Protection of Tree Geebung *Persoonia arborea* in the Central Highlands Forest Management Area: Supplementary Expert Evidence Report for Supreme Court Proceeding S ECI 2020 02246

Expert (Stephen Mueck) retained by Warburton Environment Inc. (ABN 28 781 873 830)

This report has been requested by McMullan Solicitors on behalf of Warburton Environment Inc. and has been created for the sole purpose of obtaining legal advice. Accordingly, this report is subject to legal professional privilege.

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Cover photo:	Typical Wet Forest structure

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Name and address

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Senior Consultant Botanist

Biosis Pty Ltd

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Qualifications and experience

Qualifications and training

- Bachelor of Science (Hons), Monash University
- Masters of Environmental Science, Monash University

Professional affiliations and memberships

- Australian Network for Plant Conservation (current member)
- *Pimelea spinescens* Recovery Team (current member)

Professional experience

I have over 35 years of experience in vegetation assessment, management and research and an extensive knowledge of the vegetation of south eastern Australia. This includes over ten years of experience in senior scientific positions with what is now the Department of Environment, Land, Water and Planning (DELWP). While with the Department, I was coordinator of their Forest Flora Unit for 5 years during which I managed components of the Department's Silvicultural Systems Project. This included monitoring forest environments to assess the impact of timber harvesting practices on the flora of the Central Highlands and East Gippsland.

Since becoming a senior botanist with Biosis Research in 1995, I have been senior scientist and project manager on a number of major investigations including assessments for Melbourne's new Wholesale Market, the Environmental Effects Statement for BHP's Eastern Gas Pipeline, preparation of management options for Mount Stirling and vegetation mapping for the Central Highlands and Western Regional Forest Assessment Areas. Forestry related projects that I have supervised/participated in include:

- Ecological advisor to the Plantations Establishment Advisory Group, which included Australian Paper Plantations, the West Gippsland Catchment Management Authority, local government representatives and the Friends of the Gippsland Bush.
- Certification team ecologist on the SmartWood Scoping Team reporting on Hancock Victorian Plantation's softwood and hardwood operations.
- Project ecologist on the EPA coupe audit team managed by GHD.
- Assessment of the ecological impact of the DELWP and Melbourne Water forest firebreaks establishment program within the Victorian Central Highlands.
- A review of special values protection for Rainforest for DELWP as part of their forest regulation and compliance reform and participation in the reviews relating to threatened species and habitat.

I have completed numerous flora surveys within most ecological vegetation classes in Victoria, undertaken conservation value assessments, worked on nature reserve design and management, prepared ecological design guidelines for developments and supervised and participated in both large and small scale ecological mapping exercises. I also have experience in preparing and implementing pest plant and animal management plans, am DELWP certified for vegetation quality assessments and have produced numerous plans and assessments for clients to achieve compliance with state and federal biodiversity legislation and policy. I have helped develop novel techniques for assessing and mitigating impacts to threatened flora and fauna. I also possess strong project management skills.

Further details about my qualifications and experience can be found in Appendix 1.

Area of expertise to make this report

General expertise

I have worked extensively with remnant native vegetation, including forest environments, in south eastern Australia for more than 35 years, conducting flora and fauna surveys and providing specialist advice on ecological management within these environments.

I have provided advice on the ecological management and rehabilitation of a broad range of environments including grasslands, woodlands, forests and wetlands. This work has included projects involving the provision of advice on mitigating the environmental impacts of proposed developments and the rehabilitation of these environments after impacts associated with construction works, such as road works and the establishment of other infrastructure.

I have provided advice in similar circumstances (i.e. protection and management of sensitive native vegetation retained as part of development) in a number of other instances.

I have authored Victorian Government technical reports investigating the floristic composition of dry, damp and lowland sclerophyll forest in East Gippsland (Mueck 1990a) and the composition of Mountain Ash and Alpine Ash forests in Victoria (Mountain Ash is a Wet Forest species) (Mueck 1990b). I have also contributed to a peer reviewed journal paper entitled "How old are Wet Forest understories?" (Mueck *et al.* 1996). References for these are provided in the section entitled "Documents and materials considered".

A similar experience to this current case involved providing advice to DELWP as part of their forest regulation and compliance review for the protection of rainforest. This included a review of the efficacy of current regulations in the conservation of rainforest and providing suggestions on how to improve the way DELWP manages the risk to this component of biodiversity within Victoria's forest estate.

