



MANAGEMENT OF THE CONSERVATION LANDS PROGRAM

An independent audit report

May 2021



The Honourable Raj Chouhan
Speaker of the Legislative Assembly
Province of British Columbia
Parliament Buildings
Victoria, British Columbia
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Dear Mr. Speaker:

I have the honour to transmit to the Speaker of the Legislative Assembly of British Columbia the report *Management of the Conservation Lands Program*.

We conducted this audit under the authority of section 11(8) of the *Auditor General Act*. All work in this audit was performed to a reasonable level of assurance in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001—Direct Engagements, set out by the Chartered Professional Accountants of Canada (CPA Canada) in the *CPA Canada Handbook—Assurance*.



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Auditor General of British Columbia
Victoria, B.C.
May 2021

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The Office of the Auditor General of British Columbia would like to acknowledge with respect that we conduct our work on Coast Salish territories. Primarily, this is on the Lkwungen-speaking people's (Esquimalt and Songhees) traditional lands, now known as Victoria, and the WSÁNEĆ people's (Pauquachin, Tsartlip, Tsawout, Tseycum) traditional lands, now known as Saanich.

AUDIT AT A GLANCE

Why we did this audit

- British Columbia has the greatest diversity of native fish and wildlife in Canada.
- The Conservation Lands Program contributes to government's strategy to maintain diversity through conserving some of the most biologically productive estuaries, wetlands and grasslands in the province.
- If the program is not managed effectively, habitats that it conserves could be harmed, including the fish and wildlife that depend on them.

Objective

To determine whether the Ministry of Forests, Lands, Natural Resource Operations and Rural Development has effectively managed the Conservation Lands Program to conserve important habitat for the benefit of significant fish and wildlife species.

Audit period: We focused on the period 2016–2020 but also assessed older documents and data as applicable to our work.

Conclusion

We concluded that the ministry had not effectively managed the Conservation Lands Program to conserve important habitat.

We made 11 recommendations mainly focused on:

- providing strategic direction
- increasing direction to staff to collaborate with Indigenous peoples
- revising all outdated management plans for wildlife management areas (WMAs)
- resolving threats to the most at-risk conservation lands
- improving tracking of inventory
- monitoring and reporting publicly on the effectiveness of the program

The ministry has accepted all 11 recommendations.

What we found

Strategic direction

Species and habitats identified

- Species identified include species at risk, migratory birds and culturally important species
- Some habitats identified (e.g., wetlands) support high species diversity

Habitats not ranked by ministry

- Conservation partners, not ministry, ranked habitats by priority
- Only 1 of 8 regions had ranked habitats for the program

[Recommendation 1](#)

Lack of overall direction

- No provincial strategic plan
- Goals not renewed for over 30 years
- Non-administered conservation lands lacked direction on future purpose

[Recommendation 2](#), [Recommendation 3](#)

What we found (continued)

Strategic direction (continued)

Lack of direction on collaboration with Indigenous peoples

- Limited direction to staff to collaborate with Indigenous peoples specifically on the program
- Only 3 of 8 regions provided specific direction to collaborate with Indigenous peoples on the program

[Recommendation 4](#)

Managing conservation lands

Conservation lands designated as WMAs

- 9 WMAs designated in 4 of 8 regions (2010–2018)
- 31 WMAs designated in 7 of 8 regions (since inception)

Most WMA plans not current or approved

- Average age of WMA plans was almost 19 years
- About 70% of plans not approved
- 3 WMAs didn't have WMA plans

[Recommendation 5](#)

Risks to conservation lands from human activity

- Hundreds of unauthorized activities had occurred on conservation lands
- Activities included motor vehicle use, dogs off-leash, harvesting and dumping
- Limited strategies for unauthorized use
- Some incompatible overlaps between grazing tenures and conservation lands

[Recommendation 6](#), [Recommendation 7](#)

Infrastructure being maintained

- All 8 regions reported on infrastructure
- Record-keeping lacking, including on dams managed by Ducks Unlimited Canada

[Recommendation 8](#)

Program inventory, monitoring and reporting

Inadequate inventory of conservation lands

- Inventory data inconsistent and not readily available
- Number of non-administered conservation lands not accurate

[Recommendation 9](#), [Recommendation 10](#)

Program effectiveness not monitored or reported

- Ministry lacked performance measures and targets to assess progress
- Some reporting on site-level conservation work

[Recommendation 11](#)

After reading the report, you may want to ask the following questions of government:

1. How much should government rely on non-profit organizations to secure and manage conservation lands?
2. How will the ministry reduce unauthorized activity on the most at-risk conservation lands?
3. How will government collaborate with Indigenous peoples through this program to achieve shared conservation outcomes?

