



**Forest
Practices
Board**

Monitoring Licensees' Compliance with Legislation

Special Investigation

FPB/SIR/37

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Table of Contents

Board Commentary..... 1

Executive Summary..... 3

Introduction..... 4

Background..... 6

Approach..... 7

Findings..... 8

Discussion..... 14

Conclusion..... 18

Recommendations..... 19

Appendix I..... 21

Appendix II..... 23

Appendix III..... 26

Board Commentary

Planning and practice requirements of the *Forest and Range Practices Act* (FRPA) and the *Wildfire Act* (WA) are the minimum legal requirement on public land in British Columbia. The government inspects licensees' forest and range activities for compliance with these requirements and may take enforcement action for non-compliance. This helps to hold licensees accountable and is an indication that the legislation is working.

In 2010, the Ministry of Forests, Lands, and Natural Resource Operations (MFLNRO)—the government ministry responsible for monitoring forest and range activities on public land—began inspecting activities other than forest and range as part of its new legislative responsibilities. In this report, the Board looked at the extent to which the government still inspects forest and range activities. It found the number of inspections of forest and range activities for the year ending March 31, 2012 were a third of the number carried out three years earlier.

The Board is concerned that, with the steep drop in inspections, licensees' activities may not be inspected enough, particularly harvesting and road activities that pose a high risk of harm to resource values. Government needs to demonstrate that it is carrying out enough inspections to adequately monitor forest and range licensees' compliance with legislation. Otherwise, the public's confidence in the effectiveness of government oversight will be diminished. FRPA was intended to keep environmental standards high with strong compliance and enforcement, yet the MFLNRO's service plan no longer says that inspection priorities are based on an assessment of risk to the environment. This change may signal a shift away from inspections of forest and range activities that pose a high risk of harm to resource values.

The Board acknowledges the pressure on government to allocate its resources efficiently and monitor compliance across a broad range of activities. However without consistent, credible monitoring and reporting, neither the government nor the public will know if forest and range practice requirements are being achieved. This could seriously weaken the province's reputation for high environmental standards and raise doubt about whether the legislation is working.

In addition to inspections, there are other aspects of government's monitoring and enforcement that the Board will examine in future reports.

Executive Summary

The Forest Practices Board examined government's monitoring of licensees' compliance with FRPA and the WA. Compliance monitoring includes inspecting forest and range licensees' activities for compliance with planning and practice requirements. Inspections hold licensees accountable and help to maintain high standards on the ground. If licensees' activities are not inspected, particularly harvesting and road activities that pose a high risk of harm to resource values, the public's confidence in the effectiveness of government's oversight of licensees' activities may be diminished.

In October 2010, the government reorganized and created the MFLNRO. The MFLNRO now has more activities to inspect than the former Ministry of Forests and Range did, but it carries out fewer inspections and has fewer natural resource officers. With a broader mandate and fewer officers, the question this investigation sought to answer is: To what extent does the MFLNRO still inspect forest and range activities?

The investigation found that, for the year ending March 31, 2012, the number of inspections of forest and range activities was a third of the number carried out three years earlier. While forest and range inspections made up 58 percent of all inspections, only 33 percent were of harvesting and road activities, and only 2 percent were of range activities.

The reason more inspections were not carried out was the need to inspect non-forestry activities and other pressures on officers' time. These pressures included other agencies requesting officers' assistance, public complaints, projects designed to assess risk posed by non-forestry activities and investigations of potential non-compliance. Range activities were subject to inspection but it was more common for range planning staff to work with ranchers to resolve non-compliance concerns.

Over the next year there may be less time devoted to inspecting forest and range activities. More public complaints of non-forestry activities are expected, and officers will be focusing more on non-forestry activities as risks are identified and officers' knowledge of these activities improves.

It is not known whether fewer inspections will be effective in ensuring licensees' compliance with FRPA and the WA. For the government to have confidence that inspections of forest and range activities are ensuring licensees' compliance, it needs to more accurately measure the rate of compliance. Greater accuracy could be achieved by taking into account what inspections are finding. This means taking into account all instances of non-compliance for an activity, whether or not there has been enforcement action. If non-compliance is found, and it results in compliance action, such as a warning ticket or compliance notice, this should be factored into the rate of compliance for that activity. The rates of compliance for specific activities, such as harvesting or roads, could be identified.

By taking into account compliance actions as well as enforcement actions, the government's measure of licensees' compliance would be more accurate. It would enable inspection priorities to be adjusted if the rate of compliance for an activity increased or decreased.

Currently, the MFLNRO's performance measure is the "percent of the regulated community's compliance with statutory requirements," which compares the number of inspections to enforcement actions. This likely overstates the rate of compliance because it excludes non-compliances that did not actually result in enforcement action. A more accurate measure of licensees' compliance would compare the number of inspections to compliance and enforcement actions. It would give the government, and the public, greater confidence that inspections of forest and range activities are effective in ensuring licensees' compliance with FRPA and the WA.

Therefore, the Board recommends that government:

- Determine the aggregate rates of forest and range licensees' compliance with FRPA and the WA by taking into account all instances of non-compliance for an activity, whether or not the result was enforcement action.
- Publish annually the aggregate rates of forest and range licensees' compliance with FRPA and the WA for specific activities, such as harvesting and roads, ensuring that the rates of compliance are identified separately from the rates of other regulated communities within MFLNRO's mandate.

Introduction

The Forest and Range Practices Act (FRPA) and the Wildfire Act (WA) are the core of the provincial government's forest and range stewardship framework, setting out rules that must be followed when forest or range activities are undertaken on public land. If an activity results in a breach of these rules, the government may take action.

Compliance monitoring involves inspecting forest and range licensees' activities for compliance with the planning and practice requirements of FRPA and the WA. Activities are inspected by the government and when non-compliance is found, it can result in compliance action, such as a warning ticket or compliance notice;¹ or, enforcement action, such as a penalty determination, a violation ticket or a prosecution by Crown Counsel.²

Inspections help to deter non compliance with FRPA and the WA. As the government reported in its 2010 publication, *The State of British Columbia's Forests*, inspections that focus on areas at

¹ Compliance actions are used when an official has reasonable grounds to believe a contravention has occurred, or may be about to occur, but in situations where enforcement actions are not warranted. Compliance actions include warning tickets and compliance notices.

