

FORESTRY AUDIT

# BC Timber Sales and Timber Sale Licence Holders

Cascades Natural Resource District



# TABLE OF CONTENTS

<b>BOARD COMMENTARY .....</b>	<b>i</b>
<b>AUDIT RESULTS .....</b>	<b>1</b>
Introduction .....	1
Background.....	1
Audit Approach and Scope .....	3
Planning and Practices Examined .....	3
Findings .....	5
<b>AUDIT ASSURANCE .....</b>	<b>9</b>
<b>APPENDIX 1: FOREST PRACTICES BOARD COMPLIANCE AUDIT PROCESS .....</b>	<b>10</b>

# BOARD COMMENTARY

As part of its annual audit program, the Forest Practices Board (the Board) conducted a full-scope compliance audit of BC Timber Sales (BCTS) activities in the BCTS Merritt Field Unit. Although this audit found that BCTS and timber sale licence (TSL) holders complied with most requirements under the *Forest and Range Practices Act* (FRPA) and *Wildfire Act*, the Board is concerned about some of the practices it observed.

In one instance, the mature trees that were intended to be left standing in a wildlife tree retention area (WTRA) were cut. For reasons described later in this report, this was not determined to be a non-compliance. Nevertheless, during development of the cutblock plans and prescriptions, a forest professional determined this area supported values that should be retained until the regenerating crop matures. A combination of poor communication and oversight by several parties resulted in retention falling short of the site plan target for the cutblock. This is not consistent with effective forest management.

The Board is also concerned with silviculture practices relating to free-growing declarations. In one case, BCTS declared a young stand free growing even though it was known to be heavily infested with western spruce budworm, a defoliator that can cause tree mortality. The declaration was made at an early stage, when there was a low likelihood that the stand would remain acceptably healthy through the free-growing period. In addition, for three different cutblocks, BCTS made free-growing declarations that were largely based on outdated survey data that could not be considered current, as required by legislation and defined in provincial survey guidance.

Accurate silviculture and forest cover data submitted alongside free-growing declarations is used to help prioritize incremental management of post-free-growing stands. The public interest is best served when free-growing declarations, which signal the end of basic silviculture obligations, are based on current, accurate data and when insect and disease incidence are accurately depicted.

Despite these concerns, the Board commends BCTS for its work in the aftermath of the November 2021 atmospheric river. This event impacted the road and bridge infrastructure in the Cascades Natural Resource District, including BCTS assets, forest service roads and public highways. This audit found that BCTS did a good job of managing risks to road users and forest resources through a combination of repairs, temporary closures and permanent closures.

# AUDIT RESULTS

## Introduction

The Forest Practices Board (the Board) is the public's watchdog for sound forest and range practices in British Columbia. One of the Board's roles is to audit the practices of the forest industry to determine compliance with the *Forest and Range Practices Act* (FRPA) and the *Wildfire Act*.

As part of its 2025 audit program, the Board randomly selected BC Timber Sales (BCTS) operations for audit in the Merritt Field Unit of the Kamloops Business Area, within the Cascades Natural Resource District. The audit included timber sale licence (TSL) holders operating in the area. Forestry activities were administered by the BCTS Kamloops Business Area office in Merritt.

This report explains what the Board audited and the results. Detailed information about the Board's compliance audit process is provided in [Appendix 1](#).



**Figure 1.** A harvest block where fire-damaged timber was salvaged.

## Background

The area subject to audit is throughout the Cascades Natural Resource District (the district) in the southern interior of BC. The district has a total landmass of over one million hectares and includes the Lillooet and Merritt timber supply areas (TSAs). Notable communities in the district include Lillooet, Lytton, Merritt and Princeton (Figure 2), and the area is accessed primarily by Highways 1, 3, 5 and 99.

