

REPORT Forest Certification



BC Timber Sales – 2014/15 SFI Surveillance Audit

Between August 2014 and July 2015 an audit team from KPMG Performance Registrar Inc. (KPMG PRI) carried out a multi-site surveillance audit of BC Timber Sales' operations within selected Business Areas against the requirements of the Sustainable Forestry Initiative® (SFI) 2010-2014 standard. The audit also included a review of the organization's action plans to address the incremental requirements of the 2015-2019 SFI Forest Management standard. To provide for a more efficient audit, an ISO 14001 surveillance audit was conducted at the same time. This Certification Summary Report provides an overview of the process and KPMG's findings.

Description of the BC Timber Sales Organization

BC Timber Sales is an autonomous organization within the Ministry of Forests, Lands and Natural Resource Operations (MFLNRO), with financial and operational independence from Regional and District operations. The organization is comprised of 12 Business Areas with an operational presence in 33 locations across the province, and supports the Ministry's goal of providing British Columbians with sustainable benefits from the commercial use of public forests. BC Timber Sales provides these benefits by planning, developing and selling through auction a substantial and representative portion of the province's annual available timber volume. The bid prices received from auctioned timber drive the Market Pricing System for setting stumpage in coastal and interior operating areas of the province. The organization manages about 20% (16 million m³/year) of the provincial allowable annual cut (AAC). BC Timber Sales does not operate any forest products manufacturing facilities, nor does it have a fibre sourcing program.



BC Timber Sales Certifications

All 12 BC Timber Sales Business Areas are covered under a multi-site ISO 14001 certificate, which is valid until March 11, 2016. The organization also holds a number of single-site CSA Z809 certificates covering portions of 3 Business Areas. BC Timber Sales also holds a multi-site SFI 2010-2014 certificate covering all or portions of its 12 Business Areas that is valid until September 31, 2017.



Scope of the BC Timber Sales SFI Certification

The BC Timber Sales multi-site SFI certificate applies to sustainable forest management planning and practices (roads, harvesting and silviculture) conducted by BC Timber Sales Corporate staff, Business Area staff, licensees/permittees and contractors (LPCs) in all or portions of the following Business Areas:

- Babine Business Area (TBA)
- Cariboo-Chilcotin Business Area (TCC)
- Chinook Business Area (TCH)
- Kamloops Business Area (TKA)
- Kootenay Business Area (TKO)
- Okanagan-Columbia Business Area (TOC)
- Peace-Liard Business Area (TPL)
- Prince George Business Area (TPG)
- Seaward-tlasta Business Area (TST)
- Skeena Business Area (TSK)
- Strait of Georgia Business Area (TSG)
- Stuart-Nechako Business Area (TSN)



A detailed listing of applicable forest management units is included as Appendix B of the BC Timber Sales Provincial Sustainable Forest Management plan at:



At the time of the 2014/15 audit BC Timber Sales had a combined AAC apportionment of 12,134,270 m³ per year within the forest management units covered under its multi-site SFI certificate. This equates to a prorated area under management of 9,970,904 hectares. The 2014/15 audit confirmed that BC Timber Sales had not exceeded its combined AAC apportionment for the most recent reporting year (note that a number of Business Areas are currently in an undercut position relative to their AAC apportionments).

The portions of the BC Timber Sales Business Areas that are included within the scope of the organization's SFI certification are covered by a multi-site sustainable forest management (SFM) plan that addresses the Objectives of the SFI forest management standard and includes a variety of targets in relation to them. In addition, government-approved forest stewardship plans that address both timber and non-timber values are also in place. Various higher level plans developed by government (e.g., Land and Resource Management Plans, etc.) also provide direction to forest management within the areas managed by the organization.

The areas covered by BC Timber Sales SFI certification fall within the following WWF ecoregions: (1) Alberta-British Columbia Foothills Forests, (2) North Alberta Mountain Forests, (3) British Columbia Mainland Coastal Forests, (4) Cascade Mountains Leeward Forests, (5) Central British Columbia Mountain Forests, (6) Central Pacific Coastal Forests, (7) Fraser Plateau and Basin Complex, (8) Muskwa-Slave Lake Forests, (9) North Central Rockies Forests, (10) Northern Cordillera Forests, (11) Northern Pacific Coastal Forests, (12) Northern Transitional Alpine Forests, (13) Okanagan Dry Forests, (14) Pacific Coastal Mountains Icefields and Tundra, (15) Puget Lowlands Forests, and (16) Queen Charlotte Islands.

