

**Audit of Stream Riparian Management  
Wynndel Box and Lumber Company Ltd.  
FL A20214**

**Audit Report**



**FPB/ARC/73**

**July 2005**



## **Preface**

### **Pilot Effectiveness Audits**

*The 2004 Forest and Range Practices Act (FRPA) was intended to shift forest practices legislation from a prescriptive to a results-based approach. FRPA establishes objectives for various forest values, and requires licensees to develop forest stewardship plans that set out strategies or results consistent with these objectives.*

*Provincially, there is considerable work underway through various initiatives, such as the FRPA Resource Evaluation Working Group, towards interpreting and explaining FRPA's objectives in a way that can be understood and put into practice. The Board considers the development and application of criteria and indicators an appropriate means to address this challenge.*

*The Board anticipates applying criteria and indicators to facilitate results-based assessments of forest practices, and to explain audit findings in a way that can be understood by the general public and by forestry professionals. Pilot effectiveness audits are a key part of the process.*

*The main purpose of the pilot effectiveness audits is not just to determine compliance, but rather to work with auditees and government agencies to develop criteria and indicators that will help to assess effectiveness of forest practices on the ground.*

*In 2004, the Board published pilot effectiveness audits for soils and riparian values. In 2005, a pilot visuals audit and this second pilot riparian audit have been released. A pilot audit on biodiversity is planned for release in late 2005 or early 2006.*

*The experience gained from the pilot audits will be used to further the Board's approach under FRPA, so that future audits can provide assurance about the results of forest practices in relation to government's forest management objectives. The Board will also use these audit results to help develop effectiveness criteria and indicators for all FRPA forest values..*

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# Executive Summary

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In anticipation of the full implementation of the *Forest and Range Practices Act (FRPA)*, the Forest Practices Board is currently piloting audits that are designed to determine how to best assess forestry practices under results-based legislation. In 2003, two audits were conducted: Forest Soil Conservation in the Mackenzie Forest District and Stream Riparian Management in the Chilliwack Forest District. In 2004, an audit of visual resource management, and a second stream riparian management audit (the subject of this report) were carried out. This audit was completed using different criteria and indicators than the 2003 riparian audit.

Wynndel Box and Lumber Company Ltd. (Wynndel) is a privately owned company based in Wynndel, BC (approximately 10 kilometres north of Creston). Wynndel's traditional operating area is on the east side of Kootenay Lake near the town of Wynndel, and extending north to the south boundary of the Purcell Wilderness Conservancy. (See map page 4.)

The operating area covered by the audit is located in the Kootenay Lake Forest District of the Southern Interior Forest Region.

The audit examined Wynndel's operational planning, timber harvesting, and the construction and maintenance of stream crossings under FL A20214 for the period January 1, 2000, to September 30, 2004.

Because this is a pilot audit, the Board solicited auditee input concerning the audit methodology and the criteria. Appendix A contains Wynndel's comments regarding the draft report.

These practices were assessed for compliance with the *Forest Practices Code of British Columbia Act* and regulations (the Code) and the *Forest and Range Practices Act (FRPA)*, and in relation to criteria and indicators of stream properly functioning condition and stream crossing practices.

For the purposes of the audit, the proper functioning of streams was assessed based on checklists developed by the Ministry of Forests' Forest Resource Evaluation Program (FREP). A properly functioning condition checklist for forestry purposes was developed by a group of hydrologists and fisheries biologists.

The checklists used in the audit include 14 questions about the attributes of streams which, when considered in total, categorize stream reaches as either properly functioning; functioning at risk; functioning at high risk; or non-functioning.

## **Conclusions**

### **Effectiveness (Criteria and Indicators)**

Overall, with few exceptions, Wynndel's harvesting and stream crossing practices were consistent with the criteria and indicators.

Wynndel's harvesting practices are generally not impacting the properly functioning condition of streams. The few impacts observed resulted from windthrow and fire salvage, and were not excessive considering that Wynndel operates in an area with a substantial stream network, highly erodible soils, and recent large forest fires.

No overall conclusion is provided in relation to Wynndel's stream riparian management beyond site-level results, because the criteria and indicators applied relate only to the site level.

