

## **Portland Field Naturalists Club submission**

### **Modernisation of the Victorian Regional Forest Agreements**

Please provide your feedback to help inform the Victorian and Australian Governments as they work to modernise the Victorian Regional Forest Agreements.

<https://engage.vic.gov.au/future-of-our-forests/rfa-consultation-paper>

#### **Overview**

The State of Victoria and Commonwealth of Australia have committed to working towards delivering a modernised and harmonised Regional Forest Agreement (RFA) framework to meet the needs of communities, industry and the environment.

As part of this process, the Victorian and Australian Governments want to understand the community's views on opportunities to improve the five Victorian RFAs. Your input will directly inform this process.

An Independent Consultation Paper 'Modernising the Victorian Regional Forest Agreements' has been developed by Dr William Jackson to provide an explanation of what the Victorian RFAs are, how they operate, and how effective they have been. In the paper, Dr Jackson also recommends areas for improvement to Victorian RFAs.

The Victorian and Australian Governments are now seeking your views on these and other areas for potential improvement by posing a series of overarching and more targeted questions. You can provide your response by uploading a written submission (Word document or PDF) or via the online survey below. You may answer as many or as few questions as you choose.

You can respond to the survey by entering your responses under the 'survey' section of this page.

Please click the link below to download the Independent Consultation Paper which may assist you in responding to the following questions.

Opportunities to meet face-to-face with Victorian and Australian Government representatives and share your views will be provided in each of the Victorian RFA regions in June 2019. Further information on these events can be found at: [www2.delwp.vic.gov.au/futureforests](http://www2.delwp.vic.gov.au/futureforests)

Below is a map of the East Gippsland, Gippsland, North East, Central Highlands and West Victoria RFA regions. RFAs for these regions were signed between 1997 and 2000, and all are due to expire in March 2020.

The Independent Consultation Paper poses the five overarching questions on which we are seeking your views. It also identifies key areas for improvement to the Victorian RFAs. We are seeking your response to questions designed to help inform how we respond to these improvement areas. Remember, you can answer as many or as few questions as you choose.

Download the Consultation Paper

Independent Consultation Paper - Modernising the Victorian RFAs - May 2019

#### **Upload a written submission**

If you prefer to lodge a written submission, you can do this by uploading your submission here.

Please include your organisation, name and contact details in your submission.

Choose file...

Please tick the box if you would NOT like your submission (or any aspect of it) made public

**Public consultation via the survey closes Sunday 30 June midnight**



## Survey

### 1. What changes have you seen in the RFA regions?

- **Cessation of ring-barking** senescent trees and tree species of no commercial value.
- **Cessation of Logging.** The most significant change in the Portland Forest Management Area (FMA) has been the recognition of the depletion of commercially viable timber products to the point where logging was ceased and the State Government paid out most of the sawmills.
- **Cobboboonee National and Forest Parks** were declared in recognition of the need to protect the biodiversity of the area.
- **Indigenous collaboration with forest management.**
- **Fire regimes have undergone significant review.** Initially Prescribed Burn programs or Fuel Reduction Burns (FRB) were geared towards forest management for forestry outcomes and ease of achievement, with little if any consideration for the wildlife affected. Consequently endangered species were adversely affected through habitat loss, displacement, loss of food, increased vulnerability to predation and many were incinerated. PFNC has photographic evidence to support this last assertion.

Following the Royal Commission into the Black Saturday Wildfires the burning increased in order to attempt to achieve the 5% of Crown land across Victoria to be burnt every year. Multiple scientific studies warned of the damage to the biodiversity of this broad scale non-specific regime. Eventually the folly of this was recognised and a more 'ecological' and risk specific regimes were instigated, based on modelling.

