

2018-2022 AUDIT SEASONS

SUMMARY OF FINDINGS

SPECIAL REPORT

JUNE 2024

TABLE OF CONTENTS

INTRODUCTION	1
How We Audit	1
Who We Audit	3
Where We Audit	4
OVERALL FINDINGS	4
Findings by Activity Category	6
Summary of Incident Rates	11
CONCLUSIONS	12
APPENDIX 1: AUDIT REPORTS 2018-2022	14

INTRODUCTION

The Forest Practices Board (the Board) serves the public interest as the independent watchdog for sound forest and range practices in British Columbia. The Board encourages sound management that instills public confidence and continuous improvement through the fair and equitable application of the *Forest and Range Practices Act* (FRPA) and the *Wildfire Act*.

Since 1997, the Board has undertaken audits to assess compliance with forest and range legislation.¹ Under section 122 of FRPA and section 68 of the *Wildfire Act*, the Board must carry out periodic independent audits in accordance with the regulations and has developed standards for these purposes.² This special report summarizes findings from 43 audits undertaken between 2018 and 2022. We identify trends that call for improvements in meeting legal obligations by tenure holders and government. This report focuses only on the Board's audit work and explains the audit process, including who is audited, where audits occur, and, when relevant, how they are resolved.³ The report does not account for the Board's other work, which includes responding to public complaints, participating in appeals, producing special reports, and conducting special investigations.

The Board has a unique role, bearing witness to the forest and range management across the entire diversity of tenure types, and geography of British Columbia's public lands. Under section 135 of FRPA, the Chair of the Board may make a special report about a matter they consider to be in the public interest.

This special report summarizes trends and opportunities for improving sound forest and range management and shares those findings with the public, industry, and government.

How We Audit

The Board independently audits forest and range licensees regularly across the Province, focusing on compliance with legislation. Auditors collect and evaluate evidence through interviews, review of plans and legal orders, and fieldwork to assess whether forest and range planning and practices meet FRPA and the *Wildfire Act* requirements, including alignment with government objectives for forest and range resources. The Board's audit standards are consistent with national auditing methodologies⁴ to determine compliance with the law and evaluate the effects on forest resources.

Auditors randomly choose an area within the Province, such as a natural resource district. They then assess the selected area's forest resources, geographic features, operating conditions, and

¹ The Forest and Range Practices Act and the Wildfire Act.

² https://www.bcfpb.ca/board/policies/audits/compliance-audit-reference-manual-version-7/

³Resolution of issues are reported only at the time of audit publication. The audit report typically details the efforts undertaken by the auditee prior to publication, and therefore may omit resolutions to issues that occur after each audit report is made public, unless the Board makes a recommendation. In the case of a recommendation, the outcome is reported some months after the audit report is published.

⁴ Generally Accepted Audit Standards, ethical requirements of the Chartered Professional Accountants of Canada, Canadian Standards on Assurance Engagements (CSAE 3001), Conformity assessment – Requirements for bodies providing audit and certification of management systems (ISO17021:2011); and the CPA Code of Professional Conduct (CPABC Code – June 2015).

other relevant factors. These assessments are aligned with the Board's strategic priorities to determine the audit type. Next, auditors select the licences that align best with the identified risks and priorities. Only licences or BCTS operations not audited by the Board in the last five years are eligible for selection. The past performance of a licensee is not part of the selection criteria.

After completing an audit, the Board publishes a report with findings by category of forest and range activities and obligations. For forestry audits, these categories include operational planning, harvesting, silviculture, roads and bridges, and wildfire protection. For range audits, findings are reported by adherence to a range use plan and practice requirements, protection of riparian and upland areas, and authorization and maintenance of range developments. Each audit report is published on the Board's website (Appendix 1).

Audit reports divide findings into several categories. Auditors may report an activity or obligation as compliant or as a notable practice if it had a positive social or environmental effect beyond compliance with legislation and industry standard practice. Findings of the Board are divided into the following categories:

In compliance is a practice that meets the *Forest and Range Practices Act* and the *Wildfire Act* requirements.

Unsound practice is a practice that is compliant with legislation but is not considered sound management. If repeated by the auditee, it will likely harm personal safety or the environment.

An area requiring improvement is a practice that is not compliant with legislation and, while not significant, is of sufficient magnitude to report on. For example, the event might be an isolated occurrence, or of limited geographic scope with a low environmental, social, or economic consequence, or an unintentional consequence of low severity.