BACKGROUND

The Conservation Lands Program

The Conservation Lands Program was established over 50 years ago. The program aims to conserve and manage important habitat for the benefit of significant fish and wildlife species. It is one component of the government's overall strategy in this area. Lands conserved through the program are located throughout the province and include two internationally designated wetlands, and habitat critical to the Pacific Flyway for migratory birds (from the Arctic to the west coast of Mexico and the Rocky Mountains to the Pacific Ocean). Conservation lands also help reduce the effects of climate change, by storing carbon, reducing flood risks and contributing to corridors for animal movement.

Since 2011, provincial and regional staff at the Ministry of Forests, Lands, Natural Resource Operations and Rural Development have been responsible for the program. Staff from all eight regions (see [Appendix C](#)) in the province deliver the program, supported by provincial staff from the Wildlife and Habitat Branch. The program's 2020/21 provincial budget was about \$1,029,000 (excluding salaries, in-kind donations and funding contributed by the partners).

Key aspects of the program

Securing lands for conservation

Managed by the ministry, administered conservation lands include private lands that the ministry has acquired or leased, Crown lands that have been transferred to the ministry, and lands that have been designated as wildlife management areas (WMAs). Most non-administered conservation lands are temporarily conserved under the *Land Act*. These lands limit certain uses or require that ministry staff be contacted about proposed changes in use.

The Conservation Lands Program aims to designate conservation lands as WMAs because this designation provides the ministry with the best regulatory tools for conserving and managing the lands. As of 2019, the ministry estimated that the program had secured about 260,000 hectares of wildlife management areas and other administered conservation lands, and approximately 640,000 hectares of non-administered conservation lands.

Reliance on partnerships

The program relies on provincial and regional partnerships to secure and manage conservation lands. Their importance has steadily increased since the program started. Provincial partners include Ducks Unlimited Canada, The Nature Trust of BC, the Habitat Conservation Trust Foundation, the Nature Conservancy of Canada, and the Canadian Wildlife Service of Environment and Climate Change Canada. Regional partners include First Nations governments, municipal and regional governments, local conservation organizations and Fisheries and Oceans Canada (West Coast region).

OBJECTIVE

The objective of our audit was to determine whether the Ministry of Forests, Lands, Natural Resource Operations and Rural Development has effectively managed the Conservation Lands Program to conserve important habitat for the benefit of significant fish and wildlife species.

Scope

Our audit covered the entire province. We focused on the ministry's management of the program from 2016 to 2020, but we also assessed older documents and data that still applied to the ministry's current work. We evaluated the program's strategic direction, the ministry's management of conservation lands, and whether the ministry had monitored and reported on the program's effectiveness. We did not assess the work of the conservation partners.

[Learn more about the audit criteria.](#)

[Learn more about how we did this audit.](#)

CONCLUSION

The ministry has not effectively managed the Conservation Lands Program. While the ministry has identified the species and habitats it aims to conserve and has designated conservation lands as wildlife management areas, we found that:

- the program lacked strategic direction
- most wildlife management areas lacked current or approved management plans
- the regions had not ensured that activities on administered conservation lands were compatible with management objectives
- the inventory of conservation lands was inaccurate
- the ministry had not monitored and reported publicly on the effectiveness of the program

FINDINGS AND RECOMMENDATIONS

Strategic direction

Strategic direction communicates support for a program and helps establish it as a priority. Direction is generally communicated through policy, guidance or a strategic plan. A strategic plan identifies goals, objectives, outcomes, performance measures and targets for a program.

Ministry had identified species and habitats

What we looked for

We assessed whether the Ministry of Forests, Lands, Natural Resource Operations and Rural Development had identified the species and habitats it aims to conserve through the Conservation Lands Program.

[Learn more about the audit criteria.](#)

What we found

The ministry had identified the species and types of habitats it aims to conserve, including regionally or internationally significant fish and wildlife species and their habitats. Habitats conserved through the program support:

- sensitive, vulnerable or at-risk species
- critical life-cycle phases (such as spawning, rearing, nesting and winter feeding)
- species migration routes or other movement corridors
- unusually high species productivity or diversity

Species identified in wildlife management areas and other administered conservation lands include species at risk, such as the spotted owl, marbled murrelet, American badger, California bighorn sheep, grizzly bear, northern leopard frog and white sturgeon. Important habitats identified on these lands include internationally significant migratory bird habitat, habitats with high species diversity, and important waterfowl habitat.

