

INTERNAL AUDIT OF:

Crown Land Application Process

Ministry of Water, Land and Resource Stewardship

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Executive Summary and Overall Conclusion

Crown land is land, or land covered by water like rivers or lakes, that is owned by the Government of British Columbia (the Government). Crown land is available to the public for many different purposes from industry to recreation and research. Individuals and organizations may apply for the use of Crown land through a **Crown land tenure** application.

A **Crown land tenure** is a contractual arrangement between an individual or organization and the Government, authorizing the use of Crown land for a designated purpose.

Crown land is managed under the authority of the *Land Act*. Between 2022 and 2023, responsibility of Crown land was delegated from the Ministry of Forests to the Ministry of Water, Land and Resources Stewardship (the Ministry). This responsibility includes the adjudication and administration of Crown land tenures.

As of the end of fiscal 2024, the Ministry continues to experience a significant backlog with over 4,000 outstanding new applications and expired tenures, with an average queue time exceeding three years.

Internal Audit & Advisory Services (IAAS) conducted this audit to assess the Ministry's Crown land tenure application process (application process). The audit considered whether the Ministry developed a clear strategic and governance framework, administered Crown land tenures efficiently and effectively, and established monitoring and reporting functions over Crown land tenures.

Audit Observations

Overall, the Ministry has a defined process for managing the Crown land application process. Despite this, the current application process is insufficient, as demonstrated by the increasing backlog of Crown land applications and expired tenures.

This audit identified opportunities to improve the efficiency and effectiveness of the application process, including:

Strategic and Governance Framework: The Ministry has established a clear strategic framework for the application process. There are opportunities to strengthen the existing framework related to the alignment of priorities, establishment of key performance measures, and communication of clear risk tolerance.

Administration of Crown Land Applications: The Ministry has implemented and administered Crown land applications in accordance with relevant policies and procedures. However, the policies and procedures are not designed to address the backlog of applications and expired tenures in an efficient and effective manner.

Program Monitoring and Reporting: The Ministry proactively monitors data integrity and makes ongoing improvements on the adjudication process. Due to resource constraints, there is a gap in monitoring of existing tenures which creates risks and potential liabilities for the Government.

Recommendations

We recommend that the Ministry take timely and strategic action to address the current backlog of Crown land applications. This audit highlights 13 recommendations that can support this action, and strengthen the Ministry's management of the Crown land application process. These recommendations include actions to mature Crown land strategy and governance, strengthen the tenure application process, and reinforce monitoring and continuous improvement activities.

The scope of this audit focused on the Ministry's management of the application process. However, broader constraints such as legislative frameworks, budgetary limitations, and staffing capacity significantly influence the Ministry's abilities to address the existing backlog. These constraints have diverse impacts on operational effectiveness and on the possible actions the Ministry can take to address the audit recommendations.

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Ministry staff provided valued support and cooperation during the audit. We extend our sincere thanks to them for their active participation throughout this engagement.



Gavin Haigh, CPA
Senior Executive Director
Internal Audit & Advisory Services
Ministry of Finance

Introduction

The Ministry of Water, Land and Resource Stewardship (the Ministry) is responsible for administering and adjudicating Crown land tenures. The Ministry's authority to manage Crown land falls under the *Land Act*, the *Ministry of Lands, Parks and Housing Act*, and the *University Endowment Lands Act*.

The *Land Act* is the primary article of legislation that is used by the Government to convey interests in Crown land to the public for community, industrial and business use. The *Land Act* allows the disposition of land, and the issuance of Crown land tenure in the form of leases, licenses, permits and rights-of-way.

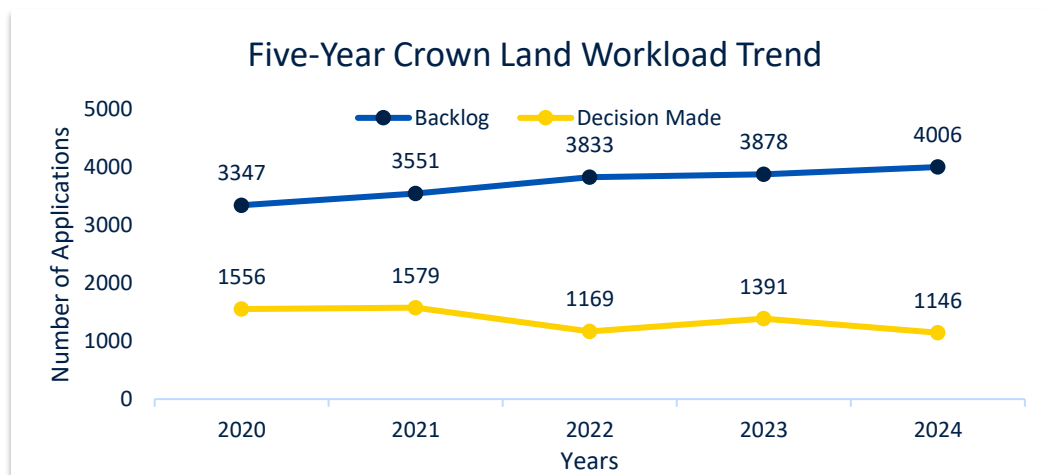
Crown land is available to the public for many different purposes from industry to recreation and research. Applications to use Crown land are typically submitted through FrontCounter BC, the Government's one-stop service window into natural resource permitting, licensing and tenures. Adjudication of applications is performed by the eight regional offices spread across British Columbia.