² Enforcement actions are used when an official determines that legislation requirements have been contravened and a formal sanction is warranted. Enforcement actions include violation tickets, monetary penalties, remediation orders, licence suspension, licence cancellation, timber sale disqualification and orders to vacate. The minister's delegate may impose a monetary penalty following an administrative process in which an officer alleges that a person has contravened FRPA or the WA. A person may challenge the penalty by appealing to the Forest Appeals Commission. Natural resource officers may prosecute a person by issuing a violation ticket. A person may challenge the ticket's issuance in Provincial Court. Alternatively, Crown Counsel may prosecute a person by laying charges in Provincial Court.

greatest risk for non-compliance provide, “a high level of deterrence on those activities needing the most effective oversight.”ⁱ According to the MFLNRO’s Service Plan (2011), “sites or activities chosen for inspection are selected based on an assessment of risk to environmental, public safety, social and economic values.”ⁱⁱ

Inspections hold licensees accountable and help to maintain high standards on the ground. If licensees’ activities are not inspected, particularly harvesting and roads activities that pose a high risk of harm to resource values,³ the public’s confidence in the effectiveness of government’s oversight of licensees’ activities may be diminished.

Of course, compliance with FRPA and the WA does not depend entirely on inspections. Licensees routinely rely on professional advice, are motivated to maintain third party certification⁴ and seek to uphold reputations. But while these things help to ensure that licensees comply, they are not a guarantee. Some licensees may ignore professional advice, not be certified, or have no regard for reputation.

In October 2010, the government reorganized and created the MFLNRO. Now activities authorized under the *Forest Act* and *Range Act* are only a part of its mandate.⁵ But while the increased mandate means that the MFLNRO has more activities to inspect than the former Ministry of Forests and Range did, it carries out fewer on-the-ground inspections and has fewer natural resource officers.

In a 2012 press release, MFLNRO stated that 11 000 inspections are carried out annually and that it has 169 officers, of which 156 are dedicated to carrying out inspections and investigations.ⁱⁱⁱ In contrast, in 2009, MFR reported that 14 772 inspections were carried out annually and it had 292 officers inspecting forest and range licensees’ activities.^{iv} Since 2009, MFLNRO has not publicly reported how many inspections of forest and range activities it has carried out.⁶

With a broader mandate and fewer natural resource officers, the question this investigation sought to answer is: To what extent does the MFLNRO still inspect forest and range activities? The investigation provides a picture, for the year ending March 31, 2012, of MFLNRO’s inspections of licensees’ compliance with FRPA and the WA, and determines the extent to which forest activities that have a high risk of harm to resource values have been inspected.

³ The FRPA prescribes objectives for 11 resource values which are soils; visual quality; timber; forage and associated plant communities; water; fish; wildlife; biodiversity; recreation resources; resource features; and cultural heritage resources.

⁴ The following website describes forest certification programs in British Columbia
<http://www.naturallywood.com/sustainable-forests/certified-forests>

⁵ See the MFLNRO news release dated June 1, 2012 entitled: *Natural Resource Officer designation takes root in B.C.* The release states that, as of March 15, 2012, compliance and enforcement staff in the MFLNRO will now be known as natural resource officers, and will be able to enforce the following acts: *Creston Valley Wildlife Act, Dike Management Act, Forest Act, Forest and Range Practices Act, Heritage Conservation Act, Land Act, section 105, Land Act, section 59(4) Motor Vehicle (All Terrain) Act, Park Act, Private Managed Forest Land Act, Range Act, Water Act, Water Protection Act, Weed Control Act, Wildfire Act, and Wildlife Act.*

⁶ The government has prepared draft annual reports for the years 2010, 2011 and 2012 but they are not yet published.

Background

When FRPA came into force in 2004, the government described it as having three pillars: (i) objectives; (ii) plan and practice requirements; and (iii) compliance and enforcement, which are supported by professional reliance and effectiveness evaluations.^v Eight years later, it may be asked: How strong is the compliance and enforcement pillar? A measure of strength is the extent to which the government inspects forest and range licensees' activities for compliance with FRPA and the WA.

The Forest Practices Board has audited and investigated compliance and enforcement on several occasions. In May 2012, the Board concluded that risk ratings must be as accurate as possible so that inspections are directed to those areas with the highest risk.^{vi} In May 2008, the Board found that there was no policy for inspection coverage throughout BC and variation between districts was high.^{vii} In December 1999, the Board assessed the government's framework for enforcement of the *Forest Practices Code of British Columbia Act*.^{viii}

The MFLNRO's Compliance and Enforcement Branch states that it has responsibility for "providing assurance for the government along with the public through on-the-ground monitoring and assessments of compliance with requirements."^{ix} This includes inspecting forest and range licensees' activities for compliance with the planning and practice requirements of FRPA and the WA.

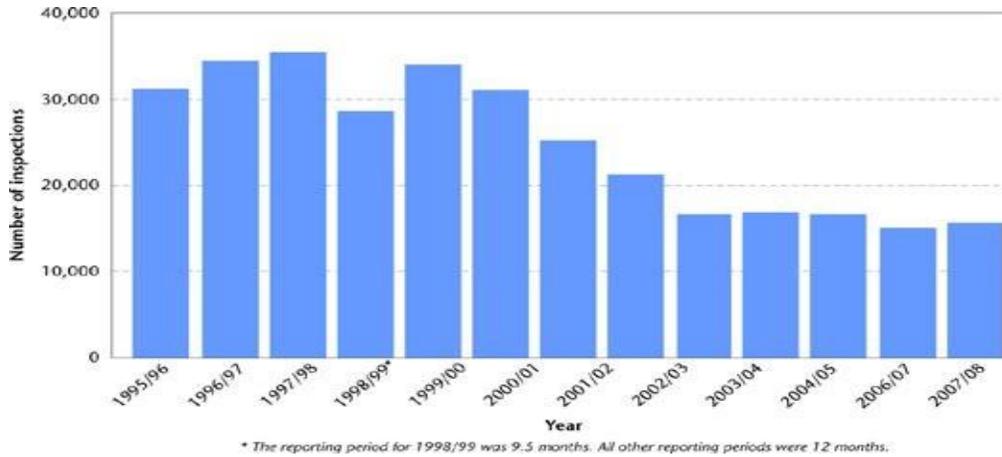
In 2007, compliance and enforcement officers in the northwest of the province began inspecting for compliance with other resource legislation, as part of the former Ministry of Forest and Range's Resource Management Coordination Project. This involved sharing of information and staff between several resource ministries to achieve greater efficiencies and effectiveness.⁷ In 2009, the project was expanded across the province. Depending on the area, up to 25 percent of officers' activities included compliance inspections for other resource ministries.^x As a result, when MFLNRO was created in 2010, officers already had some familiarity with the MFLNRO's broader mandate.

The MFLNRO's compliance and enforcement officers, now known as natural resource officers, inspect licensees' compliance with all legislation within the ministry's mandate. They work in eight administrative regions,⁸ led by regional compliance leaders who report to the director of the Compliance and Enforcement Branch.^{xi} Regional teams develop annual work plans that prioritize the inspection of activities and are informed by strategic direction from the branch.

