

SOP Title: Registered Forestry Professional Due Diligence Practise of Department Staff

SOP No: 2008 - 1

Date: August 1, 2008

Purpose:

To outline reasonable due diligence expectations for department staff reviewing and approving validated forest management submissions required by the *Alberta Forest Management Planning Standard (FMPS), Annex 2 – Role of Regulated Forestry Professionals (RFP) in Forest Management*.

Responsibilities:

I. Professionalism: Alberta believes that RFPs will act in the professional manner described in the *Code of Ethics (Code) and Standards of Practise of each College.*

A RFP is responsible and accountable for displaying conduct that his/her peer group of professionals would characterize as being ethical. Although ethics are subjective and abstract in nature, detailed guidance as to what ethical behaviour encompasses is embodied in each College's Standards of Practise. Meeting the obligation for professional conduct requires that RFPs display honest, respectful and dignified behaviour. RFPs are advised to be familiar with the Code.

II. Accuracy: Professional work is completed with due diligence and is accurate.

This principle applies to RFPs submitting work as well as those reviewing and approving work. The definitions of the terms accurate and due diligence are included in the definitions attached. Submissions that are accurate and prepared with due diligence enable unencumbered review processes. Submitting RFPs demonstrate accuracy by completing checklists. Reviewing RFPs demonstrate due diligence by sampling to assess the accuracy of checklists.

Procedure:

1) Document Submissions:

The FMPS - Annex 2 lists the forest management documents that RFPs shall validate, and includes the type of review (*acceptance or appraisal*) Alberta will conduct to approve the document. Checklists shall normally be used to declare the accuracy of submissions in instances where submissions are complex (e.g. the land base description in an FMP). In instances of simpler submissions (e.g. reforestation reports), validation by an RFP is sufficient because it assures accuracy. Table 1 summarizes the key factors related to each submission. These checklists are available at the following web address:

<http://www.srd.alberta.ca/ManagingPrograms/ForestManagement/RegulatedForestryProfessionals.aspx>

2) Document Reviews

Timelines Alberta will use for the two types of document review are as follows:

- a. *Appraisal* – Document approvals are issued where Alberta’s review determines the document acceptable. Reviews shall be completed within 30 working days of being received. Where reviews reveal no significant issues in the opinion of the reviewer, approvals shall be issued within that same 30 day period.

Note: Forest management plan reviews shall be completed within 100 working days of being received. (See *FMPS – Interpretive Bulletin – Forest Management Planning Roles, Responsibilities and Approval Authorities*).

- b. *Acceptance* - Documents are deemed approved on the date that Alberta recognizes receipt of the work. Alberta shall notify the company recognizing receipt within five working days of submission unless Alberta finds the document incomplete or inaccurate. Where this occurs, the document is returned for correction and resubmission. The review timelines for the re-submission shall be the same as for the initial submission. The extent of the review may vary by submission and document type.

3) Variances from Standards or Plans

Only the manager accountable for document approval shall authorize variances from standards or plans (see Table 1). Changes to approved plans (e.g. Annual Operating Plans (AOP)) are to be approved by the accountable manager. Amendment mechanisms exist in the operating ground rules to address changes in AOP's.

4) Alberta's Review

For all submissions, reviewers shall first assess completeness and then check for significant errors. The extent of the review is to be determined through consultation between the reviewing RFP and the accountable manager.

Submissions submitted for acceptance are generally simple submissions of information (e.g. regeneration surveys). The standards for such submissions are normally included in various government policies (e.g. Regeneration Survey Manual). Validation conveys assurance of submission accuracy and thus the reviewing RFP need only check to see that the submission is validated and/or any checklist required states that all requirements have been met.

Documents requiring appraisal are more complex. The reviewing RFP shall prepare and file a brief report as per the following guidance:

- a. briefly document the rationale for selecting the factors to evaluate
- b. describe the results of the assessment the accuracy of information submitted for factors selected;
- c. in consultation with the accountable manager determine the outcome of the appraisal (management decision); and
- d. briefly document the appraisal results and decision rationale, including reviewer names and dates, and retain on file.

Validated Checklists

- a. Where a review of the submitting RFP's validated checklist finds it incomplete, the reviewing RFP shall return the checklist and the submission to the submitting RFP for completion and resubmission.
- b. Where the submitting RFP's validated checklist indicates the submission is complete, the reviewer shall spot check the submission to confirm its completeness.

