

Department of Sustainability and Environment

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25 March 2004

Mr. David Nicastro
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Our Ref: GP-CF/14/0109

Dear Mr Nicastro

Proposed 2004/07 East Gippsland Wood Utilisation Plan

Thank-you for taking the time to consider the Proposed 2004-07 East Gippsland Wood Utilisation Plan. Your concerns over the consultation process have been noted and forwarded to Forest Management Branch of our Head Office for consideration.

In Appendix 1 you noted that a number of coupes appeared to be in SPZ. These were due to the previous mapping scale and we have revised the boundaries of these coupes to ensure that timber harvesting is not identified as being proposed within SPZ.

I have endeavoured to address each of your queries as follows:

When will the FFG Action Statement be released? A number of rainforest communities have been listed as threatened communities under the FFG Act. These are: Cool Temperate Rainforest, Dry Rainforest (Limestone) Community, Warm Temperate Rainforest (Coastal East Gippsland) Community, Warm Temperate Rainforest (Cool Temperate overlap, Howe Range) Community, Warm Temperate Rainforest (East Gippsland Alluvial Terraces) Community and Warm Temperate Rainforest (Far East Gippsland) Community. The consolidated Action Statement to cover the communities is currently in preparation. For more information, please contact Adrian Moorrees, Manager Threatened Species and Communities on 9412 4232 or via email Adrian.Moorrees@dse.vic.gov.au.

After over 12 years, why has the FFG Action Statement still not been released? The Cool Temperate Rainforest Community has been listed under the FFG Act since 1992. In 1996 and 1997, the other rainforest communities listed above were added to the list. Again, Adrian Moorrees, Manager Threatened Species and Communities would be in a better position to provide an answer to this question.



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It is worth noting that while past timber harvesting has been outlined as a past threat to rainforest, current timber harvesting practices have not been identified in the FFG nominations as a major threat to any of the rainforest communities listed above.

What is the minimum rainforest buffer which is applied in the field? For how long has this buffer been systematically applied? In East Gippsland, the minimum rainforest buffer is 20 metres in accordance with the *East Gippsland Forest Management Plan (EGFMP)* (1995). This buffer is consistent with the requirements of the *Code of Forest Practices for Timber Production (Code)* (1996) which states:

“...in the absence of detailed strategies within an approved Forest Management Plan, which address regional characteristics, the following prescription will apply:...”

The *EGFMP* had been approved when the *Code* was released, and the Plan had addressed the regional characteristics of rainforest in East Gippsland. The buffers prescribed in the *EGFMP* were consistent with the existing *Code of Forest Practices for Timber Production* (1990). This buffer width has been applied at least since the release of the Code in 1990.

1. **How does the DSE measure or quantify “full protection” of nationally significant rainforest stands?**
The core areas of all nationally significant rainforest stands are protected within Special Protection Zones or by prescriptions outlined in relevant Special Management Zone Plans. These Zones and Plans ensure sub-catchment protection of these core areas.

What kind of monitoring mechanisms are in place to determine the effectiveness of rainforest planning strategies, prescriptions and guidelines required by the code? If existent, for how long have these monitoring mechanisms been in use? Code Audits have been run across the State on an annual basis for the last ten years, with results being published in detailed reports since 1997. These audits consider the adherence to prescriptions outlined in the Code and in the *EGFMP*. Since 2003, these audits have been coordinated by the EPA. Forest Management may be better placed to provide a more detailed response to this question (contact Peter McHugh, Regional Manager Forest Management Gippsland on 5172 2111).

Are training schedules available that record the date, place, trainer and number of staff attendees involved in rainforest identification training? All Forestry Victoria staff are trained in the identification of rainforest according to existing prescriptions outlined in the *EGFMP*, prior to being required to identify and mark rainforest in the field. Forest Management and Flora and Fauna staff, including a local DSE botanist with a sound knowledge of rainforest in East Gippsland, coordinate these training sessions. Under these prescriptions, rainforest is closed forest.

