

# AUDIT OF FOREST PLANNING AND PRACTICES

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Canadian Forest Products Ltd.  
Forest Licence A19040  
Rocky Mountain Natural Resource District

APRIL 2025  
FPB/ARC/271



**Forest  
Practices  
Board**

BC'S INDEPENDENT  
WATCHDOG FOR  
SOUND FOREST &  
RANGE PRACTICES

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# Board Commentary

As part of its 2024 audit program, the Forest Practices Board carried out a full scope compliance audit of Forest Licence A19040, held by Canadian Forest Products Ltd. (Canfor), in the Rocky Mountain Natural Resource District near Cranbrook. This commentary highlights a notable practice implemented by Canfor, its diligence in managing its road network, and discusses Canfor's failure to abate some debris accumulations resulting from its harvesting operations. The audit report details these findings.

Canfor uses a predictive tool to model future impacts of forest diseases known as rusts. The tool is used in making regeneration decisions for species selection, prescribing planting densities and choosing silvicultural systems that mitigate forest health impacts under a changing climate model. The use of the tool helps promote the establishment of healthy, resilient forests after harvesting. The Forest Practices Board commends Canfor for this notable adaptive management approach.

Canfor managed an extensive network of forest roads and structures that presented planning and operational challenges. Unlike some recent audits that found deficiencies in construction, maintenance and documentation of roads and structures, Canfor met all of its legal and professional practice requirements. Canfor's success in this regard is commendable.

The audit found that Canfor did not meet abatement requirements on 2 of the 21 cutblocks audited. One of the unabated cutblocks is located near the community of Kimberley. Post-harvest debris accumulations were located in an area where there is public use for recreation and other pursuits, increasing the risk of a human-caused fire. The Board has noted previously<sup>1</sup> that failure to abate wildfire hazards near communities can put public and private resources at significant risk. Licensees that create hazards in these situations must be diligent in abating fire hazards.

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<sup>1</sup> [Cheakamus Community Forest Limited Partnership - CFA K3V](#)

# 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 forest industry practices to determine compliance with the *Forest and Range Practices Act* (FRPA) and the *Wildfire Act*.

As part of its 2024 compliance audit program, the Board randomly selected the Rocky Mountain Natural Resource District as the location for a full-scope compliance audit. Within the district, the Board selected Canadian Forest Products Ltd.'s (Canfor) forest licence (FL) A19040 for audit.

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.** Riparian area and mid-slope salvage of burned timber in the Elk River Valley.

## Background

FL A19040 is a volume-based forest tenure, with operations located in the east Kootenay area. Canfor manages its operations from its office in Cranbrook, where staff plan and implement forestry activities including timber harvesting, road work and silviculture. Activities subject to audit are spread throughout the Cranbrook Timber Supply Area (TSA), near the communities of Cranbrook, Wasa, Kimberley, Sparwood, and Elkford (see Figure 2 for a map of the audit area).

FL A19040 has an allowable annual cut of 213 361 cubic metres. Canfor harvested about 520 000 cubic metres of timber during the one-year audit period.<sup>2</sup>

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<sup>2</sup> While this level of harvest is higher than the allowable annual cut, Canfor is permitted to harvest all of its five-year cut control cycle (1 066 805 cubic metres) in just one or two years. During the audit period, most of the harvest was focused on salvaging fire-damaged timber.

This audit took place within the territories of the Adams Lake Indian Band, Neskonlith Indian Band, Shuswap Band, Yaqan nu?kiy, Yaqit ?a·knuql?i 'it First Nation, ?akisqnuq First Nation, ?aqam, and Skwl?ax te Secwepemc?ulecw. The Board recognizes First Nations' deep connection with the land that continues to this day.