The Crown land registry is a record of all lands administered by the Government. It includes the acquisition and disposition of those lands, for the purpose of maintaining an inventory. As legislated by the *Land Act*, the Ministry is responsible for maintaining the Crown land registry and providing public access to the information contained within.

One of the key challenges faced by the Ministry is the backlog of new applications and expired tenures. As of the end of fiscal 2024, there were over 4,000 outstanding applications and expired tenures, with an average queue time exceeding three years.

Figure 1 shows the number of outstanding applications including expired tenures compared to the decisions rendered in the recent five years:

Figure 1: Five-Year Crown Land Workload Trend



Source: IAAS generated with monthly data reported by the Ministry

Since assuming the responsibility over Crown land in 2023, the Ministry has started to develop initiatives to help streamline the Crown land application process (application process) to address the backlog and process inefficiencies. Within the last 6 months, the Ministry has begun sharing workload by redistributing priority applications across the eight regional offices, leveraging the capacity of regions with greater availability. Despite this effort, the backlog continues to accumulate and the number of decisions continues to decline.

About the Audit

Audit Purpose

The purpose of the audit was to assess the Ministry's management of the application process, including new and replacement applications, and identify opportunities to improve its efficiency and effectiveness.

The objectives of this audit were to determine whether the Ministry:

- Established a clear strategic and governance framework for the application process;
- Administered Crown land tenures efficiently and effectively; and
- Implemented monitoring and reporting functions over Crown land tenures, including the data within the Crown land registry.

Audit Approach and Scope

The audit approach involved:

- Review and assessment of Ministry documentation;
- Interviews and site visits with Ministry staff, including staff from the Lands Branch, Authorizations Branch and FrontCounter BC; and
- Review of a sample of Crown land applications and tenures.

As part of the audit, Internal Audit and Advisory Services (IAAS) considered the established Crown land policies, processes, and guidance. IAAS conducted fieldwork between September 2024 and February 2025. During this time, IAAS met with Ministry Staff to discuss specific findings from the work performed. This report consolidates those findings.

Ministry Action Plan and Follow-up

The Ministry is required to develop an action plan in response to the recommendations provided, including the timeframe for implementation. IAAS conducts a follow-up process to ensure the recommendations are addressed.

1.0 Strategic and Governance Framework

IAAS assessed whether the Ministry established a clear strategic and governance framework for the application process which should include:

- A defined strategy that aligns with broader Ministry initiatives;
- An effective governance structure; and
- Ministry support and direction for the application process.

The Ministry has opportunities to improve its strategic governance framework related to the alignment of priorities, establishment of KPIs and communication of clear risk tolerance:

- 1.1 – While the Ministry has established a mature strategic framework, resources are not optimally allocated to achieve its objectives.
- 1.2 – The Ministry does not have effective key performance indicators in place.
- 1.3 – There is a lack of coordination between Permitting Solutions Branch and other branches, and variability in risk tolerance across regions.

1.1 Crown Land Strategy

IAAS assessed whether the Ministry conducts effective strategic planning for the application process including defining the strategic plan, and its alignment to broader Ministry and sector goals.

The Ministry has a mature strategic framework

The Ministry has established a strategic framework for the application process which incorporates key factors including the mandate letter, Ministry service plan, and executive direction. The Permitting Solutions Branch also contributes to this strategic framework by highlighting the priority areas that are relevant to all programs within the natural resource sector. This helps align Crown land management priorities with the broader sector level priorities, fostering greater cohesion among the different Government programs.

Misalignment of priorities at the regional level

IAAS observed that resources are not optimally allocated. As priorities are communicated to the regional offices, differences in interpretation create variances in the ranking of priorities. Additionally, each regional office has a unique workload which differs in the number of priority applications received. For example, housing is a priority, but these applications are less common in northern regions of British Columbia as opposed to the southern regions. As a result, the applications processed at the regional level may not always align with the established priorities. This leads to suboptimal allocation of resources as the province wide capacity is not matching established priorities.