Significant non-compliance is a practice that is not compliant with legislation and has resulted in or is likely to result in harm to persons or the environment.⁵

Significant breach is when one or more of the requirements is breached that has caused or is beginning to cause significant harm to persons or the environment.

After an audit, the Board can make recommendations to the auditee, government, or the association that governs registered professionals. The Board may make recommendations when, for example, results are not met, strategies are not developed or followed, or risks are not adequately assessed and managed. For example, the Board might recommend correcting omissions or delays, revising or cancelling decisions, or altering a practice, procedure, or course of conduct.

⁵ "Harm", for the purpose of FPB's compliance audits, is defined as an adverse change from existing conditions.

Who We Audit

The Board audits government, forestry and range licence holders. Auditees include holders of replaceable and non-replaceable forest licences, woodlot licences, tree farm licences, community forest agreements, timber licences, and First Nations woodland licences. The Board audits British Columbia Timber Sales (BCTS) and timber sale licence holders. Other tenures the Board audits include licences to cut and grazing and hay-cutting licences and permits. The Board occasionally audits government obligations, such as a District Manager's responsibilities for forest service roads.

Over the 5 years, the Board completed 43 audits, including 27 small to large forest tenure holders and 9 BCTS business areas (Figure 1).⁶ The Board also audited three natural resource district managers for road obligations and four range tenures.

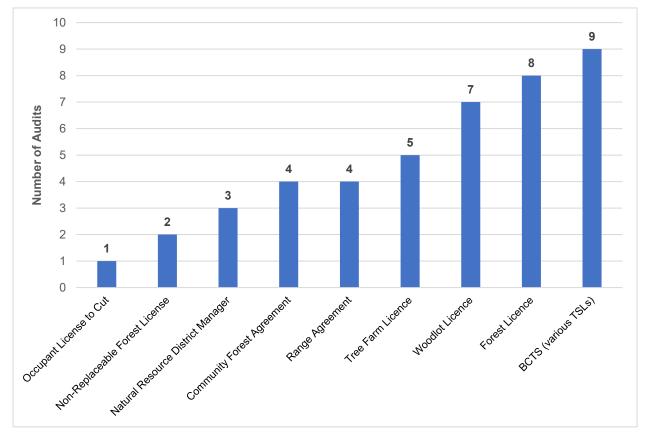


Figure 1. Types of auditees and number of audits conducted between 2018 and 2022.

⁶ BCTS audits include dozens of timber sale licenses.

Where We Audit

Over the 5 years, the Board conducted audits within 20 of 23 natural resource districts across the Province (Figure 2).



Figure 2. Map of the Board's compliance audits between 2018 and 2022. The unique report identifiers (e.g., ARC254) can be cross-referenced with reports listed in Appendix 1.

OVERALL FINDINGS

Audits found that licensees mostly complied with the law. Twelve percent of findings were non-compliant, with five percent significant noncompliance (Figure 3). Figure 4 summarizes findings by category of forest and range activities and obligations. For a detailed list of audit reports in this review period, refer to Appendix 1.

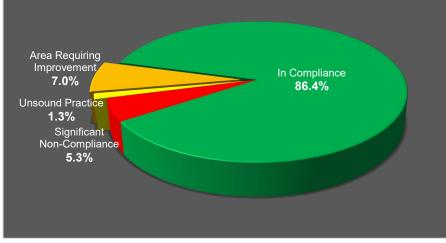
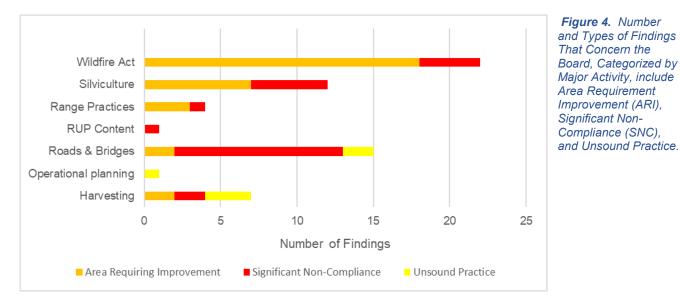


Figure 3. Distribution of findings in all audits from 2018 to 2022.



