

“Our Forests at the Crossroads”

Preserve Our Forests, Mirboo North

Response to Federal Government & DELWP re Regional Forest Agreements – June 30th 2019

It is very timely that there is a government review of the Regional Forest Agreements (RFA's) in Victoria. The scene in Australia including Victoria has changed dramatically since they were 1st implemented 20 years ago. These agreements intended to give security to the timber industry while ensuring forestry practices were ecologically sustainable in the 4 states involved – Victoria, Tasmania, W. A. & NSW. However to achieve this, these RFA Agreements removed government logging industries from the full protection of the federal Environment Protection & Biodiversity Conservation Act (EPBC Act) which protect our nationally threatened species and forests. No other industry or activity is exempt from the EPBC in Australia. Instead these 4 state governments have been given the full legal responsibility for environmental protection in their own state logging industries. Not surprisingly, this has not served our forests or flora and fauna species well!

RFA's have failed to achieve these aims over these 20 years both for the forestry industry and for their impact on the environment. The RFA's are consequently no longer fit for purpose. They certainly do not set Australia up well to face the major challenges of the future such as the current species extinction crisis and ongoing climate change. This is truly an industry and environment in crisis, so this Review is very timely.

Preserve Our Forests (POF), Mirboo North believe it is time that all RFA's be ended to better protect our Australian environment, ensure sustainable native timber logging and to prepare and take this country forward into the 21st century.

Major Aspects of Concern:

- 1. RFA's are to be retained for another 20 years outside the EPBC Act as a non-negotiable aspect of this RFA Review process.**

It is of extreme concern that the DELWP Future of the Forests and the federal/state RFA Review Modernisation Process is predicated on maintaining the status quo of retaining the RFA's. The continuation of the RFA's has been made non-negotiable by government. Their environmental protection and conservation will remain devolved to the state

government's legal power and control. Our government forest logging industry will continue to uniquely operate outside federal environment protection for another 20 years. This is no longer acceptable in 2018 where we face major challenges including climate change and a native species extinction crisis.

2. No initial identification of the features, values and systems of a healthy forest to establish key benchmarks as a basis of all future forest development work.

We need to initially recognise and establish clear, community agreed principles which define the state of a healthy forests' system to establish clear benchmarks against which all human activity concerning forests can then be developed. Otherwise we risk damaging, perhaps fatally, the very resource which sustains life and health of life on this planet in many ways. Instead, the whole RFA review and Victorian RFA's Modernisation program has focussed immediately on human usage and management of the forests rather than initially establishing these underpinning healthy forest benchmarks against which to direct and assess any future management approaches.

Forests especially rainforests are rightly known as "the lungs of the planet" given they take in harmful carbon and transpire oxygen. They are "the interface between the vegetation and the atmosphere for the exchange of gases and water". Their absorbed water becomes rain. They also are known as the world's "kidneys", as "they regulate the flow and use of water by intercepting rain and releasing it slowly to the ground where it can either run off into rivers or enter the groundwater" system. They "exchange nutrients between the soil and vegetation, fueling the nutrient and carbon cycle". Trees provide places for millions of organisms to inhabit "niches" both above and below ground which provide necessary habitat for birds and mammals. Forests ensure essential microclimates and "the ecological services of soil formation and nutrient recycling, feeding off each other and creating an intricate web of food chains". They protect against disease and pests crises while providing pollination of most plants essential to our food sources. They also produce major products and resources necessary to maintain healthy human survival.

In fact, our forests drive our ecosystems and have an amazing natural infrastructure to support a healthy world in which all life will survive and flourish. Their capacity to store carbon is becoming even more critical with increased climate change effects. However they are at constant risk from human management issues and resource pressures including logging for timber provision. "The health of our forests worldwide is in their ability to withstand all the multiple pressures from a changing climate and deforestation."

("Trees are much more than the lungs of the world". Roger Leakey, Vice Chairperson of the International Tree Foundation, Mongaboy, Global Agroforestry 2.1.2018)

If we don't ensure all these aspects of our forests are maintained and enhanced, we will irrevocably damage or destroy this essential resource upon which life depends. We do not want to end up "killing the goose that lays the golden egg" by ignoring the forests' essential values, functions and systems in our determined efforts to utilise them for every potential human resource and purpose. This is a high risk possibility for Australia as seen recently in the outcomes of destructive human management of competing resource needs in the Murray Darling River system which destroyed the river in one location causing massive fish kills and degradation of the area's major water supply.

