

What to Expect During A Board Compliance Audit

A guide for holders of woodlot licences, community forest agreements, forestry licences to cut, non-replaceable forest licences, First Nations woodland licences, as well as timber sale licence holders



Forest
Practices
Board

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Introduction

The Forest Practices Board (Board) is British Columbia's independent forest and range watchdog. On behalf of the public, it monitors and reports on forest and range practices on public land. One of the main ways it does this is through field-based compliance audits of forest and range licensees.

The purpose of this guide is to help licensees prepare for a Board audit and discuss how to conduct their practices to avoid issues most commonly found in past audits. This guide answers some frequently asked questions and provides potential auditees with background information on the audit process.

Frequently Asked Questions

What is a compliance audit?

A systematic and independent examination of data.

A compliance audit is a systematic process of objectively obtaining and evaluating evidence with respect to meeting the requirements of the *Forest and Range Practices Act* (FRPA) and the *Wildfire Act* (WA) and then communicating the results. A Board compliance audit examines forest and/or range planning and activities to determine if they are consistent with forest and range practices legislation and operational plans. Auditors also assess if the operational plans are consistent with government objectives for forest and range resources. These audits involve extensive fieldwork, and use standards that are consistent with those used in financial audits.

Why does the Board conduct compliance audits?

To provide public assurance and improve practices.

The Board was created to help assure the public that forest and range activities on Crown Land in British Columbia follow legislation and warrant public confidence. If the Board identifies areas of concern, its hope is that this will not only result in the auditee addressing the noted deficiencies and improving their overall management and administration, but serve as a reminder to other licensees to do the same.

Roads and bridges are an important component of Board audit work.



Where does the Board get its authority?

Legislation.

FRPA and the WA require the Board to carry out independent audits of licensees operating on Crown land.

Who is eligible to be picked for an audit?

Government, *Forest Act* and *Range Act* tenure holders.

If a party holds a *Forest Act* tenure, that party is eligible to be selected for an audit. These tenures include: tree farm licences, forest licences (both replaceable and non-replaceable), woodlot licences, community forest agreements, First Nations woodland licences, timber sale licences, range tenures as well as holders of licences to cut authorized under the *Forest Act*, including controlled recreation areas (ski hills), hydro companies and independent power producers. Government, specifically BC Timber Sales, can also be picked for an audit.

How does the Board select licences to audit?

Qualified random selection.

First, the Board randomly selects 2 to 3 districts or timber supply areas (TSAs) from each of the 3 natural resource areas in BC (North, South and Coast). The auditors then review the forest resources, geographic features, activities and operating conditions in the district or TSA selected as well as past audits in that district or TSA. These factors are considered in conjunction with the Board's operational and strategic priorities and the type of audit is determined. At this stage, the Board chooses the auditee(s) that best suit the selected risk and priorities.

The audit selections are not based on past performance.

How many compliance audits does the Board do each year?

Between 8 and 12.

The Board generally does 2 or 3 audits in each of the 3 natural resource areas and 2 BCTS business unit audits (including TSL holders) annually. Sometimes it may be more or less depending on what other projects the Board is involved with that year.

What are the chances my licence will be selected to be audited?

Not very high.

There are thousands of forest and range licences in BC and the Board only audits between 30 and 60 licences in a year, so the chance of being audited in any given year is low.

As a woodlot licence holder, what are the chances my licence will be selected for audit?

Less than 1 percent.

There are over 860 active woodlots in BC. The Board will audit between 5 and 10 woodlots every year or 2, so the overall chance of a woodlot being audited is small. However, if the Board happens to pick a district with an active woodlot program and a licensee's woodlot has been quite active harvesting in the past 1 or 2 years, the Board may select that licensee for an audit.

For example, in 2013, the Board randomly selected the South Island District as a location for an audit. After assessing the activities within that area, the Board chose to conduct a full scope compliance audit of 10 of the woodlot licences within southern Vancouver Island, all of which cut more than 5000 cubic metres of timber in the previous 2 years.

As a community forest agreement holder, what are the chances our licence will be selected for audit?

About 2 percent.

