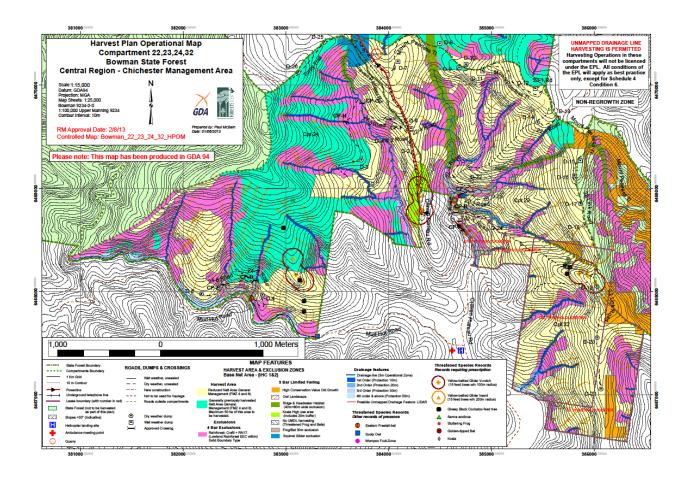
EPA AUDIT REPORT Bowman State Forest, compartments 22,23,24,32

Auditee:	Forestry Corporation NSW		
Audit scope:	Bowman State Forest, compartment(s) 22, 23, 24, & 32 (see Map 1, below). The field audit took two days to complete.		
Region:	Lower North East		
Date/Audit timing:	10 – 11 May 2017 fieldwork; desktop assessment June 2017		
Lead EPA auditor:	John Forcier		
Assisting EPA auditors:	Claire McGarity		
Justification of audit:	EPA Assessment identified operation as High Risk		
Audit objectives:	Undertake an assessment of Threatened Species Licence (TSL) and water pollution compliance within a random sample of landscapes identified in Bowman State Forest Harvest Plan including the following; • Hollow bearing and recruitment trees – retention, selection and protection • High Conservation Value Old Growth • Rainforest EEC boundaries • Water pollution and crossings • Frog and Bat exclusions • Squirrel Glider exclusions • Koala high-use area		
Audit criteria:	 Cond. 5.1 (f) Marking of EZ and buffer zones Cond 5.3 HCVOG protection and mark up Cond 5.4 Rainforest protection and mark up Cond. 5.6 (b) (c) (h) Hollow bearing & Recruitement trees Cond. 5.7 Riparian habitat protection Cond. 6.3 Frog exclusions Cond. 6.14 (a) Koala High Use EZ & intermediate use areas Cond. 6.20 Bat exclusions Cond 5 clause 37 5-30m drainage Sect 120 POEO Act 		
Summary of Operations	Compartment History and Stand Condition These compartments have been harvested a number of times, with the most recent operations occurring across some areas of these compartments within the past 10 years. The areas not harvested in the last 10 years are the areas targeted for this harvesting event. A component of compartment 32 is a newly dedicated section of forest that is included as part of this harvesting operation.		

Operational Map



Map 1: Areas inspected during the EPA audit on Bowman State Forest, compartments 22, 23, 24, and 32.

Table of Contents

Audit Findings - Overview	4
Audit Recommendations	5
AUDIT FINDINGS	6
1. Tree Retention / Mark-up	6
1. Tree Mark-up – Non Regrowth	6
2. Hollow bearing & Recruitment Trees: Selection	8
Comment and Evidence	8
3. Protection of Retained Trees	10
Comment and Evidence	10
Marking-up of boundaries (compartment mark-up)	11
Number of compliances / non-compliances	11
4. High Conservation Value Old Growth - Protection	12
Comment and Evidence	
5. Rainforest Exclusion Zone - Protection	12
Comment and Evidence	
6. Riparian Protection Zones	13
Comment and Evidence	13
7. Ridge and Headwater	13
Comment and Evidence	14
8. Rocky Outcrops	14
Comment and Evidence	16
9. Roads and Crossings	16
Comment and Evidence	16
Threatened Species	17
Comment and Evidence	
10. Stuttering Frog Exclusion Zone	17
11. Koala High Use Area	18
12. Squirrel Glider Exclusion Zone	18
Comment and Evidence	
13. Golden Tipped Bat Exclusion Zone	
APPENDIX B: HOW TO ASSESS AND DETERMINE COMPLIANCE WITH HOL	
BEARING AND RECRUIMENT TREES & PROTECTION OF EXCLUSION ZONES	
Calculating compliances / non-compliances: protection of retained trees	22
Why is it important?	22
Calculating compliances / non-compliances: protection of retained trees	22
Why is it important?	
Risk Assessment of Non-compliance	
APPENDIX: DATA TABLES AND FIGURES	

