

Archaeology Audit Program

2017 Report



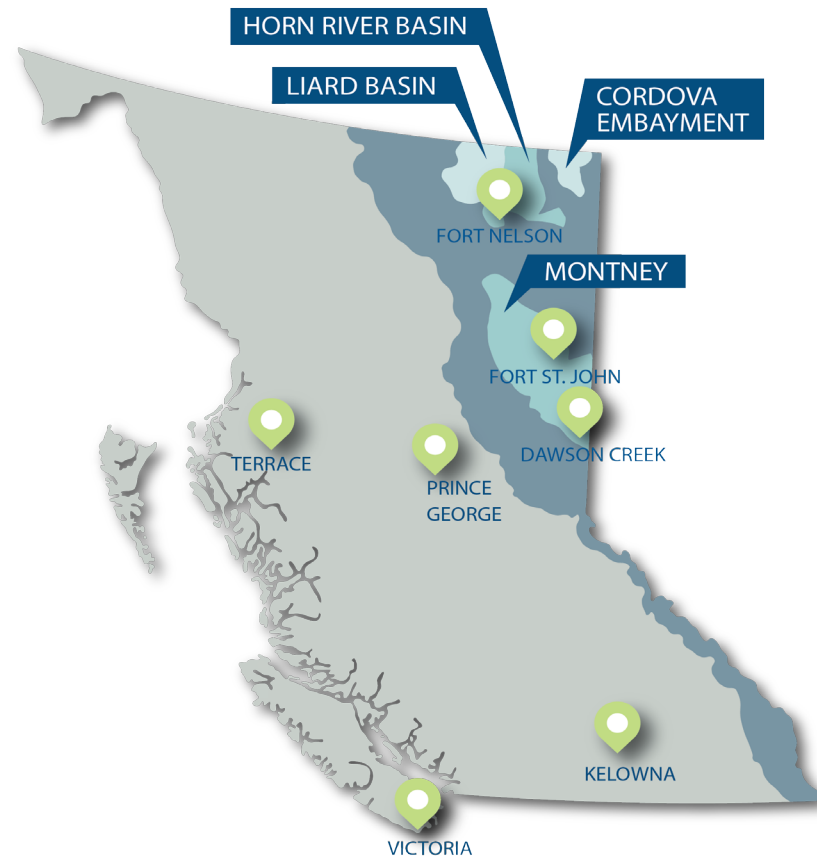
Role of the

BC OIL AND GAS COMMISSION

The [BC Oil and Gas Commission](#) (Commission) is the provincial regulatory agency with responsibilities for regulating oil and gas activities in British Columbia, including exploration, development, pipeline transportation and reclamation.

The Commission's core services include reviewing and assessing applications for industry activity, consulting with First Nations, cooperating with partner agencies, and ensuring industry complies with provincial legislation and all regulatory requirements. The public interest is protected by ensuring public safety, respecting those affected by oil and gas activities, conserving the environment and ensuring equitable participation in production.

For general information about the Commission, please visit www.bcogc.ca or phone 250-794-5200.



The Commission's workforce consists of 250 employees operating out of seven locations - Fort Nelson, Fort St. John, Dawson Creek, Terrace, Prince George, Kelowna and Victoria, with the largest number of employees concentrated in Fort St. John, the heart of oil and gas activity in the province. The offices in Fort Nelson and Dawson Creek ensure the Commission's presence in the communities of the Horn River Basin and Montney gas plays respectively.

OUR VISION

To provide oil and gas regulatory excellence for British Columbia's changing energy future.

OUR MISSION

We regulate oil and gas activities for the benefit of British Columbians.

We achieve this by:

- Protecting public safety,
- Respecting those affected by oil and gas activities,
- Conserving the environment, and
- Supporting resource development.

Through the active engagement of our stakeholders and partners, we provide fair and timely decisions within our regulatory framework.

We support opportunities for employee growth, recognize individual and group contributions, demonstrate accountability at all levels, and instill pride and confidence in our organization.

We serve with a passion for excellence.

