

14 February 2022

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

Dear OCR,



2020-21 FOREST AUDIT PROGRAM FINAL AUDIT REPORT

VicForests appreciates the opportunity to respond and provide feedback on the 2020-21 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 FAP audit focused on operations conducted in 30 coupes across the Central Highlands, Gippsland and East Gippsland Regional Forest Agreement areas during the 2020-21 financial year with four audit themes which included:

- Environmental values in State Forests
- Conservation of biodiversity
- Operational planning and record-keeping
- Coupe infrastructure for timber harvesting operations

The risk-based coupe selection process adopted for the FAP means that the results are not comprehensive of VicForests' performance or compliance overall for the respective financial year. VicForests is pleased with an average conformance score of 94% against the applicable criteria. VicForests recognises, as always, there is room for improvement, particularly in the areas of road design and construction.

VicForests will continue to engage with the Department of Environment, Land, Water and Planning (DELWP) and other appropriate expertise to appropriately address the FAP recommendations that 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.

I would like to thank OCR for the opportunity to comment on the final audit report.

Yours sincerely

A handwritten signature in blue ink, appearing to read "N. Naylor", written over a faint horizontal line.

Natalie Naylor

General Manager, Legal and Environmental Performance
VicForests

Encl. Appendix 1. VicForests' response to recommendations

Appendix 1. VicForests' response to recommendations raised in the 'Audit of timber harvesting operations in Victoria's State forests: Report of the 2020-21 Forest Audit Program'.

Audit Recommendation	VicForests response and proposed actions to address recommendation
<p>V-01 Medium priority</p> <p>That VicForests undertake an assessment of fire salvage coupes in which live, fire-affected Ash-type eucalypts were retained. The assessment should consider the extent to which such trees survive the effects of fire and offer habitat or other benefits to the coupe when retained and the appropriateness of prioritising more severely burnt trees and forest areas for salvage harvesting.</p>	<p>Response: VicForests Ash fire salvage prescriptions were developed considering the protection of existing, and ongoing recruitment and replacement of habitat trees through the application of VicForests' existing Harvesting and Regeneration, High Conservation Value (HCV) system requirements and review of relevant scientific literature.</p> <p>The retention of dispersed trees provides for a forest structure that better mimics the natural Ash forest structure following bushfire. The retention of all live Ash trees and all dead large hollow-bearing trees provide for both the recruitment of potential future hollow bearing trees and retention of current hollow bearing trees. While the collapse of dead trees is well documented, these can provide a useful habitat for many decades.</p> <p>Actions: VicForests will include a selection of salvage coupes in ongoing post-harvest monitoring.</p> <p>Due Date: Closed</p>
<p>V-02 High priority</p> <p>That VicForests and/or its roading and harvesting contractors develop and implement waterway crossing rehabilitation plans for all temporary in-coupe road and snig track crossings to ensure conformance with the Code and MSPs and reduce, to the extent practicable, the mobilisation of sediment into waterways. Implementation of the plans should be confirmed by VicForests and any defects rectified before all harvesting/regeneration machinery is removed from the coupe.</p>	<p>Response: VicForests is in the process of reviewing processes regarding the rehabilitation of waterway crossing on temporary in-coupe roads and snig tracks. With the goal of creating more detailed supporting documents or instructions on what is considered best practice in managing and rehabilitating waterways crossing within Timber Harvesting Operations</p> <p>Actions: Review and update procedures.</p> <p>Due Date: 29 April 2022</p>

Audit Recommendation	VicForests response and proposed actions to address recommendation
<p>V-03 Medium priority</p> <p>That the data VicForests provides DELWP to assist in coupe selection is based on actual rather than planned in-coupe roads and waterway crossings</p>	<p>Response: VicForests continues to improve the recording of accurate data regarding the temporary infrastructure that is constructed in our Timber Harvesting Operations.</p> <p>The planned coupe access, number and location of landings and number of planned waterway crossings is updated in the VicForests database immediately prior to harvesting (previously initial coupe reconnaissance data was provided). This improved level of data capture has been standard practice for over 2 years, and as these coupes are harvested and are included in the Forest Audit Program, the more accurate data should become apparent.</p> <p>VicForests has also developed a spatial database for recoding this infrastructure. This is being used by most staff, but further training is required to ensure data is consistently recorded. This will add a further check where actual data can be reported.</p> <p>Actions: VicForests to provide further training to staff regarding data collection and recording in relation to coupe infrastructure.</p> <p>Due Date: 29 April 2022</p>