The forests managed by the BC Timber Sales are predominantly coniferous with the main commercial tree species being Douglas-fir, hemlock (western and mountain), western red cedar, yellow cedar, lodgepole pine, spruce (Sitka, white, black, Engelman and hybrids), grand fir, subalpine fir, balsam fir, western larch and trembling aspen.

The forest management approach employed by BC Timber Sales is based primarily on even-aged management, ground and overhead cable-based harvesting systems, clearcut harvesting with the retention of reserves of standing trees (either within or adjacent to harvest areas), replanting of harvest areas within a few years with a mix of ecologically suited tree species and control of competing vegetation through the use of government-approved chemical herbicides (only some Business Areas) and/or mechanical means. Controls are in place to help reduce reliance on chemical brush control where feasible to do so.

Audit Scope

The ISO 14001 portion of the audit included a limited scope assessment of the BC Timber Sales environmental management system (EMS) against selected requirements of the ISO 14001:2004 standard. The SFI portion of the audit was conducted against the requirements of the SFI 2010-2014 standard, and incorporated a limited scope assessment against the SFI program objectives for:

1. Forest management planning;
3. Protection and maintenance of water resources;
5. Management of visual quality and recreation benefits;
7. Efficient use of forest resources;
14. Legal and regulatory compliance;
15. Forestry research, science and technology;

BC Timber Sales 2014/15 SFI Surveillance Audit Findings

Open non-conformities from previous audits	0
New major non-conformities	0
New minor non-conformities	6
New systemic opportunities for improvement	4

Types of audit findings Major non-conformities:

Are pervasive or critical to the achievement of the SFM Objectives.

Minor non-conformities:

Are isolated incidents that are non-critical to the achievement of SFM Objectives.

All non-conformities require the development of a corrective action plan within 30 days of the audit. Corrective action plans to address major non-conformities must be fully implemented by the operation within 3 months or certification cannot be achieved / maintained. Corrective action plans to address minor non-conformities must be fully implemented within 12 months.

Opportunities for Improvement:

Are not non-conformities but are comments on specific areas of the SFM System where improvements can be made.

18. Public land management responsibilities;
19. Communications and public reporting, and;
20. Management review and continual improvement.

The Audit

- **Audit Team** – The audit was conducted by Dave Bebb, RPF, EP(EMSLA), Sylvi Holmsen, RPF, CA, EP(EMSLA), Dennis Lozinsky, RPF, Yurgen Menninga, RPF, EP(EMSLA) and Craig Roessler, RPF, EP(EMSLA). All of the members of the audit team have conducted numerous forest management audits under a variety of standards including SFI, ISO 14001, CSA Z809 and FSC.
- **Combined 2015 SFI/ISO 14001 Surveillance Audit** – The audit included an on-site assessment of the BC Timber Sales EMS and SFI program. Site visits were made to 5 out of the 12 Business Areas (Cariboo-Chilcotin, Babine, Chinook, Peace-Liard and Stuart-Nechako). In addition, the audit included an assessment of the BC Timber Sales Corporate Office's implementation of the SFI program requirements that are applicable at the corporate level. This level of sampling meets the IAF requirements regarding audit sampling for multi-site certifications with 12 sites. The audit involved a review of selected EMS and SFI records, interviews with a sample of staff, licensees and local stakeholders, and visits to several field sites (59 roads, 48 cutblocks and 43 silviculture sites) to assess conformance with the requirements of the SFI 2010-2014 standard. The SFI portion of the audit took approximately 40 days to complete, 31 of which were spent on-site. The balance of audit time was spent preparing the audit plan, completing off-site reviews of selected documents and records and completing various audit checklists and preparing the main and public summary audit reports.
- **BC Timber Sales' SFI Program Representative** – Rein Kahlke, RPF, BC Timber Sales Certification Officer served as the organization's corporate level SFI program representative during the audit. In addition, the various Certification Standards Officers located at each of the BC Timber Sales Business Area offices included in the audit sample acted as the SFI program representatives at the Business Area level.