⁷ As of October 2010, the natural resource sector agencies include: Ministry of Agriculture; Ministry of Energy and Mines; Ministry of Environment; and Ministry of Forests, Lands and Natural Resource Operations. Prior to October 2010 the natural resource sector agencies included: Ministry of Energy, Mines and Petroleum Resources; Ministry of Environment; Ministry of Forests and Range; Integrated Land Management Bureau; Ministry of Transportation and Infrastructure; and Ministry of Tourism, Culture and the Arts.

⁸ The eight administrative regions, as of May 2011, are known as: Caribou, Kootenay/Boundary, Northeast, Omineca, Thompson/Okanagan, Skeena, South Coast, and West Coast.

In 2010, the government reported, by way of the following chart, that the number of forest and range compliance inspections per year⁹ from 2002/03 to 2007/08 was 15,000 to 16,000—down from 33,000 in the late 1990s:^{xii}



The government also reported, by way of the Compliance and Enforcement Branch’s annual report, that in 2008/09 the number of forest and range inspections was 14,772. The branch has not published annual reports since then, or reported publicly on the number of forest and range inspections per year. The branch did report in 2012 that 11,000 inspections are carried out annually but these were for all activities, including forest and range.

Approach

The investigation looked at government’s inspection of licensees’ compliance with FRPA and the WA for the year ending March 31, 2012. Regional work plans were examined, inspections data was analyzed, and regional compliance leaders were interviewed, to determine the extent that the ministry inspected forest and range licensees’ activities, and the number of inspections focused on harvesting and roads, two forest activities most likely to put resource values at high risk of harm. The interview questions are in Appendix I.

The investigation relied on the number of inspections to measure the level of compliance monitoring. The numbers are approximate for several reasons. First, the data did not in all cases clearly differentiate between forest and range activities and other types of activities.¹⁰ Second, one or more records could have been created for a single site visit depending on how the officer

⁹ The government operates by fiscal year, which is April 1 to March 31. For example, the year 2002/03 is April 1, 2002, to March 31, 2003.

¹⁰ Inspections of forest activities were recorded in Compliance Information Management System (CIMS), MFLNRO’s inspection tracking system, under the headings of harvesting, roads, silviculture, recreation, revenue appraisals, and public complaints, or under the heading ‘general’. Inspections of range activities were recorded under the headings of range and public complaints, or under the heading ‘general’. Some regions relied on CIMS and their own incident ledgers to record inspections. Both systems used acronyms to identify the type of inspection when it was recorded in CIMS under the heading ‘general’ or in their own incident ledgers. Interviewees confirmed that the Board’s analyses of the data for their regions were generally accurate or provided more accurate figures.

chose to record it. Third, compliance monitoring involves other approaches, such as intelligence gathering, patrols and projects, which are not necessarily recorded as inspections. Nevertheless, the numbers of inspections are accepted as being generally indicative of compliance monitoring for the year ending March 31, 2012.

The investigation focused only on government's inspection of licensees' compliance, not on whether potential non-compliance was found or what was done when it was found.¹¹ Nor did it look at how risk was assessed or inspection priorities were set. To focus on these things would have greatly expanded the scope and length of the investigation, and the delay would have made the findings of the investigation less current.

Finally, the investigation did not look at whether inspections of harvesting and roads activities were sufficiently high to ensure licensees' compliance with FRPA and the WA. There are too many variables to make this determination. It may be that only a few inspections, or even no inspections, are sufficient depending on a licensee's past performance, the involvement of professionals, and the type of resource values at risk from an activity.

Findings

The findings of this investigation are organized into an introduction and five sections. The sections address the number of inspections of forest and range activities; inspection priorities; factors that influenced inspections of forest activities; why more inspections of forest activities were not carried out; and future challenges.

Introduction

The decline in forest and range inspections after 1999/00 coincides with the streamlining and eventual repeal of the prescriptive *Forest Practices Code of British Columbia Act* and enactment of the results-based FRPA in 2004 and the WA in 2005. It also coincides with a sizeable reduction in the number of natural resource officers¹² and a shift to inspections that focus on areas at greatest risk for non-compliance.^{xiii} These factors likely contributed to the decline in inspections after 1999/00, in that fewer planning and practice requirements needed fewer inspections, and, with fewer officers, areas of lower risk were inspected less often. However, it is notable that, since 2002/03, the number of inspections per year through 2008/09 was relatively constant at 15,000 to 16,000 despite fluctuations in the volume of timber harvested annually. This is likely because activities such as road maintenance and silviculture continue after harvesting and pose a risk of non-compliance. The following chart shows the volume harvested and the number of inspections per year:^{xiv}

¹¹ According to the MFLNRO's website, the Compliance and Enforcement Branch's key functions are to educate and maintain field presence, conduct inspections, conduct investigations, and take compliance and enforcement actions.

¹² A December 2010 Sierra Club BC report by Ben Parfitt entitled: *Axed: A Decade of Cuts to BC's Forest Service*, stated at page 4 that "Between 2001 and 2004, 800 people working for the Forest Service either left their positions and were not replaced, or were let go..." and, at page 1 that, "Between 2001/2002 and 2004/2005, field inspections by Forest Service Compliance and Enforcement staff fell by 46 percent..."

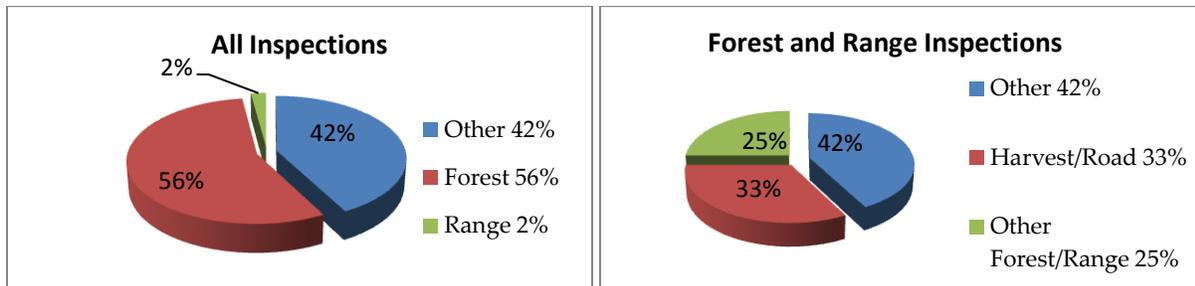
Fiscal year	Cubic metres (000s)	Forest and range inspections
2002/03	71,008	21,225
2003/04	58,433	16,540
2004/05	79,804	16,651
2005/06	80,298	16,566
2006/07	74,164	14,995
2007/08	73,998	15,688
2008/09	56,577	14,772
2009/10	47,104	?
2010/11	66,394	?
2011/12	70,003	4,993

Number of inspections of forest and range activities

For the year ending March 31, 2012, there were 8,641 inspections of all activities in the province, of which 4,808 inspections, or 56 percent, were of forest activities, and 185, or 2 percent, were of range activities. In total, 4,993 inspections, or 58 percent, were of forest and range activities.