3. Unsustainability of the native timber logging industry into future

The Victorian native forest industry is now in serious decline which is well recognised by both the timber industry and government. The main identified, well documented causes are:

- Increasing effects of worsening climate change, drought and major bushfires across all forest logging areas each year with increasing intensity.
- The 36 year government contract with Nippon Paper under the Forest (Wood Pulp) Agreement 1996 to guarantee supply of 350,000 cubic meters p.a. of native timber until 2030. This is now almost at breaking point in terms of the negative impact upon our forests' sustainability and the rest of the timber industry. No other business in the Victorian timber and pulp industry has legislation binding the state government to provide fixed log volumes for 34 years. All other timber businesses are subject to regular reviews and short term contracts. The Act has been specifically drafted to extinguish all liabilities on the state or that the company would accrue under the Wood Pulp Agreement. Section 32 under Division D of the Act provides for the suspension of both parties' obligations under the ratified agreement, and the company would have no claim for compensation as a result, where either fire damages forest to such an extent that it is impracticable for the State Government to comply with supply commitments. It is of serious concern that this exit clause was not triggered by the 2009 fires earlier. Repealing the Wood Pulp Agreement will have little impact upon Nippon Paper and the employees or economy of the area as a consequence of this action. The Maryvale Mill gets over 80 percent of their inputs from post-consumer waste and plantation pulp. It has a vast diversity of products. Nippon Paper also has a separate timber sales agreement in place

which actually equates to 500,000 cubic metres of native forest that the company is taking annually. This also needs serious consideration and revocation, given the impact of this massive timber supply to the one company upon our forests' diversity, extinction rates. Plantation supply could adequately meet their native log demands in future. It should also be noted that Nippon Paper exported nearly 600,000 tonnes of woodchips from Australia to Japan recently, far exceeding their consumption of native forest logs at the Maryvale pulp mills. It is clear they are currently making a financial decision for greater profit to export our native timber wood from Australia to Japan rather than sending it to Maryvale for paper making in Australia.

- Many smaller mills have closed down or moved to other states/overseas where there is a more guaranteed and sustainable timber supply. They do not have the same guaranteed large supply which is being provided to Nippon Paper and are going under as a consequence in this time of shrinking timber supply. The state government is now being asked to buy out these smaller mills which are creating unnecessary economic loss and distress in some small regional logging towns.
- Bunnings and Officeworks have stated they will only stock FSC guaranteed products from 2010 due to consumer demand. The demand for sustainable timber products is increasing. The state government commercial logging agency Vic Forests has consistently failed to meet this high global standard due to its poor environmental track record.

4. Environmental Concerns

- a) **RFA's treat native forest logging differently and with second rate, nationwide protection compared with any other Australian industry activity in relation to potential impacts on matters of national environmental significance.**

Logging under an RFA does not require federal legal Environment Protection Biodiversity Act 1999 (EPBC Act) approval unlike any other national activity. Instead, the EPBC Act hands all responsibility for native forests to the states if they have RFAs in place. RFA's thus provide the legal mechanism needed by state commercial logging industries to get around overarching federal environmental obligations as required by the EPBC. The logging industries are supported financially and politically by state governments to instead log and convert valuable public forests into future stands of commercially useful tree crops.

The state has consequently developed complex, cumbersome, arrangements to purpose-build legal and management regimes to try and ensure this compliance.

Victoria is currently working through multiple, complex policies and arrangements under its “Future of the Forests” Project to try and revamp the way it manages the RFA’s for greater RFA compliance in order to avoid coming directly under the EPBC. It clearly does not want to give up the state’s control over its own commercial logging industry decisions. The Project is thus being “shoe-horned” to fit within an RFA state logging framework rather than considering the inherent needs of healthy forests for any purpose, as its primary concern. This situation is noted in the 2018 “State of the Forests 2018” Report of the Commissioner for Environmental Sustainability Victoria, which notes Victoria needs to improve its complex, outdated forest management legislation and practices.

As a consequence of RFA’s, state forest management processes are merely accredited by the Commonwealth which does not intervene even when nationally endangered wildlife or environmental values are threatened by RFA logging and the states take no action. This has a high potential to occur in Victoria given the poor history of both DELWP and VicForests with their inadequate to nil surveying of biodiversity and ecological values prior to decisions about which forest areas go onto a TRP. It is the reason why community environmental groups are constantly forced to take matters into their own hands by undertaking the necessary surveying themselves and to then follow up with protection enforcement via legal proceedings against the government. This is clearly documented in “Lawless Logging” produced by GECO, East Gippsland 2017.

b) Climate change with reduced rainfall and increasing temperatures and major bushfires

This has significantly increased temperatures and dry seasons/drought in Victoria especially in East & Central Gippsland and North & North West Victoria. (*Appendix 1. Victorian rainfall and temperature charts, Bureau of Meteorology.*) Consequently we are experiencing major drying of our forests and increasing bushfire susceptibility and intensity. There have been significant and increasing major bushfires in Victoria since the late 1990’s especially the devastating fires of 2009 and 2019 which affected much of Victoria and especially the state government logging forested areas. (*See Appendix 2. Wikipedia – “Major Bushfires in Victoria in the 2000’s” – Note this does not include the recent 2019 fires.*) Central and East Gippsland, North and Western Victoria have been designated drought/dry season areas this year by the Victorian government. The recent 2019 fires were extensive especially in East and Central Gippsland. The fires have led to a significant death of the large trees and understory in many forest areas

including many areas designated for future logging with consequent significant loss of flora and fauna species and their vital habitat.

