



The Goulburn Valley Environment Group Inc.

6-7-19

To whom it concerns,

Re: Regional Forest Agreement Modernisation Review

Thank you for the opportunity to have input into this process. Our feedback is as follows.

Overall summary

Goulburn Valley Environment Group has been involved with the RFA process in North east Victoria since the negotiation of the first agreement nearly 20 years ago. During this period, the RFAs have failed to deliver on their over-arching objectives and we believe should not be renewed in their current form. Instead, we suggest that if RFAs are to be renewed, they should focus on conservation of our public-land forests for other values and ecosystem services – in particular biodiversity conservation, carbon storage and sequestration and contributions to water catchments.

Recent analyses have demonstrated that the ecosystem services provided by mature forests in terms of increased water yields in Melbourne's catchments are now more valuable than their commercial timber values. Stopping deforestation of native forests and retaining the forests for their carbon storage potential is now increasingly urgent as an action to help deliver on the Australian Government and Victorian's Government's emission targets. We consequently urge both Governments to use this opportunity to genuinely modernize the goals for native forest management in Victoria, with a focus on enhancing these ecosystem service values and maximizing their natural capital.

What should the Victorian RFAs aim to achieve over the next 20 years?

In the context of rapid climate change, reduced water yields and unprecedented biodiversity loss, renewed RFAs should:

- focus on the protection and management of those forests for increased carbon storage, biodiversity values and water yields
- complete the logging industry's transition out of native forests and into plantations.
- complete the establishment of a Comprehensive, Adequate and Representative reserve system on public and private land in each RFA, using those mechanisms recognised by the National Reserve System as appropriate forms of legal protection.

Particularly with regard to the North East RFA, we note that this revised approach to forest management would help achieve:

- substantial improvements in the reserve system, for example by increasing the reservation of under-represented land systems and forests such as the Strathbogies Ranges (SOSF 2018, https://strathbogiesustainableforests.files.wordpress.com/2018/09/protectingthestrathbogieforest_web_2.pdf)
- protection of many forest areas identified as being important for climate adaptation (e.g. GBCMA 2016)
- protection of many areas of forest known to be significant for biodiversity conservation (VEAC 2017a; ARI 2018, https://www.ari.vic.gov.au/_data/assets/pdf_file/0025/396700/ARI-Technical-Report-293-Estimating-density-of-Greater-Gliders-in-the-Strathbogies-Ranges.pdf);
- increased water yields into the Murray Darling Basin (ACF 2009, https://www.ari.vic.gov.au/_data/assets/pdf_file/0025/396700/ARI-Technical-Report-293-Estimating-density-of-Greater-Gliders-in-the-Strathbogies-Ranges.pdf)

What are the potential improvements you think should be made?

There needs to be a fundamental re-evaluation of the highest values these native forests can provide to Victoria and Victorians in terms of their ecosystem services as mature forests, and helping contribute towards emissions reduction, climate-change adaptation potential (GBCMA 2016), improved water yields and biodiversity conservation.

If the RFAs are renewed, there also needs to be strong focus on achieving the RFA's commitment to establishing Comprehensive, Adequate and Representative reserve, as required under the National Forest Policy Statement (1992). The most recent assessment of Victoria's reserve system estimates that there is still a 2.1 million hectare gap in Victoria's reserve system (VEAC 2017b), despite 40 years of systematic land-use planning on public land. Delivering on this reservation objective would strongly assist with many of the biodiversity protection and reservation objectives and targets set out in current Victoria's Biodiversity Plan

How could the potential improvements in the consultation paper help modernise the Victorian RFAs?

The paper explicitly recommends that Victoria's RFAs should support Matters of National Environmental Significance under the Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act—our nation's current environment law) (see p.8, p.44). The best way for the RFAs to support Matters of National Environmental Significance, like Federally-listed species and their forest habitat, is to make logging subject to this law—which, under the current RFAs, it is not.

Do you have any views on which potential improvements are most important?

Yes: recognising all forest values, conserving forest biodiversity and maintaining ecosystem health, addressing climate change and other large-scale disturbances and promoting Traditional Owner rights and partnership are the top four potential improvements identified in the consultation paper.

There is still a 2.1 million hectare gap in Victoria's reserve system on public and private land to meet the CAR targets. Delivering on this gap is fundamental to ensuring biodiversity protection in Victoria, as recognised in Victoria's Biodiversity Plan.

What are your views on existing environmental protections afforded across the entire forest estate (including parks, reserves and State forests) through the RFAs?

The existing environmental protections afforded across the entire forest estate are totally inadequate. Timber-harvesting practices embedded in the RFAs are not subject to EPBC law and are, for all intents and purposes, not able to be regulated through the FFG Act for species which have become listed under these Acts since the RFAs were first developed 20 years ago.

As the consultation paper points out, “biodiversity continues to be lost from Victoria and further effort is needed to halt and reverse the decline” (p.43). Victoria has 485 forest-dependent species listed as threatened under the state’s *Flora and Fauna Guarantee Act 1988*. The Greater Glider was added to this list two years ago—but is *still without* the legally required Action Statement to support the species’ recovery.

The NE Forest Management Plan which underpins the North East RFA has never been reviewed for efficacy and many of the threatened species protections were never fully implemented. Save our Strathbogie Forests have documented this inadequacy for Powerful Owls in the NE RFA and suggest similar failings for other threatened species. In their current form, therefore, it is evident that RFAs have failed to ensure the survival of threatened species as required under both Commonwealth and State biodiversity legislation. Furthermore, it is evident that timber harvesting practices within the North East RFA have hastened the extinction risk of some threatened species such as Greater Glider through a lack of formal protection zones and a shift from selective logging to clear-felling.

Our group consequently considers that much stronger environmental protections are required as part of any renewed RFA. On this point we take heart from the Victorian Government’s commitment in its Biodiversity Plan to a ‘whole of government commitment to implementation of the plan (Priority 19)) and would hope that increasing obligations on forest managers to ensure the protection of important biodiversity would be part of these commitments.

How could the environmental protections be improved?

In addition to the above points, we note that RFAs and their subsidiary management plans use a system of management zones to delineate forest areas where timber –harvesting should either be excluded (Special Protection Zones) or modified (Special Management Zones) to help conserve particular biodiversity features. These SPZs and SMZs are often small and often isolated from one another by forests allocated for timber production. This approach to the conservation of these biodiversity features contradicts well established principles of nature conservation which aim to ensure that sufficient habitat is conserved to enable ecosystems and populations to flourish. We consequently reiterate our recommendation that a key element of renewed RFAs must be to achieve a Comprehensive, Adequate and Representative Reserve system and help ensure the survival of Victoria’s biodiversity.

We further note that RFAs include SPZs as part of the conservation reserve system, even though they have no formal legal status as protected areas. Future RFA should remove this ambiguity and not allow the inclusion of SPZs as part of the reserve statistics for any designated RFA.

How could the RFAs consider climate change and other large-scale natural disturbances (including bushfires)?

The negotiation of new RFAs between the Commonwealth and the Victorian Government provides a unique opportunity for both levels of Government to recognize the capacity of Victoria's native forests to contribute meaningfully in environmental, social and economic terms towards mitigating the impacts of climate change. If these forests could be managed for their natural capital and contributions to carbon storage and increased water yields, there would be immense benefits not only to the natural environment but also to the viability and well-being of communities and Victoria's agricultural businesses.

In addition, the negotiation of new RFAs provides an opportunity to support large-scale plantation establishment and reforestation of cleared land to help maintain viable timber industries and contribute to increased carbon sequestration.

We would be pleased to discuss any of these points in more detail.

Yours sincerely,

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