There are about 50 community forests in BC and the Board usually audits 1 or 2 every couple of years—so the chance of being audited is still pretty low.

Can a licensee be audited more than once in a single year?

Yes and no.

The Board will not audit a licensee's activities in two separate districts in any one year, (unless the selected licence overlaps more than one district), but may audit multiple licences held by that licensee in the same district, during a single audit.

For example, in 2013, 1 licensee held 10 forestry licences to cut in 1 area and the Board audited all 10 licences as one compliance audit.

How often can a licence be audited?

Every five years.

Once a licence is audited, the current policy is that the Board waits for five years before that licence becomes eligible for audit again.

Once notified, can a licensee say no to the audit?

No.

The Board is required by legislation to conduct periodic independent audits of government and holders of an agreement under FRPA and in order to maintain the integrity of the program, Board policy is that once a licence has been notified of the audit, the Board will carry out the audit, without exception.

Do licensees have to cooperate?

Yes.

FRPA requires licensees to comply with information requests from the Board, however, it is our preference to work cooperatively with all licensees.

Once notified, can a licensee change the timing?

On rare occasions.

Board audits are scheduled throughout the summer months to allow staff and contractors to efficiently use their time to allow the Board to conduct its suite of audits. By the time the Board notifies the licensee, the audit team is all set up for this timeframe. That being said, when the Board does get asked to change the timing, each case is considered on an individual basis. For example:

- If a licensee asks for the timing to be changed because they are busy working, the Board would say no to the change, let the auditee know that the auditors will be as efficient as possible, and that the Board likes to audit active operations.
- If a licensee asks for the timing to be changed because they already have a certification audit scheduled for that same week, the Board will let the licensee know that they will not have to endure two audits at the same time. Auditors would then discuss the timing with the licensee and the certifier and the audit may go ahead at that time, or may be deferred. In either case, where practicable and agreed to by the auditee, auditors offer to provide our findings to the certifier to allow them to spend less time on the ground in their audit or ask the certifier to share their findings with Board auditors to ensure our efficiency as well—depending on who conducts their audit first.

Can a certification audit replace a Board audit?

No.

Certification audits and Board audits are quite different. Where Board audits focus on compliance with legislation and conduct many site visits on each licence audited, certification audits assess to a standard, with compliance only being one component, and they tend to focus more on systems and processes and generally do not conduct as many site visits. As well, one certification audit can include many different licences spread across BC, sometimes even in different provinces.

What types of Board compliance audits are there?

Full and limited scope.

A limited scope audit examines only some of the activities, such as roads and harvesting, but a full scope audit examines everything including operational planning; road and bridge construction, maintenance and deactivation; timber harvesting; silviculture; as well as fire protection.

Who does these audits?

Professionals.

The Board must appoint auditors to carry out these audits. These auditors are staff and contractors, all of whom have years of forestry and/or audit experience and most are professionals, such as RPFs, RPBios, PEngs, P.Geos, P.Ags, CAs or other professional designations.

Does the licensee have to pay for this audit?

No.

The cost of the audit, including Board staff and contract auditors time, accommodation and transportation is borne by the Forest Practices Board. That being said, auditees are expected to provide the required background information, and if possible, accompany the auditors in the field. These associated costs are borne by the auditee.

How long will the field portion of the audit take?

About one week.

An audit of a BCTS program or a large licensee usually takes between four to five field days. A mid-sized licence, like a NRFL may take three field days and a woodlot usually takes one field day. However, the field time required to conduct the audit may increase if potential issues are noted and additional audit work is required, or if a specialist is required to assess a specific concern.

Will the auditee have a chance to discuss the findings during the audit?

Yes.

Auditors encourage auditee involvement throughout the audit process. If asked, auditors will give their opinion about a potential issue, but a final call regarding significance can't be provided until after the analysis stage of the audit is completed.

How long until the final report is released?

Generally three to nine months.

While the Board strives to have all of the audits published prior to the start of the next field season, the timing of the report can vary dramatically based on the potential issues to be analyzed and scheduling of exit meetings and possible representations. The simpler the audit, straightforward with no findings, the quicker it will be published.