Because audits vary in size and complexity, and the number of audits the Board carries out each year changes, the number of findings alone can't be used to compare trends between audits. However, we can account for the audit size and complexity using an incident rate, which measures the frequency of findings in the samples^{*} of each audited activity or legal obligation. Figure 5 shows the forestry audit incident rate between audits, where 1 finding for 10 samples is assigned an incident value of 0.1. This metric captures the general performance of the auditee and shows the compliance level across the entire scope of the audit. A lower incident rate suggests better overall compliance, whereas a higher rate could signal systemic issues that require attention.

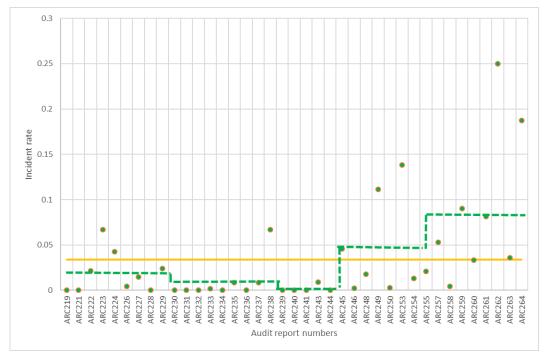


Figure 5. Forestry audit incident rates from 2018-2022. The orange horizontal line is the average for the data period. Points are the average incident rate per audit. The dashed green line is the annual average incident rate for forestry audits, with changes reflecting each year within this review period.

* A sample being a cutblock, kilometer of road, or stream crossing.

This five-year review has highlighted that not all forest tenure types perform equally. Woodlots audited during this period had the highest incident rates among forestry tenures, with 1 finding for every 14 samples^{*}, starkly higher than tree farm licences audited, at 1 finding per 451 samples (see Table 1).

TENURE TYPE	SAMPLES PER FINDING	INCIDENT RATE
Tree Farm Licence	451	0.2%
Timber Sale Licences and BCTS	157	0.6%
Community Forest Agreement	127	0.8%
Forest Licence	101	1.0%
Occupant Licence to Cut	57	1.8%
Woodlot Licence	14	7.3%

 Table 1. Samples* per Finding by Tenure Type Audited

* A sample being a cutblock, kilometer of road, or stream crossing.

Findings by Activity Category

This next section outlines the Board findings by activity categories, which include harvesting, silviculture, roads and bridges, *Wildfire Act* requirements, and range. Each provides examples representing the findings reported over the reviewed period, focusing on significant non-compliances.

Harvesting

The Board auditors field-reviewed 675 cutblocks between 2018 and 2022. For this category, auditors review compliance for elements such as site plans and professional assessment, including cutblock layout, soil disturbance limits, or the placement of retention areas. One non-compliance was found for every 96 sampled cutblocks. The Board found 3 unsound practices, 2 areas requiring improvement, and 2 significant non-compliances.

Significant non-compliance

Licensees must identify and classify streams, lakes, and wetlands. The area reserved, or the number of trees retained beside these riparian features, is determined by how the waterbody is classified. Once classified, a licensee must not cut, modify or remove trees in a riparian reserve zone. In 2018,⁷ in woodlot W2101, northwest of Hudson Hope, Board auditors found significant non-compliance when the licensee misclassified a stream and harvested within a riparian reserve zone in six cutblocks.

Licensees must also manage visual quality objectives (VQOs), ensuring harvesting is consistent with government-established VQOs. These range from harvesting that is not easily distinguishable from the pre-harvest landscape (e.g., preservation) to very easy-to-see and largescale harvesting (e.g., maximum modification). In 2022, in Woodlot W2046 near Campbell River,⁸ Board auditors found the licensee did not meet the established VQOs when it harvested four cutblocks inside an area with a VQO of partial retention.

⁷ Audit report ARC229

⁸ Audit report ARC264

Silviculture

Between 2018 and 2022, the Board auditors' field reviewed 669 blocks declared as free-growing, 449 cutblocks recently planted, and an additional 421 blocks for meeting regeneration milestones, along with examining other legal obligations. There was 1 finding for every 147 sampled cutblocks. Seven findings of area requiring improvement and 5 significant non-compliances were found.

