



30 June 2019

To whom it concerns,

Modernisation of the Victorian Regional Forest Agreements

Thank you for the opportunity to comment on the Independent Consultation Paper regarding the Modernisation of the Victorian Regional Forest Agreements.

Trust for Nature (the Trust) is Victoria's dedicated private land conservation agency, established under statute, and responsible for ensuring the long-term protection of biodiversity on private land in Victoria. Trust for Nature occupies a unique role within Victoria's natural resource management sector for the following reasons.

- It operates statewide and is Victoria's primary authority biodiversity and natural resource management conservation on private land.
- It has helped protect more than 100,000 hectares of important habitat on private land, principally by entering into voluntary legal agreements on title with more than 1400 committed landowners.
- It has an ongoing land stewardship program on its covenants and reserves based on management plans prepared for each protected site, and regular repeat visits and reviews.
- It has prepared a Statewide Conservation Plan for all private land in Victoria which underpins its conservation work and provides an integrated framework for planning and operations across Victoria.
- Whilst our statutory conservation objectives and functions relate only to private land, the realities of land tenure and conservation planning in Victoria requires that strategic approach to conservation in Victoria encompasses both land tenures. The Trust's expertise on conservation issues across the State thus assists with input into all statewide conservation issues.

It is in this context that we provide comments on the consultation paper. Our comments are structured using the on-line survey as a guide.

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

a. In line with the objectives of the 1992 National Forest Policy Statement and all RFAs, the Victorian RFAs should aim to contribute as much as possible to a Comprehensive, Adequate and Representative (CAR) reserve system on public and private land, using those mechanisms recognised by the National Reserve System as appropriate forms of legal protection.

b. In the context of a rapidly changing climate, the RFAs should aim to ensure that Victoria's forests are being managed sustainably for key ecosystem services such as carbon sequestration, water yields and pollination, and ensure that the relative value of such services are properly evaluated relative to commercial forestry uses.

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

For all RFAs, we consider it is critical that they aim to achieve their objective of establishing a Comprehensive, Adequate and Representative reserve system. Meeting this reservation objective will be especially important in those regions and bioregions identified as priorities for increased protection in recent statewide assessments undertaken by Trust for Nature (2013) and VEAC (2017).

Relevant information from each of the CMA's climate-adaptation plans should also be considered as part of the assessment of public-land forests in each RFA to identify those which might be managed more sustainably for their ecosystem-service values and resilience capacity in the context of climate change (e.g. GBCMA 2016).

Specifically relating to the private-land estate within every RFA, we note that additional protection of private land through land purchase or covenants will be required to help meet the 2.1 million hectare gap in Victoria's current reserve system (VEAC 2017) and the corresponding gap in protection in each RFA. Trust for Nature accordingly suggests that the Modernised RFA Agreements in Victoria should establish mechanisms to facilitate private-land protection as part of the broader delivery of the RFAs' CAR commitments in each RFA region. This program would also help meet the Biodiversity Plan's target of 200,000 ha of additional permanent protection on private land over the next 20 years. We note that the Tasmanian RFA included funding support for a dedicated private-land protection program and propose that this could be used as an existing precedent for design and funding options (Attachment 8 of Tasmanian RFA Agreement).

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

Trust for Nature supports the proposal to recognise all forest values (4.1.1). There is a good evidence base around the values of mature forests in increasing water yields and carbon sequestration, helping improve the resilience of ecosystems in the context of climate change.

Trust for Nature supports the recommendations to improve conservation of forest biodiversity and maintain ecosystem health (4.1.2), and the emphasis on helping maintain and improve the health and connectivity of ecosystems in the context of climate change.

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

As noted above, there is still a 2.1 million hectare gap in Victoria's reserve system on public and private land to meet the CAR Reserve criteria. Delivering on this gap is fundamental to ensuring biodiversity protection in Victoria, as recognised in Victoria's Biodiversity Plan (9.2).

1.2 CONSERVE FOREST DIVERSITY AND MAINTAIN ECOSYSTEM HEALTH

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

We note that there remains a 2.1 million hectare gap in the reserve system to meet CAR criteria for the NRS in Victoria (VEAC 2017), in addition to the existing reserve estate of 3.8 million hectares. This is a substantial deficit and means that many ecosystems within the forest estate are poorly conserved and at risk of degradation from a range of threats. As shown in the Table below, for example, more than 2 million hectares of native vegetation within the five Victorian RFAs is under-represented in the existing reserve system, and a majority or significant proportion of that under-represented vegetation is on private land. This is especially so in the West, Central Highlands and North East RFAs.

RFA	extent of RFA	private land %	total extent Native Vegetation	%NV on private land	total extent under-represented native vegetation	% under-rep NV on private land
Central Highlands	1,133,705.83	40.32	806,059.20	23.38	186,208.24	58.92
East Gippsland	1,211,509.07	12.17	1,133,185.64	7.38	78,921.42	20.14
Gippsland	2,713,142.13	40.56	1,813,430.18	17.02	499,868.02	42.34
North East	2,274,089.60	44.93	1,471,751.14	23.51	431,559.45	58.55
West	5,852,752.18	78.11	1,815,981.13	47.00	1,092,433.88	64.38
TOTAL	13,185,198.82	55.35	7,040,407.29	25.29	2,288,991.01	56.50

Trust for Nature's Statewide Conservation Plan for Private Land in Victoria (2013), documented that most under-represented ecosystems occur on private land and that, for some bioregions and ecosystems, the most effective opportunities for increased protection occur on private land. This point is also made in Victoria's Biodiversity Plan and could be addressed usefully through the modernised RFAs. As shown in Attachment 1, all of the RFAs include under-represented bioregion and for many of these the majority of their extent is on private land, underlining the importance of additional private-land protection in meeting the RFA's CAR reserve goal.

