

EPA AUDIT REPORT – PERICOOTA STATE FOREST, COMPARTMENTS 26, 27, 31

Auditee:	FORESTRY CORPORATION OF NSW (FCNSW)
Audited State Forest & Cpts:	PERICOOTA STATE FOREST, COMPARTMENTS 26, 27, 31
Region:	Riverina Red Gum Integrated Forestry Operations Approval (IFOA)
Date/Audit timing:	27 May 2015. Audit debrief with FCNSW staff held on 28 May 2015.
Type of audit:	Compliance
Purpose of audit:	Report on the level of compliance with conditions and environmental performance in line EPA compliance priorities.
Audit objectives:	1. Assess compliance against audit criteria that reflect EPA compliance priorities. 2. Assess and categorise risk of identified non-compliance or appropriate further observations. 3. Request action plans against key audit findings so that auditee can use risk categorisation to inform timeliness and level of risk reduction control 4. Promote continuous improvement of the environmental performance of forestry operations.
Audit scope:	• Hollow-bearing and recruitment trees prescriptions • Drainage line protections • Threatened species exclusion zones Physical scope: This audit was limited to the physical boundaries of compartments 26, 27, 31. Temporal scope: The audit period adopted for assessment of compliance with operational conditions was on the day of the audit inspections (27 May 2015).
Audit criteria:	Habitat and Recruitment tree prescriptions • <i>Clause 179; 190; 134(b) retention, selection, protection & mark-up</i> Large Red Gums >120cm • <i>Clause 180</i> Drainage Feature Protection prescriptions • <i>104 and 106 (Burrumbury Creek; Belbins Creek; Pothole Creek)</i> Compartment marking up surveys • <i>Clause 167</i> Exclusion zone mark-up for EZ and buffer zones within scope of audit • <i>Clause 172</i> Glider Sap Trees • <i>Clause 181</i> Raptor Stick Nest

	• <i>Clause 182</i>
Summary of Operations	Operation commencement date: prior to 2015 Silvicultural practice: • Densely stocked young cohorts (80% C31, 75% C26, 50% C27 NHA) – Early thinning • Overmature cohorts (20% C31, 25% C26, 50% C27 NHA) - Single tree selection release, Single tree selection regeneration, Australian group selection (AGS)

1. Audit Findings – Overview

The EPA identified 1 non-compliances and 44 compliances with the IFOA and POEO Act, including determinations of further observations. A summary of EPAs findings are in the table below. Full details and evidence of audit findings can be found in the **Audit Findings Table** in **Attachment 1** including further observations made from the audit.

EPA Compliance Priority 14/15	Audit Scope	Compliant	Non-compliant	Not Determined	Not Applicable
Exclusion Zones	Drainage feature protection	3	0	0	0
	Drainage feature mark-up	2	0	0	0
	Compartment mark-up surveys	0	1	0	0
	Raptor nest protection	0	0	0	1
Hollow bearing and recruitment trees	H and R Retention	2	0	0	0
	H Selection	5	0	0	0
	R Selection	5	0	0	0
	H&R Protection	26	0	0	0
	Large Red gums >120cm	1	0	0	0
	TOTAL	44	1	0	1

2. Audit Recommendations

Condition No.	Number of non-compliances (and sample)	Action Details	Non-compliance Code	Target/Action Date
167.(2) "Compartment mark-up survey" for nests, roosts, dens, scats etc.	1/1	Compartment Mark-up surveys for Threatened Species Features Action Plan to be developed to ensure compartment mark-up surveys are undertaken in accordance with IFOA.	Orange	1 August 2015
110. Logging operations prohibited in drainage protection areas	0/1	Trees removed on boundary of drainage protection area Action Plan to be implemented addressing the removal of boundary trees of protection areas.	Yellow	1 August 2015
Total	1			