- **Hazardous Tree Program.** While the logging was still being undertaken the non-commercial trees along the roadsides were spared and now these valuable trees have been bull-dozed under the guise of hazardous tree reduction. This has further eroded the integrity of the habitat for wildlife. We believe that the detrimental environmental impact of this widespread practice was recognised and has ceased for now.
- **Species decline** PFNC has noted a local decline in some species such as the Spotted Quail-thrush, Chestnut-rumped Heathwren, Red-tailed Black Cockatoo, Powerful Owl, Yellow-bellied Glider, Long-nosed Potoroo, Southern Brown Bandicoot, Southern Bent-wing Bat and Heath mouse. There are other species not listed which are threatened locally, which we believe is due to fire management and past logging practices which have altered the forest integrity.
- **Extinction Crisis** has been recognised nationally and internationally which needs to be addressed through habitat preservation and enhancement. We also believe that species which are locally threatened but not necessarily listed on State or Federal Threatened Species lists also need their habitat secured.

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

- **Preservation of biodiversity.** The aim of the RFA over the next 20 years should be the preservation and enhancement of habitats for the benefit of the Victorian biodiversity. This should be of the highest priority as remedial actions are expensive, and do not replicate the original ecosystems. Future generations do not deserve to have to undertake these expensive recovery programs because of avarice, neglect or wanton disregard for the intrinsic value of our native flora & fauna by current and past land management practices. A case in point is the South-eastern subspecies of the Red-tailed Black Cockatoo, (an EPBC listed species with limited habitat and food sources.)

- **Prevention of endangered species** from becoming extinct. Biodiversity management needs to address all other species that are locally threatened. Incremental decreases in species' populations over time threatens their survival locally and ultimately statewide.
- **Habitat Retention and Enhancement.** Prevention of habitat threatening processes such as logging and habitat destruction or disturbance. A transition to utilizing alternative materials to timber products (e.g. recycled plastics) is necessary to achieve this.
- **Fire Management** in the form of Fuel Reduction Burn program or Prescribed Burns is a threatening process. Habitat is destroyed for a long time and in some cases altered significantly by burning, leaving many species dead, injured, displaced, starving and vulnerable to predation.  
Large scale burning produces significant pollutants which are detrimental to public health and the health and wellbeing of wildlife.  
An early detection and rapid response is necessary to prevent unplanned fires getting out of control. This requires monitoring during periods of extreme fire danger and the use of thermal imaging and other technology to notify the local authorities to facilitate a rapid response.  
Private landowners should maintain their own fire breaks on their own properties, regardless of their proximity to crown land and roadsides.
- **Threatening processes** need to cease.  
Past forestry practices have modified the forests and have had a detrimental effect on biodiversity, which now needs to be given the highest priority in future management strategies to attain sustainability in a changing environment.  
Logging is also a threatening process and VicForests have already expressed a desire to re-enter the Portland Forest Management Area (FMA). The logging in the Portland FMA ceased due to past over-logging and the poor quality of the timber produced. The forest has not recovered in the intervening 10 years and a further 100 years or more is required before a healthy forest is achieved. Many hollow-dependent fauna e.g. Powerful Owl requires nest hollows which can take 150 years or more to form.
- **Increase the CAR reserve system and increase legislative protection through National Park status** to provide habitat for listed species populations to increase. In the West RFA this should include parts of the Drajurk, Dergholm, and Annya State Forests.
- **National Parks and reserves should be funded directly.** We support the call for increasing funding to at least 1% of State Government spending for Parks Victoria to manage parks and reserves. (We do not have confidence in DELWP management of the environment.)
- **Habitat Corridors.** Native vegetation corridors are critical for species movements and population survival. Roadside corridors have been decimated in the past but should be retained and enhanced as an adjunct to private and crown land corridor efforts.  
The Habitat 141 project is a step in this direction however an increase in the reservation of public land into the parks system would considerably enhance this project.
- **Climate Change** needs to be addressed on a long-term non-political basis as it affects our states flora and fauna. Current bio-surveys and continued monitoring needs to be undertaken to assess the status of species and the resilience shown to the effects of climate change.
- **Invasive Species** Fuel reduction burns have exacerbated the proliferation of invasive species. The management of invasive species (plant and animal) needs to be given greater emphasis and funding over the long term.

