DRAFT FOR DISCUSSION

Unsustainable!

Submission by Rubicon Forest Conservation Group to VicForests seeking to halt unsustainable timber harvesting in the remaining ash forests of the Alexandra district

Disclaimer

Every effort has been made to confirm all the facts and figures presented in this report, however without access to unpublished Government and VicForests data, memoranda and reports some errors may have occurred. Any such errors are to be regretted, however it is not considered that they will materially affect the overall conclusions and recommendations of this report.

Executive Summary

Logging in the ash forests of the Central Forest Management Area (FMA) currently exceeds any reasonable measure of sustainable timber yield, and is completely unsustainable taking into account all other forest values.

In 2010 the Government changed the allocation process, lifting the statewide allocation of ash forest to be harvested and freeing VicForests from the constraint of FMA-specific allocations. And in 2014 the Government freed VicForests from the need to seek departmental approval for its Timber Release Plans (TRPs).

As a result, in 2015 the Central FMA accounted for more than half all ash forest logging in Victoria despite around 10,000 ha of its ash forests being killed in 2009. Yet it contains barely one fifth of the area of ash forest that is available for harvesting across the State.

The rate of logging was lifted after the Black Saturday fires initially as salvage logging but soon moving back into the area's unburnt forests. This increase helped shore up the Murrindindi economy in the wake the fires but it should now be wound down immediately. A sustainable harvesting rate for the Central FMA is now estimated to be no more than 300 ha per annum, but an ecologically sustainable level taking into account all forest values would require cessation for several decades.

Focussing on the Royston Range, the submission shows that key biodiversity, tourism and conservation values associated with the last intact vestiges of the area's unburnt 1939 regrowth ash forests are gravely threatened. Unless the harvesting rate is drastically cut there will be no largely intact areas of tall mature ash forests in this area for many decades and other forest values and economic opportunities will be lost.

RFCG calls upon VicForests to enter into an open dialogue with knowledgeable experts, local businesses, concerned citizens and affected timber workers from the Murrindindi area to determine how a more sustainable rate of logging might be implemented. Meanwhile, we call upon VicForests to suspend logging in all areas in the northern half of the Alexandra Forest District, and to limit logging elsewhere to coupes specified in the April 2015 TRP.

Introduction

The Rubicon Forest Conservation Group (RFCG) was formed by a number of local community members concerned about the intensity of timber harvesting in the area and the impact it has had, and continues to have, on the non-timber values of this area of forest.

The Rubicon area is part of the Central FMA, which comprises the forests north of the Great Divide up to the Goulburn River from Mt Disappointment in the east to Mt Torbreck and Mt Matlock in the west and comprises the Marysville, Toolangi and Alexandra forest districts.

The increase in harvesting since 2010 despite the loss of around 10,000 ha of ash forest in the 2009 fires at least half was of harvestable age[1] is of deep concern. VicForests' claim at the time that the fires would still allow existing harvest levels to be maintained in the medium-term[2] essentially foreshadowed an intensification of logging in the remaining unburnt areas. Yet when even greater ash forest areas were lost in the 2006-07 fires across other FMAs, the area allocated for harvesting from undamaged forests was slashed[3].

The RFCG acknowledges that the native forest timber industry has been a vital part of the local economy for well over a century, provides jobs for many, is essential for processing industries, particularly in Gippsland, and is a significant part of the wider Victorian economy. We also recognise that the good forest roads that timber trucks require and experienced contractors with their machines working in the bush can play a critical role in suppressing fires when they do occur.

However on the current path, not only will all the maturing ash forests of the Central FMA be gone for many decades to come but so will many of the other values that these forests provide. In looking at the range of these other values, this submission focusses mainly on the forests of the Rubicon area within the Alexandra Forest District, but we are aware that similar issues arise in other parts of the Central FMA, including Toolangi and Marysville.

The report is focussed on ash forests as these are the most profitable for VicForests and most heavily in demand by industry and so are under the greatest harvesting pressure.

The report has three chapters. The first outlines why we consider current ash forest harvesting levels are unsustainable not only in the Central FMA, but also statewide. The second describes some of the forest values being compromised and the third outlines some immediate steps that VicForests and the Government need to take to correct this wholly unsustainable trajectory and fix some of the immediate problems.

[1] In 2009–10, according to its 2010 Annual Report (p.8), the 2009 fires killed about 13,000 hectares of high-quality ash forest of which about 7000 hectares were stands of a harvestable age. Of those stands, VicForests has salvaged about 1600 hectares. Based on the proportion of ash coupes in the 2015 TRP designated as 'clearfelling – salvage' around two thirds of the fire-killed stands were in the Central FMA.
[2] Ibid.
[3] Comparison of ash forest areas specified by FMA in the 2004 and 2007 Allocation Orders.

Chapter 1: The unsustainability of current harvesting levels

On its creation in 2004, VicForests was allocated timber resources by forest type and FMA. Various forest types across 7 different FMAs were designated with a maximum harvest area allowed over a five year period specified for each type and in each area. This is shown in the extract below from the original 2004 Allocation Order for the period 2004-2009.