Any consideration of future logging in Victoria needs to take into account that the timber in these burnt forests will be unavailable to future logging for at least another 60 years under the current regime. However, given increasing temperatures and reducing rainfall in Victoria, it is highly likely these forests will take much longer to regenerate from now on and also may also never fully recover to their former state. This situation is also increasing the environmental and competitive resource pressure on all remaining and fast contracting forest areas after each fire period.

c) **Australia is undergoing an “extinction crisis” nationally and within Victoria.**

- **Australia’s extinction record is poor compared to the rest of the world.**

Efforts at conservation are insufficient to restrain the growing crisis. Currently 511 animal species, 1,356 plant species and 82 distinct “ecological communities” are listed as nationally threatened in Australia. And these numbers are increasing. In particular we are failing to maintain, protect and restore their habitats. There are 82 threatened ecological communities now where many of our species live. We have a huge history of land clearing in Australia. As The Wilderness Society states *“Australia is one of the world’s megadiverse countries and most animals found in Australia are only found in Australia. We have a responsibility to protect our unique animals for their own sake and for future generations. Australia should be a world leader in conservation—we have world-class expertise and the majority of Australians support strong protections for our unique wildlife. Sadly Australia has the worst record in the world for mammal extinction and is number four in the world for other extinctions. Three unique Australian animals went extinct in the last 10 years alone. A recent study found that, unless management improves, Australia stands to lose another 10 birds and 7 mammals by 2038.”*

Already we have lost 60 species since European settlement. 446 fauna species and 1344 flora species are now listed as “threatened” under the EPBC. Few people even realise that the koala is now listed as “critically endangered” in Qld due to loss of habitat. Australia is now one of 11 countries responsible for 80% of the world’s deforestation and is the only developed country included in this list!

- **Victorian biodiversity crisis**

The Commissioner for Environmental Sustainability, Victoria in the 2018 “State of the Forests” Report states there are nearly 250 Victorian fauna species listed as

“threatened” in the FFGA Act 1998, of which 20% are forest dependent species. Further, the Report states that from 2011-2016, 68 forest dwelling species were added to the list of nationally threatened species and forest operations were found to be a primary threat in 10% of forests dwelling flora & fauna species.

As with all the states which have RFA's in place, the Victorian government has failed ~~dismally~~ in ensuring national or even statewide environmental protection. It has not developed Action Statements for 55% of the species and threatening processes listed under its Flora & Fauna Guarantee Act. Some species that have been listed as threatened for more than 20 years but still do not have their legally required Action Statements! Logging thus continues unabated in these species' critical habitats and the government ignores mounting scientific evidence from noted botanists, flora and fauna specialists across Australia that logging is increasing the rates of extinctions in these forests and that logging itself should be identified as a “threatening process”.

In 2013, the Victorian Government amended the Sustainable Forests (Timber) Act 2004 to essentially improve long-term resource security for the timber industry. In the process, the legal link between Action Statements and the Code of Forest Practice was effectively removed, causing Victorian threatened species laws such as the Flora and Fauna Guarantee Act Action Statements to become not directly relevant to timber harvesting and further undermining protection of threatened species and communities.

The situation regarding protection of the federally threatened Greater Glider is but one example of this state government inaction. It is already listed as such under the EPBC but despite being also listed in Victoria as “Vulnerable to Extinction”, it has been waiting 2 +years for the completion of its Action Statement. In fact, most threatened species in Victoria are not protected at all under current state forestry management.

The state government is well aware that when the Greater Glider or indeed any of the vulnerable species waiting for Action Statements are finally completed, there will be a significant negative impact on its current and future logging plans. It is not surprising that these vulnerable species have a known high incidence in the remaining biologically intact native forests which provide their few remaining viable habitats. Not coincidentally, these are also the very same places of high value and high yielding timber for state logging purposes. The government is already under major pressure from the logging industry due to the Leadbeater's' Possum Action

Statement which has prevented logging in many Victorian forestry sites, further reducing timber availability at a time of rapidly dwindling supply.

The Commissioner for Environmental Sustainability in Victoria identified in her Report 2018 that most of the current forest indicators are only fair, with only 1 being listed as good, 3 poor and 3 unknown. This does not give any confidence in the state government's record of forest management to date. Her Report identified fragmentation within our forests leading to genetic and geographic isolation of species populations, specifically due to loss of forest connectivity. This situation she notes is reducing the survival likelihood of many iconic and forest dependent species. She notes there is a need of far greater forest monitoring and data collection.

Victoria has had not one new addition to its permanently reserved conservation pool for over 25 years with the current government having the dubious reputation of being the only Victorian government in more recent years that has not increased our parks and reserves. There are many areas such as in the Strzelecki bioregion which are much depleted in permanently reserved parks and reserves and fall well below federal CAR requirements.