OUR VALUES

Respectful	Accountable
Effective	Efficient
Responsive	Transparent

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INTRODUCTION

PURPOSE OF REPORT

The Commission introduced the Archaeology Audit Program (AAP) in 2008 to assess permit holders' ability to manage archaeology resources. The AAP was created as a necessary component of the performance-based and professional reliance review process for archaeology. It is the permit holders' responsibility to ensure all legal and regulatory obligations are met.

Oil and gas applicants are expected to engage archaeology professionals to evaluate archaeology conflicts within their proposed development areas. It is the expectation of the Commission that under such a process permit holders take responsibility and are accountable for the protection and management of heritage resources. Permit holders must ensure planning and development activities comply with the [Heritage Conservation Act \(HCA\)](#) and meet conditions set out by the Commission.

The Commission provides support throughout the entire lifecycle of each project to assist permit holders in achieving best practices when managing archaeology resources. It is at the post-construction phase of the project that the AAP is engaged and when the Commission evaluates the effectiveness of the permit holder's performance by auditing their archaeology management system.

Each audit considers changing trends in the oil and gas industry to ensure all aspects and types of development are considered. Previous audit results help focus the Commission's resources on oil and gas companies who have scored poorly in the past. Companies selected for audit, but who have produced exemplary audit results, may be exempt and replaced through random selection.

This report details the results of the 2017 AAP for the 11 audited permit holders and includes observed best practices as well as noted opportunities for improvement.

AUDIT PROCESS

The 2017 AAP process consisted of two tiers. Tier 1 contained two components:

1. Interviews with personnel key to the audited project(s).
2. Field inspections to confirm the implementation of archaeology recommendations and physical success of the management system.

Tier 2 was reserved for audited companies where non-conformance (NC) was found, or where numerous opportunities for improvement (OI) were observed. The audit did not advance to Tier 2 for any of the auditees, but opportunities for improvement (OI) were recognized within the management system in all but one company.

Although audit recommendations are not binding, the 2018 audit will include an informal survey with auditees who received OI findings to confirm if recommendations from the 2017 audit have been implemented. The AAP includes ways to measure and improve its effectiveness so it can ensure industry is meeting requirements.

Each audited permit holder received an individual report detailing the results of the audit. The reports provided recommendations for measures that may help improve management practices or controls.

OBJECTIVES AND PRINCIPLES

THE AUDIT TEAM

The 2017 AAP team was comprised of the Commission's Heritage Conservation Program (HCP) staff. This consisted of a Lead Auditor, Auditor and Audit Coordinator. The audit team has extensive experience in reviewing and advising on the work of both oil and gas permit holders and archaeologists working in the province of B.C. Additionally, ISO 9001 and 14001 lead auditor training is provided to Commission HCP staff.



PHOTO 1: Foreground: Pipeline bored under archaeology site;
Background: area of archaeological potential.

The AAP has two primary objectives:

1. To ensure the client management systems are adequate to ensure compliance with legislative and regulatory obligations.
2. To gather baseline data for the establishment of best management practices for archaeology resource management within the oil and gas sector of British Columbia.

The AAP relies on the principles of independence and objectivity. Specifically, the following principles guide the conduct of this audit and the presentation of the audit results:

- Auditors shall act in an ethical manner and make decisions by applying due professional care and based on evidence obtained during the audit. Auditors will not act outside their areas of competence and knowledge.
- Auditors will be impartial and independent of the activity that they are auditing, and act without bias or prejudice.
- Information reviewed or obtained during the audit process will be held in confidence by the auditors and only included in the audit report where the information is relevant to an audit finding.
- Audit results will be presented in a fair and accurate manner, and will truthfully reflect the audit activity and evidence.

SAMPLING METHOD

The **2017 Archaeology Audit Program Procedure Manual** (Manual) is a complete guide for the audit process at the Commission and available on the Commission's website. It should be referenced for complete methodology and sampling details to supplement this report. The manual is modified for each new audit to reflect changes in sampling strategies and audit protocols. The manual is updated prior to each new audit year and details sampling rationale and audit questions for auditees to review.