Why this matters

Identifying the species and habitats to conserve focuses the program's conservation work, which is especially important in B.C. because it has the greatest diversity of native fish and wildlife in the country.

Ministry had not ranked habitats by importance

What we looked for

We assessed whether the ministry had ranked important habitats by priority for the program.

[Learn more about the audit criteria.](#)

What we found

The ministry had not ranked important habitats by priority for the program. Only one (Omineca) of eight regions had ranked important habitats for the program, and three regions (West Coast, South Coast and Thompson Okanagan) had completed some initial work in this area.

Despite the ministry's lack of work in this area, a process for ranking habitat for the Conservation Lands Program was established through the Conservation Lands Partner Program (CLPP), a partnership between the ministry, the Ministry of Environment and Climate Change Strategy, the Canadian Wildlife Service and several non-governmental organizations. The CLPP facilitates the securing of provincial Crown lands for the Conservation Lands Program. To help rank Crown land for securing, the CLPP identified the regions with the highest-priority habitats, using a provincial map developed by the conservation partners. The ministry's priorities were not included in this map.

Why this matters

There is a risk that by not prioritizing habitats the ministry is not focusing its limited time and resources effectively.

Recommendation

We recommend that provincial and regional staff:

- 1 work with conservation partners to establish a shared list of provincial and regional priority habitats for the program**

[See the response from the auditee.](#)

Ministry direction lacking

What we looked for

We assessed whether the ministry had communicated direction to provincial and regional operations for implementing the program. We also looked at whether the ministry had established a strategic plan to support the program, including goals, objectives, outcomes, performance measures and targets.

[Learn more about the audit criteria.](#)

What we found

Provincial direction for the program was lacking. The ministry had not:

- renewed the program's vision, mission and goals for over 30 years
- established a provincial strategic plan for the program

Most of the regions also lacked regional strategic plans for the program. Only two of the eight regions (West Coast and Omineca) had established regional plans.

In addition, there was a lack of provincial and regional direction about the purpose of non-administered conservation lands. Non-administered conservation lands are often used to temporarily secure Crown land before they transition to future wildlife management areas, but not all of these lands have been set aside for this purpose (e.g., many were established before wildlife management areas existed). There was also a lack of direction regarding which of these non-administered conservation lands the ministry aims to maintain for wildlife management areas.

Why this matters

Strategic direction is necessary for the successful implementation of a program. For example, there is a risk that the regional strategic plans will not be fully implemented because of the overall lack of provincial direction for the program.

Recommendation

We recommend that provincial and regional staff:

- 2 work with conservation partners, including Indigenous peoples, to develop and implement a provincial strategic plan for the program, including goals, objectives, outcomes, performance measures and targets**

[See the response from the auditee.](#)

Recommendation

We recommend that the ministry:

- 3 clarify the purpose of non-administered conservation lands and provide direction to the regions regarding how these lands should be secured and maintained**

[See the response from the auditee.](#)

Ministry direction on collaborating with Indigenous peoples lacking

What we looked for

The ministry committed to working collaboratively with Indigenous peoples to improve habitat conservation through its 2019 Ministry Action Plan. We assessed whether the ministry had supported staff to collaborate with Indigenous peoples when securing and managing conservation lands.

We considered whether the ministry had:

- provided relevant training and guidance
- communicated direction to staff to collaborate with Indigenous peoples on the securement and management of conservation lands

[Learn more about the audit criteria.](#)

What we found

The ministry has not supported staff to collaborate with Indigenous peoples when securing and managing conservation lands.

The ministry has provided relevant training and guidance for program staff. But we found a lack of specific direction to staff to collaborate with Indigenous peoples on the program.

At a provincial level, only limited direction has been communicated through the *Together for Wildlife Strategy* (2020), which stated that the ministry “...will strengthen ties with Indigenous governments, conservation partners, resource industries and stakeholders to better secure and manage conservation lands to achieve wildlife objectives.”

Regionally, only three of eight regions (West Coast, Omineca and Kootenay Boundary) had directed staff to collaborate with Indigenous peoples specifically on the program.