The Ministry is currently in the process of developing a province-wide priority matrix, which has the potential to help address the issues identified. In combination with workload sharing, a standardized approach to evaluating and prioritizing applications across regions will improve consistency in how priorities are ranked and allocated.

Recommendations:

1. The Ministry should implement a framework to ensure the established priorities for the Crown land application process are aligned at the regional level.
 2. The Ministry should conduct an assessment of staffing strengths and weaknesses to inform the optimal resource allocation across applications.
-

1.2 Governance Structure

IAAS assessed whether the Ministry has established an effective governance structure for the application process which should include:

- Defined roles and responsibilities of parties involved in Crown land Management; and
- Existence of objectives and performance metrics.

The Ministry has defined the governance structure

Three branches play a critical role in the application process. **Figure 2** summarizes the branches and their respective responsibilities:

Figure 2: Roles and Responsibilities

Lands Branch	•Oversee legislation, policies and procedures •Management of the Crown land Registry
FrontCounter BC	•Intake of applications •Pre-technical review for completeness
Authorizations Branch	•Technical review of applications •Adjudication of application to determine final outcome

Source: IAAS generated

A lack of key performance indicators

IAAS observed that there are no effective key performance indicators (KPIs) in place for the application process. KPIs help identify inefficiencies by measuring areas of success and improvement. Previously, a KPI of a 140-day decision timeline was in place. As of the 2024 fiscal year end, the average time in queue for the backlog of new applications and expired tenures is over three years. This KPI is unachievable and has not been utilized. The absence of realistic KPIs hinders the Ministry's ability to effectively manage, evaluate and support the progress of reducing the backlog and average queue time.

Recommendation:

3. The Ministry should refine and monitor achievable key performance indicators that align with the goals and objectives of the Crown land application process.
-

1.3 Ministry Direction and Support

IAAS assessed whether the Ministry provides direction and support for the application process which should include:

- Ministry and executive support through strategic planning and directions; and
- Proactive communication and support of the established strategy.

Inconsistent communication

The Ministry and executive management provide direction and support for the application process through proactive communications. Operationally, various touchpoints exist between key branches to facilitate the discussion and resolution of emerging issues at both the management and staff levels. This collaborative approach fosters the sharing of information and best practices, enhancing the efficiency of problem-solving and decision-making processes.

IAAS observed that there is a lack of coordination between Permitting Solutions Branch and the other branches. The Permitting Solutions Branch leads a cross-government initiative to accelerate solutions to systemic permitting issues in the natural resource sector. Permitting refers to all types of approval-for-use requests that individuals or organizations submit to the Government involving the use of, or impacting, British Columbia's water, land, fish or wildlife. For example, Lands Branch was not aware of the work performed by Permitting Solutions Branch over the existing Crown land policies.

The lack of coordination between Permitting Solutions Branch and the other branches limits opportunities to discuss systemic Crown land permitting issues and duplicate efforts in creating solutions to those issues.

Recommendation:

4. The Ministry should establish a framework for the Permitting Solutions Branch, Lands Branch and Authorizations Branch to coordinate emerging permitting issues and solutions.
-

Variability in risk tolerance

Risk tolerance is the level of uncertainty that the Ministry is willing to accept on Crown land applications during the adjudication process. IAAS observed variances in the level of risk tolerance across the regional offices, inconsistencies include:

- Appetite to deny incomplete, non-responsive or contentious applications;
- Level of documentation required during the adjudication process; and
- Level of authority required for the decision approval.

Variations in risk appetite affect the timeliness of decisions and can create inconsistencies in the overall adjudication process. This effect is magnified when workload is shared across the different regional offices. Promoting consistency in

risk tolerance will improve the approach to the current adjudication process and can help reduce the backlog of applications and expired tenures.

Recommendation:

5. The Ministry should define and document a clear risk tolerance for the Crown land application process to encourage consistency in risk management and expectations.
-

2.0 Administration of Crown Land Applications

IAAS assessed whether the Ministry has administered Crown land applications efficiently and effectively which should include:

- Establishment of Crown land tenure application policies and procedures; and
- Adjudication of Crown land tenure applications consistent with the established policies and procedures

The Ministry's policies and procedures are not designed to address the backlog of applications and expired tenures in an efficient and effective manner:

- 2.1 – The Ministry has documented policies and procedures in place to support the adjudication process. However, there are gaps in onboarding and practical guides for new staff members.
- 2.2 – Adjustments to the Application Process are required to address the backlog of Crown land applications and expired tenures.

2.1 Policies and Procedures

IAAS assessed whether the Ministry established effective policies and procedures for the application process which should include:

- Establishment of policies and procedures;
- Alignment of policies and procedures with the *Land Act*; and
- Staff's understanding of existing policy and procedures.