Projects were chosen manually from the target population based on time frame, accessibility and identified archaeological values. For the 2017 AAP, the target population consisted of permit holders with projects constructed from January 1, 2015 to December 31, 2015. The resulting sample drawn from the 2015 population consisted of 11 permit holders with a total of 18 projects.

Although the intended sampling goal was to audit two projects for each selected permit holder, in five instances the selected auditee had constructed only one project that contained the required criteria. For all other audited permit holders, two projects were selected for audit. Figure 1 illustrates the distribution of field audits conducted to date through the AAP.

FIGURE 1: CUMULATIVE MAP OF ARCHAEOLOGY AUDIT PROGRAM LOCATIONS

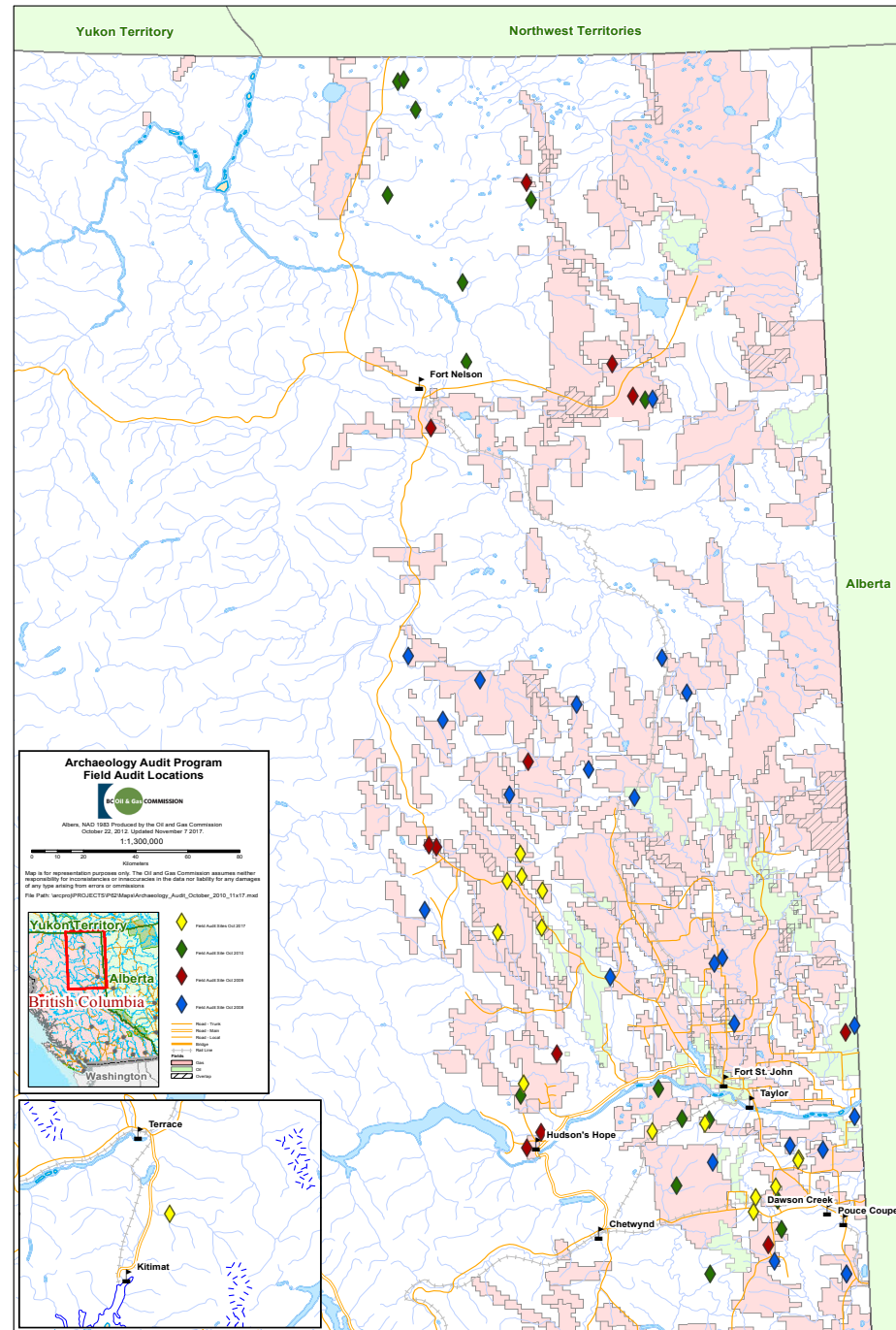


TABLE 1: MEASUREMENT CRITERIA AND FUNCTIONAL OBJECTIVES

Criteria Measured	Functional Objectives
Process Creation and Management	Supports adherence to legislation and regulatory requirements through established processes.
Risk and Risk Management	To establish the level of risk a company is willing to take and how that risk is managed.
Communication	To establish communication competence between administrative/office personnel and field crews.
Record and Document Control	Transfer of information between relevant parties to support project success and regulatory compliance.
Compliance Process and Knowledge	Level of knowledge for processes that ensure compliance with regulatory requirements and legislation.

DATA ANALYSIS

The interview component of Tier 1 consisted of a series of questions and sub-questions. The audit questions were designed to analyze and rate the various components of the archaeology management systems with the goal of establishing the overall effectiveness of the system.

Table 1 (to the left) contains the criteria components derived from the structure of an archaeology management system and provides the general functional objective of the criteria.



PHOTO 2: Archaeology site on a terrace above creek with no work flagging and permanent fencing.

Table 2 details each question presented during the audit, the criteria (referenced in Table 1) to be measured and the intent of scoring the criteria.

The scoring criteria for each component was derived from observations of past best and worst practices demonstrated by permit holders. For each question asked, responses directly related to the range of performance values established prior to audit. Auditee responses were compared to the control set of possible answers and a finding assigned.



PHOTO 3: Pipeline bored under archaeology site (site mid-ground).

TABLE 2: TIER 1 AUDIT QUESTIONS

QUESTIONS	CRITERIA MEASURED	INTENT
1. Can you describe your role and the work you do for the company?	<ul style="list-style-type: none"> Process Creation and Management Risk and Risk Management Communication 	To establish the interviewee role, and the level of involvement the role has in the archaeological management process.
2. Do you know whether this project required an on-the-ground archaeological assessment?	<ul style="list-style-type: none"> Communication 	To establish the effectiveness of communication between the archaeologist and the auditee.