The district includes a wide range of ecosystems, wildlife habitat, and soil types shaped by glacial activity, including dry grasslands, coniferous forests and alpine tundra. The district is made up of two physiographic regions.<sup>1</sup> The Cascade Mountains physiographic region is rugged, with steep valleys and varied local climates and ecosystems influenced by elevation and slope aspect. In contrast, the Thompson Plateau physiographic region is drier and continental, with rolling terrain and less steep ground.

BCTS operations throughout the district are within the territories of 71 First Nations. These Nations have been stewards of this land since time immemorial, and the Forest Practices Board acknowledges their deep connection with the land that continues to this day.

BCTS manages its operations from offices in Merritt with support in Kamloops, which is the headquarters for the business area. Staff prepare operational plans, auction timber sales, and issue TSLs and road permits. Once a timber sale is auctioned, the successful bidder receives a TSL, which authorizes them to harvest the auctioned timber. The licence holder is responsible for completing timber harvesting and road work associated with the TSL, and for meeting the requirements of road permits, operational plans and regulations.

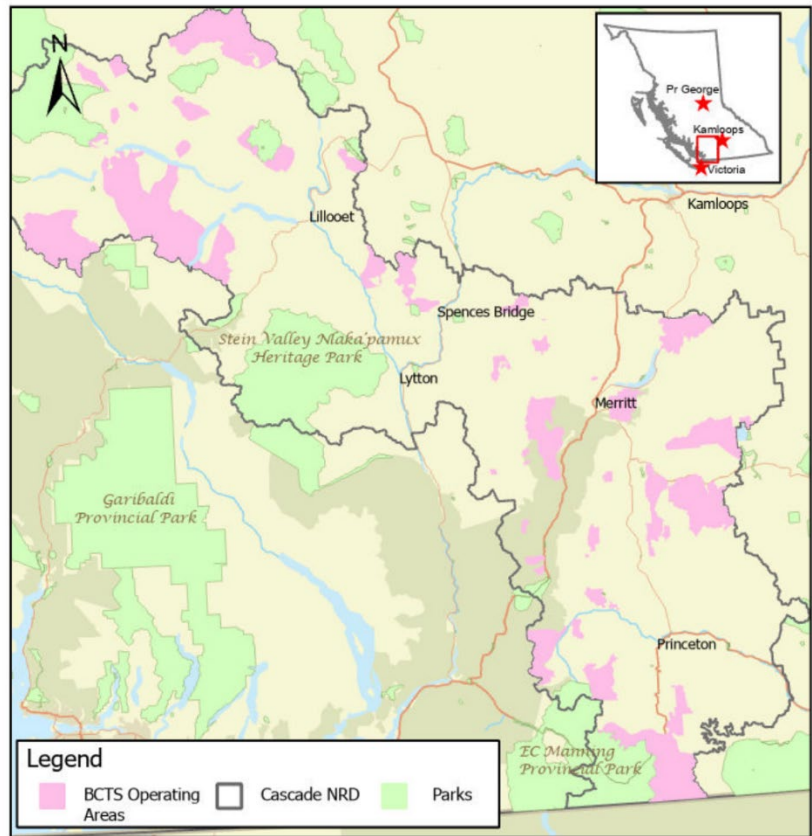


Figure 2. Map of the area subject to audit.

During the audit period of July 1, 2024, to July 25, 2025, approximately 120 000 cubic metres (m<sup>3</sup>) of timber was harvested from BCTS TSLs in the two TSAs. Its annual harvest apportionment in the district was approximately 180 000 m<sup>3</sup>—130 000 in the Merritt TSA and 50 000 in the Lillooet TSA. In 2021, BCTS reduced the volume available for auction due to old growth deferrals and anticipated changes to existing or planned TSL cutblock configurations, or entire TSLs being deferred. BCTS further reduced the volume to be auctioned based on concerns with First Nations related to values such as grizzly bear habitat and water quality, and culturally sensitive areas and access concerns.

