

Our Ref:
Your Ref:

6 March 2015

Ms. Nina Cullen
Director, Land Management
Department of Environment, Land, Water and Planning
PO Box 500
Melbourne, Victoria 3002

Dear Ms. Cullen

2013/14 FOREST AUDIT PROGRAM FINAL AUDIT REPORT –

Module 1: HARVESTING AND CLOSURE

Module 3: REGENERATION AND FINALISATION

VicForests is pleased that the final audit report for the 2013/14 Forest Audit Program – Regeneration and Finalisation, found that all audited coupes have been successfully regenerated. This finding will see over 4900 hectares accepted by the Department of Environment, Land, Water and Planning (DELWP) as being adequately regenerated and stocked. The Module 1 audit – Harvesting and Closure also audited active coupes as well as recently finalised coupes that ensured all stages of the harvesting cycle were audited.

VicForests has considered all recommendations made by the auditors in the final audit report, and each have been addressed individually in appendix 1 and 2. Comments relating to VicForests operations have been included in appendix 1 and comments relating to operations previously managed by the Department of Environment and Primary Industries (DEPI) Forestry Services have been included in appendix 2.

Following the transfer of operations from DEPI to VicForests in November 2014 and to ensure good forest management and continual improvement, VicForests will take responsibility for all recommendations and issues raised in the final audit report.

I would like to thank DELWP for the opportunity to comment on the final audit report. We look forward to continuing work with DELWP to ensure a successful regeneration and harvesting program over the coming year.

Yours sincerely



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Appendix 1. VicForests' response to recommendations relating to operations on Timber Release Plan coupes

Recommendation VF1: *It is recommended that VicForests reviews the consistency of application of its process for assessment of soil erosion hazard and water quality risk assessment. The review should include a focus on determination of soil dispersability and appropriateness of sampling location, to determine whether intervention such as further training or peer review would improve consistency of outcomes.*

VicForests' Response: VicForests' current procedure for soil assessment addresses recommendation 1, although some discrepancies may have emerged during the audit due to incorrect interpretation of techniques and terminology, and samples being overly saturated due to weather conditions (rain/ snow/ dew). VicForests will review how sampling location is described within our instruction and location requirements.

Recommendation VF2: *It is recommended that VicForests establishes a systematic disease risk and health assessment program for coupes to be harvested, in consultation with DEPI forest health specialists, including assessment of risk of Phytophthora using DEPI's draft risk map, as appropriate.*

VicForests' Response: VicForests will re-assess disease, pest and weed management practices.

Recommendation VF3: *It is recommended that VicForests extends its desktop searches for threatened flora values beyond 500 m from the coupe to the broader catchment or landscape level, until such time as threatened flora models are deemed appropriate for use in this context (refer to Recommendation REG4).*

VicForests' Response: VicForests conducts an overlay analysis of forest values that includes a search of threatened flora and fauna 500m from a planned coupe boundary. This is followed by an on ground inspection by VicForests field staff. VicForests believes its current practices appropriately address management of threatened flora and fauna, and extending beyond 500m will not improve outcomes. VicForests acknowledges the auditors recommendation and will continue to review current practices and implement change where appropriate.

Recommendation VF4: *It is recommended that VicForests reviews, revises and implements its documented procedures to ensure that its operations systematically comply with the Code prescription that "Plans for roads must be based on field surveys to ensure that all environmentally sensitive locations are identified"; and that records are kept of findings (including nil findings) and management actions taken in response to findings.*

VicForests' Response: VicForests' current practices include an initial desktop analysis, followed by a field inspection. The length of the road is marked in the field, during which staff make observations of relevant biodiversity issues. Where a value is identified which requires management, it is recorded within the coupe management system (CENGEA), the coupe plan, the coupe diary or the relevant works plan. Vicforests believes its current practices address recommendation 4, although Roding Instructions and Procedures will be reviewed and changes made where appropriate.

Recommendation VF5: *It is recommended that the responsibilities, standards and procedures associated with the Road Maintenance Agreement 2014 be clearly communicated to VicForests staff responsible for managing roads in the timber haulage network.*

VicForests' Response: At the time of the audit, a change to the current Road Management Agreement was in progress. VicForests will ensure all relevant staff are aware of all applicable requirements.

Recommendation VF6: *It is recommended that VicForests documents and implements a procedure for planning for the regeneration outcome to reflect the species mix and spatial distribution of the forest before harvesting.*

VicForests' Response: VicForests will review its procedures for regeneration that include species mix and distribution and ensure they comply with Victoria's Native Forest Silviculture Guidelines, which are the guiding documents for harvesting and regeneration of native forests within Victoria.

Appendix 2 Responses to issues relating to operations previously managed by DEPI Forestry Services

Recommendation DFS1: *It is recommended that DEPI Forestry Services considers providing specific guidance to forest product licensees regarding felling trees within and adjacent to filters to minimise the number of trees fallen into filters; and removal of logs from filters to minimise soil disturbance.*

VicForests' Response: Operator procedures will be reviewed to provide necessary clarity and, where appropriate, aligned with VicForests' Utilisation Procedures. Once reviewed, the requirements will be communicated with all licensees and operators.

Recommendation DFS2: *It is recommended that DEPI Forestry Services establishes a systematic disease risk and health assessment program for coupes to be harvested, in consultation with DEPI forest health specialists, including assessment of risk of Phytophthora using DEPI's draft risk map, as appropriate.*

VicForests' Response: See response at Recommendation VF2.

Recommendation DFS3: *It is recommended that DEPI Forestry Services extends its desktop searches for threatened flora and fauna values beyond 1 and 2 km respectively from the coupe to the broader catchment or landscape level, until such time as threatened species models are deemed appropriate for use in this context (refer to Recommendation REG4).*

VicForests' Response: See response at Recommendation VF3

Recommendation DFS4: *It is recommended that DEPI Forestry Services documents its procedures for office and field based detection of environmental values, in consultation with DEPI biodiversity specialists.*

VicForests' Response: The detection of environmental values will be documented in alignment with VicForests' documented Instructions and policies. Continued collaboration with DELWP biodiversity staff will be encouraged.

Recommendation DFS5: *It is recommended that DEPI Forestry Services continues to implement improvements in knowledge and implementation of traffic management and road closures.*

VicForests' Response: Interim processes put in place exclude harvesting from at least 40m of road sides where there is no other form of traffic management or road closure. Traffic management will be managed in accordance with VicForests' standard processes into the future.