AUDIT FINDINGS - OVERVIEW

A summary of EPAs findings are shown in the table below.

IFOA condition	Non-compliances	Compliances	Not Determined
5.1(f) Marking of EZ and buffer zones	0	3	0
5.2.2 Koala mark up searches & High use protection	0	1	0
5.3 HCVOG protection and mark up	0	1	0
5.6(b) Retention and Selection of Hollow bearing trees	0	10	0
5.6(c) Retention and Selection of Recruitment trees	1	12	0
5.6(h) Protection of Hollow bearing & Recruitment trees	3	18	0
5.7 Riparian habitat protection	0	2	0
5.8 Ridge and headwater protection	0	0	3
5.11 Rocky Outcrops and Cliffs	0	0	1
6.3 Frog exclusions	0	1	0
6.14(a) Koala High Use EZ & intermediate use areas	0	1	0
5.1a(i) for 6.16 Squirrel Glider exclusions	1	0	0
6.20 Bat exclusions	0	1	0
5 clause 37 5-30m drainage	0	3	0
Section 120 POEO	0	3	0
TOTAL	5	56	4

AUDIT RECOMMENDATIONS

Action Details	Non-compliance Code*	Target/Action Date
5.6(b) and 5.6(c) Hollow bearing &	This non-compliance has an orange risk	Action on this issue must
recruitment tree retention and	category. The likelihood of environment	start immediately and
selection	harm is likely, the unmarked candidate H	must continue until the
No action plan has been developed to	tree should have been identified as the	EPA is satisfied that there
date to ensure that retained trees are	most suitable H in comparison to	is no further risk of non-
protected as per TSL condition 5.6d (i	surrounding forest. The scale of harm is	compliance.
and ii). FCNSW must take more active	moderate.	
measures to improve systems processes		
and undertake any other changes		
necessary to address the problem of tree		
selection.		
5.6(h) Hollow bearing & recruitment	This non-compliance has an orange risk	Action on this issue must
tree protection	category. The likelihood of environment	start immediately and
No action plan has been developed to	harm is likely, because of large amounts	must continue until the
date to ensure that retained trees are	of debris associated with modern logging	EPA is satisfied that there
protected as per TSL condition 5.6h (i	operations. Damage to tree crowns and	is no further risk of non-
and ii). The EPA notes that the issue is	bark is also more likely with mechanised	compliance.
recurring and any actions taken have not	logging. The EPA notes that there is an	
been sufficient. FCNSW must take more	increased risk of fire damage due to the	
active measures to (1) educate its	large amounts of debris. At present, the	
contractors about the need to protect	scale of harm is moderate (considering	
retained trees; (2) supervise logging	rate of incidence and sensitivity of	
operations more vigorously to ensure	environment receptor).	
compliance; (3) improve systems		
processes and undertake any other		
changes necessary to address the		
problem of tree protection.		
5.1a(i) Squirrel Glider exclusions	This non-compliance has a red risk	Action on this issue must
Action plan required to be developed to	category. The likelihood of environment	start immediately and
address the felling of trees within the	harm is certain, the harvesting of the	must continue until the
Squirrel Glider exclusion zone	three trees within a marked glider	EPA is satisfied that there
established under conditions 6.16b)	exclusion is inconsistent with	is no further risk of non-
which is prohibited.	professional operations. The scale of	compliance.
	harm is moderate.	