In November 2021, intense rainfall caused widespread damage across the district. Major transportation routes were affected, including Highways 1, 5, and 99, as well as Highway 8 connecting Merritt and Spences Bridge. Damage to forestry roads and structures was also significant and widespread. This audit was an opportunity to determine whether BCTS identified damage to infrastructure it is responsible for and whether it created a plan to repair the damage or reduce risks of harm to road users and the environment.

## Audit Approach and Scope

This was a full-scope compliance audit with a one-year timeframe. All planning and activities carried out between July 1, 2024, and July 25, 2025, by BCTS and the TSL holders listed in Table 1 were subject to audit.

TABLE 1. Timber Sale Licences Subject to Audit

Timber Sale Licence	
A66963	TA2184
A93300	TA2284
TA2039	TA2747

BCTS is responsible for operational planning, including preparing the forest stewardship plan (FSP) and site plans, carrying out silviculture activities, and maintaining, constructing and deactivating forest service roads (FSRs) and associated major structures.<sup>1</sup>

Timber sale licence holders are responsible for timber harvesting, fire protection, and constructing, maintaining and deactivating most roads and crossing structures that connect to FSRs and are located within cutblocks.

The auditors assessed these activities for compliance with FRPA, the *Wildfire Act* and applicable regulations and legal orders. Audit work included interviews with BCTS staff, reviews of the FSP, site plans, and silviculture records, and site visits with BCTS staff to assess field practices. Sites were accessed by both ground and air.

The audit team consisted of five forest professionals. Field work occurred from July 21 to 25, 2025.

The standards and procedures used to carry out this audit are set out in the Board's *Compliance Audit Reference Manual, Version 7.1, July 2016*.

## Planning and Practices Examined

### BCTS Responsibilities

#### Operational Planning

BCTS planned its activities under the *Merritt/Lillooet Timber Supply Area Forest Stewardship Plan Amendment #10 (FSP 109)*. Auditors reviewed FSP 109 and all stand-level site plans in the harvest population to determine if legal requirements were met. They also compared site plans to ensure that FSP commitments were addressed. During field sampling, auditors assessed whether site plans reasonably characterized site conditions.

There were no legally established higher-level plans that applied to the audit area. However, some operations were constrained by values that were protected by *Government Actions Regulation (GAR)* orders and section 7 notices. BCTS operations and activities in the Lillooet TSA were guided by the *Lillooet Land and Resource Management Plan (LRMP)*.

<sup>1</sup> Major structure includes bridges and major culverts. Bridges are defined as temporary or permanent crossing structures where the superstructure is either prefabricated or built with logs. A log structure is considered a bridge when the span length equals or is greater than 6 metres or the abutment height is 4 metres or greater for any span length. Major culverts include round pipes with diameters of 2 metres or greater, or pipe arches with openings greater than 2.13 metres.

The following values were also applicable to the audit:

- **Wildlife:** including ungulate, goat, and moose winter ranges, and wildlife habitat areas for species such as coastal tailed frog, grizzly bear, western screech owl, spotted owl and Williamson’s sapsucker.
- **Landscape level biodiversity:** old growth management area (OGMA) polygons and replacement areas for polygons that were burned and subsequently salvaged.
- **Watershed management:** designated community watersheds and fisheries-sensitive watersheds.

### Road and Major Structure Construction, Maintenance, and Deactivation

BCTS maintained 1233.8 kilometres of FSRs and 65 major structures during the audit period. It built 2 bridges and was in the process of constructing 10.4 kilometres of road. BCTS did not deactivate any roads or major structures during the audit period.

Auditors sampled 324.6 kilometres of FSRs and 33 structures for maintenance, as well as the FSR section and bridges constructed during the audit period.

### Silviculture Obligations and Activities

BCTS carried out brushing and planting activities, and had obligations related to regeneration and free growing (FG). The population and sample are summarized in Table 2.

