

17 April 2023

[REDACTED]
[REDACTED]
Conservation Regulator
Department of Energy, Environment and Climate Action

By email: [REDACTED]

Dear [REDACTED]



2022 FOREST AUDIT PROGRAM REPORT

Thank you for the opportunity to respond to the recommendations made in the 2022 Forest Audit Program (FAP) report. 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 2022 FAP audit focused on operations conducted in the Central Highlands, East Gippsland, Gippsland and North-East Regional Forest Agreement areas during the 2020/21 financial year with four audit themes which included:

- Protection of soil, water and river health values
- Conservation of biodiversity
- Operational planning and record-keeping
- Coupe infrastructure for timber harvesting operations.

We note that as the FAP utilises a risk-based process to identify and select coupes for audit, 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 96% against the applicable criteria. VicForests recognises, as always, there is room for improvement, and welcomes the audit findings and recommendations in providing advice and direction on areas of focus for such improvement.

VicForests will continue to work with the Department of Energy, Environment and Climate Action (DEECA) 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 the Attachment to this letter.

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



Encl. Attachment: VicForests' response to recommendations.

VicForests' response to recommendations made in the 'Audit of timber harvesting operations in Victoria's State forests: Report of the 2022 Forest Audit Program'.

Audit Recommendation	VicForests' response and proposed actions to address recommendation
<p>V-01: High Priority That VicForests retain records of the full search effort, using surveys and habitat modelling, to identify threatened species that may be present within a coupe or may be affected by nearby harvesting activities.</p>	<p>Response: VicForests already maintains records of survey effort conducted by its staff and contractors, as well as the data from surveys conducted by the Forest Protection Survey Program. The Forest Coupe Plan is produced to provide guidance to the harvesting contractor on the requirements relating to the harvest operation in that coupe as required by the Code and is not a comprehensive list of all searches, surveys and planning work conducted for a particular coupe or its neighbours. The coupe file is the definitive source for the records referred to. VicForests would be happy to provide this detail to the auditor for any future audit.</p> <p>Actions: No further action.</p> <p>Due Date: N/A</p>
<p>V-02: High Priority That VicForests develop and implement an initiative to improve the quality and consistency of waterway crossing design, construction, maintenance and rehabilitation, addressing both in-coupe road and snig track crossings</p>	<p>Response: This recommendation repeats from similar recommendations in earlier FAPs. VicForests has developed and implemented standards for waterway crossing design in response to previous recommendations. We will continue to implement these standards and work to ensure they are applied consistently across the business. We have also implemented an ongoing monitoring and maintenance program.</p> <p>Actions: Provide further training to relevant staff on implementation of waterway crossing design standards.</p> <p>Due Date: 31/07/2023</p>
<p>V-03: Medium Priority That the data VicForests provides to DEECA to assist in audit target selection is based on actual rather than planned coupe conditions. Maximum coupe slope and the presence of modelled rainforest within the coupe rather than within 500m of it are reported</p>	<p>Response: Similar recommendations have been made in previous years and VicForests have taken steps to ensure as far as possible actual coupe values are provided. The data available will continue to improve over time as we record this additional data in our system as current and future coupes are harvested. This data can then be extracted and reported.</p> <p>VicForests provides data that DEECA request and we note that DEECA's requests to date have been for average coupe slope (not maximum), and rainforest present in and within 500m of the coupe.</p> <p>Actions: Work with DEECA to determine the most appropriate and useful data to aid audit target selection.</p> <p>Due Date: 31/01/2024</p>