SUMMARY

The Wombat Forest Society and Central Victorian Forestry Company Pty Ltd present a joint submission highlighting the need for adequate programmes and funding for the Department of Natural Resources and Environment to ensure delivery of the principles contained in the FOREST MANAGEMENT PLAN and the requirements identified in the REVIEW OF SUSTAINABLE SAWLOG YIELD for the MIDLAND FOREST MANAGEMENT AREA.

The submission identifies the key issue which is to concentrate on growth of the third generation forest and give it the attention it deserves while delivering other forest values which both parties believe are equally important.

The desire of both parties is to ensure the community is fully cognisant of the approach which is being taken to management of the forest. We acknowledge DNRE is already working to address some of the issues raised in this submission.

TO: Hon. Marie Tehan, MLA,
Minister for Conservation and Land Management.
8 Nicholson Street,
East Melbourne, 3002.

FROM: Wombat Forest Society.
Central Victorian Forestry Company.
Sawmillers of Midlands Forest Management Area.

15/09/98

RE: Long Term Sawlog Sustainability of the Wombat Forest.

The purpose of this letter is to present the joint concerns of Central Victorian Forestry Company and the Wombat Forest Society that the Government provides adequate commitment and resources to certain management issues, and to the maintenance of forest growth for the long term sustainability of all forest values including the hardwood timber industry in the Midlands Forest Management Area.

The organisations are also concerned that the present level of DNRE funding is impinging on the ability of the Department to manage the forest according to criteria laid down in the Forest Management Plan for Midlands Forest Management Area, the Review of Sustainable Sawlog Yield Midlands Forest Management Area and the Timber Industry Strategy, the latter of which provides the overall framework for management of all forest values and uses, timber and non-timber.

This joint submission is a unique event for both the conservation movement and the timber industry in this area. It is based on a joint perception that the need for further research and silvicultural works in the Midland FMA to produce the projected sustainable yield outcomes, and the proper management of all non-timber values, is paramount and transcends any fundamental ideological differences between the two organisations.

The Sawmillers of the Midlands Forest Management Area, the Central Victorian Forestry Company and the Wombat Forest Society acknowledge that they have participated in the Department of Natural Resources and Environment's planning processes and agree that the recommendations contained in the above reports contain fundamentally sound management systems. Each party is committed to ensuring 'worlds best practice' for the Wombat Forest and efficient use of the land base for multiple use forestry

The forward of the Midlands FMA Forest Management Plan states that.. "*the plan provides for the balanced use and care of State Forest*".. and is "*an example of integrated regional planning drawing on a wide range of expertise both within and outside the Department.*" It provides a framework in which the region's timber industry can continue to invest as well as providing a framework for the protection of natural values of the forest. Special measures are identified to add further security to the quality and yield of water used for urban supply, and a clear basis for State Forest recreation and tourism is established.

The Sustainable Sawlog yield review summary states that the review "... provides for the probable impact of wildfire" .. "and is based primarily upon Implementation of a young regrowth management program... Continuation of Shelterwood silviculture on high to medium productivity sites..Re-treatment of understocked areas... Protection of regional biodiversity, ...domestic water supply catchments and Powerful Owl habitat."

TIMBER RESOURCE AND SUSTAINABLE YIELD

+ Based on its analysis of the yield expectation graphs contained in the review, the Wombat Forest Society is of the view that harvesting and growth forecasts appear to be unsustainable for significant periods unless extensive silvicultural work to promote growth is undertaken. Industry and the Wombat Forest Society are concerned to see that the silvicultural works required to achieve the sustainable yield rate are undertaken so that the sustainable yield can be achieved.

Early thinning is needed to optimise yields and continuing Research and Development is needed to identify the best thinning regimes and to identify the actual rather than estimated growth regimes. It is acknowledged that some work along these lines is being carried out by DNRE but both groups question whether this is sufficient to meet the expectations of the Sustained Yield Plan.

+ The sustainable yield model was essentially produced from running several FORPLAN simulations based on GIS, logging history, utilisation standards, Continuous Forest Inventory Plots, growth models and forest interpretation of aerial photographs. DNRE needs to provide further elaboration of its Sustainable Yield methodology, including many of the assumptions such as rotation length and growth rates.