While the ministry had only provided limited direction specific to the program, we saw some examples of regional staff who had worked collaboratively with Indigenous peoples to manage conservation lands in the West Coast, South Coast, Omineca, Skeena and Thompson Okanagan regions.

Why this matters

The lack of specific direction to staff to collaborate with Indigenous peoples on the program may impact the ministry achieving its goal to work collaboratively with Indigenous peoples to improve habitat conservation.

Recommendation

We recommend that the ministry:

- 4 include specific direction for staff to collaborate with Indigenous peoples in the provincial strategic plan for the program**

[See the response from the auditee.](#)

Managing conservation lands

The ministry's priority for the management of administered conservation lands is to conserve important fish and wildlife habitat. To support the management of these lands, the ministry can establish regulations and orders that prohibit or restrict activities that may harm wildlife or habitat. The ministry also permits some activities and uses on conservation lands, as long as they are compatible with its management objectives. For example, the ministry generally allows activities such as hiking, hunting, fishing, wildlife viewing, scientific research and education, and the traditional activities of Indigenous peoples. Also, the ministry sometimes permits resource use in conservation lands, such as agriculture, grazing, forestry and mining.

The Conservation Lands Program aims to designate conservation lands as wildlife management areas (WMAs) because this designation provides the best regulatory tools for conserving and managing the land. WMAs are established under the *Wildlife Act* and consist of one or more conservation lands, including private lands that the ministry has acquired or leased, Crown lands that have been transferred to the ministry and non-administered conservation lands. The WMAs conserved through the program include internationally recognized wetlands, important migratory bird habitat (Pacific Flyway) and habitat for species at risk.

Ministry had designated conservation lands as WMAs

What we looked for

We assessed whether the ministry had designated conservation lands as wildlife management areas (WMAs) between 2010 and 2020.

[Learn more about the audit criteria.](#)

What we found

The ministry had designated conservation lands as WMAs. Nine WMAs were designated between 2010 and 2018, in four of the eight regions (South Coast, West Coast, Thompson Okanagan and Omineca). Since the program was established, government has designated 31 WMAs located in seven of the eight regions (none in Northeast) (See [Appendix D](#)). The WMAs include a total of approximately 245,800 hectares, which accounts for about 90% of the total area secured as administered conservation land.

Why this matters

Designating conservation lands as WMAs is a key program objective.

Regions had management plans, but most WMA plans were not current or authorized

What we looked for

We assessed whether the regions had:

- developed and implemented management plans for administered conservation lands
- ensured that the plans were current and approved

[Learn more about the audit criteria.](#)

What we found

The regions had management plans for most administered conservation lands, but the majority of the wildlife management area (WMA) plans were not current or approved.

The regions had developed and implemented plans for 209 of the 235 administered conservation lands, including the WMAs. Regional staff update these plans every three years and submit them for approval to the Habitat Conservation Trust Foundation (HCTF), a non-governmental organization that manages endowments provided by the province to support the ongoing management of conservation lands. The plans include goals and objectives for the property, such as managing invasive species and maintaining signage.

The regions had also developed separate management plans for wildlife management areas. Unlike the HCTF plans, these plans include detailed management direction. Regional staff who authorize activities in WMAs have generally relied on these plans. WMA management plans are usually developed with input from Indigenous peoples, stakeholders and the public.

Most of the WMA management plans were not current, and many had not been approved. Of the 31 WMAs that had been designated in the province, three WMAs (in the West Coast and Thompson Okanagan regions) did not have plans. The average age of the plans for the remaining 28 WMAs was almost 19 years, and about 70% of them had not been approved.

Why this matters

WMA management plans provide the detailed management direction that decision-makers need to guide their decision-making. Only current management plans can reflect current risks to conservation lands. Having no management plan or a plan that hasn't been approved can also reduce the ministry's ability to respond to non-compliance issues on conservation lands.

Recommendation

We recommend that the regions:

- 5 ensure that all wildlife management areas have current and approved management plans**

[See the response from the auditee.](#)

Conservation lands at risk from human activity

What we looked for

We assessed whether the regions had ensured that activities on administered conservation lands were compatible with management objectives. These management objectives are generally included in management plans, strategic planning documents (e.g., land and resource management plans) or legal agreements (e.g., lease agreements). To determine whether the regions had met their management objectives, we assessed whether they had strategies in place to address incompatible activities and had assessed which conservation lands were most at -risk. We also considered the extent of incompatible activities that had taken place on conservation lands.