### **Compliance (Code requirements)**

Wynndel's harvesting and stream crossing practices complied with the Code requirements for riparian management. Wynndel correctly identified and classified the streams in proximity to their operations, prescribed appropriate harvesting activities in riparian areas, maintained riparian reserves consistent with legislated requirements, or greater, and conducted harvesting activities in accordance with their operational plans.

Wynndel's stream crossing practices employed appropriate sediment control measures to minimize the amount of sediment introduced into streams. Crossing structures were adequately sized, width of road running surfaces and right-of-ways were in accordance with approved plans, inlets and outlets were armored and exposed soils were re-vegetated.

## **Board Commentary**

This is the second stream riparian management audit completed by the Board using criteria and indicators to facilitate results-based assessments of forest practices. This audit has reaffirmed the application of criteria and indicators as a viable approach to assessing impacts to streams from site-level practices.

The audit, including the comments made by Wynndel, reaffirmed that further work is required to develop stream riparian management criteria and indicators that best serve the Board's purpose as an independent watchdog for sound forest practices. This audit demonstrates that assessing individual stream reaches, in isolation of landscape context or underlying forest management systems, restricts audit conclusions to site-level forest practices or those forest practices that are, by their nature, obvious. For example, the audit found that road crossing practices minimized sediment introduced to streams at the sites assessed; however, the criteria and indicators applied did not assess whether the number of stream crossings was minimized.

A criteria and indicator set that encompasses broader results than at the site level would better serve the Board's results-based evaluations. This would allow for a wider range of assessments, such as determining whether forest practices are minimizing sedimentation across licensees' entire operations. The FRPA objective related to stream riparian management - *to conserve, at the landscape level, riparian areas* – reinforces the need for Board audits to assess practices at both the site level and the landscape level, while taking into account multiple impacts on resource values such as streams, which are subject to many pressures other than forest practices.

For the Board to fully assess practices in relation to FRPA's riparian objective, the criteria and indicators applied need to address broader questions such as:

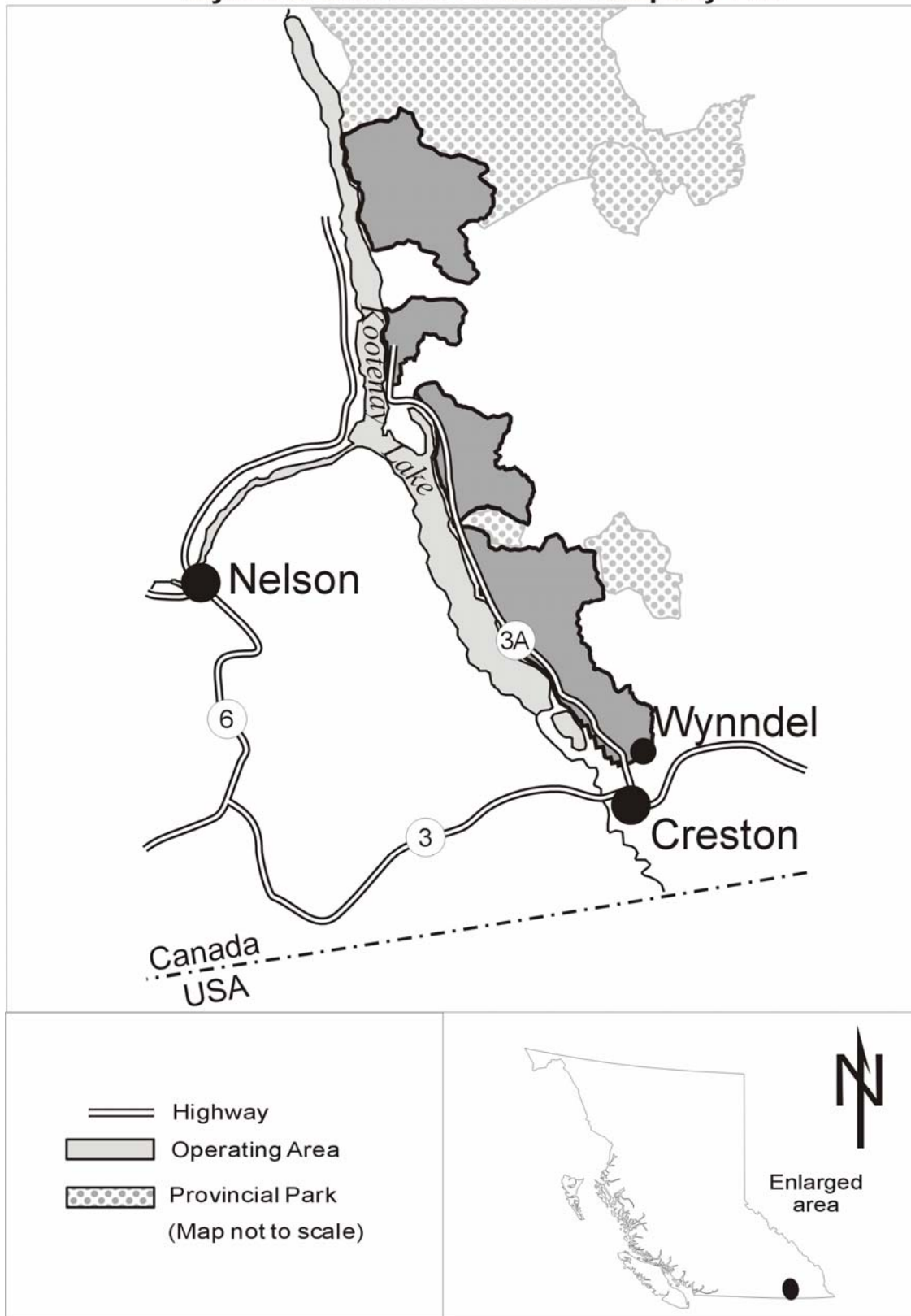
- How have landscape level objectives for riparian areas been established?
- Have the components of the overall management system designed to achieve the objectives been identified?
- Have appropriate forest practices been prescribed?
- Have results been measured and assessed in relation to the objectives?
- What do these results indicate about the achievement of the objectives?
- How are management practices being adapted to achieve objectives?

To answer these questions, Board auditors need to examine the forest management systems that underlie forestry practices, which are intended to ensure that forestry practices are conserving riparian values, as well as examining the results at the site level. The challenge for the Board is to define these 'core' system requirements and practices, through criteria and indicators that are not overly prescriptive and counter-productive within FRPA's results-based legislative framework; (i.e., the criteria and indicators need to provide for flexibility in practices and approaches to achieving FRPA's objectives).

As a next step in the continuing development of stream riparian management criteria and indicators, the Board plans to conduct a third riparian audit using a more comprehensive set of criteria and indicators, which will build on the two prior sets and encompass both site and landscape level practices, and core system requirements.

The Board would like to thank Wynndel and their staff for their cooperation and participation throughout this pilot audit.

**Audit of  
Stream Riparian Management  
Wynndel Box and Lumber Company Ltd.**



# Audit Results

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## Background

Wynndel Box and Lumber Company Ltd (Wynndel) was chosen from the population of forest licensees within the randomly selected Kootenay Lake Forest District. Wynndel is a privately owned company based in Wynndel, BC (approximately 10 kilometres north of Creston). Wynndel's traditional operating area is on the east side of Kootenay Lake near the town of Wynndel, and extending north to the south boundary of the Purcell Wilderness Conservancy.

The operating area is located in the Kootenay Lake Forest District of the Southern Interior Forest Region. The drainages in the operating areas originate from the Purcell mountain range and flow west into Kootenay Lake (see map on page 4).

The scope of the audit included Wynndel's operational planning, timber harvesting and the construction and maintenance of stream crossings under FL A20214, for the period January 1, 2000, to September 30, 2004. No stream crossings were deactivated during this period.

Approximately 400,000 cubic metres and 100 cutblocks were harvested by Wynndel during the audit period. Many of the forest activities were directly adjacent to fish streams or involved crossing over fish streams. The predominant soils in the operating area are highly erodible and much of the operating area is within community and domestic watersheds. Streams in community watersheds are default-classified as fish streams, and must be managed accordingly.