Table 1 – Timber Resource Allocation Period 1		Extent and Location of forest stands to which VicForests has access						
Forest stands	*Total available area of forest stands at 1-8-2004	Benalla-Mansfield	North East	Central	Dandenong	Central Gippsland	Tambo	East Gippsland
High elevation ash, pre-1920	200	120						
High elevation ash, 1920s	760	130						
High elevation ash, 1930s	980	100						
Low elevation ash, pre-1920	190	10						
Low elevation ash, 1920s	350	40						
Low elevation ash, 1930s	660	50						
High elevation mixed species, pre-1920	6,740	270						
Low elevation mixed species, pre-1920	10,520	210						
Ash, pre-1920	6,090		1,010					
Ash, post-1920	4,100		360					
Ash Mixture	6,810		80					
High Quality Mixed species	13,510		160					
Low Quality Mixed species	1,260		180					
Alpine Ash - Mature	690					40		
Alpine Ash - 1920s	140					10		
Alpine Ash - 1930s	15,710			950		300		
Alpine Ash - 1940s	210					10		
Alpine Ash - 1950s	1,590					80		
Alpine Ash - 1960s	1,670					80		
Mountain Ash - Mature	320					50		
Mountain Ash - 1930s Low	170				20			
Mountain Ash/Shining Gum - 1930s	28,040			1,380	900	1,710		
Mountain Ash/Shining Gum - 1940s	960					200		
Mountain Ash/Shining Gum - 1950s	100					10		
Mountain Ash/Shining Gum - 1960s	60					10		
Mixed Species - Mature	14,390			400		2,580		
Mixed Species - 1930s	18,670			350	180	730		
Mixed Species - 1940s	640					80		
Mixed Species - 1950s	30					10		
Mixed Species - 1970s	5,810					130		
Low quality Mixed species - Mature	3,760			200				
Low quality mixed species - 1930s	8,910			190				
Alpine Ash - Unevenaged	470						300	20
Alpine Ash - Mature/over-mature	6,420						1,330	100
Alpine Ash - 1930s	2,390						110	10
Mountain Ash - Unevenaged	60						50	
Mountain Ash - Mature	570						70	
Mountain Ash - 1930s	540						60	
Ash - Unevenaged	30							10
Ash - Mature	640							90
Alpine mixed species - Unevenaged	1,560						20	40
Alpine mixed species - Mature	10,120						90	270
Coastal mixed species - Unevenaged	3,170						50	250
Coastal mixed species - Mature	7,060						110	430
Mountain mixed species - Unevenaged	3,760						120	440
Mountain mixed species - Mature	16,570						370	1,390
Foothill mixed species - Unevenaged	32,220						120	4,020
Foothill mixed species - Mature	85,370						1,160	4,730

*The total available area for each forest stand is extended to include any coupe identified on an existing Wood Utilisation Plan approved (category 1, 2, 2a or 2b) by the Secretary before the commencement of this Order.

In 2010, to give VicForests greater flexibility in scheduling timber supplies, and possibly concerned about its profitability and ability to meet its timber supply contracts, the allocation rules were changed. Rather than being assigned by FMA, harvestable timber areas were now allocated on a statewide basis and instead of being partitioned according to a range of stand types only two types were specified: 'ash' and 'mixed species'. And whereas the 2007 fires led to a big reduction in the statewide ash forest area allocated for harvesting, the total ash forest area allocated to harvesting in 2010 was increased (see below) despite 13,000 of ash forest being killed in the 2009 fires, of which 7,000 ha were harvestable stands[4].

	Statewide (ha)	Central FMA (ha)
Ash forest area within *State Forest*	286,000	64,000
Ash forest area available for harvesting excluding special protection zones and conservation reserves	241,000	48,000
Ash forest area available for harvesting excluding special protection zones, conservation reserves, riparian buffers and slopes > 30°	159,000	36,000
Ash forest area available for harvesting (excl. thinning) in harvestable stands, excl. special protection zones, conservation reserves, riparian buffers and slopes > 30°	**80,440**	**n.a.**
Average annual harvest limit for ash forests (gross area) for current period:		
in 2004 Allocation Order	2,980	772
in 2007 Allocation Order	2,500	820
in 2010 Allocation Order	2,880	n.a.
in 2014 Allocation Order	2,840	n.a.
Annual gross harvest area, 2010-11 to 2013-14	2,680	n.p.
***Estimated* gross harvest area in 2015**	2,558	1,420
***Estimated* gross harvest area 2013-2016**	2,840	1,250