[Learn more about the audit criteria.](#)

What we found

The regions had not ensured that activities on administered conservation lands were compatible with management objectives. We found that the regions had limited strategies available to address the unauthorized use of conservation lands and had not assessed which conservation lands were most at -risk. Furthermore, the ministry had authorized livestock grazing that was incompatible with the management objectives for conservation lands. While the ministry had established a project to help resolve issues related to livestock grazing, we found that the project had not met all of its objectives.

Unauthorized use—Regional staff from six of the eight regions reported unauthorized use on conservation lands between 2016 and 2020. Unauthorized uses included motor vehicle use, mountain biking, allowing dogs to be off-leash, camping, illegal harvesting, vandalism, damaging habitat, and dumping.

Livestock grazing—On some conservation lands there were overlaps between grazing tenures and conservation lands. Some of these lands are leased to the provincial government by a non-governmental organization conservation partner. In 2014, the ministry (with the conservation partners and other stakeholders) established the Overlap of Conservation Lands and *Range Act* Tenures Project to help resolve this issue. But the project has not yet met all of its objectives, and some grazing conflicts remain unresolved. The project has not:

- resolved all existing incompatible overlaps between administered conservation lands and *Range Act* tenures
- developed provincial policy and operational procedures regarding where and under what conditions *Range Act* tenures should be issued on administered conservation lands

Why this matters

The absence of regional strategies to manage the unauthorized use of conservation lands increases the risk that these activities will persist, potentially harming the important habitats the ministry aims to conserve. Our analysis of data provided between 2009 and 2020 by the ministry's Compliance and Enforcement Branch and the Conservation Officer Service (Ministry of Environment and Climate Change Strategy) indicated that hundreds of unauthorized activities had occurred on conservation lands. Also, the ministry's authorization of livestock grazing on conservation lands may impact important habitats.

Recommendation

We recommend that provincial and regional staff:

- 6 work with the Compliance and Enforcement Branch and the Conservation Officer Service to develop a strategy to reduce unauthorized use in the most at-risk administered conservation lands**

[See the response from the auditee.](#)

Recommendation

We recommend that the ministry:

- 7 complete the Overlap of Conservation Lands and *Range Act* Tenures Project, including resolving all incompatible overlaps and developing direction regarding where and under what conditions *Range Act* tenures should be issued on administered conservation lands**

[See the response from the auditee.](#)

Regions mostly maintaining infrastructure

What we looked for

We assessed whether the regions had maintained infrastructure on conservation lands, including signage, kiosks, fencing, gates, viewing platforms, boardwalks, trails, stairs, bridges and water control structures. To evaluate this criterion, we considered whether the regions had kept records of their infrastructure and had reported on its maintenance.

[Learn more about the audit criteria.](#)

What we found

The regions had maintained infrastructure on conservation lands, but their record-keeping needed improvement.

All eight regions had recently reported on their maintenance of infrastructure through the Habitat Conservation Trust Foundation's Conservation Lands Operations and Management Program.

But most regions had not kept a record of their infrastructure on conservation lands, including dams managed by Ducks Unlimited Canada. The ministry's dam safety officers and natural resource officers regulate the dams managed by Ducks Unlimited Canada, but information on which dams are on conservation lands was not available.

Why this matters

It's important that the regions maintain a record of their infrastructure and report on its maintenance because if it is not adequately maintained this could result in harm to people, species and habitats. It could also damage neighbouring private land.

Recommendation

We recommend that provincial and regional staff:

- 8 develop and implement a system to track infrastructure on conservation lands, including the dams managed by Ducks Unlimited Canada**

[See the response from the auditee.](#)

Program inventory, monitoring and reporting

Monitoring and reporting on the progress of a program helps keep the ministry accountable and transparent, both for legislators and for the public. The ministry can also use monitoring information to inform its decisions about the program. Tracking program inventory helps the ministry monitor and report on its progress.

Inventory of conservation lands was inadequate

What we looked for

We assessed whether the ministry had an accurate inventory of conservation lands, including whether its data was consistent and readily available for Conservation Lands Program staff.

[Learn more about the audit criteria.](#)

What we found

The ministry lacked an accurate inventory of conservation lands. Its inventory data was not consistent or readily available.