Will I get a chance to see the report before it is released?

Yes, possibly multiple times.

All auditees will have an opportunity to review a draft report. If there are potential findings, the auditee will also have a second opportunity to review the report through the representations process prior to publishing.

Will the audit report be made public?

Yes.

Every audit report prepared by the Board is first provided to the auditee at least seven days before it is released to the public and the Minister of Forests, Land and Natural Resource Operations. All Board reports are made available on our website once published: <http://www.bcfpb.ca>

Are all non-compliances noted during an audit reported?

No.

There may be minor instances of non-compliance that are detected but not included in the audit report.

How do the auditors determine if a non-compliance is reportable?

Professional judgment.

The audit field team, including the Director of Audits, assesses all evidence noted during the field work and analysis phases of the audit. The teams as a whole discuss the potential issues and sometimes ask for opinions from other professionals or staff members, then the Director of Audits signs off the Audit Opinion Statement. In many cases, identifying a non-compliance is not that difficult, but determining if that non-compliance is individually or pervasively significant, and therefore reportable, can be much more challenging.

Will I have to pay a fine if found to be in non-compliance?

No.

The Board cannot levy penalties, however, as stated above, audit reports are made public and distributed to the relevant government ministers and professional associations, who may choose to initiate further action depending on the audit findings. It is possible that the Board and the Ministry of Forest, Lands and Natural Resource Operations' Compliance and Enforcement branch may be looking at the same issue, but only the Ministry can levy penalties or issue stop work orders.

Where does a licensee find more information about the Board's audit process?

Our website.

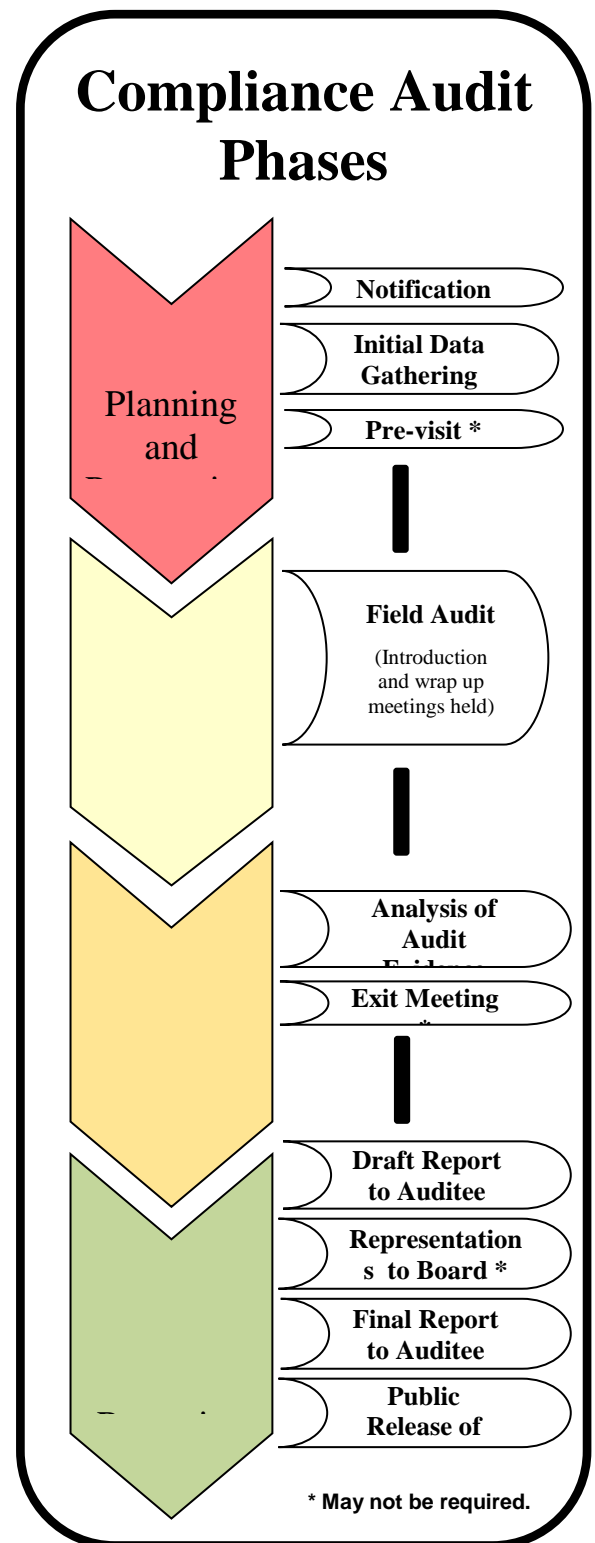
The Board's compliance audit reference manual is available on our website: <http://www.bcfpb.ca>