Harvesting and roads activities pose a higher risk to resource values than other forest activities, such as silviculture, recreation and stumpage appraisals.¹³ The data shows that approximately 2,834 inspections, or 33 percent of all activities inspected, were of harvesting and roads. This number represents 59 percent of all forest activities inspected.

The following two charts show the percentage of forest and range inspections, and the percentage of harvesting and roads inspections carried out in 2011/12, as a percentage of all inspections:



¹³ Forest Practices Board audits since 1995 have consistently shown that harvesting and roads activities pose a high risk of harm to resource values. For example, see the Board report entitled *Road and Bridge Practices—Board Audit Findings 2005-2011*. The report shows that over 55% of issues found in audits since 2005 relate to roads and bridges.

The data shows the number of inspections, but not the time spent. Several interviewees pointed out that some inspections can be done more quickly than others. For this reason, the number of inspections does not necessarily reflect the time spent on them. However, most regions did not routinely record the time spent on inspections. Regions that did report time spent advised that less time was spent on forest and range inspections than the number of inspections suggest.

There were more inspections of *forest* activities in some regions than others. With one exception, every region's inspections of harvesting and roads activities made up at least half of its inspections of forest activities. Regional differences are summarized in Appendix II.

There were also more inspections of *range* activities in some regions than others. In 2011/12 there were 1,477 range tenures in the province.^{xv} Some interviewees advised that a few range inspections, such as those involving the removal of natural range barriers and unauthorized structures, may have been recorded as forest inspections, so that the number of range inspections was likely higher than reported. Also, in the two regions with almost no tenures, officers in adjacent regions attended to inspections.

Although the number of natural resource officers dropped from 292 in 2009 to 169 today, the average number of inspections per officer (of all activities) remained constant at about 50 per year. What has changed is the number of inspections of forest and range activities. In 2008/09 there were 14 774 inspections but, three years later in 2011/12, the number dropped to about 5,000, and only about 2,800 were of harvesting and roads. The remaining inspections were of other activities within the MFLNRO's mandate.

The reason for the change is clear: the MFLNRO has fewer natural resource officers and a broader mandate than the former Ministry of Forests and Range did. With many more activities to inspect, higher risk activities were given inspection priority. Forest and range activities, in particular harvesting and roads, were only a few of the activities assessed for risk and prioritized for inspection.

Inspection priorities

In 2009, regional compliance coordination teams undertook a detailed risk assessment of all activities as part of the resource management coordination project. The teams had representatives from several of the ministries responsible for lands, mines, environment and parks. Activities were assessed for risk and prioritized for inspection, and work plans were developed which guided inspections the following year. These work plans also guided inspections, with some adjustments, for the year ending March 31, 2012.

Adjustments to the work plans were necessary because, as interviewees pointed out, the teams in 2009 had different perspectives on the gravity and magnitude of risks. Also, the quality of information and team members' expertise varied. It fell to the MFLNRO's regional compliance leaders to ensure that their region's inspection priorities accurately reflected the known risks. To this end, several regions developed their own inspection plans that incorporated the teams' work plans.

The regional leaders prioritized between 38 and 55 diverse activities for inspection, ranging from open burning smoke control, mineral tenures, and water wells, to foreshore occupation, hazardous waste, and greenhouse boilers. The diversity of activities is illustrated in one region's list found in Appendix III.

Every region assigned at least some forest activities a high priority for inspection, but other activities—such as open burning smoke control and hazardous waste disposal—had even higher priority. However, the volume of forest activities meant there were more inspections of forest activities. A few interviewees suggested that the familiarity of officers with forest activities may have contributed to more inspections. Others suggested that, in some cases, activities assigned higher priority were occurring less in their regions.

No region assigned range activity a high priority for inspection although most regions had some range activity. A few regions had natural resource officers with considerable range expertise and some were professional agrologists. However, in most regions officers' expertise was more limited, although a few took an active interest in range matters. In these regions, expertise was found in range planning staff who worked with ranchers to prepare range use plans and to help ensure their successful implementation. As a result, officers relied on range planning staff to identify potential non-compliances and resolve them with ranchers on an informal basis; only when issues arose that could not be resolved were officers called upon to intervene. Officers also attended to public complaints involving range issues, which usually were cattle straying on to others' private property or on to roads causing public safety concerns.

Factors that influenced inspections of forest activities

Several factors influenced inspections of forest activities. Natural resource officers had freedom to decide when and where to inspect, major licensees were relied on to self-report, BC Timber Sales (BCTS) staff were relied on to provide information on timber sales licensees' activities, and there were, at times, competing priorities.

Most regions, at least once during the year, reviewed officers' progress inspecting high priority activities to ensure that as many inspections as possible were being done. Several interviewees emphasized that it was not the number of inspections but rather the effort being made to address priorities that mattered. In this regard, officers were expected to focus on high priority activities, but had considerable freedom to decide when and where inspections would occur, and to inspect lower priority activities when opportunities arose.

In regions with significant forest activity, interviewees advised that licensees authorized to harvest large volumes of timber, known as major licensees, routinely self-reported non-compliances. These licensees usually employ professional foresters, have environmental management systems, are certified by independent third parties, and have high compliance rates.¹⁴ For these reasons, inspecting their activities was a lower priority. However, some

¹⁴ High compliance rates have been reported in Compliance and Enforcement Branch annual reports and by the Forest Practices Board based on licensee compliance audits under FRPA.

interviewees said that inspections of major licensees' activities did occur, and would be increased if experience suggested that non-compliances were not being reported.

Some interviewees said that natural resource officers relied on BCTS¹⁵ staff to provide information concerning potential non-compliances by timber sale licensees. Staff is responsible for monitoring licensees' compliance with the terms of licences, so they are able to inform officers of potential non-compliances with legislation. To encourage staff to provide officers with this information, interviewees indicated that efforts have been made to build relationships with staff to ensure that reliable information is conveyed to officers. With respect to BCTS' compliance with legislation, specifically their obligations relating to road and bridge construction, and silviculture, interviewees confirmed that officers inspected these activities for compliance in addition to relying on staff to report potential non-compliances with legislation.

Sometimes inspections were affected by other circumstances. For example, in a few regions officers were in short supply due to vacancies, leave, or other assignments. Also, reliable information was not always available when needed, and concerns reported by other agencies, such as from BCTS, the Conservation Officer Service of the Ministry of Environment, and the Federal Department of Fisheries and Oceans often took priority. In addition, there were specific requests for help from other agencies, and public complaints to attend to.