The Cranbrook TSA is characterized by diverse landscapes that provide for a wide range of wildlife species, including caribou, elk, grizzly bear and mountain goat. The area's lakes, rivers, scenic mountains and parks offer opportunities for recreation and tourism. These include Lake Koochanusa, the Columbia and Elk rivers, the Gilnockie, Elk Lakes, and Top of the World provincial park, as well as part of the Purcell Wilderness Conservancy Park. Other resource values include community watersheds, scenic areas and old-growth forests for which the *Kootenay-Boundary Higher Level Plan Order* (Oct 2002) (KBHLPO) established objectives. Forest licensees must address these objectives in operational plans.

Canfor's operations range from low to high-elevation areas with a range of moist to dry climates characterized by distinct environmental features that contribute to the area's ecological complexity, with frequent stand-initiating events such as fires, wind and insects. The area's forests consist of a natural mosaic of mostly even-aged stands made up of lodgepole pine, Douglas fir, western larch, spruce and balsam. Potentially unstable terrain is common in the mountainous areas. This may require terrain stability assessments and precautionary measures to address terrain stability when harvesting timber and maintaining and building roads.

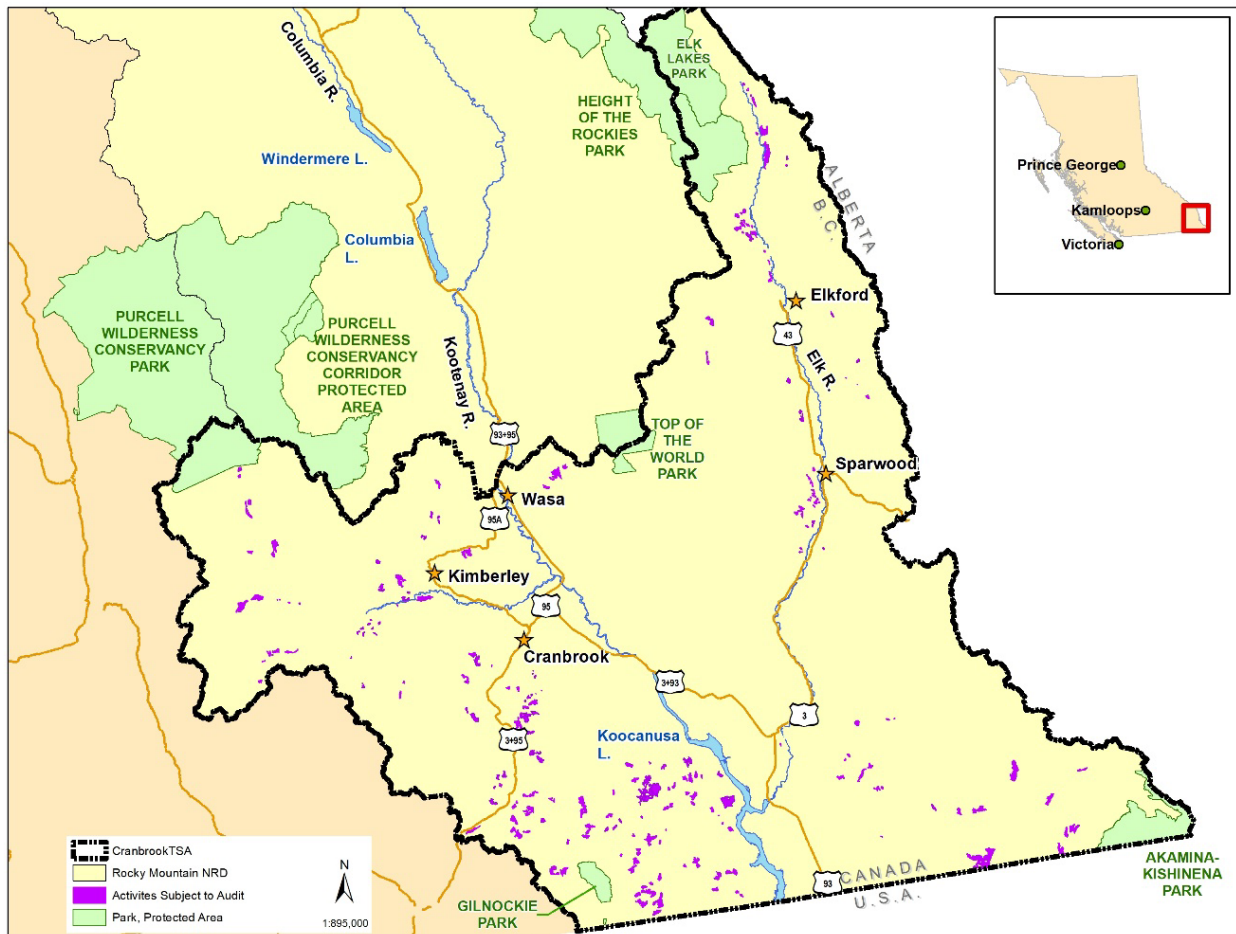


Figure 2. Map of the Audit Area

## Audit Approach and Scope

This was a full-scope compliance audit. All activities and associated planning carried out between September 1, 2023, and September 27, 2024, were eligible for audit. This included operational planning (forest stewardship plan (FSP)<sup>i</sup> and site plans), timber harvesting, wildfire protection, silviculture, and construction and maintenance of roads and major structures.<sup>3</sup>

Auditors assessed these activities for compliance with FRPA, the *Wildfire Act*, and applicable regulations. This work included interviewing Canfor staff, reviewing the FSPs and site plans, examining records, and visiting sites to review field practices. The audit team was comprised of forest professionals, an agrologist and a geoscientist, who were in the field with licensee representatives from September 22 to 27, 2024.

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