It is of extreme concern that the government fails via VicForests or DELWP to intensively survey or assess each forest area available for logging prior to making its TRP decisions. There is insufficient DELWP or Parks Vic staffing to enable intensive surveying in the Regional Parks or in the logging GMZ areas. Current surveying focuses totally on an individual species by species assessment rather than using a wider landscape approach to determine the relative importance and value of an area's biodiversity and ecological values. Any environmental assessment occurs just prior to logging when responsibility for these forests is purely under VicForests' legal control. This has been found by most environmental groups to be totally inadequate to non-existent. Citizen scientists are then forced to undertake comprehensive assessments prior to any logging to identify the flora, fauna and EVCs' within these coupes, as was the situation in the Mirboo North forests. Logging has already begun in some cases when forest advocacy groups first become aware of the situation. This has unnecessarily created unsatisfactory conflict situations where illegal entry has been required to provide independent and thorough field assessments. These citizen scientist surveys inevitably provide evidence of the presence of threatened species, as seen on numerous, well documented occasions across Victoria. Recently at Icy Creek near Noojee, an illegal blockade occurred due to high community concerns about inadequate government surveying and over-logging of local high biodiversity

Ash Forests. The Tree Geebung and Greater Gliders were 2 threatened species identified very early on in the blockade by the citizen scientists. These had not been identified by DELWP or VicForests prior to logging.

The categorising of native forests under Section 50's or SPZ's has historically been grossly inadequate to ensure their ongoing protection and conservation. Section 50 arrangements have not served high value forests well with a successive history of their removal from native forest conserved land status at the political whim of successive governments and their being sold to private, for profit companies for predominantly softwood plantations. Due to Section 50 arrangements, many high conservation value forests have been lost permanently in areas such as the Cores and Links forests of the Strzelecki's. SPZ's provide no permanent protection and are especially vulnerable to potential government logging in future.

Some Regional Parks such as the Mirboo Regional Park have not yet been formally gazetted. Thus Regional Park was recommended as a regional park in the Land Conservation Council's South Gippsland District 2 Final Recommendation's (LCC 1982.) Although not reserved, it is managed in accordance with these recommendations as they were accepted by the Victorian government. Two blocks of the park are Reserved Forest (under the Forests Act) and the rest is classified as Uncommitted Crown Land. This does not provide any guarantee of permanent conservation of this total area.

There has been no further increase to Victoria's National Park land areas for over 25 years despite ongoing loss and removal of our significant forests. The current government is the only recent government to make no increase to Victoria's National Park system since coming into office. This needs urgent consideration and rectification.

It is of serious concern that there is much of Victoria with no independent environmental advocacy or scrutiny to protect it and to ensure thorough, qualified biodiversity surveying of planned logging sites takes place. Biodiversity surveying if any is left too often solely to VicForests with no external scrutiny and with undoubtedly poor species outcomes given the volume of evidence of this happening when citizen scientists undertake independent surveying of forests to be logged.

- **Mirboo North's Biodiversity Crisis**

Mirboo North sits in the Strzelecki Ranges bioregion and the South Gippsland Shire. It has suffered historic massive clearing for agriculture and also extensive clearing of its dense, native forests, even up till the late 1990's to convert these into monoculture plantations because of its close proximity to the Nippon Paper

Company Mill in Maryvale. Less than 2% of the Strzelecki Ranges bioregion forests are currently conserved under the federal CAR (comprehensive, adequate and representative) system compared with the 15% guideline required, making it the most depleted bioregion in the state. Even the recently reserved nearby Bratulaung Park further to the east is only of SPZ status and thus is perpetually tied to the logging industry and with no permanent conservation status. It does not increase the Strzelecki bioregion CAR percentage of conserved reserves.

Victoria especially fails to protect its Ecological Vegetation Classes where its flora and fauna species reside and which provide their critical habitat. This is especially seen in the Mirboo North forests which highlight the importance of this forest to the regional EVC's. Much of the area to be logged consists of Endangered Damp Forests, Vulnerable Lowland Forest and Depleted Wet Forests. VEAC recommended in 2017 that any Damp Forests and Wet Forest be protected. These protections have failed to be enacted by the government since that time and hence this forest is extremely vulnerable. These 3 EVC's are under-represented in the Strzelecki Ranges bioregion (VEAC 2017). The Victorian Environment Assessment Council (VEAC) identified 79 species here in 2017 which were described as "forest dependent." It identified that "South Gippsland is an area that has some of the largest blocks of state land that makes the highest relative contribution to forest bio-conservation". VEAC research into the conservation values of state forests in 4 regional forest agreement areas including Gippsland took place from 2014 – 2017. State forests in South Gippsland were singled out as being very likely to comprise land in the highest category of contribution to forest biodiversity conservation and as being more likely to provide habitat for forest dependent species.

The "State of the Forests" Report 2018 identified fragmentation within Victorian forests leading to genetic and geographic isolation of species populations, specifically due to loss of forest connectivity. The Report notes this fragmentation and loss of connectivity is reducing the survival likelihood of many iconic and forest dependent species. Community surveying in the forests here over past 18 months has identified consistently high numbers of greater gliders (~~Nes~~) which are a federally protected threatened species. The Commissioner notes there is a need of far greater forest monitoring and data collection. This is a key issue for the Mirboo North forests which are now extremely isolated, small forest "islands" in a vast desert of cleared agricultural land and plantation removal of existing forests and conversion to monoculture development. The 250 ha provided under the Mirboo North SPZ is very fragile already and will be at even higher risk when the surrounding forest is logged.