Significant non-compliance

FRPA requires that forest licensees update forest cover inventories post-harvest, report on regeneration, confirm free-growing status, and document any silviculture treatments conducted before a certain date. The Board found 2 significant non-compliances regarding licensees not meeting obligations for reporting through the RESULTS⁹ database. In 2019, in the Quesnel District, the Board found that BCTS had not reported over 80 percent of the harvest and silviculture samples audited on time.¹⁰

Likewise, in 2021, in the Coast Mountains Resource District (Terrace), the Board found that BCTS had not reported over 25 percent of the samples of the harvest and silviculture treatments on time.¹¹ By the time the audit report was published, BCTS had completed the outstanding reporting and adopted internal procedures to ensure compliance in the future. In 5 other audits, auditors found similar instances of failing to meet reporting requirements across various licence types. However, these were less pervasive and classified as areas requiring improvement.

After harvesting, a forest licensee must achieve free-growing status by regenerating the area with prescribed tree species to a designated height and density within a set timeframe. The Board found two significant non-compliances where free-growing requirements were not met. On an audit in the Kispiox TSA in 2021, Gitxsan Forest Licence Inc. was found to have not fulfilled free-growing criteria in 6 out of 10 cutblocks reviewed.¹² This significant non-compliance originated from a delay in reforesting the sites after harvesting almost 20 years after the original license owners entered receivership. When the Board published the audit report, the licensee had submitted site plan amendments and retained a consultant to develop a mitigation plan to address these legacy concerns.

Near Gold River, Board auditors found a similar issue on Woodlot W2046 in 2022.¹³ The licensee, Matchlee General Partner Ltd., had not surveyed a cutblock, had not met stocking standards or provided a regeneration plan, and had not complied with free-growing requirements by a specified date. When the Board published the audit report, the licensee notified the district manager and submitted a regeneration plan to establish a free-growing stand in the cutblock.

⁹ Reporting Silviculture Updates and Land Status Tracking System (RESULTS)

¹⁰ Audit report ARC238

¹¹ Audit report ARC253

¹² Audit report ARC248

¹³ Audit report ARC264

Forest licensees are required by law to follow the *Chief Forester's Standards for Seed Use*, which establishes requirements for registering and transferring seeds based on climate and ecosystem classifications. The standards aim to maintain genetic diversity, adaptability, and productivity of forest resources in BC. During an audit of Skeena Sawmills in 2018 near Terrace,¹⁴ the Board found that 25 percent of planted seedlings were outside the elevation ranges specified under the chief forester's standards, leading to significant non-compliance.

Roads and Bridges

During 2018-2022, Board auditors inspected 884 kilometres of road construction, 798 crossings, an additional 122 bridge maintenance structures, 76 newly built crossings, and over 10 000 kilometres of road maintenance. One finding of concern was found for every 299 kilometres of road sampled and 1 for every 237 crossing structures sampled. Two findings of unsound practice, 2 of areas requiring improvement, and 11 of significant non-compliance were found.

Significant non-compliance

Both legislation and Standards for Professional Practice¹⁵ govern the planning, design, and construction of bridges on resource roads, with oversight typically provided by professional engineers and forest professionals. The *Forest Planning and Practice Regulations* (FPPR) sets out ten¹⁶ key requirements for resource road bridges and crossings on public land.

Between 2018 and 2022, the safety of bridges was the most common category of significant noncompliance found during Board audits. Nine significant non-compliances were reported, spanning nearly every licence type, from small woodlots to major forest licence holders. These varied in magnitude of risk, including:

- crossing a bridge with equipment that exceeded the posted load limits,
- having deficient guardrail anchor points,
- not installing a bridge in accordance with its design,
- improperly installing wood box culverts, and
- failing to ensure a crossing is free of structural defects or deficiencies.

Aside from findings, the Board has also made recommendations on this topic during this review period. In a 2021 audit of BCTS, the Board recommended addressing the complexity and systemic nature of a crossing-related finding.¹⁷ BCTS accepted that recommendation in full and began immediate implementation.¹⁸ Licensees resolved the issues identified for seven significant non-compliances before the audit reports were published. The resolutions included inspecting, repairing, or removing crossing or bridge structures.

¹⁴ Audit report ARC222

¹⁵ Professional Services in the Forest Sector: Crossings version 3. 2021. Joint Professional Practice Guidelines from the Joint Practice Board of the Association of British Columbia Forest Professionals (ABCFP) and Engineers and Geoscientists British Columbia (Engineers and Geoscientists BC).
¹⁶ Section 39 – natural surface drainage patterns must be maintained; Section 50 – protecting riparian management areas from road building; Section 55 – the stream channel and banks must be protected; Section 56 – fish passage must be maintained; Section 57 – activities must not harm fish or damage habitat; Section 72 – roads and bridges must be safe for industrial users; Section 73 – bridges must be designed to meet or exceed applicable standards; Section 74 – bridges must be designed to pass the highest expected peak flows; Section 75 – mandates fixing or managing bridge defects to ensure safety and protect downstream areas. Section 77 – certain records and as-built/record drawings must be retained.
¹⁷ Audit report ARC253

¹⁸ See <u>Response to Recommendations</u> for BCTS and TSLs- Skeena Business Area- Terrace Field Unit.