Species-specific expertise

Tree Geebung *Persoonia arborea* was a species targeted for research by my team of botanists when I was head of the Forest Flora Unit in the then Department of Conservation and Environment (now DELWP). My team collected specimen material for carbon dating and regularly inspected populations of Tree Geebung to evaluate flowering and fruiting cycles as well as other aspects of the ecology of this species, such as seed viability and population dynamics.

Limitations

Information relating to the ecology of Tree Geebung is substantially greater than our understanding of many other rare or threatened species. However, our understanding of this species is far from comprehensive and a precautionary approach is still required when making decisions relating to its management and protection.

Other contributors to this report and their expertise

I, Stephen Mueck, have researched and written this expert evidence report with the assistance of colleagues from Biosis Pty Ltd. While I have the relevant experience to comment on the ecology of this species, I was assisted in the preparation of this evidence by others. I received advice from Michael Goddard (Senior Ecologist with Biosis) regarding the application of the Code of Practice, Management Standards and Procedures and Planning Standards for timber harvesting in Victoria (DEPI 2014a, 2014b and 2014c).

Mapping extracted from relevant data sources was prepared by Sally Mitchell (Senior GIS Operator with Biosis) and Julian Turner (GIS Operator with Biosis).

I have therefore relied on input from current colleagues at Biosis in preparing this expert evidence report.

Scope of this report

I have been requested by Mr John McMullan of McMullan Solicitors, counsel for Warburton Environment Inc., to address six (6) additional questions arising from or as a result of my first statement in relation to the survey for and protection of Tree Geebung *Persoonia arborea* within timber harvesting areas in the State Forests of Victoria's Central Highlands.

In a letter provided to me and dated 24 August 2020 (Attachment 1), McMullan Solicitors posed these questions. Each of these questions is provided in this statement in ***bold italics*** and followed by my response.

Documents and materials considered

The documents and materials that I have considered or otherwise used in preparing this report remain as per my previous statement.

Responses to questions provided

Minimum Harvest Exclusion Zone

1. What is the minimum harvest exclusion buffer required to protect an individual Tree Geebung which is not located within a broader expanse of harvest exclusion zone?

1. Any Tree Geebung within the general area available for harvest within a coup is in an extremely vulnerable position and is unlikely to survive the harvesting and coupe regeneration process. If an individual is identified as mature, it needs to be protected in line with the requirements of the management standards.
2. As indicated in my initial statement, I have recommended that a conservative approach to the management of risk to retained individuals of Tree Geebung within a coupe would be to exclude harvesting from within 50 metres of that individual. This is largely based on the approximate height of the trees being harvested within a Wet Forest coupe in this region and the need to create a protected area capable of withstanding the exposed conditions prevalent in the early stages of post-harvest regeneration.
3. Protection of an area within 50 metres of an isolated Tree Geebung within the harvest area of a coupe would exclude up to about 0.8 hectares of forest from harvesting.
4. Page 6 of Dr Sabine Kasel's evidence documents various research reports relating to the threat of wind-throw with the most relevant being Scott et al. (2015). That research indicated that patch sizes greater than 1.5 hectares, or a circle with a radius of about 70 metres, are relatively resistant to wind-throw. While somewhat less than the protection suggested by that literature, it is my view that a 50 metre buffer provides the minimum protection required to minimise the risk on impact to retained individuals of this species. This is based on the potential for windthrow to impact exposed areas of forest, both to overstorey and understorey species, and minimise the potential for windthrown trees to impact understorey species.

2. Can this buffer be reduced in circumstances where the Tree Geebung is located within a broader expanse of harvest exclusion zone?

5. In some instances, there may theoretically be circumstances where a Tree Geebung is located within a broader expanse of exclusion zone and may not require the minimum 50-metre buffer. However, even if the individual was within a stream protection zone buffered by 40 metres (on each side of the stream), such a linear strip still retains inherent edge effects which would leave an individual mature Tree Geebung vulnerable. Such linear strips can provide areas of retained forest greater than a hectare but their shape is inappropriate to maximise protection.

