



BC Timber Sales – 2017/18 SFI Surveillance/Scope Expansion Audit

Between June 2017 and March 2018 an audit team from KPMG Performance Registrar Inc. (KPMG PRI) carried out a multi-site surveillance/scope expansion audit of BC Timber Sales' operations within selected Business Areas against the requirements of the Sustainable Forestry Initiative® (SFI) 2015-2019 Forest Management Standard. To provide for a more efficient audit, an ISO 14001 surveillance audit was conducted at the same time. This Certification Summary Report provides an overview of the process and KPMG's findings.

Description of the BC Timber Sales Organization

BC Timber Sales is an autonomous organization within the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (MFLNRORD), with financial and operational independence from Regional and District operations. The organization is comprised of 12 Business Areas with an operational presence in 33 locations across the province, and supports the Ministry's goal of providing British Columbians with sustainable benefits from the commercial use of public forests. BC Timber Sales provides these benefits by planning, developing and selling through auction a substantial and representative portion of the province's annual available timber volume. The bid prices received from auctioned timber drive the Market Pricing System for setting stumpage in coastal and interior operating areas of the province. The organization manages approximately 20% of the provincial allowable annual cut (AAC). BC Timber Sales does not operate any forest products manufacturing facilities, nor does it have a fibre sourcing program.



BC Timber Sales Certifications

All 12 BC Timber Sales Business Areas are covered under a multi-site ISO 14001:2004 certificate. As BCTS has not decided to pursue certification to the new ISO 14001:2015, the organization's ISO 14001:2004 certification will expire at the end of the ISO 14001:2015 transition period on September 15, 2018. The organization also holds 3 single-site CSA Z809 certificates covering portions of the Peace-Liard (TPL) Business Area. In addition, BC Timber Sales holds a multi-site SFI 2015-2019 forest management certificate covering all or portions of its 12 Business Area (BA)s that is valid until September 9, 2022.



Scope of the BC Timber Sales SFI Certification

The BC Timber Sales multi-site SFI certificate applies to sustainable forest management planning and practices (roads, harvesting and silviculture) conducted by BC Timber Sales Corporate staff, Business Area staff, licensees/permittees and contractors (LPCs) in all or portions of the following Business Areas:

- Babine Business Area (TBA)
- Cariboo-Chilcotin Business Area (TCC)
- Chinook Business Area (TCH)
- Kamloops Business Area (TKA)
- Kootenay Business Area (TKO)
- Okanagan-Columbia Business Area (TOC)
- Peace-Liard Business Area (TPL)
- Prince George Business Area (TPG)
- Seaward-tlasta Business Area (TST)
- Skeena Business Area (TSK)
- Strait of Georgia Business Area (TSG)
- Stuart-Nechako Business Area (TSN)



A detailed listing of applicable forest management units is included as Appendix B of the BC Timber Sales Provincial Sustainable Forest Management plan at:

<https://www.for.gov.bc.ca/ftp/HBT/external/!publish/Web/EMS2/BCTS-Provincial-SFM-Plan.pdf>

At the time of the 2017/18 audit BC Timber Sales had a combined AAC apportionment of 14,011,600 m³ per year within the forest management units covered under its multi-site SFI forest management certificate. This equates to a prorated area under management of 10,930,186 hectares. The 2017/18 audit confirmed that BC Timber Sales had not exceeded its combined AAC apportionment for the most recent reporting year (the total harvest for the year across all Business Areas was 10,160,573 m³).

The portions of the BC Timber Sales Business Areas that are included within the scope of the organization's SFI certification are covered by a multi-site sustainable forest management (SFM) plan that addresses the Objectives of the SFI forest management standard and includes a variety of targets in relation to them. In addition, government-approved Forest Stewardship Plans (FSPs) that address both timber and non-timber values are also in place. Various higher level plans developed by government (e.g., Land and Resource Management Plans (LRMPs), etc.) also provide direction to forest management within the areas managed by the organization.