The FPPR restricts certain forest practices, such as road building in riparian management areas (RMA), to safeguard streamside vegetation along the riparian zones of streams, lakes, wetlands, and the adjacent upland ecosystems connected to these sensitive ecosystems. In 2022, northwest of Clearwater on tree farm licence 18, the Board found that Interfor Corporation excavated material within an RMA for road surfacing when installing a wood box culvert on a fish stream.¹⁹ The audit also discovered two undersized culverts installed that did not meet the necessary stream flow requirements. This resulted in the road surface scouring and sediment deposition into a nearby fish stream during the subsequent spring freshet. These events constituted two significant non-compliances related to the impact of crossings on fish habitat. When the report was published, Interfor had conducted a site review with the road construction contractor, provided training on stream crossing and environmental management, and had an engineer design a replacement open-bottom structure for installation.

Wildfire Act Requirements

Board auditors inspected 28 active cutblocks to evaluate compliance with fire preparedness requirements, reviewed wildfire hazard assessments for 427 cutblocks, and inspected 415 cutblocks for hazard abatement. There was 1 finding for every 40 cutblocks sampled. There were 18 areas requiring improvement and four findings of significant non-compliance.

The *Wildfire Act* requires those who carry out industrial activities to assess the fuel hazard and the associated risk of a fire starting or spreading. Fire hazard assessments analyze fuel hazards to determine predictable fire behaviour and ignition potential. The Board found 16 non-compliances due to licensees not complying with requirements to complete a hazard assessment. These non-compliances were reported as an area requiring improvement because, in most cases, the licensees abated the hazards. This issue was pervasive across licence types and tenure sizes throughout the Province. In addition to a bulletin on fire hazard assessments published in 2016,²⁰ the Board is conducting a special investigation²¹ to examine this issue more

closely, partly due to these audit findings.

Significant non-compliance

The *Wildfire Regulation* compels a person carrying out an industrial activity to be able to extinguish a fire if one starts. Fire preparedness means having adequate resources, trained personnel, proper equipment, and clear plans and protocols for effective fire detection and suppression. For 'high-risk activities' and open burning,



Figure 6. An auditor inspects a water storage unit used for fire suppression.

¹⁹ Audit report ARC258

²⁰ https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/bc-timber-sales/ems-sfm-certification/business-area/peaceliard/tpl_fire_hazard_assess_procedures_guidance_for_lpc.pdf

²¹ https://www.bcfpb.ca/wp-content/uploads/2022/10/2022-ToR-Wildfire-Risk-Reduction.pdf

the person must keep firefighting hand tools and an adequate fire suppression system on site. In 2019, in Quesnel²² and again in 2021 close to Terrace,²³ auditors identified two situations where timber sale licence holders were non-compliant: one lacked a water delivery system, and the other had inadequate fire preparedness despite carrying out high-risk activities. In Quesnel, the day following the field review by auditors, the TSL holder moved a water delivery system to the site. Fire preparedness is the legal obligation with the highest incident rate for findings, with one finding for every 14 active cutblocks sampled.

The *Wildfire Act* requires forest licensees to abate fire hazards within a specified period, generally by reducing the fuel hazard on the site of the industrial activity to ensure that the activity does not increase the risk of a fire starting or, if a fire were to start, would not increase the fire behaviour or fire suppression associated with the fire. Forest licensees have 24 to 30 months to abate a hazard.²⁴ The timeframe begins at the onset of harvesting and varies based on the proximity to a prescribed local government area. The Board generally audits during or shortly after harvesting. Consequently, licensees are typically in compliance by default during these audits, as they are still within the legally permitted window to fulfill abatement obligations. Nevertheless, some exceptions led to significant non-compliance.