6. As such the shape of any retained area supporting Tree Geebung is critical in evaluating its buffer requirements. Where an individual Tree Geebung can be contained within the horizontal plane of 50 metre radius circle and be at least 15 metres (horizontally) within the perimeter of that circle, then that individual could be considered protected. However, any part of that retained forest cannot be subject to harvesting within five years of the completion of the regeneration process for the harvested coupe from which the individual Tree Geebung has been protected. This temporal component allows the harvested forest to regenerate to an extent where it offers some level of physical protection before any other harvesting could potentially impact on the protected individual.

7. A prescription needs to be a simple process, universally applied to avoid misunderstanding, discretion and poor decision making. As such, I would recommend any prescription for the protection of Tree Geebung be simple and universal. The simplest, most effective and precautionary outcome is to provide a 50 metre buffer for any individual Tree Geebung to be protected.

3. If the answer to question 2 is Yes:

a. What are the minimum dimensions of such a broader expanse of harvest exclusion zone; and

b. What is the minimum distance between the edge of such harvest exclusion zone and the protected Tree Geebung?

8. As indicated above, there are potential scenarios where a lesser buffer could be applied and a relatively low risk level maintained for potential damage to a mature Tree Geebung. However, this would dependent on topography, the location of the individual, the shape of the retained area of forest and the configuration and timing of current and proposed logging activities in that general area.

9. Relatively complicated decision making processes within a prescription invariably leads to a poor outcome and a failure to protect the environmental values that the prescription was intended to protect. A tree Geebung within a narrow (less than 100 metres wide) strip of retained forest (as provided by a stream buffer for example) is not considered adequately protected because of the significant edge effects associated with narrow linear shapes. While such a buffer may also be contiguous with a more extensive area of retained forest, and therefore be part of a relatively large area of retained forest (i.e. greater than a hectare), the local edge effects remain a threat to any trees within the linear section. Therefore, I would advocate the simple approach of applying one buffer universally for the protection of Tree Geebung. I therefore stand by a recommended minimum buffer of 50 metres.

4. What is the minimum distance that must be maintained in all circumstances between the protected Tree Geebung and the harvest zone?

10. As indicated above, to minimise the risk to any mature Tree Geebung, I would advocate the universal application of a 50 metre buffer.

Identification of coupes to be surveyed for Tree Geebungs

5. In your First Report, you state that Question 2 does not apply, presuming that all coupes in the Central Highlands are both Wet Forest and covered by the habitat importance model. Please:

a. set out the method for determining, for any coupe in the Central Highlands, whether it is Wet Forest, including details as to how online spatial data may be accessed;

b. set out the method for determining, for any coupe in the Central Highlands, whether it is covered by the habitat importance model, including details as to how online spatial data may be accessed.

11. DELWP maintains a spatial database which models the location of all Ecological Vegetation Classes (EVCs) within Victoria. Wet Forest (EVC 30) is one of the EVCs included.

12. VicForests has access to DELWP's spatial datasets and it is a very simple matter to overlay a relevant EVC layer (such as the Native Vegetation - Modelled 2005 Ecological Vegetation Classes layer) with any electronically generated, spatially correct coupe map.

13. Similarly, the habitat importance model for Tree Geebung is available as a spatial file from DELWP. This can readily be incorporated into the spatial layers used by VicForest to generate its coupe maps.

6. In your First Report, you state that the actions you have documented in your response to the first question should apply to all Wet Forest coupes in the Central Highlands. Please state your opinion, and reasons for that opinion, as to whether those actions should apply to Wet Forests coupes not covered by the habitat importance model or only to Wet Forests coupes that are also covered by the habitat importance model.