### Operational Planning

Two FSPs were in effect during the audit period—FSP 17<sup>ii</sup> and FSP 985.<sup>iii</sup> FSP 985 replaced FSP 17 on June 14, 2024. The planning for all cutblocks harvested during the audit period fell under FSP 17. The FSPs cover the Selkirk and Rocky Mountain Natural Resource Districts. Audit activities in the Cranbrook TSA were in Forest Development Units 2 and 3<sup>4</sup> in FSP 17.

Canfor's operations fall within the area covered by the KBHLPO and are subject to the objectives in the order. Specific objectives that apply to Canfor's operations include those for:

- Scenic areas
- Biodiversity
- Old growth
- Green-up of reforested areas
- Grizzly bear habitat
- Consumptive streams
- Enhanced resource development zones
- Fire-maintained ecosystems

Other legal orders established under the *Government Actions Regulation* that apply to Canfor's operations include those for ungulate winter range (moose, caribou, deer, elk and mountain goat), as well as Section 7 notices for numerous wildlife species. FSPs 17 and 985 link the relevant aspects of the orders and notices to Canfor's operations.

Auditors examined the FSPs and stand-level site plans for consistency with legal requirements. During harvesting, road and silviculture field sampling, auditors also confirmed whether site plans accurately identified conditions on the ground.

The key values associated with activities that took place during the audit period are riparian, visuals, wildlife habitat, soils (terrain stability), recreation, cultural sites and range.

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<sup>3</sup> Major structures include bridges and major culverts. Bridge means a temporary or permanent crossing structure with a span length equal to or greater than 6 metres or an abutment height of 4 metres or greater. A major culvert has a pipe diameter of 2 metres or greater or is an open bottom arch with a span greater than 2.13 metres.

<sup>4</sup> A forest development unit (FDU) means an area identified in a FSP where forest development may occur during the term of the plan, and within which, during the term of the plan, timber to be harvested or roads to be constructed are entirely located. An FDU may have a unique set of situations or circumstances where certain steps or practices are required to meet results, strategies or resource objectives. Note that FDU 3 was renamed to FDU 4 in FSP 985.

## Timber Harvesting

Canfor harvested 90 cutblocks during the audit period, and auditors examined 39 of them.

Auditors risk-rated the cutblocks based on their proximity to key resource values and chose a sample that included different forest values and geographic areas within the operating area.