3. Audit Conclusions

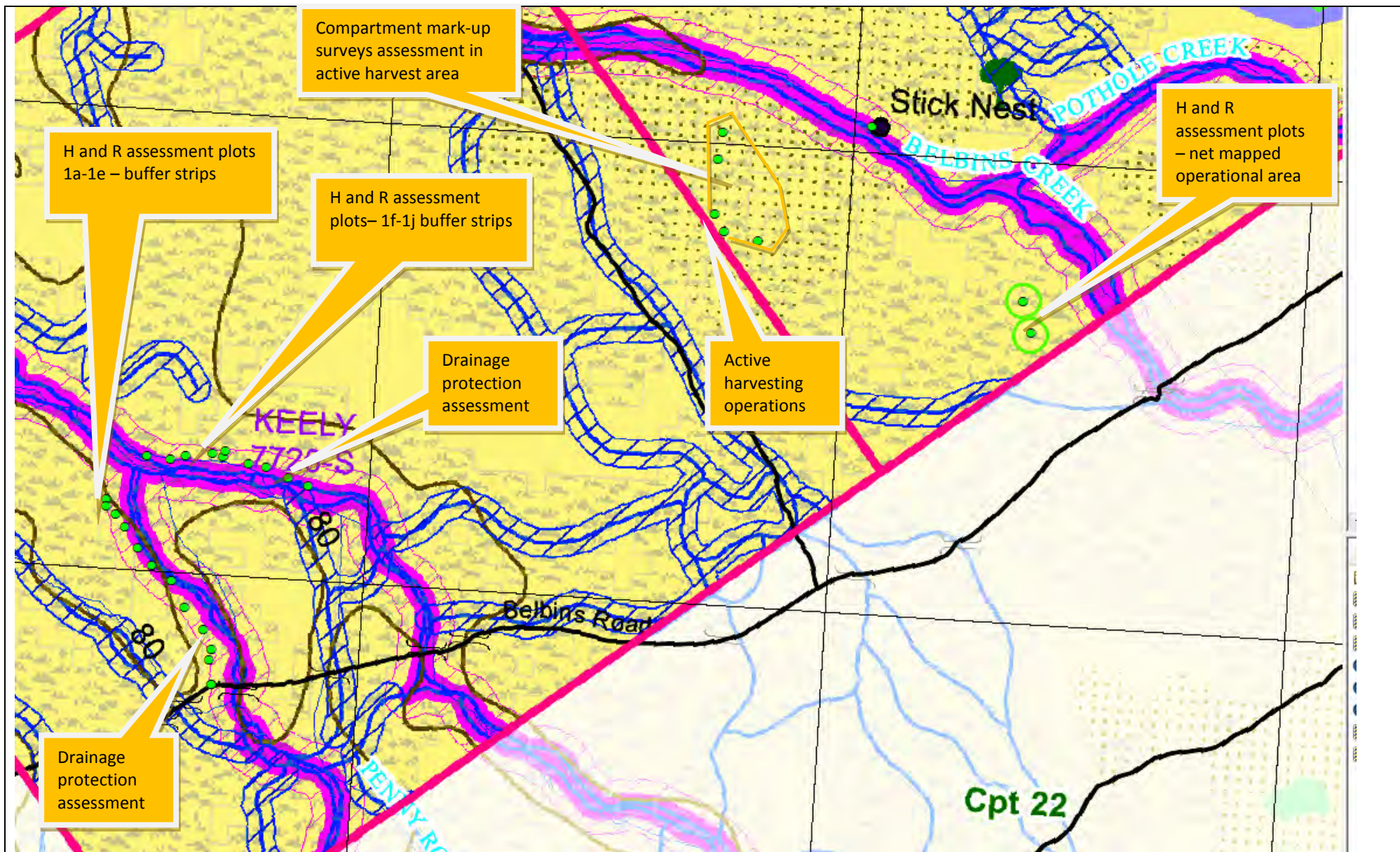
This audit achieved its audit objective by determining compliance with the specified criteria of the audit. The EPA issued FCNSW with the draft audit findings and FCNSW submitted actions to mitigate the non-compliances (Attachment 3). The EPA will follow up on the outcomes of these audits to ensure levels of compliance are enhanced for criteria that relate to this audit.

4. List of Attachments

- Attachment 1) Audit Findings Table
- Attachment 2) EPA Risk Matrix for Non-compliances
- Attachment 3) FCNSW Submission on draft audit findings

ATTACHMENT 1 - EPA DRAFT AUDIT FINDINGS TABLE – PERICOOTA STATE FOREST – COMPARTMENT 26, 27, 31
Assessment of Compliance with Riverina Redgum Integrated Forestry Operations Approval

CONDITIONS RELATED TO RETENTION OF HABITAT AND RECRUITMENT TREES - RETENTION				
Condition No. and Detail	Compliant? Yes/No/Not determined/No t applicable	Number of non- compliance and (sample size)	Why it is important & Risk Ranking Code Explanation	Action required by licensee
Condition 179(1) Forests NSW must ensure that, at the completion of any logging operation, an average of at least two living river red gum habitat trees (as described in subclause (2)) and at least two living river red gum recruitment trees (as described in subclause (3)) remain in each hectare of land within the net mapped operation area.	Yes	0/1		
Comment and Evidence				
This condition was determined as compliant. EPA officers assessed one hectare of net mapped operation area which had been harvested. EPA method used two 40 metre radius circular plots to undertake assessment. Each plot assessed represented approx. half of one hectare. Harvested and retained tree were recorded. Within the hectare assessed, 25 trees had been marked and retained. The marking of these trees was with a ring around the trees and as such did not distinguish the purpose for which that trees had been retained. Of the trees marked and retained, EPA officers determined that that 5 Habitat trees and 5 Recruitment trees had been appropriately selected, marked and retained. Retention rates were therefore 5H/ha and 5R/ha, exceeding the IFOA requirements. Further descriptions of the trees retained is contained in the clauses below.				



Map of EPA Assessment Areas – Attachment One contains waypoint coordinates.



Habitat Tree Marked and Retained

127 cm DBHOB habitat tree with hollows, good crown development, minimal butt damage and belonging to cohort of trees with largest DBHOB. Marked with pink ring. Tree protected during course of harvesting operations.