- c. Where the submitting RFP's validated checklist indicates the submission is incomplete but the reviewer determines the explanations for this are acceptable, the reviewer shall recommend approval to the accountable manager.
- d. Where the reviewer determines the explanations for the incomplete submission are not acceptable, the reviewer shall return the submission for correction and resubmission. For some 'acceptance' submissions (i.e. regen survey tally cards, ARIS), re-submission may not be feasible so action plans under the Forest Operations Monitoring Program, or if serious, enforcement may be necessary.

5) Conduct

The reviewing RFP shall carry out meaningful discussions with the submitting RFP on any questions or concerns regarding the submission. Where issues cannot be resolved between the reviewing and submitting RFPs, the accountable manager shall resolve the issue with the responsible manager of the submitting agency.

6) Forest Operations Monitoring Program (FOMP)

The Department shall use the FOMP to monitor the execution of approved AOPs and to verify the accuracy of submissions.

7) Launching Complaints with Regulatory Colleges

Where the reviewing RFP believes a submitting RFP is not practicing in a professional manner, the following shall apply:

- a. The reviewing RFP shall review the Code of Ethics and Standards of Practice for the responsible College to ensure complete understanding of the obligations for professionals practicing forestry in Alberta.
- b. The reviewing RFP may launch a complaint to the responsible professional forestry College as an individual; or
- c. The reviewing RFP may recommend the department launch a complaint to the responsible professional Forestry College.

Where items b or c. (above) are chosen, the reviewing RFP shall treat this privileged information in a confidential manner and immediately seek guidance from the Senior Forester, Enforcement, Forest Management Branch.

The Senior Forester, Enforcement shall consult the Senior Manager in Forest Management Branch who is the content expert on the issue to ensure that the standards or plans are being interpreted correctly. For example, concerns with an Annual Operating Plan shall be referred first to the Senior Manager of Forest Operations in FMB.

Should the Senior Forester, Enforcement recommend the department launch a complaint to a College, the accountable Senior Manager in FMB and the Area Program Manager will review the recommendation. The managers shall jointly agree to the department's most appropriate course of action.

Where the managers agree to launch a complaint, a letter addressed to the responsible College shall be prepared for signature by the Executive Director, FMB.

Attachments:

1. Alberta Definitions
2. Table 1 – Summary of Forest Management Submissions and Review

Supporting References:

Alberta Forest Management Planning Standard – Annex 2

Records:

n/a

Authorities:

Alberta Forest Management Planning Standard

Written by: Robert Stokes

Approved by: Original Signed
D. (Doug) A. Sklar, Executive Director
Forest Management Branch

Date to be reviewed: April 1, 2011

ALBERTA DEFINITIONS

Term	Definition in the context of this SOP
Accountable Manager	The employee of Alberta with delegated approval authority for applicable standards or submissions.
Accurate	<ul style="list-style-type: none"> - Is free of errors or omissions and is submitted on time. It is recognized that mistakes will occur occasionally. Prompt notification and correction of mistakes when discovered is the appropriate action. - Deviates from the Standard only within acceptable limits, as specified by Alberta. Technical standards and tolerance limits in existing Acts, regulations, policies, directives, guidelines, ground rules and approved plans will be amended from time to time by Alberta. - Contains sufficient information to be readily understood. Complete documentation and explanation of work is demonstrated.
Accuracy	The characteristic of being accurate and prepared with due diligence
Submission	All information provided in any format (e.g. digital, hard-copy, multi-media) prepared by or for the proponent to fulfill a regulatory, policy or other requirement, obligation or commitment to Alberta.
Due Diligence	<ul style="list-style-type: none"> - Taking and documenting steps to ensure the desired outcome is achieved or the chances of a negative consequence or outcome are minimized. - Ensuring completeness, correctness, consistency and repeatability. - Demonstrating how conclusions were reached. - Using mechanisms such as but not limited to checklists and standard operating procedures, to demonstrate that appropriate procedures were followed and to ensure that no relevant steps or considerations were missed. - Keeping and maintaining appropriate files and filing systems as well as document retention policies and practices.
Meaningful Discussion	Discussion in good faith, with honest communication and an open exchange of relevant information before decisions are made. Information has been presented, it is understood by the recipient, and the recipient's questions, concerns or issues have been addressed.