TABLE 2. Population and Sample Summary for Silviculture Activities and Obligations

Obligations and Activities*	Population (Cutblocks)	Sample (Cutblocks)
Brushing	5	2
Planting	14	7
Regeneration Obligations (Due or Declared)	35	11
Free-growing Obligations (Due or Declared)	92	44

\*Includes an assessment of compliance with annual reporting requirements for all cutblocks in the population and an assessment of conformance with the Chief Forester’s Standards for Seed Use for the planting population.

### Timber Sale Licensee Responsibilities

#### Timber Harvesting

Six TSL holders harvested 13 cutblocks covering a total of 499.5 hectares. Auditors examined all harvested cutblocks. The population and sample are summarized in Table 3.

TABLE 3. Population and Sample Summary for Harvest Activities

Timber Sale Licence	Number of Cutblocks	Area Harvested (ha)	Cutblocks Field Sampled
A66963	3	65.7	3
A93300	1	64.1	1
TA2039	3	45.6	3
TA2184	2	39.9	2
TA2284	1	91.1	1
TA2747	3	193.1	3

## Road and Major Structure Construction, Maintenance and Deactivation

Timber sale licence holders constructed 22.4 kilometres of road and deactivated 13.3 kilometres of road. They did not construct or deactivate any major structures. Auditors sampled 12.6 kilometres of road construction and 3.4 kilometres of road deactivation.

## Wildfire Protection

Auditors examined fire preparedness, fire hazard assessments and fire hazard abatement practices. The population and sample for wildfire protection activities are summarized in Table 4.

TABLE 4. Population and Sample Summary for Wildfire Protection and Preparedness Activities

Obligations and Activities	Population (Cutblocks)	Sample (Cutblocks)
Fire Preparedness	1	1
Hazard Assessment	12	12
Hazard Abatement	18	18

## Findings

The audit found BCTS's and TSL holders' planning and practices generally complied with FRPA and the *Wildfire Act* as of July 2025. However, the audit identified issues related to FG declarations.

### BCTS Responsibilities

#### Findings of Note

##### Free Growing Declarations

A key objective of BC's timber tenure system is to ensure that the holders of silviculture obligations meet their legal regeneration requirements and achieve FG status. FG is defined in the *Silviculture Survey Procedures Manual* (April 2023) as follows:

Free growing trees are the subset of well-spaced trees that not only meet the minimum free growing height criteria, but are healthy, with growth not impeded by competition from plants, shrubs, and other trees. It is the stand of trees that we can expect to produce a commercially valuable crop tree. The assessment process is conducted at two levels: at the tree level and the stratum level.

In its FSP, BCTS committed to meeting legal stocking standards for individual trees and strata to achieve its FG obligations. BCTS staff stated that they declare cutblocks or standards units (SUs) as FG once they determine that these standards have been met. This declaration is intended to relieve BCTS of any further silviculture obligations under FRPA, based on the expectation that the stand will develop into commercially valuable trees.

Auditors identified two non-compliances and two unsound practices that show shortcomings in BCTS's processes for ensuring that all FG criteria are met by the late free-growing (LFG) date or at the time of declaration.

1. Under section 44(1) of the *Forest Planning and Practices Regulation* (FPPR), BCTS is required to establish FG stands by the LFG date specified for each cutblock. No FG declaration was made by the LFG date for cutblock A68076-1. This is a non-compliance.

2. Section 29(2) of FRPA requires BCTS to establish FG stands that meet the standards listed and committed to in its FSP. In cutblock 3 under TSL A79596, the minimum stocking standards for preferred species were not met when the cutblock was declared FG. This is a non-compliance.

These two non-compliances indicate flaws in BCTS's system for tracking its obligations and are areas requiring improvement. After the audit, BCTS amended their stocking standards and subsequently met the minimum FG requirements for preferred species in cutblock 3 under TSL A79596.