## Road and Bridge Construction, Maintenance and Deactivation

Canfor constructed, maintained and deactivated roads and structures during the audit period. The population and sample of road and bridge activities are shown in Table 1.

TABLE 1. Population and Sample for Road and Bridge Activities

ACTIVITY	POPULATION	SAMPLE
	(Kilometres)	(Kilometres)
Road Construction	32.0	10.4
Road Maintenance	4674.6	824.7
Road Deactivation	46.8	6.4
	(Structures)	(Structures)
Bridge & Major Culvert Constructed	2	2
Bridge & Major Culvert Maintained	100	45
Bridge & Major Culvert Deactivated	4	2

## Silviculture Obligations and Activities

Canfor conducted site preparation, planting, brushing and invasive plant treatment activities, and had regeneration and free-growing obligations during the audit period. The population and sample of silviculture obligations and activities are shown in Table 2.

TABLE 2. Population and Sample for Silviculture Activities and Obligations

ACTIVITIES AND OBLIGATIONS	POPULATION	SAMPLE
	(Cutblocks)	(Cutblocks)*
Site Preparation	2	2
Planting	83	15 – field 29 – seed transfer**
Regeneration (due or declared)	75	14
Brushing	4	4
Invasive Plant Treatment	8	2
Free-growing (due or declared)	113	36

\*Auditors checked all field-sampled cutblocks for annual reporting compliance.

\*\*Auditors checked planting records to determine whether the seedlings planted conform to the *Chief Forester's Standards for Seed Use*.

## Wildfire Protection

Fire hazard assessments were due on 72 cutblocks, and hazard abatement was completed or partially completed on 41 cutblocks during the audit period. Canfor was active at two logging sites during the field audit. Auditors examined the fire hazard assessments for 41 cutblocks and abatement practices on 21 cutblocks. Auditors examined both active sites for fire preparedness.

## Findings

The audit found that Canfor's planning and practices generally complied with FRPA and the *Wildfire Act* as of September 2024, with the exception of the fire hazard assessment and abatement finding described below. The audit also found a notable practice, as described in the *Predictive Pine Rust Tool* section below.

### Notable Practices

#### Predictive Pine Rust Tool

In demonstrating a commitment to improved practices, Canfor developed an innovative approach to managing forest health in its regenerating stands. Partnering with researchers, they co-developed a predictive pine rust tool to model future impacts of forest health beyond free-growing declarations. Using current silviculture survey information, Canfor is able to project impacts to pine stands and use this as a basis for silviculture treatments that may be necessary to offset future forest health risks. This is a

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*A notable practice is a common practice of the auditee that generally has a positive social or environmental effect and goes beyond compliance with legislation and industry standard practice. It is a practice that, if conducted by other licensees, could improve forest and range practices within the province.*

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meaningful step in satisfying section 107(5)<sup>iv</sup> of FRPA and section 97(6)<sup>v</sup> of the *Forest Planning and Practices Regulation*, which requires a person making a free-growing declaration to ensure a stand meets free-growing criteria for the required period following the declaration.

More importantly, using this tool is a key step that allows Canfor to better understand forest health risks, learn from prior management decisions and act to inform current practices. This information can be used in making regeneration decisions for species selection, prescribing planting densities and choosing silvicultural systems that could mitigate forest health impacts under a changing climate model. This is a notable adaptive management approach. It values the future health and resiliency of stands beyond the legal free-growing requirement and helps Canfor ensure its regenerating forests contribute to non-timber values, as well as support future timber supply.

### Non-Compliance Findings

#### Fire Hazard Assessment and Abatement

Sections 7(1) and (2)<sup>vi</sup> of the *Wildfire Act* require persons carrying out an industrial activity to conduct fire hazard assessments and abatement at prescribed intervals. Sections 11(3.1)(a) and 12.1(2)(b)<sup>vii</sup> of the *Wildfire Regulation* set out the intervals licensees are required to assess and abate a fire hazard when carrying out an industrial activity, like timber harvesting. The assessment must include a measure of the fuel hazard and the risk of starting or spreading fire. The abatement must reduce the fuel hazard to a level that does not increase the risk of a fire starting on the site and would not increase the fire behavior or fire suppression associated with the fire, should one start.



