



REPORT Forest Certification



BC Timber Sales—Okanagan Columbia Business Area—2015 CSA Z809 Audit

In August 2015, an audit team from KPMG Performance Registrar Inc. (KPMG PRI) carried out a CSA Z809 re-certification audit of BC Timber Sales – Okanagan Columbia Business Area (BCTS TOC) operations under the Okanagan SFM plan. This Certification Summary Report provides an overview of the process and KPMG's findings.

Description of the BCTS Okanagan Columbia Defined Forest Area

The Okanagan defined forest area (DFA) is located in the Okanagan Timber Supply Area (TSA) in the vicinity of the towns of Vernon, Kelowna, and Penticton, BC. In addition to BCTS, Tolko, Gorman Bros. and the Westbank First Nation are signatories to the Okanagan SFM plan. Various non-signatory licensees (some of whom are certified to other SFM standards) also have operations within the Okanagan TSA. BCTS has a total AAC apportionment of 628,402 m³/year within in the Okanagan TSA, which equates to a prorated forest area under management of 315,550 hectares.

Scope of Certification

The scope of the BCTS Okanagan-Columbia Business Area's certification includes forestry operations on Crown forest land including planning and performance on active and completed timber sales as well as SFM system conformance by individual participating BCTS licensees, permittees and contractors (LPCs) within the Okanagan DFA.

The BCTS TOC CSA Z809 certification was originally granted on April 8, 2008, and is valid until September 15, 2018.

Audit Scope

The audit was conducted against all of the requirements of the CSA Z809-08 standard, including those related to:

- The public participation process;
- Development and maintenance of the SFM plan;
- Monitoring of SFM performance, and;
- Implementation of the various management system components (e.g., training programs, operational controls, monitoring, inspections, and internal audits.) that are required under the CSA Z809 standard.

The Audit

- **Audit Team** – The audit was led by Dave Bebb, RPF, EP(EMSLA). He was joined by Yurgen Menninga RPF, EP(EMSLA). Dave and Yurgen are employees of KPMG PRI, and have conducted numerous forest management audits under a variety of standards including ISO 14001, CSA Z809, and SFI.
- **CSA Z809 Re-certification Audit** – The audit included an off-site review of selected SFM system documents and an on-site assessment the BCTS TOC implementation of their SFM system. Conclusions regarding conformance with the requirements of the standard were based on the collection of sufficient and appropriate audit evidence drawn from the following sources: (1) review of various SFM system procedures and records and responses to questionnaires sent to public advisory group (PAG) members and local First Nations, (2) interviews with a sample of BCTS staff and LPCs as well as PAG members, representatives of local First Nations and other stakeholders, and (3) visits to several field sites to evaluate conformance with the applicable requirements of the CSA Z809 standard.
- **Surveillance Audits** – Annual surveillance audits are conducted by the audit team to ensure that CSA Z809 requirements continue to be met.



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- **BCTS TOC Certification Representative** – Darcie Annesley, RFT, is the BCTS TOC Certification Standards Officer, and was the BCTS representative during the audit.

Audit Objectives

The following audit objectives were included within the scope of the audit:

- Determine conformance with requirements of the CSA Z809 standard;
- Evaluate the ability of the system to ensure that BCTS meets regulatory requirements;
- Evaluate the effectiveness of the system in ensuring BCTS meets its specified objectives, and;
- Identify opportunities for improvement.

These objectives were met.

Audit Conclusions

The audit found that the BCTS TOC SFM system:

- Was in full conformance with the requirements of the CSA Z809 standard included in the scope of the audit, except where noted otherwise in this report;
- Continues to be effectively implemented, and;
- Is sufficient to systematically meet the commitments included in the Operation’s environmental and SFM policy, provided that the system continues to be implemented and maintained as required.

As a result, a decision has been made to re-certify BCTS TOC to the CSA Z809 standard.

Good Practices

A number of good practices were identified during the course of the audit. Examples included:

- CSA Z809 Element 7.3.3 (regulatory compliance) – The audit found a high level of compliance with applicable regulatory and environmental management system requirements on the sites included in the 2015 audit sample.
- CSA Z809 Element 7.4.6 (operational controls) – The audit found that BCTS TOC had done a good job of working to address visual quality concerns on one harvest area, using small patch cuts and retention of large diameter trees to reduce visual impacts.
- CSA Z809 Element 7.4.6 (operational controls) – The audit found that BCTS TOC had done a good job of addressing stand level biodiversity concerns through a combination of wildlife tree patches, and the retention of scattered clumps of non-merchantable trees and stubs.
- CSA Z809 Element 7.4.6 (operational controls) – The audit field sample noted a number of examples of conservative riparian management, such as lakes, wetlands and larger streams being buffered from harvest areas by well sized timbered reserves, and smaller streams being protected through the establishment of machine-free zones within which the non-merchantable understory had been retained.

