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Mr Duncan Pendrigh
Director Operational Support and Compliance
Department of Environment and Primary Industries
PO Box 500
East Melbourne, Victoria 3002



Dear Mr Pendrigh



FOREST AUDIT PROGRAM FINAL AUDIT REPORT – HARVESTING AND COUPE CLOSURE

VicForests welcomes the final report and is pleased that the 2012/13 Forest Audit Program – Harvest and Closure found that harvesting in VicForests coupes complied with almost 93% of applicable audit criteria.

VicForests have reviewed the audit findings and would like to offer the following responses to the recommendations included within the report.

Recommendation 3.1 *That VicForests and DEPI either include a specific soil erosion hazard class map in all coupe files or annotate the geology or other map to indicate the distribution of soil erosion hazard class(es) across the coupe.*

VicForests' Response: A soil erosion hazard assessment and classification is carried out for all coupes and VicForests manages the coupe against the highest erosion class hazard. In effect, this determines the higher level of protection within the Code of Practice for Timber Production 2007 (the Code) to ensure risk of erosion is controlled and water quality is protected. While VicForests records the soil erosion hazard class, soil permeability class and overall water quality risk within the Forest Coupe Plan, VicForests will also include a map recognising that this is a requirement of the Code.

Recommendation 3.2 *That VicForests and DEPI collect and retain evidence of appropriate disposal of any prescribed industrial wastes generated on the coupe (e.g. oil drums, used engine oil, oil filters, oily rags). That evidence may take the form of a waste transport certificate or other relevant document from an Environment Protection Authority (EPA) licensed waste transporter or receiver.*

VicForests' Response: VicForests conducts monthly coupe audits to ensure any rubbish is not left on site. Any non-compliance detected is followed up through corrective actions to ensure coupes are free of rubbish during and after harvest operations. VicForests will consider practical options for collecting evidence of disposal of waste.

Recommendation 3.3 *That VicForests and DEPI include maps in coupe files that annotate the Code waterway class that is applicable to every waterway located within or adjacent to the coupe.*



VicForests' Response: Waterway classes are classified in the field prior to the commencement of harvesting operations. Buffer and filter strips are clearly marked on the ground and identified within the Coupe Plan, which reflect waterway classes. VicForests believes the requirements to classify waterways and the application of protection measures are consistent with the Code.

Recommendation 3.4 *That VicForests develop a standard procedure for demonstrating that risks from Myrtle Wilt have been considered and managed consistently with the Code and MPs on all coupe Myrtle Beech trees are present.*

VicForests' Response: The Code 2.3.4 states that "Where Myrtle Wilt fungus (*Chalara australis*) is known to exist, precautionary measures must be applied to minimise the spread of this pathogen". VicForests takes precautionary measures to reduce the risk of spread by avoiding or minimising damage to Myrtle Beech trees during operations. Myrtle Beech trees are generally found in gullies away from VicForests harvesting operations. However, where operations are carried out in the vicinity of Myrtle Beech trees, VicForests will ensure precautionary measures are taken and adequately documented in the appropriate Coupe Plan.

Recommendation 3.5 *The Code provides for the coupe to extend up to 50 m beyond the mapped TRP boundary where the coupe boundary is a feature that is either not present or not mapped correctly. Where this situation does not apply, it is recommended that the coupe boundary be remarked and/or remapped where it is found to extend more than 10 m beyond the TRP boundary.*

VicForests' Response: A coupe boundary is only marked outside of the Timber Release Plan (TRP) where a feature has been mapped incorrectly within 50m of the TRP. To maintain compliance VicForests will carry out additional training and monitor compliance in its internal auditing program.

Recommendation 3.6 *That VicForests review its regeneration burning planning and practices to identify further opportunities to prevent unintended damage to trees in adjacent coupes.*

VicForests' Response: Section 2.2.2 of the Code states that "Where fire is used in timber production operations, all practicable measures must be taken to protect all areas excluded from harvesting from the impacts of unplanned fire". VicForests believes practicable measures are used during planning and implementation of regeneration burning. The Department of Environment and Primary Industries (DEPI), determines the prescribed burning parameters under which VicForests conducts regeneration burns and must approve these parameters for the burn plan to be approved. Fire trails are constructed and regeneration burn plans address potential risks or escapes. VicForests will continue to ensure practical measures are taken to protect areas excluded from harvesting from the impacts of fire.

Recommendation 3.7 *That VicForests ensure that adequate provision is made to meet planned biodiversity conservation measures during coupe marking, including retention and continuity of long-lived understorey elements and habitat trees within the harvestable area. This may include making provision for windthrow of retained habitat trees, the risk of which is exacerbated by harvesting.*

VicForests' Response: This recommendation was made in relation to two coupes where the net harvested area was similar in size to the gross planned area. In most coupes the net harvested area is much smaller than the planned gross area and long lived understorey elements and habitat trees are protected within excluded areas. VicForests are currently reviewing its planning process and will ensure biodiversity conservation measures are met across the landscape in which it operates.

Recommendation 3.8 *That when VicForests constructs temporary or permanent roads into new coupes, it ensures that the prescribed measures are taken to ensure that roads in the vicinity of streams are drained correctly and that risks of stream crossings to water quality are minimised.*

VicForests' Response: VicForests will conduct an internal audit of stream crossings for the 2012/13 harvested coupes and has already identified this issue as an important business objective and target.

Recommendation 3.9 *That VicForests strengthen communication between its silviculture and harvesting personnel to ensure that cross drainage on coupe infrastructure is quickly reinstated when damaged or disturbed during regeneration operations.*

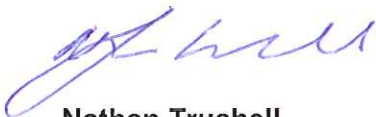
VicForests' Response: VicForests will review its fire trail construction procedures and monitoring record requirements to improve compliance in this area.

Recommendation 5.1 *That VicForests undertake an audit of existing stream crossings along coupe driveways, roadline coupes and other coupe access roads it has constructed to assess the compliance of road design and construction with Code and MP prescriptions aimed at protecting water quality from road drainage. Any non-compliant road drainage should be rectified where this is practicable and will not adversely affect water quality.*

VicForests' Response: As discussed in recommendation 3.9, VicForests will undertake an internal audit of stream crossings for 2012/13 harvested coupes and maintain compliance through monthly coupe monitoring records and the internal audit program.

I would like to thank the auditors for their openness and willingness to engage with VicForests staff during the field audits and look forward to further improvement in audit results in the future.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Nathan Trushell".

Nathan Trushell
Director Corporate Affairs