Table 1 - Summary of Forest Management Submissions and Review *					
Submission Type	Appraisal or Acceptance (appraisal for an FMP is 100 working days, 30 for appraisal, 5 for acceptance)	Submission Checklist/Form	Standards	Approving Manager	Comments
FMP	Appraisal	Senior RFP, Responsible RFP checklists	FMPS	Exec Director FMB	Validating RFP's can rely on complete checklist for documentation
Yield projections	Appraisal	Responsible RFP checklist	Section 4 of Annex 1 of FMPS	Senior Manager Resource Analysis Section FMB	
Vegetation Inventory	Appraisal	Responsible RFP checklist	Section 2.0 of Annex 1 of FMPS	Senior Manager Resource Analysis Section FMB	
Landbase Description	Appraisal	Responsible RFP checklist	Section 3.0 of Annex 1 of MPS	Senior Manager Resource Analysis Section FMB	
Silviculture Strategies	Appraisal	Responsible RFP checklist	Section 5.9.1 and 5.9.2 of Annex 1 of FMPS	Senior Manager Reforestation Section FMB	
Forecasting	Appraisal	Responsible RFP checklist	Section 5.0 of Annex 1 of FMPS	Senior Manager Forest Planning Section FMB	
Harvest planning	Appraisal	Responsible RFP checklist	Section 5.7 and 6.0 of annex 1 of FMPS	Senior Manager Operations Section FMB	
Annual Monitoring reports	Acceptance	Template under development	As required by approved FMP and/or operating groundrules for the area	Area Manager	
Stewardship Reports	Appraisal	Template under development	As required by approved FMP and/or operating groundrules for the area	Senior Manager Forest Planning Section FMB	
Annual Operating Plan	Appraisal	AOP Checklist	Operating Ground Rules, Section 3.5	Area Forestry Program Manager	Senior Manager, Operations Section FMB must approve ground rule variances. Major AOP amendments after the plan is approved require Area Forestry Program Manager approval. Minor Amendments are notification only. Details found in the ground rules.
General Development Plan	Appraisal	AOP Checklist	Operating Ground Rules, Section 3.3	Area Forestry Program Manager	
Compartment Assessment	Appraisal	AOP Checklist	Operating Ground Rules, Section 3.2	Senior Manager Forest Planning	
Final Harvest Plan	Acceptance	FHP Checklist	Operating Ground Rules, Section 3.4	Area Forestry Program Manager	
Road & Fire Control Plan	Acceptance	AOP Checklist	Operating Ground Rules, Section 11.2, and 10.3	Area Forestry Program Manager	
Reforestation Program	Acceptance	AOP Checklist	Operating Ground Rules, Sections 8.1 and 8.2	Area Forestry Program Manager	

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Scaling Population Plan	Appraisal	Form 262 Checklist	TM Form 262	Senior Manager Timber Production, Auditing and Revenue Section	
Timber Production audits	Appraisal	As addressed in Letter of Understanding for audit	Scaling Manual and Section 116.2 of the TM Regulation	Senior Manager Timber Production, Auditing and Revenue Section	Various component to be validated by RFP or company accounting representatives
Community Timber Manufacturer Certified Statement of Operations	Acceptance	Checklist for certified statement	Appended to Checklist	Senior Manager Timber Production, Auditing and Revenue Section	
Reforestation Data - ARIS Submission	Appraisal	ARIS RFP Validation Statement with digital ARIS submission	ARIS Industry Operations Manual - Mandatory Elements	Senior Manager Reforestation	Submission is digital on May 15 annual, but signed Validation Letter must be submitted at the same time.
Regeneration Survey Tally Cards	Acceptance	Regen Survey Cover Sheet	Appendix 7 of Survey Manual	Area Forestry Program Manager	
Field Operations Inspection Reports	Acceptance	Monthly summary forms and Field inspection forms for individual cutblocks and roads.	See Appendix 1 and 2 of FMB Directive 2006-04 (Forest Operations-Compliance and Enforcement)	Area Forestry Program Manager	Companies can develop their own forms as long as the information in 2006-04 is captured.
Herbicide Reports	Acceptance	Herbicide Checklist	Herbicide Reference Manual	Area Forestry Program Manager	
Partial Cutting Proposals	Appraisal	Partial Cut Checklist (under development)	Partial Cutting Guidelines - supplement to the Alberta Forest Management Planning Standard	Area Forestry Program Manager	Covers submissions for commercial thinning, understorey protection, Firesmart, and other partial cutting (ie. seed tree reforestation)
* Note that this list varies from the listing in Annex 2 but are the currently relevant forestry submissions.					