BCTS TOC 2015 Audit Findings	
Open non-conformities from previous audits	0
New major non-conformities	0
New minor non-conformities	2
Now opportunities for improvement	6

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.

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Follow-up on Findings from Previous Audits

At the time of this assessment there was one opportunity for improvement from previous audits—this related to a weakness in LPC self-inspections. No recurrence was noted at the 2015 audit, and as a result this OFI is closed.

New Areas of Nonconformance

A total of 2 minor non-conformities were however identified during the audit:

- CSA Z809-08 Elements 7.4.4 (SFM documentation): It was found that an LPC contractor was lacking key work documents on site.
- CSA Z809-08 Element 7.4.6: (operational controls) The audit observed a fuel slip-tank not adequately secured to a vehicle.

Corrective Action Plans

Corrective action plans designed to address the root causes of the non-conformities identified during the audit have been developed by BCTS TOC 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.

New Opportunities for Improvement

A total of 6 new opportunities for improvement were also identified during the audit, as follows:

- CSA Z809-08 Element 7.5 (checking and corrective action): The audit identified some isolated instances of weakness in monitoring of operational controls, including: pre-work not signed by a contractor, insufficient LPC self-inspections on a site, lack of clarity regarding timelines for BCTS inspections, and a completed block that would have benefitted from greater cross-ditching.
- CSA Z809-08 Element 7.4.3 (communication): Despite the requirement in the Okanagan Operations SFM Plan, external audit results for 2014-2015 were not included as an appendix in the annual SFM Plan monitoring report.
- CSA Z809-08 Element 7.3.5 (SFM plan): The current Okanagan Operations SFM Plan contains links to relevant information, including the Okanagan Timber Supply Area annual allowable cut rationale, however, this link was not correct and led to a different document.
- CSA Z809-08 Element 7.4.6: (operational controls) An inspection of a harvest block found that the LPC had created logging slash piles closer to standing timber than was permitted according to the TSL plan (note that these piles had yet to be burned, nor had the final inspection for the block been completed).
- CSA Z809-08 Element 6.1 (DFA-specific performance requirements): Despite generally meeting the requirements of the CSA Z809 Standard, the following isolated weaknesses



LPC foreman and BCTS representative discussing field practices around soil protection, biodiversity (understory retention and stubs), utilization, and riparian practices.

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were identified in the Tolko/BCTS/WFM Okanagan Operations SFM Plan relating to SFM indicators and targets:

- Target 1, regarding the maintenance of Biogeoclimatic Zones to the subzone level within the plan area, is of little value as a performance indicator as SFM Plan signatories' have little influence on the distribution of zones within the DFA.
- The target set for indicator 1.1.2 (Forest Area by type or species composition) relates to stand diversity at free growing, and does not include monitoring of mature stands, which limits the ability of the target to meet the intent of the indicator.
- The species-specific habitat area targets under indicator 1.2.2 are not currently based on the best science regarding habitat needs of the species listed. Also, the areas used for baseline data and related monitoring are limited, and may not accurately reflect the needs of species managed under the indicator.
- CSA Z809-08 Element 7.4.6 (operational controls): The audit found that a section of the ditchline on a recently constructed road had failed, resulting in a plugged culvert and a small amount of sediment input into an S4 stream Note: This incident occurred following the last inspection of this road by BCTS and may have been related to a recent storm event.

Focus Areas for the Next Audit

The following issues/topics have been identified as focus areas for the next audit:

- Implementation and effectiveness of the action plans developed by BCTS TOC to address the findings of this audit.
- Waste levels in lower piece size pine-leading BCTS TOC harvest blocks, in response to a concern raised by a PAG member (note: no logging waste concerns were observed during the 2015 audit)
- Progress in addressing the requirements of the new CSA Z809 Standard—the new standard is expected to be released in late 2015/early 2016.



An example of an LPC having to adapt to operational constraints. In this unit the operator could not safely reach into an area that was intended for harvest and therefore decided to leave it as a retention patch. As a result of this constraint the machines had to work in close quarters and in coordination with each other to do this effectively. Note the feller-buncher working in the shade at the bottom of the opening.

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