In the Cheakamus Community Forest (CCF) in 2021²⁵ and at Woodlot W2001,²⁶ operated by Sage Mountain Resources Ltd., near Campbell River in 2022, licensees failed to abate slash piles within the prescribed timeframe, unduly elevating the wildfire risk. In the CCF, some slash piles were located within the Resort Municipality of Whistler (RMOW) boundaries, where municipal bylaws superseded some *Wildfire Act* sections. Following the discovery that RMOW bylaws lacked provisions for managing wildfire hazards post-harvest, the Board recommended an amendment. The RMOW subsequently revised the bylaw to include measures for timely and effective hazard abatement following industrial operations.²⁷ When the audit report was published, CCF burned and abated all ten slash piles. At the same time, Sage Mountain Resources installed barriers on the access roads and planned to carry out abatement measures when conditions were suitable.

Range

The Board undertook four range audits covering eight range agreements over the review period. Range agreement holders authorized to graze livestock or cut hay on public rangelands must operate according to a range use plan (RUP) and practice requirements under the *Range Planning and Practices Regulation* (RPPR). Range auditors reviewed legal documents and conducted field inspections to evaluate whether plans and practices complied. The Board reported four areas requiring improvement and two significant non-compliances.

²² Audit report ARC238

²³ Audit report ARC253

²⁴ Unless otherwise prescribed for a qualified holder by a professional (RPF or RFT) (section 12.1 of the *Wildfire Regulation*).

²⁵ Audit report ARC249

²⁶ Audit report ARC261

²⁷ See RMOWW <u>response to recommendation</u>

Significant non-compliance

The RPPR requires range agreement holders not to carry out a range practice that would result in a material adverse effect on the ability of riparian areas to withstand normal peak flow events, filter runoff, store and safely release water, and conserve wildlife habitat values. Similarly, the RPPR requires a range agreement holder to ensure the range activities do not harm or materially affect fish passage or destroy, damage or harmfully alter fish habitat. In 2021, 70 kilometres northwest of Quesnel on range tenure RAN077302,²⁸ the Board found that repeated heavy grazing over 1 kilometre of Newa Creek caused channel bank erosion and sediment deposits damaging or harmfully altering fish habitat. This significant non-compliance seemed to have been going on for many years without any enforcement action by government.

Under FRPA, range agreement holders must operate under an approved RUP or range stewardship plan. In 2021, about 30 kilometres south of Quesnel, on range tenure RAN076466,²⁹ the Board found the tenure holder was operating without an approved RUP. When the audit report was published, the range agreement holders submitted an RUP to the Ministry of Forests for approval.

Summary of Incident Rates

As discussed above, the Board regularly divides findings into activity categories and different legal obligations. Figure 7 summarizes these obligations for the review period, highlighting four key areas where licensees need improvement: hazard assessment, silviculture reporting, bridge and crossing construction, and fire preparedness.

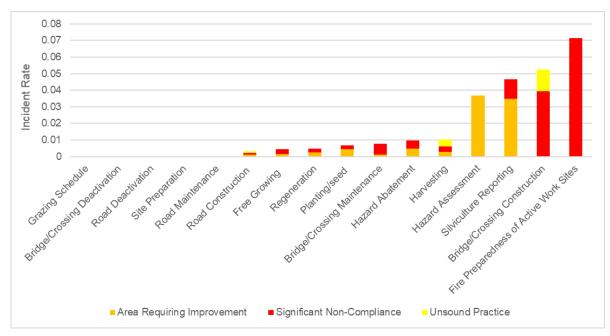


Figure 7. Incident rates by legal obligations audited. One finding in 10 samples would be an incident rate of 0.1.

²⁸ Audit report ARC251

²⁹ Audit report ARC252

CONCLUSIONS

The Board must undertake independent audits of forest and range practices annually. This special report summarizes 5 years and 43 audits from across BC. Between 2018 and 2022, Board auditors field reviewed 675 recently harvested cutblocks and 669 cutblocks declared freegrowing, inspected 1005 stream crossings, evaluated 1028 kilometres of road constructed or deactivated, and evaluated numerous other forest and range legal obligations across 20 natural resource districts. The Board reported 457 findings, with 86 percent in full compliance with the *Forest and Range Practices Act* and *Wildfire Act*.

Audits are an important part of continuous improvement and offer objective and critical feedback to promote sound forest and range practices and instill public confidence. While the consequences of the Board's non-compliance findings vary, all audit reports are available to the auditee and the public. Where applicable, findings are forwarded to government or professional associations for awareness and enforcement action. By the time audits were published, 30 percent of non-compliance findings had some form of resolution, with another 16 percent demonstrating licensee efforts toward resolution.

