

14 June, 2019

Warrnambool Field Naturalists Club



WEST VICTORIAN REGIONAL FOREST AGREEMENT SUBMISSION

The West Victorian Regional Forest Agreement is environmentally damaging, unnecessary, and should not be renewed for the west of Victoria.

SOME OF THE KEY REASONS WHY AN RFA IS NOT NEEDED FOR THE WEST:

1) There is very little native forestry industry left in the west, and it is not profitable and financially reckless.

According to the 2017–2018 VicForests Annual Report:

- Total revenue from Western forests in 2017–2018 was \$700,000 (less than \$1 million).
- State funding to VicForests managed western “Community Forestry” in 2017–2018 was \$678,000 (that’s a surplus of \$22,000 per annum).
- Total volume of timber generated from native forests was 21,000 cubic metres, or 1.5 per cent of total state production. It was for mostly low grade uses such as firewood.
- According to VicForest’s own consultants, Deloitte – Access Economics 2017 report, “... the volume of native forest harvested across western Victoria is minimal.”
- There is no longer export of woodchips or other products from native forests in western Victoria, which was one of the key reasons the RFA was set up in the first place.
- South-west Victoria contains one of the largest plantation sectors in Australia, but this is not mentioned in the current RFA. Including plantations in the new RFA, which is essentially a type of farming, will give special treatment to one type of farming enterprise over another.

2) The Western RFA is an obsolete regulatory relic and should not be renewed.

- In 2010 the Independent Review on Progress with Implementation of the Victorian Regional Forest Agreements Final Report recommended that the Western RFA be cancelled.
- The western forests are not included in most recent allocation orders for VicForests, making the legal status of logging uncertain.
 - There is a growing recreation need to deal with Melbourne’s population growth. Many of these are popular recreation areas, such as the famous Beeripmo Walk at Mount Cole.
 - There is no mention of climate change or carbon reduction value of forests in any of the RFAs.
- Most of the commitments for pest plant and animal control in the RFA have not been delivered.

3) The Western RFA is ecologically damaging and delivered very little protection for native forests as promised.

- The RFA has not delivered a comprehensive, adequate or representative reserve protected area system in the west of the state, as it promised it would. The ecological criteria used in the RFA are now out of date and inconsistent with various international and national agreements and strategies that have been signed by the Australian Government.
 - Significant new national parks in the region, such as the Otways and Cobbobbonee near Portland, were instead the result of community campaigns achieved in spite of the RFA, not because of it.

- There has been little native forest logging in Wombat forest in central Victoria for over a decade.
- There is no evidence that RFA has led to improved pest plant and animal control or treatment in western forests, even though this is promised.

4) There are still significant gaps in the protected area and reserve system in western Victoria.

- There is now an active Victorian Environmental Assessment Council (VEAC) investigation in the central west, looking at the future of Wombat, Pyrenees, Wellsford (not in the RFA area) and Mount Cole state forests to fill well-recognised gaps in the representativeness of Victoria's reserve system.
- VEAC has also recommended on two occasions that areas be protected to fill significant gaps in the reserve system in the south-west (between the Grampians and the South Australian border). These recommendations were accepted by the Victorian Government and are consistent with Andrews Government Biodiversity Strategy.

5) The west is an area rich in threatened species and endangered habitats.

- In the Portland and Horsham Forest Management Areas (FMAs) alone there are at least 52 threatened vascular plant species, and 81 threatened fauna species that have been recorded in or close to state forests.
 - South-eastern red-tailed black-cockatoo, for example, is found on some of the most cleared areas of the state in south-west Victoria. Remaining public land vegetation, particularly in stringybark forests, provide critical food resources as well as nesting habitats for the bird. Many of these areas are either State Forests or other public land blocks with minimal legislative protections in place.
 - The south-eastern red-tailed black-cockatoo is a nationally endangered species, listed under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). It is vulnerable to climate change and threatening processes currently allowable in State Forests, including resource extraction and inappropriate fire regimes, which can impact on the availability of critical food resources and nesting hollows for the bird.
 - The Wombat forest is a large and beautiful forest with a diverse range of fauna and flora with over 360 indigenous plant and 180 native animal species. The Wombat is home to two plant species – Wombat bossiaea and Wombat bush-pea – which occur nowhere else. Fifteen threatened fauna species have been recorded in the Wombat, including spot tail quoll, growling grass frog, masked owl, powerful owls, brush-tail phascogale and greater gliders
 - Few of these species are listed or mentioned in the 2000 version of the RFA (other than some of the orchids) and few have relevant prescriptions in forestry codes or forest management plans.
 - Much emphasis is placed on old growth in the RFA's and forest management systems. This is particularly an issue in the east of the state; however, this is less relevant in the west of the state for areas outside the formal reserve system.
 - Due to the cleared and fragmented nature of remnant native vegetation in the west of the state any remnant vegetation has high conservation value. DELWP modelling, while it remains disputed by many conservationists, shows that approximately 350,000 hectares of old growth forest may currently exist in Victoria, almost all in state forests and protected areas east of the Hume Highway. Around 300,000 hectares of old growth has been lost in the last two decades. If old growth exists in the west it should be protected but in the west the focus in many depleted vegetation types should be on individual large old trees, as these are often rare and not part of larger old growth patches.

- There has been insufficient survey effort to have good knowledge of what species are present in the area or their range and population. State flora and fauna databases do not provide adequate data about most areas that would be covered by the Western RFA.

Across western Victorian forests, 70 per cent of the area targeted for logging contains native vegetation types that are either endangered (19 per cent) vulnerable (11 per cent) or depleted (40 per cent).

In the Horsham Forest Management Area, 54 per cent of the vegetation proposed for logging is endangered.

More than 20 threatened native animals and 14 threatened native plants were found in or closely adjacent to a third of all proposed logging areas.

Proposed logging coupes in the north-west of the RFA contain forest types where most trees do not grow large enough for sawn timber or fence posts or river red gums around wetlands where they provide crucial habitat for those species dependent on larger trees.

FUTURE OPTIONS

- The Western RFA should be cancelled, allowing national environmental laws to apply to protect threatened species and habitats.
- VicForests, the Victorian Government's commercial native forestry business, should be removed from the west of the state.
- The national parks and reserve system on public land should be completed in the west to international benchmarks, following an appropriate assessment and consultation process.
- If the small amount of commercial native forest logging continues, it should be managed by the government environment department (as is current domestic firewood).
- The timber industry should be based entirely on plantations established on previously cleared private land.
- Pricing and cost of access to public owned native forest should be reviewed so as not to disadvantage private growers of woodlots.
- Western forest should be assessed for economically and socially for all uses and values including water, carbon storage, recreation and biodiversity.
- Forest management systems need to be developed specifically for the habitats and species of the west and impacts of climate change (more fragmented, drier climates, smaller vegetation patches, many slow-growing species, large numbers of endangered species and habitat types)
- Traditional Owners land rights, ownership and management should be recognised and encouraged.

Yours sincerely

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