Dr Brian Turner of the Department of Forestry, ANU, evaluated the methodology used in the review. Both parties recognise that DNRE is currently carrying out an appraisal in a number of the above areas, and are hopeful this will help clarify issues and satisfy concern at the local level. DNRE also need to explain to the public how other forest values other than timber were accommodated in the model.

+ Industry and the Society supports ongoing reviews of the yields and volume estimates to ensure the data base is continually upgraded. Funding must be made available to the Department to continue to upgrade the resource data. Further more a summary of yields of shelterwood 1 and 2 cuts over the past 10 years should be made available by DNRE as part of the review.

+ The Forest Act specifies a commitment of government to supply the timber industry with 58,000m3 of sawlog per annum. A critical time

arises in the model at age 40 when the current regrowth is required to supply sawlog. Every silvicultural effort must be made to grow the regrowth at the required sustainable rate or greater to avoid this potential problem. This means that funding must be available to the Department to grow the wood.

+ DNRE should clarify the levels of operational funding needed for silvicultural works, to ensure that yields from regrowth are optimal, and that the timber will come on stream when sawlog supply from existing mature forests is predicted to decline.

+ The Shelterwood System was introduced into the Midlands in the mid seventies. The Wombat Forest Society believe that around seventy per cent of the Wombat Forest has had at least the first Shelterwood cut. Industry suggests that a review of the logging history since the introduction of shelterwood would give a better insight into the level of cut under this silvicultural system in future.

REGENERATION

+ The regeneration response has not been consistent. Funding must be made available to DNRE to bring unstocked areas into full production. Further applied research into early growth enhancement is required, along with research into the impact of retained trees on regeneration and growth response. This work must be conducted with due regard to the catchment values. The results of this research must then be put into practice.

+ The Wombat Forest Society is of the view that the rotation period in the Model appears to be seventy years in the shelterwood areas. The Wombat Forest Society claim that with the important catchment values and future tourist and recreational values, this rotation is contrary to the Code of Forest Practice. Industry does not agree with this claim but would seek clarification to alleviate Society concerns.

+ Some regeneration burns over the last ten years have seen many of the prime retained trees under the shelterwood system receive significant scorching. A study by K.Tolhurst from the Creswick School of Forestry has highlighted the measurable retardation of growth rates in these retained trees from this type of regeneration burn. The alternative of cooler burns is that the regeneration strike is compromised. Again further applied research is required to study and quantify the effects of

regeneration burns on the growth rates and quality of retained trees and the regeneration response.

+ The regeneration issue may be defused to some extent if the Department presents a paper explaining the methodology for regeneration needs and how forest growth to meet sustainable yield requirements will be met.

CATCHMENT VALUES

The importance of the Wombat State Forest as the head-waters of a number of Designated Catchments, is broadly recognised. These waterways flow into river systems that have heavy domestic and irrigation demands placed on them.

+ The north flowing rivers from the Wombat Forest, (the Loddon/ Coliban/ Campaspe Rivers) are all heavily allocated for irrigation. The Forest Management Plan recognised the importance of these river systems. Industry believes that the Plan along with the Code of Forest Practices has adequate prescriptions to protect water values. The Wombat Forest Society does not believe these measures are being properly implemented to take into account the importance of these catchments. The Society has criticisms about forest management within these catchments by DNRE, which are beyond the scope of this letter (i.e. to be addressed by CMAs).

LERDERDERG REPORT

The Lerderderg Report looks into the 'Effects of Forest Harvesting on Water Quality in the Lerderderg Catchment.'
The Wombat Forest Society have some misgivings as to the quality and accuracy of this report. Industry does not share these concerns. In order to ensure that current catchment management and harvesting are not degrading catchments further research should be undertaken to further study and assess the impact of logging on water yield and water quality in designated Wombat Forest Catchments.

MINERAL SPRINGS

+ The importance of the Mineral Springs to the region's economy is well recognised.

The Mineral Springs in this area form eighty percent of Australia's Mineral Springs.

+ A Hydrologist working for DNRE has produced a Mineral and Spring Water Resource Protection Discussion Paper (Shugg, 1996, Report No. 6).

Industry and The Society agree that further definitive work needs to be done in this field to define and explore the effect of urbanisation, land clearing and other human impacts on the mineral springs and the recharge areas, and the findings incorporated into forest management where appropriate.

