



# *Victorian Apiarists' Association Inc.*

FOUNDED 1892

Victoria's Peak Beekeeping Body – "For the Advancement of Apiculture"  
Publishers of *THE AUSTRALIAN BEE JOURNAL* (Monthly) since 1918

STATE PRESIDENT [REDACTED]

STATE SECRETARY: [REDACTED]

RESOURCES: [REDACTED] [REDACTED]

Ms Vivienne Clare,  
Executive Director,  
Department of Environment, Land, Water and Planning

By email [REDACTED]

**Re: Review and Modernisation of Current Victorian Regional Forest Agreements**

## **Submission**

### **1. INTRODUCTION**

1.1 The Victorian Apiarists' Association Inc. (VAA) is Victoria's apiculture (beekeeping) industry peak body, evolving since 1892 to represent the interests of all Victorian apiarists at state and national levels of government and corresponding agencies.

1.2 Statewide, regulated by DELWP, 4,376 active bee farm site and forage range public land licences currently issue, located variously in forested estates and EVCs ranging from the north west mallee through riverine and plains environments to Alpine regions, representing one of the largest public land forest resources user footprints among all commercial stakeholders. The VAA estimates that about 3000 licences currently under issue are collectively located within the five Victorian RFA estates. Attachment 1

1.3 Licensed access to the state's public land native forest floral resources from time to time is the cornerstone supporting the apiculture industry's economic viability and capacity for commercial apiarists to maintain prosperous honey bee colony populations, enabling apiarists to generate so much subsequent public benefit through the delivery of managed honey bee induced fertilisation (pollination) services for the growers of so many of the state's human and animal food crops.

1.4 Throughout the 1990s decade, the VAA was a partner in consultation to the national and state conversations which led to the establishment, in East Gippsland Victoria, of the first Commonwealth/State Regional Forest Agreement (RFA), signed off by Prime Minister Howard. Subsequently, further consultation was engaged during the development and establishment of the four other Victorian RFAs.

1.5 At the signing off of the East Gippsland RFA, the VAA was comfortable about consultation outcomes, delivering what was expected to be enduring and ecologically sustainable floral resource security for the Victorian apiculture industry, equitably balanced with other stakeholder interests, including the Victorian timber industry.

1.6 The integrity of the Victorian RFAs in respect of ecological sustainability in public land forest systems beyond those created under the CAR reserves system, became progressively compromised and eroded through the exertion of market forces pressure on timber harvesting operations economies of scale. The clear fell (seed tree) timber harvest prescriptive model, historically applied in single age ash forest systems, increasingly

became the preferred model in lower elevation mixed species (eucalypt) forest systems, leading to what the VAA considers, in many instances, to have been the single most serious failure of Victorian RFAs to achieve and maintain ecologically sustainable objectives.

1.7 In late 2013, the VAA began formal consultation with VicForests to find a better way forward, recognising that both industries' economies rely substantially on the same native forest resources (maturing eucalypts) one for timber products, the other for long term sequentially occurring floral resources.

1.8 During a recent phase of consultation, and in response to an invitation by VicForests senior management to review and contribute further to ecologically sensitive draft plans that are being developed by VicForests for implementation in lower elevation public land mixed species systems east of the Hume Highway, the VAA, on the 24<sup>th</sup> April 2019, lodged a submission to this effect, for consideration. The Ministries of Environment and Agriculture were simultaneously notified of the lodgement.

1.9 While the case lodged by the VAA responds specifically to VicForests intention to develop and finalise new draft silviculture and high conservation strategies for implementation in native forests east of the Hume Highway, so much of the case is highly relevant to matters raised in Dr Jackson's independent consultation paper (Modernisation of the Victorian Regional Forests Agreements, May 2019). The VAA submits, the lodgement of the VAA case with VicForests, coinciding with the RFA review, creates an opportunity for the Review to evaluate the integrity of the VAA case and its capacity to further inform discussion and contribute to review outcomes.

1.10 Accordingly, the case lodged by the VAA with VicForests on the 24<sup>th</sup> April 2019, and accompanying this submission, forms an integral component of this submission, its content appropriately referenced when responding to three themes identified in the Jackson consultation paper which seeks input from stakeholders.