In 2003, part of the Wynndel operating area was burned by the 4,839-hectare Kuskonook wildfire. Another large fire burned in the Sanca Creek watershed in 2000. There have been considerable impacts to streams attributable to both the fires and fire suppression activities—equipment crossed through streams at many locations, and fireguards exposed substantial amounts of bare ground with direct connection to stream channels. Many rehabilitation measures have already been taken by the Ministry of Forests and Range, and rehabilitation continues beyond the audit period.

## Code Requirements

The major requirements of the Code applicable to stream riparian management include:

- correctly classifying streams according to their riparian classification;
- prescribing activities to manage and conserve riparian values; and
- completing forestry activities in a manner that protects riparian values.



Under FRPA, the objective set by government for water, fish, wildlife and biodiversity within riparian areas is to, without unduly reducing timber supply, conserve at the landscape level, the water quality, fish habitat, wildlife habitat and biodiversity associated with those riparian areas.

## **Audit Standards**

The audit was conducted in accordance with the auditing standards of the Forest Practices Board. Appendix B describes the audit objectives and methodology. Such an audit includes examining sufficient forest planning and practices to support overall conclusions about forest practices in relation to the criteria and indicators applied.

The audit team comprised:

Kevin Edquist, RPF

Derek Tripp, RPBio.

Chris Mosher, CA, CEA(SFM)

Chris Oman, RPF

Rob Thomson, RPBio.

## **Audit Approach: Properly Functioning Condition**

Proper Functioning Condition (PFC) is defined in the *Forest Practices Code of British Columbia Act* as the ability of a stream, river, wetland or lake and its riparian area to:

- withstand normal peak flood events without experiencing accelerated soil loss, channel movement or bank movement;
- filter runoff; and
- store and safely release water.

The *Riparian Management Area Guidebook* states that Properly Functioning Condition of riparian habitats will be maintained if the impacts of development on the attributes of the riparian areas are:

- on average, small or within the range of natural variability of the habitat; and
- are large and beyond the range of natural variability in no more than a small portion of the habitat.

The key underlying assumption is that if the range of impacts attributable to the management activity that affects the riparian habitat lies within the range of natural variability over most of the habitat, it is likely that the natural ecological functions of the habitat will be maintained.

## Development of Audit Criteria and Indicators

For the purposes of the audit, PFC was assessed based on checklists developed by the Ministry of Forests' Forest Resource Evaluation Program (FREP). The first application of a PFC checklist in British Columbia was assessing small streams potentially affected by range cattle (Ministry of Forests Method and the Montana Method). This properly functioning condition checklist for forestry purposes was developed by a multi-disciplinary expert group of hydrologists and fisheries biologists.

The checklists used in the audit include 14 questions about the attributes of streams which, when considered in total, categorize stream reaches as either properly functioning; functioning at risk; functioning at high risk; or non-functioning. Although not explicitly defined by FREP, this methodology defines PFC based on the stream attributes assessed.

**The indicators for the sedimentation criterion were created specifically for this audit.**

## Findings and Conclusions

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### **Criterion: The properly functioning condition of streams has not been impacted by forest practices.**

This criterion relates to determining whether forest practices are impacting the properly functioning condition of streams. The following indicators were applied on the stream reaches examined by the audit to facilitate assessments of PFC.

#### **Indicators:**

- channel beds are undisturbed
- channel banks are undisturbed
- channel large woody debris processes are undisturbed
- channel morphology is undisturbed
- all aspects of the aquatic habitat are sufficiently connected to allow for normal, unimpeded movement of fish, organic debris and sediments
- streams support a good diversity of fish cover attributes
- the amount of moss present indicates a stable and productive ecosystem
- the introduction of fine sediment has been minimized
- streams support a good diversity of aquatic invertebrates
- the vegetation in the riparian management area has been sufficiently protected from windthrow
- the amount of bare ground or soil disturbance in the riparian area has been minimized
- sufficient vegetation has been retained to maintain an adequate root network or large woody debris supply