The ministry used three key sources of inventory data for the program:

- the Crown Lands Registry
- the BC Geographic Warehouse Provincial Conservation Lands Spatial Layer
- the Conservation Lands Database

These data sources are updated at different times, creating inconsistencies between them. Lands Branch staff update the Crown Lands Registry when conservation lands are secured or when there are changes to land status; GeoBC staff update the spatial layer when directed by

program staff; and provincial program staff update the Conservation Lands Database when regional staff submit changes.

The inconsistencies between the data sources made it hard to assess which data was accurate. The total number of administered conservation lands was not readily available. We had to reconcile data from the spatial layer and the Conservation Lands Database, and this was further complicated because the data was in different scales (land parcel and site level).

Ultimately, we could not confirm the total number of non-administered conservation lands because the key data source, the Crown Lands Registry, included non-administered lands that are not part of the program and that are used for other purposes. As a result, the total number of non-administered lands was overcounted.

Staff have had challenges maintaining inventory data on conservation lands because responsibility for tracking information and data on the program has shifted between various ministries and branches, and between regional offices and the provincial headquarters.

Why this matters

The ministry needs an accurate inventory of conservation lands to monitor and report on progress and to make informed program decisions.

Recommendations

We recommend that provincial and regional staff:

- 9 work with Crown Lands Registry and GeoBC staff to coordinate updates to the program's three key inventory sources**

[See the response from the auditee.](#)

- 10 work with Crown Lands Registry staff to correct the inaccurate tracking of non-administered conservation lands and develop a method to accurately track this information**

[See the response from the auditee.](#)

Ministry not monitoring and reporting program effectiveness

What we looked for

We assessed whether the ministry had monitored and reported publicly on the overall effectiveness of the program. More specifically, we looked at whether the ministry was tracking and reporting on its progress toward meeting performance measures and targets.

[Learn more about the audit criteria.](#)

What we found

The ministry had not monitored or reported publicly on the effectiveness of the program because the program lacked performance measures and targets against which to assess its progress.

Despite the lack of monitoring and reporting at the program level, the regions had monitored and reported publicly on the effectiveness of their site-level conservation work through the Habitat Conservation Trust Foundation's Conservation Lands Operations and Management Program.

Why this matters

Without monitoring, the ministry does not know if the program is working and can't publicly report results. It also doesn't know how to improve the program.

Recommendation

We recommend that provincial and regional staff:

- 11**
 - **monitor for effectiveness using performance measures and targets from the provincial strategic plan**
 - **report publicly on the program's progress, at both the provincial and regional level**

[See the response from the auditee.](#)

ABOUT THE AUDIT

We conducted this audit under the authority of section 11(8) of the *Auditor General Act* and in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001—Direct Engagements, set out by the Chartered Professional Accountants of Canada (CPA Canada) in the *CPA Canada Handbook—Assurance*. These standards require that we comply with ethical requirements and conduct the audit to independently express a conclusion against the objective of the audit.

A direct audit involves understanding the subject matter to identify areas of significance and risk, and to identify relevant controls. This understanding is used as the basis for designing and performing audit procedures to obtain evidence on which to base the audit conclusion.

We analyzed policy and legislation, program guidance, work plans and reports, land management plans and program data. We also interviewed provincial staff, regional staff from all eight regions, and the program's conservation partners. This included travelling to four of the eight regions (before the COVID-19 pandemic) for in-person interviews with ministry staff and tours of several wildlife management areas. We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Our office applies the Canadian Standard on Quality Control (CSQC 1) and we have complied with the independence and other requirements of the code of ethics issued by the Chartered Professional Accountants of British Columbia that are relevant to this audit.

Audit report date: May 3, 2021



Michael A. Pickup, FCPA, FCA
Auditor General of British Columbia
Victoria, B.C.

APPENDIX A: RECOMMENDATIONS AND AUDITEE RESPONSE

RECOMMENDATION 1: We recommend that provincial and regional staff work with conservation partners to establish a shared list of provincial and regional priority habitats for the program.

RECOMMENDATION 1 RESPONSE: The ministry accepts this recommendation.

Work is already underway to inform priority habitats for the program, with consideration to climate change. We will identify a process, developed collaboratively with the Conservation Lands Partner Program (CLPP)¹ members and Indigenous peoples, to identify a shared list of priority habitats at both provincial and regional scales for acquisition (administered and non-administered lands), as well as a review schedule to ensure that conservation values and management plans are current and relevant to protect the priority habitats identified.