a. How do you know?	<ul style="list-style-type: none"> Communication Record and Document Control 	To determine how information is disseminated and the effectiveness of the process.
b. (If it is a person) What is their name and title?	<ul style="list-style-type: none"> Communication 	To establish from where the communication originates or person in charge of communication.
c. Can you describe how this communication takes place for each project? Is this communication documented/tracked?	<ul style="list-style-type: none"> Communication Record and Document Control 	To establish the effectiveness of communication between archaeologist and the auditee.
d. (If it is a document) What is the name of the document? Who has access to it?	<ul style="list-style-type: none"> Record and Document Control 	To determine how information is disseminated and the effectiveness of this process.

QUESTIONS	CRITERIA MEASURED	INTENT
3. Did construction begin prior to the Archaeological Impact Assessment (AIA) being complete?	<ul style="list-style-type: none"> Risk and Risk Management 	To evaluate the level of risk the company is willing to undertake.
<p>a. If construction begins prior to the AIA being completed, how do you know what areas are ready for construction and what areas have yet to be subject to an AIA?</p> <p>b. What do you do if there is a site identified by the archaeologists during an assessment while the project is being constructed?</p> <p>c. Whom do you contact if you have archaeology concerns during construction activities?</p>	<ul style="list-style-type: none"> Process Creation and Management Risk and Risk Management Communication Record and Document Control Process Creation and Management Communication Record and Document Control Process Creation and Management 	<p>To establish the ability to manage risk they are taking by starting construction prior to the assessment being complete. To determine how information is disseminated and the effectiveness of the process.</p> <p>To assess the ability to adhere to legislation and permit conditions through established procedures. To determine how information is disseminated and the effectiveness of the process.</p> <p>To determine the auditee's ability to adhere to legislation and permit conditions through established procedures.</p>
4. Do you know if any sites were identified on this project?	<ul style="list-style-type: none"> Communication 	To establish the effectiveness of communication between the archaeologist and the auditee.
<p>a. How do you know?</p> <p>b. Were the sites marked in the field?</p> <p>c. Have the construction plans been updated with the mitigation strategy/sites in conflict?</p>	<ul style="list-style-type: none"> Communication Record and Document Control Process Creation and Management Risk and Risk Management Communication Compliance Risk and Risk Management Record and Document Control 	<p>To determine how information is disseminated and the effectiveness of the process.</p> <p>To determine if legislative or permit conditions were met and/or internal auditee processes were followed and/or managing risk when sites are not marked.</p> <p>To ensure that document updates are completed if required. If not required, ability to manage risk associated with incomplete documents.</p>