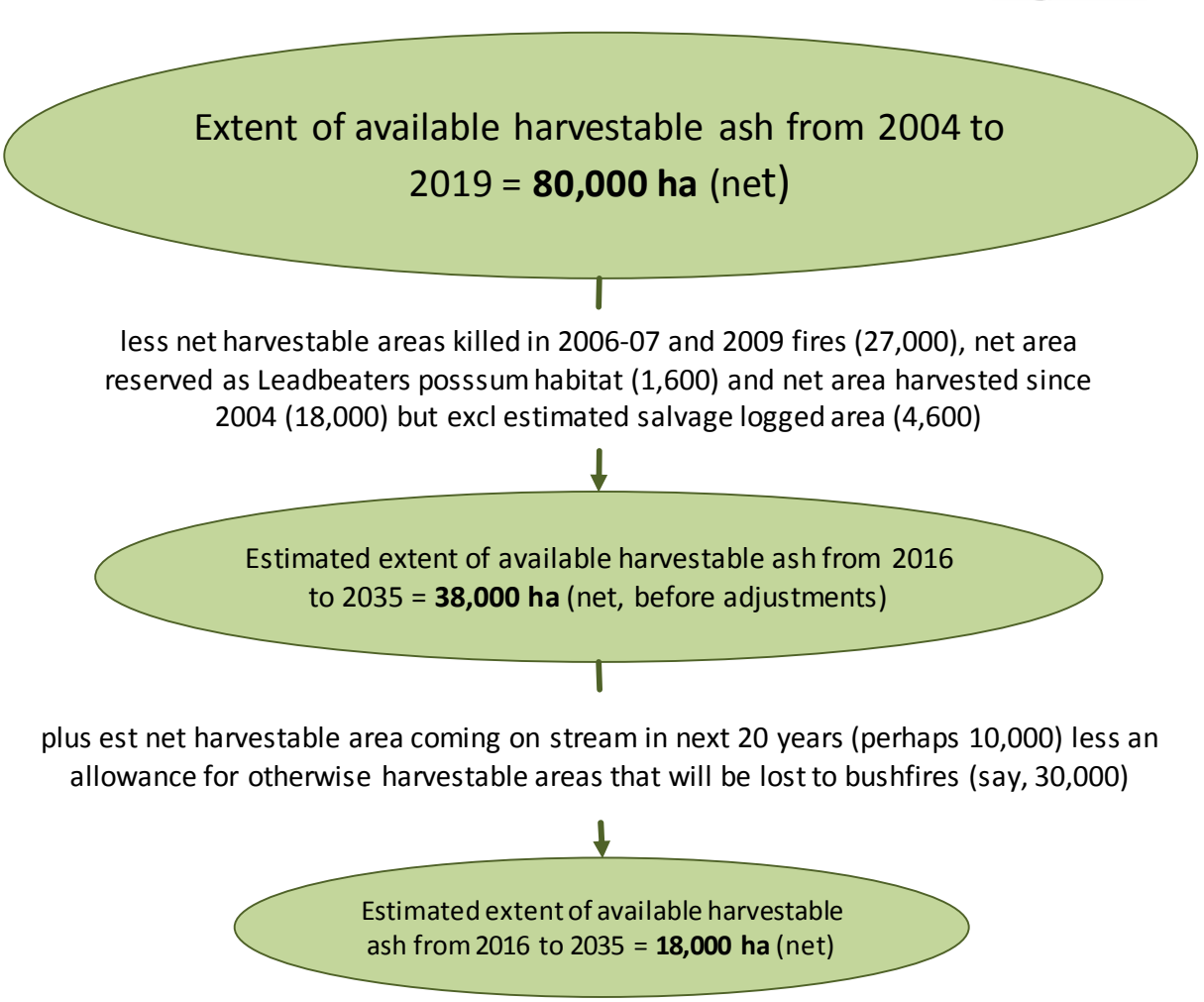
These changes allowed much larger areas of forest from any given FMA to be harvested in a given period than previously. For the Central FMA the change has been pronounced. Under current arrangements Central FMA is set to account for almost twice the harvest area that was allowed when VicForests was established in 2004.

[4] VicForests 2010 Annual Report, p.8

Statewide sustainability

Whether or not these harvesting rates are sustainable for the Central FMA is discussed below, but first it is necessary to consider sustainability from a statewide perspective.

To understand this we analyse the changes in net available harvestable area since 2004, and those likely to happen from now on. Figures that might allow this to be readily understood are not published by VicForests but broad estimates can be made based on figures that are published.



Sources and assumptions
See Appendix B

VicForests has forecast an average net harvesting rate for ash forests of 1,300 ha p.a.[5], in which case the harvestable ash resource could be gone in 15 years. But as the available harvestable resource shrinks the remaining stands will become less financially viable. If so, the ash-based timber industry in Victoria could close down long before large areas of previously burnt or harvested ash forests become available from the mid 2040s[6].

[5] VicForests, 2015 *Ecologically Sustainable Forest Management Plan* p.44
[6] VicForests, *2014 Resource Outlook*

VicForests has defended its modelling arguing that the Victorian Auditor-General found that it is "harvesting within sustainable levels and its approach is both accurate and reliable"[7] but the various qualifications regarding sustainable harvest levels expressed by the Auditor-General[8] are not referred to. These are highlighted in Appendix C.

It seems likely that VicForests expects to maintain its forecast harvesting level by

a) gambling on no really large landscape-level fires such as in 2003, 2006-07 and 2009 and
b) trusting that no further areas will be reserved from harvesting or otherwise made unavailable and, failing these,
c) cutting average rotation lengths from around 85 years to perhaps as low as 60 years.

None of these assumptions stack up. With global warming accelerating, landscape level fires will become more frequent. Recent fires in Tasmania's World Heritage killed areas of forest that had remained unburnt for 1,000 years. These have been attributed to increased frequency of lightning associated with climate change[9].

The assumption that no (or minimal) further areas will be reserved from harvesting or otherwise made unavailable is at odds with VicForests' own moves to increase safeguards for threatened species. For example, it has adopted a more conservative silvicultural approach in many mountain ash coupes in the Central Highlands to increase potential habitat for leadbeaters possum[10] as well as recently reserving 1,600 ha of forest for its protection[11].

And ignoring issues of biodiversity loss, cutting rotation lengths could well make harvesting uneconomic due to the lowered sawlog yield that would entail. So the figure of 1,300 ha p.a. (net) for ongoing ash forest harvesting statewide would seem to be far from assured.