Why more inspections of forest activities were not carried out

Despite the efforts made to prioritize inspections of forest activities, and the high volume of this activity in some regions, more inspections of forest activities were not carried out due to pressures on officers' time. In addition to having to inspect other non-forestry activities, these pressures were mainly from other agencies requesting officers' assistance, public complaints, projects designed to assess risk posed by non-forestry activities, and investigations of potential non-compliance.

There were numerous calls for assistance from others within the MFLNRO and from other agencies. For example, the Wildfire Management Branch called for officers with fire fighting skills and expertise in major fire cause investigations to assist in times of peak demand. Interviewees noted this required officers to work overtime which was usually taken as time off, further limiting the time available for inspections. In several regions, officers were involved in the "Bear Aware" initiative of the Conservation Officer Service of the Ministry of Environment. The Service had too few officers to deal with the scale of the problem—discouraging human behaviors that attract bears to urban areas—so natural resource officers were called upon to help.

Public complaints, most of which did not involve forest or range activities, were common. In a few regions, the volume of complaints was substantial. For example, in Thompson/Okanagan region over 50 percent of officers' time was spent responding to public complaints. Complaints

¹⁵ The 2012/13-2014/15 business plan for BCTS, at page 1, says that it, "has an integral role in supporting the Forest Sector Strategy in the BC Jobs Plan and supports the Ministry's objective to, generate revenue from BC's natural resources. BCTS provides these benefits by planning and developing, and selling through auction, a substantial and representative portion of the province's annual available timber volume."

were usually assigned a high priority, although efforts were made to address them while inspecting other high priority activities. A source of some complaints was the Ministry of Environment's *Report All Poachers and Polluters* (RAPP) program, which enables the public to anonymously report potential non-compliances.¹⁶

When the risks associated with an activity were not well understood, in part because few inspections had been done and compliance rates were unknown, officers were assigned to projects designed to determine whether or not the activity was a high risk and should have inspection priority. These projects focused on inspecting a particular activity for a limited time. For example, one project focused on inspecting docks on lakes to assess their foreshore status. Several regions had officers involved in projects designed to assess risk and levels of non-compliance.

When officers found potential non-compliance, it was investigated to determine an appropriate course of action. Interviewees acknowledged that it was not easy to predict the time needed to investigate, and some officers spent considerable time on investigations. They explained that time is needed to collect evidence, arrange for expert reports, and interview witnesses to pursue an administrative penalty, or report to Crown counsel. If a penalty is pursued, officers must present their findings to a statutory decision-maker. If the penalty is appealed, officers may be called as witnesses at the hearing. Also, if officers write violation tickets, they will be called upon to defend the ticket if a recipient decides to challenge it in Provincial Court.

Future challenges

Interviewees described the year ending March 31, 2012, as a year of transition. Officers were becoming more knowledgeable about new areas of activity and legislation, and there were more inspections of activities involving the public. While some regions preferred to focus on risk assessment projects and intelligence gathering, and emphasized officer patrols, others focused primarily on inspections of activities assigned a high priority based on risk assessments. Although the number of inspections was tracked by every region, most interviewees indicated a preference for tracking the time that officers spent, and indicated that time would be tracked more closely in the future.

In regions where forest activity is high, the inspection of harvesting and roads activities is expected to be no less this year than for the year ending March 31, 2012. However, some interviewees advised that over the next year less of officers' time will be devoted to monitoring forest and range activities. More public complaints of non-forestry activities are expected, and officers will be focusing more on non-forestry activities as risks are identified and officers' knowledge of these activities improves. However, some interviewees emphasized that priorities can easily change and forest activities may consume more inspection time than anticipated.

¹⁶ As stated on the Ministry of Environment's website: The *Report All Poachers and Polluters* (RAPP) program is a toll free tip-line and web-based service that allows you to report known or suspected violations of fisheries, wildlife, or environmental protection laws – anonymously and without risk of confronting the offender. Available 24/7, RAPP is simple, safe and effective.

Discussion

A number of observations were made concerning the investigation's findings. They relate to:

- meeting challenges
- effectiveness
- range inspections
- BC Timber Sales inspections
- C&E strategies
- public complaints
- forestry experience
- time for inspection and investigation

Meeting challenges

The MFLNRO's Compliance and Enforcement Branch monitors compliance with 15 statutes that authorize many diverse activities.^{xvi} For this reason, natural resource officers faced significant challenges, including becoming familiar with new activities, undertaking additional training, and learning legislation. It was apparent from interviews with regional compliance leaders that officers are meeting these challenges. The branch, in support of its officers, recently released a strategic plan.^{xvii} It confirms the branch's mandate, establishes priorities, and sets objectives to direct projects, operational functions and performance measures.¹⁷

Effectiveness

For the year ending March 31, 2012, the investigation found 58 percent of all inspections were of forest and range activities and 33 percent were of harvesting and roads activities. If time spent on inspections of forest and range activities decreases, harvesting and roads inspections will be conducted less often because inspections also include silviculture, recreation and stumpage appraisals. It is not known whether fewer inspections will be effective in ensuring licensees' compliance with legislation. Effectiveness depends on many factors, including who and what activity is inspected; when and where it is inspected; the frequency of inspections; and penalties for non-compliance. Although interviewees appeared comfortable with the level of inspections for the year ending March 31, 2012, some freely admitted that, if more officers were available, they would be welcome.

The number of forest and range inspections has dropped to a third in three years, from 14,772 to 4,993 inspections. The drop may be explained in part by greater efficiencies achieved through resource management coordination and the creation of the MFLNRO. While it may be that 14,772 inspections would be too many today, there is no way to know whether 4,993 are enough or—if inspections of forest and range activities fall—whether fewer inspections will be enough.

¹⁷ The six objectives are described as: 1) focused on solutions; 2) working in partnership; 3) integrated in approaches; 4) seen as the experts; 5) being safe in practice; and 6) transparent and consistent in communications.

For the government to have confidence that inspections of forest and range activities will ensure licensees' compliance with FRPA and the WA, it needs to accurately measure the rate of compliance.¹⁸ One measure used is the MFLNRO's performance measure for the year ending March 31, 2012. It was the, "percent of the regulated community's compliance with statutory requirements." The performance target was 92 percent and actual performance was 89.8 percent.^{xviii} However, this measure compared inspections to enforcement actions, not to compliance actions.¹⁹ In a 2010 report, the Board concluded that the comparison likely overstates the rate of compliance since it excludes potential non-compliances that did not actually result in enforcement action.^{xix} In other words, when the rate of compliance is based only on enforcement actions, the rate appears higher than it is.