What are the Steps in a Forest Practices Board Audit?

First Contact Your first contact with the Board will be a call from the Director of Audits letting you know that your licence (or licences) was selected for audit. He will let you know what activities will be examined, the time period (usually the past year or past two years) and when the audit field work is planned. The Board's policy is to provide at least four weeks notice of an audit.

Notification Letter Soon after the Director's call, he will send you a notification letter, which will describe the audit scope (activities to be examined and the audit period), discuss timing of the field work, identify the team leader, and request that you provide us with a designated contact person for the audit.

After you receive the letter, the team leader will contact your audit contact (this may be you or another person) to discuss the audit process and to request the information required to conduct the audit.



Planning for the Audit

Auditors need to determine what activities took place during the audit period, usually the previous one or two years. The team leader will ask you for details about harvesting, roads and bridges, silviculture and protection activities, as well as relevant planning documents such as the forest stewardship plan, woodlot licence plan and site plans. Auditors will compare the information you provide with government systems to confirm what activities occurred.

Audit team members will select a sample of each type of activity that they will examine on the ground, with an emphasis on high-risk features. For example, they may choose to examine half of the harvest sites on steep slopes and only 10 percent of the roads built on flat terrain with no stream crossings. Depending on the level of activity on the licence, auditors may plan to examine everything (100 percent sample). Auditors may also review third-party certification information to assist with risk assessments and selecting samples.

The Audit Team

The size of the audit team varies based on the level of activity. Members may be foresters, engineers, chartered accountants, or other professionals, and all have expertise in forest planning and practices. Some audits deal with issues that require the advice of specialists with expertise in subjects such as biology, archaeology, soils, terrain stability, recreation or entomology.

Fieldwork



Fieldwork can range from part of a day for a small woodlot licence up to a week for larger licences. Auditors will look at activities on the ground and sometimes from the air. Wherever possible, auditors prefer that a licensee representative accompanies them, although this is not required. That way everyone can discuss and agree upon what they see in the field. Auditors examine cutblocks, streams, roads, culverts, bridges and reserves, among other things. They may decide to look at more sites or less depending on what they see. They determine if practices are consistent with the operational plan, FRPA and the WA (see Appendix A for a link to these legal requirements). They also assess whether the practices are consistent with government's objectives for various forest resources, for example; biodiversity, soil conservation or water quality.

Once auditors complete the fieldwork, they meet with the licensee to discuss initial findings and obtain any additional information.

Analysis The audit team analyzes and interprets the information to determine whether the audited forest practices are in compliance with legal requirements and are achieving the desired outcomes. If required, the auditors will either meet with or call the auditee and discuss the potential findings. This is called an exit meeting. Auditors may seek more information from you during this stage.

Reporting Once the auditors have assessed the information gathered during the field audit, conducted their analysis and completed an exit meeting (if required) they will prepare a draft report. You will get a chance to review the draft report and provide comments.

Once the draft report is ready and has been formally signed off by the Director of Audits, the Board Chair must decide if anyone might be adversely affected by the report. If so, he will provide that party with an opportunity to provide comments. This process is called making representations.

The Board, represented by the Chair, or a panel of some or all Board members, considers the draft report and any representations before making a final report. The Board report may include a commentary and recommendations. The final report is released to the auditee first, and then to the public and government via the Board's website. The Board may follow up on recommendations by asking licensees to notify the Board of steps taken in response. If the response is inadequate, the Board can advise government or Cabinet to consider further action.

