

31 March 2020

Chief Conservation Regulator
Office of the Conservation Regulator
Department of Environment, Land, Water and Planning
PO Box 500
Melbourne, Victoria 3002

Dear Ms Gavens,



2019 FOREST AUDIT PROGRAM FINAL AUDIT REPORT

Thank you for the opportunity to respond to the 2018/19 Forest Audit Program (FAP). The FAP is an effective process for driving continuous improvement in both operational planning and practices, and in guiding updates to the regulatory framework which all lead to improved forest management outcomes. The 2018/19 FAP audit focused on operations conducted in the east of the state during the 2017/18 financial year with five audit themes which included:

- Protection of soil, water and biodiversity values
- Execution of in-coupe road design and construction
- Rehabilitation of coupe infrastructure
- Implementation of forest coupe planning
- Coupe regeneration.

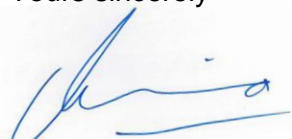
The risk-based coupe selection process adopted for the FAP means that the results are not representative of VicForests' performance or compliance overall for the respective financial year. VicForests is pleased with a conformance score of 92% for coupe planning requirements and 90% for forest regeneration elements, and an overall conformance score of 84% of the applicable criteria, recognising that the audit scope focused on high risk criteria. VicForests recognises there is room for improvement, particularly in the areas of road design and protection of forest soils.

VicForests noted a change of interpretation of some subject areas in this audit, in particular, planned burning impacts on retained areas. VicForests will continue to work with the Department of Environment, Land, Water and Planning (DELWP) to appropriately address these interpretations and the FAP recommendations which will undoubtedly lead to improved forest management outcomes.

VicForests has considered the recommendations made by the auditor and provides a response and proposed actions to address them in Appendix 1.

If you require any further explanation of VicForests response please contact James Gunn, Manager Forest Policy and Compliance at james.gunn@vicforests.com.au in the first instance.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Alex Messina".

Alex Messina
General Manager, Corporate Affairs

Encl.

Appendix 1. VicForests' response to recommendations raised in the 'Audit of timber harvesting operations in Victoria's State forests: Report of the 2018-19 Forest Audit Program'.

Audit Recommendation	VicForests response and proposed actions to address recommendation
<p>V-01: Moderate Priority</p> <p>That VicForests adopt a consistent practice of marking maps of in-coupe waterways with the waterway classification as well as whether a buffer, filter or buffer and filter have been applied.</p>	<p>Response: VicForests has revised and created new map templates in recent times and is aware of inconsistencies associated with implementing the new maps. In regards to identification of waterways on maps, we note it is not a requirement to include the waterway classification on maps, however some staff do include this information. We recognise too that a multitude of different maps are created for different purposes and to display different values.</p> <p>Actions: 1. Ensure that a clear and consistent method for recording waterway classification within coupe plans is being implemented.</p> <p>2. Explore the possibility of formally including waterway classification in one of the existing map templates.</p> <p>Due Date: 30/06/2020</p>
<p>V-02: Moderate Priority</p> <p>That VicForests continue to work with its contractors to ensure that appropriately-spaced drainage structures are constructed on all snig tracks. This means not exceeding the spacings specified in the UPs and not having structures that are unnecessarily close and/or disproportionately large.</p>	<p>Response: VicForests will continue to work with its contractors on this issue.</p> <p>Actions: 1. Implement closer monitoring of drainage structures in coupes over the next 9 months which will raise the awareness of contractors on the specification requirements.</p> <p>Due Date: 30/12/2020</p>
<p>V-03: High Priority</p> <p>That VicForests work with its contractors to minimise disturbances of riparian buffers and filters by snig tracks. Where it is reasonably practicable to do so, snig track crossings of drainage lines and temporary streams should be avoided. Where crossings are necessary, appropriate drainage should be constructed and crossings should be appropriately rehabilitated once the snig track is no longer required.</p>	<p>Response: VicForests was concerned to see this issue arise and will work with its staff and contractors to reduce the likelihood of it recurring.</p> <p>Actions: 1. Re-train operational staff, particularly targeting new staff, on coupe design and regulatory requirements.</p> <p>2. Issue an environmental alert to staff to raise awareness of the issue.</p> <p>Due Date: 30/09/2020</p>
<p>V-04: High Priority</p> <p>That VicForests amend its couple planning and monitoring recording processes to ensure those planning and supervising harvesting operations appropriately assess and manage biosecurity risks associated with machinery movement, the import of gravel for in-coupe roads, Myrtle Wilt and the entry and spread of new weeds.</p>	<p>Response: VicForests recognise biosecurity management as an important aspect of responsible forest management and we understand the important role we play in prevention, recognition, recording and reporting, and control of biosecurity matters.</p> <p>Actions: 1. Review and revise procedures in relation to pests and disease, including monitoring and recording of information.</p> <p>2. Provide training and staff awareness on the issue.</p> <p>Due Date: 30/06/2020</p>

Audit Recommendation	VicForests response and proposed actions to address recommendation
<p>V05: Moderate Priority</p> <p>That VicForests review, and as necessary, revise its UPs to ensure that it instructs contractors to rehabilitate any snig track, landing or other area where machinery has compacted the soil as required by MSP 7.2.2.6 and not just snig tracks and landings.</p>	<p>Response: This audit has highlighted that the wording in our Utilisation Procedures (UPs) that our contractors are required to follow, may allow different interpretation from the requirement within the MSPs.</p> <p>Actions: 1. Instruct contractors on requirements initially until the UPs have been updated. 2. Update wording in the UPs to more accurately reflect requirements in the MSPs.</p> <p>Due Date: 28/02/2021</p>
<p>V-06: Moderate Priority</p> <p>That VicForests develop procedures to track the status of drainage along boundary (or other) tracks that have been constructed or made trafficable for regeneration burning to ensure that drainage is constructed or reinstated once the coupe is burnt or otherwise regenerated, in conformance with MSP 7.2.3.4.</p>	<p>Response: VicForests recognises this has caused an issue on some occasions.</p> <p>Actions: 1. Revise and strengthen procedures to track status of coupe access roads and tracks pre and post regeneration activities.</p> <p>Due Date: 30/09/2020</p>
<p>V-07: Moderate Priority</p> <p>That VicForests develop specific forms (or sections of forms) for its coupe monitoring records that require explicit assessment of in-coupe road and waterway crossing conformance with applicable Code and MSP prescriptions.</p>	<p>Response: VicForests already has specific roading monitoring forms and questions on harvesting monitoring forms about roads and stream crossings. VicForests has begun to implement "focus areas" for monthly monitoring and will include this subject as a focus area.</p> <p>Actions: 1. Make in-coupe roads and waterway crossings a focus area for monthly monitoring assessments. 2. Reassess whether additional questions relating to in-coupe roads and waterway crossings are required on coupe monitoring records.</p> <p>Due Date: 30/09/2020</p>