The areas covered by BC Timber Sales SFI certification fall within the following World Wildlife Fund (WWF) ecoregions: (1) Alberta-British Columbia Foothills Forests, (2) North Alberta Mountain Forests, (3) British Columbia Mainland Coastal Forests, (4) Cascade Mountains Leeward Forests, (5) Central British Columbia Mountain Forests, (6) Central Pacific Coastal Forests, (7) Fraser Plateau and Basin Complex, (8) Muskwa-Slave Lake Forests, (9) North Central Rockies Forests, (10) Northern Cordillera Forests, (11) Northern Pacific Coastal Forests, (12) Northern Transitional Alpine Forests, (13) Okanagan Dry Forests, (14) Pacific Coastal Mountains Icefields and Tundra, (15) Puget Lowlands Forests, and (16) Queen Charlotte Islands.

The forests managed by the BC Timber Sales are predominantly coniferous with the main commercial tree species being Douglas-fir, hemlock (western and mountain), western red cedar, yellow cedar, lodgepole pine, spruce (Sitka, white, black, Engelman and hybrids), grand fir, subalpine fir, balsam fir, western larch and trembling aspen.

The forest management approach employed by BC Timber Sales is based primarily on even-aged management, ground and overhead cable-based harvesting systems, clearcut harvesting with the retention of reserves of standing trees (either within or adjacent to harvest areas), replanting of harvest areas within a few years with a mix of ecologically suited tree species and control of competing vegetation through the use of government-approved chemical herbicides (only some Business Areas) and/or mechanical means. Controls are in place to help reduce reliance on chemical brush control where feasible to do so.

Audit Scope

The ISO 14001 portion of the audit included a limited scope assessment of the BC Timber Sales environmental management system (EMS) against the requirements of the ISO 14001:2004 standard. The SFI portion of the audit was conducted against the requirements of the SFI 2015-2019 forest management standard, and incorporated an assessment against the SFI program objectives for:

1. Forest management planning (TKA and TOC only);
2. Forest health and productivity (TKA and TOC only);
3. Protection and maintenance of water resources;
4. Conservation of biological diversity (TKA and TOC only);
5. Management of visual quality and recreation benefits;
6. Protection of special sites (TKA and TOC only);

BC Timber Sales 2017/18 SFI Surveillance/Scope Expansion Audit Findings

Open non-conformities from previous audits	6
New major non-conformities	0
New minor non-conformities	3
New systemic opportunities for improvement	3

Types of audit findings Major non-conformities:

Are pervasive or critical to the achievement of the SFM Objectives.

Minor non-conformities:

Are isolated incidents that are non-critical to the achievement of SFM Objectives.

All non-conformities require the development of a corrective action plan within 30 days of the audit. Corrective action plans to address major non-conformities must be fully implemented by the operation within 3 months or certification cannot be achieved / maintained. Corrective action plans to address minor non-conformities must be fully implemented within 12 months.

Opportunities for Improvement:

Are not non-conformities but are comments on specific areas of the SFM System where improvements can be made.

7. Efficient use of fibre resources;
8. Recognize and respect Indigenous Peoples' rights (TKA and TOC only);
9. Legal and regulatory compliance;
10. Forestry research, science and technology (TKA and TOC only);
11. Training and education (TKA and TOC only);
12. Community involvement and landowner outreach;
13. Public lands management responsibilities (TKA and TOC only);
14. Communication and public reporting (TKA and TOC only), and;
15. Management review and continual improvement.

