



**Forest
Practices
Board**

Audit of Forest Planning and Practices

*Amabilis Contracting Limited
Non-Replaceable Forest Licence A79575*

FPB/ARC/144
September 2012

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Audit Results

Background

As part of its 2012 compliance audit program, the Forest Practices Board selected Amabilis Contracting Limited's (Amabilis) non-replaceable forest licence (NRFL) A79575 for audit. Amabilis is part of the Pioneer Family Timber Partnership, based in Williams Lake.

Amabilis' NRFL lies within the Williams Lake timber supply area (TSA), and nearby communities include Williams Lake, Horsefly and Likely. The terrain of the interior plateau is flat to rolling and the predominant tree species is lodgepole pine. A map of the audit area appears on page 2.

Amabilis harvested approximately 143 000 cubic metres of timber during the two-year audit period. All harvesting was focused on salvaging lodgepole pine trees attacked by the mountain pine beetle.

Three professional foresters and a chartered accountant made up the audit team. Field work was carried out from June 18 to 22, 2012.

Additional information about the Board's compliance audit process is provided in Appendix 1.



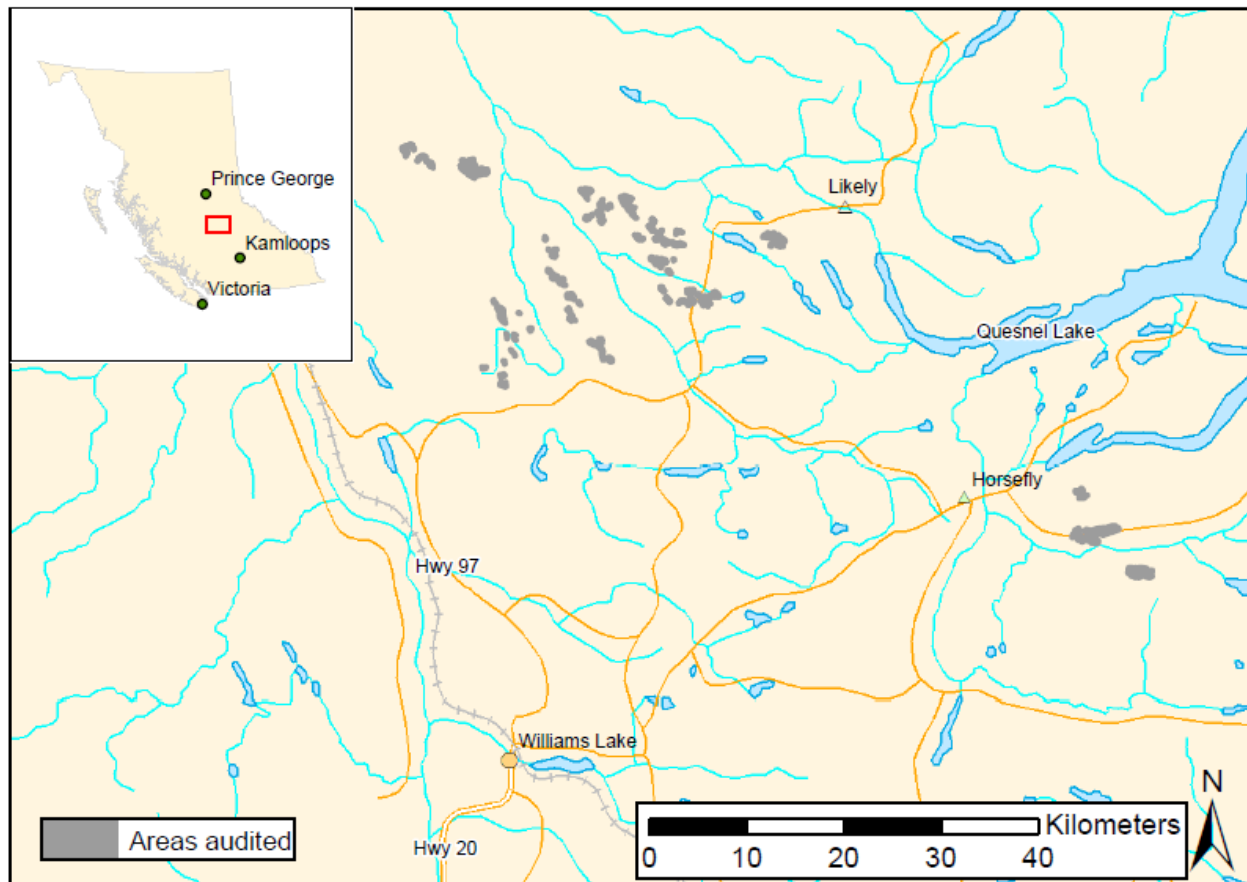
Rolling terrain east of Horsefly.

