

29 January 2013

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Environment and Communications References Committee  
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### Re: The Wilderness Society Submission Adverse Comment

I write in response to your letter dated 10 January 2013. Thank you for the opportunity to respond to the adverse comment made within the submission by The Wilderness Society Victoria to the Senate Environment and Communication References Committee inquiry into the effectiveness of threatened species and ecological communities' protection in Australia.

VicForests strongly rejects the assertion made by The Wilderness Society Victoria regarding the lawfulness of VicForests' harvesting operations. VicForests also strongly disagrees with a number of the other comments made within the paragraph of the submission provided by to VicForests by the Committee (below).

#### Background

VicForests is a government owned corporation responsible for the harvest, sale and regeneration of State forest within Victoria. VicForests' operations comply with a wide ranging regulatory framework relating to the protection of threatened species and ecological communities. Regulation of VicForests' compliance with this framework is the responsibility the Department of Sustainability and Environment (DSE).

#### Lawfulness of VicForests' operations

VicForests has completed more than 3,000 harvesting operations since being established in 2004 and has never been tried nor found guilty of an offence under any relevant environmental legislation.

In 2012 VicForests was charged by DSE for breaching the regulations relating to Rainforest protection. Subject to VicForests completing a range of actions, the subject of an undertaking, the regulator has agreed to withdraw these charges.

VicForests is regularly audited by a range of internal and external auditors including the DSE and Australian Forestry Standard (AFS). These audits have repeatedly demonstrated a high level of compliance across all of our operations. This ongoing auditing process also contributes to continuous improvements of VicForests Sustainable Forest Management Systems.

#### Resource Projections

VicForests is responsible for determining the volume of timber which is offered for sale from Victoria's State forest. The area available to VicForests within this State Forest is determined by an Allocation Order provided by the Minister for Agriculture and Food Security.

The Allocation Order sets limits on the area of different forest types with can be harvested. VicForests then determines the extent, quality and location of saleable products within these limits.

The process by which VicForests undertakes these assessments is audited by the DSE as a condition of the Allocation Order (below):

*VicForests must advise the Secretary to the Department of Sustainability and Environment of the long term sustainable harvest level that it has calculated from the forest stands to which it has access, and provide to the Secretary to the Department of Sustainability and Environment quality assured data, models and assumptions that it has used in making the calculation for the purposes of audit for compliance with the framework for sustainable forest management in Victoria.*

VicForests releases an updated Resource Outlook annually with these outlooks incorporating a range of factors including the significant impact of the 2009 fires on the available forest resource.

### Yield Calculations

It is unclear on what basis the claim regarding “gross miscalculations in yield” is being made. Unfortunately, without further details VicForests can not respond to this allegation.

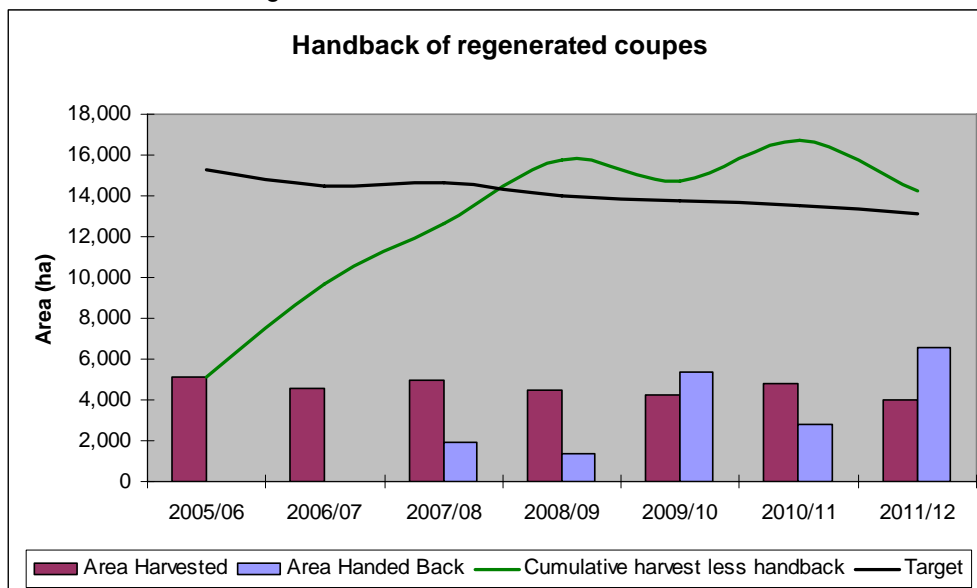
### Regeneration Performance

VicForests is responsible for the regeneration of all areas following harvest and we have a dedicated regeneration team whose role it is to ensure that all areas harvested are re-grown with the same mix of species present before harvest.

After reestablishment of harvested areas, VicForests actively monitors these sites to ensure regeneration is occurring successfully. The results of this monitoring are reported to the DSE who audit the accuracy of information provided prior to accepting ongoing management responsibility for the sites. The monitoring period is typically three years from harvest, hence the initial delay before handback commences. The monitoring period also means that we expect to have three years worth of harvest awaiting handback at any point in time.

VicForests successfully regenerated 6,560 hectares of forest in 2011/12, almost 2,200 hectares more than the area harvested during the last 12 months. Figure one below outlines the harvested areas returned to DSE responsibility since 2004.

Figure One: VicForests Regeneration Performance



Source: VicForests' 2012 Sustainability Report:

<http://www.vicforests.com.au/assets/docs/about%20us/publications/vicforests%20sustainability%20report%202012.pdf>

**Conclusion**

VicForests strongly disagrees with the range of allegations regarding our operations found within the section of The Wilderness Society Victoria's submission to the Committee made available to VicForests.

VicForests welcomes the opportunity to respond to these unsupported claims and to provide a more balanced perspective on these issues. Should you require any further clarification of VicForests' position please contact me.

Yours sincerely,

**Robert Green**

Chief Executive Officer

*Excerpt from Wilderness Society Submission provided to VicForests*

*The SFTA review seeks to vest in the state government's logging agency, VicForests, an unreasonable amount of power. It suggests that VicForests determine the extent and rate of logging in our forests, despite years of failed regeneration, numerous instances of unlawful logging, gross miscalculations in yield, and significant loss, even according to industry, of 10 million cubic metres of stand ash timber in the 2009 bushfires alone.*