

COMMENT	EPA response
85 per cent compliance trigger level used by the auditor is not appropriate.	<p>The auditor used a score of 85 per cent or below as a trigger for further discussion within the audit report.</p> <p>EPA will discuss this issue with the auditor for 2005 and if other options for reporting on coupes can be used.</p>
Coupes should be audited before marking, during harvesting and at completion.	<p>Where possible the 2005 audit program will include two active coupes in each of the selected forest management areas (FMAs). As they will be partially complete this will allow some assessment of pre-harvest aspects of coupe management.</p> <p>However, sequential auditing during the life of the coupe would be logistically difficult and limit the audits ability to provide assessment of a range of coupes across Victoria.</p>
More active coupes should be assessed.	The 2005 audit program will include eight active coupes. EPA will ask the auditor to make comment in the value of increasing the number of coupes for the 2006 program in relation to overall sample size and balance with completed coupes.
A greater weighting should be placed on community interest when the auditor selects FMAs.	EPA will pass this feedback onto the auditor for consideration. However, the selection of FMAs needs to consider a range of factors; community interest is one of these and does alter which FMAs are selected.
Audit findings should link to the Code of Forest Practices for Timber Production purpose, principle and objectives.	<p>The code guidelines should provide the basis for the meeting the code objectives. Therefore the focus area scores provide the measure as to whether these goals, and hence, the outcomes are met. Any non-compliance observed by the auditor during assessment is a breach of the code and therefore its objectives.</p> <p>The auditor considers the intent of the code when assessing compliance and includes a measure of this through the Environmental Impact Assessment (EIA).</p>
Audit objective should be widened to encompass assessment of definitions and planning documents (for example code and Forest Management Plans) and investigate the impacts of forestry.	<p>The audit is of the application of the code and not the code itself or associated planning documents.</p> <p>However, the audit is now broader to encompass regeneration processes, active coupes and assessment of harvesting levels in State forest supplying water to Melbourne and will provide information that can be used in reviews of the code.</p>
Audit should be thorough and use code definitions.	Agree, the audit should be thorough and use the associated prescriptions, procedures and definitions of the code. Where specific requirements exist for old-growth forest protection these would be assessed.
Burning operations after harvesting should be better controlled to protect buffers and habitat trees.	The auditor does look at the impact of the burn on retained vegetation. In both the 2003 and 2004 audit reports the auditor made comment on the effect of fire spills outside of the coupe.
Field auditing should occur at regular times each year.	Field auditing times for 2005 reflects those in 2004 (May-June) and approximate 2003 (June-July).
The timeline for the release of the report should be adhered to and stakeholders should have sufficient time to respond.	The scheduled release day for this year's report is November 2005. EPA will endeavour to ensure timelines are adhered to.
Feedback regarding the process should be made available to all stakeholders.	Feedback from all stakeholders will be (grouped) summarised and an EPA response published on this website and distributed to all stakeholders.
Risk-based selection should be explained.	EPA will ask the auditor to explain the coupe selection system in the auditor report, including the bias to higher risk coupes.

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The audit should examine the code and management plans definitions (Cool Temperate Rainforest, riparian buffers, etc.).	The audit focuses on the application of the code and does not assess the code itself. However, the auditor is asked to comment where deficiencies with the code are observed.
The environmental impact assessment (EIA) tool is useful, but some changes are needed, including assessments for each non-compliance, higher weightings for some components (for example, habitat trees).	The use of the EIA will continue. It is only applicable where a direct environmental impact has occurred and so cannot apply to all non-compliances. EPA has asked the auditor to review the EIA tool as part of the 2005 audit with the aim of making improvements and these comments will be raised.
Environmental requirements of the code are not sufficient to provide protection.	The audit focuses on the application of the code and does not assess the code itself. However, the auditor is asked to comment where deficiencies with the code are observed.
EPA should police the results of audits more strongly.	Each year the audit report will include comment from Department of Sustainability and Environment (DSE) on implementation of recommendations made in the reports. Responsibility for coupe supervision and monitoring lies with DSE and VicForests.
Issues identified in the audits are still occurring.	The auditor is asked to report on the implementation of previous recommendations. The audit report has only just been released; DSE and VicForests therefore have limited time to implement the recent recommendations.
Penalties should be applied for code breaches.	Responsibility for enforcement of code breaches rests with DSE and VicForests. EPA doesn't have a role in this area; however, where issues are found this may form part of a recommendation such as the auditor noting the accountability of forest operations managers in 2003.
Selection of areas for assessment should include other parameters (for example contentious coupes, specific areas, previous low compliance).	Audit aims to cover the range of FMAs and forest values across the State so that a picture of compliance across the State with the code can be gained.
Audited coupes should be identified to ensure the responsible forest officer and contractor is accountable.	The purpose of the audit is to identify systemic issues in DSE/VicForests systems of coupe management by assessing compliance of operations against the code. For this reason the individual coupes aren't identified in the report.  Feedback is provided to the responsible forest officer(s) on the day of the audit (on active coupes the contractor may also be present) and at a debrief held at the completion of the audit in a given FMA or district.
Coupe observation days should be undertaken in safe manner.	Agree, EPA has in place a safety plan for observation days and will stop the audit and leave the coupe if required.
Recommendation may not reflect the severity of non-compliance.	These are the auditor's recommendations in relation to the findings.  EPA will pass this comment onto the auditor and also ask that the recommendations be ranked based on priority.
Compliance scores don't accurately reflect the reality on the ground nor the environmental impacts identified by the auditor.	The scoring system developed by the auditor is based on the guidelines within the code. The weighting of scores is therefore necessarily based on the weighting placed by the code itself.  However, the audit does allow for further identification of issues through use of the EIA tool.



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Sample size around 10 per cent is suitable.	The actual number of coupes assessed will depend on a range of factors including difficulty associated with access and geographic spread of coupes. EPA will endeavour to ensure that around 10 per cent of the coupes harvested annually are sampled (including active coupes).
Audit (especially sampling and results) should be statistically valid.	An audit is an assessment of compliance with a strategy or objective; the sample size and methodology will provide sufficient data for management purposes.
Audit should focus on specific areas of the operation (for example buffers and habitat trees).	The audit needs to also look at the appropriate management across a range of other activities in the coupe that also may have an environment impact, for example poor road rehabilitation and construction may results in issues with buffers.