

# A Guide to the *Annual Compliance Plan and Compliance Results Report*

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*Identifying and Reporting  
Compliance Projects*



*Prepared by:*  
Compliance Policy and Planning Branch  
Compliance Division  
Ministry of Environment

October 2007

## DEFINITIONS

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For the purposes of this document, the following definitions have been used:

**Annual compliance plan** – a summary of some of the compliance activities and projects that the Ministry expects to undertake in a given fiscal year. This plan is compiled by the Compliance Policy & Planning Branch.

**Compliance** - conformity with regulatory requirements established by government to protect the environment, human health and safety.

**Project** - Any activity that entails a planned, concerted staff effort to address a management question or identified need. A project is normally bounded by time (i.e. it is not an ongoing activity), and its scope and objectives are defined in advance of implementation.

**Provincial theme project** - A project that a division has identified as being important, that is implemented in more than one region using a common methodology. It does not necessarily involve all regions.

**Work planning** – the systematic and strategic process of determining the activities to which resources will be allocated. Work planning can happen on a multi-year, annual or more frequent basis, and at the divisional, program, work unit or individual level.

## CHECKLIST

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ACTION REQUIRED	TIMELINE	PAGE # FOR INSTRUCTIONS
<input type="checkbox"/> Compliance priorities and projects identified through work planning process, including: <ul style="list-style-type: none"> <li>▪ Analysis of priorities</li> <li>▪ Cross-divisional collaboration</li> <li>▪ Consultation with partners and/or stakeholders</li> </ul>	Fall through Spring	6
<input type="checkbox"/> Director submits approved work plans to Compliance Policy & Planning Branch <ul style="list-style-type: none"> <li>▪ Project leads must be identified for each project.</li> </ul>	April 30	11
<input type="checkbox"/> Project leads provide status updates on a quarterly basis (Excel spreadsheet in K:Drive).	June 30 Sept. 30 Dec. 31	11
<input type="checkbox"/> Project leads submit project results summaries to CPPB to be included in annual Compliance Results Report.	May 15	14

## INTRODUCTION

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Planning is a key component of the Ministry of Environment's approach to managing compliance. It helps to ensure effectiveness by ensuring compliance resources are allocated to the program areas and activities that address our greatest risks and challenges and thereby yield the highest public benefit. Planning also helps to ensure efficiency by coordinating compliance efforts within and among divisions. These are particularly important considerations at a time when the Ministry (similar to the rest of government) faces limited resources, heightened public scrutiny and increasing demand for services.

In keeping with its mandate to lead a Ministry-wide approach to compliance management, the Compliance Policy and Planning Branch (CPPB), on an annual basis, produces two documents that provide a corporate-level overview of the Ministry's planned compliance efforts:

1. *The Annual Compliance Plan*, and
2. *The Compliance Results Report*.

Together these documents outline how compliance staff are working to support the achievement of Ministry goals. In turn, this communication helps the Ministry to demonstrate accountability to our partners, stakeholders and the public for the way in which we allocate our compliance resources and efforts.

### The annual work planning cycle

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The identification and planning of compliance projects happens within the context of the Ministry's broader work planning processes. While these processes vary somewhat between divisions, regions, and headquarters branches, they generally follow a similar annual cycle which is outlined in the diagram on page 10.

In broad terms, the annual work planning cycle begins with high level direction from the Ministry Service Plan, the Minister, Deputy, ADMs and possibly additional direction from government. All of this information forms the backdrop for internal Ministry discussions around emerging issues, risks and challenges, partnering opportunities, trends, results of monitoring data and resource allocations. Over the course of the fall and early spring, division staff meet in varying configurations to determine annual work priorities at the division, program, branch, work unit and finally individual staff level (EPDPs).

Detailed work plans emerge in the late spring and are fine tuned once budget allocations are confirmed. Compliance related projects are specifically noted, then listed in the Ministry's annual *Compliance Plan*. Project and routine/on-going work is conducted during the remainder of the fiscal year. Once completed, the results of compliance activities are summarized and compiled into the annual *Compliance Results Report*.