All biodiversity surveying of the 3 areas to be logged has been undertaken solely by the local Mirboo North community via citizen scientists when it became clear that no recent or intensive government surveying had or would be done until near the time of the planned logging. Fortunately, the community has yielded very highly qualified and experienced people from within the local community and nearby environmental groups who have voluntarily spent long hours day and night identifying the forests' flora, fauna and EVC areas, as well as studying the history and profile of the bioregion.

These highly endangered and biologically critical areas of forests were to have been logged this year but due to intensive, united community rejection of all logging of its forests for over nearly 2 years, the Minister for the Environment has granted a temporary reprieve. There is no government guarantee it will not be logged in future or that any action will be taken to protect its EVC's and endangered species in recognition of its major significance and contribution to the local area's biodiversity.

d) State government Conflict of Interest in Safeguarding Environmental Protection

There is an inherent conflict of interest for the Victorian government given it runs its own commercial logging industry via VicForests. This agency, sitting comfortably at "arms length" from state government, implements threatened species regulations at each logging site without any requirement for government approval. It seems the state government is more concerned about their pecuniary and political interests than meeting their legal, environmental obligations. In any case, there is a continuing conflict between environmental and monetary or political imperatives which inevitably provide little environmental protection as an outcome.

In any other situation, an agency would have to declare a "Conflict of Interest" and remove itself from such discussion and certainly any decision making to ensure complete impartiality is not only achieved but is seen to be carried out.

Once the government endorses its Timber Release Plans to allow logging in designated areas, the responsibility and ownership of the timber within the approved logging areas passes from the government as the agent of the Crown to VicForests. If a Minister ever recommends there be a reduction of any of the timber resources allocated to VicForests under its TRPs, the Minister must consult the state Treasurer before any decision to reduce such timber is allowed. The state's

pecuniary interest is therefore the final decider in such matters and not the protection of the environment.

e) RFA's ecological targets are now well out of date

The RFA standards for the protection of ecosystems are now falling below international and national benchmarks. The CAR definition has been superseded, both globally and nationally, by new standards and targets. Part of the RFA's JANIS criteria are now inconsistent with the National Reserve System Strategy adopted by all Australian Governments in 2009, and the Convention on Biological Diversity (CBD) Aichi Biodiversity Targets (specifically Target 11), adopted in 2010. It is no longer possible to compare the current level of protection of EVC and old-growth forest values in each RFA region with the level of protection in place when the RFAs were signed, as so much has changed.

f) Water Protection Concerns

It is very concerning that most RFA logging areas feed into state and regional rivers and water catchments which are then impacted negatively, with timber constantly being removed around them. This not only destabilises the soil causing potential siltation but the replanting of trees into future plantations on these sites demands extremely high amounts of water to support new trees early development. This creates a situation of reduced water available to the catchment at a time of increasing climate change and drying of forests and reducing water supply.

It is important to keep uppermost that forests "are part of the natural infrastructure of any country and are essential to the water cycle" – *Food & Agriculture Organisation, UN*. FAO regard forests as optimal land cover for catchments. They also help mitigate against floods, droughts and help to stop desalination and "desertification".

Closer to home, Chris Taylor, David Blair, Heather Keith and David Lindenmayer published a Report "Resource Conflict Across Melbourne's Largest Domestic Water Supply Catchment" in 2018 that showed that by 2050 we face a loss of water yield equivalent to the water use of 600,000 people in the Thompson catchment if logging continues at the current rate.

Mirboo North shares the concern of the Thompson catchment, as all its local domestic water is supplied solely from the little Morwell River with the local water treatment plant situated just out of town on the Little Morwell River and

surrounded by our local and nearby forests as its catchment area. Logging in these small forests will reduce catchment land forest cover.

g) Lack of Independent Scrutiny

There is no independent scrutiny permitted about what is occurring once logging commences, as the public are denied any legal right to be involved from then on. It is clear logging has continued even when threatened species such as Greater Gliders, old growth forest areas or significant habitat trees hollows have been found during logging. The rights of the public to participate in and scrutinise decisions about logging operations are also very limited. Community environment groups have consequently been forced to act illegally to identify these breaches of environmental protection and risk legal action for doing so.

The role of the Office of the Conservation Regulator will not satisfactorily address this concern, as it still remains firmly within the senior administration area of DELWP. While the role of the Independent Panel will help to monitor the government's actions, all final decisions will still lie within government. This model has failed to provide satisfactory independent scrutiny in other government areas e.g. police matters.

The need of an independent authority for the hearing of complaints or grievances about forest management, logging activities and environmental concerns has still not been met adequately to ensure complete lack of bias in any decision making.

h) Insufficient Recognition of and Priority Given to Non- Logging Forest Values

RFA's have stated bias towards ensuring the continuation of a healthy forest logging industry. They do not adequately recognise, include or account for other key values such as water, amenity, ecosystem services, community health and wellbeing, recreation and tourism that are now contributing significant income, health and value to our regional areas and to the state.

The 2018 "State of the Environment Report" also stresses the wide diversity of purpose and value of these forests – "forests maintain our water quality, purify the air, store carbon, stabilise and nourish the soil, assist agriculture, support regional economies." The Report also recommends better understanding of Victoria's carbon cycle and storage needs via its forests which needs to be increased for our future. It identifies that there are several major threats facing our forests in future, namely

high population increase with higher demand for increased water and timber, climate change and more severe fires.