Waypoint - Plot 2(1)



Recruitment Tree Marked and Retained

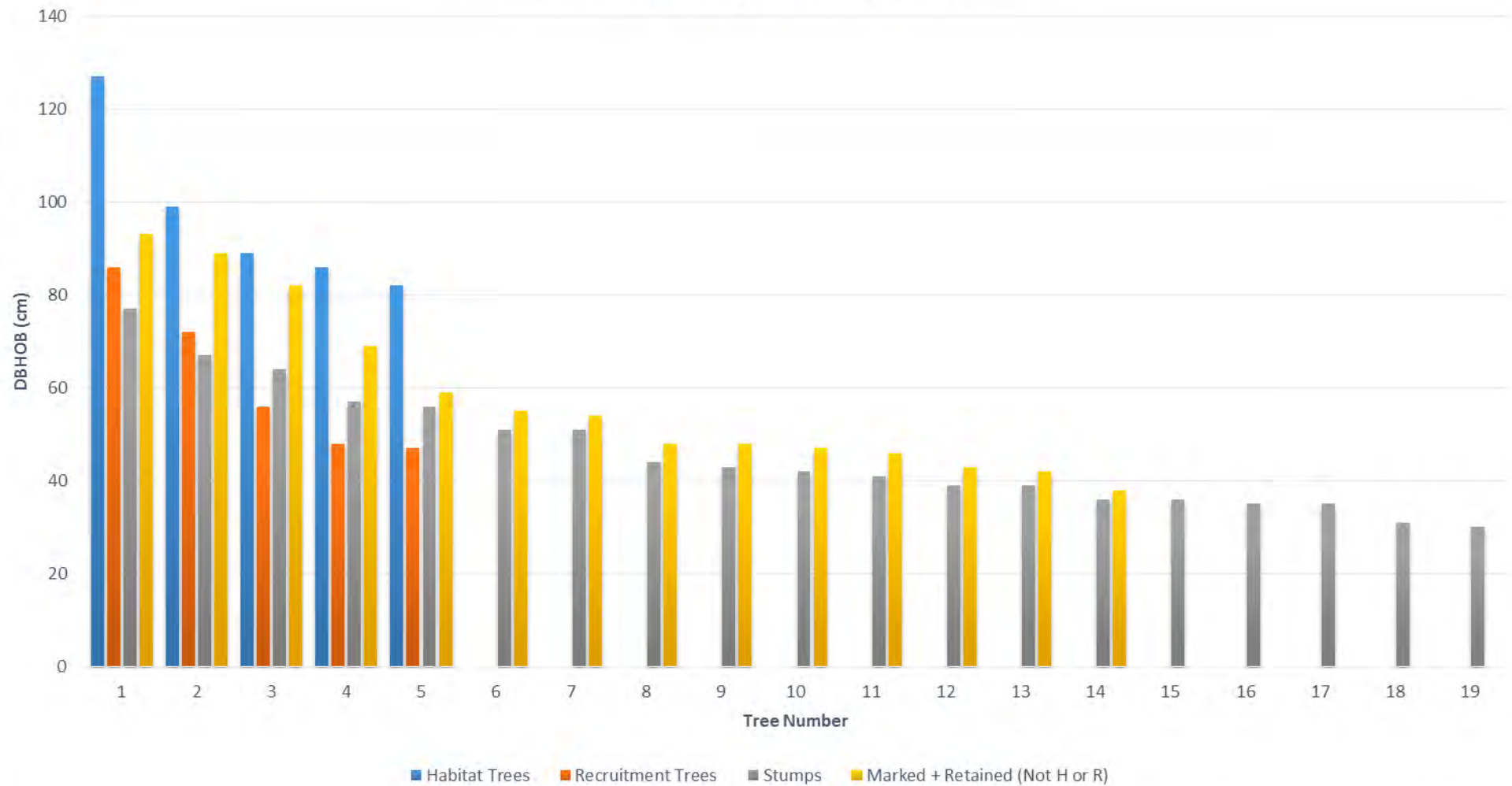
49cm DBHOB recruitment tree considered to be mature, hollow development potential, good crown development, minimal butt damage and dominant crown structure. Marked with pink ring. Tree protected during course of harvesting operations.

Waypoint - Plot 1(b)

CONDITIONS RELATED TO RETENTION OF HABITAT AND RECRUITMENT TREES – HABITAT TREE SELECTION

Condition No. and Detail	Compliant? Yes/No/Not determined/No t applicable	Number of non- compliance and (sample size)	Why it is important & Risk Ranking Code Explanation	Action required by licensee
Condition 179(2) From among the trees in the net mapped operation area, <u>habitat trees</u> must be selected with the objective of retaining trees having as many of the following characteristics as possible: a) hollow-bearing, b) good crown development, c) minimal butt damage, d) belong to a cohort of trees with the largest diameters at breast height over bark. In this clause, “<i>hollow-bearing</i>”, in relation to a tree, means a tree having a base, trunk or limb that contains a visible hollow, hole or cavity or a visible deformity such as a burl, protuberance or broken limb that indicates that a hollow is likely to be present.	Yes	0/5		
Comment and Evidence				
This condition was determined as compliant. EPA officers assessed one hectare of net mapped operation area which had been harvested. EPA method used two 40 metre radius circular plots to undertake assessment. Each plot assessed represented approx. half of one hectare. The assessment area was located east of active operations as shown in the map above. Within the hectare assessed, <u>25 trees</u> had been marked and retained. The marking of these trees was with a ring around the trees and as such did not distinguish the purpose for which that trees had been retained. Of the trees marked and retained, EPA officers determined that that <u>5 Habitat trees</u> had been retained in the assessed one hectare area. The trees retained were all hollowing bearing in that they had clear evidence of hollows, holes or cavity in the base, trunk or limbs. All habitat trees had good crown development (i.e. not suppressed and good crown), with minimal or no butt damage. All habitat trees also belonged to a cohort with the largest DBHOB. The size classes of habitat trees marked and retained is demonstrated in the chart below. All five habitat trees were retained of the cohort of the largest DBHOB. EPA officers collected data on the size of trees cut (20) and removed within the assessed area to compare against tree retained for the purposes of determining the cohort of trees retained and removed. Tree retention exceeded IFOA requirements within the assessed area.				