The Audit

- **Audit Team** – The audit was conducted by Dave Bebb, RPF, EP(EMSLA), Mike Alexander, RPF, EP(EMSLA), Del Ferguson, P.Geo, FGAC, Branden Beatty, RPBio, EMS(LA), Sylvi Holmsen, RPF, CA, EP(EMSLA), Dennis Lozinsky, RPF, EP(EMSLA), Yurgen Menninga, RPF, EP(EMSLA) and Craig Roessler, RPF, EP(EMSLA). All of the members of the audit team have conducted numerous SFM audits under a variety of standards including SFI, ISO 14001, CSA Z809 and FSC.
- **Combined 2017/18 SFI/ISO 14001 Audit** – The audit included an assessment of the BC Timber Sales' EMS and SFI program. Site visits were made to 9 out of the 12 Business Areas (TCH, TPL, TSN, TPG, TCC, TKA, TSK, TKO and TOC). In addition, the audit included an assessment of the BC Timber Sales Corporate Office's implementation of the SFI program requirements that are applicable at the corporate level. This level of sampling meets the IAF (International Accreditation Forum) requirements regarding audit sampling for multi-site certifications with 12 sites. The audit involved a review of selected EMS and SFI records, interviews with a sample of staff, licensees and local stakeholders, and visits to several field sites (75 roads, 65 cutblocks, 39 silviculture sites and 2 marine log dumps) to assess conformance with the requirements of the SFI 2015-2019 Forest Management Standard. The SFI portion of the audit took approximately 60 days to complete, 45 of which were spent on-site. The balance of audit time was spent preparing the audit plan, completing off-site document reviews of and completing various audit checklists and preparing the main and public summary audit reports.
- **BC Timber Sales' SFI Program Representative** – Rein Kahlke, RPF, BC Timber Sales Certification Officer served as the organization's corporate level SFI program representative during the audit. In addition, the various Certification Standards Officers (CSOs) located at each of the local Business Area offices included in the audit sample acted as the SFI program representatives at the Business Area level.

Audit Objectives

The objective(s) of the audit were to evaluate the environmental and sustainable forest management system at BC Timber Sales to:

- Determine its conformance with the requirements of ISO 14001:2004 and the SFI 2015-2019 Forest Management Standard;
- Evaluate the ability of the system to ensure that BC Timber Sales operations meet applicable regulatory requirements;
- Evaluate the effectiveness of the system in ensuring that BC Timber Sales meets its specified SFM objectives;
- Identify opportunities for improvement, where applicable, and;
- Expand the scope of BC Timber Sales' SFI forest management certification to include all of the Kamloops and Okanagan-Columbia Business Areas.



BC Timber Sales is an autonomous organization within the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (MFLNRORD), with financial and operational independence from Regional and District operations. The organization is comprised of 12 Business Areas with an operational presence in 33 locations across the province, and supports the Ministry's goal of providing British Columbians with sustainable benefits from the commercial use of public forests. BC Timber Sales provides these benefits by planning, developing and selling through auction a substantial and representative portion of the province's annual available timber volume. The bid prices received from auctioned timber drive the Market Pricing System for setting stumpage in coastal and interior operating areas of the province. The organization manages approximately 20% (14 million m³/year) of the provincial allowable annual cut (AAC).

Use of Substitute SFI Indicators

The SFI portion of the audit involved an assessment of conformance against the applicable objectives, performance measures and indicators included in the SFI 2015-2019 Forest Management Standard. None of the indicators included in the SFI standard were modified or substituted for the purpose of this audit.

Audit Conclusions

The audit found that the BC Timber Sales sustainable forest management system:

- Was in full conformance with the requirements of the SFI and ISO 14001 standards included within the scope of the audit, except where noted otherwise in this report;
- Has been effectively implemented, and;
- Is sufficient to systematically meet the commitments included within the organization’s environmental and SFM policies, provided that the system continues to be implemented and maintained as required.

As a result, a decision has been reached by the lead auditor to recommend that: (1) BC Timber Sales continue to be certified to the ISO 14001:2004 and SFI forest management standards, and (2) the scope of the BC Timber Sales SFI forest management certification be expanded to include all of the Kamloops and Okanagan-Columbia Business Areas, portions of which were previously covered under single-site CSA Z809 certificates.

