We Can Do Better; We MUST Do Better

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Just about every environmental consulting company boasts of having a rigorous QA/QC program that ensures the work they do is carefully planned and supervised and the reports they issue are thoroughly reviewed for accuracy and correctness. This is so their clients can be assured of receiving reliable, accurate results and competent advice. But are these QA/QC programs actually as effective as they're believed to be?

During my long career as an environmental engineer/project manager and due diligence professional, I've been tasked with reviewing dozens of Phase I, II and III ESA reports as part of "due diligence" reviews. These have often been related to corporate and/or asset acquisitions and divestitures. These reports have come from numerous companies, many of which are considered high profile leaders in our industry. I regret to report, however, that based on what I've seen, my answer to the above question is, "maybe not".

During my talk, I will present numerous examples of errors, omissions and/or questionable practices that I've found in reports submitted to clients by highly reputable environmental consultants. Of course, I'll anonymize/redact these examples so the identities of the clients and companies/individuals issuing these reports will be kept confidential. I warn, however, that these will not be minor mistakes. In fact, I guarantee attendees will be shocked by at least some of my examples. In presenting this material, I'll raise some very important questions: How could these mistakes have gone unnoticed and uncorrected? Was it just due to human error and/or oversight? Or did other things factor into it? Complacency and overconfidence perhaps? What does the fact that those reports slipped through QC and were submitted to clients and/or regulators say about the effectiveness of the QA/QC programs those companies had in place? Could such reports have slipped through your company's QA/QC protocols? **Maybe they did!**

Consultants may also be interested to learn how some things that are commonly done in ESA reports are viewed by due diligence consultants. What's meant by this is how the omission of certain types of easily reported (but commonly not reported) information can throw the validity of some results into question and cause a due diligence professional to either question or outright dismiss certain types of data and any finding based on that data.

The success of our industry depends a great deal on the amount of faith clients and regulators have in our abilities, expertise and commitment to quality control. It hurts the image of our industry when questionable reports go out to clients and regulators. My goal in presenting this material will be to get consulting companies to question if their QA/QC programs are adequate, and to review/audit their programs and improve them any way they can. I know we CAN do better, and for the sake of our industry and those it serves, **We must do better!**

Roger D. Dunkley

Roger has over 30 years of environmental consulting experience and has expertise in numerous areas of environmental consulting. These include contaminated site assessment and remediation, environmental due diligence assessments, environmental compliance auditing and environmental management systems consulting. Roger's most valuable attributes include his ability to see practical, cost effective solutions to complex problems and to effectively communicate nuanced complex concepts and technical interpretations in ways people from all disciplines and backgrounds can easily understand.

Throughout his career, Roger's keen technical mind and practical approach to problem solving has helped to save his clients significant sums of money. This will be demonstrated in some of the case history summaries given below.

Roger is a professional engineer registered with the Association of Professional Engineers and Geoscientists of Alberta (APEGA) and holds a Bachelor's Degree in Geological Engineering (Geophysics option) from the University of British Columbia. He is also a Certified ISO 14001 Lead Auditor. His strong background in engineering, geology, hydrogeology and geophysics is a major part of why he is able to find practical and cost effective solutions to complex assessment and remediation problems.