Habitat and Recruitment Tree Retention - Net Mapped Operational Area



CONDITIONS RELATED TO RETENTION OF HABITAT AND RECRUITMENT TREES – RECRUITMENT TREE SELECTION

Condition No. and Detail	Compliant? Yes/No/Not determined/No t applicable	Number of non- compliance and (sample size)	Why it is important & Risk Ranking Code Explanation	Action required by licensee
Condition 179(3) From among the trees in the net mapped operation area, <u>recruitment trees</u> must be selected with the objective of retaining trees that will develop hollows, being trees having as many of the following characteristics as possible: a) be mature or late mature, b) have potential for developing hollows, c) have good crown development, d) have minimal butt damage, e) be dominant, co-dominant or sub-dominant (but not suppressed).	Yes	0/5		
Comment and Evidence				
This condition was determined as compliant. EPA officers assessed one hectare of net mapped operation area which had been harvested. EPA method used two 40 metre radius circular plots to undertake assessment. Each plot assessed represented approx. half of one hectare. Within the hectare assessed, 25 trees had been marked and retained. The marking of these trees was with a ring around the trees and as such did not distinguish the purpose for which that trees had been retained. Of the trees marked and retained, EPA officers determined that that 5 Recruitment trees had been retained in the assessed one hectare area. The trees considered to be Recruitment trees by EPA were all mature; had potential for developing hollows; exhibited good crown development (i.e. not suppressed and spreading healthy crown), with minimal or no butt damage. All recruitment trees were either dominant, co-dominant or sub-dominant. EPA officers did not consider any marked trees for R tree retention purposes if that tree did not exhibit all the characteristics detailed above in the condition. The sizes of recruitment trees was also considered against the tree removed in the assessed area as demonstrated in the chart below. All five habitat trees were retained of the cohort of the largest DBHOB.				