## Purpose and application of this document

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The remainder of this document outlines CPPB's requirements for the planning and reporting of compliance projects by divisions. Specifically, the document provides instructions for:

- Step 1: Identifying annual compliance priorities and projects
- Step 2: Submitting project information for the *Annual Compliance Plan*,
- Step 3: Submitting project summaries for the annual *Compliance Results Report*.

The requirements and instructions outlined in this document apply to:

<b>Environmental Stewardship Division:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> Ecosystems Branch</li><li><input type="checkbox"/> Fish &amp; Wildlife Branch</li><li><input type="checkbox"/> Parks &amp; Protected Areas Branch</li><li><input type="checkbox"/> Regional Operations Branch</li></ul>	<b>Water Stewardship Division:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> Innovation &amp; Planning Branch</li><li><input type="checkbox"/> Management &amp; Standards Branch</li><li><input type="checkbox"/> Science &amp; Information Branch</li><li><input type="checkbox"/> Regional Operations Branch</li></ul>
<b>Environmental Protection Division:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> Environmental Management Branch</li><li><input type="checkbox"/> Environmental Quality Branch</li><li><input type="checkbox"/> Regional Operations Branch</li></ul>	<b>Oceans and Marine Fisheries Division:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> Oceans &amp; Marine Fisheries Branch</li></ul>
	<b>Compliance Division:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> Conservation Officer Service</li></ul>

## STEP 1: Identifying Annual Compliance Priorities

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As part of the annual work planning cycle, divisions are required to establish compliance priorities and identify compliance projects for the upcoming fiscal year. Compliance projects are to be clearly indicated as such in all work plans. It is this list of projects that will form the foundation of the *Annual Compliance Plan* and the *Compliance Results Report*.

### ***What is a Compliance Project?***

A **compliance project** is defined as any activity that entails a planned, concerted staff effort to address a management question or identified need. A project is normally bounded by time (i.e. it is not an ongoing activity), and its scope and objectives are defined in advance of implementation.

**Indicators of a project** may include:

- Where a project plan (charter) needs to be prepared to confirm the project purpose, scope and to guide implementation.
- An activity that includes more than one person or organizational unit.
- The activity requires extra support funding that is beyond normal travel and other allocations.
- A summary of results will be prepared to guide program management decisions or for organizational learning.
- The findings are expected to result in some type of change or follow-up if non-compliance is detected.

**Examples of compliance projects include:**

- Open Burning Smoke Control Regulation Audit
- Unauthorized discharge of municipal refuse at remote sites
- Aquaculture waste disposal audit
- Parking fee compliance audit
- Rangeland monitoring in important grassland communities
- Hunting and access in Churn Creek Park
- Monitoring unauthorized ATV use in Nazko Lake Park
- Shuswap Lake Sport Fish compliance audit
- Okanagan Lake foreshore habitat regulatory compliance audit
- Kakwa Management Plan user compliance inspections
- Groundwater Protection Regulation audit

### ***What is the process for identifying compliance projects?***

The planning of annual compliance projects should be integrated into your branch or region's annual work planning process. Please refer to the work planning cycle on page 10.

This is an iterative process that takes into consideration the Ministry service plan, priorities outlined in multi-year regional or sectoral compliance plans, emerging issues, risk analyses, the results from previous compliance projects, partnering opportunities that arise, and strategic direction from Ministry Executive or broader government. Through a series of divisional meetings and cross-divisional consultations, annual projects emerge.

Each project identified through such work planning sessions should reflect:

## **1. An analysis of priorities**

Priority setting is fundamental to our success in meeting Ministry goals as it increases the likelihood that we will apply our limited resources to our greatest risks and challenges. Compliance priorities are guided by government and Ministry strategic plans and are endorsed by Division Management Committees and Executive.

The following questions serve to guide the identification of compliance priorities:

- What are your business drivers (greatest problems/ impacts)?
- What are the patterns or trends emerging in the region?
- What risk analysis and data is available to substantiate the scope and severity of the identified priorities?
- What ambient or effectiveness monitoring data, or science is available to inform compliance priorities?
- Why pursue one initiative over another and why choose a particular approach, e.g. enforcement as opposed to promotion?
- What follow-up is required to implement recommendations or next steps identified through the previous year's compliance verification projects e.g. audits?
- Is there policy or legislative work to be done to address identified problem areas identified through compliance activities e.g. regulatory reviews; operational policy development?
- Do you wish to measure the effectiveness of a particular management approach over time, and if so, what criteria must you consider for determining effectiveness?