Greater accuracy could be achieved by taking into account what inspections are finding. This means taking into account all instances of non-compliance for an activity, whether or not there has been enforcement action. If potential non-compliance is found, and it results in compliance action, such as a warning ticket or compliance notice, this should be factored into the rate of compliance for that activity. The rate of compliance could be identified for specific activities, such as harvesting or roads. Accuracy would increase, because more compliance actions than enforcement actions are taken against forest and range licensees. *The State of British Columbia's Forests, 2010*, reported that: "Compliance action rates (number of compliance actions as a percent of the number of inspections) averaged 14.2% and enforcement action rates averaged 2.7% during the last five years."^{xx} Compliance actions also provide timely information because an enforcement action can take up to three years from the date of inspection. By taking into account compliance actions as well as enforcement actions for specific activities, the government's measure of licensees' compliance would be more accurate. It would enable inspection priorities to be adjusted if the rate of compliance for an activity increased or decreased.

A more accurate measure of licensees' compliance would give the government confidence that inspections are effective in ensuring forest and range licensees' compliance with FRPA and the WA. It would also give the public more confidence in the effectiveness of government's oversight of licensees' activities. Reassuring the public may be particularly important now that the government's stated approach to risk assessment no longer refers directly to the environment. The MFLNRO's Service Plan (2011) said that "sites or activities chosen for inspection are selected based on an assessment of risk to environmental, public safety, social and economic values."^{xxi} However, the MFLNRO's Service Plan (2012) now says that "Inspection

¹⁸ In a 2011 report, the Office of the Auditor General of British Columbia concluded that: "Despite the significant role compliance and enforcement plays in the oversight framework, the ministry has not demonstrated whether its existing compliance and enforcement inspections are sufficiently robust to ensure industry compliance." See *An Audit of the Ministry of Forests, Lands and Natural Resource Operations' Management of Timber*, Report 11: February 2012, Office of the Auditor General of British Columbia, at p. 21.

¹⁹ The MFLNRO, in its *Revised 2011/12 – 2013/14 Service Plan*, May 2011, states, at page 17 that, "This indicator is measured as the number of inspections (completed without any non-compliance) that lead to a determined or prosecuted enforcement action against the total number of inspections completed."

priorities are based on an assessment of risk to public health and safety, as well as contributing to significant social and economic values.”^{xxii}

Range inspections

With respect to range licensees’ compliance with legislation, the inspections data show that range activities have had a low priority for inspection. This is surprising, given that range activities, particularly cattle grazing in riparian areas, are known to pose a high risk of harm to resource values. Several audits and investigations by the Forest Practices Board have identified this risk, most recently in the Oyama Creek community watershed.^{xxiii} The government has also identified this risk.^{xxiv} However, the risk of harm was addressed by means other than inspections. Although natural resource officers inspected range activities on at least 185 occasions, it was more common for range planning staff to work with ranchers to resolve concerns with potential non-compliance. This arrangement undoubtedly freed up officers’ time to focus on other inspection priorities and helped compensate for officers’ limited range expertise. But, with minimal oversight by officers, range licensees were not subject to compliance or enforcement action to the same degree that forest licensees were, despite being legally obliged to comply with the plan and practice requirements under FRPA.

BC Timber Sales inspections

The investigation found that natural resource officers in some regions relied on BCTS staff to provide information on potential non-compliances of timber sale licensees. While this practice may be expedient, officers should be seen to be acting independently from other program areas. If officers rely too much on BCTS staff for information, it could compromise their independence as law enforcement officers and undermine the integrity of FRPA’s enforcement regime. Also, by relying on BCTS staff for information, officers appear to be reacting to problems rather than assessing risk to decide whether or not licensees’ activities should be a priority for inspection.

Compliance and enforcement strategies

Officers now spend less time inspecting forest and range licensees’ activities, and more time monitoring the public’s activities. This is posing a number of challenges. As several interviewees pointed out, personal safety concerns have increased, new strategies for monitoring compliance are being adopted, and violation tickets are used more often. Tickets are used because, in many cases, the public is not subject to administrative penalties, and because warnings or compliance notices, which are commonly used when dealing with forest licensees, may be less effective when dealing with the public. Also, different enforcement strategies are being utilized, such as intelligence gathering, patrols and projects that focus on specific problem areas.

These strategies for the public are oriented toward enforcement action rather than compliance action. To deter the public from future contraventions, enforcement action may be appropriate

but, to deter forest and range licensees, compliance action may be more appropriate.²⁰ Strategies oriented toward compliance action may be more effective for forest and range licensees because they are part of regulated industries and familiar with government oversight. Officers must ensure that appropriate action is taken when licensees contravene FRPA and the WA.

Public complaints

The number of inspections appears to be increasingly limited by the need to respond to public complaints. When officers' time is spent reacting to complaints instead of proactively inspecting activities assigned a high priority, fewer inspections of forest and range activities occur. Also, risk assessment of forest and range activities becomes less relevant if activities assigned a high priority, such as harvesting and roads, are inspected less often because officers are reacting to complaints focused on other areas.

Forestry experience

With fewer natural resource officers inspecting many more activities, officers will have to develop a general knowledge of all activities. There will likely be less opportunity to specialize by focusing on only a few activities, such as forestry, because there are not enough officers in each region to allow much specialization. Officers' expertise in forest activities will eventually be diluted as less time is spent on forest activities and more time is spent on other activities.

Also, if less of officers' time will be devoted to monitoring forest and range activities, it is inevitable that some new officers will have no experience with forestry operations. Most officers are registered by the Association of British Columbia Forest Professionals as Registered Professional Foresters or Registered Forest Technologists.²¹ However, as of September 2012, new officers may be accredited by the Association as Natural Resource Professionals. The Association claims this new accreditation enables its holders to practice aspects of professional forestry while having an education in forestry conservation, management of renewable natural resources, and landscape and local-level planning for aquatic and terrestrial ecosystems.^{xv} The Branch will need to ensure that new officers are properly supported by others with specialized knowledge so that they will be able to carry out credible inspections of forest activities.

Time for inspection and investigation

The plan to record the time spent on inspections is encouraging because it acknowledges that some inspections are more time consuming than others. The complexity of plan and practice requirements demands that natural resource officers pay attention to detail, analyze information, and exercise sound judgment. It also demands a team effort and careful planning. Officers need time to determine that licensees are meeting these requirements and take

²⁰ The MFLNRO's website states that: "Historically, 80% of non-compliances are dealt with informally through compliance actions; 20% are dealt with through enforcement actions – the majority by administrative penalty processes or violation tickets."

²¹ Registered Forest Technologist is a designation of the Association of British Columbia Forest Professionals. In 2008, all C&E officers were required by the ministry to be designated by the Association.

appropriate action if they are not. Inspection of planning and practice requirements is important from a forest stewardship perspective because, if licensees do not comply with these requirements, the objectives set by government for resource values may not be achieved.²²

Officers inspect activities for instances of potential non-compliance. When potential non-compliance is found, they may investigate by gathering evidence to prove the non-compliance has occurred. Interviewees acknowledged that investigations of potential non-compliance take time away from inspections. Therefore, it is essential that inspection plans include realistic estimates of the time needed for investigations. This is particularly true of investigations of potential non-compliance of complex planning and practice requirements. For example, it is not a simple matter to determine whether a licensee has conducted its activities at a time and in a manner that was unlikely to harmfully alter fish habitat. These investigations require considerable time to collect evidence, consult with scientists, write reports, and pursue penalties. Unless requirements like this are investigated, licensees will not be held accountable for non-compliances. However, failure to investigate such requirements may indicate that the legislation is not working, either in its design or application.