Audit Objectives

The objective(s) of the audit were to evaluate the environmental and sustainable forest management system at BC Timber Sales to:

- Determine its conformance with the requirements of ISO 14001:2004 and SFI 2010-2014;
- Evaluate the ability of the system to ensure that BC Timber Sales operations meet applicable regulatory requirements, and;
- Evaluate the effectiveness of the system in ensuring that BC Timber Sales meets its specified SFM objectives.

Use of Substitute SFI Indicators

The SFI portion of the audit involved an assessment of conformance against the applicable objectives, performance measures and indicators included in the 2010-2014 version of the SFI standard. None of the indicators included in the SFI standard were modified or substituted for the purpose of this audit.



BC Timber Sales is an autonomous organization within the Ministry of Forests, Lands and Natural Resource Operations (MFLNRO), with financial and operational independence from Regional and District operations. The organization is comprised of 12 Business Areas with an operational presence in 33 locations across the province, and supports the Ministry's goal of providing British Columbians with sustainable benefits from the commercial use of public forests. BC Timber Sales provides these benefits by planning, developing and selling through auction a substantial and representative portion of the province's annual available timber volume. The bid prices received from auctioned timber drive the Market Pricing System for setting stumpage in coastal and interior operating areas of the province. The organization manages about 20% (16 million m³/year) of the provincial allowable annual cut (AAC).

17. Community involvement in the practice of sustainable forestry;

Audit Conclusions

The audit found that the BC Timber Sales sustainable forest management system:

- Was in full conformance with the requirements of the SFI and ISO 14001 standards included within the scope of the audit, except where noted otherwise in this report;
- Has been effectively implemented, and;
- Is sufficient to systematically meet the commitments included within the organization’s environmental and SFM policies, provided that the system continues to be implemented and maintained as required.

As a result, a decision has been reached by the lead auditor to recommend that BC Timber Sales continue to be certified to the ISO 14001 and SFI 2010-2014 standards.

Evidence of Conformity with SFI 2010-2014

SFI Objective #	Key Evidence of Conformity
1. Forest Management Planning	Sustainable forest management (SFM) plan, forest stewardship plans (FSPs), Timber Supply Review (TSR) results and Allowable Annual Cut (AAC) rationales, AAC apportionments, harvest records, interviews with a sample of BC Timber Sales staff.
2. Forest Productivity	Not in scope for the 2014/15 surveillance audit.
3. Protection and Maintenance of Water Resources	SFM plan, FSPs, EMS operational controls, SPs & LPs, staff and LPC interviews, field site inspections.
4. Conservation of Biological Diversity	Not in scope for the 2014/15 surveillance audit.
5. Management of Visual Quality and Recreational Benefits	SFM plan, FSPs, SPs & LPs, staff and LPC interviews, field site inspections.
6. Protection of Special Sites	Not in scope for the 2014/15 surveillance audit.
7. Efficient Use of Forest Resources	SFM plan, FSPs, staff and LPC interviews, field site inspections.
8. Landowner Outreach	SFI Objectives 8-13 are not applicable as BC Timber Sales does not procure wood fibre.



The audit involved a review of selected EMS and SFI records, interviews with a sample of staff, LPCs and local stakeholders, and visits to field sites located across 5 Business Areas to assess conformance with the requirements of the SFI standard.

SFI Objective #	Key Evidence of Conformity
9. Use of Qualified Resource and Logging Professionals	SFI Objectives 8-13 are not applicable as BC Timber Sales does not procure wood fibre.
10. Adherence to Best Management Practices	SFI Objectives 8-13 are not applicable as BC Timber Sales does not procure wood fibre.
11. Promote Conservation of Biological Diversity, Biodiversity Hotspots and Major Tropical Wilderness Areas	SFI Objectives 8-13 are not applicable as BC Timber Sales does not procure wood fibre.
12. Avoidance of Controversial Sources including Illegal Logging	SFI Objectives 8-13 are not applicable as BC Timber Sales does not procure wood fibre.
13. Avoidance of Controversial Sources including Sources without Effective Social Laws	SFI Objectives 8-13 are not applicable as BC Timber Sales does not procure wood fibre.
14. Legal and Regulatory Compliance	SFM plan and related monitoring results, EMS non-compliance records, field site inspections.
15. Forestry Research & Technology	Records of recent research projects, BC Timber Sales staff interviews.
16. Training and Education	Not in scope for the 2014/15 surveillance audit.
17. Community Involvement in the Practice of Sustainable Forestry	Western Canada SFI Implementation Committee (WCSIC) minutes, records of community outreach, staff interviews.
18. Public Land Management Responsibilities	Agency, stakeholder and First Nations referral correspondence, SPs, field inspections.
19. Communication and Public Reporting	Previous external audit reports.
20. Management Review and Continual Improvement	SFM plan, corporate and Business Area management reviews internal audit reports and associated action plans, staff interviews.