Auditors found that Canfor did not assess fire hazards within the required intervals for 14 of 41 cutblocks sampled. As well, Canfor did not abate fire hazards within the required intervals for 2 of 21 cutblocks sampled. Therefore, Canfor did not comply with legislation.

Canfor was required to complete interim hazard assessments at prescribed intervals during harvesting and also at the completion of harvesting. Canfor did not complete interim hazard assessments for eight cutblocks, some of which were harvested over two years. It also did not complete hazard assessments on time for eight cutblocks at harvest completion, some of which were four months overdue.

One of the unabated cutblocks is located in a severe-risk<sup>5</sup> area near the community of Kimberley. The risk of human-caused ignition in this area was considerable, and several forest and human values were present. These values included timber, ungulate winter range, old growth, fish habitat, a consumptive water intake, recreation sites and trails, visual quality, forage, soils (terrain stability), and the Kimberley Alpine Resort.

Canfor was not diligent in assessing and abating the hazards and placed human and forest values at unnecessary risk. These non-compliances are considered significant.

Subsequent to the audit, Canfor stated it is developing several actions to address the fire hazard assessment issues, such as completing the overdue assessments as soon as possible, updating its fire hazard assessment procedures and communicating them across all Canfor operations in British Columbia. In addition, Canfor fulfilled its outstanding abatement obligations.

## General Findings

### Operational Planning

The FSPs were consistent with legal requirements, including objectives set out in applicable government orders. Site plans were consistent with the FSP. Canfor addressed site-specific resources in the site plans by accurately identifying resources and prescribing practices consistent with FSP results and strategies. Resource features associated with harvesting activities commonly included streams and wetlands, wildlife habitat, coarse woody debris, terrain stability, and scenic values.

Auditors had no concerns with operational planning.

### Timber Harvesting

Auditors sampled 39 cutblocks, which provided geographic coverage of the audit area. The sampled cutblocks covered the range of key resource values specific to Canfor's operating area and included steep slope, fire salvage, partial cut and clearcut harvesting practices.

The harvesting sample included management strategies for terrain stability, consumptive water use, archaeological features, range use, recreation use, wildfire risk reduction, pest reduction, scenic areas, and wildlife.

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<sup>5</sup> Severe-risk as it relates to hazard abatement identified in the *Wildfire Management Branch Guide to Fuel Hazard Assessment and Abatement in British Columbia*, April 2012.

Canfor completed assessments to identify potential archaeological, terrain, visual, hydrological and range impacts. Where applicable, Canfor followed the practice recommendations in these assessments during harvesting, or cutblocks were modified to reduce risk or impact to these values.

During the audit period, Canfor harvested 27 cutblocks that were located within designated scenic areas, where harvesting may be visible and where government set visual quality objectives regarding cutblock scale, shape and appearance.

Auditors examined nine of these cutblocks during the field audit and found Canfor had completed visual impact assessments for all of them. Auditors also found that the cutblocks were either not visible from a significant public viewpoint or met the visual quality objectives.

Primary wildlife considerations related to the audit activities were for grizzly bears, Williamson's sapsucker and ungulate winter range, including moose, caribou and mountain goat. Canfor accurately identified the habitat potential associated with the sampled cutblocks and adjusted operating periods and practices to meet general wildlife measures.

In summary, auditors found that harvesting was conducted in accordance with the requirements of legislation, the FSPs and site plans.

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

Road construction, maintenance and deactivation were consistent with legal requirements, and Canfor kept detailed and accurate records for these activities. Auditors had no concerns with construction, maintenance and deactivation practices.

#### ***Road Construction***

Road construction was well done. Auditors found that Canfor usually builds its roads a year or more ahead of timber harvesting to allow time for the roads to set up and improve their stability for industrial use. Canfor maintained natural drainage patterns, and the roads were stable.