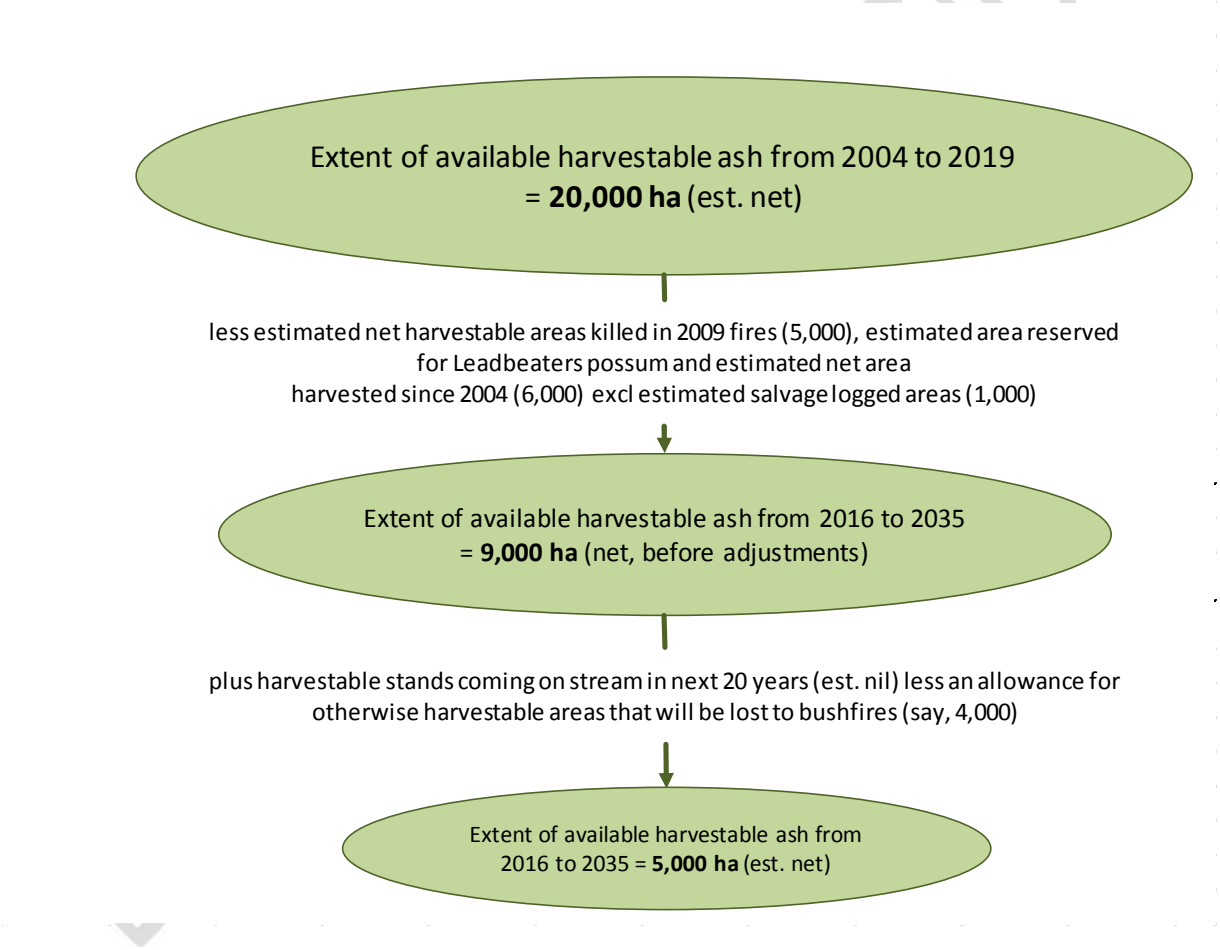
[7] Ibid.
[8] Victorian Auditor-General, 2013 *Managing Victoria's Native Forest Timber Resources*
[9] The Guardian, 27 Jan 2016, *World heritage forests burn as global tragedy unfolds in Tasmania*.
[10] See VicForests web page on regrowth retention harvesting. http://www.vicforests.com.au/leadbeaters-possum1/regrowth-retention-harvesting-1
[11] VicForests 2015 Sustainability Report, table 1

Central FMA sustainability

The following diagram illustrates the estimated impact of the 2009 fires and the intensified logging in the Central FMA since 2010 on future availability. It shows that the extent of available ash forests has more than halved over the past 12 years and now stands at around 7,000 ha.

At current estimated harvesting rates (around 600-700 ha p.a. net) and allowing for further future losses to bushfires, all the remaining area of maturing 1939 regrowth ash forests of the Central FMA outside buffer areas and reserves (est 5,000 ha net) will have been harvested in 7 years.

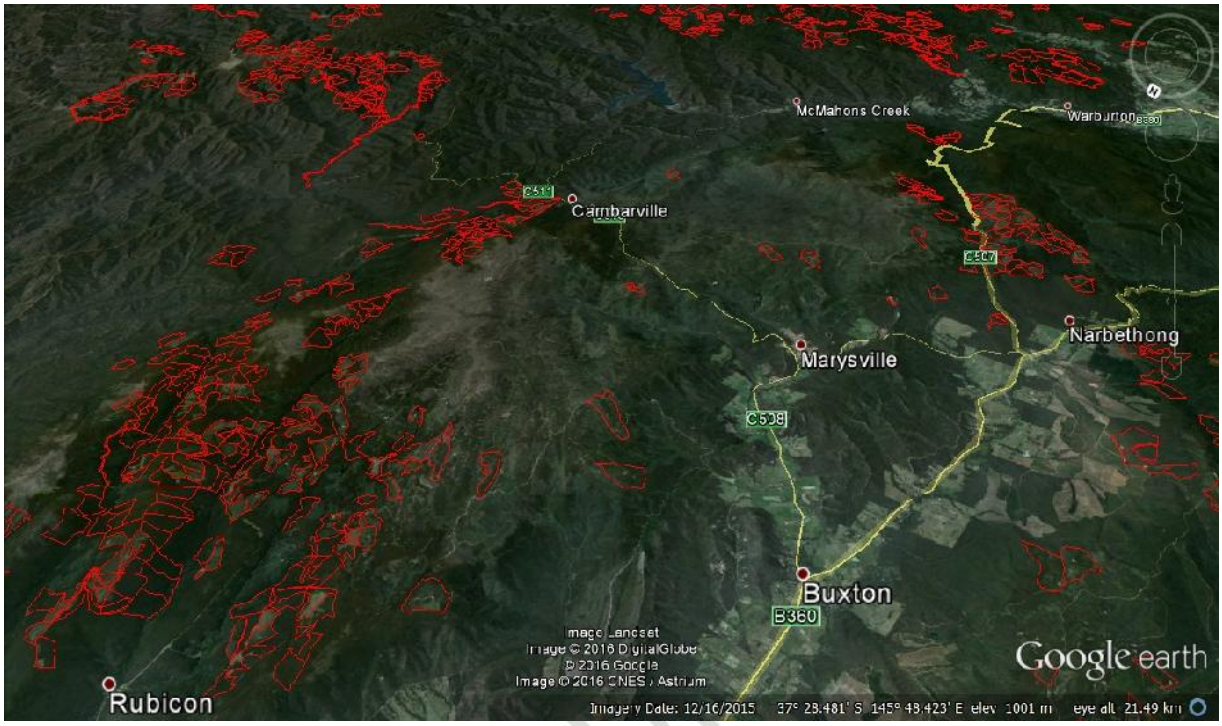
Harvesting at this level on top of overall forest losses of 10,000 ha in the 2009 fires is far from ecologically sustainable.