9. How could the environmental protections be improved?

The current gap in existing protection in each RFA could be addressed effectively by implementing a targeted program of private-land protection through land purchase or covenant agreements. We suggest that this could be achieved through a combination of an incentive program (as per the Tasmanian RFA private-land protection program) and an expanded Revolving Fund program administered by the Trust.

This two-pronged approach would help achieve RFA commitments and also help achieve biodiversity n protection commitments under the Victorian Government’s Biodiversity Plan.

Trust for Nature also considers that there is scope to review Commonwealth or State biodiversity conservation laws and subsidiary policies and procedures to formalise the protection of some categories of land being managed already for conservation within the NRS framework. These could include, for example:

- Ramsar Wetlands which, while listed as Matters of National Environmental Significance, are not automatically included as part of the NRS on that basis;
- Commonwealth Defence land being managed under formal arrangements for conservation.

Such administrative changes could potentially assist with reducing the existing gap in Victoria’s reserve system.

Operationally, Trust for Nature notes three areas of interpretation applied by RFAs and/or the Consultation Paper to the CAR criteria which are inconsistent with the criteria used by the National Reserve System and/or JANIS criteria for its designation of ‘protected areas’. We suggest that the modernised RFAs could be improved by addressing all three issues.

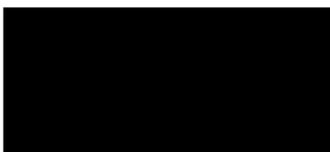
First, the RFAs include both ‘formal’ and ‘informal’ reserves within the CAR Reserve definition, even though the ‘informal’ reserves, such as Special Protection Zones, are not recognised by the NRS. This approach has two consequences – it conflates what are informal protection zones under a planning process with the concept of ‘nature reserves’; and the statistics generated on the % of different EVCs protected in reserves use the informal and formal statistics together, providing misleading statistics on how much of each EVC is formally protected. For future RFAs, we recommend that only the formal reserve categories are used to assess reservation statistics, and that informal reserves be given another title.

Second, the tables included in the Attachments to each RFA on the hectares and % of each EVC in different land categories express the area of habitat in reserves as a % of the total current extent of each EVC. This differs from the JANIS and NRS criteria whereby it is the % of the pre-1750 extent which is pivotal to determining how much additional vegetation needs to be conserved. Trust for Nature recommends that future RFAs amend their reporting to align with the JANIS and NRS approach.

Thirdly, for consistency, we note that the Consultation Paper reports on the protection level of Ecological Vegetation Divisions (i.e. groupings of EVCs) rather than EVCs. This approach is not consistent with NRS reporting and potentially leads to over-estimates of Victoria’s progress with regard to bioregional protection levels of all EVCs. Again, we propose that this issue be addressed in future RFAs.

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

Yours sincerely,



Attachment 1. Breakdown of RFAs by bioregion and the % on private land. The ones highlighted in yellow have less than 10% of their land area included in protected areas

RFA_Name	BIOREGION	Total area	Extent on private land	%
Central Highlands	Central Victorian Uplands	171,272.28	144,514.13	84%
	Gippsland Plain	36,288.55	33,470.11	92%
	Highlands - Northern Fall	270,722.86	55,945.58	21%
	Highlands - Southern Fall	519,771.48	191,846.49	37%
	Strzelecki Ranges	9,833.21	9,008.93	92%
	Victorian Alps	96,975.37	168.42	0%
	Victorian Riverina	1,269.64	1,163.69	92%
	Victorian Volcanic Plain	27,572.45	21,038.39	76%
East Gippsland	East Gippsland Lowlands	434,609.12	56,129.06	13%
	East Gippsland Uplands	567,746.28	59,060.17	10%
	Gippsland Plain	101.57	18.59	18%
	Highlands - Far East	70,018.50	209.47	0%
	Highlands - Southern Fall	6,273.47	-	0%
	Monaro Tablelands	74,819.95	31,997.60	43%
	Victorian Alps	57,182.80	18.87	0%
	Gippsland	East Gippsland Lowlands	102,048.59	52,716.22
East Gippsland Uplands		223,267.68	70,796.78	32%
Gippsland Plain		838,469.15	614,862.56	73%
Highlands - Northern Fall		210,493.66	65,007.25	31%
Highlands - Southern Fall		629,849.37	53,493.30	8%
Strzelecki Ranges		314,669.31	238,216.29	76%
Victorian Alps		352,986.01	5,208.49	1%
Wilson's Promontory		40,934.67	-	0%
North East	Central Victorian Uplands	392,614.27	303,627.19	77%
	Highlands - Northern Fall	928,229.51	167,977.09	18%
	Highlands - Southern Fall	18,585.95	-	0%
	Northern Inland Slopes	442,941.44	309,954.10	70%
	Victorian Alps	207,125.47	3.87	0%
	Victorian Riverina	282,753.86	239,640.71	85%

West	Bridgewater	18,135.17	7,141.98	39%
	Central Victorian Uplands	621,029.86	428,960.67	69%
	Dundas Tablelands	688,163.73	609,258.16	89%
	Gippsland Plain	17.63	-	0%
	Gleneelg Plain	398,511.02	234,276.09	59%
	Goldfields	244,428.18	189,968.09	78%
	Greater Grampians	237,350.74	45,185.76	19%
	Highlands - Northern Fall	5,786.13	4,691.48	81%
	Otway Plain	237,555.55	154,102.36	65%
	Otway Ranges	149,785.99	41,639.96	28%
	Victorian Riverina	22,753.59	20,382.30	90%
	Victorian Volcanic Plain	2,185,268.49	1,944,302.40	89%
	Warrnambool Plain	264,485.27	229,415.30	87%
	Wimmera	778,105.54	662,210.04	85%