Policies and procedures are in place

The Ministry has established a sufficient volume of policies and procedures for adjudicating Crown land tenure applications in alignment with the *Land Act*. This includes six general land policies, two strategic land policies, 24 land use policies and 27 procedures.

Additionally, the Ministry has created the Process Flow Chart which outlines step-by-step instructions from application intake to the tenure decision and file clean up. These resources are easily accessible to and utilized by the relevant staff involved in the adjudication process.

Gap in onboarding and job aids

Currently, the onboarding process includes one training course designed to provide an overview of the policies and procedures for the application and disposition of Crown land. There are opportunities for improvement in onboarding and job-aid materials.

To supplement the mandatory onboarding training, the regional offices have developed additional procedures to onboard new staff, including guidance on how to adjudicate regional applications. This creates a gap in the existing onboarding process, and generates inefficiencies through the development of duplicative materials, and introduces the risk of inconsistencies between regional offices.

The Ministry has created a working group to analyze and propose a solution to address the gap in onboarding. The regional offices hold regular meetings to address specific issues. These discussions are held for certain roles, and the sharing of information depends on who is participating.

Having a robust onboarding process helps ensure sufficient resources are available to train new staff and promotes efficiency and consistency between the regional offices.

Recommendation:

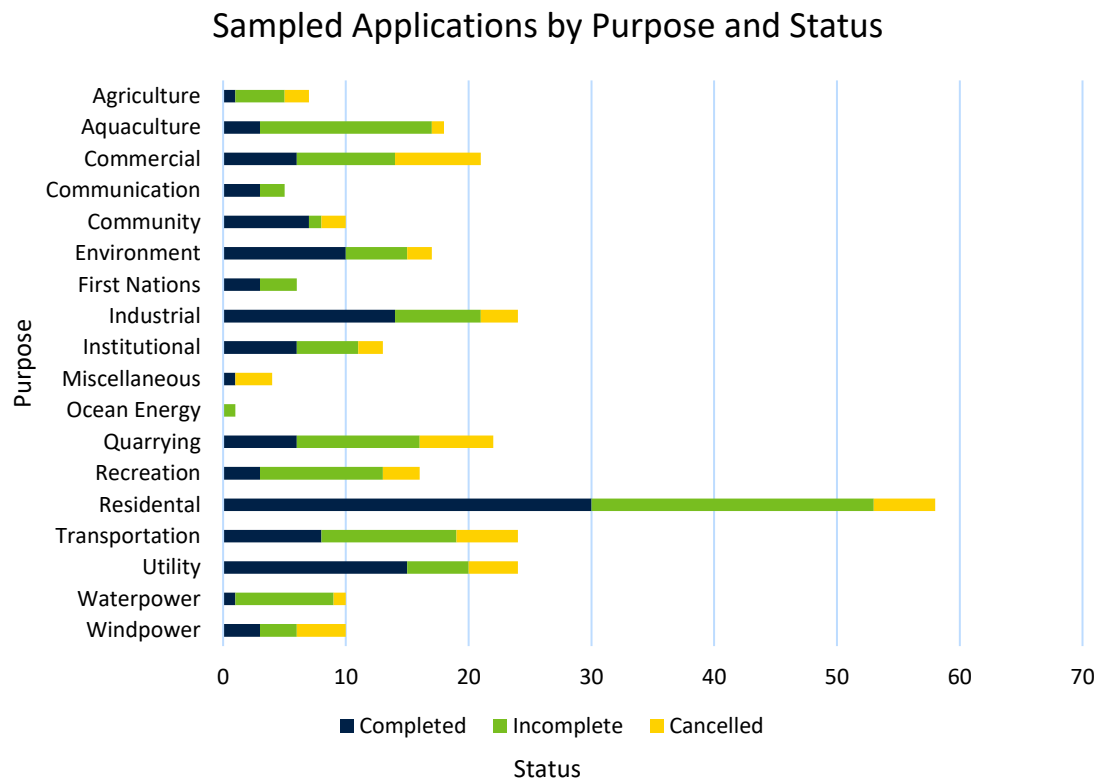
6. The Ministry should establish a centralized onboarding program for the Crown land application process supported by a comprehensive job aid that leverages the developed materials.
 7. The Ministry should ensure information from existing forums are shared with other staff including emerging issues and lessons learned.
-

2.2 Adjudication of Crown Land Applications

IAAS assessed whether the Ministry adjudicated Crown land tenure applications in accordance with the established policies and procedures.

Based on a sample of 290 Crown land tenure applications and expired tenures, the Ministry has adjudicated Crown land tenure applications in accordance with the established policies and procedures. **Figure 3** shows the breakdown of the samples:

Figure 3: Sampled Applications by Purpose and Status



Source: IAAS generated

IAAS observed several factors impact the Ministry's ability to address the backlog of applications and expired tenures including:

- Complex First Nations consultation process;
- Variance in the quality of applications;
- Inconsistent roles and responsibilities across regional offices;
- Inconsistent record filing methodology; and
- Staffing capacity constraints.