### 3. What are the potential improvements you think should be made?

- **Ecological Integrity.**  
There needs to be a greater emphasis on the ecology of forests and less on the wants and needs of humans.
- **Invasive Species.**  
Increase resources allocated for invasive species management. This needs to be perpetual, as eradication of some species is unlikely to be achieved and therefore containment needs to be on-going.
- **Fire management**  
Fire management should be strategically conducted to minimise risk to ecological vegetation classes (EVC) as well as human assets. Burns sites should be in a mosaic pattern over several years to afford at least some safe haven for all displaced animals to survive. Monitoring of species most affected by fire pre and post burn needs to be undertaken to guide future FRB planning to minimise the incremental reduction of biodiversity.  
The extent of any given EVC affected by wildfires need to be factored into the planned burn program which should then be modified in order to safeguard the habitat it provides.  
Planned burns should only be conducted outside of the Fire Ban period given the past record of planned burns escalating into uncontrolled fire. The legislated ban should apply to everyone, including public land managers and Government agencies.
- **Fire wood** collection needs to be better supervised. A licensing system with a meaningful levy should be imposed.  
Given there are significant quantities of 'waste' material from the plantation sector which is currently burnt on site, commercial fire-wood collectors should be encouraged to access these resources.

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

- The Consultation Paper has identified many areas for improvement which if adopted and undertaken should provide for a healthier environment for Victoria's flora and fauna.

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

- That biodiversity within our forests is of the highest priority which must be maintained and enhanced.
- Any activities which compromise or diminish the biodiversity values of any forest should not be permitted or conducted.
- That the implications and effects of climate change be included in the next RFA and that these implications determine the principles guiding the management and practices of VicForest.
- That VicForests and the State Government plan for and work towards transitioning from native forest to plantation timber products without converting native forests to plantations.
- Ensuring environmentally significant areas are protected from human activities in designated special protection zones and managed as reference area.
- A reduction in the area and frequency of prescribed burns. Whilst we understand the expectation that the interface between private and public land is treated with prescribed burns, it is our belief that areas within a forest that do not border private assets should not be subjected to prescribed burning.
- We believe that logging should not be re-introduced into areas where logging has been banned
- We believe that any increase in extractive logging in forests where logging is currently occurring should not be allowed.

The Independent Consultation Paper suggests that:

“Whilst the vision of Australia’s National Forest Policy Statement included a ‘holistic’ approach to managing forests for all their values and uses, so as to optimise benefits to the community (Commonwealth of Australia 1995), the Victorian RFAs have tended to focus on conservation of forest biodiversity and timber production.

Healthy forests have intrinsic value and can sustainably provide a wide range of benefits to Victorian society and its economy. The benefits that forests provide are known as ecosystem services. The ecosystem services provided by Victoria’s forests include:

- Water supply, wood and fibre, honey
- Regulation of the climate, carbon sequestration, regulation of water catchments, and pollination services
- Opportunities for recreation and tourism, education and scientific research, cultural and historical heritage, and amenity and aesthetic values.

Victoria’s forests give us a sense of place and provide opportunities for social connection. Forests are central to the culture and identity of Aboriginal Victorians.

The Victorian RFAs should more clearly incorporate the wide range of values and benefits that forests provide.” See Section 4 of the Independent Consultation Paper for further information.

#### **6. How do you use forests in your region?**

- Portland Field Naturalists’ Club members frequent the forest, parks and reserves in the region for recreation and study on a regular basis. An appreciation of the diversity of the natural world is a significant part of our club’s activities. Passive recreation and relaxation is vital for our well-being.

#### **7. How could the RFAs better provide for multiple forest uses (i.e. recreation, conservation, livelihood and economy)?**

- We believe our regions forests have been used for economic and livelihood benefits to the detriment of the forests and the ecosystems and biodiversity they support.
- Forest management to support and enhance the sustainability of the various ecosystems is what is needed. This could encompass environmental education, academic research projects, conservation and limited ecotourism.

### **1.2 CONSERVE FOREST DIVERSITY AND MAINTAIN ECOSYSTEM HEALTH**

The Independent Consultation Paper suggests that:

“Two decades ago, the RFA process supported the expansion of the CAR reserve system and included a focus on threatened species. However, despite these efforts, biodiversity continues to be lost from Victoria and further effort is needed to halt and reverse the decline.