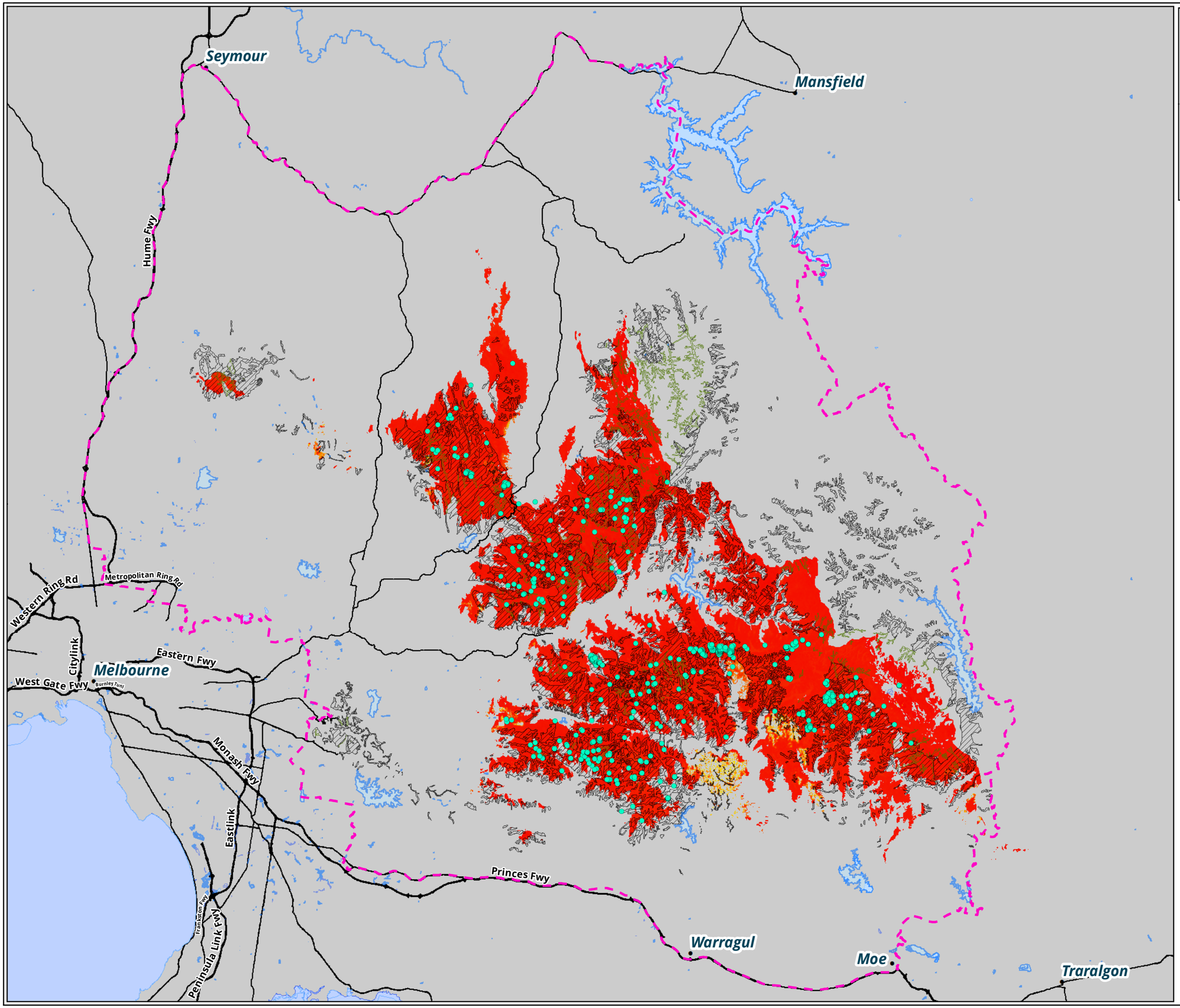
14. The potential presence or absence of any threatened species from a defined area is guided by the Native Vegetation Regulation (2017) Habitat Importance Maps (HIM) for Victorian Rare or Threatened Species (VROTs) (http://services.land.vic.gov.au/catalogue/metadata?anzlicId=ANZVI0803005813&publicId=guest&extractionProviderId=3#tab0). These models identify a scale of importance of that habitat from high to low.

15. The habitat importance model for Tree Geebung is included in Figure 1. This model covers a very high proportion of the known occurrences of this species although some records appear to be just outside the models habitat envelope. However, the accuracy of these records has not been investigated.

16. Adding the occurrence of Wet Forest (EVC 30) and Cool Temperate Rainforest (EVC 31) to this mapping shows a high proportion of overlap with the model, the extent of these communities and the occurrence of Tree Geebung, although the overlap is far from perfect.

17. In that context, a conservative approach to the use of this information to comply with the regulatory requirement to protect mature individuals of Tree Geebung would be to investigate coupes which:

    - support a record of Tree Geebung within 5 kilometres; or
    - are dominated by Wet Forest (EVC 31) or otherwise have remnants of Cool Temperate Rainforest (EVC 31) within 1 kilometre; or
    - are included within or otherwise include a portion of the Habitat Importance Model for Tree Geebung.