¹ The Conservation Lands Partner Program membership includes the Ministry of Forests, Lands, Natural Resource Operations and Rural Development, Ministry of Environment and Climate Change Strategy, Ducks Unlimited Canada, Nature Trust of British Columbia, Habitat Conservation Trust Foundation, Nature Conservancy of Canada and the Canadian Wildlife Service of Environment and Climate Change Canada.

RECOMMENDATION 2: We recommend that provincial and regional staff work with conservation partners, including Indigenous peoples, to develop and implement a provincial strategic plan for the program, including goals, objectives, outcomes, performance measures and targets.

RECOMMENDATION 2 RESPONSE: The ministry accepts this recommendation.

Much of the Conservation Lands Program history of success is built on strong partnerships with conservation organizations, both at the provincial and regional scale. Leveraging existing, and creating new, partnerships will be key in the development of our strategic plan. We will further engage the Minister's Wildlife Advisory Council and the First Nations-BC Wildlife and Habitat Conservation Forum established under the Together for Wildlife Strategy to provide input and comment on the strategic plan.

RECOMMENDATION 3: We recommend that the ministry clarify the purpose of non-administered conservation lands and provide direction to the regions regarding how these lands should be secured and maintained.

RECOMMENDATION 3 RESPONSE: The ministry accepts this recommendation.

Provincial and regional staff will work together to develop policy and procedure on the purpose of non-administered conservation lands which are designations under the *Land Act* made for conservation purposes. The use of *Land Act* designations as a first or 'holding' step towards Wildlife Management Area designation under the *Wildlife Act* will also be clarified. Policy will also identify expectations for the ongoing management and review of existing designations to ensure they continue to contribute to conservation objectives.

RECOMMENDATION 4: We recommend that the ministry include specific direction for staff to collaborate with Indigenous peoples in the provincial strategic plan for the program.

RECOMMENDATION 4 RESPONSE: The ministry accepts this recommendation.

In 2017, all provincial program areas were directed to review policies, programs, and legislation to determine how to bring the principles of the United Nations Declaration on the Rights of Indigenous Peoples and the Calls to Action of the Truth and Reconciliation Commission into action. Even prior to that mandate, the Conservation Lands Program has had partnerships with various Indigenous communities in the province. To emphasize this direction and improve clarity on the expectations for Conservation Lands Program staff, the strategic plan will include direction to collaborate with Indigenous people in all aspects of the Conservation Lands Program.

RECOMMENDATION 5: We recommend that the regions ensure that all wildlife management areas have current and approved management plans.

RECOMMENDATION 5 RESPONSE: The ministry accepts this recommendation.

In 2020-21, funding was provided to develop management plans for two key Wildlife Management Areas: Columbia Wetlands and East Side Columbia Lake. Additional WMAs are slated for new planning in 2021-22. We will continue to progress work in priority order. The provincial strategic plan will identify a target by when all WMA plans will be completed or updated.

RECOMMENDATION 6: We recommend that provincial and regional staff work with the Compliance and Enforcement Branch and the Conservation Officer Service to develop a strategy to reduce unauthorized use in the most at-risk administered conservation lands.

RECOMMENDATION 6 RESPONSE: The ministry accepts this recommendation.

Conservation Land Program staff have recently completed a suite of draft policies intended to help clarify activities and land uses that are compatible with administered conservation lands. We will work with the Compliance and Enforcement Branch and Conservation Officer Service to finalize policies and develop an enforcement strategy to inform resourcing needs, to reduce unauthorized use in the most at risk administered conservation lands, to be reviewed on an annual basis moving forward.

RECOMMENDATION 7: We recommend that the ministry complete the Overlap of Conservation Lands and *Range Act* Tenures Project, including resolving all incompatible overlaps and developing direction regarding where and under what conditions *Range Act* tenures should be issued on administered conservation lands.

RECOMMENDATION 7 RESPONSE: The ministry accepts this recommendation.

The Ministry is committed to resolving all incompatible overlaps of range tenures on conservation lands. Two-thirds of the overlaps identified at the outset of the Conservation Lands and *Range Act* Tenures Project have been resolved. Some of those that remain have had a decision made to resolve the overlap, and we are working to implement these decisions. Moving forward, we will complete a work plan for resolution of all remaining overlaps in collaboration with the Range Branch.

RECOMMENDATION 8: We recommend that provincial and regional staff develop and implement a system to track infrastructure on conservation lands, including the dams managed by Ducks Unlimited Canada.

RECOMMENDATION 8 RESPONSE: The ministry accepts this recommendation.

