



Interim Permit Reporting Policy

Updated: July 19, 2024

This operational policy supplements the [BC Archaeological Impact Assessment Guidelines](#)¹ (AIA Guidelines) and the [Site Form and Mapping Requirements](#).² It replaces previous versions of this policy and Bulletin 10: Revised Interim Permit Reporting Procedures (2004).

1. Purpose

This document describes interim reporting requirements for assessments conducted under the authority of *Heritage Conservation Act* (HCA) permits, as administered by the Archaeology Branch (the Branch). The BC Energy Regulator (BCER) may apply portions of this policy to their process.

2. Background

Interim reports are used to provide brief reports of archaeological studies on an assessment-by-assessment basis (e.g., by forestry cutblock), or where timely management recommendations are required prior to the expiration of a permit. They are most often used for [Multi-Assessment Permits \(MAPs\)](#)³ and may be a requirement for multi-year assessments. Other studies may benefit from this approach, (e.g., to support HCA s. 12.4 alteration permit applications where sites have been identified and development cannot avoid impacts).

In 2015, the Branch trialed an interim report template. Following feedback, the template was not adopted and is no longer supported by the Branch.

While an archaeologist may provide management *recommendations*, the Archaeology Branch provides the proponent with management *directions*, which

¹ https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/natural-resource-use/archaeology/forms-publications/archaeological_impact_assessment_guidelines.pdf

² <https://www2.gov.bc.ca/gov/content/industry/natural-resource-use/archaeology/guides-templates>.

³ HCA permits issued and/or administered by the BCER are not subject to the Multi-Assessment Permit Policy. https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/natural-resource-use/archaeology/forms-publications/multi_assessment_permit_policy.pdf

are required actions. In the event of a disagreement, management directions from the Branch prevail.

3. Authority

A permit issued under the HCA may include requirements, specifications, and conditions that the Statutory Decision Maker considers appropriate, including requiring the permit holder to provide satisfactory reports of the results of archaeological assessments.

The BCER has authority under the *Energy Resource Activities Act* to issue HCA permits.

4. Interim Report Requirements

Appendix A of the [AIA Guidelines](#) provides detailed guidance on report content.

Following discussion with the regulator, interim reports may include the assessment results for multiple developments (e.g., several cutblocks).

Branch staff may direct permit holders to submit interim reports in other formats, to support the administration of emergent situations, major projects, or other specific circumstances (e.g., email summaries in response to provincial emergencies; tabular data for small assessment areas).

A. Mandatory Front-Page Content

The following information will be provided on the first page of each interim report. If spacing is an issue, this information may continue onto subsequent pages.

- 1) Permit number(s)
- 2) Interim report number
 - a) This is based on the HCA permit number, a unique identifier, and the version number (e.g., 2023-0123-01 Rev2).
 - b) The Branch recommends a coordinated numbering system for interim reports and Notices of Intent (NoIs). The content and distribution of NoIs are described in the MAP Policy.
- 3) Descriptive interim report title that references the project component(s) being assessed (e.g., Archaeological Interim FLA19832, CP330, for ABC Forestry Company)

- 4) List of Borden numbers for sites subject to automatic protection under the HCA located within the assessment area
 - a) Authors are encouraged to include a list of other cultural and heritage sites of interest to First Nations. Sites not subject to automatic protection under the HCA may fall under the jurisdiction of other agencies (e.g., Environmental Assessment Office, Forest and Range Evaluation Program). Identifying these sites will support good land-use decisions. The report will distinguish which sites are protected and under which statute.
- 5) Additional relevant administrative tracking numbers (e.g., BCER reference number, First Nation file numbers)
- 6) Name and contact information for:
 - a) Permit holder
 - b) Proponent
 - c) Provincial regulator (i.e., Permitting Archaeologist) – please use general contact information for the Archaeology Branch:
 1. Telephone: 250-953-3334
 2. archpermitapp@gov.bc.ca
- 7) Brief description of the development, including size and location, and proposed schedule of activities
- 8) Distribution list

B. Management Summary

The management summary begins on the first page of the report and describes the key results and recommendations of the assessment. Consider that this section may be the only part some audiences will read.

