

Submission on Victorian Regional Forest Agreements

29/6/2019

from [REDACTED] Victorian National Parks Association member, South-West Gippsland (Fish Creek group) Landcare member

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I whole-heartedly agree with the detailed submission made by the VNPA and feel strongly that the many points listed below should be taken into consideration in the review of the Victorian Regional Forest Agreements.

There should be no renewal of Regional Forest Agreements.

Regional Forest Agreements provide special treatment to the native forest industry and allow for the logging of public native forests. Logging that occurs under these agreements does not require approval under national environmental laws, unlike most other industries or activities.

None of the Victorian RFAs have met their objectives. Numbers of forest-dependent species listed as threatened continue to rise, and forest health is declining and will only get worse under climate change. Even the native forest industry is stagnating and in decline as their main resource runs out or is reduced through landscape-scale fire.

The so-called 'mandatory' five-yearly reviews do not even cover contemporary issues and are largely a tick a box. They are retrospective exercises that cover the period of implementation of the RFAs between 1 July 2009 and 30 June 2014, well in the past.

Some reasons why Regional Forest Agreements have failed

- **Obsolete and out of date** – Many of the RFAs standards for the protection of ecosystems fall below international and national benchmarks. The agreements do not even mention climate change and its potential impacts.
- **Threatened species and ecosystems** – In 2015, mountain ash forest, one of the key target species for logging, was listed as critically endangered on the International Union for the Conservation of Nature (IUCN) Red List of Ecosystems. The Leadbeater's possum has been up-listed to critically endangered, and the greater glider added to federal and state lists as vulnerable to extinction. While the RFAs have been in effect in East Gippsland, populations of the greater glider have declined by 50 per cent in that region.
- **Ignore fire impacts** – RFAs ignore the successive or cumulative impact of bushfire, even though there have been extensive fires in the last 10 years.

- **Ignore other forest values** – They do not recognise, include or account for non-wood forest values (such as water, ecosystem services, recreation and tourism) that are contributing significant sums to the state’s economy, and could contribute further.
- **Ignores their own previous reviews** – Recommendations relating to improved threatened species outcomes, from the previous RFA five-yearly review in 2009, have still not been complied with.
- **Unjustified special treatment for native forest logging** – Most industries have to follow the law, yet RFAs ‘turn off’ national environmental laws. The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is the main piece of federal environmental legislation, yet the *Regional Forest Agreements Act 2002* provides that RFAs, and by extension the native forest industry, are exempt from the EPBC Act.
- **Stifles innovation** – The method of harvesting native forest, clear fell logging, has not changed significantly in 30 years and has a dramatic impact on the native habitats and drinking water production. The amount of saw timber used in construction has dropped dramatically and supply is shaky, to the point that the Victorian Government had to buy out the main native hardwood sawmill in 2017.

Regulatory relic – the Western Regional Forest Agreement

Many of us think that the Western Victoria Regional Forest Agreement was phased out after the historic decision by the Bracks Government to create the Great Otway National Park in 2005, which largely ended broad-scale commercial logging in the area and are surprised to know that the agreement still exists and is still part of the current review.

Even the last independent review in 2010 recommended that the Western RFA be cancelled, but as recently as mid-2017, revised ecologically-damaging logging plans have been released for targeted logging of woodlands right across the west. This includes around the Grampians, Wombat forest near Daylesford and Mt Cole west of Ballarat. Key features of this plan include:

- Will target around 60 areas of state forest and take place in areas known to harbour more than 20 threatened native animals and 14 threatened native plants
- Across western Victorian forests, 70% of the area targeted for logging contains native vegetation types that are either endangered (19%) vulnerable (11%) or depleted (40%). In the Horsham Forest Management Area 54% of the vegetation is endangered.
- Threatened species have been found either within or near 33% of planned logging coupes, even higher in some regions.

Western Forests and Woodlands at risk

The five Victorian RFAs must be allowed to expire, and not be extended or rolled over.

The looming expiration of the RFAs provides a much needed opportunity to put in place improved, modern and transparent arrangements for management of Victoria’s publicly owned native state forests – based on current science, and on community views about how our state forests should be valued, used and managed.

Native forest logging is strongly contested, based on conflicting and out of date information and concepts. In many ways, an appropriately constituted judicial and expert review would be a fairer process, if a review is undertaken at all.

Minimum steps forward

This overdue five-yearly review should recommend the RFAs be abandoned, and at a minimum end the special treatment this industry enjoys under the RFAs by:

- end the regulatory relic which is the Western Regional Forest Agreement and comprehensively review proposed logging plans;
- discontinuing the industry's exemption from national environment laws in all RFAs;
- accounting for other forest-dependent industries—such as conservation recreation, tourism, agriculture, water, and carbon – in any arrangement or agreements going forward;
- Strengthen management prescriptions for threatened species, climate change impacts, and fire;
- Make substantial additions to the formal reserve system.

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