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# AUDIT PLAN 2024/25



## Chief Auditor's Remarks

I am pleased to release the 2024/25 Audit Plan for the Mine Audits Unit (the Audit Unit). This plan identifies the audit priorities for the 2024/25 fiscal year (FY), which runs from April 1, 2024 to March 31, 2025.

As described in the 2023/24 Audit Plan, the team prioritized advancing the work on its existing projects over the past year. As we continue to move the projects forward, it is anticipated the [Security for Exploration Activities](#) will be released in Fall 2024 and the [Confined Space](#) audit will be finalized in early 2025. The audits on [Major Mine Closure](#) and [Occupational Health and Safety Committees](#) are anticipated to be completed in the 2025/26 fiscal year.

In June 2024, the Ministry of Energy, Mines and Low Carbon Innovation (the Ministry) provided the Chief Auditor with a [progress update](#) summarizing actions taken in response to the team's first two audit reports: [Code Requirements for Tailings Storage Facilities](#) (2021) and [Worker Protection in Mobile Equipment Near Water](#) (2022). Per our [Memorandum of Understanding](#) the Ministry has committed to providing the Chief Auditor with annual progress updates on action taken to address previous audit recommendations. The most recent progress update is available on our website and the update reports that the Ministry has completed implementation of all 15 planned actions.

The Audit Unit continues to strengthen its relationships with internal and external stakeholders, including indigenous people. Through the audit planning process, the team engaged with the B.C. First Nations Energy and Mining Council (FNEMC), the Ministry, and numerous industry partners. In addition, the team has worked on updating the [Memorandum of Understanding](#) with the FNEMC and we look forward to finalizing these efforts in the upcoming year.

I look forward to the coming year of working with the Audit Unit and our stakeholders to identify opportunities to improve the regulatory program for mining in British Columbia.

Kevin Kirkland  
*Chief Auditor*

# Background

## MINE AUDITS UNIT

The Mines Audit Unit (Audit Unit) is led by the Chief Auditor, who is an independent Statutory Decision Maker appointed under the *Mines Act*. Through the Chief Auditor, the Audit Unit has the mandate to conduct audits evaluating the effectiveness of British Columbia's regulatory framework for mining, as well as the policies, programs, practices and actions which fulfill that framework.

The Audit Unit was established in 2018 and is a dedicated team of specialists that plan and carry out audits, with each culminating in a public report with recommendations from the Chief Auditor.

## PURPOSE OF THE AUDIT PLAN

As required by the *Mines Act*, the Chief Auditor publishes an annual [Audit Plan](#) identifying the subject matter of the audits to be given priority during the year.

The Audit Plan provides audit teams with a starting point for their work. From there, the teams develop a specific objective, scope and design for each audit based on research and engagement with Indigenous peoples and interested parties (e.g., industry, labour representatives, non-governmental organizations and other regulatory bodies).

Every audit included in the Audit Plan will generally consist of four iterative phases:

- ▶ **Planning** – Gather background information on the audit topic and develop a plan for the audit, which is summarized in a Terms of Reference, and published on the Audit Unit's website.
- ▶ **Examination** – Collect and analyze data to establish findings and develop a conclusion in response to the audit objective.
- ▶ **Reporting** – Develop and release a report summarizing the audit findings, conclusion and recommendations.
- ▶ **Follow up** – Monitor the Ministry's actions in relation to the audit findings, conclusion and recommendations.

The Chief Auditor may review and adjust the Audit Plan, as necessary. Any changes will be documented and reported in the following year's Audit Plan.

## AUDIT TOPIC SELECTION

The Audit Unit identifies topics of interest on an ongoing basis through multiple information sources, including Ministry data and previous audit findings. The Audit Unit also accepts topic suggestions from other government staff, Indigenous representatives and external parties. If a topic is aligned with the Audit Unit's mandate, it will be meaningfully considered for an audit.

In each annual planning cycle, the Audit Unit prioritizes its current list of potential topics and develops a shortlist for the Chief Auditor's consideration. Prioritization is based on the following factors:

- ▶ **Value** – The potential benefit of performing an audit to provincial mining regulation
- ▶ **Interest** – Different perspectives about the topic and its relative importance to Indigenous peoples and interested parties
- ▶ **Auditability** – The Audit Unit's ability to complete an audit of the topic given available resources, expertise, data and information

The Chief Auditor decides which topics to include in the Audit Plan each year, in consideration of the shortlist of priority topics. Any potential topics not included in the Audit Plan may be considered in future years.

# PRIORITIES IN 2024/25

## NEW PLANNED AUDITS

The plan for 2024/25 introduces one new planned audit: Management of Non-Compliance. The regulatory requirements established in the *Mines Act*, the Health Safety and Reclamation Code (Code) and permits are in place to protect the environment, workers and the public; the Ministry's ability to enforce regulatory requirements in response to a non-compliance has a direct impact on public, worker and environmental protection. The audit is not fully scoped, and the description provided is subject to change based on learnings by the audit team during the planning phase.

Audit Topic	Description
<b>Management of Non-Compliance</b>	The Ministry has a variety of compliance and enforcement tools available to ensure that the environment, human health, public safety and the natural resource are protected if a non-compliance occurs. This audit will focus on the effectiveness of the Ministry's use of the tools to achieve compliance.

## AUDITS IN PROGRESS

The Audit Unit has four audits in progress, which are summarized below, including links to each audit's Terms of Reference.

Project Name	Objective	Status at beginning of FY 2024/25	Expected status by end of fiscal
<a href="#">Confined Space</a>	To determine whether the Ministry's regulatory program supports effective management of confined spaces.	Examination phase	Completion
<a href="#">Major Mine Closure</a>	To determine whether the Ministry's regulatory program is setting major mines up to successfully advance the process of mine closure to meet post-mining land uses.	Examination phase	Reporting phase
<a href="#">Occupational Health and Safety Committees</a>	To determine whether the Ministry's regulatory program supports the identification of workplace hazards by occupational health and safety committees and the mitigation of those hazards.	Examination phase	Reporting phase
<a href="#">Security for Exploration Activities</a>	To determine whether the process for managing security for exploration activities accounts for mine reclamation and the mitigation of damage to watercourses and cultural heritage resources.	Reporting phase	Completion

## TOPICS OF INTEREST

The annual audit planning process continually identifies and reviews topics to consider in future Audit Plans. The Audit Unit maintains an inventory of potential audit topics. The list below identifies a selection of potential topics that have significant interest at this time and the Audit Unit is monitoring. These topics are broad and may be the subject of more than one audit. This list is not exhaustive, and new and emerging topics are also considered in each annual planning cycle. Future Audit Plans may also include follow up audits to verify and assess the Ministry's progress in relation to previous audit findings, conclusions and recommendations.

### Potential future audit topics

Bullying and harassment	Contractors
Cumulative effects	Fatigue
Haulage systems	Health and safety in the exploration industry
Highwall safety	Placer mining
Qualified professionals and persons	Security for major mines
Water management	Water treatment
Worker Training	Workplace psychological safety

If you have a topic you would like the Audit Unit to consider, or if you have an interest in any of the topics listed above, please [contact us](#).