The management summary must remind the reader that all archaeological sites, whether recorded or as-yet unidentified, on private and public land, intact or disturbed, are protected by legislation and may not be altered, damaged, moved, excavated in, or disturbed in any way without a permit issued under the HCA, and that if unanticipated archaeological resources are found, the proponent/developer must stop work immediately and contact the Branch and/or BCER as applicable for further direction.

C. Summary of Pre-Field Tasks

Under the provisions of the MAP Policy, NoIs may be required. Permit holders are responsible to track when NoIs were distributed, and how any comments received

from First Nations were addressed, including whether in-field decisions were affected.

Reports will describe:

- Research to review nearby recorded sites and relevant previous studies
- Pre-field engagement with First Nations (e.g., NoIs)
- How the pre-field tasks influenced the field director's areas of focus and archaeological methods during fieldwork
- How First Nations' comments influenced the assessment and/or recommendations

This section should be restricted to how pre-field tasks affected decisions related to each specific assessment. A more detailed discussion regarding pre-field tasks can be provided in the final permit report.

D. In-Field Archaeological Methods

The interim report will provide preliminary results to describe how the assessment was conducted and what was observed, including:

- Date(s) of the assessment
- List of participants, including their role and affiliation, by date
 - Indicate when the field director was present
 - Indicate when an archaeologist was acting as a field supervisor, to gain experience within the culture area for future field director applications

The terms and conditions of HCA permits require the permit holder to report the rationale for in-field decisions, including:

- Survey coverage
- How observations (e.g., biophysical characteristics, proximity to cultural resources) influenced the assessment of archaeological potential
- And, as appropriate:
 - Strategy for subsurface testing
 - Why and how machine-assisted inspections were conducted
 - Strategy for sampling culturally modified trees (CMTs)
 - How sites were evaluated and assessed

The text and maps of interim reports will describe where pedestrian survey and subsurface testing took place. Maps and spatial files will comply with the Branch's requirements and permit conditions (e.g., spatial data for Subsurface Test Areas (STAs) and Areas of Potential (AOPs) will be provided to the Branch).

E. Assessment Results

The results section will describe:

- 1) Areas assessed as having low archaeological potential
 - a) The rationale for determining potential will be provided, referencing the criteria outlined in the permit application.
- 2) Areas assessed as having potential for archaeological sites, including those subjected to subsurface testing or identified as AOPs requiring further assessment
 - a) The rationale for determining potential will be provided.
 - b) Given that the Branch recommends AIAs fully assess proposed developments, the report will explain why any AOPs were not fully assessed (e.g., AOPs located immediately adjacent to the development, or encountered *en route* to the assessment area).
- 3) Sites subject to protection including a description of type, location, and dimensions
 - a) Sites will be identified by Borden number, unless otherwise directed by the Branch – **temporary numbers will not be accepted** without explicit approval from the regulator (e.g., emergency situations).
 - b) When available, provide a summary of artifacts observed and collected, known accession numbers, specified repository, samples collected, and analysis results, understanding this may change in the final report following all analysis.
- 4) Site revisits, including observed changes from previous assessments (e.g., the western boundary was refined, or the feature previously described as a tree throw was confirmed to be a cache pit)
 - a) Even if no changes to the site were observed, photographs are encouraged to support the site record, to demonstrate status over time
- 5) It is recommended that HCA reports also describe cultural sites not subject to automatic protection under the HCA, to support good land-use decisions and ensure compliance for other agencies

- a) Some site types (e.g., trails) require confirmation of protection status from the Branch.
- b) When sites are not recommended for automatic protection under the HCA, they will be described in sufficient detail to support the recommendation (e.g., historic trail related to Gold Rush activities).

While Appendices D, E, and F of the AIA Guidelines outline the requirements for significance and impact assessments, First Nations may have their own criteria to assess significance.