The modernised RFAs should respond to the likely impact of climate change and other environmental pressures on threatened species, threatened ecological communities and key threatening processes by including the adaptation mechanisms needed to address these impacts. The RFAs should support:

- Victoria’s biodiversity plan including broader scale threat management, specific threat management and supporting collaboration between stakeholders to drive improvement in biodiversity conservation (see, Department of Environment, Land, Water and Planning 2017)
- Matters of National Environmental Significance under the Commonwealth’s Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).

The most relevant Matters of National Environmental Significance for forests include, national and world heritage, wetlands of international importance (listed under the Ramsar Convention), listed threatened species and ecological communities, and migratory species protected under international agreements (see, Department of the Environment and Energy n.d.). To conserve forest biodiversity and maintain ecosystem health, the modernised RFAs should include a range of conservation strategies, including changes to the formal and informal CAR reserve system, restoration of EVCs, improving connectivity between fragmented EVCs, and working with private landholders to conserve under-represented EVCs.”

See Section 4 of the Independent Consultation Paper for further information.

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

- PFNC members have grave misgivings the current protections are robust enough to withstand the pressures from VicForests and the timber industry, and the tourism industry ( e.g. the suggestion the Great Ocean Road hinterland planning could be undertaken by a tourism panel.)
- Wildlife protection laws make it unlawful to harm, harass, disturb, maim, kill or injure wildlife but the Victorian Government continues to afford some members of the community immunity to these laws. In view of the extinction and climate change crises this needs to change with greater accountability and consideration for animal welfare especially as it pertains to prescribed burning.

#### **9. How could the environmental protections be improved?**

- Public education of current environment laws and effective enforcement. Fines should be sufficient to cover the cost of enforcement.
- Increase the National Parks area to include the Drajurk State Forest, a significant habitat for the nationally threatened sub-species of the Red-tailed Black Cockatoo.
- Increase funding to National Parks to monitor and manage breaches of environmental laws.
- Ensure greater transparency of VicForests operations and provide independent monitoring of their activities. Address breaches of their operating licence conditions with meaningful penalties or rescinding the licence.

### **1.3 PROMOTE TRADITIONAL OWNER RIGHTS AND PARTNERSHIP**

The Independent Consultation Paper suggests that:

“DELWP has already committed to building collaborative relationships and working partnerships with Victorian Traditional Owner groups. This includes increasing the involvement of Traditional Owner groups in the management of country (see, Department of Environment, Land, Water and Planning 2015a).

The RFA modernisation process provides impetus to include meaningful consideration of the rights and aspirations of Traditional Owners in the RFAs and Victoria’s forest management system.

The RFAs should support the recognition of the rights of Victoria’s Traditional Owners to partner in land management on parks, reserves and State forests, and seek economic and cultural opportunities for Aboriginal Victorians.”

See Section 4 of the Independent Consultation Paper for further information.

#### **10. What opportunities could the RFAs provide to support access to and traditional use of forests by Traditional Owners and Aboriginal people?**

**11. How could the RFAs enable the legal rights of Traditional Owners to partner in land management and seek economic and cultural opportunities to be realised in future forest management?**

**THEME TWO: THE LONG-TERM STABILITY OF FORESTS AND FOREST INDUSTRIES**

**2.1 ADDRESS CLIMATE CHANGE AND OTHER LARGE SCALE DISTURBANCES**

The Independent Consultation Paper suggests that:

“Climate change and other large-scale disturbances, including landscape-level fires and invasive species, are threats to Victoria’s forest biodiversity, forest-dependent industries and the communities that live near forests.

A modernised RFA process should ensure that forest management decisions are informed by up-to-date scientifically-credible information on the current and likely future impact of climate change and other large-scale disturbances. This includes improving our understanding of how the interaction between climate change and other pressures on the natural environment is leading to cumulative impacts, and amplifying the threats faced by forests.

Forest management strategies for State forests, parks and reserves should incorporate multi-scale actions that build the resilience of Victoria’s forests, including State-wide policy and guidance, landscape level actions across RFA regions, and local level forest management actions.”

