sup>6</sup>”. In part, the policy stated that MTCA would assess discovered unauthorized mountain bike trails and:

- enter into an agreement with a local organization with capacity and interest to assume a management role. Failing that;
- establish the trail under FRPA, provided it met several criteria, including not having TTFs or posing other safety or environmental concerns, or
- take action, if resources permitted, to dismantle, undertake rehabilitation efforts or post an order prohibiting mountain bike use.

MTCA is taking an “amend into compliance” approach — trying to get bike groups to assume responsibility and bring the trails to acceptable standard so that MTCA could legally establish the trail. This may be a pragmatic way to manage the overall issue, but it does not effectively deter the practice of constructing unauthorized trails.

Discovery of unauthorized trails is left largely to public complaints. None of the agencies actively look for unauthorized trails in their compliance monitoring program. When unauthorized bike trails are made known through complaints from ranchers or the public, rather than assessing them, MTCA refers them to MFR for investigation.

Once investigated, MFR has removed structures on some sites but there does not appear to be any successful prosecution of persons involved. There is an inherent difficulty in identifying parties responsible for unauthorized trail construction since it is hard to catch them in the act.

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<sup>6</sup> Draft mountain bike trail policy: <http://www.sitesandtrailsbc.ca/documents/mountain-bike-policy.pdf>

With the rise in popularity of mountain biking and especially the construction of TTFs, government has become more concerned about unauthorized mountain bike trails. However, while MTCA and the MFR are working on finding solutions regarding how to deal with such trails, other government agencies, such as Tourism BC, are actively promoting the use of these unauthorized trails. Clearly the message to the public is inconsistent.

There is a lack of coordination and effectiveness among government agencies in addressing unauthorized trails. This hampers effective enforcement.

## Recent developments

The audit notes that subsequent to the field work conducted for this audit, in the fall of 2008, government initiated a new approach to multi-ministry compliance and enforcement as part of the RMCP. The RMCP is designed to enhance collaboration and coordination of natural resource management activities across several ministries. The project is set up to enable ministries to coordinate and share resources, and in the case of compliance and enforcement, address and manage broad government risk by having ministries cross ministry and program lines to inspect and enforce. The Board will monitor the effectiveness of this new approach through future Board audits.

Also in the fall of 2008, MTCA released a draft trails strategy for BC<sup>7</sup> and solicited comments until January 31, 2009. The strategy identifies a number of proposed actions to strengthen the framework of trail management, including mountain bike trails. The results of the review are not yet public, nor has the strategy been fully implemented.

In February 2009, one of the identified unauthorized trails in the Williams Lake area, Fox Mountain, had been officially established as an authorized recreation trail. Work to legally establish the Westsyde and De Sous Mountain trails is ongoing.

## Conclusion

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### Sites and Trails Opinion

In my opinion, the forestry activities near SRMP trails, as well as the authorized recreation sites and trails in the Central Cariboo Forest District, for the period August 1, 2006, to August 15, 2008, complied in all significant respects with the requirements of the *Forest and Range Practices Act* (FRPA), and the *Forest Recreation Regulation* as of August 2008.

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<sup>7</sup> Trails Strategy for British Columbia:  
<http://www.sitesandtrailsbc.ca/documents/provincial-trail-strategy-draft.pdf>

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.

The *Audit Approach and Scope* and the *Planning and Practices Examined* sections of this report describe the basis of the audit work performed in reaching the above conclusion. 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 FRPA.

## **Enforcement Conclusion**

Most compliance and enforcement practices relating to recreation requirements of the *Forest and Range Practices Act* (FRPA), and the *Forest Recreation Regulation* within the Cariboo-Chilcotin Forest District were appropriate between August 1, 2006 and August 15, 2008.

However, there is a large network of unauthorized mountain bike trails around Williams Lake and throughout the district that continue to pose a potential environmental risk as well as a public safety risk. I acknowledge the inherent difficulty in identifying parties responsible for unauthorized trail construction.

Notwithstanding the complicated framework in the district’s C&E practices, I conclude that, except for the lack of effective enforcement to deter the practice of building and maintaining unauthorized and potentially unsafe trails, the district’s enforcement of the *Forest and Range Practices Act* (FRPA) and the *Forest Recreation Regulation*, as of August 2008, is appropriate.