AUDIT FINDINGS

Tree Retention / Mark-up

1. Tree Mark-up - Non Regrowth

Desktop Analysis

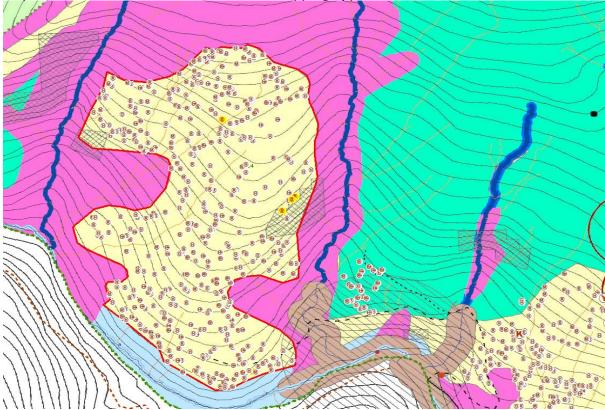
Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance per sample (sample size)	Risk Code	Action required by licensee
TSL 5.6(b) Habitat Trees	Yes	0/1 (161 in 30ha)		Compliant
TSL 5.6(c) Recruitment Trees	Yes	0/1 (156 in 30ha)		Compliant

Field Component

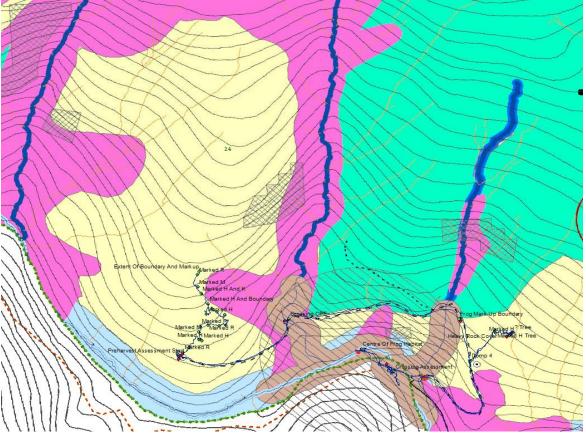
Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance per sample (sample size)	Risk Code	Action required by licensee
TSL 5.6(b) Habitat Trees	Yes	0/1 (9 in 1.65ha – 8.25 required)		Compliant
TSL 5.6(c) Recruitment Trees	No	1/1 (5 in 1.65ha – 8.25 required)	Low	Monitor

FC Mapping Application





Map 2: EPA reconciliation of trees in the field with Trees marked on the mapping application



Comment and Evidence

The EPA conducted an initial desktop analysis Forestry Corporation of NSW hollow bearing and recruitment tree data for the relevant compartments. Harvesting in Bowman State Forest was conducted in a non-regrowth location and the TSL 5.6 requires that 5 habitat trees per hectare are selected and protected. TSL 5.6 also requires that for every habitat tree selected, a suitable recruitment tree is required to be selected.

A 30ha area of net harvest area (NHA) was analysed to find that 161 habitat trees and 156 recruitment trees have been recorded as marked in the field. The analysis identified that within the selected NHA, 5.3 habitat trees per hectare, and 5.2 recruitment trees had been marked up in the field. This random sample identified that sufficient habitat and recruitment trees had been selected for protection.

The EPA conducted a meandering field assessment within the NHA in Compartment 24. The meander covered 1.65ha of *pre-harvest* net harvest area requiring 8.25 habitat and 8.25 recruitment trees to be marked and protected. The EPA recorded 10 H trees and 5 R trees and noted that there were **insufficient recruitment trees** marked up in the sample area.

2. Hollow bearing & Recruitment Trees: Selection

Habitat

Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance per sample (sample size)	Risk Code	Action required by licensee
		1/10		
TSL 5.6 (b)	No	(10 H trees)	Moderate	Monitor

Recruitment

Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance per sample (sample size)	Risk Code	Action required by licensee
		0/5		
TSL 5.6 (c)	Yes	(5 R trees)		Compliant

Comment and Evidence

The EPA assessed 9 hollow bearing and 5 recruitment trees on a 1.65ha meander of net harvest area *prior* to harvest operations.