As outlined in Appendix G of the *EGFMP* (1995), the working definition of rainforest in East Gippsland is:

Rainforest in the FMA is recognised as forest where the highest proportion of foliage cover is contributed by one or more of the following species:

Warm Temperate character species:

Acacia melanoxylon
Acmena smithii
Elaeocarpus reticulatus
Pittosporum undulatum
Tristaniopsis laurina
Cissus hypoglauca
Rapanea howittiana

Cool Temperate character species:

Acacia melanoxylon
Atherosperma moschatum
Elaeocarpus holopetalus
Notelaea ligustrina
Pittosporum bicolor
Podocarpus lawrencei
Tasmannia sp. aff. *xerophila*
Telopea oreades

Can the VRN obtain the rainforest RSOS, priority zoning maps and other layers listed in the above section (preferably in ArcView Shape file format)? DSE is currently trialing the production of a "Forest Explorer CD" containing series forest data related to specific areas. Michael Sutton, Manager Forest Geographic Information on 9637 8423 or Anna MacWilliams, Project Coordinator on 9412 4872 will be able to provide you with more information on this project.

What are the landscape level rainforest protection prescriptions for the EG FMA? All stands of rainforest that meet the parameters of the prescription in the EGFMP are protected under the *Code of Forest Practices for Timber Production* (1996). As outlined in the EGFMP, sub-catchment protection of core zones of sites of significance for rainforest has been designed using the following principles:

- preference will be given to sites of National, State, and Regional significance in that order of priority.
- preference will be given to core areas that are substantially undisturbed and which also help fulfil conservation guidelines for other values (such as Sooty Owl, Long-footed Potoroo and representation of EVCs or old-growth forest).
- a geographic spread of rainforest areas with sub-catchment protection should be provided across the FMA.
- A lower priority will be given to core areas that are large in relation to the rainforest they include, significantly disturbed, or close to conservation reserves with similar rainforest stands.

Source: page 20, EGFMP (1995)

Application of the guidelines outlined in the Plan ensures that at least 58% of all rainforest in East Gippsland, including the most significant stands, is protected by buffers of around 100 metres or more (EGFMP, 1995).

It should be noted that areas identified as a Site of Significance for Rainforest suggests that the area contains rainforest but not the whole site of significance is rainforest.

How many coupes in Rainforest Sites of Significance have been logged since the introduction of the EGFMP? All coupes harvested since the introduction of the EGFMP have been within General Management or Special Management Zone (following the preparation of an appropriate Management Plan has been prepared). One coupe has been harvested within a SMZ identified for the protection of rainforest. This coupe was harvested in accordance with the Management Plan for this Zone. Forestry Victoria do not keep a record of whether coupes are in those parts of Sites of Significance within General Management Zone or not.

Why has the proposed WUP actually increased the level of logging activity inside RSOS as compared to previous years? No conscious effort has been made to increase the level of timber harvesting within Sites of Significance for Rainforest.

Are the management boundary alterations listed in Appendix 2 of this submission fully documented, involved specialist advice and been approved by the Departmental Secretary in accordance with FMP guidelines? When the East Gippsland Forest Management Plan was completed in 1995, all zoning had been mapped using 1:100 000 base data. In 2003 the Department completed a remapping exercise which up-graded the base data (rivers, contours, roads) from 1:100 000 to 1:25 000. At the same time, a number of corrections were made to the zoning data including:

- the mapping of Heritage Rivers to accurately reflect the *Heritage Rivers (Amendment) Act* 1998;
- extend the buffer on linear reserves beside private property from 100 metres to 200 metres; and
- accurately map flora and fauna and cultural point locations using digital data;

At the same time, some minor changes were made to boundaries of reserves to ensure that where-ever possible the boundaries of all SPZs and SMZs could be readily identified in the field. This mapping was coordinated by Forest Management in consultation with representatives from Flora and Fauna and Forestry Victoria. All refinements were completed without compromising the values of the respective SMZ or SPZ. Prior to endorsing these maps, the Director of Forest Stewardship ensured that no values were compromised by the remapping. Overall, the refinement of the mapping resulted in a nett increase of 3286 ha in the reserve system.

Forest Management can provide you with details of any specific boundary alterations.