Complex First Nations consultation process

First Nations consultation is a complex step in the adjudication process. It includes the duty to consult and, where necessary, accommodate First Nations in relation to land and resource decisions that have potential to adversely impact First Nations interest on the land base. This process operates within a broader context, that includes multiple parties, timelines and capacities. IAAS observed opportunities to further strengthen strategic support, tools and guidance in this space.

In 2024, the First Nations Consultation System (FNCS) was introduced as a technological solution for simplifying how consultation is managed within the Government by bringing together information, spatial data, and processes into a single system. In practice, the system may not consistently align with program needs, includes many fields and functions not relevant to Crown land management, and is a duplication of information documented elsewhere.

Recommendations:

8. The Ministry should identify the source and ensure availability of First Nations consultation policy support and advice that is aligned with other programs and permits within the natural resource sector.
9. The Ministry should evaluate their use of the First Nations Consultation System for opportunities to enhance efficiencies and add value for the Crown land application adjudication process.

Gap in quality of applications

There are opportunities to improve the quality of applications accepted by FrontCounter BC. The initial applicant-focused workflow includes submissions of applications for the use of Crown land through an online portal. The Ministry has published guidance and standard templates to support the creation of applications. Contrary to the guidance and templates, the accepted applications often have gaps in information which necessitates the Ministry to work with applicants to obtain the relevant information. This creates additional delays before adjudication can begin.

The Ministry is currently reviewing and considering revisions to the existing guidance and templates. Improving the quality of applications will likely result in improved timeliness of the adjudication process.

Recommendation:

10. The Ministry should evaluate the initial applicant-focused workflows to improve the quality of applications received.
-

Inconsistent roles and responsibilities across regional offices

Although the Ministry has established a standardized process flow to adjudicate Crown land tenure applications, there is room for interpretation on the roles responsible for carrying out the steps. Using First Nations consultation as an example, each regional office has a specialized First Nations Consultation team.

In five regional offices, the consultation team performs the First Nations consultation as part of the adjudication process. In the remaining three regional offices, the Land Officers are responsible for the First Nation consultation with the consultation team providing support and guidance when necessary. Similar variances in responsibility exist between Natural Resource Specialists, Land Officers and Portfolio Administrators for the other steps in the adjudication process.

These inconsistencies can negatively affect the efficiency of workload sharing across the regional offices.

Recommendation

11. The Ministry should define the responsibilities of roles involved in the adjudication process.
-

Inconsistent record filing methodology

IAAS observed that the regional offices have different approaches to record filing:

- Two regional offices utilize a paper-based approach;
- Two utilize an electronic approach; and
- Four utilize a hybrid approach.

The Ministry has certain requirements on how records are kept and retained. However, the inconsistent record filing methodology creates inefficiencies for workload sharing, particularly for paper based regional offices that require files to be physically shipped. This introduces additional risks such as damaging or losing files during transit.

Recommendation:

12. The Ministry should establish a standardized record filing methodology that incorporates appropriate controls, complies with legal requirements, and can be efficiently streamlined and consistently implemented across regional offices.
-

Staffing capacity constraints

IAAS observed a high number of vacancies in the Authorizations Branch. **Table 1** summarizes the percentage of vacancies across the 8 regional offices as at the end of fiscal 2025:

Table 1: Regional Office Vacancies

Role	Vacancies	Total Positions	Vacancy Rate
First Nations Consultation Team	19	47	40.4%
Remaining Roles	75	385	19.5%
Grand total	94	432	21.8%

Source: IAAS generated

The vacancies create staffing constraints which negatively impact the Ministry's abilities to address the backlog of outstanding applications and expired tenures. The Ministry is pursuing workload sharing by reallocating priority applications across the eight regional offices. Despite this effort, this measure alone is insufficient to address the persistent imbalance between the incoming workload and processing capacity. A comprehensive reassessment of the application process, such as a risk-based approach, is necessary to effectively resolve the backlog.

Although this audit focused primarily on business processes related to the Crown land tenure applications, there are other factors, such as established legislation and budgetary constraints, that also play a role in the Ministry's ability to address the backlog.

3.0 Monitoring and Reporting

IAAS assessed whether the Ministry monitored and reported on the application process which should include:

- Monitoring Crown land tenures;
- Reporting of Crown land activities as required in the *Land Act* and
- Ongoing implementation of continuous improvement practices.

The Ministry is proactive in monitoring data integrity but monitors existing tenures based on complaints received. Continuous improvement practices are in place to address emerging issues.