CONDITIONS RELATED TO RETENTION OF HABITAT AND RECRUITMENT TREES – RETENTION IN BUFFER STRIPS

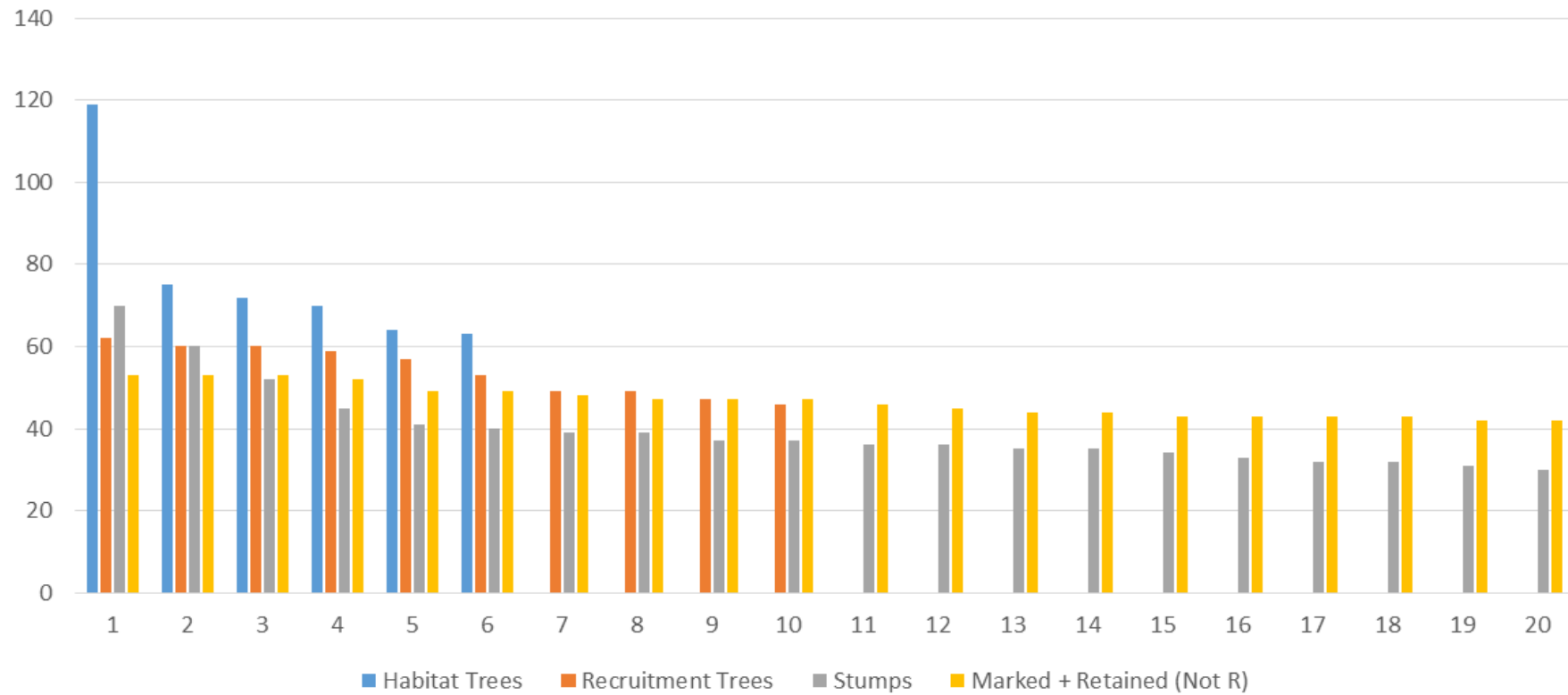
Condition No. and Detail	Compliant? Yes/No/Not determined/ Not applicable	Number of non- compliance and (sample size)	Why it is important & Risk Ranking Code Explanation	Action required by licensee
134. Restrictions in buffer strips Forestry operations may be carried out in buffer strips in accordance with the other Chapters of this approval (as if it were not a buffer strip) but: a) AGS must not be used in any buffer strip; and b) if logging is carried out in a buffer strip, a minimum rate of 5 habitat trees and 5 recruitment trees must be retained per hectare of buffer strip.	 YES YES	 0/1 0/1		
Comment and Evidence				
134(a) - This condition was determined as compliant. EPA officers did not record any AGS applied within buffer strips. Location of buffer strips assessed detailed below. 134(b) – This condition was determined as compliant. EPA officers assessed half a hectare (5000m²) of buffer strips adjacent to Penny Royal Creek within the 30 metre buffer strip required to be applied to this zone. The area had been harvested. EPA method used ten 13 metre radius circular plots to undertake assessment. Each plot assessed represented approx. 500m². The total area assessed was approximately 5000m². Within the assessed area a total of <u>108 trees</u> had been removed by harvesting ranging from DBHOB (adjusted by conservative taper function) 70cm – 5cm. A total of <u>69 trees</u> were marked and retained across the assessed area ranging from 119cm – 20cm in size. The marking of these trees was with a ring around the trees and as such did not distinguish the purpose for which that trees had been retained. <u>Recruitment Trees</u>: Of the trees marked and retained, EPA officers determined that that <u>ten (10) Recruitment trees</u> had been retained in the assessed area. The trees considered to be recruitment trees by EPA were all mature; had potential for developing hollows; exhibited good crown development (i.e. not suppressed and spreading healthy crown), with minimal or no butt damage. All recruitment trees were either dominant, co-dominant or sub-dominant. EPA officers did not consider any marked trees for R tree retention purposes if that tree did not exhibit all the characteristics detailed above in the condition. <u>Habitat trees</u>: Of the trees marked and retained, EPA officers also determined that <u>six (6) habitat trees</u> had been retained in the assessed area. <u>None</u> of the trees had evidence of hollows, however all had good crown development (i.e. not suppressed and spreading healthy crown), with minimal or no butt damage. All habitat trees also belonged to a cohort with the largest DBHOB. The size classes of habitat trees marked and retained is demonstrated in the chart below. EPA officers collected data on the size of trees cut and removed within the assessed area to compare against trees retained for the purposes of determining the cohort of trees retained and removed. All six habitat trees were retained of the cohort of the largest DBHOB. <u>Average Retention Rates in Buffer Strips</u>: Based retention rates achieved across the assessed area the average retention of habitat trees is <u>12H/ha and 20R/ha</u> in buffer strips noting the limited area assessed. This retention rates is above the specified rates of 5 H and 5 R per hectare. Note the table below does not include trees retained and removed less than				

30cm DBHOB.

Buffer Strip Habitat and Recruitment Tree Retention

Habitat Trees (cm – DBHOB)	Recruitment Trees (cm – DBHOB)	Stumps (adjusted by conservative taper function) (cm – DBHOB)	Marked + Retained (Not H or R) (cm – DBHOB)
119	62	70	53
75	60	60	53
72	60	52	53
70	59	45	52
64	57	41	49
63	53	40	49
	49	39	48
	49	39	47
	47	37	47
	46	37	47
		36	46

Habitat and Recruitment Tree Retention - Buffer Strips



CONDITIONS RELATED TO RETENTION OF HABITAT AND RECRUITMENT TREES – RETENTION IN BUFFER STRIPS

Condition No. and Detail	Compliant? Yes/No/Not determined/ Not applicable	Number of non- compliance and (sample size)	Why it is important & Risk Ranking Code Explanation	Action required by licensee
189. Protection of retained trees generally 1. Damage to trees that must not be felled under, or are retained for the purposes of, this Part in a logging operation must be avoided or minimised to the greatest extent practicable in carrying out that operation or any other forestry operation (whether carried out at the same or subsequent time).	Yes	0/26		
Comment and Evidence				
This condition was determined as compliant. EPA assessments recorded a total of ninety-three (93) marked and retained trees across the 1.5 hectare area. The assessment areas included net mapped operational area and within buffer strips as detailed in tree retention provisions above. Of these marked and retained trees it included habitat trees (11) and recruitment trees (15) which are classed as 'protected trees'. There was no recorded instances of damage to these 26 retained habitat and recruitment trees. There was damage to two trees which were marked and retained however these tree were not considered as H or R trees (protected trees).				



