



Critical deficiencies to be addressed in next iteration of VicForest's two FSC documents

Rubicon Forest Protection Group

30 June 2019

HCV Systems document

1. Table 2 on page 7 is misleading. DELWP shares responsibility with VF at the coupe and FMU levels – it is not just a stakeholder.
2. Section 3.3.1 on p.7 need to be split into the regional/landscape scale and the State scale if the document is to accurately reflect VF's role at the landscape scale. Table 2 acknowledges that VF also has a role at the regional/landscape level as indeed it acknowledges in the 3rd dot point under HCV2 on p.14.
3. The suggestion that FMZs reflect available information on the uses and values of the forest (including natural, cultural, social, resource and economic (1st para, p.8) is incorrect. The only substantive FMZ changes that DELWP has introduced since the CH FMP was adopted relate to timber harvesting exclusion zones (THEZs) for leadbeaters possum. Protection of all other values is now 20 years out of date.
4. The claim that the forest management zones incorporate mapping of values that encompass known HCVs (2nd para, p.8) is incorrect. No FMZ changes have been made to protect the greater glider in the Central Highlands since it was listed as threatened.
5. The suggestion that the signing of revised RFAs in March 2020 will also have dealt with HCV protection (3rd para, p.8) is mistaken since there will still be many unresolved issues, including FMPs and CAR review not finalised. In the meantime VF is obliged to take its own steps to protect all threatened HCVs at the regional and coupe level.
6. The suggestion that "landscape-level conservation measures are addressed at the State and regional level through RFA and forest management planning processes" (last para page 8) implies that VF has no role in landscape level conservation. This would be incorrect. VicForests has acknowledged in Table 2 and elsewhere that it shares responsibility with DELWP for protecting HCVs at a landscape scale.
7. An example of a landscape-scale HCV protection that this document and the harvesting and regeneration systems document overlooks is the need for effective wildlife corridors as per Code clause 2.2.2.8. This Code clause relates to "long-term strategic planning" and the revised document needs to acknowledge that the TRP is

in fact a long-term strategic planning tool, meaning that this is not simply a matter that can be left to DELWP.

8. Under the HCV Management section (p. 16 et seq) VicForests should disclose its understanding of its obligations under Code Clause 2.2.2.2 (the Precautionary Principle). As part of this VF should include its internal "Instruction" relating to the precautionary principle as an attachment to this document.
9. The document states (p.14) that that HCVs 2-4 will be "identified" but gives no indication of how these are to be protected. This needs to be corrected. For example, in relation to HCV 2 we suggest that the only way of protecting the landscape-level ecosystems and mosaics within the Rubicon State Forest – which certainly fall within the FSC definition of high conservation value – will be to cease logging, at least until the evaluation of its values has been completed through the RFA modernisation process, including the adoption of a new Central Highlands FMP and an updated evaluation of the ability of the reserve system to meet the CAR criteria. Failure to do this would certainly breach the precautionary principle.
10. In relation to HCV 5 (page 14) we underline the importance of water-related values that Central Highlands forests provide, both water quality and yield. This is of particular importance in Snobs Creek – whose catchment is currently being logged - given its importance for the hatchery and people in the Snobs Creek community whose livelihood depends on it remaining viable in the long-term.
11. The document recognises the importance of stakeholder input into HCV identification and protection (4th para, p.16), so this document should commit VicForests to routinely publishing in a timely manner coupe plans and harvesting schedules.
12. The approach described for assessing HCVs at a landscape level (6th para, p.16) is deficient, relying as it does on current GIS data which will miss a raft of critical HCVs. Coupe by coupe assessments focusing largely on particular threatened species and habitat trees fails to properly address the wide ranging impacts of logging activities on landscape scale biodiversity and population trends of representative indicator species including pre and post logging.

Extensive stakeholder consultation is clearly essential for the identification of all HCVs This is acknowledged but the next iteration of this document needs to resolve the apparent contradiction that will see this process completed speedily (see last sentence, 1st para in section 4.2, p.13), and simultaneously take 5 years (Fig 5, p.17). Given the fact that many HCVs in the Rubicon State Forest and surrounding landscape are already highly compromised and could soon be lost, the expectation that the assessment and protection process may take 5 years is unacceptable.

13. No reliance should be placed on the retention of isolated habitat trees for HCV protection (para 2, p.24). Habitat trees should be retained along with surrounding trees in connected patches with a minimum size of at least 2 ha, recognising the needs of species such as the Greater Glider and other gliders for which isolated trees are of little value since they do not allow dispersed foraging.

