

## Introduction

The Forest Practices Board is British Columbia's independent forestry watchdog. On behalf of the public, it oversees forest and range practices on public land, assessing compliance with the *Forest and Range Practices Act* and the *Wildfire Act*. One of the main ways the Board gathers information is through its field-based audits. The Board typically conducts 8-10 forest and range compliance audits each year.

The purpose of this report is both to summarize the findings of the 23 audits published in 2013 and 2014 and to draw attention to the number of failures to follow *Wildfire Act* requirements. This trend is concerning to the Board, especially as we enter into a summer following historic low snow packs in many areas of the province<sup>1</sup>, and are seeing an early start to the wildfire season.

## Audit Process

Board audits are focussed on compliance with the legislation. Auditors objectively collect and evaluate evidence to determine if forestry and range activities comply with forest and range practices legislation and operational plans. They also ensure that licensees' forest practices are consistent with government objectives for forest resources. Board audits involve extensive fieldwork, and use standards that are consistent with those used in financial audits. Board audits do not assess the effectiveness of forest practices at achieving government's objectives or the intent of the legislation.

When choosing an audit, the Board randomly selects an area of the province, such as a forest district. Then the auditors review the forest resources, geographic features and operating conditions, among other factors, in the area selected. These are considered in conjunction with the Board's operational and strategic priorities (updated annually), and the auditee(s) is determined. At this stage, the Board chooses the auditee(s) that best suits the selected risk and priorities. The audit selections are not based on past performance. Potential auditees include holders of tree farm licences, forest licences, woodlot licences, community forests, and range permit holders. In addition, British Columbia Timber Sales (BCTS) and related timber sale licence holders, as well as holders of licences to cut, which can include ski resorts as well as hydro companies, may also be audited.

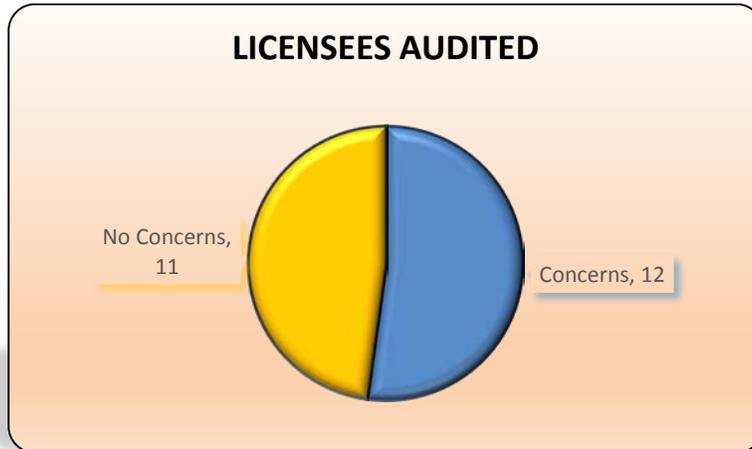
## Findings

The Board conducted 18 compliance audits of planning and practices in 2013 and 2014. This resulted in 23 audit reports; covering 29 forest licensees holding 42 separate forest licenses; 4 range licensees holding 3 tenures for grazing and 1 tenure for hay cutting; as well as 4 BCTS operating areas, including 59 timber sale licence holders.

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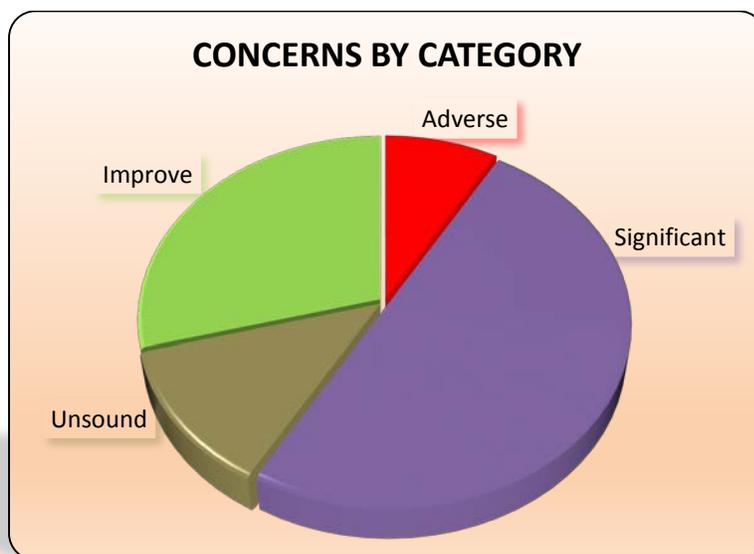
<sup>1</sup> Based on the May 1, 2015, Snow Survey and Water Supply Bulletin, of the 22 snow basins across BC, only 4 have greater than 100 percent of normal snow pack whereas 7 indicate a record low, with Vancouver Island and the South Coast both being less than 15 percent of normal. Here is the link: <http://bcrcf.env.gov.bc.ca/bulletins/watersupply/current.htm>