2. ***Which RSOS within a SMZ have been logged since the adoption of the EGFMP?*** One coupe within SMZ 843-01 has been harvested since the adoption of the EGFMP. This coupe was commenced in 2001/02 and completed in 2002/03. Harvesting was completed in accordance with prescriptions outlined in EGFMP (1995) and the SMZ Management Plan.

What documentation supports the SMZ planning process? All SMZ plans have been drafted by Forest Management staff in accordance with the requirements outlined in the EGFMP (p 11, 1995). The plans have been reviewed by staff from Forestry Victoria, Forest Management peers and Flora and Fauna staff. Of the 109 Special Management Zones, 50 have been approved for implementation, 33 remain in preparation and 26 have been identified for the Long-footed Potoroo and await policy direction on the management of these sites.

7 Special Management Zones have been identified in the EGFMP for the protection of Sites of Significance for Rainforest (827-01, 830-9, 834-5, 836-2, 837-3, 843-1, 886-1). Management Plans have been prepared for 5 and another is currently out for comment. SMZ 836-2 has also been identified for the protection of the Long-footed Potoroo. No harvesting is permitted in Long-footed Potoroo SMAs pending a review of the Long-footed Potoroo Management Strategy.

How many of the Burgman and Ferguson high-priority rainforest research recommendations have been adopted? A number of the recommendations outlined in the Burgman and Ferguson (1995) report were adopted in the revised Code of Forest Practices for Timber Production (1996) and in the EGFMP (1995) including (but not limited to) the recognition of Mixed Forest as a separate community with specific management prescriptions, use of four levels of protection, ranking of Sites of Significance for Rainforest and sub-catchment protection of the most significant stands of rainforest. Other recommendations continue to be considered by the Department.

In detail, how does the senior forester resolve WUP planning disputes? WUP planning disputes are resolved through consultation with the relevant parties with Forest Management staff as the mediator. Issues raised are considered in relation to Government policies and guidelines and where appropriate, timber harvesting coupes are revised, delayed or removed from the WUP.

How many logging coupes have been removed from proposed WUPs because of public concerns raised via the submission process, since the adoption of the EGFMP? The Statewide WUP Guidelines outline an internal endorsement process for all coupes to be scheduled on a WUP. This internal coupe checking is completed prior to the release of the Proposed WUP for public comment. During this period, a number of coupes are removed or subject to boundary modification to address concerns raised by internal stakeholders. This process generally identifies any coupes that have prescriptive, policy or legislative grounds for removal from the WUP. In the past, interim Long-footed Potoroo zones and the absence of a SMZ Plan have been the key policy reasons for the removal of a coupe from a WUP.

While we do not have a record of the exact number of coupes involved, harvesting of coupes has been delayed on the grounds of Aboriginal cultural heritage issues as a result of the public comment period. Coupes have also been removed from the WUP when a rare species have been “discovered” and harvesting of coupes has been delayed pending the outcome on debates raised during the public comment period.

I have attempted to answer your queries on Wood Utilisation Plan related issues however the following queries are not directly related to the production of WUPs. I have forwarded these queries to Forest Management for their consideration (see Appendix 1):

The VRN formally requests what monitoring and reporting actions are currently being carried out by the DSE?

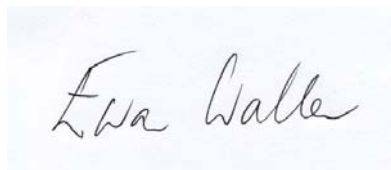
What is the methodology for the “ongoing quality assurance program” currently used? How does this quality assurance program assess the effectiveness of rainforest protection strategies?

Is the quality assurance program open to public scrutiny? If so, how? If not, why?

Has the required 5 yearly RFA review been conducted and public comment sought in accordance with the FMP and RFA performance evaluation provisions?

I trust that the responses above address your concerns. If you have any further queries, please do not hesitate to contact Larissa Murray on 5161 1381.

Yours sincerely

A handwritten signature in blue ink that reads "Ewan Waller". The signature is written in a cursive, flowing style.

Ewan Waller
Manager, Forestry Victoria
Gippsland East