An additional hollow bearing tree was assessed in another area of pre-harvest mark up the field; making a total of 10 marked H trees and 5 marked R trees assessed.

All hollow bearing trees located during the 1.65ha assessment were assessed to have met condition 5.6 with selected trees containing hollows, broken branches, burls or protuberances with the potential to form hollows. All recruitment trees contained good crowns.

Preharvest assessment area: A location at 382843/6468049 contains a marked blue gum H tree @56cm dbhob that is not consistent with the criteria for H selection compared to other available trees – the crown is still growing with no senescing, there were no visible hollow, broken branches or protuberances. Located 15 meters from the marked H tree is an unmarked 252cm circumference (82cm dbhob) blue gum candidate H with burls and protuberances. (FCNSW noted that this tree would not be harvested at a later field debrief)



WHY IS COMPLIANCE WITH THIS TSL CONDITION IMPORTANT?

Largest Size Cohort: The presence, abundance and size of hollows are positively correlated with tree basal diameter, which is an index of age (Lindenmayer et al. 1991a, Bennett et al. 1994, Ross 1999, Soderquist 1999, Gibbons et al. 2000, Shelly 2005). Tree diameter at breast height (DBH) is, in turn, a strong predictor of occupancy by vertebrate fauna (Mackowski 1984, Saunders et al. 1982, Smith and Lindenmayer 1988, Gibbons et al. 2002, Kalcounis-Rüppell et al. 2006). The minimum size-class at which trees consistently (>50% of trees) contain hollows varies depending on the species and environmental conditions, yet is always skewed toward the larger, more mature trees. (Reference: Loss of Hollow-bearing Trees key threatening process determination NSW Scientific Committee - final determination (2007))

3. Protection of Retained Trees

Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance per sample (sample size)	Risk Code	Action required by licensee
TSL 5.6 (h)	Not Compliant	3/18 (13 H & 5 R trees)	Orange - Likely to occur with moderate damage	An action plan must be developed and implemented to ensure H&R trees are protected at all times.

Comment and Evidence

In addition to the trees inspected for hollow bearing and recruitment selection, the EPA located 3 marked and retained trees in an area of net harvest area that were surrounded by a significant amount of debris. The licence requires that logging debris must not exceed 1 meter in height within 5 metres of marked trees.

Such excessive loads of logging debris at the immediate based of retained hollow bearing is a significant fire risk to that tree. It threatens the tree's longevity and its future as forest habitat and a valuable forest resource





Marking-up of boundaries (compartment mark-up)

This part of the audit focuses on marking-up requirements contained in Condition 5.2 of the Lower North East Region TSL. This audit included:

- High conservation value old growth forest (HCVOG);
- Rainforest;
- · Rocky Outcrops and Cliffs; and
- Exclusion zones around a range of threatened fauna

Number of compliances / non-compliances

EPA assessed boundary mark up as part of each specific condition reviewed. The EPA found that FCNSW was **compliant** with the above conditions in the area assessed.

The EPA records a single compliance finding in relation to compartment mark-up, for each compartment that is marked-up according to the TSL. If there are areas that have not been marked-up in the compartment, the EPA will record zero compliances, along with a single non-compliance for each un-marked area or feature.

4. High Conservation Value Old Growth - Protection

Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance sample (sample size)	Risk Code	Action required by licensee
<u>TSL 5.3</u>	Compliant	0/1 (300m of boundary)	n/a	n/a

Comment and Evidence

This finding is based on the assessment of 300m of a boundary on the Mt Peerless track. The location is also inclusive of an owl landscape. No evidence of harvesting was located. EPA recorded a single compliance for the segment.

The EPA found that FCNSW was **compliant** with the relevant conditions in the area assessed.

