

Submission to Victoria's Regional Forest Agreement Review

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Key issues of concern in relation to the RFA Review and RFA Process

1. RFA Reviews, together with the respective Environmental Audits of Commercial Timber Harvesting (referred to as Forest Audits), are consistently 3 years late and amalgamate all RFAs in Victoria into one report. This makes current assessment of the process very difficult in a rapidly changing operational and natural environment, especially as each of the RFAs has completely different environments and issues.
2. Compounding the above, the latest Review 2009-2014 is largely descriptive and does not provide critical evaluation criteria against which it can be quantitatively assessed, without having to constantly refer to the various related documents, including how the results of the Forest Audit are being addressed. The Review document needs a complete overhaul so that it can be readily assessed as a stand-alone document, with each RFA reviewed and audited separately.
3. The Review does not analyse or provide detailed monitoring data for environmental, biodiversity, scenic, landscape and other impacts due to accelerated intensity and scale of logging combined with the impacts of salvage logging following the 2009 wildfires. Moreover, the Forest Audit 2014 highlights issues of non-compliance, particularly in relation to pathogen risk assessment of myrtle rust that is now evident in Myrtle Beech where the canopy has been exposed to sunlight resulting from roads and logging activities.
4. Logging continues to occur in areas known to be critical habitats of threatened species, including breeding sites. Many hollow-bearing trees are left isolated in logged coupes and are susceptible to windfall or are burnt in regeneration fires. Surviving wildlife is subject to predation in these areas. Also, the Forest Audit 2014 highlights a road river crossing creating a barrier to the movement of fish and makes numerous environmental protection recommendations not addressed in the Review or current practices.
5. Recommendations from the previous RFA Review of 2009 in relation to improved threatened species protection through updated prescriptions and monitoring, have not been adopted, with serious implications for biodiversity and other important forest values.
6. The Review does not address the impacts of consistently applying the absolute minimum requirements for buffers for environmental protection, with widespread dieback of *Nothofagus cunninghamii* in rainforest pockets exposed to sunlight and siltation of waterways. Also, the lack of adequate visual offsets from public roads adjoining coupes and scenic escarpments;

7. All areas subject to logging and roading continue to be heavily infested with blackberries and other weeds, despite being identified in the Forest Audit 2014.
8. An extraordinary number of breaches of State legislation, *Code of Practice for Timber Production 2014* and *Management Standards and Procedures 2014* have been recorded and reported by community groups over many years yet are not reflected in the Review, despite the Forest Audit 2014 recommendations specifically relating to many of the issues raised.
9. In relation to social values of forests, the Review does not address impacts on the health and wellbeing of local communities dependent on their surrounding healthy environment. The rapid loss of montane ash forests and their rich biodiversity, scenic and recreational values is creating high stress in local communities that feel powerless to bring about respect for the environment.
10. The Review does not mention consultation with the Taugurong Clans, the traditional owners of most of the Central Highlands FMA or the Victorian Land Council. It is therefore assumed that no detailed field surveys have occurred with Taugurong Indigenous elders whose land is impacted by extensive clear-fell logging and road networks. We do not know what cultural heritage sites are being lost.
11. Despite various research projects in progress, the Review and current logging practices do not incorporate or adapt to new scientific information available for biodiversity conservation, forest management and values, or changes to the timber industry (e.g. radial sawmill using 25 year old plantation grown timber from various Eucalypt species).
12. A key aim of RFAs is to provide long-term security for forest industries, yet an independent, comprehensive, cost benefit analysis, based on well established Ecosystem Accounts processes, has not been included in the Review.
13. Sustainable yields do not reflect forest productivity changes due to climate change or the possible impacts of the 2009 and future wildfires.
14. There are now very few jobs in native forest logging as a result of mechanisation, innovation and industry restructures, yet future job opportunities in tourism, outdoor recreation and other nature-based businesses are being severely and irreversibly compromised. Accordingly, there is an urgent need to transition and retrain those employed in the native forest timber industry to other industries, including plantations and tourism.
15. A major failing and contradiction in the RFA Review and process is the exemption from the Commonwealth's EPBC Act 1999.
16. Most importantly, the Review and RFA process have failed to substantially meet their aims (see below);

Aim 1: Comprehensive, Adequate and Representative Reserve System

The (CAR) reserve system is key to ensuring that the RFA process provides adequate protection for forest ecosystems and threatened species

The Reviews to date show a distinct lack of strategic methodology to determine reserve selection, particularly in the Central Highlands, with the main focus on Special Protection Zones for the Critically Endangered Leadbeater's Possum, based mainly on Citizen Scientists' records. While these SPZs are very important, this approach is not effective for long-term reserve establishment consistent with the CAR system or the "JANIS" criteria.

For example, Rubicon State Forest is currently subject to extremely high intensity and extensive clear-fell logging incorporating the entire northern extent of the Mountain Ash ecological community. This is resulting in a highly fragmented landscape while not leaving adequate, representative areas of the now remnant montane ash forest ecological communities based on effective reserve principles. Maturing eucalypts old enough to form hollows with a dense, diverse understorey and connectivity to other remnants are essential features necessary to maintain biodiversity.