H&R Systems document

1. This paper includes qualifications and ambiguities about exactly what the new systems will entail; the areas over which they will be applied; and the timelines for their application. Without more precise and unambiguous specification it will be difficult to hold VicForests accountable.
2. The proposal to only “progressively reduce” (last para, section 3.2.2, p.7) current high levels of clearfelling is insufficient, especially since the specification of the system envisages it will continue to be widely used in even-aged '39 regrowth ash forests:

This system is designed primarily for relatively uniform regrowth Ash forests, which require a receptive seedbed and substantial gap sizes for effective regeneration. In these forests, there are typically very few if any hollow bearing trees, and coupes are marked out to ensure any HCVs are retained and protected outside the net coupe area. (p.16)

As discussed above the idea that HCVs are confined to HBTs, old growth stands, and threatened species habitat is incorrect.

Continuing the widespread use of clear felling in even-aged '39 regrowth ash is at odds with the commitment to recreate lost structural complexity:

On coupes or in areas where a history of timber harvesting, or other anthropogenic disturbance, has disproportionately removed habitat trees, structural complexity will be created by retaining both extant habitat trees and a selection of regrowth trees, i.e. the next habitat cohort. (last sentence of 1st para on page 7)

Many areas of '39 regrowth ash in the Central Highlands were extensively logged pre 1939 – especially the RSF – and so require the recreation of this type structural complexity, but the '39 fires are also in part an anthropogenic disturbance, so also bringing this provision into play.

The argument that “substantial” gap sizes are required for effective regeneration is similarly rejected, as both the Tasmanian (Warra) and Tanjil Bren silvicultural trials established. It is acknowledged that the 10 ha and 150m limit on clearfell gaps (as specified in the system definitions in Annex A), should constrain the sizes of the gaps,

but without a Code definition of 'retained vegetation', including minimum widths of at least 60m, the practical outcome may be little better than at present.

3. The proposal to retain isolated habitat trees is flawed. Habitat trees should be retained along with surrounding trees in connected patches with a minimum size of at least 2 ha, recognising the needs of species such as the Greater Glider and other gliders for which isolated trees are of little value since they do not allow dispersed foraging. To ensure this is the case, the final words "where possible" should be deleted from the end of point 3b in section 4.1.2 (p. 11)
4. The stakeholder consultation provision that is focussed only on apiary sites (point 4 4 section 4.1.2) needs to be accompanied by a further provision encompassing all stakeholders, viz

Ensure that the design of coupes and the proposed harvest and regeneration system in each coupe incorporates feedback from community stakeholders with knowledge of the area.

5. No mention is made of widths of retained forest between coupes, as a commitment to ecological integrity would require. The Code refers simply to a minimum width of 20m for 'retained vegetation', without regard to the ecological value of what comprises the 'retained vegetation'. A minimum width of 60m should be specified.
6. The document includes the following uninterpretable provision in Annex A in the specification of all the proposed systems other than single tree selection

Clearfell and seed tree gaps will not exceed 10 ha in size, multiple harvest areas will be adjacent to variable retention, selective harvest or harvest exclusion areas

The question here is what is considered to be multiple harvest areas. Is it multiple coupes? And if so, how many is 'multiple'? Or is it separate clearfell patches within coupes? RFPG suggests that the constraint on multiple areas be expressed thus:

Clearfell and seed tree gaps will not exceed 10 ha in size, all CFE/RRH/STR coupes will be adjacent to variable retention, selective harvest or harvest exclusion areas and separated with retained vegetation with a minimum width of 60m.

7. The following preamble to variable retention system 1 in Annex A, is ambiguous:

Variable retention system 1 is based on the fundamental principles of VicForests' Regrowth Retention Harvesting (RRH) system, in which the retention of trees is principally in patches that collectively constitute an average of around 20% of basal area within the net coupe area. This system also provides scope for dispersed retention.

Since the "net coupe area" excludes patches, this statement is meaningless. All models should specify a minimum % of gross coupe basal area to be retained for each coupe. The depiction of the systems in Figure 5 suggests this should be: 30% for CFE, 45% for VRS1, 60% for VRS2.

8. The following provision that appears in Annex A in the specification of all the proposed systems apart from single tree selection is hard to understand:

For every 10 ha harvest area, an additional 0.5 ha of vegetation will be retained. Placement will consider the best ecological and safety outcome

It is unclear what this means, given that all the systems require far more than 5% of the gross coupe area to be retained.