- 3.1 – The Ministry proactively monitors the Crown land registry for data integrity, but reactively monitors existing tenures.
- 3.2 – The Ministry generates monthly reports to monitor the adjudication progress.
- 3.3 – The Ministry has multiple iterations of continuous improvements.

3.1 Monitoring

IAAS assessed whether the Ministry established an effective monitoring process for Crown land tenures which should include:

- Establishment of processes to monitor Crown land tenures; and
- Maintenance of the data contained within the Crown land registry for integrity.

Integrity of Crown land registry is proactively monitored

The Ministry has implemented internal monitoring mechanisms to ensure the integrity of the Crown land registry. This includes information technology controls and monthly reports to prevent and detect issues related to data integrity.

Based on a reconciliation of 75 files to test the integrity of the Crown land registry, these processes are operating as intended. Proactive data integrity monitoring supports data accuracy, completeness, and reliability which, in turn, helps informed decision-making.

Existing Crown land tenures are not proactively monitored

IAAS observed that the Ministry does not monitor existing Crown land tenures proactively. Each regional office is responsible for ensuring its tenures follow the

terms and conditions of the tenure agreement. Due to staffing constraints, monitoring of existing tenures is mostly driven by complaints received.

While comprehensive adjudication controls are essential, they must be complemented by consistent follow-up to effectively mitigate risks. Relying solely on a complaint-based process is inadequate for ensuring tenures adhere to the contractual terms. The lack of proactive monitoring for existing tenures increases the risk of misuse and mismanagement of Crown land creating risk for the Ministry.

Recommendation:

13. The Ministry should proactively monitor existing Crown land tenures, and the associated land base, using a risk-based approach.
-

3.2 Reporting

IAAS assessed whether the Ministry reports on Crown land activities as required in the *Land Act*.

The Ministry publishes applications that have been accepted on a publicly accessible website as required by the *Land Act*. Although there are no other legislated reporting requirements, the Ministry generates monthly internal reports to monitor progress such as Crown land applications' workload, completion and backlog. This provides information for the Ministry to make informed strategic and operational decisions.

3.3 Continuous Improvement Practices

IAAS assessed whether the Ministry has continuous improvement practice in place to support Crown land management.

The Ministry has implemented multiple iterations of continuous improvement processes for Crown land management. These initiatives included the Process Effectiveness and Efficiency Reviews, the Natural Resource Permitting Process, and the Crown Land Transformation Project.

The Ministry is currently working on various initiatives to improve existing practices including the Permitting Transformation Academy to address onboarding and guidance gaps, the provincial priority matrix to improve to better align priorities, revising current templates to improve the quality of applications, and workload sharing to better optimize resource allocation.

Appendix A: Summary of Recommendations

1	The Ministry should implement a framework to ensure established priorities for the Crown land application process are aligned at the regional level.
2	The Ministry should conduct an assessment of staffing strengths and weaknesses to inform the optimal resource allocation across applications.
3	The Ministry should refine and monitor achievable key performance indicators that align with the goals and objectives of the Crown land application process.
4	The Ministry should establish a framework for the Permitting Solutions Branch, Lands Branch and Authorizations Branch to coordinate emerging permitting issues and solutions.
5	The Ministry should define and document a clear risk tolerance for the Crown land application process to encourage consistency in risk management and expectations.
6	The Ministry should establish a centralized onboarding program for the Crown land application process supported by a comprehensive job aid that leverages the developed materials.
7	The Ministry should ensure information from existing forums are shared with other staff including emerging issues and lessons learned.
8	The Ministry should identify the source and ensure availability of First Nations consultation policy support and advice that is aligned with other programs and permits within the natural resource sector.
9	The Ministry should evaluate their use of the First Nations Consultation System for opportunities to enhance efficiencies and add value for the Crown land application adjudication process.
10	The Ministry should evaluate the initial applicant-focused workflows to improve the quality of applications received.
11	The Ministry should define the responsibilities of roles involved in the adjudication process.
12	The Ministry should establish a standardized record filing methodology that incorporates appropriate controls, complies with legal requirements, and can be efficiently streamlined and consistently implemented across regional offices.
13	The Ministry should proactively monitor existing Crown land tenures, and the associated land base, using a risk-based approach.

Appendix B: Ministry Response



Reference: 51663

August 25, 2026

VIA EMAIL: gavin.haigh@gov.bc.ca

Gavin Haigh
Senior Executive Director
Internal Audit and Advisory Services
Office of the Comptroller General

Dear Gavin Haigh:

Thank you for your letter of July 27, 2026 regarding the proactive release of the Internal Audit & Advisory Services Report entitled "Crown Land Application Process" for the Ministry of Water, Land and Resource Stewardship (WLRS).

