

Main issue: Overcutting

On its creation in 2004, VicForests was allocated timber resources by forest type and forest management area (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.

In 2010, to give VicForests greater flexibility in scheduling timber supplies, and concerned about its profitability and ability to meet its timber supply contracts, the Government changed the allocation rules. Rather than being set by FMA, harvestable timber areas were now allocated on a statewide basis and instead of being partitioned according to a range of forest types only two types were specified: 'ash' and 'mixed species'. And whereas the statewide ash forest area allocated for harvesting was cut after the 2007 fires, the ash forest area allocated to harvesting after the 2009 fires was lifted despite 13,500 ha of ash forest being killed, of which 7,000 ha were harvestable stands¹.

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 dramatic:

- In each of the past two years (2014-15 and 2015-16) around 760 hectares (*net*) of ash forest in Central FMA has been clearfelled representing over half (54 per cent) of the total area of ash forest harvested statewide². Yet the **Central FMA accounts for less than a quarter (22%)** of the total area of ash forest available for harvesting³.
- In 2004 when, VicForests was established, and again in 2007, the *gross* harvestable area for the Central FMA in this period (2014-2019) was specified as around 800 hectares per annum (782 ha p.a. and 820 ha p.a. respectively)⁴. But the figure of 800 ha (*gross*) converts to a *net* harvest area figure of just 400 hectares, which means that the Central FMA is **now providing almost double** the harvesting area envisaged when VicForests was created. And this is despite the loss of 13,500 ha in the 2009 fires.
- Assuming the *harvestable* area of ash forest in the Central FMA was originally around one quarter of the statewide figure of 80,440 ha⁵, ie 20,000 ha, (actual Central FMA figure not published), then allowing for fire losses of around 5,000 ha of harvestable stands (*net*), less fire killed stands that were salvage logged⁶, plus total harvesting from 2004-05 to 2015-16 of 8,564 ha, plus areas reserved for Leadbeater's possum, then **continued logging at the present rate will see the Central FMA forests totally exhausted within ten years, or sooner in the event of another major fire.**

¹ VicForests 2010 Annual Report, p.8

² Data provided by VicForests to RFPG under an FoI request

³ VicForests 2014 Area Statement, Table 4

⁴ 2004 and 2007 Allocation orders, Government Gazette

⁵ Ibid.

⁶ VicForests 2010 Annual Report, p.10

Future fires in the context of Central FMA comprising young forests (<20 years old)

VicForests timber supply planning makes no allowance for future bushfires, yet with global warming such fires are projected to become more frequent. Major fires in the ash forest of Victoria occurred in 2003, 2006-07 and 2009.

VicForests has relied on research showing no correlation between the age of forest stands and fire damage in intense fires. This research is contradicted by a Melbourne University study which found that forests aged 7-36 years old are most susceptible to being killed in the event of intense fires. This study has been dismissed by the acting head of VicForests as a non-issue⁷!

Yet at current harvesting rates vast areas of the central FMA will be in this high risk younger age class for many years to come. And if such fires occur in forests <20 years old there won't be even enough seed to ensure natural regeneration, so these areas could all be converted to wattle forest. The impact of this on forest biodiversity would be incalculable.

Given the devastation caused by the Black Saturday fires, the public would expect VicForests to take a prudent approach and curtail the extraordinarily high rate of logging now occurring in these forests so as to leave substantial intact areas of maturing 1939 regrowth ash that can act as a buffer when the next major fire inevitably occurs.

The scale of the damage inflicted by the 2009 fires can be seen in a Google Earth image which shows the areas set to be logged (or already logged) in the Rubicon State Forest under the current timber release plan 2013-2016. Areas of killed forest appear as grey.



⁷ The Age letters to the editor 16/1/17

Adjoining coupes combined to form giant coupes in contravention of the Code of Forest Practice

Increasingly, RFPG has observed areas where aggregate logged areas of adjacent coupes exceed permitted threshold of 120 ha over a 5yr period, incl. group of most northerly coupes on top of Royston Range incl. Flea Creek (138 ha) and group of coupes around Hobin Gap (211 ha). This is in clear breach of clause 2.4.1.2 of the VicForests 2014 Management Standards, which are part of the *2014 Code of Practice for Timber Production* which VicForests is obliged to comply with.

Clause 2.4.1.2 states

The maximum aggregated size of coupes that contain clearfall, seed tree or shelterwood 1 is 120 ha net harvested area within a 5 year period.

The two attached Google Earth images show this very clearly in the Rubicon State Forest (See files "Flea Creek and adjoining" and "Hobin gap"). It is certain that many other similar breaches exist in the Central FMA, especially in the Marysville State Forest.