Sources and assumptions

See Appendix D

The scale of the forest damage inflicted by the 2009 fires can be seen in a recent Google Earth[12] image which shows the areas set to be logged (or already logged) under the current timber release plan 2013-2016. The unmarked lighter green area in the middle corresponds largely to the area of forest killed in the 2009 Murrindindi fire.



Another view focussing only on the Rubicon area is shown below. The left side corresponds to part of the forest killed in the fire.

[12] With acknowledgements to Google Earth for its permission to use these images

Chapter 2: Other forest values being compromised or lost

This section explores what other forest values are being or will be lost, if current harvesting rates are not cut immediately. Biodiversity tops the list of forest values in peril, but the area's overall conservation value is also threatened. These two elements are examined in the context of specific VicForests commitments that focus on their protection.

Biodiversity

The expansion of harvesting in the Rubicon since 2007 has had a range of consequences for the area's biodiversity. VicForests' efforts to protect leadbeaters possum habitat and potential habitat, such as via regrowth retention harvesting[13], are commendable, but the scale of logging over areas that would otherwise become prime habitat means that such steps may not provide sufficient opportunity for new colonies to become established and thrive, especially given the importance of a substantial understorey tree canopy to assist their movement through the forest.

Clearfelling systems fail to safeguard the diverse understorey and ground flora that exist in most native forests that have been long undisturbed[14]. The accompanying ground disturbance, soil exposure and burning may not suit the seeds of all understorey species, as well as reducing their chance of vegetative renewal. It also allows noxious weeds, especially blackberries, to gain a foothold. In time the closing canopy of the regenerating forest will do much to halt their spread, but blackberries for example will simply remain dormant waiting for an opportunity to recolonise as the canopy thins out and openings occur.

[13] See http://www.vicforests.com.au/leadbeaters-possum1/regrowth-retention-harvesting-1

[14] See for example Hickey, J.E., Neyland, M.G. and Bassett, O.D. (2001). Rationale and design of the Warra Silvicultural Systems Trial in wet *Eucalyptus obliqua* forests in Tasmania. *Tasforests* 13: 155-82.

The following picture shows an area of regenerating forest, mainly comprising wattle but with two eucalypts visible, where blackberries are rampant.

The picture below shows an alpine ash area on No. 6 track of logged over a decade ago with ground cover dominated by blackberries.

Feral animals, in particular deer that are in almost plague proportions, also contribute to the loss of biodiversity by browsing understorey species before they can become established. The patchwork of open ground that intensive logging leaves in its wake provides ideal conditions for deer to multiply and do much damage.

And in those areas that have failed to regenerate properly, the disturbances associated with a second regeneration burn will further reduce biodiversity.

An examination this year of recently logged alpine ash coupes on the top of the Royston Range where regeneration burns had taken place found ample evidence of regeneration failure. What might have appeared at first glance to be young ash seedlings was in fact mountain hickory wattle, with wide areas devoid of ash seedlings.

Regeneration failures in the area go back a considerable time with one coupe that had been logged around a decade ago covered in mountain hickory wattle, as shown below. A solitary alpine ash is present but cannot be discerned.

High conservation value of unlogged areas in Rubicon area

Given the extent of past and planned logging in the forests of the Alexandra district (Blue Range, Rubicon and Royston Range down to Mt Bullfight and Mt Margaret), plus the impact of the 2009 fires at the southern end, the Group considers that much of what currently remains unlogged is a prime candidate for High Conservation Value (HCV) status.