The Board's “Top 10 Audit Findings” and what you can do to avoid them!

In February 2013 the Board reported a trend showing the number of reportable findings increased dramatically since 2010, and unfortunately, that trend appears to be continuing. Between 2010 and 2013, the Board has audited 16 woodlot licences, 6 community forest agreements, 7 non-replaceable forest licences, 17 licences to cut and numerous timber sale licences. Although not all of the findings can be attributed to these smaller licences, most can.

To provide small tenure holders an idea of what the Board finds during our audits, and some hints on how to avoid these issues, we have compiled a “Top 10 Audit Findings” list.

10 – Riparian Management

It is important that all licensees know where the streams are located near their active operations, specifically road construction and harvesting, and that they know if these streams are fish bearing. Awareness of the stream and the type of stream allows for appropriate planning. Excluding these streams from harvest areas where practicable, retaining forest cover in the management zone, establishing machine free zones, utilizing drainage controls and grass seeding exposed soils, are a few ways licensees can help minimize the introduction of soil or logging debris into those streams.



9 – Soil Disturbance

Soil disturbance is disturbance to the soils in the net area to be reforested, resulting from the construction of temporary access structures, including gouges, ruts, scalps or compacted areas. Without rehabilitation, disturbed sites may have reduced soil productivity and may be unable to provide optimum growing conditions for new trees. For that reason, maximum allowable amounts of soil disturbance are set in regulation.

In general, soil disturbance mostly occurs when operating machinery in wet soil conditions. This type of disturbance can be avoided by confining the timing of harvesting activities to periods of lower soil moisture.

8 – Seed Transfer Limits



Licence holders are responsible for ensuring that harvested areas are re-stocked with a sufficient number of well-spaced and desirable seedlings, grown from suitable genetic sources in accordance with the regulations. The chief forester of BC provides standards for seed use, including transfer limits for seedlings.

Seed transfer limits identify specific areas for seed use based on seed planning zones, elevation, latitude and longitude. The purpose of transfer limits is to quantify a *match* of seedlings with environments where the seedlings are suitably adapted so that the trees planted can perform optimally within environmental limits of climate, and soil. Planting trees outside identified seed transfer zones may have biological implications; trees may grow at a slower rate or be more susceptible to insects, disease, and weather events.

Licensees need to ensure when they order seedlings, that they know where the trees are to be planted and that they get the correct seedlings for that site.

7 – Avoiding Trespass

In order to avoid harvesting in areas that should not be harvested, it is very important to mark (flag) the cutblock boundaries, riparian reserve zones, wildlife tree patch and old growth management area boundaries, road locations, and other sensitive areas in the field, and also to communicate those directions to the person harvesting the timber. As a licensee, it is not good enough just to *hope* that your contractor knows where those important boundaries are located.

6 – Fire Protection

The *Wildfire Act* requires that a person who carries out timber harvesting activities minimize the risk of a fire starting and, when there is a risk of a fire starting, timber harvesting must be conducted according to applicable restrictions and an adequate fire suppression system must be kept at the activity site. The Act also requires an adequate number of fire tools on site. Licensees are required to monitor fire hazard conditions using representative weather stations, either installed on-site or using the most representative weather station monitored by the Fire Control Centre.

It is important for all licensees to ensure they are working only when it is safe to work and it is not enough to just have a fire suppression system on site; the system must be working and must be full of water!

In addition, the licensee must conduct a fire hazard assessment at prescribed intervals to determine if their activity has increased the risk of a fire and, if so, they must abate the hazard in a timely fashion. Upon request, assessments must be provided to an official.

5 – Road Maintenance

Several sections of FRPA establish requirements for road maintenance and state that the person responsible for a road or bridge *must ensure* that the road and structures are structurally sound and safe for industrial users, and that they are not adversely affecting a forest resource. This means that the person must take positive steps to *make certain* of these outcomes, including putting a system of checks and balances in place. It is important for all licensees to routinely inspect their roads and bridges, especially after major storm events, to ensure they are safe and are not creating environmental harm. It is also important to document these inspections to prove you are being duly diligent.