The audit found that the stream crossings (wood box culverts and bridges) on the East Harrison Road were well built with excellent clearance above the channel, ample use of geotextile and minimization of sedimentation. (Chinook Business Area)

Follow-up on Findings from Previous Audits

At the time of this assessment there were a total of 8 open non-conformities from previous ISO 14001/SFI audits that were applicable at the corporate level. The audit team reviewed the implementation of the action plans developed by BC Timber Sales to address these issues, and found that they had been effectively implemented in the majority of instances. However, isolated recurrences of the issues that gave rise to 3 of these non-conformities were again noted during the 2014/15 audit. As a result, 5 of the previously identified non-conformities have now been closed, and the remaining 3 (failure to minimize soil disturbance associated with forest harvesting, weaknesses in the implementation of fuel management requirements and lack of adequate road maintenance/deactivation on 1 site resulting in soil erosion and plugged culverts) have been downgraded to opportunities for improvement.

Good Practices

A number of good practices were identified during the course of the 2014/15 BC Timber Sales ISO 14001/SFI audit. Examples included:

- SFI Objective 3 (riparian management): The audit found that the stream crossings (wood box culverts and bridges) on the East Harrison Road were well built with excellent clearance above the channel, ample use of geotextile and minimization of sedimentation. (Chinook Business Area)
- SFI Objective 4 (conservation of biological diversity): The audit noted a number of large MPB salvage blocks where TSN had done a good job of addressing the Chief Forester's guidance regarding stand level retention in salvage areas. Many of the larger blocks included 15-20% retention in WTRA (Wildlife Tree Reserve Area)s/WTP (Wildlife Tree Patch)s. (Stuart-Nechako Business Area)
- SFI Objective 7 (efficient use of forest resources): Field inspections of harvesting operations noted good levels of utilization of poor quality pine stands that had been impacted by the mountain pine beetle (MPB), but with sufficient slash retained to meet coarse woody debris (CWD) objectives. This was particularly apparent on cruise-based sales. (Cariboo-Chilcotin and Stuart Nechako Business Areas)
- SFI Objective 14 (legal and regulatory compliance): The audit found that many licensees now use iPads or similar devices loaded with block shape files in order to help ensure compliance with site plan requirements and minimize the potential for trespasses. (various Business Areas)
- SFI Objective 14 (legal and regulatory compliance): In the Houston operating area the practice of BCTS staff is to copy pre-work notes onto the back of contractor maps to help ensure that detailed block instructions are always readily available to equipment operators. (Babine Business Area)
- SFI Objective 14 (legal and regulatory compliance): In addition to the pre-work checklist, a separate typed page clearly describing the relevant health, safety, environmental and operational concerns is presented to and signed off by licensees. (Peace-Liard Business Area)
- SFI Objective 14 (legal and regulatory compliance): The newly revised project risk assessment process has been strengthened to better reflect documentation of the monitoring plan approach and is designed to assess/manage the identified risk factors respecting the project (as well as other refinements respecting contractor risk and a requirement for Supervisor review/signoff). (Corporate)
- SFI Objective 16 (training and education): Field inspection of an active herbicide application project found that the crew was well organized and demonstrated good awareness of site and weather conditions impacting their activities. (Cariboo-Chilcotin Business Area)
- SFI Objective 18 (public land management responsibilities): The audit found that a comprehensive, well-structured stakeholder consultation process has been implemented at Haida Gwaii, with very good records of the results of this consultation being generated and maintained. (Chinook Business Area)

NB: The above list of good practices is not intended to be a comprehensive list of all of the noteworthy or progressive forest practices that are taking place at the operations included in the 2014/15 audit sample. Rather, they are simply observations made by the audit team that were deemed worthy of inclusion in this public summary report as a means to highlight some of the positive aspects of the organization's forest management practices.