Legend

Central Highlands Regional Forest Agreement (RFA) boundary

NVR2017 Habitat Importance Model

***Persoonia arborea* habitat importance**

High

Low

Ecological Vegetation Class (EVC)

30 Wet Forest

31 Cool Temperate Rainforest

Victorian Biodiversity Atlas (VBA) *Persoonia arborea* record

Figure 1 The habitat importance model and VBA records for Tree Geebung within the Central Highlands RFA of Victoria

0 5 10 15 20

Kilometres

N

Scale: 1:500,000 @ A3

Coordinate System: GDA 1994 VICGRID94

biosis

Matter: 33448,
Date: 01 September 2020,
Created for: SGM, Created by: JPT/SKM, Last edited by: smitchell
Location: P:\33400s\33448\Mapping\33448_F1_GeebungDist.mxd

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Limitations and qualifications

Provisional opinions

In relation to management of Tree Geebung during forestry operations, I have not provided any provisional opinions that have not been fully researched as described.

Questions

In relation to these matters, I have no questions that fall outside my area of expertise.

Inaccuracies

To the best of my knowledge, this report is complete and accurate.

Declaration

I have read the expert witness code of conduct and confirm that I understand it and agree to be bound by it.

I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Court.

Stephen Mueck

3 September 2020

Appendices

Appendix 1: Curriculum Vitae for Stephen Mueck

Curriculum vitae

Stephen Mueck

Position

Senior Consultant Botanist

Qualifications

BSc (Hons), MEnvSc

Vegetation Quality Assessments (Habitat Hectares): HH173

Professional experience

Stephen has over 35 years experience in vegetation assessment, management and research and an extensive knowledge of the vegetation of south eastern Australia. Since becoming a senior botanist with Biosis Research in 1995, Stephen has been senior scientist and project manager on a number of major investigations. He has prepared numerous flora surveys, undertaken conservation value assessments, worked on nature reserve design and management, prepared ecological design guidelines for developments and supervised and participated in both large and small scale mapping exercises.

Stephen also has experience in preparing and implementing pest plant and animal management plans, is DELWP certified for vegetation quality assessments and has produced numerous plans and assessments for clients to achieve compliance with state and federal biodiversity legislation and policy.

He has helped develop novel techniques for assessing and mitigating impacts to threatened flora and fauna. He possesses strong project management skills. He has assisted in calculating and identifying the offset requirements for a number of larger Victorian projects including Melbourne's Wholesale Market, Esso's Longford pipeline, the upgrade of the Western Highway (Ararat to Stawell) for VicRoads and MAB's Alliance Business Park at Epping

Key project experience

Project Manager / Botanist	Offset Strategy for the Longford Pipeline. Report for Esso Australia, prepared in consultation with Advisian (four offset sites assessed and registered).
Project Manager / Botanist	Assessment of the ecological values and offset requirements for the Deer Park Bypass including assessment of impacts to private landowners, interactions with Victoria's Valuer General, defining prescribed offsets and sourcing the offsets to ensure project compliance for VicRoads.
Expert witness	Statement prepared and evidence provided in the Supreme Court of Victoria regarding the influence of biodiversity legislation and policy on the purchasing decision making of an informed developer in relation to compensation for the compulsory acquisition of land for the Melbourne Wholesale Market (S CI 2006 08035).