Conclusion

For the year ending March 31, 2012, the number of inspections of forest and range activities was about 5,000, which is 58 percent of all inspections but only a third of the inspections done three years ago. The government recognizes the risk of harm to resource values from forest and range activities and prioritizes inspections to address the risk. However, only about 2,800, or 33 percent, of all inspections were of harvesting and roads, two forest activities that pose a high risk of harm to resource values. As for range activities, the government managed the risk of harm to resource values by relying on range planning officers to resolve issues informally with ranchers. Officers' attention was often diverted to other agencies requesting assistance, public complaints, projects designed to assess risk posed by other non-forestry activities, and investigations of potential non-compliance. If less of officers' time is devoted to inspecting forest and range activities over the next year, it is not known whether fewer inspections will be effective in ensuring licensees' compliance with legislation.

²² Objectives set by government for resource values in the *Forest Planning and Practices Regulation* include objectives for the following resource values: soils; timber; wildlife; water, fish, wildlife and biodiversity within riparian areas; fish habitat in fisheries sensitive watersheds; water in community watersheds; wildlife and biodiversity at landscape and stand levels; visual quality; and cultural heritage resources. The MFLNRO's Forest Resource Evaluation Program conducts studies to determine whether the government's objectives are being achieved. For a discussion and overview of the FRPA framework, see *Meeting the Requirements and Objectives of the Forest and Range Practices Act (FRPA)*, Forest Practices Board Information Bulletin, Volume 11, at: http://www.fpb.gov.bc.ca/INFO_BULLETIN_Vol_11_Meeting_the_Requirements_and_Objectives_of_FRPA.pdf

Recommendations

For the government to have confidence that inspections of forest and range activities are ensuring licensees' compliance, it needs to more accurately measure the rate of compliance. Greater accuracy could be achieved by taking into account what inspections are finding. This means taking into account all instances of non-compliance for an activity, whether or not there has been enforcement action. If non-compliance is found, and it results in compliance action, such as a warning ticket or compliance notice, this should be factored into the rate of compliance for that activity. The rates of compliance for specific activities, such as harvesting or roads, could be identified. By taking into account compliance actions as well as enforcement actions, the government's measure of licensees' compliance would be more accurate. It would enable inspection priorities to be adjusted if the rate of compliance for an activity increased or decreased.

Currently, the MFLNRO's performance measure is the "percent of the regulated community's compliance with statutory requirements," which compares the number of inspections to enforcement actions. This likely overstates the rate of compliance because it excludes non-compliances that did not actually result in enforcement action. A more accurate measure of licensees' compliance would compare the number of inspections to compliance and enforcement actions. It would give the government, and the public, greater confidence that inspections of forest and range activities are effective in ensuring licensees' compliance with FRPA and the WA.

Therefore, the Board recommends that the government:

- Determine the aggregate rates of forest and range licensees' compliance with FRPA and the WA by taking into account all instances of non-compliance for an activity, whether or not the result was enforcement action.
- Publish annually the aggregate rates of forest and range licensees' compliance with FRPA and the WA for specific activities, such as harvesting and roads, ensuring that the rates of compliance are identified separately from the rates of other regulated communities within MFLNRO's mandate.

Endnotes

- i BC Ministry of Forests, Mines and Lands. 2010. *The State of British Columbia's Forests, 3rd ed.* Forest Practices and Investment Branch, Victoria, BC, page 216.
- ii *Ministry of Forest, Lands and Natural Resource Operations Revised 2011/12 – 2013/14 Service Plan*, May 2011.
- iii MFLNRO news release dated June 1, 2012 entitled: *Natural Resource Officer designation takes root in BC*
- iv This figure was provided by Dan Graham, a former Director, Compliance & Enforcement Branch, Ministry of Forests and Range, who spoke to the Forest Practices Board in June 2010.
- v *What's New in FRPA (2005), FRPA Training Companion Guide*, Version 2.3, Province of British Columbia, May 2005, p. 2-1.
- vi *Meadow Creek Cedar Ltd., Forest Practices and Government Enforcement*, Forest Practices Board Complaint Investigation Report 110998, FPB/IRC/182, May 2012.
- vii *Compliance Inspections and Management*, Forest Practices Board Special Investigation Report, FPB/SIR/23, May 2008.
- viii *An Audit of the Government of British Columbia's Framework for Enforcement of the Forest Practices Code*, Forest Practices Board, FPB/ARE/01, December 1999.
- ix BC Ministry of Forests, Lands and Natural Resources Operations, 2012, *Strategic Plan, Compliance and Enforcement Branch*, page 3.
- x C&E Annual Report for April 1, 2008 to March 31, 2009, page 5.
- xi *Strategic Plan, Compliance and Enforcement Branch*, page 5.
- xii BC Ministry of Forests, Mines and Lands. 2010. *The State of British Columbia's Forests, 3rd ed.* Forest Practices and Investment Branch, Victoria, BC, page 213
- xiii *The State of British Columbia's Forests, 3rd ed.*, page 214
- xiv Source of information: to 2002/03 from Ministry of Forests and Range Annual Report table c2 (north coast included with Northern Interior); to 2006/07 from Ministry of Forests and Range Annual Report table 9.2; after 2006/07 based on Harvest Billing System reports.
- xv The data was e-mailed to the Forest Practices Board on April 12, 2012 by the MFLNRO in the form of a report entitled "2011 Active Grazing AUM Summary".
- xvi *Natural Resource Officers given expanded scope*, MFLNRO backgrounder to news release, June 1, 2012.
- xvii BC Ministry of Forests, Lands and Natural Resources Operations, 2012, *Strategic Plan, Compliance and Enforcement Branch*, page 6.
- xviii *Ministry of Forest, Lands and Natural Resource Operations 2011/12 Annual Service Plan Report*, June 2012.
- xix *Audit of Forest Legislation Enforcement in the Columbia Forest District*, Forest Practices Board, FPB/ARC/114, March 2010, page
- xx *The State of British Columbia's Forests, 3rd ed.*, page 216.
- xxi *Ministry of Forest, Lands and Natural Resource Operations Revised 2011/12 – 2013/14 Service Plan*, May 2011.
- xxii *Ministry of Forest, Lands and Natural Resource Operations 2012/13 – 2014/15 Service Plan*, February 2012.
- xxiii *Audit of Forest and Range Planning and Practices Affecting Water Quality in Oyama and Vernon Creek Community Watersheds, Okanagan-Shuswap District*, Forest Practices Board, FPB/ARC/140, August 2012.
- xxiv BC Ministry of Forests, Lands and Natural Resources Operations, Forest and Range Evaluation Program, *FREP Extension Note #22, Summary of Provincial Water Quality Effectiveness Evaluation Results (2008-2010)*, December, 2011; and *Assistant Deputy Minister Resource Stewardship Report: Results and Recommendations of the Forest and Range Evaluation Program*, July 2012.
- xxv Association of British Columbia Forest Professionals website: <http://www.abcfp.ca/>