## **2. INDEPENDENT CONSULTATION PAPER, DR WILLIAM JACKSON, MAY 2019**

### Theme 1: Ecologically sustainable forest management

2.1 The VAA submits, the development by the VAA of a new adaptive silviculture timber harvest strategy for consideration by VicForests, if accepted and implemented, has capacity, in regard to timber harvesting, to deliver ecologically sustainable forest management in perpetuity. The harvesting of one merchantable stem in every three during each more frequent successive harvest rotation, also mimics the natural thinning of forest stems each summer period by uncontrolled fire in elevated native forest systems, pre European settlement.

2.2 On implementation of the strategy, the VAA submits that productivity increases for both the timber and apiculture industries would begin to accrue. Forest structural integrity in degraded systems would be gradually restored. Other forest values in all multiple use systems would progressively benefit, biodiversity increase and habitat retention enhanced.

2.3 In its consideration of the above, the VAA submits that delegated RFA review departmental personnel refer to and evaluate the accompanying, detailed case lodged with VicForests on 24<sup>th</sup> April, 2019. The VAA submits the association remains available for any specialist consultation that may be deemed necessary to clarify or expand any of the case content.

## **3. GOVERNANCE and MANAGEMENT of FORESTS and FOREST INDUSTRIES**

### Theme 2: The long term stability of forests and forest industries

3.1 The VAA submits, the attached detailed case submitted to VicForests for the development and implementation of a new adaptive silviculture strategy has capacity to deliver long term stability for the timber and apiculture industries. The VAA submits the strategy has capacity to also progressively benefit all other forest industries, users of forest resources, the enhancement of all other inherent forest values, and do much to restore the timber industry's social licence.

3.2 The VAA submits that while the strategy has been developed for implementation on licensed bee farm site forage ranges, designed to provide a perpetual flow of timber products over time while maintaining largely uninterrupted melliferous (nectar and pollen producing) resource potential post each harvest, the integrity of the strategy has capacity to be effectively implemented throughout the state's wider mixed species estates.

3.3 With regard to perceived impacts of climate change, the attached case lodged with VicForests at 8.3 and 8.4, page 8, briefly discusses the issue. The VAA submits, implementation of the VAA "1 in 3" rule strategy, where all stems near 40cm diameter at DBHOB at harvest would quickly grow through to become merchantable in the next harvest rotation under the same "1 in 3" strategy, may over time also become an effective carbon sequestration management strategy. If implemented, the VAA submits the strategy could become the focus of long term research to prove capacity.

3.4 At least in the four RFA areas east of the Hume Highway, clearly, historical soil moisture levels for many years have been declining in both foothill and higher elevation forest estates. Symptoms include historically permanent springs becoming less reliable, and more frequent earlier flowering by some eucalypt species. The VAA submits these circumstances may warrant investigative research to substantiate trends.

#### **4. THEME 3: GOVERNANCE and MANAGEMENT of VICTORIA'S FORESTS**

4.1 The VAA agrees that overall, management planning for public forests (including state forests and forested parks and reserves) should aim to deliver ecologically sustainable forest management.

4.2 The VAA is cognisant of weaknesses in forest management oversight and regulation that has been the case, particularly with the harvesting of timber products from the public land estate. The VAA is cognisant of legal proceedings in 2018 which among other issues, dealt with regulatory responsibility.

The VAA submits that governance and management oversight of all public land native forest should be unambiguously vested with the Department of Environment, Land, Water and Planning.

4.3 The VAA submits it supports DELWP commitment to building collaborative partnerships with Victorian traditional owner groups, including prospects for contributing to the management of the state's public lands by DELWP.

4.4 The VAA submits, more than two decades ago, the association worked with Victorian Yorta Yorta elders in mediation before the Native Title Tribunal, assisting process to assess the clan's Mid Murray native title claim which at the time was the first claim to be heard in Australia under the provisions of the new Commonwealth Native Title Act. The VAA submits, a deep resonance of respect pervaded the mediation, the historic indigenous culture of connection with the land reflecting a similar connection and understanding of the natural rhythms of the land that are fundamental for the success of migratory commercial apiculture in Australia.

4.5 The VAA submits, the ultimately successful Yorta Yorta claim paved the way for co-management of the claimed estate, DELWP retaining among other matters, statutory capacity to continue to manage and regulate licensed access to the claimed lands by the apiculture industry. The VAA submits that any future co-management arrangements with traditional owners should maintain statutory DELWP management oversight and regulation for the issue of licensed bee farm sites and forage ranges.