Audit Approach and Scope

The Board conducted a full scope compliance audit, in which all harvesting, roads, silviculture, protection activities and associated planning done between June 1, 2010, and June 22, 2012, were included in the audit. These activities and associated planning were assessed for compliance with the *Forest and Range Practices Act* (FRPA) and the *Wildfire Act* (WA), and related regulations.

The Board's Compliance Audit Reference Manual, Version 6.0, May 2003, and the addendum to the manual for the 2012 audit season set out the standards and procedures that were used to carry out this audit.

Map of Amabilis' Operating Areas



Planning and Practices Examined

Operational Planning

Amabilis' activities are subject to the Cariboo Chilcotin Land Use Plan (CCLUP). The CCLUP provides direction from government on how to manage public lands and resources within the plan area.

Amabilis planned activities in its 2007-2012 forest stewardship plan (FSP).¹ The FSP and stand level plans (site plans) were examined to ensure that they were consistent with legislated requirements. Site plans were also evaluated to ensure that they accurately identified site conditions through harvesting, road and silviculture field sampling.

¹ A forest stewardship plan (FSP) is a key planning element in the FRPA framework and the only plan subject to public review and comment and government approval. In FSPs licensees are required to identify results and/or strategies consistent with government objectives for values such as water, wildlife and soils. These results and strategies must be measurable and once approved are subject to government enforcement. FSPs identify areas within which road construction and harvesting will occur but are not required to show the specific locations of future roads and cutblocks. FSPs can have a term of up to five years.

Timber Harvesting

Forty-five cutblocks covering 1024 hectares were harvested during the audit period and 41 cutblocks totalling 980 hectares were sampled as part of the audit.

Road Construction, Maintenance, Deactivation

Amabilis is responsible for maintaining approximately 37 kilometres of road permit roads, of which the Board examined 30 kilometres. The licensee also built and deactivated 33 kilometres of road within cutblocks, of which the Board examined 31 kilometres.

Amabilis constructed a nine-metre steel girder bridge during the audit period and auditors examined it.

Silviculture Activities and Obligations

Amabilis planted 63 blocks during the audit period. Auditors examined 41 of those blocks in conjunction with harvest auditing. Amabilis made an agreement with a major licensee to assume silviculture responsibilities for three cutting permits and 27 of the planted blocks were planted by the major licensee's contractor.

Fire Protection

Hazard assessment and abatement activities were examined on 41 cutblocks in conjunction with harvest auditing. There were no active operations during the audit fieldwork.

Findings

The audit found the planning and forest activities undertaken by Amabilis Contracting Limited complied in all significant respects with the requirements of FRPA, WA and related regulations, as of June 2012.

Road Construction, Maintenance and Deactivation

No concerns were identified with road construction, maintenance or deactivation. Roads were stable and stream crossings were well maintained and in good condition. Roads were deactivated immediately after harvesting as equipment made its way to the next harvest block.

The single bridge built during the audit period was constructed in accordance with the plan and no concerns were identified.

While no concerns were identified, proactive management of a forest licence requires that a licensee; 1) knows about the roads and structures that it is responsible for; and 2) has a process in place to ensure that the maintenance obligations on these roads and structures are met. At the time of the audit, Amabilis did not keep a road ledger and did not have a process in place to ensure that it is fulfilling its road maintenance obligations. The risk of environmental damage to the few high-value resource features in the area (e.g., fish streams) is very low for this licence, and no issues were observed. However, in the future, issues could arise and as a result this is an

area requiring improvement. Subsequent to the audit, Amabilis informed the Board that it is implementing a system to manage road maintenance obligations.

Operational Planning

The FSP was consistent with legislated requirements. Planning at the landscape and stand levels was consistent with the FSP, the CCLUP and legal requirements.

Amabilis' site plans are thorough and detailed and each refers to applicable FRPA objectives and CCLUP objectives. For each of the relevant objectives, the site plans detail the result and/or strategy that Amabilis has in place to address the objective. Site-specific resources were addressed in the site plans by accurately identifying and prescribing practices for resource features, including streams and wetlands, wildlife habitat, cultural heritage features and recreation trails.

Timber Harvesting

Harvesting practices were consistent with site level plans. Soil disturbance was well managed and within FRPA limits and natural drainage patterns were maintained. Wildlife tree patches were preserved as planned and were situated to protect resources such as streams and trails. Deciduous species were retained where possible to provide some green trees in the dead pine-dominated landscape.

Silviculture Activities and Obligations

The only silviculture activity in the audit period was planting. The licence was issued in July 2006 and there were no regeneration or free-growing obligations due at the time of the audit. However, Amabilis has reforested all of its blocks promptly. All seedlings met the Chief Foresters Standards for Seed Use and there were no concerns with planting.

Fire Protection Activities

No concerns were identified with respect to hazard assessment and abatement. Fire hazard was assessed at the completion of harvesting and slash was either piled or piled and burned on all blocks. Fire-fighting equipment requirements were not audited.