3. Three cutblocks (A79596-3, A80961-5, and A86753-SI73T) were declared FG during the audit period. Each cutblock contained two strata that were surveyed at different times. The smaller strata (20 percent or less of the SU area) were surveyed during the audit period. However, the larger strata in each block (80 percent or more of the area in their respective SUs) were surveyed between three and five years earlier.

The *Silviculture Survey Procedures Manual* (April 2023) recommends using survey data collected within 18 months of an FG declaration date to ensure that forest cover information reflects current information. BCTS did not document why it departed from this guidance, nor could it demonstrate that this alternative met precision standards required under the FPPR. This is considered an unsound practice.

4. Cutblock A91297-CO7XU had an LFG date of January 25, 2036, but was declared FG on August 22, 2024. The declaration was based on a 2024 survey that found 93 percent of live trees were affected by western spruce budworm (*Choristoneura occidentalis*), a defoliator of conifer trees. The survey identified the infestation as a major forest health concern but assessed the severity as relatively low.

When auditors sampled the cutblock the following year, they did not agree that the severity of ongoing defoliation was low. Auditors are concerned that ongoing defoliation could result in tree mortality and reduced growth and vigour, and that portions of the cutblock may not meet the stocking requirements by the LFG date. The Board is also concerned that low vigour or sparse stocking may not produce the desired timber stand at rotation.

Auditors concluded that BCTS had sufficient time to continue monitoring the infestation and ensure that FG criteria would be met before declaring the block as FG. While the long-term outcome for the stand is not yet known, declaring the cutblock FG during an active pest epidemic, with 11.5 years remaining before the LFG date, is considered an unsound practice.

## General BCTS Findings

### Operational and Site Planning

The results and strategies in FSP 109 incorporated guidance from the Lillooet LRMP and legal requirements of GAR orders that apply to forest practices in the audit area. BCTS maintained accurate records of planning and operational activities, and files were complete and readily available to auditors.

Site plans aligned with the FSP and appropriately addressed site-specific values by accurately identifying features, including sensitive soils, visual quality, riparian areas and fish streams. Site plans also prescribed practices to effectively manage site-specific resources. BCTS completed resource assessments at the landscape, operational and site levels where required, and included recommendations from the assessments in its site plans.

Auditors found that BCTS's operational planning met the legal requirements.

### Road and Major Structure Construction

At the time of field sampling, some work remained to be completed on the 10.4-kilometre section of FSR to be fit for industrial use, but it was driveable by pickup truck. This project included reactivating some existing road segments and connecting them with new construction segments. The auditors found that drainage patterns were maintained and had no concerns related to road user safety or environmental risk.

BCTS also built two bridges to replace crossings that were damaged by the November 2021 storm event. Qualified professionals were used to oversee the projects, and the required documentation was complete. Stream channels and banks were protected, and natural drainage pathways were maintained. The auditors had no concerns with bridge construction.

### Road and Major Structure Maintenance

BCTS identified damage to roads and structures caused by the November 2021 storm event. BCTS has either repaired, planned to repair in a reasonable timeframe, or closed inactive roads to reduce the risk of harm to road users. Auditors did not identify road sections or crossings that had ongoing risks of harm to environmental resources.

#### Road Maintenance

BCTS inspected and, if necessary, maintained FSRs to ensure the structural integrity of road prisms. All culverts examined were functional and effectively controlled water drainage. Auditors did not observe any road failures that could be attributed to a lack of due diligence. Active roads were safe for industrial use, drainage systems were functional and natural drainage patterns were maintained.

#### Major Structure Maintenance

BCTS worked in conjunction with the Ministry of Forests' South Regional Engineering Group to inspect and maintain major structures on FSRs. Structures on all sampled active roads were inspected regularly and adequately maintained.

BCTS's road and major structure maintenance practices met the legal requirements.

### Silviculture Activities and Obligations

BCTS planted all sampled cutblocks with suitable tree species and conformed with seed transfer requirements. Regenerating stands contained healthy, well-spaced trees and were on track to meet FG requirements within required timeframes.