In the absence of the fires and recent past logging, the values of the unlogged areas would have been widespread, not necessarily deserving special status. However with each additional coupe logged the value of what remains unlogged increases to the point we have now reached where HCV designation is certainly warranted. This circumstance is recognised in VicForests HCV policy document which states that VicForests will "undertake landscape-level desktop assessment to consider adjacent land management objectives, condition and history of the surrounding forest."[15] In support of protecting this area from continued intensive logging we draw attention to the following conservation values:

- cultural values, in particular the Rubicon Historic Area and associated camping grounds which are promoted as a tourist destination by DEWLP. While the relics on the Rubicon Range have been given a moderate level of protection parts, of it were recently logged. Such relics as might have been there will have destroyed or removed. However any remaining relics on the Royston Range are totally unprotected and are likely to disappear as logging proceeds steadily northward.
- old growth forest values, in particular the fact that there will be almost no potential for a reasonably intact area of old growth ash forest to eventually develop recognising that the nearest accessible old growth ash area is far to the south on Mt Donna Buang. There are no areas of old growth alpine ash, and will not be for more than 100 years unless logging is halted
- educational values – which stem from the fact that Camp Jungai and the Outdoor Education Centre are both nearby, as well schools in Alexandra, for whom the opportunity to explore and understand an intact ash forest ecosystem, and actually see the history of the area will be lost. Both these camps are already suffering greatly from the log truck traffic and the loss of the area's general character.
- threatened species values – given that the area is known to have held a leadbeaters possum colony until recently when the particular coupe (Flea Creek) was logged and the colony subsequently killed when the regeneration burn killed the trees in the area reserved to protect them
- biodiversity values – especially the loss of floristic diversity due to the overall scale of recent logging and the Black Saturday fires
- scenic values – while scenic values may not figure in VicForests' high conservation value statement, we lament the ruin of a key vista from Rubicon immediately adjacent to the special protection zone that was drawn up to protect this very value. The northern end of the Rubicon area is close to the popular holiday destinations of Eildon and Thornton, and as well as the historic area has some lovely natural attractions (e.g. Royston falls, Snobs Creek falls, Rubicon Falls). Continued logging will jeopardise many opportunities for expanding forest based recreation (e.g. mountain biking, horse riding, bushwalking, car touring) in this area.

[15] VicForests *Strategy for Assessing and Maintaining High Conservation Values Consultation Draft 2.0*

In recognising the high conservation value of the area the Group also notes the following proposition in VicForests' strategy:

> *"In general terms all natural forest areas within VicForests Available forest area are considered to provide environmental, cultural, economic and social values. Where particular attributes are considered to be of significant importance for conservation and face substantial threat of severe or irreversible damage, these can be defined as High Conservation Values (HCV).*
>
> *Identifying which values should have high conservation status depends on working out which attributes or values are significant and important for conservation over and above others.*
>
> *VicForests acknowledges that determining whether or not something is significant or whether it is important is inherently subjective so we have tried to develop robust, objective systems and procedures to measure these terms. We welcome your feedback on the process described in this document.*
>
> *In practical terms, significant values are those recognised as being either unique, or outstanding relative to other examples in the same region, because of their sizes, numbers, frequency, quality, density or socio-economic importance, on the basis of existing priority frameworks, data or maps, or through field assessments and consultation (Common Guidance for Identification of HCV, May 2013).*
>
> *Any value or attribute can be designated as HCV by considering its significance for conservation, its location within the forest and the residual threat imposed on its continued existence. All potential values are herein termed 'candidate HCV' and remain as candidates until such time that the significance, its location or circumstances surrounding threats to its existence are elevated and warrant a change in status and designation as a HCV."*[16]

We also note that VicForests has just adopted an Ecologically Sustainable Development Plan with a number of worthy objectives[17]. While it has set a range of targets by which it proposes to measure its progress in achieving these objectives, these targets are, at best, only partial measures of success.

Appendix E sets out a table rating how well we believe these objectives are being met, and are likely to be met in the future, based on the findings in the report.

[16] VicForests *Strategy for Assessing and Maintaining High Conservation Values Consultation Draft 2.0,* p.13
[17] VicForests, 2015 *Ecologically Sustainable Forest Management Plan*

Section 3: Proposed Next steps FOR GROUP DISCUSSION

The group believes that the only way of protecting the remaining values of the Rubicon forests is for all logging in the area to cease forthwith. Recognising that this may not be readily achievable, the group seeks

a) an immediate halt to the proposed logging of all coupes on the north ends of the Torbreck, Royston, Rubicon and Blue Ranges, specifically north of latitude XXX (TBD e.g. 37°24'), this being the area least impacted by logging to date (although still heavily affected nonetheless)
b) A review of all coupes south of this line that are slated for logging in the near term in consultation with the group
c) A commitment by VicForests to revise the methodology used in determining 5 year harvesting limits in the Allocation Order to ensure that limits are genuinely sustainable in the long term taking into account all forest values, and
d) A commitment by VicForests to publicly disclose detailed information on harvested areas, log yields and other harvesting attributes, as well as fire-killed and fire-damaged stands at the FMA and Forest District Levels
e) A commitment by VicForests to provide weekly email alerts notifying all members of the public who seek to be notified of all coupes expected to be opened for harvesting or roading in the ensuing six months, and
f) A commitment by VicForests to place all coupe plans (harvesting and roading) on the web at least 3 weeks prior to scheduled commencement of operations.