F. Evaluation of Research

While the final report will provide a more robust evaluation of research, it is expected that interim reports will include preliminary evaluation of:

- Effectiveness of in-field decisions (e.g., subsurface testing, CMT sampling)
- Effectiveness of any Archaeological Overview Assessments (AOAs) that influenced the study
- Accuracy of the data in the Provincial Heritage Register (e.g., whether sites were misrepresented or misplotted)

G. Impact Assessment

Further to Appendix A of the AIA Guidelines, describe and assess the direct and indirect impacts from the proposed development on archaeological site(s) and/or AOPs requiring further assessment.

H. Management Recommendations

Management recommendations advise the proponent as to next steps regarding further archaeological work, project redesign, and/or requirements for any additional HCA permits. Per section 3.6 of the AIA Guidelines, management recommendations **must incorporate recommendations specific to the development**, including recommendations for further work, avoidance of sites or areas of potential, and a recognition that any sites protected under the HCA can only be altered under the authority of a permit.

The Branch does not endorse development proceeding under a Chance Finds Procedure, save when an archaeological assessment was sufficiently thorough, and/or the proposed development poses a low risk of impacts to unrecorded sites.

The management of sites not automatically protected under the HCA, such as cultural heritage resource sites as defined by the *Forest and Range Practices Act* (FRPA), may be addressed as management recommendations.

Any changes to the development may render these recommendations null (e.g., to go from slab on grade construction within imported fill to excavations).

Management Recommendations must always direct the developer to contact the Archaeology Branch (or, as applicable, BCER) in the event they encounter unanticipated archaeological remains.

I. Grant of License

Materials submitted to the Archaeology Branch will include a License Grant. The License allows the Province to use, reproduce, publish, and distribute reports via the Provincial Archaeological Report Library (PARL). The License is appended to the 2024 application templates and posted on the Branch's website.

5. Submission and Review of Interim Reports

Reports submitted to the Branch will be uploaded via the Branch's permit application system (e.g., Archaeological Permit Tracking System - APTS) as readable PDFs and cannot be "locked." Please see the AIA Guidelines for additional details.

As of October 1, 2024, all deliverables submitted to the Branch, including interim and final reports, must include a Grant of License for Copyright. Refer to the permit application guidance for additional details.

Studies conducted for BCER-administered permits will be submitted per their requirements.

When management direction is required prior to the expiration of the permit:
Permit holders will submit time-sensitive interim reports. When time-sensitive reviews are requested, permit holders (or someone working on their behalf) will contact the Branch via archpermitapp@gov.bc.ca, to summarise why they are requesting an expedited review. It is helpful to describe the complexity of the assessment, the length of the report, relative urgency, and other relevant facts.

When management direction is not required prior to the expiration of the permit: Interim reports can be submitted individually, but Branch staff will prioritise review of time-sensitive reports, and may only review interims upon the completion of the final report.

Branch staff will review report(s) as needed and provide management directions to the proponent. If revisions are required, Branch staff may discuss edits directly with the report author and/or permit holder. Provincial agencies who have commissioned archaeological studies such as the Ministry of Transportation and Infrastructure, B.C. Parks, or B.C. Wildfire Service may be provided with notifications and/or detailed review comments on a routine basis.

All interim reports, regardless of whether they have been submitted individually, must be appended to the electronic version of the Final Permit Report, which is uploaded to APTS and ultimately posted by the Branch to the PARL. Hardcopy versions of the final report do not require interims as appendices, except at the Branch's request.

Proponents or archaeological firm principals may be advised when reporting and site record deficiencies delay the provision of management directions. A permit holder who persistently fails to provide adequate reports with appropriate management directions, or who fails to clearly demonstrate that studies met the terms and conditions of permits, may be ineligible to hold additional permits until they can demonstrate the ability to submit acceptable permit deliverables.

Change Log

Version Date	Key Changes
May 2004	Bulletin 10 created
August 2023	Interim Permit Reporting Procedures Policy and Bulletin 10 amalgamated; formatting and references to Branch policy, processes, and requirements updated; readability enhanced to address common issues.
July 2024	<i>Oil and Gas Activities Act</i> is now the <i>Energy Resource Activities Act</i> Minor wordsmithing updates to align with the 2024 HCA permit application templates. License Grants are required for materials, to support distribution of reports via PARL.