5. Rainforest Exclusion Zone - Protection

Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance sample (sample size)	Risk Code	Action required by licensee
<u>TSL 5.4</u>	Compliant	0/1 (200m of boundary)	n/a	n/a

Comment and Evidence

The EPA assessed several rainforest boundaries with audit compartments. Officers located a single cut stump at 38600, 6269120. This location is on the border of a rainforest exclusion boundary, and the EPA considered on the balance of probabilities that this was compliant.



Rainforest Exclusion Boundaries found to be marked and compliant

6. Riparian Protection Zones

Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance sample (sample size)	Risk Code	Action required by licensee
TSL 5.6	Compliant	0/2 (150m of boundary)	n/a	n/a

Comment and Evidence

This finding is based on the assessment of 150m of a first order drainage riparian protection zone in compartment 24. The riparian buffers were assessed in two (2) separate segments. EPA recorded a single compliance for each segment, resulting in a total of two compliances.

The EPA found that FCNSW was *compliant* with the relevant conditions in the area assessed.

7. Ridge and Headwater

Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance sample (sample size)	Risk Code	Action required by licensee
TSL 5.8	Not determined	0/3	n/a	n/a

Comment and Evidence

Three ridge and headwaters are mapped on the HPOM. EPA officers determined that none of the ridge and headwaters were located in current harvesting operations areas and harvesting had not been conducted in their vicinity. Compliance was **not determined**.

8. Rocky Outcrops

Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance sample (sample size)	Risk Code	Action required by licensee
<u>TSL 5.11</u>	Not determined	0/1	n/a	Discussions with FCNSW external to audit



Areas to be assessed for rocky outcrop presence



Areas to be assessed for rocky outcrop presence



Areas to be assessed for rocky outcrop presence

Comment and Evidence

EPA officers located a rocky area at 382843/6468049 which was marked up with H, R and M (merchantable) ahead of operations (pre-harvest) which on initial assessment may meet the Condition 5.11 definition of a rocky outcrop.

This location has been referred to FCNSW and is currently out of audit scope.

Compliance or non-compliance could not be determined.

9. Roads and Crossings

Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance sample (sample size)	Risk Code	Action required by licensee
EPL Schedule 5 S120 POEO	Compliant	0/2	n/a	n/a

Comment and Evidence

EPA officers assessed two marked crossings, CP-D and CP-E; and an unmarked crossing at 383493, 6469195. CP-D and CP-E were found to be compliant.

The unmarked crossing was located on a snig road within a mapped rainforest and traversed a mapped second order stream. The crossing was drained on both sides, however it was disturbed. EPA recognises vehicle access is no longer possible with crossbanks formed between the crossing and log dump 3. This crossing assessed as a compliant under the EPL. The EPA make a single compliance / non-compliance finding in relation to each assessed crossing.





Threatened Species

Comment and Evidence

The EPA conducted assessments of mark-up and protection for several records located on the HPOM including the following:

- Squirrel Glider
- Eastern Freetail Bat
- Stuttering Frog
- Koala

10. Stuttering Frog Exclusion Zone

Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance sample (sample size)	Risk Code	Action required by licensee
TSL 6.3	Compliant	0/1 (150m of boundary)	n/a	n/a

One section of stuttering frog exclusion zone approximately 150m long was investigated for this audit. No incursions of forestry activities or debris were found inside the exclusion zone.



11. Koala High Use Area

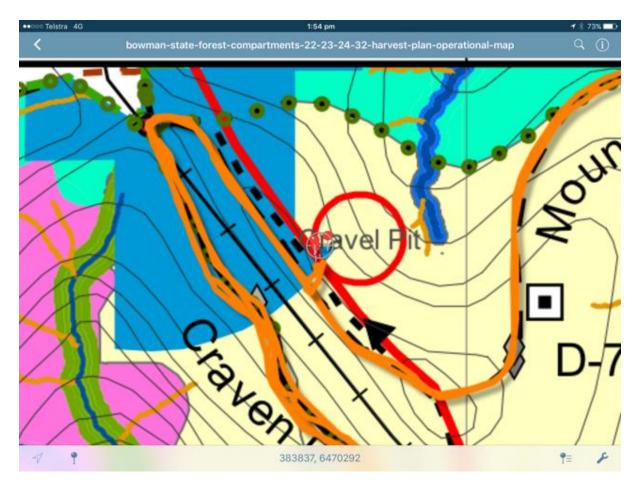
Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance sample (sample size)	Risk Code	Action required by licensee
TSL 6.14	Compliant	0/1	n/a	n/a

One Koala High Use Area was mapped in the audited compartments. The area was found to be undisturbed and **compliant**.