- sufficient vegetation has been retained to provide shade and reduce bank microclimate change
- the number of disturbance indicator plants or noxious weeds present have been limited to a satisfactory level

The audit assessed PFC on 34 of 115 stream reaches in proximity to Wynndel's harvesting activities. The audit determined the pre-harvest functioning condition of the stream reaches by examining control sites (generally a representative reach directly upstream), and then assessed whether this condition had been impacted by harvest activities. High background levels of sand were frequently observed in control reaches. The audit found that:

- Harvesting activities did not impact PFC on 28 of the 34 stream reaches assessed.
- Harvesting activities impacted PFC on 6 of the 34 stream reaches assessed.
  - One stream changed from properly functioning to non-functioning
  - One stream changed from properly functioning to functioning at high risk
  - Two streams changed from properly functioning to functioning at risk
  - One stream changed from functioning at risk to non-functioning
  - One stream changed from functioning at high risk to non-functioning

On these six streams the impacts were caused by either:

- Windthrow, which affected stream channel banks, connectivity of aquatic habitat, level of fine sediments, diversity of aquatic invertebrates, and the amount of bare ground hydrologically linked to the stream. At these sites, the areas affected were localized and relatively minor in comparison to the total riparian area assessed.

Or,

- Salvage of burned merchantable trees in riparian management areas, which affected LWD processes and root networks. After wildfires burned through these areas, Wynndel harvested the reserves to salvage merchantable dead timber and reduce the potential for windthrow. At three of the locations where PFC was affected, streamside reserves had been prescribed despite no legislated requirement for reserves (NS4 class streams).

The audit found that harvesting practices were in compliance with the Forest Practices Code requirements for riparian management at all 34 sites examined.

## Conclusions

**Effectiveness:** Based on the indicator data collected, Wynndel's harvesting practices are not significantly impacting the properly functioning condition of streams.

**Compliance:** Wynndel's harvesting practices complied with the Code requirements for riparian management.

## **Criterion: Sedimentation has been minimized at road crossings**

Road crossings introduce sediments into streams. This criterion relates to minimizing the amount of sediment introduced.

### **Indicators:**

- stream crossings avoid areas where streams are highly active (meandering, braided or alluvial fans)
- where there is a potential for sediment delivery to streams, sediment control measures have been employed to reduce the risk of sediment delivery
- approaches are graded and cross ditched to reduce the risk of sediment delivery

There were 45 bridges or culverts greater than 800mm in the audit area. The audit assessed each of the above indicators at 30 of these crossings. The audit found that practices were consistent with the indicators. Streams were crossed at stable locations, and sediment control measures, grading and cross-ditching were employed to minimize the amount delivered to streams.

The audit found that stream crossing practices were in compliance with the Forest Practices Code requirements for bridges and culverts at all 30 sites examined. Crossing structures were adequately sized, width of road running surfaces and right-of-ways were in accordance with approved plans, inlets and outlets were armored and exposed soils were re-vegetated.

### **Conclusions**

**Effectiveness:** Based on the indicators assessed, Wynndel's stream crossing practices minimized sedimentation at road crossings.

**Compliance:** Wynndel's stream crossing practices complied with the Code requirements for bridges and culverts.

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<sup>i</sup> In January 2004 the *Forest and Range Practices Act* (FRPA) replaced the Forest Practices Code as British Columbia's forest practices legislation. FRPA will be phased in over a transition period ending on December 31, 2006 (with government authorized to extend the period until December 31, 2007). The transitional provisions of FRPA state the Code continues to apply to forest practices carried out under a forest development plan. This continues until there is an approved forest stewardship plan, at which point, the requirements of FRPA apply. Therefore, although FRPA came into effect near the end the audit period, the legislated forest practices requirements examined in this audit were the requirements of the Code.