Canfor completed road site plans for all of the roads audited. Road construction conformed to the site plans.

#### ***Road Maintenance***

Canfor's road maintenance obligations exceeded 4600 kilometres, most of which were wilderness roads. This population is substantial and presents a significant challenge to manage.

Roads were mostly located on middle- to lower-slopes of valleys with predominantly coarse-textured soils. Canfor employed road construction techniques that have been proven to stand up over time in these environments. Drainage systems were functional, and natural drainage patterns were maintained. No significant instances of instability or surface erosion were observed by the auditors, and no discernible or tangible impacts on forest values were noted.

Overall, Canfor demonstrated it had included adequate controls in its road management system and effectively monitored and maintained its roads.



**Figure 3.** A cattle fence that was protected during harvesting activities.

### *Road Deactivation and Rehabilitation*

Both rehabilitation and deactivation work were well done, with Canfor removing drainage structures, cross-ditching, recontouring, grass seeding, and restricting access. No instability or adverse impacts on forest resources were observed.

### *Structure Construction*

Canfor constructed two bridges during the audit period. The bridges were well constructed, all documentation was clear and complete, and the installation matched the record drawings.

### *Structure Maintenance*

There were no concerns with Canfor's maintenance of the 45 sampled structures. Those that were used for industrial purposes during the audit period were sound and safe, and none of the structures impacted streams or riparian areas.

### *Structure Deactivation*

Structure removal was well done for the two structures Canfor deactivated. No adverse impacts to the stream channel and banks were noted.

### **Silviculture**

Canfor effectively established healthy, new stands by planning for natural regeneration or directly planting its cutblocks promptly following harvest. Appropriate mixtures of species, including Douglas-fir, western larch, spruce and ponderosa pine were planted, monitored for survival, and maintained across the free-growing period. In many cases, planting densities were prescribed above the target stocking standard to mitigate losses due to forest health factors, including *Armillaria* root rot, western gall rust, animal damage and drought.

Canfor generally conformed with the *Chief Forester's Standards for Seed Use* to meet its legislated requirements under FRPA. As well, it adhered to its commitments under its FSP to employ climate change adaptation strategies for species selection. Canfor also demonstrated its commitment to reducing the wildfire risk in wildland urban interface<sup>6</sup> areas through the appropriate use of partial cutting and fire management stocking standards.



**Figure 4.** A road deactivated by blocking access, ripping the running surface and grass seeding to minimize surface erosion.



**Figure 5.** A tree planted next to a stump to provide shade and reduce the risk of cattle damage.

<sup>6</sup> An area where human development meets or is intermingled with forest and grassland fuel types.

Canfor implemented a structured survey regime to identify any risks associated with its regenerating stands, scheduled necessary silviculture treatments and collected and reported appropriate silviculture information to support its free-growing declarations. These surveys provided accurate forest cover information, including the reporting of mature dispersed tree retention, which was submitted to government databases in a timely manner to meet its annual reporting requirements.

In general, auditors found that Canfor met its regeneration delay and free-growing obligations with respect to legislative requirements and the commitments made in its FSP.

Canfor submitted annual reports to the government as required.

Auditors had no concerns with Canfor's silviculture practices and obligations.

### Wildfire Protection

Other than the findings described in the *Fire Hazard Assessment and Abatement* section of this report, auditors had no concerns with Canfor's wildfire protection practices and had the following observations.

#### *Fire Hazard Assessment*

Canfor completed fire hazard assessments within the required time frames for 27 of 41 cutblocks sampled. As required, it assessed the fuel hazard and the risk of a fire starting or spreading as a result of timber harvesting in each of these assessments.

#### *Fire Hazard Abatement*

Canfor routinely burned roadside slash piles within the required time frames.

The auditor's field inspections revealed that in-block slash loading was below abatement thresholds<sup>7</sup> and no further treatment was required. Roadside slash was generally piled in safe locations and burned within the required period without damaging adjacent timber or other forest resources.



