

Response to the Special Audit basis and findings

It is noted in the executive summary that the map incorporated with the Allocation Order, including the 2014 amendment, “*was the legal mechanism for determining the extent and location of where harvesting could occur*”. VicForests’ position is that the legal mechanism for allocating timber resources is the entire Allocation Order and specifically the following clauses:

- Clause 14 requiring compliance with the Code of Practice for Timber Production 2014 (the Code) and the Code of Practice for Bushfire Management 2012;
- Clause 15 requiring compliance with the forest management zoning scheme established pursuant to applicable forest management plans;
- Clause 18 requiring compliance with the five year harvest area limit included in Table 1; and
- Appendix 1 map.

VicForests considers it has complied with all requirements of the Allocation Order including the specific compliance requirements above. The Special Audit does not identify anything to the contrary.

There is no reference within the Allocation Order to any spatial dataset, or map beyond Appendix 1, that VicForests must comply with. The Department of Environment, Land, Water and Planning (DELWP) recognises this in stating that the spatial dataset used for the Special Audit is “*not legally enforceable*”. Consequently, VicForests cannot accept the basis for the Special Audit and its finding that VicForests has harvested, or planned to harvest, outside of the Allocation Order.

The Special Audit references two spatial datasets; the Working Forest Areas and the wfa_20131001 and implies that these are the same dataset with different names. It is VicForests’ understanding that these two datasets differ from each other and it is unclear which has been used to measure compliance for this Special Audit.

In relation to the analysis of completed timber harvesting, it is unclear on what basis DELWP performed the analysis for the year 2017/18. The Special Audit identifies that volumes were considered from 1 July 2018 until 31 October 2018 as well as 1 October 2013 until 30 June 2017. It would seem that a period of 12 months has not been considered by DELWP in its methodology. Accordingly, VicForests cannot comment upon findings in the 2017/18 year.

The Special Audit identifies a proportion of planned coupes that have some area outside of the Working Forest Areas dataset used. VicForests undertakes its TRP planning using gross area shapes in accordance with the process endorsed by the former Department of Sustainability and Environment. These gross areas will occasionally include unallocated areas, including Special Protection Zone, to enable planning for operations other than harvesting such as roading. The inclusion of these areas supports compliance with the Code.



Response to the Recommendations

VicForests supports and welcomes all recommendations and will work constructively with you and your office to implement the required actions.

In relation to recommendation 2, VicForests would like to work with your office to identify and agree your data requirements and a process to meet your needs.

VicForests is required by the Allocation Order to update the area of timber harvested in the relevant spatial data layer following each financial year and report to the Secretary of the Department of Jobs, Precincts and Regions (DJPR) by the following 30 September. VicForests is happy to supply this report to you at the same time.

Due to the seasonal nature of our harvest operations, and the level of effort involved in undertaking this detailed survey, it is not practicable for this process to be undertaken twice in a year.

However, VicForests considers there are alternative sources of data that are likely to meet your requirements at other points of the year. Depending on your needs, I am happy for this data to be provided more regularly if this is reasonably practicable.

A handwritten signature in blue ink, appearing to be a stylized 'J' or similar character.