TOURISM AND RECREATION

One of Victoria's booming tourist destinations is the Wombat Forest/ Daylesford Region. A lot of this tourism is centred on the Mineral Springs and the region's natural features and general ambience.

+ In Hepburn Shire last year there were $25 Million dollars worth of proposed tourism developments through the Planning Department alone.

+ Future Tourism and Recreational options are of paramount importance. Tourist Surveys are showing that visitors to the area are increasingly looking for out of town experiences.

+ Historically the Wombat Forest is probably the most intensively logged forest in Victoria, and remains widely used for all forest values.

+ The Timber Industry has a capital investment of $56 million with a further $7 million planned for future expansion. Expenditure into the local economies is $54 million per annum. Wholesale value of production is $58 million pa (Opie, 1996).

There is no reason to suggest that the timber harvesting and tourism cannot co-exist, many opportunities exist for tourism based on the forest and the timber industry it supports.

RECOMMENDATIONS

1. That the Sustained Yield model be tested by producing a set of overlays at an appropriate scale (e.g. 1:25,000) showing the coupes that will theoretically be cut in five year bands, up until the year 2060 (using a different colour per each five year band).
2. That DNRE explain to the community how forest values other than timber were accommodated in the forplan model.
3. That a review of DNRE operating funds for forest management be undertaken to ensure delivery of the Forest Management Plan and

Sustained Yield requirements including - thinning of regrowth and other silvicultural works essential to deliver the plans.

4. That DNRE fund further research and studies to assess the impact of all forest activities on water yield and quality in designated catchments in the Wombat Forest. WFS believe that the best possible research outcomes would be achieved by DNRE adopting a truly co-operative approach with all responsible water and Catchment Management Authorities.

5. That DNRE finance and undertake a study of the mineral springs recharge areas, define the areas and explore the effects of human impact.

6. That DNRE produce a paper of a review of logging history since the introduction of the shelterwood system in the Wombat Forest.

7. That plans for a comprehensive and appropriate early thinning and stand enhancement programme be drawn up for the Midlands FMA.

8. That DNRE present a paper explaining the standards for adequate regeneration.

9. That continuing applied research be approved to study and quantify the effects of regeneration burns on growth rates and timber quality.

10. That continuing applied research be approved and financed to study the impact of overwood (retained trees) on regeneration and growth.

11. That the DNRE prepare a paper containing a summary of yields from S1 and S2 coupes over the past 10 years and how these yields compare with the model predictions.

12. That DNRE demonstrate to the community that pre-logging and post logging management does not compromise flora and fauna values.

SIGNED

John Slorach Central Victorian Forestry Company	Tim Anderson President Wombat Forest Society	Geoff Proctor on behalf of Sawmillers of Midlands FMA

Copies to:
The Premier of Victoria,
Hon. Mr J. Kennett.

The Minister for Agriculture and Resources

and Environment,
Hon. Mr P. McNamara.

Local Members State Government, Victoria.
Hon. Mr R. Knowles.
Hon. Mr T. Reynolds.
Hon. Mr R. DeFegely.
Hon. Mr. B Traynor.
Hon. Mr S. Elder.

Federal Member for Ballarat.
Hon. Mr M. Ronaldson

Other interested State Members:

Hon. Mr P. Gude.

NEWS RELEASE

From the Office of the Minister for Conservation and Land Management

Monday 14 September 1998

MINISTER WELCOMES TALKS ON WOMBAT FOREST

An announcement by the Wombat Forest Society and timber industry representatives that they are working towards a joint position on sustainable forest management in the Wombat State Forest has been welcomed by the Minister for Conservation and Land Management, Marie Tehan.

The society, representatives of the local contractors' association and sawmillers have met on several occasions to sort out a common view on the future of the forest and identify issues over which they require further consultation with the Department of Natural Resources and Environment (DNRE).

"I am very pleased the parties are working together in a cooperative way to address some of the issues," the Minister said.

Mrs Tehan said the DNRE Forests Service would continue to work closely with all parties to ensure that the Wombat Forest was managed and protected and that there was a secure basis for the timber industry and associated employment in the region.

"Strategic plans for the Wombat Forest, setting out conservation and timber harvesting objectives were completed by DNRE in 1997, following extensive public consultation and input," she said.

A Regional Forest Agreement covering the Wombat State Forest and other key forest areas in Western Victoria will be developed during 1999.