**Figure 6.** Hand piling of slash to reduce the fire hazard next to a residential area.

Canfor had an aggressive fuel management strategy that included fuel modification when operating next to residential areas. This reduced the risk of a fire starting and reduced the fire behavior or suppression effort, should a fire start, serving to protect adjacent properties.

#### *Fire Preparedness*

The logging contractor on the two active sites sampled had sufficient fire tools and fire suppression systems. The contractor monitored the fire danger rating<sup>8</sup> so it could adjust the timing of its activities to meet operational restrictions if required.

<sup>7</sup> Abatement thresholds are identified in Canfor's fire hazard assessments and by auditors using the *Wildfire Management Branch Guide to Fuel Hazard Assessment and Abatement in British Columbia*, April 2012.

<sup>8</sup> Fire danger rating is a measure of the risk of wildfire starting. Ratings range from low to extreme. Operational restrictions are introduced as the rating and its duration increase, and can include requirements for fire watchpersons, fire suppression systems and shut-downs.

# Audit Opinion

In my opinion, the operational planning, timber harvesting, road and major structure construction and maintenance, silviculture and fire protection activities carried out by Canadian Forest Products Ltd. on Forest Licence A19040 between September 1, 2023, and September 27, 2024, complied in all significant respects with the requirements of the *Forest and Range Practices Act*, the *Wildfire Act* and related regulations, as of September, 2024.

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 further qualifying my opinion, I draw attention to the *Fire Hazard Assessment and Abatement* section of this report, which describes a significant non-compliance.

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, 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*.



Jody Stump, RPF, PAG  
Auditor of Record

Malakwa, British Columbia  
April 2, 2025

# 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 2 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.



## ENDNOTES

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<sup>i</sup> 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 its FSP, the licensee is 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.

<sup>ii</sup> Canfor's 2018 Forest Stewardship Plan for Tree Farm License 14 Forest License A19040 Forest License A18978 Forest License A18979 Forest License A78604 Forest License A90310 Forest License A91306 Forest License A91307 Forest License A94545 Community Forest Pilot Agreement K1W in the Rocky Mountain Forest District and Forest License A20212 Forest License A20214 Forest License A91309 Forest License A94264 in the Kootenay Lake TSA

<sup>iii</sup> Canfor's 2023 Forest Stewardship Plan for Tree Farm License 14 Forest License A19040 Forest License A18978 Forest License A18979 Forest License A78604 Forest License A91306 Forest License A91307 Forest License A94545 Community Forest Pilot Agreement K1W in the Rocky Mountain Forest District and Forest License A20212 Forest License A20214 Forest License A91309 Forest License A93497 Forest License A94264 in the Kootenay Lake TSA

### <sup>iv</sup> **Limitation on liability of persons to government**

107 (5) The minister must not give written notice under subsection (4) of an order to the effect that an obligation in respect of establishing a free growing stand on an area has not been fulfilled unless the minister has determined that

- (a) a free growing stand has not been established, or
- (b) a free growing stand has been established and the following circumstances apply:
  - (i) at the time the declaration was made, the stand was under threat from
    - (A) competing plants, shrubs or other trees established on the area, or
    - (B) factors adverse to forest health in the area;
  - (ii) as a result of the threats referred to in subparagraph (i), the stand is unlikely to remain a free growing stand without further treatment.

### <sup>v</sup> **Declarations of agreement holders and others as to fulfillment of obligations**

97 (6) A stand on an area that is the subject of a written declaration under section 107 of the Act is not free growing on the date of the declaration, if

- (a) it is more likely than not that 20 years after the applicable commencement date, the stand
  - (i) will not conform to the applicable stocking standards, or
  - (ii) will be impeded in its growth because of adverse effects on the area because of the effect on the area of forest health factors or competition from plants, shrubs or other trees, or
- (b) it is more likely than not that 5 years after completion of the last of the brushing or spacing treatments on the stand that were carried out more than 15 years after the applicable commencement date the stand
  - (i) will not conform to the applicable stocking standards, or
  - (ii) will be impeded in its growth by competition from plants, shrubs or other trees because those treatments were ineffective or had an adverse effect on the stand.