Moreover, logging of forests is now highly mechanized, rapidly denuding large areas, often contiguous coupes, including very steep slopes, thereby leaving absolute minimal protection, if any, for waterways and wildlife corridors. Narrow strips between some coupes are ineffective for protection of biodiversity and healthy water regimes. Essentially, it is industrial scale loss of forests to the detriment of all other values. The extensive road network throughout the forests exacerbates habitat loss and fragmentation, especially when they traverse creeks and rivers with rainforests or remnant patches of forest.

Aim 2: Ecologically sustainable management and use of forests

Clear-fell logging of extensive, often contiguous areas of montane ash forests contravenes all principles of Ecologically Sustainable Forest Management, in particular, maintaining forest diversity and maintaining ecological processes. It disrupts the carbon cycle, water and fire regimes. Importantly also, it results in the complete loss of biodiversity, with removal of understorey, upturning of the soil profile and major erosion on steep slopes (Attachment 1).

Clearly, ecologically sustainable management and logging, in particular, clear-fell logging, are incompatible. In 2015, the IUCN listed the Mountain Ash ecosystem as endangered due to its imminent danger of collapse, with logging as the major threat. Also, loss of mature Eucalypts with hollows for forest dependent species, soil and water impacts (water quality, quantity and flow regimes), altered fire regimes, poor quality control over logging operations, and lack of monitoring of environmental impacts contribute to the unsustainability of forests subject to logging and associated road networks.

Forests provide valuable ecosystem services, including maintaining biodiversity, vital water regimes, are important for carbon storage and mitigating climate change. Montane Ash Forests logged under the Central Highlands RFA, are the most carbon-dense on earth. Logged forests store between 40 and 60% less carbon than undisturbed forests.

The precautionary principle is not being adhered to in native forest management. This is evident from the increasing number of forest-dependent species being assessed as threatened and other species that are currently in rapid decline.

Most assessments are based on desktop surveys, even in areas with limited data. Few field surveys are carried out and these are focused on Victorian listed endangered species like Leadbeater's Possum, rather than biodiversity e.g. small mammals, birds, reptiles, amphibians, invertebrates and understory plants are not considered. Recent data of threatened species in the Victorian Biodiversity Atlas is mostly recorded by Citizen Scientists.

Significant erosion is evident in coupes clear-fell logged during and following wet weather, particularly on the predominant steep slopes. This has long-term impacts on revegetation with loss of topsoil and also high levels of sedimentation of waterways, with resulting detrimental effects on rainforest, riparian and aquatic ecological communities including threatened species.

Importantly, there is a lack of genuine community consultation occurs throughout all stages of the Review and RFA process, as highlighted above in relation to the complexity of the Review document. Also, community input into Timber Release Plans is not reflected in finalised logging plans despite detailed, constructive contributions. Section 16 of the Allocation Order states "consultation must give stakeholders a reasonable opportunity to comment on any plan prepared under Section 37 of the *Sustainable Forest (Timber) Act 2004* or any changes to a TRP". However, the information provided in TRP's is totally inadequate to allow for constructive community input and substantially does not comply with this requirement.

Furthermore, there is no regard for Local Council Plans and VicForests own operational guidelines that include requirements to protect visual impacts of logging on prominent landscapes, especially escarpments viewed from tourist roads. The montane ash forests are increasingly being clear-felled in highly visible, large contiguous areas, then burnt and replanted as plantations, some with little success, but with a prolific understory of blackberries and wattles. Thus, future opportunities for tourism are seriously compromised.

In addition, locked gates on popular tourist roads prevent access to many areas of public forests for bushwalking, sightseeing, fishing, horseriding, cycling, outdoor education and many other activities, thereby stopping people from enjoying the forest environments. Siltation of waterways is affecting riparian and aquatic ecology, biodiversity and fishing alike.

Aim 3: Provide for the long-term stability of forests and forest industries

While the aim is to provide long-term security for forest industries, an independent, comprehensive, cost benefit analysis, based on well established Ecosystem Accounts processes, has not been done. This needs to include the subsidies provided by the Victorian State Government e.g. construction of high quality, gravel, access roads and substantial bridges, and all DELWP staff involved in supporting and monitoring forest activities.

A detailed analysis of *Ecosystem Accounts for the Central Highlands of Victoria* was carried out by researchers from the Australian National University in July 2017 (Keith et al, 2017). This Ecosystem Accounts analysis quantitatively compares select land use activities in addition to trade-offs between different activities. This analysis clearly calculates the respective economic contributions: Agriculture \$312m, Water supply \$310m, Tourism \$260m, Carbon \$49m, Plantation timber \$30m and Native Forest Timber \$12m.

The Victorian Auditor General's report of 2013 *Managing Victoria's Native Forest Timber Resources* highlighted key issues of concern with forest harvesting operations that needed to be rectified but still have not been addressed.

Conclusion

Extending the RFA process would be extremely detrimental for all forest values – environmental, biodiversity, social, economic, tourism, education, historic and cultural heritage, recreational and scenic values, in addition to the serious impacts on water regimes and climate change with implications for future wildfires.



**Attachment
1**

**Erosion in
completed
RIO
coupe
Rubicon
State
Forest**