**Appendix A: Response from Wynndel Box and  
Lumber Company Ltd.**

# Appendix A: Response from Wynndel Box and Lumber Company Ltd.

## Comments to FPB 2004 Stream Audit on Wynndel Box & Lumber Co. Ltd.

### Multiple use of road systems:

It is important to realize that Wynndel Box & Lumber Co. Ltd. (WB&L) and other companies with forest tenures are not the sole user of the road systems within respective operating areas, and solely responsible for all impacts to streams as a result of road use. Roads on Crown lands are unrestricted to the public and other resource users. Forest tenure holders have obligations for roads as defined in legislation under the Forest Practices Code Act of BC (FPCA) and associated regulations and under the Forest and Range Practices Act of BC (FRPA) and associated legislation. Tenure holders do not have any legal authority to control or restrict the use of public roads. We have an obligation to ensure our roads are maintained to address their safe use for industrial activities, and when not in use, they are maintained or deactivated to a degree to control water and erosion.

The Ministry of Forests (MoF) considers WB&L to be to prime user of road systems within our operating area. These road types range from:

- Forest Service Roads (FSRs): Are roads the Company have a licensed road use agreements with the Ministry of Forests (MoF). Under this type of agreement the Company is responsible for general maintenance of the road for drainage and stability whether or not we use the roads. There are many circumstances when the Company would like to employ maintenance techniques such as water barring or cross-ditching on these roads in order to manage water and erosion concerns. This may be considered inappropriate, as it will affect public access, and other industrial users may not be obligated to replace these structures once they are removed. The Company is only capable of managing its own road activities and of the agents that work for us.
- Operational Roads (ORs) are roads the Company builds under our Forest Licence with road permits. The Company has slightly more control with these roads to the degree of the type of maintenance employed to manage drainage and erosion; however, we cannot restrict access and use of these roads by other users unless the road is totally rehabilitated.
- Non-Status Roads (NSRs) are older, unmaintained road systems posted by the MoF as Wilderness Roads (WRs). These road systems are not maintained unless an industrial user takes one over, or applies for a 60-day use permit, in which

case the user must leave the road in a similar condition before use. Again, we cannot restrict access and use of these roads by other user users.

Most road systems on Crown land are generally available for public use. Unless these roads are tenured, damage to these road systems generally go as unchecked. WB&L prefers to seasonally or temporarily deactivate roads we are not actively using in order to reduce the effect of public use. This is not always possible with FSRs where the Company is considered the prime user and the public demands unrestricted access for recreation.

**Recent history:**

In 2001 and 2003 wild fires occurred in the Sanca Creek Community Watershed (one of our operating areas). Sanca Creek is fully accessed with active and deactivated roads. The fire protection branch of the Ministry of Forests took action on these fires using both inactive and active road systems as well as some older skid roads. Their ground activities used to suppress these fires impacted the streams by increasing sediment delivery. At the completion of the suppression activities the MoF took remedial actions to reduce the impacts of sedimentation. Some have worked immediately, and some will take years to fully address sediment delivery.

The intent of this discussion is to describe how difficult it is to manage water and sediment delivery when road systems are constantly being used, reopened and re-deactivated, and how much of this use is out of the Company's control.

Ronald J. Piva, RPF  
Woodlands Manager  
Wynndel Box & Lumber Co. Ltd.

## **Appendix B: Forest Practices Board Audit Objectives and Methodology**



# Appendix B: Forest Practices Board Audit Objectives and Methodology

## Background

The Forest Practices Board conducts audits of government and agreement-holders for compliance with the *Forest Practices and Range Practices Act* (FRPA), including the achievement of its intent. The Board has the authority to conduct these periodic independent audits under section 122(1) of FRPA. Most of the *Forest Practices Code of British Columbia Act* (the Code) was repealed on January 31, 2004 and replaced with FRPA. 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 stewardship plan, at which point the requirements of FRPA apply.

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 British Columbia Timber Sales (BCTS) program. Selection for audit, of both areas and licensees or agreement-holders to be audited, is made randomly to ensure a fair, unbiased selection.

## Objective

The objective of Board audits of forestry practices has changed with the introduction of FRPA. FRPA is more results-based than the Code. It focuses on setting forest management objectives for various forest values and relies on licensees and their professionals to achieve those objectives. It does not direct specifically how forestry activities are to be performed. Instead it requires licensees to ensure that results consistent with objectives are achieved. Board pilot audits therefore examine and provide assurance whether forest practices are achieving government's objectives. These assessments could be considered a form of effectiveness auditing, but include compliance assessments also.