ACTIVITIES AUDITED IN THE FIELD - 2018-2022 --

CUTBLOCKS REVIEWED

- 675 recently harvested
- 669 declared free-growing
- **421** meeting regeneration milestones

INSPECTED

• 1005 stream crossings

EVALUATED

- **1028** km of road constructed or deactivated
- **numerous** other forest and range legal obligations

Recurring non-compliances demand improvement across all tenure types and sizes, with noncompliance reported in over 25 sections of the legislation. While woodlots had the lowest performance rating, with 7 percent of findings being non-compliant, this wasn't indicative of all small area-based licences. For example, community forest agreements had less than 1 percent of findings as non-compliant, which aligns with the average across all other licence types. Tree farm licences have the cleanest track record, with only 0.2 percent of findings as non-compliant. One of the most common non-compliances across all licence types and sizes involved failing to assess fire hazards as required by the *Wildfire Act*. Fire hazard assessments are a legal requirement for an industrial activity likely to increase fire risk within one kilometre of forest or grasslands. They are an important part of demonstrating due diligence. Licensees commonly do not complete these assessments, do not adequately assess risk, or do not complete them on time. The next most common finding of non-compliance across all tenure sizes was not adequately reporting silviculture obligations. Forest licensees must revise forest cover inventories after harvesting, submit reports on regeneration, confirm the status of free-growing stands, and record silvicultural activities on time.

ONE OF THE MOST COMMON NON-COMPLIANCES INVOLVES FAILING TO ASSESS FIRE HAZARDS AS REQUIRED BY THE *WILDFIRE ACT*.

Regarding the magnitude or scale of non-compliance consequences, fire preparedness was identified as the legal requirement that most frequently failed compliance checks per sampled active cutblock. However, the number of times licensees could not demonstrate sound and safe bridge crossings was equally significant. The Board found 11 examples of non-compliance associated with crossings, or 1 finding per 91 samples, which included not installing a bridge by its design or finding structural defects or deficiencies.

The Board will continue to report audit results to the public to improve forest and range practices in British Columbia.

APPENDIX 1: AUDIT REPORTS 2018-2022

YEAR	AUDIT REPORT
2018	ARC219-McLeod-Lake
	ARC221-Western-TFL39
	ARC222-Skeena-Sawmills
	ARC223-Adams-Lake
	ARC224-BCTS-Dawson-Creek
	ARC225-Rocky-Mtn-Range-RAN073763-RAN074477-RAN077890-RAN077784-RAN077893
	ARC226-BCTS-Castlegar
	ARC227-Small-Scale-Salvage-Cariboo-Chilcotin
	ARC228-W0604-W1780-W1781-W1950
	ARC229-W2101
2019	ARC230-PATH-TFL61
	ARC231-Saikuz-NRFL-A91154
	ARC232-NEWP-NRFL-A85566
	ARC233-Tolko
	ARC234-100-Mile-Dev-Corp
	ARC235-Clinton-CFA-K4F
	ARC236-Chilliwack-NRFLs
	ARC237-Cooper-Creek-Cedar
	ARC238-BCTS-Quesnel-NRD-Cariboo-Chilcotin
2020	ARC239-DM-Obligations-FSRs-CampbellRiver
	ARC240-DM-Obligations-FSRs-DawsonCreek
	ARC241-BCTS-Port-McNeill
	ARC243-BCTS-Burns-Lake
	ARC244-FSRs-Okanagan-Shuswap
2021	ARC245-Kalesnikoff
	ARC246-TAAN
	ARC247-Quesnel-RAN077219
	ARC248-Gitxsan
	ARC249-Cheakamus.pdf
	ARC250-BCTS-Revelstoke
	ARC251-Quesnel-Range-RAN077302-03
	ARC252-Quesnel-Range-RAN076466
	ARC253-BCTS-Terrace
	ARC254-CANFOR
2022	ARC255-BCTS-Cariboo-Chilcotin
	ARC257-Yucwmenlucwu
	ARC258-Interfor-TFL18
	ARC259-BCTS-Fort-St-James
	ARC260-Campbell-River-NRD-W0085
	ARC261-Campbell-River-NRD-W2001
	ARC262-Campbell-River-NRD-W2004
	ARC263-Campbell-River-NRD-W2044
	ARC264-Campbell-River-NRD-W2046



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