A single koala was sighted by EPA Forestry officers located in a large tallow wood and was referred to FCNSW for actioning a koala star search.

12. Squirrel Glider Exclusion Zone

Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance sample (sample size)	Risk Code	Action required by licensee
TSL 5.1a(i) TSL 6.16	Non-Compliant	1/1	High Risk	FCNSW to ensure harvest operators use GPS systems in a competent manner relative to the conditions and known GPS deficiencies. This matter may be investigated outside the audit.



Comment and Evidence

EPA officers located 3 cut stumps within a squirrel glider exclusion located at 383846, 6470285 and recorded 3 **non-compliances**. FCNSW had detected and reported the non-compliance prior to audit. The stumps were located approximately 3 meters inside the edge of the exclusion zone. EPA notes that FC have declared the error as a result of GPS error, however FCNSW is unclear what the nature of the error was.



Three trees were found to have been harvested from within the mapped squirrel glider exclusion zone.

13. Golden Tipped Bat Exclusion Zone

Condition No.	Compliant? Yes/No/Not determined/Not applicable	Number of non- compliance sample (sample size)	Risk Code	Action required by licensee
TSL 6.20	Compliant	0/1 (150m of boundary)	n/a	n/a

EPA officers inspected approximately 150m of Golden-tipped bat exclusion zone approximately 150m long as a part of this audit. The exclusion zone was found to be marked up and adequately protected the potential habitat for this species around the stream.

APPENDIX B: HOW TO ASSESS AND DETERMINE COMPLIANCE WITH HOLLOW BEARING AND RECRUIMENT TREES & PROTECTION OF EXCLUSION ZONES

Tree Mark-up and Selection

This part of the audit focused on retention of hollow-bearing trees (H trees), recruitment trees (R trees), feed trees and any other trees that must be retained under the relevant IFOA / TSL conditions. For the purposes of this audit, the following requirements apply:

- At least five hollow-bearing trees must be retained per hectare. Where there are fewer than five hollow-bearing trees per hectare, additional trees must be retained as hollow-bearing trees to meet the required rate (Condition 5.6(b) of the TSL non-regrowth zone);
- At least five recruitment tree must be retained per hectare (Condition 5.6(c) of the TSL non-regrowth zone);
- Retained H and R trees must be marked for retention (Condition 5.6(h)(iii) of the TSL).

Calculating compliances / non-compliances: tree retention

The EPA makes a single finding of compliance or non-compliance for tree retention in relation to the entire net harvest area. This is in line with the TSL Condition 5.6, which requires certain numbers of trees to be retained per hectare. In other words, there is no requirement for a certain number of hollow-bearing and recruitment trees to be retained in each hectare. Rather, the requirement is for a minimum number of trees per hectare of net logging area. To determine compliance with this requirement, the EPA surveys a minimum of two hectares within net logging area and calculates an average number of retained trees per hectare of survey area. While this does not capture all of the net logging area, the EPA considers it sufficient for the purposes of an audit (see also the definition of an audit at the start of this report).

H & R Selection

This part of the audit focused on selection of hollow-bearing (H trees) and recruitment (R trees) trees that must be retained under Condition 5.6 (d) of the Upper North East Region TSL. For the purposes of this audit, the following requirements apply:

- In selecting hollow-bearing trees, priority must be given to those trees which exhibit evidence of occupancy by hollow dependent fauna and trees which contain multiple hollows or hollows of various sizes;
- Hollow-bearing trees must have as many of the following characteristics as possible:
 - Belonging to a cohort of trees with the largest dbhob
 - Good crown development
 - Minimal butt damage
 - Represent the range of hollow-bearing species that occur in the area
 - Located such that they result in retained trees being evenly scattered throughout the net logging area.