The “Report of the Public Inquiry into VicForests Operations 2017” highlighted the unsustainable future of its logging and stated “there is a need to consider other industries in state forests which meet environmental obligations and develop jobs and skills in the community”.

In South Gippsland Shire where Mirboo North sits, agriculture and tourism far outweigh the economic value of the timber industry, much of which relies on plantation and not native timber anyway for its output. The Shire’s tourism income has risen from \$30m in 2012 to over \$100m last year. The forest planned for logging provides a stunning visual entry to the north of our town and is clearly visible from residential areas. We have large and growing accommodation places and eateries, a brewery and local retail sites which are highly dependent on the tourism trade.

The value of timber proposed to be obtained by VicForests from the Mirboo North forests was \$1.2m using a highly inflated multiplier, whereas recent extensive community surveying has identified that tourism brings in an estimated total of \$19.1m to the town and immediate area. The survey applied the Shire’s economic modelling via Remplan to determine that a minimum of \$1.8m would be lost to Mirboo North and 13 jobs would be lost if logging were to occur. Its tourism industry is heavily dependent on its attractive forested environment. These losses are serious for a small rural town, especially where many of these jobs are held by young people for whom there is limited employment in the area and businesses are often run by local families. Tourism is also a key area of planned, future development for this town and local area. It should be noted that Mirboo North is not and has never been a logging town.

Community surveying in the town of 362 local people and 169 visitors identified that “wellbeing” was the aspect of their local forests which had most importance to all. Other important value areas identified in the survey were biodiversity conservation and wider environmental concerns such as climate change/carbon capture, the provision of people’s passive and active recreation activities and the impact upon the quality of the visual amenity and general town amenity.

The Nous Group found that for an investment of just \$45 million, Victoria’s proposed Great Forest National Park would draw almost 380,000 extra visitors a year to the Central Highlands, add \$71 million annually to the local economy and generate 750 jobs with a little private investment. Yet it has been rejected by the

state government in favour of propping up their unsustainable, environmentally damaging logging.

Recommendations:

- POF believe it is time all RFA's be ended to better protect our Australian environment and to prepare and take this country forward into the 21st century.
- All state government native forest logging must come under the full force and approval of federal environmental laws via the EPBC Act, as with all other industries and activities in Australia. State accreditation and compliance arrangements for state logging which currently bypass federal responsibility must cease. The protection of Australia's forest biodiversity and threatened species will be of a higher standard and more species would be protected if they were regulated by the federal EPBC Act rather than left to the states under any the current RFA compliance arrangements.
- Given the serious and increasing impact of external natural events such as massive bushfires, climate change and a growing extinction crisis in our state forests, it is now time for this government and Parliament to act in the interests of the environment and our competitive Victorian timber industry economy which is fast disappearing as a consequence of this legislation to begin a transition away from the Forests (Wood Pulp) Agreement 1996 contract with Nippon Paper by repealing this Agreement. The Nippon Paper Group has sufficient plantation supply in Australia and can easily redirect those resources to the Maryvale pulp mill.
- The government immediately undertake a plan to substantially increase the amount of forest land legally placed under permanent conservation via National Parks. Areas deemed critical for conservation must include forests where there is major under-representation of the local biodiversity currently in conserved areas or where there is an identified high risk of loss of significant species and/or EVC areas in a particular region or which contributes significantly to the state or nation's biodiversity. The Mirboo North forests are clearly identified as having a high conservation status and are one such area which should urgently be given permanent protection in a conservation reserve or National Park.
- The government immediately release the Action Statement for the Greater Glider in Victoria which has been waiting 2 years for its final completion

- All threatened species currently waiting for Action Statements under the FFGA Victoria must be fast-tracked to be completed by 2025 to prevent further extinctions and critically endangered species in Victoria.
- The government needs to urgently develop new “High Conservation Values” criteria based on a wider and less rigid definition than currently exists. This HCV criteria needs to be restrictive and more inclusive and reflective of the number of currently unrecognised high risk species and EVC areas. There needs to be an extension of these criteria to provide the same level of protection to other species which make a significant contribution to biodiversity. The current definition focuses purely on large rainforest eucalypts. It does not include many other factors which would meet such a criteria including the following:
 - The degree and amount of fragmentation within local forests of the area creating high risk to local/regional biodiversity
 - Extent and effect of lack of connectivity between forests so that species become very vulnerable to negative genome impacts and poor survival rates/extinction
 - The existence of threatened species – noting which species, population numbers and density, history, local circumstances e.g. poorer soils causing less incidence of high risk species but which show high risk of extinction, past logging or bushfire activity which has impacted significantly on a high risk conservation area
 - The definition of an “old” or habitat tree being widened to include smaller size, very old significant important trees in localities which do not have the soils or local conditions to grow into the size of old rainforest eucalypts and which may be significant of non-eucalypt key species under threat in an area
 - Consideration of the status of the EVC’s and the species they contain within a specific location with high status being given to endangered and vulnerable forest EVC’s.
 - There should be consideration of developing a cluster of factors which should be considered when determining HCV status classification to include 1 or more of the above factors. A significant number of factors being identified in an area should establish a “red flag” and a need for permanent conservation or at least HCV status. Many species constitute a unique and significant contribution to the biodiversity of the local area and/or region and/or state and/or to Australia e.g. the South Gippsland Koala which has the only full genome of the original

Victorian koala making it historically important to Victoria and less susceptible to climate change, future diseases etc.