The fact that VicForests find it necessary to concentrate logging in this way reflects just how intensively the forest is being logged and how profitability is placed ahead of biodiversity protection.

The Department of Environment and Planning (DELWP) – the State Government Department responsible for monitoring compliance with the Code – has been sitting on its hands despite these breaches being drawn to its attention well over six months ago.

This pattern of logging, which certainly occurs elsewhere in the Central FMA also contravenes specific elements of the Code of Forest Practice itself, namely clauses 2.2.2.8 and 2.2.9.

2.2.2.8. Long-term (strategic) forest management planning must incorporate wildlife corridors, comprising appropriate widths of retained forest, to facilitate animal movement between patches of forest of varying ages and stages of development, and contribute to a linked system of reserves.

2.2.2.9 Modify coupe size and rotation periods to maintain a diversity of forest structures throughout the landscape.

Other breaches of the Code of Forest Practice

The RFPG has observed numerous breaches of the **2014 Code of Practice for Timber Production** including

- Corded log loading areas not rehabilitated, including [check which coupe]. **Refer clause 2.4.1.2 of 2014 Management Standards.**
- Landscape sensitivity areas not identified, or if identified not properly acted upon including Flea Creek, Calvin, Little Jacqui and Archibald. **Refer clauses 5.3.1.5 (Calvin, Little Jacqui and Archibald) and 5.3.1.6 (Flea Creek) of 2014 Management Standards.**
- Failure to protect streams, such as Flea Creek headwaters (incl. source spring), with appropriate buffer strips. **Refer clause 3.3.1.1 of 2014 Management Standards.**
- Exceedance of 50 ha threshold in a rolling 5yr period for logging RVHA (Little Jacqui, 26 ha + Archibald, 23.5 ha + Calvin roading 2.5ha = TOTAL 52 ha) **Threshold as advised by VicForests – source authority not cited.**
- Significant losses of retained trees in coupes following regeneration burns. **Refer clause 7.2.4.1 of 2014 Management Standards.**
- Minimal if any field surveys for flora and fauna for proposed logging roads, log dumps and coupes with reliance on existing database records. **Refer clauses 2.2.2.2 and 2.2.2.3 of 2014 Code.**

And overall failure of planning processes to properly comply with the critical overarching Mandatory Actions under the Code, set out in clause 2.1.1.1, which states

Long-term forest management planning must:

- i. meet the requirements of this Code and the Management Standards and Procedures;
- ii. provide for the perpetuation of native **biodiversity**;
- iii. maintain a range of forest age classes and structures;
- iv. identify and mitigate impacts on all cultural heritage values;
- v. minimise impact on water quality and quantity within any particular catchment;
- vi. minimise adverse visual impact in **landscape sensitivity areas**; and
- vii. facilitate effective **regeneration of harvested forest.**

