

# VicForests' *Harvesting and Regeneration Systems* consultation draft v1.0



## Submission by Rubicon Forest Protection Group Inc.

### Background

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The consultation draft (the *Draft*) outlines several harvesting and regeneration methods intended to serve as partial alternatives to clearfelling. It suggests that these will be better – in ways that are not specified - than current approaches and, alongside more systematic protection of higher quality habitat outlined in its High Conservation Values consultation draft, help it achieve FSC Controlled Wood certification and eventually full FSC certification.

### Key Points

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- The *Draft* contains no targets for transitioning to a new system.
- The *Draft* makes no reference to the protection of understorey species.
- The *Draft* offers no compelling rationale for adopting the proposed new silvicultural approaches
- The wider adoption of alternatives to clearfelling could only possibly constitute an improvement on current regimes if overall harvest levels are commensurately reduced, otherwise forest disturbance and fragmentation will become more widespread.

### Failings

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1. In 2014 VicForests undertook to use regrowth retention harvesting across at least half the ash forests of the Central Highlands, but this did not happen<sup>1</sup>.
2. On 24 April, Vic Forests adopted a new Timber Release Plan that makes no mention of these new systems, but continues to list clearfelling as the harvesting method across almost all ash coupes. None of the new methods are even cited, despite VicForests claiming that:

*Each new area considered to be included on a TRP is subject to desktop and field assessments that aim to highlight potential forest biodiversity, social, historical, cultural, soil and water issues that may require management prior to and during the proposed operation<sup>2</sup>.*

RFPG is aware that VicForests prefer to identify clearfelling as the silvicultural technique since that gives it the greatest flexibility to harvest using 'less intensive' methods, whereas the reverse does not apply. However this makes a mockery of the TRP as a public accountability tool.

3. It is also entirely unclear how much of the gross coupe area is expected to remain where non-clearfelling methods are employed. The *Draft* states that VicForests aims to retain at least 30% of the gross coupe area for clearfelled coupes, but is silent, on how much of the gross coupe area is expected to be retained using the alternative methods outlined.
4. Under these circumstances, how are VicForests' commitments to be judged? In the absence of binding targets, how can we have confidence in VicForests serious, as opposed to tokenistic, adoption of the new systems.
5. But an even bigger issue is that, based on the information VicForests has given in the *Draft*, it is not at all clear that the alternative systems represent any real ecological improvement at all. For example, their wider adoption could only possibly constitute an improvement on current regimes if overall harvest levels are more than commensurately reduced, otherwise forest disturbance and fragmentation will become more widespread. The added disturbance arises from the presumed greater number of

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<sup>1</sup> See Forest Report 2019-0014 lodged with DELWP and copied to VicForests on 25 February 2019

<sup>2</sup> <http://www.vicforests.com.au/planning-1/timber-release-plan-1/timber-release-plan>, accessed 25 April 2019

coupes required for the same volume of wood, the additional roading required and the increased edge effects.

6. In the Rubicon State Forest the proliferation of blackberries is choking the understorey across a considerable portion of the forest in coupes logged in the past 20-30 years, and along much of the entire length of the roads and tracks. This proliferation – at least since 2004 when VicForests came into existence - is largely a result of the lack of concern shown by VicForests for this issue and the lack of control and remediation undertaken. In the absence of effective blackberry control measures, these impacts can only be worsened by the proposed new approaches due to the expanded edge effects.
7. Another edge effect that the *Draft* fails to properly address is the risk of even more damage to retained forest due to escaped regeneration burns. While escapes will presumably be less common where medium and low intensity burns are employed, the increased edges and more complex coupe shapes may make escapes more likely. Major escapes have happened in the Rubicon State Forest in the past several years, due to the inappropriate use of high-intensity regeneration burning.
8. Moreover, while the *Draft* acknowledges the need to reduce high intensity regeneration burning, it makes no commitment as to the extent of any such reduction, or the time frames involved
9. While the new Allocation Order cuts the five-year harvest area limit for ash forests from 14,200ha to 13,700ha, this is offset this by a 500ha increase in access to mixed species forests. Accordingly, the new methods could result in worse impacts on the forest ecosystem generally than clearfelling.
10. Nowhere does the *Draft* acknowledge the adverse effect of ground disturbance due to machinery on the post-harvest floristic biodiversity. The silvicultural system trials at Warra in Tasmania offer some lessons here which the *Draft* fails to mention, much less consider adopting, in particular the significant ecological benefit in areas that were harvested and burnt but from which machinery was excluded. This observation comes from one of the treatments which entailed clear-felling, burning and sowing – as in standard ash silviculture in Victoria – but which entailed ‘undisturbed’ islands being created (40m x 20m) from which the trees were harvested felled and removed by long-reach harvesters operating from the edges of the islands.
11. One of the findings from the first decade of the trials was that regeneration responses in harvested and burnt areas with machinery excluded were significantly better than where the soil had been upended by machinery<sup>3</sup>. The study report cites an honours thesis (Hindrum, 2009) that looked into this effect and found a significant relationship between disturbance type and vegetation response:

*The greatest species diversity of understorey shrubs was found on plots that were lightly to moderately well burnt and that had not been mechanically disturbed during the harvesting. Species diversity was lowest on unburnt, disturbed and compacted seedbed typical of primary snig tracks and firebreaks, which points to the need to keep these areas to a minimum. Eucalypts and fireweeds (Senecio spp.) were characteristic of well burnt seedbed and cutting grass was characteristic of unburnt and compacted seedbeds.*

12. However since the Warra trials were conducted in *Eucalyptus obliqua* (messmate) forests the lessons for ash forest silviculture in Victoria are uncertain, especially given that quite different responses occurred in those forests designated as having a ‘wet sclerophyll’ understorey compared with those having a ‘rainforest’ understorey:

*For example, Eucalyptus obliqua forest with a wet sclerophyll understorey responds to harvesting and burning disturbance differently from Eucalyptus obliqua forest with a rainforest understorey. The floristic composition of the former, at age 6–10 years, is close to its floristic composition before disturbance. Such is not the case at rainforest sites where, after harvesting and burning, the*

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<sup>3</sup> Neyland, M and Jarman, S. Early impacts of harvesting and burning disturbances on vegetation communities in the Warra silvicultural systems trial, Tasmania, Australia. *Australian Journal of Botany*, 2011, **59**, 701–712

*regenerating flora is wet sclerophyll in nature and the species composition has little in common with the pre-harvest rainforest flora<sup>4</sup>.*

13. The *Draft* offers no compelling rationale for adopting the proposed new silvicultural approaches. This is especially the case for the Central Highlands where the habitat tree and old-growth protections that the new systems are intended to support should be protected in any event if the Code of Practice for Timber harvesting was properly complied with at all times.
14. Given the issues noted above, the adoption of these new systems should have no bearing on VicForests' efforts to seek FSC Controlled Wood certification, since they do not effectively remediate the HCV non-conformance that the SCS auditors identified.

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<sup>4</sup> Ibid.