While WLRS appreciates the important role Internal Audit and Advisory Services plays, the timing of this audit, as communicated by WLRS, was unfortunate as it was initiated just following a government reorganization that brought Lands staff and authorities to WLRS and at a time of significant focus on the development of initiatives with the intent of improving the administration of Land authorizations and the authorizations process. WLRS has received and reviewed the observations of the Internal Audit & Advisory Services Report and is of the belief that the 13 Recommendations for improvements and projects are substantially underway or will be superseded by upcoming initiatives.

More specifically, Recommendations 2, 7, 10 and 12 are substantially existing or underway; Recommendations 1, 4, 8, 9, and 11 are superseded by the Program's continuous improvement efforts; and there is a government mandated target that has been established in respect of Recommendation 3. Appendix A to this letter provides additional details of the WLRS Response to Summary of Recommendations.

In addition, since drafting of the Report the government has made significant commitments to improving the Province's regulatory framework through the Look West Economic strategy including:

- By 2030, achieve a 50 percent reduction in water and land authorization timelines; and
- By 2035, 100 percent of all permitting turnaround times will be met — meaning no backlogs — and British Columbia's (B.C.'s) regulatory system will be profiled as the best in the world, with predictable, timely authorizations that meet world-leading environmental standards.

Based on previously implemented process improvements, prioritization strategies and dedicated teams, WLRS is seeing significant reduction in turnaround times. This includes an approximately 80 percent reduction in timelines for electrification related applications. Ongoing work includes the Lands Authorizations Improvements Initiative (LAI), which brings together Lands Authorizations staff, Permitting Solutions staff and the Lands Programs team to advance a coordinated, cross-divisional approach to optimize land authorizations. The key focus is to:

- Strengthen timeliness and effectiveness of policy, and authorization processes across four streams, and
- Provide coordinated and consistent governance across all four work streams to accelerate delivery, resolve blockers, and align priorities across branches.

The four work streams are:

Expired Tenures (Replacements): Eliminate Lands Replacement Backlog in alignment with the Look West Strategy by creating a sustainable, consistent, risk-based, data-driven process that ensures all tenures coming up to the expiry date have a decision on a future tenure before expiry of a current tenure.

Adventure Tourism (AT) Heli/Cat Hub: Establishment of an AT Hub team that focuses on heli/cat assisted guiding and guided snowmobiling applications on Crown Land and within BC Parks. This will provide a consistent, efficient approach to heli/cat/snowmobile assisted authorizations across the province, that reduces application turn-round times for clients and informs future process and policy improvements.

First Nations Accommodation Policy: Assess and document existing accommodation tools, identify gaps in current land-related approaches, and analyze potential improvements to the existing model.

Alternative Forms of Authorizations: Calibrate lands authorizations processes to the nature of the decision by potentially expanding

permissions and streamlining the process, documentation, and associated resources required to provide a written authorization.

Additionally, there are several other individual projects which improve governance, administration, monitoring, and reporting:

- 13 Crown land policy, pricing procedure, template, and systems reviews and updates;
- Crown Land Registry systems amendments to reduce staff time for file rental calculations;
- Re-locating workload to other areas within Lands to centralize and develop a Centre of Excellence and efficiency (i.e. Forfeitures and School Reversions to Crown Land Opportunities);
- Pricing Simplification;
- Developing new policies or procedures for evolving land uses or processes (i.e. Restoration Directive and Termination Guidance); and
- Developing new forms for staff and clients to communicate and simplify application information (i.e. Assignment Form).

In conclusion, while the IAAS Audit provides another important perspective on the Lands Program, many of the recommendations are either in progress or are superseded by other initiatives to improve the management of Crown land in B.C. WLRS will consider these recommendations as it continues to implement improvement initiatives for the administration of Crown Land in the Province. As noted in the Audit, the fiscal constraints in the current operating environment will present challenges as the Ministry continues its efforts to improve its administration of lands authorizations.

Sincerely,



Lori Halls
Deputy Minister

Appendix A: WLRS Response to Summary of Recommendations

pc: Nicole Wright, Comptroller General, Office of the Comptroller General, Ministry of Finance

Colin Ward, Assistant Deputy Minister, Reconciliation, Lands, Policy and Data Division, Ministry of Water, Land and Resource Stewardship

Chris Trumpy, Assistant Deputy Minister, Permitting Transformation Division, Ministry of Water, Land and Resource Stewardship