The audit noted a number of large MPB salvage blocks where TSN had done a good job of addressing the Chief Forester's guidance regarding stand level retention in salvage areas. Many of the larger blocks included 15-20% retention in WTRAs/WTPs. (Stuart-Nechako Business Area)

New Areas of Nonconformity

The 2014/15 BC Timber Sales ISO 14001/SFI audit identified a total of 4 new minor non-conformities in relation to the requirements of the SFI 2010-2014 standard, as follows:

- SFI Performance Measure 2.3 requires the organization to implement forest management practices to protect and maintain forest and soil productivity, including minimizing rutting. Further, EFP 01 requires licensees and/or their workers to follow the project plan, while EFP 05 requires them to minimize excessive soil disturbance. However, the audit found no evidence that a small retention patch located in an area of potentially unstable terrain had been retained by the licensee as prescribed. (Chinook Business Area)
- SFI Performance Measure 3.2 requires Program Participants to develop and implement plans to manage or protect rivers, streams, lakes and other water bodies. In addition, EFP 01 requires licensees and/or their workers to follow the project plan, while EFP 04 requires them to minimize the impact of their activities on water quality and site productivity. However, the audit identified a number of weaknesses in the implementation of riparian management practices during the Chinook Business Area site visit (e.g., failure to fully implement an internal audit action plan related to a ditch that connected a borrow pit to a fish stream; a number of culverts that were prescribed to be installed on an access road that were either not installed or were under-sized). (Chinook Business Area).
- SFI Performance Measure 14.1 requires Program Participants to develop and implement a system to comply with applicable laws and regulations. This requirement is addressed in various BCTS documents and procedures, including Chapter 14 of the BCTS EMS Manual which requires that non-conformities and the associated corrective and preventive actions be tracked in the EMS tracking system (ITS). The audit found that these procedures had been implemented as required in the majority of instances. However, a number of exceptions were noted (e.g., failure to complete an incident report or investigation in relation to a road wash-out that was identified by BCTS staff; lack of evidence in ITS to support the closure of some previous external audit action plans; failure to complete a number of required action plans by the due date specified in ITS). (Cariboo-Chilcotin, Babine and Stuart-Nechako Business Areas)
- Chapter 13 of the BCTS EMS Manual and EOP 02 outline the requirements for BCTS inspections of LPC operations. The audit found that the required BCTS inspections of LPC operations had been completed as required in the majority of instances. However, a number of weaknesses in the completion of licensee inspections by BCTS staff were noted during the audit (e.g., 1 block in the Cariboo-Chilcotin Business Area for which the required number of inspections had not been completed; a final inspection for another block that was conducted when there was still snow on the ground that failed to identify weaknesses in wood utilization, road deactivation and bridge maintenance). (Cariboo-Chilcotin and Peace-Liard Business Areas)

New Opportunities for Improvement

Several opportunities for improvement, many of which were restricted to a single Business Area, were identified during the 2014/15 BC Timber Sales ISO 14001/SFI audit. These have already been reported to BC Timber Sales through the Business Area level ISO 14001/CSA Z809 and ISO 14001/SFI reports that were provided to the organization either on-site or soon after the applicable Business Area site visits took place.



Inspection of a sample of silviculture sites during the 2014/15 audit found that BC Timber Sales continues to meet its obligations to reforest harvested areas within prescribed timeframes.

This corporate level Certification Summary Report only includes systemic (i.e., corporate level and/or multi-Business Area) opportunities for improvement.