QUESTIONS	CRITERIA MEASURED	INTENT
d. If a project is revised, how do you know if the archaeology assessment is complete for the most updated version on the project?	<ul style="list-style-type: none"> • Communication • Record and Document Control 	To determine how information is disseminated and the effectiveness of the process.
e. Who is present when construction takes place in proximity to the archaeology site or area to be avoided? Who is responsible for the site during construction?	<ul style="list-style-type: none"> • Process Creation and Management • Communication • Risk and Risk Management 	To determine how auditee manages risk associated with archaeology sites in close proximity to construction. To identify if the auditee has a process and assigned responsibilities for on site management of archaeology.
f. What would you do in an instance of an accidental entry by one of your crew into an archaeology site flagged for avoidance during construction?	<ul style="list-style-type: none"> • Process Creation and Management • Communication • Compliance Process and Knowledge 	To determine if the auditee understands regulatory requirements and reporting processes.
g. Is there a post construction inspection conducted to confirm mitigation strategies were followed?	<ul style="list-style-type: none"> • Process Creation and Management • Compliance Process and Knowledge 	To evaluate the auditee's quality assurance processes. To determine if regulatory requirements are met.
h. Do you know the penalties for damaging an archaeological site?	<ul style="list-style-type: none"> • Compliance Process and Knowledge 	To evaluate auditee's understanding of heritage legislation.
5. Is the crew informed of the location of the archaeology site(s)?	<ul style="list-style-type: none"> • Communication 	To establish the effectiveness of communication between office staff and field personnel.
a. How are they informed?	<ul style="list-style-type: none"> • Communication • Record and Document Control 	To determine how information is disseminated and the effectiveness of the process.
b. Is there any training provided to the crew with respect to archaeology on this project or for archaeology in general?	<ul style="list-style-type: none"> • Risk and Risk Management • Communication 	Based on Environmental Assessment Office (EAO) regulatory requirements, mandatory archaeology training is required. The Commission is comparing regional commitment and capacity development to large EAO projects.
c. What do you do if an artifact is recovered by a construction crew during construction?	<ul style="list-style-type: none"> • Process Creation and Management • Compliance Process and Knowledge 	To determine if the auditee has the appropriate stop-work procedures in place and the procedure reflects regulatory requirements.

QUESTIONS	CRITERIA MEASURED	INTENT
Field Observations: During the course of the field inspection, can the auditor observe:		
a. All mitigation measures are in place?	<ul style="list-style-type: none"> • Compliance Process and Knowledge 	To determine if the auditee has followed regulatory requirements.
b. No cultural materials are visible in disturbed areas?	<ul style="list-style-type: none"> • Compliance Process and Knowledge 	To determine if the auditee has followed regulatory requirements.
c. Field observations match information presented in applicable documentation (Archaeological Assessment Information Form [AAIF])?	<ul style="list-style-type: none"> • Compliance Process and Knowledge • Record and Document Control 	To determine if the auditee has followed regulatory requirements and can present approved documents.
Required Documentation	<ul style="list-style-type: none"> • Record and Document Control 	To ensure auditee has current approved documents on file.