## **2. Cross-divisional collaboration**

In keeping with the cross-divisional and integrated nature of the Ministry's service plan goals, compliance projects need to reflect cross-divisional collaboration at a regional level to ensure that:

- resources are effectively allocated and any potential cost savings are identified,
- roles and responsibilities are clear to all project participants, and
- collectively, the identified projects reflect the regional compliance management issues within the region.

Regional Managers are accountable for ensuring that some form of cross-divisional collaboration takes place to address the considerations noted above. This requirement

may be achieved through existing mechanisms – Regional Compliance Committees or , Regional Manager Compliance Team meetings – or by establishing new mechanisms that are dedicated to compliance planning issues.

### **3. Consultation with partners and/or stakeholders (where necessary)**

It is the nature of our business that we work closely with other government and non-governmental agencies, industry, communities and First Nations. Therefore, where appropriate, we should seek understanding of, and/or support for our compliance priorities from these groups. This is particularly important where we operate under another agency's legislation (e.g. Federal *Fisheries Act*, *FRPA*).

## ***Should the project lists include provincial theme projects and multi-year projects?***

Yes. If your region or branch has projects that span more than one region and/or more than one year, these should be included in your list of compliance projects. These projects should be handled as follows:

### **1. Provincial theme projects**

A Provincial Compliance Theme (or Provincial Compliance Project) is a project that the division as a whole has identified as being important, and that will be implemented in more than one region using a common methodology. It does not necessarily involve all regions, nor does a division have to identify one every year (these projects must be based on a clearly identified need).

A region or headquarters branch that is participating in a provincial project should list that activity on its list of annual compliance projects. However, the results of each participating region/ branch's findings should be summarized in one project report which will be prepared and submitted by the project lead.

### **2. Multi-year projects**

Many Ministry compliance projects span two or more years. Where this is the case, annual work plans should reflect an appropriate division of tasks. For example, year one might identify creating a project plan, developing the methodology, training, and/ or conducting a pilot project, while subsequent year(s) would focus on implementation, results reporting and follow-up activities. Multi-year compliance strategies/ plans for sectors, regulated communities or by regulation, for example, are a useful strategic approach that some divisions are developing or have identified for further consideration.

## ***Does every compliance project require a project plan?***

Yes. Good project management is integral to the success of a project. Project plans help to manage expectations and maximize the likelihood that anticipated results are achieved. Project plans do not have to be long or intricately detailed – they may vary from a page to several pages, depending on the complexity of the project.

The Provincial Compliance Committee *strongly recommends* that all compliance projects begin with a project plan. In particular, project plans are mandatory for those projects that require cooperation or collaboration between more than one staff member, organizational unit, or regional/HQ office.