See Section 4 of the Independent Consultation Paper for further information.

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

- PFNC endorses the recommendations outlined in the Consultation Paper, however we are sceptical that increasing control burns diminishes the risk of wildfire, given the history of wildfires burning through recent planned burn sites. We also note that private landowners and plantation companies need to play a greater role in protecting their own assets, so that public land ecology is not undermined by risk management practices (such as ecologically unsustainable frequency of prescribed burns).

**• 2.2 SUPPORT THE DEVELOPMENT OF FOREST DEPENDENT INDUSTRIES**

The Independent Consultation Paper suggests that:

“The Victorian RFAs have not achieved long-term stability of supply for the timber industry. Without certainty of supply, it is difficult for the timber industry to invest with confidence, to develop value added approaches to processing wood products or to support efforts to reduce greenhouse gas emissions using low embodied energy building materials that store carbon.

In addition, there are a range of industries that are dependent or partially dependent on healthy forests. These include the tourism and recreation industry, apiary, and the water industry.

The RFA modernisation process should consider how governments can best support the development of forest-based industries, including the forest and wood products industry, tourism and recreation industry, apiary, and the water industry, and ensure that these industries are sustainable into the future.

This process should include consideration of climate change, severe fires, invasive species, Matters of National Environmental Significance, and other factors that present a challenge to the viability of forest dependent industries.

The RFA modernisation process should also consider opportunities to encourage investment in innovation and new market opportunities.”

See Section 4 of the Independent Consultation Paper for further information.

### **13. How could the RFAs better address industry sustainability?**

- Native forests can no longer meet the demand for timber products. This situation will be exacerbated by the projected population growth and therefore plantation timber and recycled products are needed to supplement and ultimately replace the native forest timber products.

### **14. How could the RFA’s encourage investment and new market opportunities for forest-based industries (including the forests and wood products industry, tourism, apiary and emerging markets such as carbon)?**

- Victorian forests need considerable time to recover from current and past logging practices, therefore any new industries will need to involve protection and enhancement of native forest ecology and ecosystems.
- Tourism expansion should be carefully monitored and managed to ensure the integrity of the natural attractions is not compromised through trampling, litter, spread of disease, invasive species, constructions of amenities, etc. Community education of the value and importance of natural environments, and the flora and fauna should be the main emphasis of tourism projects.

## **THEME THREE: GOVERNANCE AND MANAGEMENT OF VICTORIA’S FORESTS**

### **3.1 SUPPORT THE VICTORIAN GOVERNMENT EFFORTS TO IMPROVE FOREST MANAGEMENT PLANNING**

The Independent Consultation Paper suggests that:

“Victoria’s approach to forest management planning has served the State well, but forest management plans now require renewal. The Victorian Government has indicated an intention to update forest management plans and it is important that this happens.

Changing the approach to forest management planning and extending the new approach across the State will take time. The RFA modernisation program provides an opportunity to identify milestones to help the Victorian Government work towards achieving the necessary reforms over the coming years. It also is an opportunity for the Victorian Government to obtain feedback from stakeholders on forest management planning, and to collect information that will help in the development of a more inclusive, adaptive and consultative approach to forest management planning.

Overall, forest management planning for public forests (including State forests, and forested parks and reserves) should aim to deliver ecologically sustainable forest management and work towards the State’s vision for forests. It should be undertaken in partnership with Traditional Owners.

Moreover, as new knowledge is acquired, and circumstances related to forests change, the forest management planning system will need to adapt. For this reason, the reforms to forest management planning should be an ongoing process of improvement.”

See Section 4 of the Independent Consultation Paper for further information.

### **15. How can the RFAs support the adaptive management of Victoria’s forests in response to emerging issues (e.g. major bushfires) and opportunities (e.g. emerging industries)?**

- Establish and maintain up-to-date bio-surveys to guide future management plans throughout the life of the RFAs.

- As stated in the Consultation Paper, “This process should include consideration of climate change, severe fires, invasive species, Matters of National Environmental Significance, and other factors that present a challenge to the viability of forest” ecosystems.