PHOTO 4: Note bend in the right of way to avoid the archaeology site.

AUDIT FINDINGS

The audit findings reflect the assessed risk for management system failure or success based on deficiencies or best practices noted during the audit. Audit findings have four categories representing a range from best practices to non-compliance vulnerability. Each standard finding and definition is detailed in Table 3.

The results of the 2017 audit indicated an overall satisfactory scoring for most auditees. Table 4 contains the anonymous individual results sorted by audited companies.

TABLE 3: FINDINGS CATEGORIZATION

FINDING CATEGORY	DESCRIPTION
EXEMPLARY PERFORMANCE (EP)	Innovative, pro-active or practices that exceed requirements.
SATISFACTORY (S)	Sufficient management system to support compliance with legal and regulatory requirements.
OPPORTUNITY FOR IMPROVEMENT (OI)	Management system with weaknesses that could lead to system breakdown. Minimal effort was afforded for development of a specific management plan to manage archaeological resources or ensure compliance with legal and regulatory requirements.
NON-COMPLIANCE (NC)	Regulatory, legal or other requirements were not met.

TABLE 4: CUMULATIVE FINDINGS BY INDIVIDUAL COMPANY

	EP	S	OI	NC	N/A
COMPANY A	1	17	9	0	8
COMPANY B	3	22	3	0	7
COMPANY C	3	19	6	0	7
COMPANY D	4	21	4	0	6
COMPANY E	3	24	2	0	6
COMPANY F	3	22	3	0	7
COMPANY G	5	21	1	0	8
COMPANY H	4	23	1	0	7
COMPANY I	3	24	0	0	8
COMPANY J	1	25	3	0	6
COMPANY K	2	22	3	0	8



PHOTO 5: Archaeology site boundary flagged tree cut down by clearing crew.

Sorting by cumulative response for each question (Table 5), illustrates an overall trend of strengths and a few weaknesses. Questions 4 (f), (g), and (h) contained the highest number of OI scores. The questions focused on the company's in-place processes to confirm compliance and processes around accidental non-compliance and reporting.

The greatest number of EP scores were found in Questions 1, 3 and 4 (e). The score for Question 1 was based on the ability to provide the most appropriate persons for the audit interview. Questions 3 and 4 (e) assess the efforts made by companies to minimize risk. Scores reflect whether dedicated personnel are assigned or processes are in place to maximize the protection of archaeological sites.

HIGHEST NUMBER OF OI SCORES:

Question 4 (f), (g), and (h).

HIGHEST NUMBER OF EP SCORES:

Questions 1, 3 and 4 (e).

TABLE 5: CUMULATIVE RESULTS BY INDIVIDUAL QUESTION

	EP	S	OI	NC	N/A
QUESTION 1.	8	3	0	0	0
QUESTION 2.	0	11	0	0	0
a.	0	11	0	0	0
b.	2	2	0	0	7
c.	0	7	3	0	1
d.	0	10	0	0	1
QUESTION 3.	10	1	0	0	0
a.	0	1	0	0	10
b.	0	1	0	0	10
c.	0	1	0	0	10
QUESTION 4.	0	11	0	0	0
a.	0	10	1	0	0
b.	0	10	0	0	1
c.	0	10	1	0	0
d.	0	8	2	0	1
e.	9	1	0	0	1
f.	0	7	4	0	0
g.	3	2	6	0	0
h.	0	8	3	0	0
QUESTION 5.	0	11	0	0	0
a.	0	10	1	0	0
b.	0	10	1	0	0
c.	0	8	3	0	0
FIELD OBSERVATIONS					
a.	0	11	0	0	0
b.	0	11	0	0	0
c.	0	11	0	0	0
REQUIRED DOCUMENTATION					
AAIF	0	8	3	0	0
AIA	0	9	2	0	0
Permit	0	11	0	0	0
Mitigation	0	8	2	0	1
Maps	0	8	3	0	0
Management Plan	0	0	0	0	11
Section 12	0	0	0	0	11
Monitoring Report	0	1	0	0	10
Additional Documents	0	8	0	0	3

DISCUSSION

A major challenge for every AAP is to ensure the appropriate interviewees are identified by the audited permit holders and they are present for the interview and field inspection. Ideally, this would include the person in charge of compiling and delivery of the construction package to the field crew and the construction supervisor responsible in the field for the particular project(s) under audit. Understandably, these people may no longer be with the company, but a successor holding lateral and current positions is expected to be briefed by the permit holder and present for interview.