Habitat Tree Marked, Retained and Protected

75cm DBHOB habitat tree marked and protected during the course of harvesting operations.

Waypoint - Plot 1(c)

CONDITIONS RELATED TO RETENTION OF HABITAT AND RECRUITMENT TREES – PROTECTION				
Condition No. and Detail	Compliant? Yes/No/Not determined/ Not applicable	Number of non- compliance and (sample size)	Why it is important & Risk Ranking Code Explanation	Action required by licensee
Condition 190(6) Logging debris must be prevented, to the greatest extent practicable, from accumulating within 5 metres of any protected tree during a logging operation. If logging debris does accumulate, then it must be flattened to a height of less than one metre or removed before any post-harvest burning is carried out. However, in flattening or removing the logging debris, disturbance to the ground surface and the understorey must be avoided to the greatest extent practicable. 190(1) In this clause, protected tree means a tree that must not be felled under, or that is retained for the purposes of, this Part. However, in the case of any “koala scat” tree which must not be felled under clause 183, the tree is a protected tree only for the duration of the logging operation referred to in that clause.	Yes	0/26		
Comment and Evidence				
This condition was determined as compliant. EPA assessments recorded a total of ninety-three (93) marked and retained trees across the 1.5 hectare area. Of these marked and retained trees it included habitat trees (11) and recruitment trees (15) which are classed as ‘protected trees’. The assessment areas included net mapped operational area and within buffer strips as detailed in tree retention provisions above. There was no recorded instances of tree debris accumulated greater than one metre within five metres across the 26 protected trees.				

CONDITIONS RELATED TO RETENTION OF HABITAT AND RECRUITMENT TREES – PROTECTION

Condition No. and Detail	Compliant? Yes/No/Not determined/ Not applicable	Number of non- compliance and (sample size)	Why it is important & Risk Ranking Code Explanation	Action required by licensee
Condition 190(7) In carrying out a logging operation, disturbance to the ground surface and understorey within 5 metres of any protected tree must be avoided or minimised to the greatest extent practicable.	Yes	0/26		
Comment and Evidence				
This condition was determined as compliant. EPA assessments recorded a total of ninety-three (93) marked and retained trees across the 1.5 hectare area. Of these marked and retained trees it included habitat trees (11) and recruitment trees (15) which are classed as 'protected trees'. The assessment areas included net mapped operational area and within buffer strips as detailed in tree retention provisions above. Ground disturbance at the base of marked and retained protected trees (habitat and recruitment trees) was considered to be minimised to the greatest extent practicable. There was no evidence of moderate to severe ground disturbance.				

CONDITIONS RELATED TO OF LARGE RIVER RED GUM TREES – RETENTION

Condition No. and Detail	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance and (sample size)	Why it is important & Risk Ranking Code Explanation	Action required by licensee
CONDITION 180. Retention of large river red gum trees A river red gum tree having a dbhob of 120 cm or more must not be felled in a logging operation.	Yes	0/1		
Comment and Evidence				
This condition was determined as compliant. EPA officers located one tree in its assessed areas (1.5 hectares) which was greater than 120cm DBHOB. This trees was marked for retention and protected. Stumps inspected across the assessed area (128 stumps) ranged from 70cm – 5cm DBHOB (adjusted by conservative taper function). No removal of trees greater than 120cm DBHOB was detected. Photo				



Tree >120 cm DBHOB - Marked and Retained

127 cm DBHOB habitat tree with hollows, good crown development, minimal butt damage and belonging to cohort of trees with largest DBHOB. Marked with pink ring. Tree protected during course of harvesting operations.

Waypoint - Plot 2(1)

CONDITIONS RELATED TO DRAINAGE PROTECTION AREAS - PROTECTION

Condition No. and Detail	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance and (sample size)	Why it is important & Risk Ranking Code Explanation	Action required by licensee
110. Logging operations prohibited in drainage protection areas 1. A logging operation to which this Part applies must not be carried out in a drainage protection area, except as provided by this clause.	YES	0/2		
Comment and Evidence				
This condition was determined as compliant. EPA officers assessed two drainage protection areas. One adjacent to Burrumbury Creek and another at Penny Royal Creek. <u>Burrumbury Creek</u>: 200 metre length assessed. No incursions into the drainage protection area detected across assessed length. Area clearly marked and identified with three bar pink marking on trees. Protection area marked ranging from 23 metres from drainage feature up to 33 metres from top of the bank of drainage feature. Requirement of 20 metre protection zone fulfilled. <u>Penny Royal Creek</u>: 250 metre length assessed. No incursions into the drainage protection area detected across assessed length. Area clearly marked and identified with three bar pink marking on trees. Protection area marked ranging from 22 metres from drainage feature up to 31 metres from top of the bank of drainage feature. Requirement of 20 metre protection zone fulfilled.				