Of the 23 audit reports, 11 had no concerns noted, and 12 had a total of 24 concerns reported.



Of the 12 audit reports with concerns:

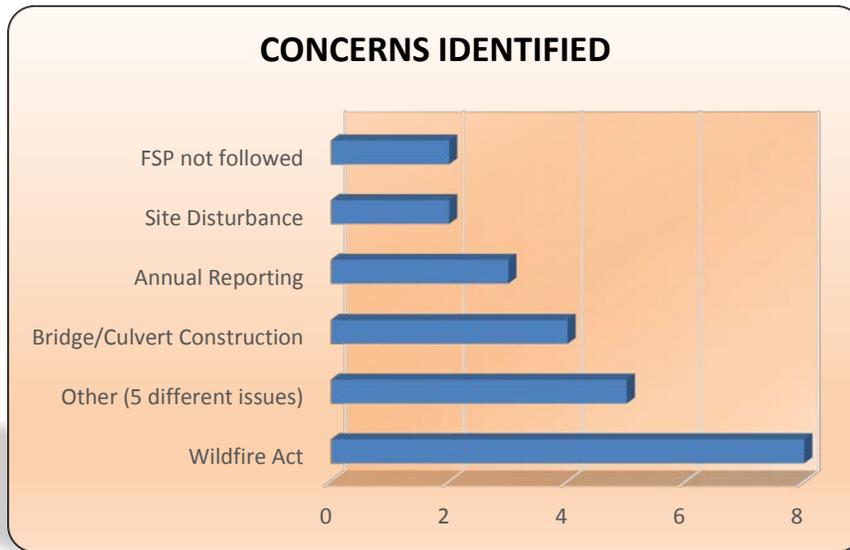
- 5 found compliance<sup>2</sup> with the legislation, but:
  - 1 audit had both an unsound practice and an area requiring improvement; and
  - 4 audits had one area requiring improvement.
- 7 found non-compliance with the legislation;
  - 2 had one significant non-compliance finding each;
  - 2 had two significant non-compliance findings each;
  - 1 had 3 significant non-compliance findings, as well as 1 unsound practice and 1 area requiring improvement;
  - 1 had an adverse opinion, as well as 2 significant non-compliance findings; and
  - 1 had an adverse opinion, 1 significant non-compliance finding, 1 unsound practice and 1 area requiring improvement.



<sup>2</sup> Refer to Appendix 1 for the classification of findings.

## Trends

Although the findings cover several different aspects of forest management, including bridge construction (a continuing concern), poor visual quality management, a lack of reporting and a failure to follow the forest stewardship plan, the majority of the findings, a full one third of the concerns reported, relate to the *Wildfire Act*.



Of the eight findings related to the *Wildfire Act*, two were adverse opinions, where both licensees failed to comply with the assessment and abatement requirements of legislation; one was a significant finding where the licensee was actively timber harvesting without an adequate fire suppression system, (water tank was almost empty), when activities were restricted due to hot and dry conditions; and five were areas requiring improvement.

Of these five areas requiring improvement, one related to a small escape of a slash burn. This was not considered significant since the licensee was monitoring the site, identified the escape, and acted promptly in extinguishing the ground fire. Three related to licensees not conducting hazard assessments as required by legislation, but these were not considered significant as all three licensees had abated the hazard. The other concern related to four separate licensees not having an adequate fire suppression system on site, as required by legislation. Since the field work inspections took place just as the weather began to change from cool moist spring conditions with snow at higher elevations to summer conditions, this was only considered an area requiring improvement. Had it been later in the season with warmer conditions, this would have been a significant non-compliance finding.

On the positive side, we also found positive examples of fire protection activities in two of the audits.