- The government needs to require that any decision to log a native timber forest is based upon prior intensive surveying of people highly skilled in assessing the full biodiversity and ecological values of each area to be logged. This should include a landscape approach and not rely purely on individual species identification. Local communities should be involved in such assessments to share expert local knowledge and experience and to be part of the final completed survey analysis.
- There needs to be greater consideration of the need to protect federally threatened species such as the Greater Glider. In East Gippsland these are now given some protection from logging via buffers if there are 11+ gliders within a 1km area. However there needs to be a broader way of determining whether this is a significant population which needs protection across the entire state, as the degree of glider density for each location will depend on the type of forest and EVC's. Gliders can live more densely in a rainforest compared with a more open forest or where there has been previous logging or other disturbance such as fires or fragmentation and also loss of connectivity. They can still be under the exact same significant threat given their numbers and in a particular area. The number and km area size needs to be adjusted according to each geographic location – "one size does not fit all" in making such decisions for gliders across the state. These decisions need to be tailored to and realistic for each area under consideration. The history and background of these species may well be an important factor in this decision e.g. high risk of not surviving in fragmented areas, how they came to be present in these areas etc.
- Research is highly recommended into developing alternatives to native timber for fibre needs of paper production, building and other traditional timber based products etc with aim of transitioning to sustainable, high value competitive options for Australia both at home and in the overseas market
- There need to be far greater opportunities provided by government to enable indigenous community participation in all aspects and at all levels of our native forests management. Aboriginal people are the original and traditional custodians of this land and as such have the highest respect for country which is of major cultural significance to their lives and future. They need government recognition of their right to practice traditional activities

within all our forest areas which should always be respected and enabled legally by government.

- There needs to be a substantial boost to positions within DELWP and Parks Vic offices across. Need for better conservation and protection roles as well as current protection of critically threatened species which mainly directs their work currently due to inadequate staffing numbers. Unable to do necessary environmental surveying of forest areas including for logging purposes or for preservation and conservation requirements. Staffing is also needed for enforcement of compliance with aspects such as preventing illegal logging and firewood
- collection, off road track making by vehicles, litter and damage to forest, lighting of fires, ensuring proper enforcement of camping requirements and laws etc.

Preserve our Forests Steering Committee

References

- *Strzelecki Ranges Biodiversity Study” Biosis 2010*
- Wellbeing Survey Forests industry Report 2018
- Aus Bureau of meteorology – Climate trends and weather charts