Other project experience

Project Manager / Botanist	Post-construction (2006/2007) audit of strategic firebreaks for Melbourne's water catchments: Flora and terrestrial fauna values. Report for Department of Sustainability and Environment.
Ecologist	EPA (Victoria) forest management audit team assessing the operations of the Department of Sustainability and Environment in state forest according to the Code of Forest Practices with GHD.
Senior Botanist/ Site Manager	Biosis Research managed three grassland reserves (totaling about 60 hectares) for four years (1999-2002). The reserves were established within an industrial subdivision for Cedar Woods Properties and AMP. Tasks included vegetation and rare species monitoring and the planning and coordination of pest plant and animal control works.
Team Leader/Botanist	describing and assessing the vegetation of the Twelve Mile Mineral Sands Project, at Garnpang and Birdwood Stations, Pooncarie, New South Wales, and identifying impact mitigation options for this proposed development of over 160 km2 (2000 for RZM).
Expert Witness Testimony:	provided expert witness statements for numerous clients and appeared before both panels and VCAT to provide evidence. This has involved proposal to develop residential and industrial subdivisions, quarries, mines, roads, powerlines and, power stations. He has also prepared evidence statements for the Department of the Environment, (DoE) for compliance actions under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).
Senior Botanist	description and mapping of the past and present vegetation communities within the South West Regional Forest Area (2.7 million hectares) (1999 for the Department of Natural Resources and Environment, Victoria).
Project Manager / Botanist	Flora and fauna assessment and reporting to inform the approvals process for the industrial subdivision of Ajax Road Altona for Axxcel Management Services.
Project Manager / Botanist	Site assessments, project management and preparation of documentation for the preparation of a Precinct Structure Plans at Lindum Vale for the Metropolitan Planning Authority (PSP 1202).
Project Manager / Botanist	Management of compliance conditions associated with the EPBC Act approval and Planning Permit requirements for an industrial subdivision at Maidstone Street Altona. This included sourcing and registration of offsets, onsite reserve management and the translocation of threatened flora.
Project Manager / Botanist	Site assessments, project management and preparation of documentation for the preparation of a planning permit application and preliminary information documentation under the EPBC Act for the rezoning of land for Shell at Kalkallo.

Other qualifications and training

Construction Induction (OH&S) Red/White Card

Rail Industry Safety Induction Card

First Aid (CPR) training

Publications

Stephen has written over 800 consultant's reports and published 15 other published reports and journal papers:

Mueck S. 2012. Forest Ecology – A Victorian Perspective: Abstract from a paper presented to the FNCV Biodiversity Symposium 2011. **Vic. Nat**. 129(5): 180.

John Turner, Marcia Lambert, David Flinn, **Steve Mueck**, Glen Kile 2005. An analysis of Australian research on indicators of sustainable forest management. Research Paper presented by John Turner at the International Union of Forestry Research Organisations (IUFRO) World Congress, 2005. Session 154: 'Research demonstration: Evaluation of sustainable forest management'.

Mueck S G 2000. Translocation of Plains Rice-flower Pimelea spinescens, Laverton, Victoria. *Ecological Management & Restoration* **1(2)**: 122-127.

Peel W 1999. Rainforest and Cool Temperate Mixed Forests of Victoria. DNRE, Melbourne. (Stephen has made significant contributions to this document i.e. he is the author of all the two-way tables).

Mueck S, Ough K & Banks J C G 1996. How old are Wet Forest understories? *Australian Journal of Ecology* **21(3)**: 345-348.

Loyn R, **Mueck S** & Ough K 1994. Vertebrate Pest Animals and Pest Plants. In: Joint ANZECC-MCFFA National Forest Policy Statement Implementation Sub-committee, The development of consistent nationwide baseline environmental standards for native forests, Draft Report.

Mueck S, Loyn R H, Ough K & Murphy A 1994. Research and development of ecologically sustainable systems of silviculture in Victoria's Mountain Ash forests. International Forest Biodiversity Conference, Canberra.

Turner L A & **Mueck S** 1992. The vegetation of the Sardine, Rich and Ellery Forest Blocks, Orbost Region, Victoria. DCE, VSP Technical Report No.9.

Mueck S & Peacock R J 1992. Impacts of intensive timber harvesting on the forests of East Gippsland, Victoria. DCE, VSP Technical Report No.15.

Mueck S 1990a. The Floristic Composition of Mountain Ash and Alpine Ash Forests in Victoria. Silvicultural Systems Project, Technical Report No. 4, Department of Conservation and Environment, Kew.

Mueck S 1990b. The Floristic Composition of Dry, Damp and Lowland Sclerophyll Forests in East Gippsland. Timber Industry Stratagy, Department of Conservation, Forests and Lands, Kew.

Gillespie G R, Henry S R, **Mueck S**, Scotts D & Westaway J 1990. Flora and Fauna of the Pheasant Creek and Upper Buenba Forest Blocks, Alpine Area, Victoria. Department of Conservation, Forests and Lands, Ecological Survey Report No. 29.