Mrs Tehan said the recent series of meetings between the Wombat Forest Society and representatives of the forest industries was an encouraging sign of cooperation leading up to the RFA.

The Wombat State Forest is located 86 km north west of Melbourne, centred on the towns of Daylesford and Trentham. The forest is of major significance for nature conservation, tourism and recreation as well as timber production. The timber industry has a focus on local value added products and employs approximately 380 people.

Media Inquiries:

Marg Hawke, NRE Area Media Liaison (03) 53 336 706
Peter McLaughlin, NRE Media Liaison (03) 9637 8039

Minister for Conservation and Land Management

The Hon. Marie Tehan, MP

Natural Resources and Environment

AGRICULTURE
RESOURCES
CONSERVATION
LAND MANAGEMENT

23 APR 1999

Ref: MC15372
FS/10/0003-1

Mr P. O'Mara
Committee Member
Wombat Forest Society
PO Box 428
DAYLESFORD VIC 3460

Dear Mr O'Mara

I refer to your letter seeking my response to a joint submission with the Central Victorian Forestry Company and the Sawmillers of the Midlands Forest Management Area which raised several issues about forest management in the Wombat State Forest. Your letter was received in my office on 7 April 1999.

Unfortunately, a copy of your submission did not reach my office until 27 January 1999 and only then via the Hon Dick de Fegely, who provided an unsigned copy. I replied to Mr de Fegely on 30 March 1999.

As indicated in my response to Mr de Fegely, I acknowledge that your submission has involved considerable effort to enunciate the issues of concern surrounding the management of the Wombat Forest. A response to some of the key issues raised in your submission is attached. However, most of these issues were raised during the development of the *Midlands Forest Management Plan*, released in 1996, and the *Review of Sawlog Sustainable Yield – Midlands Forest Management Area*. These reports establish a fundamentally sound strategic basis for the management of the forest.

The Western Victorian Regional Forest Agreement (RFA), now underway, will provide a further opportunity to consider the issues you have raised, recognising that almost three years has elapsed since the previous work on these issues was completed. The community, including your Society, will have the opportunity to contribute to the RFA outcome through the consultation process currently in place. I encourage your Society to continue its involvement in the RFA to ensure that the outcome is based on the best available information.

Yours sincerely

Marie Tehan, MP
Minister for Conservation and Land Management

8 Nicholson Street
PO Box 500
East Melbourne,
Victoria 3002
Telephone: (03) 9637 8989
Facsimile: (03) 9637 8999

ne he had spoken to on air.
Mr Brady said those conversations volved the man arguing aggressely about radio ratings and that we were not number one" or that we did not deserve to say we were".
He told Mr Simon Cooper rosecuting, that the caller and the corded voice had distinctive peech patterns and that after years talk-back radio he was able to cognise voice characteristics.
Mr Mansfield, 55, said that what rticularly concerned him was that e caller pinpointed his address. id when, on 6 April last year, a ller rang the show it "triggered my emory" from the tape recording.
Mr Mansfield said he alerted Mr ady and Mr Ash Long, his agent, pt the caller on line and arranged him to receive a prize so they uld check his address to see if he as the making the threats.
He said the caller's voice reminded m of a man who had been "disrbed" about the show's success id who had "more than just a ssing interest in the program".
An expert speech analyst, Prossor Andrew Butcher, said there as a "very high degree of simility" between a recording of Mr ilkins' voice from the radio call and e answering machine threat but it as not possible to say they were the me.
Mr Wilkins told police he found *ghtline* "a bit nauseating" and that "might have called them ckheads" but denied making reats.
The charges against Mr Wilkins, of nerald Street, South Melbourne, clude using a phone service to enace and four counts of threatening to kill.
The case in continuing.



ccused: Joseph Wilkins, 70.

The girl, Lorna Cubillo, now 61, said one of the men gave her some salted meat. "He held my hand and took me to the water's edge. I was covered in soot and ashes. He washed the lower part of my leg and told the other person that I was a half-caste . . . He picked me up and handed me to the other person . . . My grandmother objected and cried and we rode away."

families as children and forced to live in institutions.

She told the court the horsemen delivered her to a black car waiting outside the gates of Banka Banka cattle station. She was later moved to a fenced compound at Phillip Creek, where other Aborigines had gathered. Mrs Cubillo's grandmother followed but was not allowed in.