The 2014/15 BC Timber Sales ISO 14001/SFI audit identified a total of 4 new systemic opportunities for improvement that related to the requirements of the SFI standard, as follows:

- Isolated weaknesses were noted in relation to the content of site plans and/or pre-work documents (e.g., failure to adequately identify and address the risk of windthrow on 1 block; minor rutting on one site that could have been avoided through improved instructions to the licensee in the site plan or pre-work documents; lack of adequate detail in some pre-work documents). (Chinook and Stuart-Nechako Business Areas)
- Isolated weaknesses were noted in relation to the implementation of road-related riparian management practices (e.g., lack of adequate cross-ditches installed on a block road during road deactivation; failure of a licensee to install any culverts or waterbars on an active road which resulted in erosion of the road surface but no environmental impact; road spoil sites that had been placed on the edge of two S-6 streams in 1 block). (Chinook and Babine Business Areas)
- Isolated weaknesses were noted in relation to the completion and tracking of pre-works and licensee self-inspections (e.g., missing licensee self-inspections for some sites; weaknesses in the tracking of licensee self-inspections by some BCTS staff; failure by some staff to track pre-works in Genus Resources in a consistent manner). (Chinook, Babine, Cariboo-Chilcotin and Stuart-Nechako Business Areas).
- Isolated weaknesses were noted in the management of industrial waste (e.g., old culverts, planting boxes, seedling protectors and a tarp had been left behind on one block; several closed oil pails that had been left on a partially completed block that had been inactive since the winter). (Chinook and Peace-Liard Business Areas)

Findings against the Requirements of the SFI 2015-2019 Forest Management Standard

The following findings were identified in relation to the incremental requirements of the SFI 2015-2019 forest management standard with the organization is required to be in conformance with by December 31, 2015:

- SFI 2015-2019 forest management standard performance measure 11.1 includes a requirement to identify staff and LPC roles and responsibilities in relation to the requirements of the standard. A revised SFI 2015-2019 SFI forest management standard roles and responsibilities matrix template has been developed by BCTS. The intent of this document is to: (1) document how the various BAs address the requirements of the SFI 2015-2019 forest management standard, and (2) assign provincial and BA-specific roles and responsibilities in relation to these actions. However, at the time of the July 2015 Stuart-Nechako site visit the BA had yet to populate the SFI 2015-2019 SFI forest management standard roles and responsibilities matrix. (Stuart-Nechako Business Area)



The forests managed by the BC Timber Sales are predominantly coniferous with the main commercial tree species being Douglas-fir, hemlock (western and mountain), western red cedar, yellow cedar, lodgepole pine, spruce (Sitka, white, black, Engelman and hybrids), grand fir, subalpine fir, balsam fir, western larch and trembling aspen.

- SFI 2015-2019 forest management standard performance measure 11.1 includes a requirement to provide staff with education and training sufficient to their roles and responsibilities under the SFI program. However, at the time of the audit Stuart-Nechako staff had yet to be provided with training regarding their roles and responsibilities under the revised SFI 2015-2019 forest management standard. (Stuart-Nechako Business Area)

Corrective Action Plans

Corrective action plans designed to address the root cause(s) of the findings identified during the 2014/15 audit have been developed by BC Timber Sales and reviewed and approved by KPMG PRI. The next surveillance audit will include a follow-up assessment of these issues to confirm that the corrective action plans developed to address them have been implemented as required.

Focus Areas for the Next Audit Visit

The following issues/potential concerns have been identified as focus areas for the next audit visit:

- Implementation of the action plans developed by BC Timber Sales to address all open non-conformities identified during previous external audits.
- Follow-up on the Business Area-specific EMS issues/potential concerns noted in the applicable 2014-2015 Business Area audit reports.
- Given that an official TSR (Timber Supply Review) has not yet been conducted for the Pacific TSA by the BC Chief Forester, it is not clear that the AAC and TSG's apportionment of the AAC (800,000 m³/yr) has been established at a sustainable level based on full consideration of all appropriate resource, inventory and growth and yield data and analysis.
- Implementation of the BCTS action plan to address the incremental requirements of the SFI 2015-2019 forest management standard by the Business Areas included in the 2015-2016 audit sample.
- Continued progress towards improving the state of forest inventories in higher priority TSAs.
- Results of the Prince George TSA timber supply review process.
- Implementation of proposed changes to the BCTS EMS requiring licensees to follow project plans and provide forest resource professional sign-off on project plan implementation.
- Evaluation of monitoring programs for roads and bridges in Fort Nelson (remaining obligations).



Although a number of the Business Areas located in the central and southern interior of the province are beginning to sell timber sales that include live timber, a significant proportion of the harvest continues to come from pine-leading stands that have been killed by the mountain pine beetle.

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