4 – Natural Surface Drainage Patterns

Legislation requires licensees to maintain natural surface drainage patterns both during and after road construction and temporary access structure construction. This is normally done by using culverts, however if temporary crossings (i.e., logs placed across the road) are used that do not maintain natural drainage patterns, they need to be removed by the end of construction, or before the next freshet, whichever is earlier.

In addition, natural surface drainage patterns must be maintained during harvesting, which requires the use and then removal of temporary access structures for skid trail crossings. Licensees must also ensure slash piles do not obstruct natural drainage patterns.

3 – Adherence to Professionally Prepared Plans

Licensees generally rely on the use of professionals to plan and perform the activities that will protect the various values found in the forest and ensure a satisfactory result on the ground. For those licensees required to have a site plan, although FRPA allows for deviations from site plans, it is usually not a sound forestry practice to do so without a documented, sound rationale, and without consulting a qualified registered professional. This is especially relevant for timber sale licence holders who bid on areas that generally include professionally prepared maps and plans.

2 – Obligations and Annual Reporting

Under FRPA and the WA, licence holders are responsible for a number of post-harvest obligations. These obligations include:

- timely completion of fire hazard assessments and abatement
- ensuring that harvested areas are re-stocked with a sufficient number of well-spaced and desirable seedlings within the specified timelines
- maintenance of roads and bridges
- measures to control the introduction and spread of invasive plants
- ensuring that harvested areas with reforestation obligations meet free-growing specifications
- annual submission of information specifying the nature of forest management activities that have been undertaken

Legislation requires that all licensees annually report to government, among other things, the forest cover information for areas where harvesting occurred, the amount of area harvested, the location and size of wildlife tree retention areas, the pertinent information about seeds used, where silviculture treatments have occurred or where the regeneration date or free growing has been met, or was due but not met. When cutblocks are not tracked in government's database (called Reporting Silviculture Updates and Land Status Tracking, or RESULTS) there is a risk that reforestation obligations will not be met.

It is very important that all licensees submit their information to RESULTS annually. (*Note: Different licence types have different reporting deadlines*). If you do not know how to use the system, hire somebody who does—annual reporting is a legal requirement.

1 – Bridge Construction

Bridge planning, design and construction on resource roads are governed by legislation and are overseen, in most cases, by professional engineers and professional foresters. Legislation specifies certain requirements for the planning, design and construction of bridges that are aimed at ensuring bridges are safe for industrial users and that forest resources such as water, soil and fish are protected.

Lack of compliance with the legislated requirements for the construction of a bridge has been a pervasive issue identified in compliance audits for the past several years, and was highlighted in the Board's March 2014 *Bridge Planning, Design and Construction Special Investigation* that assessed 216 bridges across 5 districts. The investigation found that a significant number of professionals and licensees were not following legislation and professional guidance when designing, installing and approving bridges used for forestry activities.

This issue seems to be prevalent across all licence types, not just the smaller licences.

In addition, in several audits it has been noted that a licensee called a crossing structure a culvert rather than a bridge. Although a bridge is not defined in FRPA, it is an accepted engineering practice that any structures greater than six metres are considered a bridge. Regardless of whether it is a bridge or a culvert, the structure must be safe for industrial users. A safe bridge or culvert includes sufficient lashing, adequate abutments, safe alignment (both horizontal and vertical) and the use of guard rails that are properly attached to the structure. If the structure is a bridge, then additional requirements must be met, including ensuring that the design and fabrication of the bridge meets or exceeds safety standards, preparing 'as-built,' or record drawings, of the bridge and retaining them until the licensee is no longer required to maintain the road.

Poorly constructed, unsafe bridge.



Professional guidelines (see link in Appendix A) state that every bridge must have a coordinating registered professional (CRP) who takes overall responsibility for the coordination of all of the services required for the crossing project. The CRP must determine that suitable field reviews have been carried out in order to provide the necessary as-built/record drawings and, finally, must sign and seal a crossing assurance statement. The intent is

that the assurance statement be finalized prior to vehicles using the bridge. All documentation must be retained and available for review.