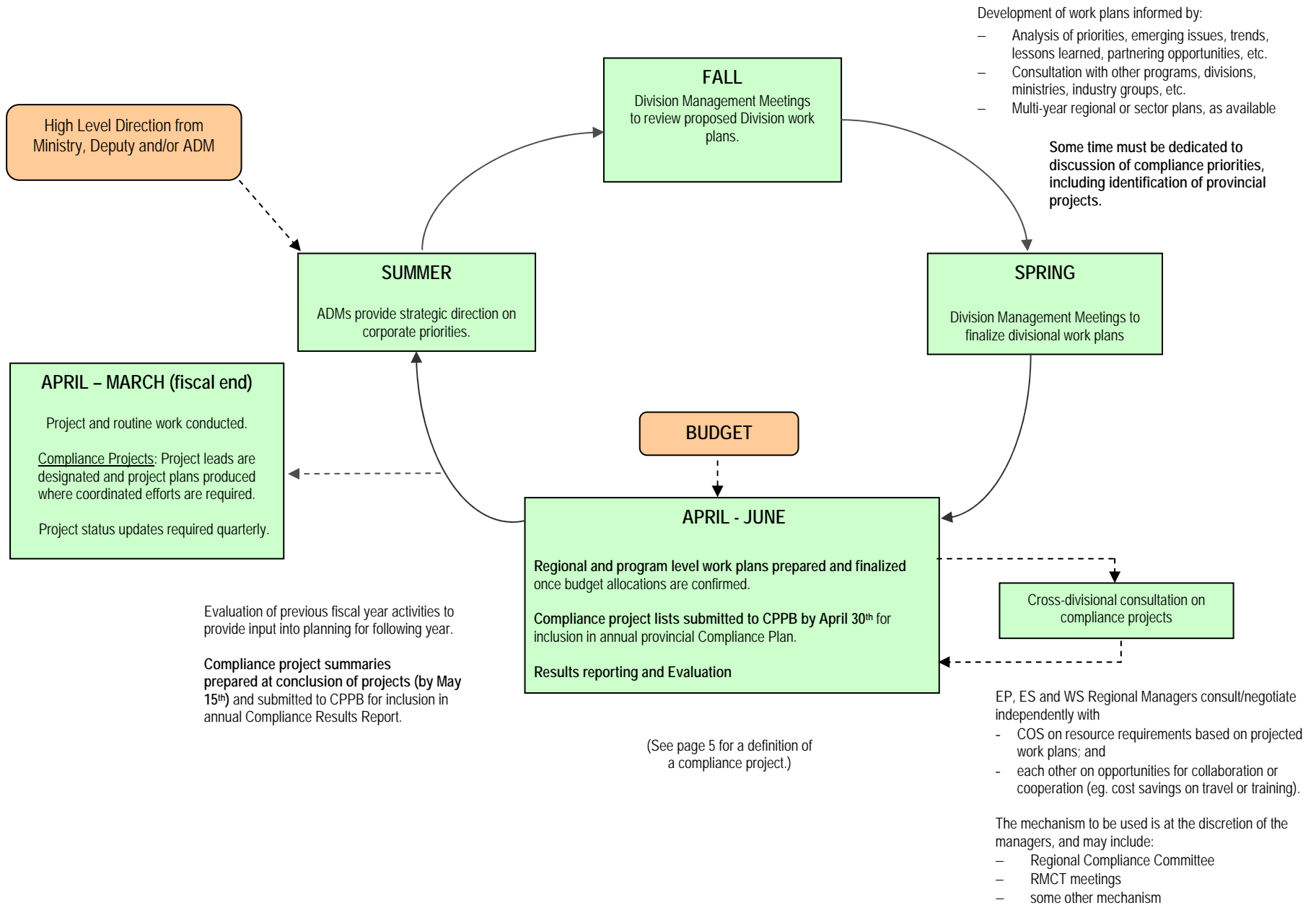
At a minimum, a project plan outlines:

- the objectives of the project (what you are going to do)
- the scope (what's in and what's out)
- the roles & responsibilities (e.g. project lead)
- the methodology (approach)
- the budget (particularly if external funding is involved)
- the intended audience(s) for the results.

Regardless of whether a formal project plan is created, every project must have an identified lead and all participants' time needs to be identified in their EPDPs.

A project plan template is available on the Compliance Policy and Planning Branch intranet website: [http://iwww.env.gov.bc.ca/compliance/policy\\_planning/index.html](http://iwww.env.gov.bc.ca/compliance/policy_planning/index.html)

# Annual Work Planning Cycle



## **STEP 2:**

### **Submitting Information for the *Annual Compliance Plan***

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When the work planning process is complete and a final list of compliance projects has been developed, divisions are required to send information about these projects to CPPB for inclusion in the Ministry's *Annual Compliance Plan*.

The *Annual Compliance Plan* is an internal document that provides a regional and divisional view of compliance activities that the Ministry plans to undertake in a given fiscal year. The plan is posted on the CPPB page of the Ministry's intranet site and will be used by the:

- *Minister and Executive*: To respond to external inquiries, in particular to demonstrate the Ministry's planned approach to compliance management.
- *Divisions (headquarters and regions)*: To view the activities within a division and within a region.
- *Compliance Policy and Planning Branch*:
  - To respond to inquiries from the Minister, Executive, media, etc.
  - To provide advice to divisions on any observed gaps and/or opportunities in planned projects/ activities.
  - To assist in efficiently and proactively promoting compliance activities, i.e. use information to support messaging in information bulletins or in conjunction with the Quarterly Compliance and Enforcement Summary.