Drainage Protection Area – Marked and Protected

EPA assessed 200 metre length of Burrumbury Creek. The drainage protection area was marked clearly with three bar. No harvesting incursions detected.

Note: EPA officer at top of bank (22 metres from marked protection zone)



CONDITIONS RELATED TO DRAINAGE PROTECTION AREAS – MARKING UP

Condition No. and Detail	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance and (sample size)	Why it is important & Risk Ranking Code Explanation	Action required by licensee
172. “Marking-up” of boundaries of protected areas 1. This clause applies to a forestry operation of any of the following kinds if a site specific operational plan is required for the operation: a) a logging operation, b) ancillary road construction. 2. Forests NSW must ensure, as far as practicable, that a forestry operation to which this clause applies does not come within 50 metres of any part of a boundary of an area of land that is protected in relation to that operation (as described in subclause (4)) unless that part of the boundary has been first “marked up”.	Yes	0/2		
Comment and Evidence				
This condition was determined as compliant. EPA officers assessed two drainage protection areas. One adjacent to Burrumbury Creek and another at Penny Royal Creek. <u>Burrumbury Creek</u>: 200 metre length assessed. No incursions into the drainage protection area detected across assessed length. Area clearly marked and identified with three bar pink marking on trees. Protection area marked ranging from 23 metres from drainage feature up to 33 metres from top of the bank of drainage feature. Requirement of 20 metre protection zone fulfilled. Harvesting was evident directly adjacent to drainage protection area. <u>Penny Royal Creek</u>: 250 metre length assessed. No incursions into the drainage protection area detected across assessed length. Area clearly marked and identified with three bar pink marking on trees. Protection area marked ranging from 22 metres from drainage feature up to 31 metres from top of the bank of drainage feature. Requirement of 20 metre protection zone fulfilled. Harvesting was evident directly adjacent to drainage protection area.				

CONDITIONS RELATED TO COMPARTMENT MARK-UP SURVEYS

Condition No. and Detail	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance and (sample size)	Why it is important & Risk Ranking Code Explanation	Action required by licensee
167. “Compartment mark-up survey” for nests, roosts, dens, scats etc. 2. A forestry operation to which this clause applies must not be undertaken on any part of the compartment or other tract of land unless: a) that part, and any area within about 200 metres of that part (including land outside the compartment or other tract of land, if accessible), have first been surveyed in accordance with the requirements of this clause and clauses 155 to 158 (inclusive), and	No	1/1	The likelihood of environmental harm is likely and level of harm moderate. Size was considered relatively large and sensitivity of surrounding area moderate to high.	Action Plan to be developed to ensure compartment mark up surveys are undertaken in accordance with IFOA.
Comment and Evidence				
This condition was determined as not compliant. EPA officers assessed ahead of harvesting operations within 200 metres of active harvesting. There was evidence that the area directly surrounding active harvesting had been ‘marked up’ as demonstrated by the marking of trees for the purpose of retention. It was considered that this area had been assessed for the likelihood of environmentally sensitive elements referred to in conditions 167/168. There was however approximately <u>2.5 hectare</u> area surrounding the harvesting that was not ‘marked up’. This area was up to 200 metres from the furthest extent of active harvesting. There was no evidence of tree marking within this area despite the availability of hollow bearing habitat tree resources. No timber harvesting was detected within these areas that had not been tree marked. Discussions with FCNSW staff including the SFO suggested that this area was being considered whether the area had viable timber or not. The SFO stated that the area had been surveyed but not marked. There was no demonstrable on ground evidence or GPS evidence (tracklog) to support the claim that this area had been subject to “compartment mark-up surveys”. Discussions were held around the associated risks with this practice. <u>Why it is important:</u> Areas which are not subject to compartment mark-up survey are at risk of threatening and/or harming environmentally significant areas. For example, potentially an environmental significant area or species requiring an exclusion zone may be located in areas deemed not viable or for further assessment. potentially the exclusion may radiate back into the operational area and which requires an exclusion of forest operations. Failing to undertake compartment mark-up surveys risks significant non-compliance.				



Compartment mark-up Surveys not done around active area of timber harvesting

EPA officers assessed ahead of harvesting operations within 200 metres of active harvesting. Approximately 2.5 hectare area unmarked and no evidence of survey. Evidence of hollow bearing resources unmarked as shown to left.

CONDITIONS RELATED TO PROTECTION OF RAPTOR NEST - PROTECTION				
Condition No. and Detail	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance and (sample size)	Why it is important & Risk Ranking Code Explanation	Action required by licensee
182. Trees that contain raptor nests must not be felled A tree (whether living or dead) that contains a raptor nest must not be felled in a logging operation.	Not Applicable			
Comment and Evidence				
This condition was determined as not applicable. EPA officers inspected the locations and determined that harvesting operations had not commenced within the vicinity of the location (greater than 200 metres) of the raptor nest as indicated on the harvest operational map. The raptor nest was not located in the field by officers.				

