



# **Forest Operations Compliance Audit Compliance Action Plan Requirements**

**May 2, 2014**

## **Information Required in a Compliance Action Plan**

Once a forest operations compliance audit is complete, findings from the audit may support a conclusion of non-compliance with performance indicators being assessed. In such cases, a Compliance Action Plan will be required for each non-conformance. The purpose of the Compliance Action Plan is to facilitate the desired improvement of current operating practices. Licensees are free to use a format that best suit their needs, as long as the following information is clearly indicated in the plan:

1. An identification of the severity and scope of the non-conformance. The Licensee must address the findings in the audit report and provide an assessment of the occurrence of the non-conformance across the entire licence. The Licensee will develop a strategy for making that assessment, describe that strategy in its Compliance Action Plan, and submit it to the Audit Team Leader for review. Possible strategies for addressing this requirement include
  - analysis of existing records (e.g. internal audits),
  - sampling a sub-set of operations,
  - inspection of each operating area, or
  - a combination of any of the above.
2. An identification of any necessary corrective actions. This section should deal with the actions necessary to correct or mitigate the results of the non-compliance. A strategy will be developed by the Licensee and submitted for review by the Audit Team Leader.
3. An identification of any necessary preventative action requirements. This section should include actions necessary to prevent the future occurrence of the non-compliance issue. A strategy will be developed by Licensees and should be submitted for review by the Audit Team Leader.
4. Specify a timeline over which corrective and preventative actions will be completed. Timelines should be reflective of the risk of inaction. For example, a non-compliance dealing with soil erosion entering a watercourse should have a shorter timeline than one indicating a problem with harvest waste.

Every Compliance Action Plan must be agreed to by the Audit Team Leader before Licensees implement them. Before a Team Leader will agree with the plan, Team Leaders may prescribe modifications to ensure the proposed strategies will effectively address the correction and prevention of the non-compliance issue. The intent is that Licensee's take accountability for the Compliance Action Plan and the Audit Team Leaders review the plan to ensure it contains the elements specified in the Regulation and that it addresses the non-conformance.

## Follow-up on Compliance Action Plans

Compliance Action Plans will have a follow-up assessment on their implementation and success. Follow-up assessments can either be done during subsequent audits or as a separate exercise. In most cases, corrective action plans that deal with environmental issues will be assessed after the plan was implemented to ensure the problem was dealt with and there is no longer any risk to the environment. Alternatively, preventative action plans may be assessed during subsequent audits.

If a Compliance Action Plan assessment indicates the plan was properly implemented but did not achieve the desired results, the Audit Leader can prescribe additional requirements and ask the Licensee to develop a subsequent Action Plan to better address the issue. In instances where the Action Plan was not implemented properly, a monetary penalty will follow and a more onerous Action Plan can be prescribed.

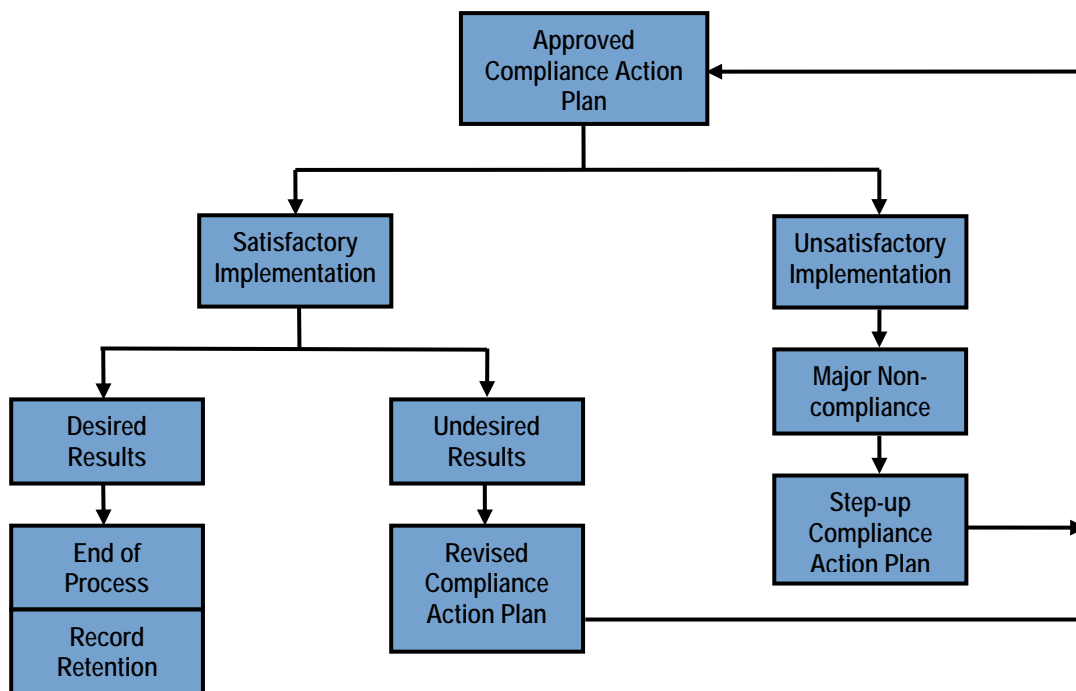


Figure 1. Compliance Action Plan implementation assessment process.