Appendix A

	Statewide (ha)	Central FMA (ha)		
Ash forest area within *State Forest*	286,000	64,000	22%	2014 Area Statement (VicForests)
Ash forest area available for harvesting excluding special protection zones and conservation reserves	241,000	48,000	21%	2014 Allocation Order, with Central FMA figure derived from % set out in VicForests' 2015 Ecological Sustainable Forest Management Plan (p.11)
Ash forest area available for harvesting excluding special protection zones, conservation reserves, riparian buffers and slopes > 30°	159,000	36,000	23%	VicForests 2014 Area Statement (Table 4)
Ash forest area available for harvesting (excl. thinning) in harvestable stands, excl. special protection zones, conservation reserves, riparian buffers and slopes > 30°	**80,440**	**n.a.**		2004 Allocation Order (Government Gazette), sum of individual statewide allocations in 2014-2019 denoted as ash
Average annual harvest limit for ash forests (gross area) for current period:				
in 2004 Allocation Order	2,980	772	26%	Allocation Order figures (Government Gazette) for final 5y periods divided by 5, multiplied by 2 being the average ratio of gross to net area in the current Timber Release Plan and then rounded.
in 2007 Allocation Order	2,500	820	33%	
in 2010 Allocation Order	2,880	n.a.	-	Allocation Order figures (Government Gazette), 5yr total for present period divided by 5
in 2014 Allocation Order	2,840	n.a.	-	
Annual gross harvest area, 2010-11 to 2013-14	2,680	n.p.		2014 Area Statement with 2013-2014 figure from 2014 Sustainability Report, p9
***Estimated* gross harvest area in 2015**	2,558	1,420	56%	Timber Harvesting Safety Zone list (20 Jan 2016) matched by coupe address with August 2015 TRP to get gross harvest area
***Estimated* gross harvest area 2013-2016**	2,840	1,250	44%	Multiply 2,840 (average annual ash forest harvest limit) by 44%, as the proportion of TRP coupes in Central FMA

Appendix B

80,000	**2004 Allocation Order (Government Gazette) figure for ash stands for 2014-2019, rounded**
-18,000	2014 Area Statement (2004-2005 to 2012-13), plus 1,300 in 2013-14 (2014 Sustainability Report), plus 1,300 in 2014-15 (est.)
-20,000	2007 Allocation Order (Government Gazette) for stands killed in 2006-07 fires
-7,000	2010 Annual Report, p.10, area of harvestable ash killed in 2009 fires
-1,600	Areas reserved as Leadbeaters possum habitat as reported in VicForests 2015 Sustainability Report, Table 1
3,000	Rounded guesstimate of salvage logged area of stands killed in 2006-07 fires
1,600	2010 Annual Report, p.10, salvage logged area of harvestable ash killed in 2009 fires
38,000	
10,000	Rounded estimate of areas harvested since 1950s coming on stream over next 20 years
-30,000	Conservative allowance for harvestable areas that will be killed by fires in next 20 years
18,000	

Appendix C

Is there adequate progress towards sustainability goals?

Gaps in DEPI's state forest and timber resource management performance reporting make it difficult to assess how well DEPI's and VicForests' efforts are contributing to sustainable outcomes.

There are regional goals for sustainable state forest management but no overarching goal. There are no regional objectives, performance measures and targets but these are needed so that DEPI can measure the progress and success of its state forest management activities. DEPI is developing a new approach to public land planning and intends to develop regional objectives, measures and targets as part of this process. It will also need to develop an overarching goal for state forest management.

DEPI also has goals and objectives for sustainable timber resource management. VicForests develops corporate objectives, measures and targets aligned with these. Its reporting on them demonstrates VicForests' achievements in improving sustainable timber harvesting management over time.

However, until recently DEPI's measuring and monitoring to assess progress in achieving forest and timber management objectives and goals was weak and lacked reliable data. It is taking important steps towards addressing this by establishing new forest monitoring and improved data collection.

DTF and DEPI manage their roles in supporting the Minister for Agriculture and Food Security and the Treasurer well. The Treasurer, as the shareholder of VicForests, receives regular, formal communication, and DTF reviews VicForests' corporate plans and quarterly financial reports. DEPI appropriately supports the minister in overseeing VicForests by monitoring its corporate governance, compliance with legislative obligations and commercial functions. DEPI is further clarifying the respective roles and responsibilities of the agencies involved in the native timber industry.

Is timber being harvested at a sustainable rate?

DEPI has an established process for deciding where in the forest harvesting can occur and uses its forest management zoning scheme to define these areas. However, there is limited transparency of the assessments DEPI has made when making decisions to amend the forest zoning, and it has not adequately reviewed the scheme over time. This means there is uncertainty about the extent to which the current harvesting areas are consistent with DEPI's harvesting and conservation objectives.

VicForests is harvesting at or within its estimated sustainable harvest level, and harvests less than the area that DEPI allows it to. VicForests continues to improve its largely effective approach for estimating the sustainable harvest level, although there are a number of ways it can improve its 20-year planning for where and when to harvest. It is also well placed to continue to modify its approach over time as circumstances change.

Is harvesting being managed to protect forest values?

DEPI has designed a suite of measures and plans to limit the impacts of activities such as harvesting on forest values. These include setting aside conservation areas, allowing harvesting only in a small proportion of the forest, and specific actions to manage animal and plant species threatened by harvesting and other activities. DEPI's effectiveness in protecting forest values from harvesting is reduced because it has failed, in some cases, to develop the plans needed to do this, and in many cases it has failed to track and review the progress made and the results achieved.

Until recently, DEPI's measurement of how well forest values are being maintained over time was poor, making it difficult for it to provide assurance about how well values are being protected. The comprehensive forest monitoring program it introduced in 2010 and additional data it is currently collecting are aimed at addressing this gap. VicForests is meeting its responsibilities to limit the potentially adverse impacts of harvesting on forest values. It has developed a system of management plans and actions to do this, in line with the purposes and principles of the Sustainable Forests (Timber) Act 2004. Its effectiveness is confirmed by external audits of its operations by DEPI, and its independent certification to the Australian Forestry Standard.