She and other mixed-race girls

broke out between the woman and her Aunt Rose was breastfeeding an infant aunt gave her the baby and herself to the ground.

Mrs Cubillo wept as she re . "a lot of people crying . . . P were hitting themselves hunting sticks and blood pouring down their faces. O truck we were crying."

During the 48-hour journ

Row flares over logging audit

(Age Aug 12. 1999)

A state minister warns her federal counterpart to stay out of Victoria.

By CLAIRE MILLER
ENVIRONMENT REPORTER

The State Government has slammed the Federal Forestry and Conservation Minister, Mr Wilson Tuckey, for "interfering" over logging rates in the Wombat State Forest.

The Federal Government has appointed independent auditors to investigate the rates after an analysis indicated timber would be exhausted within 15 years.

The move has infuriated the Conservation Minister, Mrs Marie Tehan, who insists her department's calculations are right and the state does not need "inappropriate interference" from Mr Tuckey.

"Mr Tuckey is barking up the wrong tree," she said. "He should concentrate on problems he has in Western Australia and should follow the formula of due process, which has worked in Victoria for past RFAs (Regional Forests Agreements), to be followed. We do not need inappropriate interference from Mr Tuckey."



Feuding: Marie Tehan is furious with Wilson Tuckey.

But the Victorian Association of Forest Industries welcomed the audit, saying it was in line with a letter from sawmillers and the Wombat Forest Society to Mrs Tehan last year.

The association's executive director, Mr Graeme Gooding, said the industry believed the sustainable yield set by the Department of Natural Resources and Environment should be attainable, "but we are as keen as the (forest) society to ensure the figures are right".

An analysis by the Wombat Forest Society predicted timber in the central Victorian forest would run out within 15 years, putting more than 200 regional jobs at risk.

It said logging rates would need to be halved to restore the balance.

Mr Tuckey said yesterday he agreed to the audit after meeting the society. The audit, which is in addition to routine reviews by the Bureau of Rural Sciences as part of the impending western RFA, will be conducted by two respected forestry academics.

Asked if the audit indicated a lack of confidence in the state's figures, Mr Tuckey said he just wanted to build up as much confidence in the RFA process as possible.

Mr Tuckey also approved an independent audit in Western Australia before its RFA was signed three months ago.

The Wombat audit comes as community tensions mount over the western RFA, which also covers the Otways.

Public consultation periods have been cut short with pressure to complete the agreement by the end of the year to maintain woodchip exports.

Public meetings in Woodend, Trentham and Daylesford over the past month have been packed, with motions passed demanding forests be handed over to community control.

More than 4000 signatures have been collected on petitions.

Much of the Wombat is in the seat of Gisborne, where the Health Minister, Mr Rob Knowles, is attempting to move to the lower house as the anointed deputy premier to replace Alan Stockdale.

Sometimes, credit isn't cool.

As life goes on, we borrow. It's only human.

But sometimes, it can all get out of hand. And then one day, without even knowing how, you're spending more of your life (not to mention money) stressing about debt from credit cards or personal loans than actually enjoying the things you've bought.

But if you call us today, you can wake up without those worries tomorrow.

We'll consolidate all your debts into one manageable account. With one low interest rate. And one convenient monthly payment.

You can apply over the phone in a matter of minutes and get

The Hon Wilson Tuckey MP

Minister for Forestry and Conservation
Minister Assisting the Prime Minister

FAXED 16/8/99

Mr Tim Anderson
President
Wombat Forest Society
PO Box 428
DAYLESFORD VIC 3460

16 AUG 1999

Dear Mr Anderson

Thank you for your letter of 24 June 1999 requesting that Professor Brian Turner be engaged to review the sustainable yield methodology in the Midlands Forest Management Area as part of the West Regional Forest Agreement (RFA). The Hon Michael Ronaldson has also written to me in support of your proposal.

I have passed your paper on sustainable yield issues to the Bureau of Rural Sciences to examine as part of the RFA process. I understand that the Victorian Department of Natural Resources and Environment is also undertaking additional work covering the issues raised by the Society.

The basis of the sustainable yield calculations in the Midlands is described in the first volume of the Comprehensive Regional Assessment (CRA) report for the West Region, published on 6 August 1999. As you are aware, Professor Brian Turner of the Australian National University was involved in reviewing the application of the Integrated Forest Planning Systems (IFPS) in the Midlands in 1995 and his work is referenced in the CRA.