BCTS managed its regeneration obligations by planting promptly in its cutblocks and monitoring plantation survival. Auditors found that BCTS met regeneration delay requirements and most FG obligations under legislation and committed to in its FSP.

BCTS surveyed all cutblocks before declaring them FG. Except for the cutblocks noted earlier in this report, surveys provided accurate forest cover information that was submitted to government databases. Auditor field observations confirmed that BCTS met most silviculture obligations.

BCTS met annual reporting requirements in all significant respects, reporting its activities to government in a timely and accurate manner.

Auditors found that BCTS's silviculture obligations and activities complied with FRPA requirements.

## Timber Sale Licensee Responsibilities

### General TSL Holder Findings

#### Harvesting

The TSL holders conducted harvesting in accordance with legislative requirements and followed site plan prescriptions. Riparian areas along streams and non-classified drainages within cutblocks were protected with machine-free zones and retained vegetation next to streams. Natural drainage patterns were maintained during and after harvest, and soil disturbance was below site plan limits.

Wildlife tree retention area (WTRA) commitments in the FSP were achieved in all cutblocks. In one instance, mature trees in a WTRA were mistakenly cut down. Evidence showed the WTRA was marked with the wrong ribbon type, making it appear as if the reserve was available for harvest. As a result, retention did not meet the target in the cutblock site plan. However, retention levels still exceeded the FSP commitment made for all cutblocks and TSLs. This incident highlighted the value in planning for retention above minimum levels as a failsafe and the importance of ensuring field markings for harvest boundaries and reserve features match the plan and maps.

Auditors found that harvesting activities carried out by TSL holders complied with FRPA requirements.

#### Road Construction, Maintenance, and Deactivation

##### Road Construction

Construction included building permanent and temporary access roads. When constructing roads, TSL holders followed site plans and installed culverts that maintained natural drainage patterns. The roads were safe and stable, and auditors had no concerns.

##### Road Maintenance

Maintenance activities included grading, clearing ditches and culverts to ensure good drainage, and cutting brush to provide safe sight lines. Sampled roads were safe for industrial use, culverts and ditch lines were free from obstructions, and natural drainage patterns were maintained. Auditors had no concerns with roads maintained by TSL holders.

##### Road Deactivation

Deactivation included both full and partial rehabilitation. Full rehabilitation will allow for planting crop trees and partial rehabilitation will allow access for silviculture workers to fulfill reforestation obligations. Natural drainage patterns were maintained, and auditors had no concerns with deactivation activities.

## Wildfire Protection

At the active site audited, road construction was the only activity underway. Contractors monitored the appropriate weather station and correctly identified the fire danger class when questioned. All machines had fire tools, and two portable water tanks were on-site and equipped with pumps and hoses that appeared to be in good working order. There was a water source nearby to fill the water tanks. The auditors had no concerns with fire preparedness at the active site.

Fire hazard assessments were provided and generally complied with requirements, with nearly all completed within required timeframes. The risks of fuel hazard, ignition and spread were included in the assessments. BCTS provided support for assessment standards, including reviews for completion of work for bid deposit refunds. Auditors had no concerns with fire hazard assessments.

TSL holders piled slash during and shortly after harvesting. Slash piles were located a safe distance from standing timber, except in one instance that resulted in a minor fire escape. Slash loads were reduced below abatement thresholds required in the *Wildfire Regulation* and identified in *A Guide to Fuel Hazard Assessment and Abatement in British Columbia* within the timeframe specified in the *Wildfire Regulation* in cutblocks that were sampled during the audit period.

Auditors had no concerns with wildfire protection.

# AUDIT ASSURANCE

This audit was conducted in accordance with the auditing standards of the Forest Practices Board, including adherence to the auditor independence standards and the ethical requirements, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. Such an audit includes examining sufficient forest planning and practices to support an overall evaluation of compliance with the *Forest and Range Practices Act* and the *Wildfire Act*.