The information contained in the *Annual Compliance Plan* also provides the foundation for the annual reporting of compliance results. This process is outlined in a subsequent section of this document.

#### ***Who must submit project information?***

Headquarters Branch and Regional Operations Directors are responsible for approving project lists and forwarding them to CPPB. If a branch or region does not have any projects planned for the new fiscal year, the director is requested to advise CPPB of this fact by the submission deadline.

#### ***When and how must the project information be submitted?***

Project information must be submitted **by April 30th**:

- ✓ to the Compliance Policy and Planning Branch;
- ✓ in electronic format, using the template provided at [http://iwww.env.gov.bc.ca/compliance/policy\\_planning/planning.html](http://iwww.env.gov.bc.ca/compliance/policy_planning/planning.html)

## What information must be provided?

The information required for the *Annual Compliance Plan* is outlined in the template (Excel spreadsheet) provided at [http://www.env.gov.bc.ca/compliance/policy\\_planning/planning.html](http://www.env.gov.bc.ca/compliance/policy_planning/planning.html). Branches and regions are requested to list all compliance projects on this spreadsheet and, for each project, to provide the following details:

1. **Service Plan Objective:** Specify which objective in the Ministry's current Service Plan the project will help achieve.
2. **Project Title:** List the title that is most commonly used to identify the project.
3. **Project Lead:** Provide the name and position of the person who can provide further details about the project, if necessary. This will either be the Project Manager (if one has been named) or the person who will play the lead role in implementing the project.
4. **Project Description:** Provide a brief (one to two line) summary of the project, including the issue that it is intended to address. For multi-year projects, identify what tasks are planned for the coming fiscal year.
5. **Target Audience:** List the individuals or organizations with whom the project findings and results will be shared (e.g., the audited party, industry association, general public).
6. **Timeline for Completion:** Identify the estimated completion date for the project. For multi-year projects, identify what will be done by fiscal year end.
7. **Project Status:** Do not complete this column at this time. See section below (Updating Project Status) for instructions on quarterly status reports.

An **example** of a completed spreadsheet is provided in Appendix A.

## Are project status updates required throughout the year?

Yes. Updates are required on a quarterly basis.

## How will project status updates be used?

Brief quarterly updates help to ensure that the *Annual Compliance Plan* is kept current and project information is available to those who need it. Compliance Policy and Planning Branch requests this information on behalf of Directors, who need to know whether projects are progressing as intended or whether there are issues that require management attention. CPP Branch reviews and summarizes the quarterly updates and presents the information to the Provincial Compliance Committee.

## ***How and when must the project information be updated?***

Project leaders must provide three quarterly status updates for all projects listed in the Compliance Plan. The deadlines for these updates are approximately:

1. June 30,
2. Sept. 30,
3. Dec. 31.

The Excel spreadsheet used to submit project lists also serves as a tracking document (see Appendix A). Each branch or region that has compliance projects listed in the annual compliance plan should maintain a spreadsheet and enter their project status updates directly onto it.

*All project tracking documents are located on the Ministry's **wanshare K: drive** in a folder titled "**COMPLIANCE**". Each of the Ministry's nine regions and all headquarters branches have a sub-folder that holds their compliance-related documents, including the tracking spreadsheet. Staff in each region and branch have read/write access to the files in their sub-folder. Any changes in access in read/write can be arranged through the Shared Services B.C. Service Desk.*

## **STEP 3:**

### **Submitting Information for the *Compliance Results Report***

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The Compliance Results Report (CRR) is an 'annual report' of the results of compliance-related projects undertaken by Ministry staff.

The CRR is not intended to be comprehensive of all Ministry compliance work, but rather it provides a summary of annual priority projects conducted above and beyond routine work to address specific management issues.