In 2017, eight audited companies were able to provide the personnel original to the project with the remaining companies presenting persons currently filling positions equal to or lateral to the original personnel. The audit for three permit holders was affected by auditee representatives as they were not able to speak directly to the audited projects. The results, however, were equally comparable to the other auditees as it relates to current processes and the evaluation risk.

Audited permit holders received individual results letters on the successes and weaknesses within their management systems, detected during the audit. The auditees were provided a 14 day response period to comment on the results, or provide additional requested information. During the comment period, seven companies replied detailing their intentions to implement procedures suggested in the audit results letter. Four companies neither submitted nor responded to the Commission's request for supplemental information.

Based on observed vulnerabilities within vital components of two auditees' management systems, these companies will be included for a complete audit in 2018. A partial audit will be conducted with

Company H (in Table 4) who added a project component without notification to the Commission. Because the issue is still under investigation, this possible non-compliance does not appear in any of the results or findings tables.



PHOTO 6: Artifact found in a constructed pipeline right of way.



PHOTO 7: Artifact found in a constructed workspace.

OPPORTUNITIES FOR IMPROVEMENT

Opportunities for improvements (OI) were found in numerous areas and for all but one company. The number of OIs ranged from one company receiving zero to one company receiving OIs in nine audited areas. The following list includes some of the findings and observations that are considered weaknesses in archaeology management systems:

- **Four companies did not know the Commission should be the first point of contact for an incident that involved archaeological resources.**
- **Poor knowledge of process (communication) and document control was found in three companies** where auditees could not describe how progress and results or archaeological assessments are communicated between field and administrative staff.
- **One field inspection revealed a company had added additional area to facilitate their mitigation strategies for two archaeology sites.** Although their mitigation strategy for the archaeology site was adhered to in the field, the addition of the area was not indicated on the permitted construction plans. The auditee has committed to implementing procedures to ensure the situation will not reoccur.
- **One company notified the Commission of their inability to locate the required audit documents** and requested the Commission provide these documents on their behalf. The company was advised that this was counter to audit purpose and protocol. At the time of audit, the company did present documents, but for the wrong projects.
- During one audit interview, a past trespass incident was brought forward for discussion. **The company representatives had not been briefed on the trespass and could not state whether procedures had been implemented to prevent another trespass from occurring.**
- **One construction supervisor was not able to locate the exact location of the audited archaeology sites even though on location during construction.** The Commission's Lead Auditor had to navigate the team to both archaeology site locations.
- **Audit results indicated that, with the exception of one company, it is not common practice to include the archaeology site mitigation approval letter issued by the Commission within the construction field package.** All archaeology site mitigation strategies (including avoidance) must be approved by Commission archaeology staff and acceptance is relayed to the company through written notice. Receipt of this acceptance letter is required prior to job start-up and contains essential information regarding archaeological site mitigation requirements for the field. Providing this document in the construction package for field personnel assures efforts are maximized towards preventing non-conformance. Subsequent to the audit, two companies indicated they would implement this procedure going forward.
- One company's representative indicated there had been occasion where construction commenced prior to the archaeology assessment being complete. Because of this, the subset for Question 3 was presented to the auditee. The question was designed to establish the level of risk a company is willing to tolerate and the subset to establish the ability of the company to manage this risk. **For this company, construction and the archaeology assessment were being managed simultaneously and although the company was not constructing prior to archaeology crews giving clearance, beginning construction prior to assessment completion demonstrates a high risk tolerance by a company and it is not a recommended strategy.**

CUMULATIVE BEST PRACTICES (2008-2016)

Below is a list of the cumulative best management practices observed in previous audits:

1. An on-site construction supervisor provides field orientation for ground crews prior to project start-up when archaeologically sensitive areas exist within a development.
2. Specific individuals are responsible for ensuring all regulatory and legislated archaeological requirements are met for each development.
3. Transfer and receipt of required paper documentation to construction crews is completed prior to project commencement. The documents include archaeology reports and Commission-accepted site mitigation strategies if applicable.
4. Development of a written archaeology resource management plan and formalized standard operating procedures. The management plan fully addresses and includes the following:
 - Relevant legislative and regulatory requirements.
 - Processes for ensuring the completion of archaeological assessments and the timely submission of archaeological reports to the Commission.
 - Checklists to ensure all archaeological requirements are completed prior to construction activities.
 - Processes for fulfillment of requirements surrounding archaeological assessment and site avoidance requirements should range from high level planning to individual task assignments.
 - A briefing of staff, contractors and land agents to ensure familiarity with the contents of the management plan.
5. Create or refine existing tracking systems to include project status and archaeology report submission dates. Emphasis placed on tracking and ensuring information regarding archaeology assessments and site management is accurately and graphically related to field staff.
6. Contact the Commission periodically to reconcile records for regulatory obligations.
7. Develop a communication record, summarizing dates and information exchange. A project communication record serves as a valuable reference for project details and transactions. As well, it is the basis for development or improvement of data distribution processes, as the record illustrates where a breakdown in communication may have occurred.

PHOTO 9: Culturally Modified Tree (CMT). Location near Kitimat.



PHOTO 10: Archaeology site with permanent fencing.

RECOGNIZED BEST PRACTICES 2017

Below is a list of commendations awarded to companies participating in the 2017 audit.

Have an on-site supervisor monitor activities near protected archaeology sites during construction; nine companies asserted this practice.

A specific person or position is accountable for archaeology management. This includes tracking construction activities and associated paperwork. This single point accountability was observed in the management systems of only two audited permit holders; it is a highly recommended practice.

Construction on the project(s) does not begin until the impact assessment is complete and an archaeology impact assessment report is received and approved by the Commission.

A post-construction inspection is conducted to confirm archaeology site mitigation strategies have been adhered to.

RECOMMENDATIONS, CONCLUSIONS and the 2018 AUDIT

RECOMMENDATIONS and CONCLUSION

The following recommendations are proposed for permit holders based on the 2017 AAP results:

1. **Permit holders and their audit representatives should become familiar with any past audit results prior to interview.**
2. **Permit holders should formalize processes for communication, record and document control.**
3. **Permit holders should review required audit documentation and ensure the proper paper work is available at time of audit.**
4. **Permit holders should be prepared to guide the audit team to the field audit location(s).**
5. **Upon receipt of the audit selection letter, companies should contact the Commission to discuss scheduling.**
6. **Audited companies should ensure the appropriate personnel are present for the audit interview, as outlined in the selection letter and AAP manual.**

The results of the 2017 AAP audit indicate the majority of the companies have practices that address most aspects of archaeology resource management. Companies that scored the highest utilized a solid archaeology management system with effective tracking and document control. These companies ensured accountability for, and management of, archaeological resources by assigning responsibility to a specific person or position within the company.

Companies that scored the lowest were those which could not demonstrate or describe their own company's communication system or document tracking for archaeology assessments and reporting. An absence of preparation and organization for the audit suggested these same companies were not concerned with the audit or potential audit results. Nearly all non-compliances related to archaeology are traced back to weaknesses in communication and document control, and therefore these are considered the most important aspects of the archaeology audit.





2018 AUDIT

In 2018, the AAP will include a component to address archaeology report submissions. This applies to projects that required an impact assessment. The requirement for report submissions is incorporated as a permit condition, when appropriate. Random checks in 2017 indicated the majority of Commission permit holders have outstanding permit conditions as they relate to the required submission of archaeology reports. The Commission has been working outside the audit with a few companies with extensive lists of outstanding requirements to assist with this reconciliation.

A number of improvements and additions will be made to the AAP question sets in order to capture missing aspects and eliminate redundancies noted during the 2017 audit process.

More Information

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