### **3.2 IDENTIFY RESEARCH PRIORITIES**

The Independent Consultation Paper suggests that:

“The Australian and Victorian Governments recognise that continuing research can contribute to improved outcomes for adaptive management and continual improvement in forest management, as well as in the management of Matters of National Environmental Significance, social impacts and benefits, and industry development (Department of Agriculture and Water Resources et al. 2018). The Governments also recognise that research priorities will change and evolve over time as new information is generated and as circumstances change.

The RFA modernisation process should facilitate negotiations on forest research priorities between the Victorian and Australian Governments, including identifying how existing research programs and investment can be better utilised. There is, for example, a need for more research into:

- The state and trend of pressures on forests, and the effectiveness of management actions to address pressures
- The implications of an increasing gap between demand for wood products and the ability of Victoria’s forests to supply these products
- The implications of the steady decline in the number of forestry graduates from Australian universities.”

See Section 4 of the Independent Consultation Paper for further information.

#### **16. What areas of research would better equip us to sustainably manage Victoria’s forests?**

- Need to ensure designated unburnt reference areas in each EVC are maintained and used to guide management decisions.
- More research into the role of invertebrates in healthy forest ecosystems and the effect of management practices, such as fire regimes.
- More research into the role of non-flowering plants e.g. fungi, mosses and lichens, in healthy forest ecosystems, also affected by fire regimes.
- How soil biota is changed by forest management practices such as compaction by logging machinery, understorey destruction, varying fire regimes, rainfall and climate change.

### **3.3 IMPROVE MONITORING AND REPORTING**

The Independent Consultation Paper suggests that:

“Forest management needs to be based on robust data and systematically monitoring, evaluating and reporting on the objectives of forest management (Department of Agriculture and Water Resources et al. 2018).

The Victorian Forest Monitoring Program has already begun to provide information, including baseline data for long-term trend detection, which is being used to inform continuous improvement in the management of Victoria’s forests. The Victorian Government has also engaged in the development of environmental-economic accounting to provide better, integrated and more consistent information and analysis on environmental assets, including forests.

The RFA modernisation program presents an opportunity to continue to improve monitoring and reporting to enhance evidence-based decision making and improve the transparency of forest management with the community.

**Actions to be considered in the RFA modernisation process include:**

- Review the current suite of indicators used to report the state and trend of forests and forest-dependent industries, including a review of gaps (e.g. socio-economic values, climate change and emerging pressures), and the relevance and cost effectiveness of current indicators
- Continue and improve the Victorian Forest Monitoring Program
- Provide better information on the effectiveness of the informal reserve system and forests on private land in protecting biodiversity
- Expand efforts to engage people in monitoring and citizen science in State forests, parks and reserves
- Enhance reporting on key sustainability indicators, including indicators of the effectiveness of forest and park management, in formats that are readily understood by decision makers and the community
- Improve the alignment between the various forest-related reporting systems, including the State of the Forests Reports, the State of the Parks Reports and the RFA reports and reviews, to enable stakeholders to have a more transparent view of the state and trends of the entire forest estate
- Improve the RFA review and reporting processes and the reporting on the outcomes of, and responses to, forest audits
- Continue to develop environmental-economic accounting and use the results to build a shared understanding with the community about the state and trend of all values provided by forests
- Promote regular engagement between forest management agencies, Traditional Owners and the science and research community.”

See Section 4 of the Independent Consultation Paper for further information.

**17. How could RFA monitoring, review (including five-yearly reviews) and reporting arrangements be improved?**

- PFNC supports the recommendations outlined in the Consultation Paper above.

Email address Required

████████████████████

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Yes

Please tick the box if you would NOT like your submission (or any aspect of it) made public

## Privacy Statement

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The personal contact information you provide will be kept separate from the body of your submission and used to administer the public consultation process only.

Your personal contact information will not be circulated outside of DELWP. Your contact details may be used by DELWP to update you on the results of the consultation process. We might also need to seek clarification from you on your submission.

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2. Quote directly from your feedback in the DELWP response to feedback.

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