FURTHER OBSERVATIONS TABLE – PERICOOTA STATE FOREST – COMPARTMENT 26,27,31

These are matters that were recorded during the field investigation but relate to conditions outside the audit scope

Relevant Condition	Number of non-compliances and sample	Risk Code	Details of matter	Recommendation
181. Glider sap feed trees must not be felled	0/1	N/A	Threatened Species – Glider Feed Trees Marked and Protected Glider feed trees marked, retained and protected. These had been located during compartment mark-up surveys by the SFO. EPA officer located three feed trees (marked with 'F') throughout its assessed areas. Compliant practice. EPA officers did not inspect site specific operational map to determine if these had been marked on the map. Incisions apparent on tree.	

			 	
110. Logging operations prohibited in drainage protection areas	0/1	Yellow	Trees removed on boundary of drainage protection area Penny Royal Creek. 250 metre length assessed. No incursions into the drainage protection area detected across assessed length EPA detected that three trees were removed on boundary of three bar pink line marking. The EPA considers that the marked boundary line is considered part of the protected area. The trees removed were <u>outside the 20 metre zone</u> as the marked boundary was 25 metres from the top of the bank. Associated risk of potential non-compliance as the boundary is consider the drainage protection area and if this was within 20 metres of drainage top of bank a non-compliance would be recorded.	Action Plan to be implemented addressing the removal of boundary trees of protection areas.

			Trees removed on drainage protection area marked boundary. Two leader stems removed from the three bar marked boundary. The boundary itself was marked 25 metres from the top of the bank and no incursion into the technical drainage protection area. 	

ACTION PLAN – PERICOOTA STATE FOREST – COMPARTMENT 26, 27, 31

Condition No.	Number of non-compliances (and sample)	Action Details	Non-compliance Code	Target/Action Date
167.(2) "Compartment mark-up survey" for nests, roosts, dens, scats etc.	1/1	Compartment Mark-up surveys for Threatened Species Features Action Plan to be developed to ensure compartment mark-up surveys are undertaken in accordance with IFOA.		1 August 2015
110. Logging operations prohibited in drainage protection areas	0/1	Trees removed on boundary of drainage protection area Action Plan to be implemented addressing the removal of boundary trees of protection areas.		1 August 2015
Total	1			

Attachment One: EPA Audit Locations

Drainage Feature Exclusion Zone Assessments

EPA Identifier	Northing	Easting
05-27-2015 12:00:04	6039204	262865
05-27-2015 12:02:36	6039221	262821
05-27-2015 12:04:07	6039240	262773
05-27-2015 12:05:45	6039244	262733
05-27-2015 12:07:22	6039257	262677

Habitat and Recruitment Tree Plot Locations

EPA Identifier	Northing	Easting
Buffer Strips		
1a	6039011	262538
1b	6039048	262505
1c	6039093	262474
1d	6039119	262452
1e	6039150	262431
1f	6039269	262682
1g	6039263	262655
1h	6039255	262598
1i	6039244	262565
1j	6039250	262514
Net Mapped Operational Area		
plot 2(1)	6039698	264387
plot 2(2)	6039631	264408

Compartment Mark-up Survey

EPA Identifier	Northing	Easting
extent harvest	6039809	263730
habitat tree unmarked	6039848	263708
unmarked h tree	6039965	263710
unmarked h tree 200m	6040024	263715
f tree marked	6039794	263805

ATTACHMENT 2 – RISK ASSESSMENT OF NON-COMPLIANCE

The significance of any non-compliances identified during the audit process are categorised. Following risk assessment of non-compliances, an escalating response relative to the seriousness of the non-compliance is determined to ensure the non-compliance is addressed by the enterprise.

The risk assessment of non-compliances involves assessment of the non-compliance against two criteria; the likelihood of environmental harm occurring and the level of environmental impact as a result of the non-compliance. After these assessments have been made, information is transferred into the risk analysis matrix below.

	Likelihood of Environmental Harm Occurring			
Level of Environmental Impact		Certain	Likely	Less Likely
	High	Code Red	Code Red	Code Orange
	Moderate	Code Red	Code Orange	Code Yellow
	Low	Code Orange	Code Yellow	Code Yellow

The assessment of the likelihood of environmental harm occurring and the level of environmental impact allows for the risk assessment of the non-compliance via a colour coding system. A red risk assessment for non-compliance denotes that the non-compliance is of considerable environmental significance and therefore must be dealt with as a matter of priority. An orange risk assessment for non-compliance is still a significant risk of harm to the environment however can be given a lower priority than a red risk assessment. A yellow risk assessment for non-compliance indicates that the non-compliance could receive a lower priority but must be addressed.

There are also a number of licence conditions that do not have a direct environmental significance, but are still important to the integrity of the regulatory system. These conditions relate to administrative, monitoring and reporting requirements. Non-compliance of these conditions is given a blue colour code.

The colour code is used as the basis for deciding on the priority of remedial action required by the licensee and the timeframe within which the non-compliance needs to be addressed. This information is presented in the action program alongside the target/action date for the noncompliance to be addressed.

While the risk assessment of non-compliances is used to prioritise actions to be taken, the EPA considers all non-compliances are important and licensees must ensure that all non-compliances are addressed as soon as possible.