Westaway J, Henry S R, Gillespie G R, Lobert B O, Scotts D & **Mueck S** 1990. Flora and Fauna of the West Errinundra and Delegate Forest Blocks, East Gippsland, Victoria. Department of Conservation, Forests and Lands, Ecological Survey Report No. 31.

Westaway J, Cherry K, Duncan P E, Gillespie G R, Henry S R, & **Mueck S G** 1990. Flora and Fauna of the Lower Wilkinson and Fainting Range Forest Blocks, Gippsland, Victoria. Department of Conservation, Forests and Lands, Ecological Survey Report No. 27.

Gell P A & **Mueck S G** 1987. Applications of Isolate Biogeographic Theory to the Delineation and Management of Mallee Nature Reserves. Proceedings of 21st Congress, Institute of Australian Geographers, University of Western Australia. May 1986.

Professional affiliations and memberships

Australian Network for Plant Conservation (Current member)

Native Fish Australia (Member 1990 –1995)

Pimelea spinescens Recovery Team (Current member)

Attachment 1: Letter dated 24 August 2020 from McMullan Solicitors

WARB001VIC
2020-08-24

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24 August 2020

Mr Steven Mueck
Senior Consultant
Biosis
38 Bertie Street
Port Melbourne Vic 3207

Your Ref:

By Facsimile:
No pages: 1
By email: smueck@biosis.com.au

Dear Sir

Engagement as Expert
Supreme Court No S ECI 2020 02246
Plaintiff: Warburton Environment Inc (ABN 28 781 873 830)
Defendant: VicForests
Request for Supplementary Report

1. Thank you for providing your expert report dated 3 August 202 (**First Report**), which we have filed in support of our case in the above proceeding.
2. We seek a supplementary report from you, clarifying your opinions in relation to certain matters covered by the First Report.

Your duty as an expert

3. We understand you have already read the *Expert Witness Code of Conduct*
4. Please ensure, again, that your report conforms with the *Expert Witness Code of Conduct*, and contains each of the requirements set out in section 3 of the *Expert Witness Code of Conduct*. In particular, please ensure that your report includes the acknowledgement set out at paragraph 3(b) and the declaration set out at paragraph 3(i) of the Code
5. Please note, in addition, that Order 44.03(4) of the *Supreme Court (General Civil Procedure) Rules 2015* requires that you sign the report.

Questions

A. Minimum Harvest Exclusion Zone

In the First Report , you state that:

> *... the inclusion of Tree Geebung within a broader expanse of harvest exclusion zone that is at least 100 metres wide and where the individuals are at least 15 metres from the exclusion zone edge provides a theoretically robust protection area*

You also state that:

> *To conservatively manage the risks noted above, I would recommend a harvest exclusion buffer of at least 50 metres from any individual Tree Geebung.*

Can you please provide your opinion, and the reasoning upon which that opinion is based, in relation to the following questions:

1. What is the minimum harvest exclusion buffer required to protect an individual Tree Geebung which is not located within a broader expanse of harvest exclusion zone?

2. Can this buffer be reduced in circumstances where the Tree Geebung is located within a broader expanse of harvest exclusion zone?

3. If the answer to question 2 is Yes:
    a. What are the minimum dimensions of such a broader expanse of harvest exclusion zone; and
    b. What is the minimum distance between the edge of such harvest exclusion zone and the protected Tree Geebung?

4. What is the minimum distance that must be maintained in all circumstances between the protected Tree Geebung and the harvest zone?

Identification of coupes to be surveyed for Tree Geebungs

5. In your First Report, you state that Question 2 does not apply, presuming that all coupes in the Central Highlands are both Wet Forest and covered by the habitat importance model. Please:
    a. set out the method for determining, for any coupe in the Central Highlands, whether it is Wet Forest, including details as to how online spatial data may be accessed;
    b. set out the method for determining, for any coupe in the Central Highlands, whether it is covered by the habitat importance model, including details as to how online spatial data may be accessed.

6. In your First Report, you state that the actions you have documented in your response to the first question should apply to all Wet Forest coupes in the Central Highlands. Please state your opinion, and reasons for that opinion, as to whether those actions should apply to Wet Forests coupes not covered by the habitat importance model or only to Wet Forests coupes that are also covered by the habitat importance model.

Yours faithfully
JOHN MCMULLAN