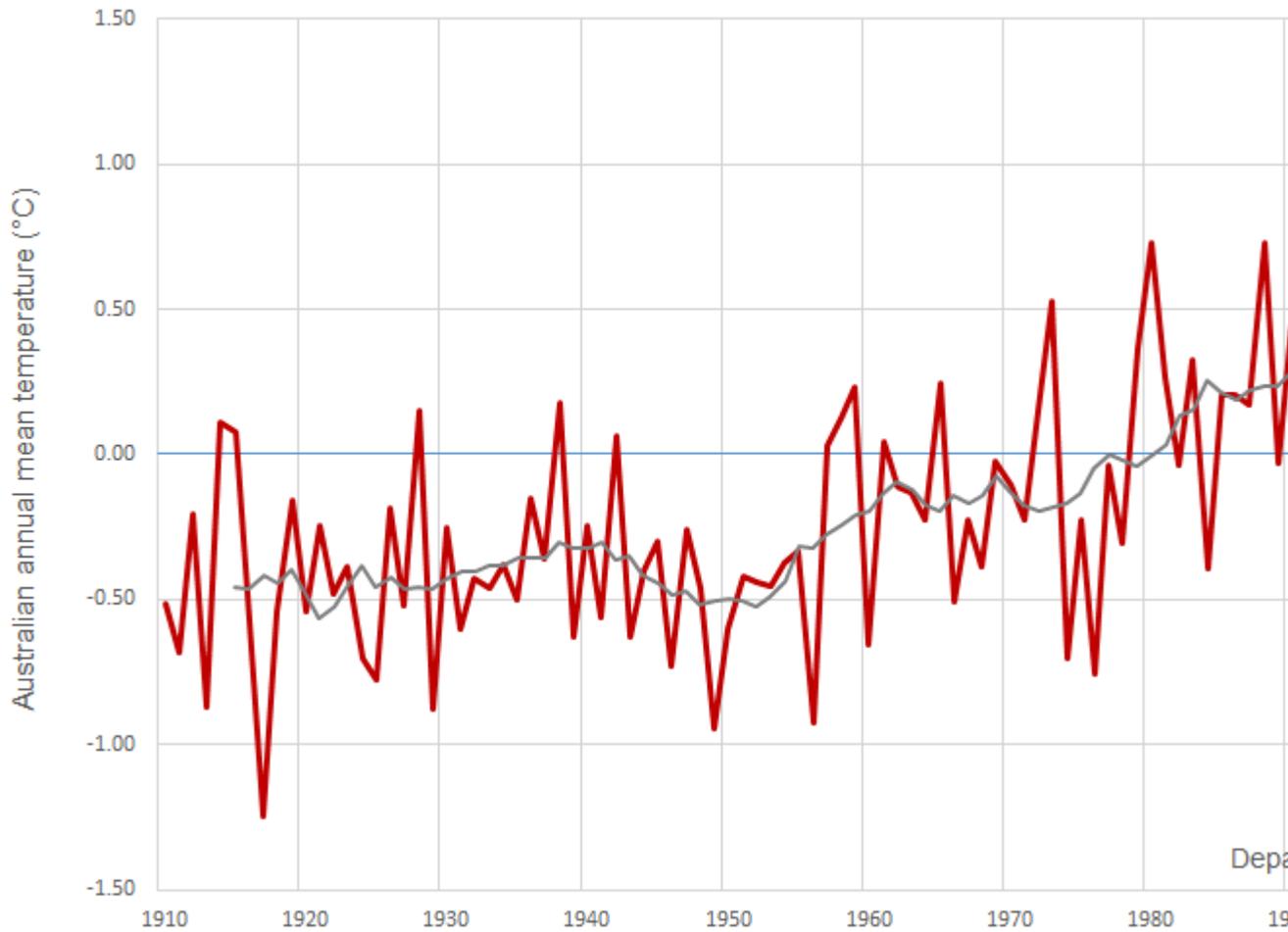
Appendices

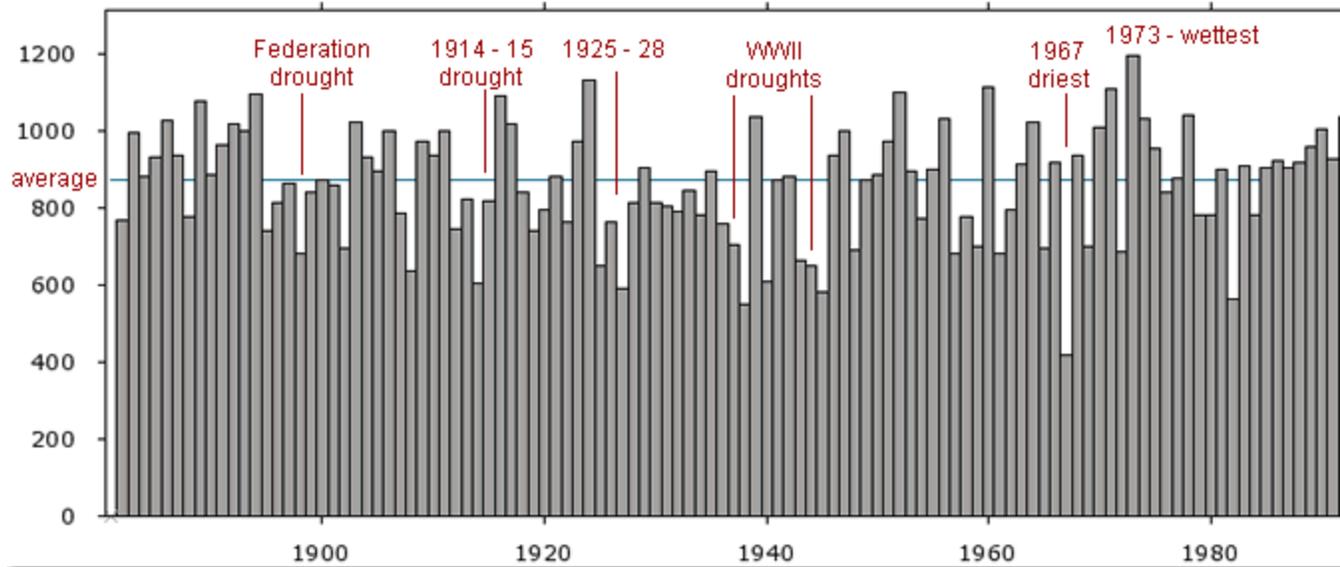
Appendix 1.

Australian Bureau of Meteorology

- The ACORN-SAT dataset reaffirms climate trends identified previously by the Bureau.
- Data show that Australia has warmed by over one degree since 1910. The warming has occurred mostly since 1950.

- The frequency of daily temperature extremes has also changed since 1910. The number of weather stations recording very warm night-time temperatures and the frequency with which these occur has increased since the mid-1970s. The rate of very hot daytime temperatures has been increasing since the 1990s.
- The warming in the ACORN-SAT dataset is very similar to that shown in international analyses of Australian temperature data and very closely matches satellite data and warming of sea surface temperatures around Australia. This agreement provides added confidence for decision makers, and reinforces our understanding of the changing climate.





Australian Rainfall Information Bureau of Meteorology

Appendix 2.

Wikipedia – Major Bushfires in Victoria in the 2000's

(Showing 2006-7 fires in blue)