### <sup>vi</sup> **Hazard assessment and abatement**

7 (1) In prescribed circumstances and at prescribed intervals, a person carrying out an industrial activity or a prescribed activity on forest land or grass land or within 1 km of forest land or grass land must conduct fire hazard assessments.

(2) A person, other than a person who is in a prescribed class of persons referred to in subsection (2.1), carrying out an industrial activity or a prescribed activity, must, within a prescribed time period and to the prescribed extent, abate a fire hazard of which the person is aware or ought reasonably to be aware.

## **Wildfire Regulation**

### <sup>vii</sup> **Hazard assessment**

11 (1) For the purposes of section 7 of the Act,

- (a) each of the following is a prescribed activity under subsections (1) and (2) of that section:
  - (i) operating a waste disposal site;
  - (ii) operating a dry land sort;
  - (iii) operating a camp associated with an industrial activity, and
- (b) each of the following is a prescribed circumstance under subsection (1) of that section:
  - (i) an industrial activity or an activity prescribed under paragraph (a) of subsection (1) creates or increases a fire hazard or is likely to do so;
  - (ii) an official notifies a person carrying out an industrial activity or an activity prescribed under paragraph (a) of subsection (1) that a fire hazard exists at the site of the activity or operation.

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(2) Subject to subsection (3.1) of this section, the prescribed intervals, at which persons described in section 7 (1) of the Act must conduct fire hazard assessments, are

- (a) 3-month intervals during the period in which the persons are carrying on the industrial activity or the prescribed activity in an area inside, or within 2 km of, the boundaries of
  - (i) a local government under paragraphs (d) to (f) of the definition of "local government" in section 1 of the Act, or
  - (ii) a fire protection district in a regional district, and
- (b) the shorter interval between the most recent 3-month interval and the date on which the activity ceases for an expected period of 3 months or more.

(3) Subject to subsection (3.1) of this section, the prescribed intervals, at which persons described in section 7 (1) of the Act must conduct fire hazard assessments, are

- (a) 6-month intervals during the period during which the persons, in any area other than the area described in subsection (2), are carrying on the industrial activity or the prescribed activity, and
- (b) the shorter interval between the most recent 6-month interval and the date on which the activity ceases for an expected period of 6 months or more.

(3.1) The prescribed intervals, at which a person described in section 7 (1) of the Act who is a qualified holder must conduct fire hazard assessments, are the intervals

- (a) set out in subsection (2) or (3) of this section, as applicable, or
- (b) specified by a professional forester or a registered forest technologist.

#### **Hazard abatement: qualified holders**

12.1 (1) In this section, "abatement area" means each area within which the industrial activity or prescribed activity takes place in each consecutive 12-month period that occurs after the date the activity begins.

(2) The following periods are prescribed as the periods in which a person described in section 7 (2) of the Act who is a qualified holder must abate fire hazards of which the person is aware or ought reasonably to be aware:

- (a) for each abatement area within an area described in section 11 (2) (a) of this regulation, a period of 24 months, beginning on the date the industrial activity or prescribed activity begins in the abatement area,
- (b) for each abatement area within an area other than an area described in section 11 (2) (a) of this regulation,
  - (i) a period of 30 months, beginning on the date the industrial activity or prescribed activity begins in the abatement area, or
  - (ii) the period specified by a professional forester or registered forest technologist.

(3) A person required to abate a fire hazard under section 7 (2) of the Act who is a qualified holder must reduce the fuel hazard on the site of the industrial activity or prescribed activity

- (a) as necessary to ensure that carrying out the activity
  - (i) does not increase the risk of a fire starting on the site, and
  - (ii) if a fire were to start, would not increase the fire behaviour or fire suppression associated with the fire, or
- (b) as specified by a professional forester or registered forest technologist.



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