A number of other independent reviews of the sustainable yield systems in Victoria have already been undertaken and reported in previous RFA documentation. These have endorsed and accredited the State-wide Forest Resource Inventory (SFRI) system proposed for the West over the next year or two, as well as the IFPS. Given comments by Ms Duclos at our meeting that the Wombat Society had confidence in the results of the SFRI methodology I am sure you will welcome its application in the Midlands.

As part of the RFA process I propose to ask Professor Ian Ferguson and Professor Turner to prepare a report for the joint Commonwealth State RFA Steering Committee on the matters raised in your paper. I anticipate that this work would be reported in the Directions Report for the West RFA, during October 1999. I agree that this advice is an important step towards ensuring that the outcome has the confidence and support of all stakeholders.

The next review of sustainable yield for the Midlands is due in 2001, in accordance with Victorian legislation, and will take into account the outcome of the RFA and any other relevant information, including the work outlined above. I look forward to your continued involvement in the West RFA over the next few months.

Yours sincerely

Wilson Tuckey

Wilson Tuckey MP

Parliament House Canberra ACT 2600 Telephone: (02) 6277 7270 Facsimile: (02) 6273 7096

Response to recommendations contained in the joint Wombat Forest Society/Ce Victorian Logging Co. submission on the Wombat State Forest.

Recommendation	Response
1. Test the sustainable yield model by indicating where the model predicts timber will be harvested up until 2060.	Some further information has been provided to NRE forestry staff based at Dayle The method proposed does not test the model but would assist in validati Consideration will be given to consulting with stakeholders once this wc complete.
2. Engage Professor Brian Turner of ANU to review the information used to create the sustainable yield model.	Prof. Turner reviewed the original model. Further review is not warranted.
3. Review operating funds available to the Midlands Forest Management Area including the funds required to conduct thinning operations.	Funding to the Midlands FMA is consistent with allocations to State forest in parts of Victoria. A specific annual allocation of $300,000 has been made to regrowth thinning. Regional forestry staff are actively pursuing efficienci thinning programs to maximise the area that can be thinned with these funds. Fu diversion of funds to the Midlands FMA would be at the expense of management programs in other parts of the State.
4. Further research on water yield be conducted in cooperation with Catchment Management Authorities.	There is no evidence that forestry activities are having any adverse impact on quality or yield in the Wombat State Forest. The relevant Catchment Manage Authorities have not indicated any specific concern over the management of p native forest in the context of overall catchment land use. NRE is actively engag catchment research elsewhere in the State and the general findings of this researcl translate to the Wombat State Forest.
5. NRE should fund further research on mineral springs.	NRE has already supported research on mineral springs. This found that almo potential mineral spring aquifer recharge occurs on land lying outside of State fore
6. NRE should produce a paper outlining logging history since the commencement of shelterwood harvesting in the early 1970s.	Early shelterwood logging history records are in poor condition, however, the im of early shelterwood harvesting were incorporated into the timber resource ass:ss completed in the early 1990s. Harvesting following the timber assessment considered in establishing the sustainable yield estimate. Production of the suggested would not be a useful contribution to resolving the issues arising historical practices.
7. Early thinning and stand improvement plans should be developed.	Areas suitable for thinning can be identified in timber resource assessment maps operational planning for thinning is conducted annually. The strategic issues adequately dealt with in the Midlands Forest Management Plan and the sustair yield review.
8. NRE should produce a paper explaining standards for adequate regeneration.	Native Forest Silviculture Guideline No. 10 - *Eucalypt stocking surveys* outline processes and standards used by NRE.
9. Continuing applied research on the effects of regeneration burns on growth rates and timber quality.	The Fire Effects Study conducted by NRE in the Wombat Forest has addressed s of these issues. Work is continuing on development of improved bur prescriptions.
10. Continued applied research on the impact of overwood on regeneration and growth.	There have been extensive studies on this issue allowing adequate conclusions management purposes. Further research is not a high priority.
11. NRE to prepare a paper summarising yields from shelterwood one and two coupes over the past 10 years in comparison with predictions.	Comparisons of this type may be possible in an experimental context but the data by NRE would not permit any valid conclusions from the suggested retrospe analysis. NRE is establishing procedures for monitoring against sustainable forecasts. This will enable tracking of actual versus predicted harvesting over the few years.