Audit Opinion

In my opinion, the operational planning; timber harvesting; road construction, maintenance and deactivation; silviculture; and fire protection activities carried out by Amabilis Contracting Limited on non-replaceable forest licence A79575 between June 1, 2010, and June 22, 2012, complied in all significant respects with the requirements of the *Forest and Range Practices Act*, the *Wildfire Act* and related regulations as of June 2012. No opinion is provided regarding fire-fighting equipment requirements.

In reference to compliance, the term “in all significant respects” recognizes that there may be minor instances of non-compliance that either may not be detected by the audit, or that are detected but not considered worthy of inclusion in the audit report.

Without qualifying my opinion, I draw attention to the *Road construction, Maintenance and Deactivation* section which describes an area of improvement related to road management.

The *Audit Approach and Scope* and the *Planning and Practices Examined* sections of this report describe the basis of the audit work performed in reaching the above conclusion. The audit was conducted in accordance with the auditing standards of the Forest Practices Board. Such an audit includes examining sufficient forest planning and practices to support an overall evaluation of compliance with FRPA and WA.



Christopher R. Mosher CA, EP(EMSLA)
Director, Audits

Victoria, British Columbia
September 4, 2012

Appendix 1:

Forest Practices Board Compliance Audit Process

Background

The Forest Practices Board conducts audits of government and agreement-holders under the *Forest and Range Practices Act* (FRPA), section 122, and the *Wildfire Act* (WA). Compliance audits examine forest or range planning and practices to determine whether or not they meet FRPA and / or WA requirements.

Selection of Auditees

The Board conducts about 8 or 9 compliance audits annually. Most of these are audits of agreement holders. The Board also audits the government's BC Timber Sales Program (BCTS). This section describes the process for selecting agreement holders to audit.

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

For example, in 2010, the Board randomly selected the Mackenzie district as a location for an audit. After assessing the activities within that area, we discovered that a large licensee had recently closed operations due to financial problems. As the Board has expressed concern in the past about financially strapped companies failing to meet outstanding obligations, such as reforestation and road maintenance, and we knew that some of the licence area is very remote, the new licence holder was selected for audit.

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

Audit Standards

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

Audit Process

Conducting the Audit

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

A separate sample is then selected for each population (e.g., the cutblocks selected for auditing timber harvesting). Within each population, more audit effort (i.e., more audit sampling) is allocated to areas where the risk of non-compliance is greater.

Audit fieldwork includes assessments of features using helicopters and ground procedures, such as measuring specific features like riparian reserve zone width. The audit teams generally spend one week in the field.

Evaluating the Results

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

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

Auditors categorize their findings into the following levels of compliance:

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

Not significant non-compliance – where the auditor, upon reaching a non-compliance conclusion, determines that one or more non-compliance event(s) is not significant and not generally worthy of reporting. However, in certain circumstances, events that are considered not significant non-compliance may be reported as an area requiring improvement.

Significant non-compliance – where the auditor determines a non-compliance event(s) or condition(s) is or has the potential to be significant, and is considered worthy of reporting.

Significant breach – where the auditor finds that significant harm has occurred, or is beginning to occur, to persons or the environment as a result of one or many non-compliance events.

If it is determined that a significant breach has occurred, the auditor is required by the *Forest Practices Board Regulation* to immediately advise the Board, the party being audited, and the Minister of Forests, Lands and Natural Resource Operations.

Reporting

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

Once the auditor submits the draft report, the Board reviews it and determines if the audit findings may adversely affect any party or person. If so, the party or person must be given an opportunity to make representations before the Board decides the matter and issues a final report. The representations allow parties that may potentially be adversely affected to present their views to the Board.

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



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For more information on the Board, please visit our website at: www.fpb.gov.bc.ca

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Amabilis forestry operation near Williams Lake passes audit

VICTORIA – An audit of Amabilis Contracting Limited's forest operations around Williams Lake found they met the requirements of the Forest and Range Practices Act and the Wildfire Act, according to a report released today.

"The majority of harvesting by Amabilis was of lodgepole pine stands containing beetle-infested wood, and was well-managed," said board chair Al Gorley. "Amabilis was not in compliance with the requirement for a road-tracking system, but has since put one in place. However, this was not a significant concern because of the low-risk terrain in which they operate."

Amabilis' non-replaceable forest licence A79575 lies within the Williams Lake timber supply area in the Cariboo-Chilcotin District, and nearby communities include Williams Lake, Horsefly and Likely. The area is subject to the 1994 Cariboo Chilcotin Land Use Plan.

The audit field work took place from June 18 to 22, 2012.

The Forest Practices Board is B.C.'s independent watchdog for sound forest and range practices, reporting its findings and recommendations directly to the public and government. The board audits forest and range practices on public lands and appropriateness of government enforcement. It can also make recommendations for improvement to practices and legislation.

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More information can be obtained by contacting:

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