- Recruitment trees must have as many of the following characteristics as possible:
 - Belonging to a cohort of trees with the largest dbhob
 - Good crown development
 - Minimal butt damage
 - Represent the range of hollow-bearing species that occur in the area
 - Located such that they result in retained trees being evenly scattered throughout the net logging area;
- Recruitment trees should not have developed hollows. The TSL defines a
 Recruitment tree as "a live tree of a mature or late mature growth stage within the net
 logging area that is not suppressed prior to harvesting and has good potential for
 hollow development and long term survival."

Calculating compliances / non-compliances: protection of retained trees

When assessing trees against the protection criteria, the EPA records a separate finding of compliance / non-compliance for each tree assessed. This is in line with the Condition 5.6(h) of the TSL, which requires each retained tree to be protected.

Why is it important?

The EPA considers it important that hollow-bearing and recruitment are adequately protected from both logging operations and post-logging risks, such as hazard reduction burns and wild fires. Excessive logging debris in the immediate proximity of hollow-bearing or recruitment trees increases the risk of damage to the retained trees – or tree death if the fire is very hot – in the occurrence of a fire. This has a flow on effect on the long-term availability of hollow-bearing and recruitment resources as key forestry structural values.

Protection of Retained Trees

Calculating compliances / non-compliances: protection of retained trees

When assessing trees against the protection criteria, the EPA records a separate finding of compliance / non-compliance for each tree assessed. This is in line with the Condition 5.6(h) of the TSL, which requires each retained tree to be protected.

Why is it important?

The EPA considers it important that hollow-bearing and recruitment are adequately protected from both logging operations and post-logging risks, such as hazard reduction burns and wild fires. Excessive logging debris in the immediate proximity of hollow-bearing or recruitment trees increases the risk of damage to the retained trees – or tree death if the fire is very hot – in the occurrence of a fire. This has a flow on effect on the long-term availability of hollow-bearing and recruitment resources as key forestry structural values.

This part of the audit focuses on protection of hollow-bearing trees (H trees) and recruitment trees (R trees) that have been marked for retention. Condition 5.6(h) of the Upper North East Region Threatened Species Licence (TSL) requires damage to trees to be minimised using directional felling. Further to this:

• Logging debris must not be allowed to accumulate within five metres of a retained hollow-bearing tree, recruitment tree, stag, *Allocasuarina* with more than 30 crushed

cones beneath, eucalypt feed tree, or Yellow-bellied Glider or Squirrel Glider sap feed tree.

- Logging debris within a five metres radius of retained trees must be removed or flattened to a height of less than one metre.
- Disturbance to ground and understorey must be minimised to the greatest extent practicable within this five metres radius.
- Habitat and recruitment trees must not be used as bumper trees during harvesting operations.

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			
			Certain	Likely	Less Likely
Level Environmental	of	High	Code Red	Code Red	Code Orange
Impact		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.