Francis Njenga  
Director of Audits

Vancouver, British Columbia  
April 17, 2026

# APPENDIX 1: FOREST PRACTICES BOARD COMPLIANCE AUDIT PROCESS

## Background

The Forest Practices Board conducts periodic audits of government and licensees to determine compliance with Parts 1.1 to 5 of the *Forest and Range Practices Act* (FRPA), and Parts 1 and 2 of the *Wildfire Act*, and associated regulations and standards.

## Selection of Auditees

The number, type and scope of audits to be conducted each year are established by the Director of Audits in accordance with the Board's strategic priorities and budget. Once a licence has been audited, it is removed from the audit selection pool for five years.

The Board randomly selects districts or timber supply areas (TSAs) from each of the three natural resource areas of 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 Board audits in that district or TSA. These factors are considered 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 suits the selected risk and priorities. This is considered a qualified random approach of selection.

In addition, each year, the Board randomly selects at least 1 of the 31 BCTS field units for audit.

## Audit Standards

Audits are conducted in accordance with auditing standards developed by the Board and described in the Board's *Compliance Audit Reference Manual*. The standards are based on Canadian generally accepted auditing standards and relevant ethical requirements. This includes those pertaining to independence, as published by the Chartered Professional Accountants of Canada, and consistent with the *Canadian Standards on Assurance Engagements* (CSAE) 3001, the *Conformity assessment – Requirements for bodies providing audit and certification of management systems* (ISO 17021-1:2011), and the *CPA Code of Professional Conduct* (CPABC Code – June 2015).

## Audit Process

### Conducting the Audit

Once the Board selects a licence or BCTS field unit for audit, the next step is to determine the scope of the audit (timeframe, activities). For the timeframe, the Board normally examines activities that took place over a one or two-year time period up to the start of the audit fieldwork (i.e., looking back two years). This is referred to as the audit period.

For a full-scope compliance audit, all activities carried out during the audit period are identified, which may include harvest, silviculture, fire protection and road-related activities. These activities form the population.

From the population, the auditors select a sample of each activity to examine in the field. Generally, auditors will concentrate on sampling where the risk of impacts to forest resources is deemed to be high. This is called the *inherent risk*. It can be a function of site conditions, natural circumstances, and the particular forest or range practices involved. Proportionally, more sampling occurs where the inherent risk is high because the higher the risk, the higher the likelihood of significant non-compliance or failure to achieve specified results.

For smaller audits, the sample may include the full population. Auditors also consider factors such as geographic distribution and values potentially affected by activities to ensure an adequate sample size.

Auditors' work includes interviewing licensee staff, reviewing the auditee's applicable plans, and reviewing applicable legal orders, observations, inspections, and assessments in the field.

### Evaluating the Results

The Board recognizes that compliance with the requirements of FRPA and the *Wildfire Act* 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 legal 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 *Wildfire Act* requirements.

***Unsound Practice*** – where the auditor identifies a practice that complies with FRPA or the *Wildfire Act*, but may adversely affect a forest resource.

***Areas Requiring Improvement (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. In certain circumstances, these events 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 more non-compliance events.

If an auditor identifies a probable significant breach of the legislation, the auditor is required by the *Forest Practices Board Regulation* to immediately advise the Board, the party being audited, and the responsible minister(s).

## Reporting

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

The Board reviews the draft report and may make recommendations and/or provide commentary on the audit findings. The Board must, prior to publishing a report or recommendation, consider whether or not it may adversely affect a party or person. The Board must give any affected party or person the opportunity to review, rebut or clarify the information before the Board publishes its report. The final report is released to the auditee first and then to the public and government seven days later.

## ENDNOTE

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<sup>1</sup> Holland, S.S. (1976). *Landforms of British Columbia: A physiographic outline* (Bulletin No. 48). British Columbia Department of Mines and Petroleum Resources.



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