

SUBMISSION IN RELATION TO VICTORIAN REGIONAL FOREST AGREEMENTS
July 7, 2019
By Soudan Holdings Pty Ltd.

This submission is made by Soudan Holdings Pty Ltd (Soudan). Soudan has owned and operated a farming enterprise in the Otway region for 25 years on land that is bordered by the Otway National Park. The author of this submission, [REDACTED], is the [REDACTED] of Soudan. He holds an [REDACTED]

[REDACTED] has an extensive history of involvement in forest management in the Otways. Specifically, he was actively involved in the campaign by OREN to end clear-fell logging in the Otways and, in this capacity, [REDACTED] as a result, he developed a good understanding of the RFA process.

GENERAL OBSERVATIONS ON THE EFFECTIVENESS OF THE CURRENT RFA'S

We do not consider that the Victorian RFA's have achieved the three defined objectives:

1. To identify a Comprehensive, Adequate and Representative (CAR) reserve system and provide for the conservation of those areas.
2. To provide for the ecologically sustainable management and use of forests in each RFA region.
3. To provide for the long-term stability of forests and forest industries.

At the time the RFA's were enacted in 2000, it was clear that the whole process was heavily biased towards logging and was paying lip service to other values such as biodiversity, water, tourism. In this context:

- Much of the 'logic' was driven by 'pseudo-science' rather than independent, rigorous, scientific assessments
- There was an overwhelming emphasis on clear-felling and woodchip production – an activity that caused immense short term and long term harm to our native forests for a limited economic benefit that accrued to a small number of private interests (such as Midway)
- There was an appalling lack of independence shown by the DSE – we observed consistent hostility to any opposition to logging and a failure on the part of DSE officers to understand that they were accountable to the wider community (that owned the forests), not to the forest industry
- The forest industry showed a consistent willingness to break the rules (e.g. by damaging sawlogs so that they could be classified as 'residual' logs, and by logging in buffer zones)

As a result of the above, the RFA's have completely failed to deliver on the key objective: "to provide for the ecologically sustainable management and use of forests in each RFA region." We disagree with Dr Jackson's conclusion that "Victoria has applied the principles of ecologically sustainable forest management to public forests." It clearly has not. The last 20 years have seen the devastation of large areas of forest across most of the RFA's, with clear-felling leading to a significant loss of biodiversity. (In 2018, half of the total native forest log harvest in Victoria was pulp logs for woodchip exports and domestic paper production.)

FUNDAMENTAL CHANGES NOW NEEDED IN UNDERLYING ASSUMPTIONS

There is now a very widespread and growing understanding of the risks to humanity associated with climate change, loss of biodiversity, and loss of access to water. These risks were present in 2000, and should have better informed the RFA process, but they did not. Now, it is imperative that these risks, and their implications for native forest management, be recognized. Specifically:

- The importance of the native forest estate in relation to carbon capture must be independently quantified
- The impact on biodiversity of clear-fell logging on an 80-year rotation needs to be quantified (it takes 250 years for a eucalypt forest to reach full bio-diversity). Bio-diversity here includes consideration of both flora and fauna
- The potential to use our native forests for water harvesting rather than woodchips must be considered. Given the clear research-based evidence that clear felling reduces water yields, it is hard to understand why the Victorian government allows Melbourne's water catchments to

be logged (particularly to produce paper, which can easily be made from 100% post-consumer material) and we should seek to understand how the large native forest estate in Gippsland could be used to produce high quality, low cost, water instead of woodchips

SPECIFIC RECOMMENDATIONS IN RELATION TO ALL RFA'S

In the above context, we consider that:

1. The review of existing RFA's should be fundamental, not superficial. We should not assume that it is 'business as usual' with some adjustment at the margin. Specifically,
 - a. The review should assume a 'zero base'. If we were starting with a clean sheet of paper today, and in the light of all relevant competing values, how would we manage our remaining forest estate (remembering that the CAR reserve system covers only 18 per cent of Victoria's pre-1788 forest area)? To make this point completely clear, there should be no 'a priori' assumption that logging will continue in any of Victoria's native forests
 - b. There should be a particular focus on the viability of clear felling as a method of harvesting in native forests. It is almost an article of faith in the forest industry that clear-felling is essential. However:
 - i. This assumption is driven by a pulpwood mentality, when the emphasis should be overwhelmingly on the production of high grade sawlogs
 - ii. Single tree selection (STS) methods have advanced greatly worldwide and are extensively used in other countries
 - iii. Group Selection may represent a viable intermediate option, provided it is not viewed (as it is now) as a thinly-disguised method of clear-felling
2. A set of high-level principles would be helpful in enabling the RFA revision process to reach, and maintain, high quality decisions. Principles are decision rules, and we suggest the following for consideration (not in order of importance, and to some extent over-lapping):
 - a. **The principle of inter-generational equity** – adopting the 1987 Brundtland Commission definition that we must 'meet the needs of the present without compromising the ability of future generations to meet their own needs'
 - b. **The principle of urgency** – recognition that we now face extreme risks that must be met by an appropriately robust response to these risks. We must not fail to meet the mark and must be willing, if necessary, to take tough decisions with a 'whole of government' response
 - c. **The principle of community primacy** – recognition that wider community interests must take precedence over narrow commercial interests (despite historical precedent and recognizing that it is the community that owns our native forests)
 - d. **The principle of scientific rigour** – ensuring that all material that informs decision making is evidence-based, independent of any particular interest, and transparent in its presentation

THE WESTERN REGION RFA

It is our view that the Western RFA should have been cancelled long ago, given that the Otway forests – the main focus of this RFA – cannot be logged under legislation introduced in 2002. A continuation of this RFA is fundamentally inconsistent with both the intent and the spirit of the legislation and sends a confusing signal to the community that will continue to cause dissatisfaction and unrest.

The fact that this RFA covers an area larger than the Otways can be dealt with in one of two ways:

1. The boundary of the Western region can be re-drawn to exclude the Otway National Park and Otway Forest Park
2. The RFA can be cancelled and logging activities within the region, but outside of the Otways, can be managed through specific policy arrangements.

In this regard, we are mindful of the legitimate concerns that various communities in the Western Region have about the destructive effect of logging in areas where other values such as water, biodiversity and tourism should be accorded higher priority