APPENDIX: DATA TABLES AND FIGURES

Title	Date Created	Northing	Easting
Rainforest	2017-05-10T11:06:28010:00	6469535	384329.5802
Boundary Assessment			
H Tree - Some Debris	2017-05-10T11:32:02010:00	6469607	384303.0022
Marked H	2017-05-10T11:44:36010:00	6469724	384192.2056
R/E Tree	2017-05-10T11:56:21010:00	6469720	384180.6308
Candidate H Unselected	2017-05-10T12:11:16010:00	6469758	384185.5894
Marked H Tree	2017-05-10T12:15:27010:00	6469757	384190.5502
Marked H Tree	2017-05-10T12:17:21010:00	6469768	384205.1011
Marked H Tree	2017-05-10T12:19:15010:00	6469783	384206.0925
Snig Assessment Start	2017-05-10T12:35:22010:00	6469743	384133.0063
Snig Assessment End	2017-05-10T12:40:12010:00	6469513	384209.0838
Crossing CPD	2017-05-10T13:59:37010:00	6467953	382602.5487
Crossing CPE	2017-05-10T14:44:42010:00	6468075	382388.899
Stump	2017-05-10T15:13:34010:00	6469120	383600.2563
Unmarked Crossing	2017-05-10T15:26:20010:00	6469191	383492.7694
Query Harvest In Drainage Feature	2017-05-10T15:42:42010:00	6469263	383653.4937
Stump	2017-05-10T15:45:37010:00	6469256	383649.1948
Stump	2017-05-10T15:46:46010:00	6469253	383645.5571
Stump	2017-05-10T15:49:04010:00	6469238	383650.5963
Pre-harvest Assessment Start	2017-05-11T09:52:00010:00	6467986	382168.2702
Marked R	2017-05-11T09:56:00010:00	6467994	382176.2782
Marked H	2017-05-11T09:58:20010:00	6468005	382188.0545
Marked H	2017-05-11T10:03:32010:00	6468023	382211.9685
Marked H	2017-05-11T10:04:56010:00	6468021	382213.9529
Unmapped Drainage Line.	2017-05-11T10:06:34010:00	6468023	382208.3306
Marked M	2017-05-11T10:11:03010:00	6468042	382207.0067
Marked R	2017-05-11T10:14:52010:00	6468056	382210.3131
Marked R	2017-05-11T10:17:01010:00	6468059	382225.5259
Marked H	2017-05-11T10:20:04010:00	6468057	382249.0069
Unmarked Candidate H	2017-05-11T10:24:09010:00	6468059	382261.9047
Marked R And	2017-05-11T10:30:10010:00	6468084	382259.2576
Boundary Marked H And Boundary	2017-05-11T10:33:19010:00	6468090	382244.0443
Unmarked Candidate H	2017-05-11T10:34:58010:00	6468098	382233.1302
Marked H	2017-05-11T10:40:07010:00	6468084	382221.8866
Marked H And Boundary	2017-05-11T10:43:51010:00	6468109	382225.8539
Marked H And K	2017-05-11T10:47:39010:00	6468133	382211.301
Marked M	2017-05-11T10:50:35010:00	6468149	382204.6858

Marked R	2017-05-11T10:54:21010:00	6468178	382203.0306
Extent Of	2017-05-11T10:57:23010:00	6468186	382206.7381
Boundary And			
Mark up			
Frog Mark Up	2017-05-11T11:17:54010:00	6468079	382732.8284
Boundary	2017-05-11T11:20:44010:00	6467980	382758.0867
Dump 4	2017-05-11111:20:44010:00	6467980	382/58.086/
Heavy Rock	2017-05-11T11:29:13010:00	6468050	382805.1645
Cover			
Marked H Tree	2017-05-11T11:30:44010:00	6468047	382807.3048
Unmarked	2017-05-11T11:36:20010:00	6468042	382835.554
Candidate H			
Marked H	2017-05-11T11:46:40010:00	6468045	382840.69
? Tree	2017-05-11T11:52:12010:00	6468049	382842.9744
Centre Of Frog	2017-05-11T12:25:13010:00	6468005	382536.7332
Habitat			
Located Koala	2017-05-11T12:49:08010:00	6469040	384260.4874
Cut Stump Inside	2017-05-11T13:26:56010:00	6470273	383832.3556
Glider Exclusion			
Cut Stump Inside	2017-05-11T13:28:04010:00	6470280	383831.0323
Glider Exclusion			
Cut Stump	2017-05-11T13:29:48010:00	6470285	383845.5836
Possibly Inside			
Glider Exclusion	2047 05 44742 52 45040 00	6460422	204224 4227
Rainforest	2017-05-11T13:53:15010:00	6469433	384331.1227
Boundary Boundary	2017-05-11T14:04:18010:00	6469478	384346.3331
Assessment- Too	2017-03-11114.04.16010:00	0403476	304340.3331
Thick			
		L	1