In the BC Hydro audit, the Board assessed all fire protection activities on four licences related to the construction of the Columbia Valley Transmission Project. Auditors reviewed emergency response plans, burn plans and contract completion certificates as well assessing hazard assessment and abatement practices for the entire 125 kilometres of the transmission line project and found that all of the activities assessed met the requirements of the *Wildfire Act*.

In the Ka-Bar Resources Limited audit, the Board noted that five of Ka-Bar's forestry licences to cut were issued to enable harvesting of trees to protect communities from wildfire. In addition to being compliant with the *Wildfire Act* during the harvesting activities, the harvesting conducted by Ka-Bar has reduced the wildfire risk to the community by reducing the frontal intensity of a potential fire, as well as reducing the potential for crown fires and associated long-range spotting (embers carried by wind that start new fires well beyond the main fire). In this report, the Board acknowledged the work done by Ka-Bar in helping reduce the risk to the community of Bankeir.

## Conclusion

The Board published 23 separate audit reports based on the work conducted over the 2013 and 2014 field audit seasons. These reports covered both large and small and certified and non-certified operations, including forest licences, tree farm licences, BC Timber Sales, woodlot licences, licences to cut, range tenures, and a community forest licence. Overall, the results are mixed, with just over half of the audits finding concerns with the forest practices assessed.

Of particular concern to the Board is that one third of the findings relate to the *Wildfire Act*. The Board encourages all licensees, big and small, to pay particular attention to fire protection activities this coming season. This includes ensuring there is at least one available fire tool for each person working on site; that a functional water delivery system, with a full supply of water is on site; and that hazard assessments are not only completed, that any hazards are abated as soon as the conditions are safe to do so.

The 2015 field audit season is just beginning and the Board encourages all licensees to ensure their operations are in compliance with the *Forest and Range Practices Act* and the *Wildfire Act*. We hope to find a significant decrease in the number of concerns showing up in our audits in the future.

## Appendix 1: Classification of Findings

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Auditors categorize their findings into the following levels of compliance:

**Compliance** – where the auditor finds that practices meet the *Forest and Range Practices Act* or *Wildfire Act* 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 generally worthy of reporting.

**Area requiring improvement** – where the auditor, upon reaching a not significant non-compliance conclusion, determines the event(s) is still of sufficient magnitude to be reported as an area requiring improvement.

**Unsound practice** – where the auditor determines that an event(s) or condition(s) is a significant identified practice that, although they are found to be in compliance with *Forest and Range Practices Act* or *Wildfire Act*, are not considered to be sound management.

**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 more non-compliance events.

**Adverse opinion** – is in an overall negative conclusion, which is appropriate when significant non-compliance is individually or collectively of sufficient magnitude to warrant an overall negative opinion. A significant breach would also warrant an overall negative opinion.