As the licensee, it is your obligation to ensure that any bridges built under your licence are safe, and one way to meet that obligation is to ensure your professional provides you with these three time sensitive documents regarding crossings:

1. A general arrangement drawing (GD) which defines the design to fit the ground.
2. An as-built drawing (AB) that details the final design as it was built, noting any changes to the original design.
3. A conformance assurance statement (CAS) which is the sign-off document that the bridge was constructed and completed to standard. The CAS must be signed by a PEng or RPF.

Although poorly built bridges may not be the most prevalent audit finding, it is the most important because even one unsafe bridge is one too many!

After a licensee receives that phone call stating they have been selected for a Board audit, they need to get prepared. Although the lead auditor will give the licensee a call and walk through everything the auditors will need, here is a list of some of those items so you can get a head start.

- ✓ Locate the woodlot licence plan or forest stewardship plan and maps.
- ✓ Locate a copy of the management plan if there is one.
- ✓ Locate any guidance from government agencies that is relevant to your operating procedures.
- ✓ Locate relevant site plans (pre-harvest maps for woodlots) and any assessments.
- ✓ Make sure the silviculture records are up to date (the auditor will need to ensure seedlots and species are appropriate, that reforestation was completed in a timely manner and where silviculture treatments occurred).
- ✓ Ensure hazard assessments have been completed and you have a plan for abatement.
- ✓ If there are standard operating procedures or best management practices in place, make them available to the auditors.
- ✓ Make sure you have copies of the required documents for designed road and bridge construction.
- ✓ Compile the documentation of inspections (i.e., bridges, roads). Many small tenure holders are very good at watching the roads, but often poor at recording the fact. (Records can be simple diary entries – i.e., “Drove Rocky Road today – no concerns”).
- ✓ Make sure RESULTS is up to date.
- ✓ Double check the fire tools and the requirements for fire tools – and check up on your contractors!
- ✓ Field check the roads, bridges and blocks so there are no surprises when the auditors show up.
- ✓ If there is something on your licence that you are very proud of, let the auditors know as they would love to see it!

What can a small licensee do to prepare for a Board audit?

Useful Links



Forest Practices Board – <http://www.bcfpb.ca>

Federation of BC Woodlot Association Website -
<http://www.woodlot.bc.ca/index.html>

Ministry of Forests Lands and Natural Resource Operations woodlot information - <http://www.for.gov.bc.ca/hth/timber-tenures/woodlots/index.htm>

BC Community Forest Association Website - <http://www.bccfa.ca/>

Ministry of Forests Lands and Natural Resource Operations community forests information - <http://www.for.gov.bc.ca/hth/timber-tenures/community/index.htm>

Board Bulletin, Volume 10 – Woodlot Licences – What’s a Woodlot Licensee Required to do?

This bulletin is a useful reminder for not only woodlot licensees, but all small licensees. This bulletin can be found on the Board’s website at:

http://www.bcfpb.ca/sites/default/files/reports/010-V10_Information_Bulletin.pdf

Board’s special investigation – Bridge Planning, Design and Construction
http://www.bcfpb.ca/sites/default/files/reports/SIR38_Bridge_Planning_Design_and_Construction.pdf

Guidelines for Professional Services in the Forest Sector – Crossings.

This is the document your professional should be referring to while building a bridge - <https://www.apeg.bc.ca/getmedia/97dcbad3-5482-416a-9bc0-55b3c662e71a/APEGBC-Guidelines-for-Forest-Sector-Crossings.pdf.aspx>

The Chief Forester’s Standards for Seed Use can be found at:
<http://www.for.gov.bc.ca/code/cfstandards/>

Legislative Links

Legislation governing the Board and its work can be found at:

Forest Act

http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/96157_00

Forest and Range Practices Act

http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/00_02069_01

Forest Planning and Practices Regulation

http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/14_2004

Woodlot Planning and Practices Regulation

http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/21_2004

Wildfire Act

http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/00_04031_01

Wildfire Regulation

http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/11_38_2005