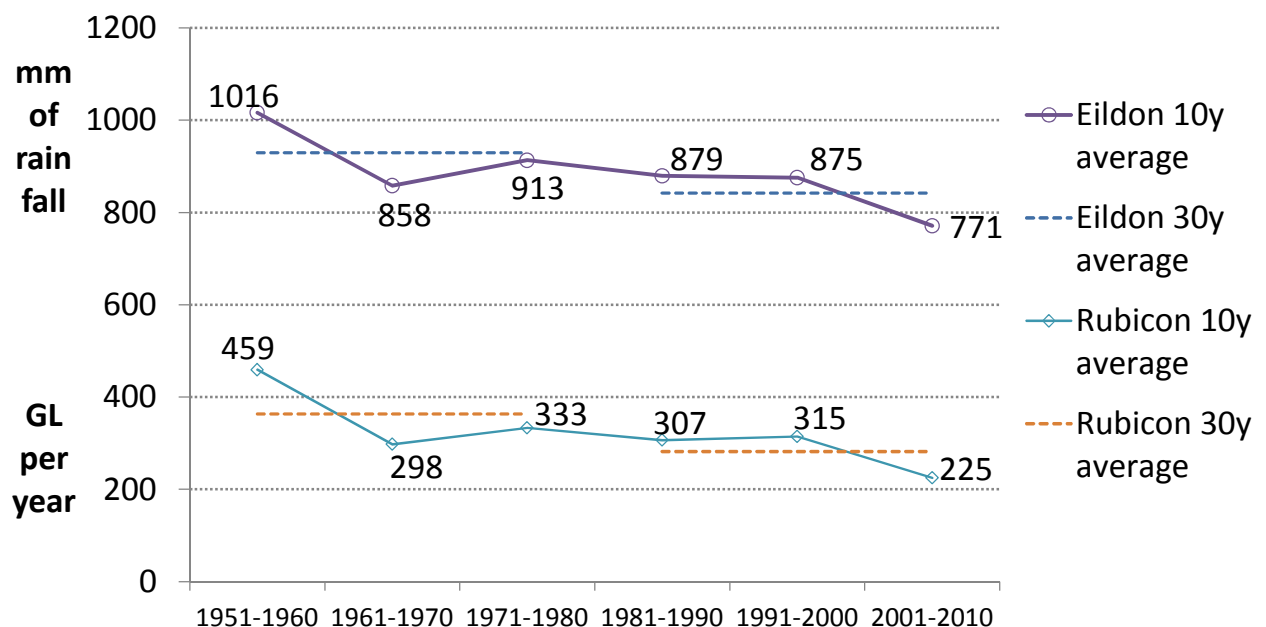
Water yield

As is now well established, the harvesting or killing by fire of '39 regrowth mountain ash forests (and very likely alpine ash forests as well) will lead to an initial rise in streamflow due to reduced transpiration, but after about 10-15 years the growing forest will start to use more water than before, and this effect of lower water yield will last many decades.

In the context of:

- declining rainfall and hence streamflow due to long-term climate change (see chart below),
- the forest losses in the 2009 fire, and
- the extensive logging of the remaining '39 regrowth forests,

this lowered water yield could have serious long-term consequences for downstream users.



Data sources:

Bureau of Meteorology website (Eildon rainfall)

Vic Government water data website (Rubicon flow)

20 years ago, the Victorian Government accepted a recommendation of its then Land Conservation Council (LCC), now reinvented as the Victorian Environment Assessment Council (VEAC), as follows:

“That management of the Rubicon Catchment be such that the quality and quantity of water meets the requirement of Generation Victoria [now AGL] and downstream users”.

Recommendation D22(iii), of the Land Conservation Council’s 1994 Melbourne Area 2 Report.

While the State Government’s acceptance of this recommendation has not been translated into any formally designated land use change, it clearly behoves all Government agencies to heed it, especially in the light of forest losses in the 2009 Black Saturday fires. But despite the extensive harvesting it has conducted in the Rubicon River catchment in past 10 years RFPG has seen no evidence that VicForests has done so.

Loss of nature tourism opportunities in an area still suffering from Black Saturday

The ongoing impact on current and future tourism opportunities in the Rubicon State Forest due to a combination of the 2009 fires and the scale and intensity of logging in the area is one of the key concerns of the RFPG.

While timber harvesting may be the highest priority forest use in the General Management Zone it is certainly not the only use. The Central Highlands Forest Management Plan has this to say about the GMZ:

Forest in this zone will be managed for the sustainable production of sawlogs in accordance with the Code and more detailed local management prescriptions. Other management aims include protection of landscape and water quality, provision of recreation and educational opportunities, fire protection and conservation of natural values to complement adjacent zones. (p.8)

Landscape is a key tourism value and it is critical to note that the existence of a particular value or permitted use in an adjacent forest management zone (SPZ, SMZ, or reserve) does not mean that value or use can be considered as having been adequately dealt with in the GMZ. For example, the Coupe Plan for Calvin states that there are no landscape issues associated with this coupe. When we inquired as to the basis for this claim, we were advised by Liz Langford that this stems from the fact that the Central Highland Forest management plan protects landscape by virtue of Table 9, which references views of the escarpment from the GV highway that are protected in the nearby SPZ. This is not relevant since consideration must be given to landscape values applicable to that particular coupe. Landscape values for this coupe, and for the entire western flank of the north end of the Royston Range, stem from its proximity to an important tourist road, this being the Royston River Rd which access the whole hinterland and the Rubicon Valley Historic Area.

Similarly, coupes on the top of the Royston range, on its eastern flank (as well as many coupes on the Middle Range and Blue Range) are highly visible from Mt Torbreck, which lies with a natural features reserve. How can it be considered compatible with a natural features reserve for much of the surrounding forest to have been so heavily logged?

In the case of the Flea Creek coupe, the Government adopted LCC recommendation requires the views of the forested escarpment from the GV Hwy to be protected, and despite entreaties from local residents the escarpment was logged and a huge visible scar created that will take decades to disappear. This area was also a key destination for horseback tours conducted by Rubicon Valley Horse Riding – a licensed forest tourism operator – but their entreaties for this area to be protected were entirely ignored.

Similarly the tourism experience for visitors to the Rubicon Valley Historic Area is greatly damaged by the extensive logging en route to the Rubicon River Road which is the only 2WD access road.

Another potential tourist attraction of the area that is being degraded by the widescale logging is the development of a proposed geo-tourism venture focussed on the Great Cerberean caldera, the site of one of the biggest eruption events in the history of the Earth.