Appendix A: WLRS Response to Summary of Recommendations

1	The Ministry should implement a framework to ensure the sector-level priorities are aligned at the regional level. Response: A Priority Matrix has been developed by Land Authorizations to provide direction to staff.
2	The Ministry should conduct an assessment of staffing strengths and weaknesses to inform the optimal resource allocation across applications. Response: Implementation of workload sharing and program or task-specific 'hubs' as appropriate, across the province, to optimize efficiency and effectiveness of staffing resources (i.e. BC Hydro applications, AT Hub, Expired Tenures team etc). Land Authorizations also recently been reorganized to leverage resources more broadly across three areas (Coast, South, North) as opposed to across eight regions. Analysis of historical applications and caseload volumes against staffing complements supported this change.
3	The Ministry should refine and monitor achievable key performance indicators that align with the goals and objectives of Crown land management. Response: The Look West Strategy outlines the targets which are to be adhered to by Crown Land Management (i.e. 50 percent reduction in timelines by 2030, by 2035, 100 percent of all permitting turnaround times will be met — meaning no backlogs — and B.C.'s regulatory system will be profiled as the best in the world, with predictable, timely authorizations that meet world-leading environmental standards). Application processing time targets have also been developed.
4	The Ministry should establish a framework for the Permitting Solutions Branch, Lands Branch and Authorizations Branch to coordinate emerging permitting issues and solutions. Response: The LAII consists of four priority projects, includes a framework/structure of reporting for Assistant Deputy Ministers, Executive Director, Directors and staff. It includes approved Project Workplans, regular meetings, and timeline targets.

5	The Ministry should define and document a clear risk tolerance for Crown land management to encourage consistency in risk management and expectations. Response: Land 101 and other training and communities of practice support ongoing training of staff. Projects like the updating the Management Plan templates will provide greater clarity and consistency for application receipt and processing, regarding risk tolerance. The <i>Land Act</i> Delegation Matrix outlines the authority level for each <i>Land Act</i> section. Specifically, Permitting Transformation Branch is developing a Risk Management learning framework for Land Authorizations staff, starting in fall 2026. This framework will provide clear guidance and expectations for managing application review and decision-making risk on a consistent basis.
6	The Ministry should establish a centralized onboarding program supported by a comprehensive job aid that leverages the developed materials. Response: The Permitting Transformation Learning Academy was developed to centralize learning materials and clarify learning required by position and level. Land 101 developed with Open School BC and Crown Land Registry Modules and other training materials support new staff, including communities of practice. Additional requirements or structure is under consideration.
7	The Ministry should ensure information from existing forums are shared with other staff including emerging issues and lessons learned. Response: A monthly Strategic Land Authorizations forum brings together Director-level representatives with responsibilities under the <i>Land Act</i> to share emerging information and lessons learned. Similar forums exist for more junior staff (e.g. Senior Land Authorization Staff, Senior Portfolio Administrators).
8	The Ministry should identify the source and ensure availability of First Nations consultation policy support and advice that is aligned with other programs and permits within the natural resource sector. Response: The Permitting Transformation Division reorganized to establish a dedicated First Nations Relations Team within Land Authorizations who provide consultation expertise to land authorizations staff. They rely upon consultation policy support from the Reconciliation, Lands, Policy and Data Division. Additionally, 'First Nations Accommodation' is one of the LAII Projects.

9	The Ministry should perform a cost-benefit analysis on the continued use of the First Nations Consultation System to evaluate whether the system adds value to the adjudication process. Response: The Ministry is developing a Business Case for capital funding to undertake improvements to the First Nation Consultation System (FNCS) suite of applications. This work includes extensive user research that informs approach and ensures that users' needs are prioritized regarding system upgrades. In the interim and until improvements are approved, funded, and executed, Land Authorizations decided to stop using FNCS, as it is deemed unable to provide consistent benefit or value to the adjudication process.
10	The Ministry should evaluate the initial applicant-focused workflows to improve the quality of applications received. Response: As noted in the Report, new and improved Management Plan templates for all <i>Land Act</i> applications which outline information required from clients are under development, in consultation with staff and clients which will support increased efficiency of the application process.
11	The Ministry should define the responsibilities of roles involved in the adjudication process. Response: The First Nations Relations team is now a Provincial Team as noted in Recommendation 8, supported by a formal roles and responsibilities document. Where inconsistency is recognized as an impediment to performance improvement, Land Authorizations is implementing process refinements. However, in some instances flexibility is considered a benefit that enables optimal use of resources.
12	The Ministry should establish a standardized record filing methodology that incorporates appropriate controls, complies with legal requirements, and can be efficiently streamlined across regional offices. Response: Land Authorizations has implemented an electronic filing protocol to align the record-keeping practices of each area team.
13	The Ministry should proactively monitor existing Crown land tenures, and the associated land base, using a risk-based approach. Response: Monitoring does not impact the efficiency or effectiveness of the application and replacement process, which is the purpose of this Report.

Appendix C: Abbreviations

Application Process	Crown land tenure application process
FNCS	First Nations Consultation System
Government	Government of British Columbia
IAAS	Internal Audit and Advisory Services
KPI	Key Performance Indicator
Ministry	Ministry of Water, Land and Resource Stewardship