The West Coast and South Coast Conservation Land Management Programs, where conservation lands are managed through a regional partnership, already have a system for tracking infrastructure through an application for mobile devices. Provincial staff will consider existing systems and create a plan for how inventory should be tracked, including whether a provincial centralized system is warranted, or provide support for regional systems.

Ducks Unlimited Canada is an important partner in the management of critical wetland habitat across the province. In addition to the above, provincial staff will meet with Ducks Unlimited Canada to review the status of each dam or water control structure on conservation lands and work with regional staff and the Water Management Branch to determine whether site visits or other actions may be required.

RECOMMENDATION 9: We recommend that provincial and regional staff work with Crown Lands Registry and GeoBC staff to coordinate updates to the program's three key inventory sources.

RECOMMENDATION 9 RESPONSE: The ministry accepts this recommendation.

Short-term actions are already underway to improve information management. These actions will inform a Data and Information Management Procedure to ensure ongoing coordination of the three key inventory sources. This procedure will be developed in cooperation among provincial, regional, Crown Lands Registry and GeoBC staff. Considerations will include the workflow for new updates and review of existing information in the Crown Lands Registry (see recommendation 10).

RECOMMENDATION 10: We recommend that provincial and regional staff work with Crown Lands Registry staff to correct the inaccurate tracking of non-administered conservation lands and develop a method to accurately track this information.

RECOMMENDATION 10 RESPONSE: The ministry accepts this recommendation.

The Crown Lands Registry tracks many thousands of *Land Act* designations across the province and those tracked for conservation purposes are a small portion. Non-administered conservation lands are identified in the Crown Lands Registry by the purpose "Environment, Conservation and Recreation" and sub-purpose "Fish and Wildlife Management". Regional projects are currently underway or completed to ensure data are accurate. Conservation Lands Program staff will support the Lands Branch to coordinate these efforts at the provincial level and create a plan to review outstanding *Land Act* designations with the purpose "Environment, Conservation and Recreation" to ensure the correct sub-purpose is identified for non-administered conservation lands.

RECOMMENDATION 11: We recommend that provincial and regional staff:

- monitor for effectiveness using performance measures and targets from the provincial strategic plan
- report publicly on the program's progress, at both the provincial and regional level

RECOMMENDATION 11 RESPONSE: **The ministry accepts this recommendation.**

The Ministry will include performance measures and targets in the provincial strategic plan. We will report publicly on the Conservation Lands on an annual basis as part of the implementation of the Together for Wildlife Strategy performance management framework. When the strategic plan is complete, we will ensure that public reporting aligns with specific performance measures and targets identified.

APPENDIX B: AUDIT CRITERIA

Line of enquiry 1: Strategic direction	
Criteria 1.1	The ministry has identified the fish and wildlife species it aims to conserve for the Conservation Lands Program
Criteria 1.2	The ministry has identified the important habitat it aims to conserve for the Conservation Lands Program
Criteria 1.3	The ministry has assessed which important habitats are of priority for the Conservation Lands Program
Criteria 1.4	The ministry has established a strategic plan to support the Conservation Lands Program
Criteria 1.5	The ministry has communicated direction for the implementation of the Conservation Lands Program to provincial and regional operations
Criteria 1.6	The ministry is supporting staff to collaborate with Indigenous peoples when securing and managing conservation lands
Line of enquiry 2: Securing and managing conservation lands	
Criteria 2.1	The ministry is transitioning conservation lands to wildlife management areas
Criteria 2.2	The regions have implemented management plans for their administered conservation lands
Criteria 2.3	The regions ensure that activities in administered conservation lands are compatible with management objectives
Criteria 2.4	The regions are maintaining infrastructure on conservation lands
Criteria 2.5	The regions are monitoring third parties with delegated responsibility for managing administered conservation lands
Criteria 2.6	The ministry's inventory of conservation lands is accurate
Line of enquiry 3: Monitoring and reporting on the Conservation Lands Program	
Criteria 3.1	The ministry is monitoring the effectiveness of the Conservation Lands Program
Criteria 3.2	The ministry reports publicly on its progress on the Conservation Lands Program

APPENDIX C: NATURAL RESOURCE REGIONS



Source: Ministry of Forests, Lands, Natural Resource Operations and Rural Development (January 2021)

APPENDIX D: WILDLIFE MANAGEMENT AREAS



Source: Ministry of Forests, Lands, Natural Resource Operations and Rural Development (February 2021)



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