#### **5. BUSH FIRE RISK MITIGATION**

5.1 The VAA submits, the historic use of controlled fire by indigenous Australians as a hunting tool and incidentally as a means for mitigating risks accompanying sporadic outbreaks of uncontrolled bush fire, is well chronicled throughout the vast interior plains country grasslands, woodlands, and riverine environments. The resulting mosaic pattern of previously burnt areas across the landscape is a strategy principal that underpins a planning component of most currently structured departmental fuel reduction programmes

now implemented progressively statewide, confined mainly to public land native forest estates, protection of public assets a principal objective. The small window of opportunity often afforded by seasonal climatic conditions to reduce forest floor fuel by burning often seriously compounds the difficulties departments seriously face striving to achieve satisfactory outcomes for all stakeholders.

5.2 The VAA submits it supports the concept of DELWP working in collaboration with traditional owners, seeking to strategically strengthen planned fuel reduction in all forest systems and EVCs.

5.3 The VAA submits, evidence of traditional owner historical association with planned burning in densely forested higher elevation country is much more obscure. The VAA submits native eucalypt mixed species and ash forest structures at elevation in Victoria mainly evolved through the millenia as a direct consequence of uncontrolled fire ignited by countless multiple lightning strikes during every successive summer period – more so in drought affected seasons, when catastrophic wild fires could burn uncontrolled for months throughout the length and breadth of the Great Dividing Range and foothills until extinguished by natural causes.

5.4 The VAA submits, the net consequence of the uncontrolled, annually occurring fire regime, through the exertion of perpetual thinning on natural regeneration, fashioned forest structures dominated by fewer but larger than today's average stems, continuous canopy cover in the main, and botanically diverse herbaceous understorey. This, anecdotally, was the vista that greeted the first European settlers in Victoria.

## **6. CENTRAL VICTORIAN BOX/IRON BARK FOREST ESTATES**

6.1 For the further information of the RFA Review, the VAA submits the 2014 DEPI box iron bark silviculture manual No.4 establishes a way forward for reafforestation and remedial regeneration in these systems. The VAA submits it is currently engaged in a project jointly funded by the VAA and the Victorian Department of Agriculture which holds in trust industry biosecurity funding contributions, portion of surplus balances which can be allocated for such purposes.

## **7. RFA MONITORING**

7.1 In consultation with the VAA, VicForests have advised the VAA of their intention to review at 5 yearly intervals, newly proposed draft adaptive silviculture strategies, and to monitor and report progress annually. While the VAA expects that VicForests operations feature prominently as a component of the RFA review, the VAA submits it may be useful for the review to become familiar with VicForests internal proposed monitoring and reporting framework.

## **8. CONCLUSION**

8.1 As previously indicated at 1.7 of this submission, the VAA considers the implementation by VicForests of an increasingly preferred clearfell (seed tree) timber harvesting model, in many instances, has led to the single most serious failure of Victorian RFAs to achieve and maintain ecologically sustainable management objectives in public land native forest systems located beyond CAR reservations.

8.2 Accordingly, the VAA submits that timber harvesting prescriptive reform must become a key component in objectives to review and modernise Victorian RFAs.

8.3 As previously indicated, since late 2013, the VAA has been engaged in a respectful and collaborative partnership with VicForests senior management to find a better way forward, the key objective being to develop for implementation an adaptive silviculture prescriptive model with capacity to deliver ecologically sustainable and equitable commercial co-existence for both stakeholders when operating on licensed bee farm site forage ranges.

8.4 In 2018, field trial outcomes of the VAA proposed adaptive silviculture prescription have been encouraging in demonstrating their capacity to deliver perpetual ecologically sustainable objectives and equitable commercial co-existence for both key stakeholders.

8.5 VicForests senior management, responding to the case lodged by the VAA on 24<sup>th</sup> April in part had this to say:

"the extent and quality of the feedback is such that VicForests has decided to spend an extended time reviewing the detail."....."we are also working to provide opportunities for further updates and input in June."

8.6 The VAA submits, the lodgement of the VAA case with VicForests within the RFA review timeline creates a rare opportunity for consultation to be engaged with both key stakeholders. The VAA reaffirms its availability should any further specialised consultation be required beyond what is already formally structured.

Thank you for the opportunity to contribute to the Review.

Yours faithfully,

[REDACTED]  
[REDACTED] VAA Inc.

**ATTACHMENT 1**

**Department of Environment, Land, Water and Planning (DELWP) – bee site licences**