Evidence of Conformity with the SFI 2015-2019 Forest Management Standard

SFI Objective #	Key Evidence of Conformity
1. Forest Management Planning	SFM plan, FSPs, Timber Supply Review (TSR) AAC Rationales, Geographic Information System (GIS), review of site plans, interviews with a sample of staff and LPCs, field inspections. (TKA and TOC only)
2. Forest Health and Productivity	SFM plan, FSPs, EMS operational controls, review of site plans, interviews with a sample of staff and LPCs, review of silviculture records for selected operations, field inspections. (TKA and TOC only)
3. Protection and Maintenance of Water Resources	SFM plan, FSPs, EMS operational controls, conformance with the results of watershed assessments, review of site plans & harvest plans, field inspections.
4. Conservation of Biological Diversity	SFM plan, FSPs, interviews with planning staff, EMS operational controls, review of wildlife and biodiversity information and strategies contained in BA GIS, site plans, inspection of a sample of field sites. (TKA and TOC only)
5. Management of Visual Quality and Recreational Benefits	SFM plan, FSPs, review of site plans and associated Visual Impact Assessment (VIA) results, interviews with a sample of staff and LPCs, field inspections.



The audit involved a review of selected EMS and SFI records, interviews with a sample of staff, licensees and local stakeholders, and visits to several field sites (75 roads, 65 cutblocks, 39 silviculture sites and 2 marine log dumps) to assess conformance with the requirements of the SFI 2015-2019 Forest Management Standard.

SFI Objective #	Key Evidence of Conformity
6. Protection of Special Sites	SFM plan, FSPs, review of site plans and associated Archaeological Impact Assessment (AIA) results, review of selected stakeholder and First Nations consultation records, field inspections. (TKA and TOC only)
7. Efficient Use of Fibre Resources	SFM plan, waste survey results, final block inspections, inspection of a sample of recently completed harvesting areas.
8. Recognize and Respect Indigenous Peoples' Rights	BCTS policy on Indigenous Peoples' rights, records of consultation with local Indigenous Peoples, interviews with BCTS staff and representatives of local Indigenous Peoples. (TKA and TOC only)
9. Legal and Regulatory Compliance	SFM plan, BC Timber Sales environmental, social and health & safety policies, BA and Provincial level EMS and SFI management review records, BC MFLNRO C&E reports, BA non-compliance records, field inspections.
10. Forestry Research, Science & Technology	SFM plan, BA and Provincial level SFI management review records, BA research records, interviews with BA staff. (TKA and TOC only)
11. Training and Education	SFM plan, EMS and SFI awareness training materials and records, staff and LPC employee interviews. (TKA and TOC only)
12. Community Involvement and Landowner Outreach	SFM plan and related monitoring results, WCSIC meeting minutes, correspondence related to community and school outreach programs, staff interviews.
13. Public Land Management Responsibilities	SFM plan, FSPs and related agency and stakeholder referral correspondence, review of site plans, review of selected stakeholder consultation records, field inspections. (TKA and TOC only)
14. Communication and Public Reporting	Certification summary report. (TKA and TOC only)
15. Management Review and Continual Improvement	SFM plan, BA and Provincial level EMS and SFI management review records, internal audit reports and associated action plans, BA and Provincial level Environmental Management Programs (EMPs), interviews with a sample of corporate and BA staff.



The audit included site visits at various times of the year in order to assess conformance with SFI forest management requirements under as broad a range of field conditions as possible.

Follow-up on Findings from Previous Audits

At the beginning of the audit period there were a total of 9 open minor non-conformities from previous audits that were applicable at the corporate level. The audit team reviewed the implementation of the action plans developed by BC Timber Sales to address these findings and found that progress had been made towards addressing the majority of these audit findings. However, recurrence of the issues that gave rise to some of these findings was noted during a number of 2017/18 audit site visits. In addition, although TCC had provided EMS boot camp training to several (but not all) staff at the time that the October 10-12, 2017 TCC special purpose visit took place and has recently hired a new CSO, some ongoing weaknesses in EMS implementation were still noted at this BA. As a result, 2 of the open minor non-conformities from previous audits have now been closed, 1 has been downgraded to an opportunity for improvement and 6 remain open, the majority of which relate to weaknesses in EMS implementation noted at TCC. The 2018/19 audit will include an assessment of BC Timber Sales' continued efforts to address the 6 remaining non-conformities from previous audits that remain open.