#### ***What projects are reported on in the Compliance Results Report?***

Each year, the Ministry's annual Compliance Plan sets the foundation for the CRR – the results of all projects listed in the plan at the beginning of a fiscal year are subsequently reported out in the CRR at the end of the fiscal year. This includes provincial theme projects, as well as ones specific to a region or branch. Additional noteworthy activities for the year may be included, as well as some compliance and enforcement statistics.

#### ***Who is responsible for providing a project summary?***

Typically, project summaries are prepared by the person noted as the 'project lead' for the project.

#### ***What type of project summary is required?***

Project summaries are brief, succinct summaries that relay the *what, why, how* of the project as well as the *results* and *next steps*. A project summary **template** and **sample** summaries are available at

[http://iwww.env.gov.bc.ca/compliance/policy\\_planning/results\\_reporting.html](http://iwww.env.gov.bc.ca/compliance/policy_planning/results_reporting.html)

#### ***When are project summaries due to CPPB?***

Project summaries can be submitted any time during the fiscal year after the completion of the project, ideally by **May 15<sup>th</sup>** unless there are specific reasons why the results cannot be summarized by this time (e.g. large volume of data requiring collation and analysis).

#### ***How is the Compliance Results Report used?***

At this time, the CRR is produced for internal use only. It is intended to facilitate the sharing of the results of compliance activities, and the associated 'lessons learned', among staff and with Ministry executive.

## ANY QUESTIONS?

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Contact the Compliance Policy and Planning Branch:

**Jane Hofweber, Policy Analyst**

Jane.Hofweber@gov.bc.ca

(250) 387-1244

Or, visit the Branch website at [http://www.env.gov.bc.ca/compliance/policy\\_planning/index.html](http://www.env.gov.bc.ca/compliance/policy_planning/index.html) .

## APPENDIX A Sample Compliance Project List and Project Tracking Sheet

### Compliance Projects 2006/07 Region: X

Service Plan Objective	Project Title	Project Lead	Project Description*	Target Audience**	Timeline for Completion	Project Status*** (quarterly updates)
Environmental Protection						
1.2	Municipal Landfill Leachate/ Groundwater Audit	A. Smart	Continue with phase 3 of ground and surface water assessment at permitted landfills; set base condition – improve ability to track potential impacts.	Internal use only	Mar-07	Sept 06 – on track; field work completed
1.2	Hazardous Waste Transport Audit	B. Frank	Conduct preliminary assessment of degree of non-compliance with the HWR regarding the transport of haz waste without licence/ manifest	Haz Waste Transporters;	Mar-07	Sept 06 – inspections complete; analysis and follow-up underway.
Environmental Stewardship						
2.3	Ungulate Winter Range Compliance Review	B. Concise	Follow-up to 05/06 compliance review on mule deer winter ranges – intended to include outreach/promotion components	MoFR; forest licensees	Mar-07	Sept 06 – project charter under development
2.3	Okanagan Lake foreshore habitat regulatory compliance	C. Wilson/ D. Mackey / E. Donald	Compliance promotion activities on sensitive foreshore habitats in Okanagan Lake. ES/ WS/ EOS in partnership with local government	Land owners; local government	Project planning 06/07; Implementation 07/08	Sept 06 – delayed start due to competing priorities.
Water Stewardship						
1.1	Well drilling inspections	F. Allen	5 well drilling site inspections to check compliance with surface seal standards.	companies; internal use	Mar-07	Sept 06 – 3 of 5 inspections completed
1.1; 3.3	Dam Safety	G. Paterson	Audit 20% high hazard and 10% low hazard	Victoria Dam Safety	Mar-07	Sept 06 – high hazard complete.
Conservation Officer Service						
4.2	Interior Lakes Sport Fish Compliance	H. Calder	6 week concentrated sport fishing compliance project	Internal use	Mar-07	Sept 06 – 75 lakes and 2 rivers completed. Analysis of results underway.
1.3	Open Burning Smoke Control Regulation Inspections	I. Roth/ J. Lucy	Planned promotion, verification and enforcement activities in partnership with EP.	Land developers; forest companies	Mar-07	Sept.06 –inspections 50% complete.