## Appendix 2: Audits Started in 2013 and 2014

DATE PUBLISHED	TITLE	NUMBER AND TYPE OF LICENCE
Nov. 2013	BC Hydro and Power Authority (ARC156) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-fire-protection-practices-bc-hydro-power-authority-oltcs-l48655/">https://www.bcfpb.ca/reports-publications/reports/audit-fire-protection-practices-bc-hydro-power-authority-oltcs-l48655/</a>	4 Occupant Licences to Cut
Nov. 2013	Ka-Bar Resources Limited (ARC157) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-ka-bar-resources-ltd-fltcs-a83972/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-ka-bar-resources-ltd-fltcs-a83972/</a>	10 Forestry Licences to Cut
Dec. 2013	South Island District Woodlots (ARC158) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-south-island-district-woodlots/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-south-island-district-woodlots/</a>	8 Woodlot Licences
Dec. 2013	Ndazkhot'en Forest Management Ltd. (ARC159) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-ndazkhoten-forest-management-ltd/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-ndazkhoten-forest-management-ltd/</a>	2 Forest Licences
Dec. 2013	Western Forest Products Inc. (ARC160) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-western-forest-products-inc-tfl-39/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-western-forest-products-inc-tfl-39/</a>	1 Tree Farm Licence
Feb. 2014	Skeena Business Area - Coast Mountain Resource District (ARC161) <a href="https://www.bcfpb.ca/reports-publications/reports/forestry-audit-bcts-and-timber-sale-licence-holders-skeena-business/">https://www.bcfpb.ca/reports-publications/reports/forestry-audit-bcts-and-timber-sale-licence-holders-skeena-business/</a>	BCTS – including 13 Timber Sale Licence Holders
Feb. 2014	South Island District Woodlots (ARC162) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-south-island-district-woodlot-licence-w1632/">https://www.bcfpb.ca/reports-publications/reports/audit-south-island-district-woodlot-licence-w1632/</a>	1 Woodlot Licence
Mar. 2014	South Island District Woodlots (ARC163) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-south-island-district-woodlot/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-south-island-district-woodlot/</a>	1 Woodlot Licence
Mar. 2014	Prince George Business Area (ARC164) <a href="https://www.bcfpb.ca/reports-publications/reports/forestry-audit-bcts-and-timber-sale-licence-holders-prince-george/">https://www.bcfpb.ca/reports-publications/reports/forestry-audit-bcts-and-timber-sale-licence-holders-prince-george/</a>	BCTS – including 17 Timber Sale Licence Holders
Jun. 2014	Mackenzie Fibre Management Corporation (ARC165) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-mackenzie-fibre-management/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-mackenzie-fibre-management/</a>	1 Forestry Licence to Cut
Sept. 2014	Carrier Lumber Ltd. ((ARC166) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-practices-carrier-lumber-ltd-fl-a18158/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-practices-carrier-lumber-ltd-fl-a18158/</a>	1 Forest Licence
Nov. 2014	RMR Acquisitions Inc. (ARC167) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-rmr-acquisitions-inc-oltc-l49318/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-rmr-acquisitions-inc-oltc-l49318/</a>	1 Occupant Licence to Cut
Nov. 2014	Terrace Community Forest Limited Partnership (ARC168) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-terrace-community-forest-ltd/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-terrace-community-forest-ltd/</a>	1 Community Forest Licence
Dec. 2014	Burns Lake Specialty Wood Ltd. (ARC169) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-burns-lake-specialty-wood-ltd-nrfl/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-burns-lake-specialty-wood-ltd-nrfl/</a>	1 Non-Replaceable Forest Licence
Dec. 2014	Pebble Creek Timber Ltd. (ARC170) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-pebble-creek-timber-ltd-fl-a19218/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-pebble-creek-timber-ltd-fl-a19218/</a>	1 Forest Licence
Dec. 2014	Keneknem Forest Tenures Ltd. (ARC171) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-keneknem-forest-tenures-ltd-firfl/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-keneknem-forest-tenures-ltd-firfl/</a>	1 First Nations Woodland Licence
Dec. 2014	Lil'wat Forestry Ventures and Lil'wat Construction Enterprises (ARC172) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-lilwat-forestry-ventures-fl-a83925/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-lilwat-forestry-ventures-fl-a83925/</a>	1 Forest Licence and 1 Non-Replaceable Forest Licence
Jan. 2015	639881 BC Ltd. (ARC173) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-639881-bc-ltd-nrfl-a72921/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-639881-bc-ltd-nrfl-a72921/</a>	1 Non-Replaceable Forest Licence

Feb. 2015	TimberWest Forest Corporation (ARC174) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-timberwest-forest-corporation-tf/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-timberwest-forest-corporation-tf/</a>	1 Tree Farm Licence
Feb. 2015	Thompson Rivers District Woodlots (ARC175) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-woodlot-licences-w0303-w1434-w1591/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-woodlot-licences-w0303-w1434-w1591/</a>	4 Woodlot Licences
Mar. 2015	Babine Business Area (ARC176) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-bcts-and-timber-sale-licence/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-bcts-and-timber-sale-licence/</a>	BCTS – including 11 Timber Sale Licence Holders
Mar. 2015	100 Mile House Range Tenures (ARC177) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-range-planning-and-practices-range-agreements-ran073562-ran074611/">https://www.bcfpb.ca/reports-publications/reports/audit-range-planning-and-practices-range-agreements-ran073562-ran074611/</a>	3 Grazing Tenures and 1 Hay Cutting Tenure
Apr. 2015	Chinook Business Area (ARC178) <a href="https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-bcts-and-timber-sale-licence-0/">https://www.bcfpb.ca/reports-publications/reports/audit-forest-planning-and-practices-bcts-and-timber-sale-licence-0/</a>	BCTS – including 18 Timber Sale Licence Holders