The audit acknowledges that government’s recent work on enforcement under RMCP may improve the enforcement model for recreation, however as this initiative began subsequent to the field audit, future Board enforcement audits will be required to assess this.



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Victoria, British Columbia  
March 11, 2010



# Appendix 1: Forest Practices Board Compliance Audit Process

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## Background

The Forest Practices Board conducts audits of government and agreement-holders under the *Forest and Range Practices Act* (FRPA), section 122, and the *Wildfire Act* (WA). Compliance audits examine forest or range planning and practices to determine whether or not they meet FRPA and / or WA requirements. (The transitional provisions of FRPA state that the Code continues to apply to forest practices carried out under a forest development plan, until there is an approved forest or range stewardship plan, at which point the requirements of FRPA apply.)

## Selection of auditees

The Board conducts about eight or nine compliance audits annually. Most of these are audits of agreement holders. The Board also audits the government's BC Timber Sales Program (BCTS). This section describes the process for selecting agreement holders to audit.

To begin with, auditors randomly select an area of the Province, such as a forest district. Then the auditors review the forest resources, geographic features, operating conditions and other factors in the area selected. These are considered in conjunction with Board strategic priorities (updated annually), and the type of audit is determined. At this stage, we choose the auditee(s) that best suits the selected risk and priorities. The audit selections are not based on past performance.

For example, in 2007, the Board randomly selected the Robson Valley Timber Supply Area as a location for an audit. After assessing the activities within that area, we discovered that two licensees had recently closed operations due to financial problems. As the Board has expressed concern in the past about financially strapped companies failing to meet outstanding obligations, such as reforestation, and road maintenance, the audit focused on the status of the outstanding obligations of these two licences.

For BCTS audits, a forest district within one of the 12 business areas within the province is selected randomly for audit.

## Audit Standards

Audits by the Board are conducted in accordance with the auditing standards developed by the Board. These standards are consistent with generally accepted auditing standards. The standards for compliance audits are described in the Board's *Compliance Audit Reference Manual*.

## Audit Process

### Conducting the Audit

Once the Board randomly selects an area or district and determines the scope of audit to be conducted and the licensee(s) to be audited, all activities carried out during the period subject to audit are identified (such as harvesting or replanting, and road construction or deactivation activities). Items that make up each forest activity are referred to as a population. For example, all sites harvested form the timber harvesting population and all road sections constructed form the road construction population.

A separate sample is then 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 areas where the risk of non-compliance is greater.

Audit field work includes assessments of features using helicopters as well as ground procedures, such as measuring specific features like riparian reserve zone width. The audit teams generally spend one to two weeks in the field.

### Evaluating the Results

The Board recognizes that compliance with the many requirements of the Code, FRPA and WA, is more a matter of degree than absolute adherence. Determining compliance, and assessing the significance of non-compliance, requires the exercise of professional judgment within the direction provided by the Board.

The audit team, composed of professionals and technical experts, first determines whether forest practices comply with legislated requirements. For those practices considered to not be in compliance, the audit team then evaluates the significance of the non-compliance, based on a number of criteria, including the magnitude of the event, the frequency of its occurrence and the severity of the consequences.

Auditors categorize their findings into the following levels of compliance:

**Compliance** – where the auditor finds that practices meet Code, FRPA and WA requirements.

**Not significant non-compliance** – where the auditor, upon reaching a non-compliance conclusion, determines that one or more non-compliance event(s) is not significant and not worthy of reporting. Therefore, this category of events will not be included in audit reports.

**Significant non-compliance** – where the auditor determines a non-compliance event(s) or condition(s) is or has the potential to be 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 one or many non-compliance events.

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 Minister of Forests and Range.

## **Reporting**

Based on the above evaluation, the auditor then prepares a draft audit report. The party being audited is given a draft of the report for review and comment before it is submitted to the Board.

Once the auditor submits the draft report, the Board reviews it and determines if the audit findings may adversely affect any party or person. 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. The representations allow parties that may potentially be adversely affected to present their views to the Board.

The Board then reviews the auditor's draft report and the representations from parties that may potentially be adversely affected before preparing its final report. Once the representations have been completed, the report is finalized and released: first to the auditee and then to the public and government.



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