## Criteria and Indicators

To facilitate the assessment of forest practices in relation to the achievement of government objectives, Board pilot effectiveness audits use criteria and indicators. Criteria and indicators provide an objective basis for evaluating the impact of forest practices on forest resources and assessing and reporting on the compliance of forest practices in relation to the achievement of objectives. Indicators are measures or descriptions of the condition of a forest resource. For example, one indicator for soil conservation is the percentage of a logged area that is occupied by permanent access structures. This is an indicator of the extent to which the amount of growing sites has been reduced due to construction of roads and landings. This could be one of a number of indicators used to assess whether forest practices are consistent with criteria related to government's objective to conserve the productive capacity of forest soils.

The Board uses criteria and indicators as a basis for gathering audit evidence, assessing practices in relation to objectives and reporting findings. The Board uses indicators developed by other credible sources, independent from the Board. The Board does, though, select the indicators it can use and in some cases may adapt indicators from other sources to facilitate audit. For the purposes of pilot audits, the Board uses indicators that enable it to assess the impact of forest practices and that are capable of being evaluated with the resources of an audit (e.g. the personnel and the time available).

## **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 audits determine compliance with the Code and FRPA, based on criteria derived from those Acts and related regulations. 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*. The standards and procedures for pilot audits of forestry practices utilizing criteria and indicators are currently under development.

## **Audit Process**

### **Conducting the Audit**

Once the Board randomly selects an audit licensee and area, 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'. The populations are then sub-divided based on factors such as characteristics of the sites, criteria applicable, and potential severity of the consequences of non-compliance on the sites.

For each population within each criteria applied by the audit, the auditors choose the most efficient means of obtaining information to conclude whether the forestry practices have achieved the criteria applied, including compliance with the legislation. 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 and 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 assessing the effectiveness of forestry practices, including compliance with the many requirements of forestry legislation, is more a matter of degree than absolute achievement. Determining effectiveness and assessing 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 and FRPA 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.

The audit team then determines whether forest practices have achieved the criteria applied. The data collected for each of the indicators is analyzed in relation to each criterion applied by the audit. Board auditing standards require sufficient appropriate audit evidence be collected to support an overall conclusion about forest practices in relation to each criterion applied. Where necessary, depending on the complexity and magnitude of findings of the audit, the audit team will facilitate a discussion of the audit results with the auditee. This discussion can take several forms and is intended to ensure that the auditee is fully aware of the results of audit findings, and provides an opportunity for the auditee to present further information about the audit findings and to ensure the audit team has complete and correct information.

## Reporting

The first step in the audit reporting phase of these pilot effectiveness audits is facilitating a workshop attended by the parties audited, local resource agency managers, the auditors and the Board Chair. The workshop includes discussing the audit results and focuses on improving forest practices in relation to the criteria and indicators applied. Also, feedback about the criteria and indicators and their application in audits is collected.

Based on the above evaluations, the audit team then prepares the draft audit report for review by the Board Chair. The auditee is given a draft of the report to review and provide comments to the audit team. A final draft report is then prepared and given to the auditee. Based on the final draft report, the auditee may submit comments to the Board.

The Board utilizes a long-form report model comprising three main sections—an Executive Summary, which includes conclusions, Board commentary, and recommendations, if required; audit results; and auditee response. This long-form reporting model is designed to provide comprehensive information about the results of forest practices.

The Board's comments about the results of the audit are reported in the Executive Summary section. For example, the Board may wish to comment on the results of an audit in relation to other audits conducted or developing trends. In the recommendations section, the Board may make recommendations it considers appropriate. The Board may be asked to be notified of the steps that have been taken to implement a recommendation.

The audit results section addresses licensees' forest practices in relation to criteria applied, including overall assessments about the practices audited in relation to each of the criterion applied. Audit findings may include the impact of forest practices on forest resources, findings in relation to indicators, findings in relation to government's objectives and comments on licensee management systems. This section will also include a description of any non-compliance observations that are considered significant.

Once the auditor submits the draft report, the Board Chair 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. A summary of these comments may be included in the final audit report.

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