Appendix I

Interview questions

Inspection Priorities and Business Planning

- The documents we have show that you risk rated ____ activities and prioritized inspections based on the risk ratings. _____ were for forest and range activities and _____ were assigned a high priority (> 5). Do you agree?
- To what extent was your region involved in risk rating and prioritizing inspections for forest and range activities?
- Were range activities risk rated and prioritized differently from forest activities when the region's inspection priorities were developed? If so, how?
- How were decisions made regarding who or where to inspect, and how often?
- To what extent were natural resource officers free to inspect forest and range activities not assigned a high priority?
- Did inspection priorities for forest and range change during the year? If so, what caused them to change?
- You set goals and objectives with desired outcomes for the inspection of forest and range activities. Did you determine whether or not inspections in 2011-12 achieved these outcomes? If so, what did you find?
- Did you prepare any reports summarizing whether inspections were consistent with priorities and whether they achieved the desired outcomes?

Inspections

- In your region, inspections of forest activities were ___% of all inspections. Was this result consistent with your expectations? Why or why not?
- Within forestry, harvesting and road activities typically pose the highest risk of harm to resource values. In your region, ___% of all inspections related to these activities. Was this result consistent with the priority given to inspecting these activities? Why or why not?
- Why were there not more inspections of forest harvesting and road activities?
- Would the percentage of inspections for forest harvesting and road activities likely have been higher but for unanticipated circumstances? If so, what were the circumstances?
- To what extent did inspections of forest harvesting and road activities result from others reporting compliance concerns (e.g. BCTS, government agencies, and the public)?
- Did you verify during the year that inspections were sufficiently focused on forest activities that were assigned a high priority? If so, what did you find?

- In your region, inspections of range activities were ___% of all inspections. The number of tenures is ___ and the risk rating assigned was ___. Was this result consistent with your expectations? Why or why not?
- Why were there not more inspections of range activities?
- For range activities, were other means used to monitor compliance with legislation? If so, what were they?

General

- What would you like to see come out of this review?
- What were your biggest challenges in carrying out compliance inspections in 2011-12?
- Did the compliance rate that resulted from the inspections of forest and range activities in 2011-12 inform the inspection priorities for 2012-13?
- Has your approach to compliance inspections changed this year? If so, how?

Appendix II

Percentage of Forest and Forest High Risk Compliance Inspections for 2011-12

Province

Inspection type	Total inspections	Percentage of All Inspections
All Inspections	8641	-
Forest Inspections	4808	56%
Forest High Risk Inspections	2834	33%

Caribou Region

Inspection type	Total Inspections	Percentage of All Inspections
All Inspections	970	-
Forest Inspections	738	76%
Forest High Risk Inspections	561	58%

Kootenay/Boundary Region

Inspection type	Total Inspections	Percentage of All Inspections
All Inspections	1343	-
Forest Inspections	784	58%
Forest High Risk Inspections	453	34%

Northeast Region

Inspection type	Total inspections	Percentage of All Inspections
All Inspections	282	-
Forest Inspections	66	23%
Forest High Risk Inspections	12	4%

Omineca Region

Inspection type	Total inspections	Percentage of All Inspections
All Inspections	1799	-
Forest Inspections	1187	66%
Forest High Risk Inspections	704	39%

Thompson/Okanagan Region

Inspection type	Total Inspections	Percentage of All Inspections
All Inspections	1020	-
Forest Inspections	410	40%
Forest High Risk Inspections	377	37%

Skeena Region

Inspection type	Total Inspections	Percentage of All Inspections
All Inspections	656	-
Forest Inspections	496	76%
Forest High Risk Inspections	341	52%

South Coast Region

Inspection type	Total Inspections	Percentage of All Inspections
All Inspections	1164	-
Forest Inspections	466	40%
Forest High Risk Inspections	210	18%

West Coast Region

Inspection type	Total inspections	Percentage of All Inspections
All Inspections	1407	-
Forest Inspections	661	47%
Forest High Risk Inspections	176	27%

Appendix III

A sample of one regions' list of activities for inspection

Function/Activity
Off road vehicles - environmental damage or wildlife harassment
Winter Feeding Inspections
Fish Passage
Rural landfills - expanded utility of NRO staff to inspect landfill site terms and conditions
Fire restriction patrols (cat 1, 2, 3)
Dam Inspections
Foreshore Development: private moorage, unauthorized foreshore structures - unauthorized structures
Open Burning Smoke Control Regulation
Management of Wildlife attractants - DWPO WLD Act
Dangerous wildlife Response Requests
Bear Aware
Wildfire Act inspections and investigations (hazard abatement, industrial obligations)
Access Management - Other/General - SMA's.
Section 58 Orders
Unauthorized occupation
Access Closures (related to wildfire)
Access Management - mountain \ caribou
Slaughter/Poultry, Ag Waste, Organic Matter
Fire Origin and cause investigations and follow up enforcement actions through Administrative process
SARA - industry/agriculture
Illegal dumping
Alleged Non Compliance - Investigations
Response to Confirmed Non Compliance - Enforcement
Unauthorized structures in BC Parks and Protected Areas
ORV use in Parks
Foreshore Development - environmental
HADD - fish habitat - major
Road Inspections; construction, maintenance (including safe fish passage at stream crossings) and deactivation
Harvest inspections including pricing & revenue, fire hazard
Range Use Inspections (specific to Boundary and Rocky Mountain)
Silviculture (Freegrowing declaration/Regen Delay) inspections
Landscape level FSP Inspections
Mineral Tenure Inspections and Reviews

Inspections- Revenue
Radar use for forest and range
water usage monitoring
Vehicle Dismantling CofD
Pesticide Use Permits field verifications
SARA - recreation
Abandoned/ unauthorized tenures and/or structures
Fire tool compliance inspections
Section 9 (Water Act) unauthorised crossings
Proactive Tenure Compliance Verification
Tenure renewal inspections (land related)
Site and Trail Inspection and enforcement of recreation regulations.
Recreation Sites & Trails Enforcement - Long Weekends & Periods of High Use
Commercial Use of Rec. Sites
Commercial Recreation Inspections
Section 8 (Water Act) inspections for authorization of short term use of water
Well Inspections



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