DEPI and VicForests have designed their management approaches to protect biodiversity values in a precautionary way. As part of this, they each need to improve and better document the way they assess the threats and consequences associated with biodiversity management decisions in harvesting areas and develop more transparent processes in managing the risks and trade-offs involved.[18]

[18] Victorian Auditor-General's 2013 report *Managing Victoria's Native Forest Timber Resources,* pp.x-xi

Appendix D

20,000	**Total available harvestable ash stands as in 2004 Allocation Order (80,000) multiplied by 25%, being the proportion of allocated stands from Central FMA**
-6,000	Estimated from 2004 and 2007 Allocation order for Central FMA allocations (2004-2010) and statewide allocations in 2010 and 2014 Allocation Orders multiplied by 44%, being the proportion of Central FMA coupes in 2015 TRP
-5,000	Total harvestable stands killed in 2009 fires (7,000 ha as per 2010 Annual Report, p.10) multiplied by 70% being the estimated proportion in Central FMA.
-1,000	Estimated Central FMA share (rounded) of areas reserved as Leadbeaters possum habitat (1,600 ha as per 2015 Sustainability Report)
1,000	Total area salvage logged following 2009 fires (1,600 ha as per 2010 Annual Report, p.10), multiplied by 70% being the estimated proportion in Central FMA.
9,000	
-	No post 1939 ash stands in Central FMA are expected to come on stream in next 20 years
-4,000	Conservative allowance for harvestable areas that will be killed by fires in next 20 years
5,000	

Appendix E

VicForest Objective	Assessment	Comment/explanation
Achieve and maintain third-party certification	??	The very close resemblance some regenerating ash forest stands in the Rubicon area to plantations could potentially put FSC re-certification (originally planned for 2015) at risk
Manage compliance with the Code of Practice for Timber Production (CFP)	↔	While we believe we have seen numerous examples of non-compliance in the Rubicon ash forests, we have also seen plenty of examples of compliance
Continuously improve the ecologically sustainable forest management (ESFM) system	??	Since the Ecological Sustainable Forest Management Plan has only just been published we cannot judge if this is the case
Enhance capacity to deliver research programs	--	
Undertake research to inform improvements to biodiversity management	↔	While VicForests is certainly conducting or sponsoring research to this end, too little is being done on issues associated with plant species diversity
Cultivate new research and advisory partnerships	--	
Maintain and implement a High Conservation Value Strategy (HCVS)	??	It may be to soon to tell, but so far it would appear that only one 'landscape scale' protection measure, the widened adoption of regrowth retention harvesting, is underway
Incorporate stakeholder perspectives relevant to biodiversity conservation	↔	in our experience, sometimes this happens, sometimes not
Assess and protect biodiversity values at operational and landscape scales	↓↓	this submission demonstrates this is not the case
Diversify and maximise timber product recovery and associated services	--	
Meet commitments to customers and contractors	--	this is not known to us, but we assume meeting timber contracts is one of VicForests' top priorities
Demonstrate benefits from our activities to Victorian economy	--	The native forest timber industry has been part of the Murrindindi economy for well over a century, providing jobs for many, supports regional processing industries, particularly in Gippsland, and is a significant part of the wider Victorian economy.
Support Regional Community interests	↔	Some regional community interests are supported, mainly harvesting, haulage and processing industries and associated businesses, but not nature-based tourism businesses
Actively contribute to bushfire management and suppression	↔	VicForests certainly assists bushfire suppression but where harvesting results in high fuel loads persisting for some time this may possibly increase fire risk compared with no logging
Maintain the capacity of the forest to service non-wood products and values	↓↓	this submission demonstrates this is not the case
Understand the available forest resource	↓↓	this submission demonstrates this is not the case
Maintain production in accordance with sustainable harvest principles	↓↓	this submission demonstrates this is not the case
Effectively manage risks and uncertainties in timber resource modelling	↓↓	this submission demonstrates this is not the case
Implement timber harvesting systems that balance silvicultural and ecological objectives	↔	the adoption of regrowth retention harvesting in many coupes is positive, but the intensity and scale of harvesting in the area's remaining unburnt ash forests is not
Monitor long-term impacts and benefits of harvesting practices	--	this needs at least a 30 year timeframe, but at current harvesting rates the native forest timber industry - at least that part depending on ash species - will have disappeared by then
Continuously review and evolve silvicultural practice	--	We acknowledge VicForests' recent adoption of regrowth retention harvesting, but beyond that we are not in a position to judge
Maintain forest health and vitality	↓↓	Loss of species diversity, regeneration burns escaping into unlogged areas, blackberry infestations and deer in plague proportions exemplify VicForests' failure here
Maintain a sufficiently stocked viable and representative seed store	--	This may be the case for overstory species, but not for understory species whose regeneration post logging is not always assured
Minimise risks to known values during regeneration	↔	Many alpine ash sites in the Rubicon forests have failed to regenerate properly and therefore the need to return to them, suggests risks have not been minimised
Improve processes for cultural heritage management	--	Current logging in the Rubiocon Historic Area and surrounding forests means that some cultural heritage (e.g tramway relics) is almost certainly lost
Support traditional owner settlement agreements	--	
Strengthen relationships with Indigenous groups	--	
Increase opportunities for direct engagement	♫	We have found VicForests to be responsive to requests we have made for information
Use stakeholder feedback to improve practices or processes	--	Whether or not this is true overall can be known only to VicForests, but obviously not all stakeholder groups carry the same clout
Resolve all disputes fairly and efficiently	--	
Report progress against VicForests ecologically sustainable forest management objectives	--	Since the ESFM document was only published in December it is too soon to tell
Be responsive to stakeholder enquiries/complaints	↔	VicForests is generally responsive to our inquiries, although mostly to defend its actions
Provide public access to VicForests information	↔	VicForests make much data publicy available, but not some critical data elements, esp areas logged (gross and net) and available area, by forest type and by forest district, over time

↓↓	Objective not being met
↔	sometimes/ in part
♫	Objective being met
--	not assessed
??	too soon to tell