

COMMENT	EPA response
Groups overall happy with the report but felt that there was more to achieve.	Improvements to audit program are being made based on internal review and comments from stakeholders.
Composition of the audit team was good.	The auditor is the same as last year and his nominated support team has had one change.
EPA should play a greater role in monitoring the implementation of the code.	Responsibility for coupe supervision and monitoring lies with DSE. EPA Victoria has no jurisdiction in this area except where there is actual or potential risk of pollution. However, EPA Victoria will pursue the issue with DSE to see if there is a way in which coupe management issues can be heard.
Risk of harm to the environment from breaches need to be quantified.	The auditor has been requested to determine an approach that will allow a judgment of the assessment of impact from a breach to be made.
Remedial action need to be taken on breaches	A debrief will be held at the end of the audit in each district and issues requiring follow up will be reported to DSE.
Include examination of strategic objectives of the Code.	The examination of the strategic objectives of the Code is outside the scope of the audit but is likely to form part of the review of the Code of Forest Practices (see below).
Include examination of the process of development of the rainforest protection strategies.	Consideration is being given to whether the process of development of rainforest strategies can be incorporated into this year's audit program and how this could be assessed. Rather than awaiting resolution of this issue prior to commencing the audit the program will proceed as planned as this matter can be incorporated into the program at a later date if appropriate.
EPA should undertake code review.	The process for the code review has not been established. EPA Victoria, as part of its responsibilities for audit, will seek to be involved in the Code review.
Audit should report on more of the planning processes within the Code (eg Water yield, sustainable yield, coupe aggregation).	Increased assessment of compliance with planning requirements within the Code is to be included within the scope of the audit. This will include water yield and coupe aggregation across an audited FMA. There is an Expert Independent Advisory Group that will report to the Minister on sustainable yield so this has not been included in the scope for this years audit.
Audits should be conducted and a larger sample and not just on completed coupes (prior to logging, active and immediately following harvesting).	The number of coupes to be audited will be increased from 30 to 35 for 2003/04. In addition, a total of up to 8km of timber harvesting roads will also be audited. A trial of an audit of an active coupe will be undertaken during the current program (subject to industry agreement) and a report on its effectiveness included in the 2003/04 audit report. Assessment of unburnt coupes should allow issues evident on pre-logging coupes (and also other Code issues) to be assessed.
Specialist staff should undertake coupe marking.	Based on the audit results, the auditor may make observations on the training and number of DSE staff involved in timber harvesting if consistent issues are found.
Penalties for Code breaches are not severe enough.	Penalties for code breaches is a legislative issue and not within the audit scope.
Audit should report on implementation of previous years recommendations.	The audit report will include comment on the implementation of the recommendations from the previous audit (consideration of the release date for the 02/03 audit will need to be taken into account).
Areas of low compliance need to be examined in the future.	Selection of coupes for audit will consider focus areas of low compliance from the previous audit.
Continue input of community in selection of Forest Management Areas (FMAs) for audit.	Community interest variable retained for the selection of FMAs for audit.