Good Practices

A number of good practices were identified during the course of the 2017/18 BC Timber Sales ISO 14001/SFI audit. Examples included:

- SFI Forest Management Objective 2 (forest health and productivity): BCTS has recently implemented a performance rating system for silviculture contractors that is used in the evaluation of future bids. This system is a good step towards helping ensure a better quality product from silviculture contractors. (Corporate)
- SFI Forest Management Objective 3 (riparian management): Inspection of a sample of active and recently completed TSN harvest blocks found that the riparian management practices on these sites were fairly conservative. Streams and wetlands were in most cases either excluded from the block area or contained in on-block WTRAs (Wildlife Tree Retention Areas), resulting in a level of protection of riparian features that exceeded the commitments in the applicable FSP. (Start-Nechako Business Area)
- SFI Forest Management Objective 3 (riparian management): Review of a TSL site plan and harvest plan and associated maps, combined with on-site observations noted 26 non-classified watercourses (NCWs) that had been identified and mapped. The NCWs were also identified on the ground by flagging and paint. The level of detail provided on maps and on the ground helps limit risk of operators disturbing NCWs. (Peace-Liard Business Area)
- SFI Forest Management Objective 5 (management of visual quality and recreational benefits): The audit observed numerous examples of TCH effectively protecting trails used by mountain and motor bike users. For example, a light touch respecting trails was observed on 2 TSLs where trails were not disturbed except at designated crossings (which are cleaned up afterwards) due to fall away/yard away practices, and some non-merchantable trees and vegetation were retained where possible. The operation works closely with such groups (and First Nations) at the planning and implementation phases to better address their interests in the site plans and during operations and to promote good relationships. (Chinook Business Area)
- SFI Forest Management Objective 11 (training and education): In order to help address the current shortage of Forest Technologists, TPG is participating in the BCTS Forest Technologist Entry Level Program (FTELP). This is a two-year on-the-job training program for Forest Technology Diploma program graduates, followed by at least two-years of full-time regular employment with BCTS in Northern B.C. (Prince George Business Area)



The audit observed numerous examples of TCH effectively protecting trails used by mountain and motor bike users. For example, a light touch respecting trails was observed on 2 TSLs where trails were not disturbed except at designated crossings (which are cleaned up afterwards) due to fall away/yard away practices, and some non-merchantable trees and vegetation were retained where possible. The operation works closely with such groups (and First Nations) at the planning and implementation phases to better address their interests in the site plans and during operations and to promote good relationships. (Chinook Business Area)

- SFI Forest Management Objective 15 (management review and continual improvement): The audit found that the Skeena Business Area has demonstrated a commitment to continual improvement by developing supplemental guidance to assist staff to meet or exceed SFI objectives. A review of the Skeena BA public website noted 30 SOPs (standard operating procedures) ranging from topics for erosion control, invasive plants, cultural heritage, stand level retention, etc. (Skeena Business Area)

NB: The above list of good practices is not intended to be a comprehensive list of all of the noteworthy or innovative forest practices that are taking place at the operations included in the 2017/18 audit sample. Rather, they are simply observations made by the audit team that were deemed worthy of inclusion in this public summary report as a means to highlight some of the positive aspects of the organization's forest management practices.

New Areas of Nonconformity

The 2017/18 BC Timber Sales ISO 14001/SFI audit identified a total of 3 new minor non-conformities in relation to the requirements of the SFI 2015-2019 Forest Management Standard, as follows:

- SFI Forest Management Performance Measure 3.2 requires Program Participants to develop and implement plans to manage or protect rivers, streams, lakes and other water bodies. In addition, EFP 01 requires LPCs to have a project plan (which include riparian management prescriptions), while EFP 04 requires them to minimize the impact of their activities on water quality and site productivity. However, field inspection of a sample of active and recently completed field sites identified a number of weaknesses in the implementation of riparian management practices, as follows: diversion of an S6 stream into a ditchline resulting in an increased risk of erosion and slope failure, failure to install cross-drains on an in-block road as originally prescribed, 1 winter and 1 summer-constructed road that due to the absence of drainage structures channeled water for a considerable distance on an adverse grade, resulting in soil erosion and the potential to impact fish-bearing streams, and scouring and slumping of a road ditchline due to a failure by the licence holder to install cross-drains or waterbars on a road (Chinook, Peace-Liard and Kootenay Business Areas).
- SFI Forest Management Performance Measure 9.1 requires that Program Participants develop and implement a system to comply with applicable laws and regulations. This requirement is addressed through various BCTS EMS procedures including the EMS Manual, EFP 02 and EOP 04. These procedures include requirements for tracking and taking action to address environmental incidents that are identified through inspections. Under the BCTS EMS this is required to be documented in the Incident Tracking System (ITS). However, the audit identified a number of weaknesses in the implementation of the ITS, as follows: although action plans had been developed by one Business Area to address the results of a recent internal audit, the root cause(s) of these findings had not been documented as required, review of 1 incident in the field found that it had not been entered into ITS and there was no BCTS follow-up on corrective actions requiring the clean-out of debris that had been deposited in a S6 stream, one instance of a BCTS inspection that identified weaknesses related to LPC training records and self-inspections where no corrective actions, due dates or follow-up inspection comments had been entered into ITS, and a few instances of incidents recorded in ITS that had overdue action plans (Peace-Liard, Kootenay and Kamloops Business Areas).
- SFI Forest Management Performance Measure 9.1 requires that Program Participants develop and implement a system to comply with applicable laws and regulations. This requirement is addressed through various BCTS EMS operational controls including EFP 01, EFP 02, EFP 04, EFP-06, site plans and TSL documents. However, the audit identified a number of weaknesses in the implementation of EMS operational controls, as follows: failure by a TSL holder to



The audit included the inspection of a sample of temporary and permanent bridges to assess their conformance with both regulatory and BCTS EMS requirements.

retain the required number of deciduous stems on a harvest block, operation of equipment on sensitive soils resulting in localized soil disturbance that could have been avoided, construction of a remote camp and associated sanitary facilities without the required permits, failure by a TSL holder to complete a fire hazard assessment for a harvest block as required under section 11(3) of the BC Wildfire Regulation, failure of a BCTS inspection of a licensee field camp to identify a number of weaknesses in the implementation of the applicable requirements of the EMS and TSL document (e.g., operation of open black sewage pits in contravention of the TSL document, failure to store and dispose of industrial waste as required, failure to clean up a spill of hydraulic oil and improper storage of 4 propane tanks), and failure by a TSL holder to provide the required collision protection for a large stationary fuel tank located on an active timber sale (Peace-Liard, Prince George and Kamloops Business Areas).

New Opportunities for Improvement

Several opportunities for improvement, many of which were restricted to a single Business Area, were identified during the 2017/18 BC Timber Sales ISO 14001/SFI audit. These have already been reported to BCTS through the Business Area level audit reports that were provided to the organization either on-site or soon after the applicable Business Area site visits took place.

This corporate level Certification Summary Report only includes systemic (i.e., corporate level and/or multi-Business Area) opportunities for improvement.

The 2017/18 BC Timber Sales ISO 14001/SFI audit identified a total of 3 new systemic opportunities for improvement that related to the requirements of the SFI 2015-2019 Forest Management Standard, as follows:

- SFI Performance Measure 2.3 requires Program Participants to implement forest practices to protect and maintain soils and forest productivity. BCTS has developed various procedures and operational controls in support of these requirements (e.g., EFP 01, EFP 06 and the LPC ERP template), which include requirements related to emergency preparedness and response. However, a number of weaknesses in the implementation of the BCTS emergency preparedness and response procedures were noted, as follows: 1 small (<450 litre) truck-mounted fuel tank that did not have the required Transportation of Dangerous Goods (TDG) label, a few examples of missing or incomplete spill kits, missing emergency response procedure testing records on 1 active TSL, and lack of any handtools on an active TSL during fire season (although an adequate water delivery system was present) (Prince George, Kootenay and Chinook Business Areas).
- SFI Forest Management Performance Measure 9.1 requires that Program Participants develop and implement a system to comply with applicable laws and regulations. This requirement is addressed through various BCTS EMS procedures including the EMS Manual and EFP 02, which include requirements regarding the monitoring of LPC operations. However, the audit identified a number of weaknesses in the implementation of BCTS monitoring and measurement procedures, as follows: on 1 TSL, corrective actions identified on an LPC self-inspection had not been assigned due dates and on another TSL the required LPC self-inspections were not present on-site, field inspection of 1 silviculture site identified an area of NSR (not satisfactorily restocked) ground that had not been identified in a recent silviculture survey conducted by a contractor to BCTS, weaknesses at 1 Business Area regarding the timeliness of inspections of LPC operations, and review of the inspections for 1 TSL found that the BCTS inspections had not noted the fact that the TSL holder had installed log fills as cross-drains and on crossings of NCDs (non-classified drainages) in lieu of the culverts specified in the TSL document in the absence of any clear process to manage the additional risk to riparian values that such crossings present (Prince George, Kamloops, Stuart-Nechako and Kootenay Business Areas).



The audit included an assessment of BCTS' conformance with various EMS requirements, including those designed to help ensure compliance with federal requirements for the transportation of dangerous goods (TDG).

- SFI Forest Management Performance Measure 9.1 requires that Program Participants develop and implement a system to comply with applicable laws and regulations. These requirements are addressed through various BCTS EMS procedures including EMS Chapter 12, Site Plans and pre-works. However, the audit identified a number of weaknesses in the content and/or implementation of site plans, as follows: although a mining adit (entrance) and tailings pile had been protected in a WTRA (although machine tracks were noted through the WTRA along the boundary), the purpose of the WTRA was not articulated in the site plan and there was confusion amongst BCTS staff regarding the actual location of these resource features which increased the possibility of unintended impacts, and an opportunity to improve the documentation of resource features in some site plans to ensure that adequate information is communicated to TSL holders and BCTS staff (e.g., 1 site plan that did not indicate the specific location of a fence that was prescribed for protection and another site plan that lacked details regarding the location of a fence that was to be protected or any comments regarding its current condition, making it impossible to determine if the observed damage to the fence was pre-existing or a result of logging operations (Kootenay Business Area)

Corrective Action Plans

Corrective action plans designed to address the root cause(s) of the findings identified during the 2017/18 audit have been developed by BC Timber Sales and reviewed and approved by KPMG PRI. The next surveillance audit will include a follow-up assessment of these issues to confirm that the corrective action plans developed to address them have been implemented as required.

Focus Areas for the Next Audit Visit

The following issues/potential concerns have been identified as focus areas for the next audit visit:

- Implementation of the action plans developed by BC Timber Sales to address all open non-conformities identified during previous external audits.
- Follow-up on the Business Area-specific EMS issues/potential concerns noted in the applicable 2017-2018 Business Area audit reports.
- Progress towards more consistent implementation of the EMS at the Cariboo-Chilcotin Business Area.
- Effectiveness of BCTS inspection and corrective action processes in identifying and addressing weaknesses in LPC conformance with EMS requirements.
- BCTS' efforts to address the risks to riparian resources in situations where the TSL holder has installed log fills instead of the culverts specified in the TSL document.
- Advisory Bulletin No. 2015/09/22 outlines the requirement for TSL holders to have a plan for conducting primary forest activities and the circumstances under which an amendment to the plan may be required. The 2018/19 audit will include an assessment of the application of these requirements where a change to the plan is proposed by the TSL holder.



Inspection of a sample of recently reforested harvest blocks found a high level of compliance with the reforestation standards outlined in the applicable Forest Stewardship Plan.

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