

Submission on the Regional Forest Agreements June 2019

Thank you for the opportunity to make a submission on this important matter.

There are three parts to this submission.

To begin I quote from the Victorian National Parks Association (VNPA) Submission on Victorian Regional Forest Agreements 29 January 2018

In this submission, they outlined ten reasons why the five Victorian RFAs have failed, are now obsolete and should not be renewed or rolled over

- 1 RFAs have failed to meet their objectives
- 2 The ecological targets of the RFAs are out of date
- 3 RFAs are a regulatory relic
- 4 The RFAs ignore climate change implications
- 5 RFAs do not effectively manage threatened species and ecosystems
- 6 The RFAs ignore fire impacts
- 7 RFAs ignore other forest values
- 8 RFA reviews ignore their own previous recommendations
- 9 RFAs give unjustified and unfair special treatment to native forest logging
- 10 The RFAs stifle industry innovation

Please refer to the VNPA full submission for details

I agree the five Victorian RFAs must be allowed to expire, and not be extended or rolled over. Independent Review on the progress of RFA's.

The comprehensive report produced by environmental lawyers on the RFAs found "...that protection of forests' biodiversity and threatened species would be of a higher standard if regulated by the EPBC Act than under the RFA regime."

https://envirojustice.org.au/sites/default/files/files/Submissions%20and%20reports/One_Stop_Chop.pdf

On the West Victorian Regional Forest Agreement [RFA].

I grew up in central western Victoria and have seen massive changes over my lifetime and particularly over the last 20 years as I have lived and travelled in Western Victoria. Nature in western Victoria is struggling to survive. Most of the land is cleared and cropping increasing at a fast rate with losses of farm trees making the remnant public forests, most of them small, even more important for the survival of biodiversity.

Each year as we volunteers count the nationally endangered South-eastern Red-Tailed Black-Cockatoo, monitor Malleefowl and perform conservation work on Trust for Nature properties we see the ecological damage done in the forests and woodlands.

Again I wish to quote from the VNPA:

The Western RFA is based on a false premise, is obsolete, and should be cancelled because:

- There is little native forestry industry left in the west;

- It was originally set up due to the export of woodchips, but there is no longer native forest export from the west of the state;
- It is largely state-funded and unprofitable;
- Independent reviews have recommended for the Western RFA to be cancelled;
- It is ecological-damaging and has delivered little to protect native forests since its inception, despite the promise that it would do so;
- There are still significant gaps in the protected area and reserve system in western Victoria;
- The west is an area rich in threatened species and endangered habitats which should be protected. Summary Report June 2019

Firewood and minor logging produce coupes are continually depleting remnant gum woodlands of habitat in this slow growing region. The damage being done is totally out of proportion with the little income earned by these practices. Most gum woodland, with its richer soil, is on private land and less accessible to wildlife so the small patches on public land are crucial for many species. Much more conservation is needed, for example the whole of the Dergholm State Park block which includes unprotected gum woodlands should be included in the park. So too forest blocks such as Kalingur and others.

One of the tragic results of the recent fires in the eastern Victorian forests [forests very different from those in the west] has been the application of increased planned burning which has brought huge losses of habitat to western forests and woodlands. These 'out of the way' wildlife sanctuaries had been quietly evolving and had become important old growth for mammals and birds. But the increased burns have changed them and destroyed much of their value to wildlife. Planned Burns take away the food of the RTBC. A recent one witnessed in 2019 burnt stringy bark trees severely, including part of a forest already burnt severely in 2010 and where edible seed food had not yet recovered. The latest burn will mean no food for the RTBC, in this stringybark forest, until the 2030's. The species is in low numbers, feeding mostly on two species of stringy bark its only other source of food being the buloke, a tree that is 97% cleared. The RFA has failed and fails to protect this species.

Coupes are planned across the west RFA, including areas needed for the RTBC, one of 20 priority bird species under the Australian Government's Threatened Species Strategy. There are eight state forests with records of these birds in or adjacent to coupes in the Horsham FMA alone, yet these iconic birds will not get the levels of assessment and potential protection they deserve, if their habitat is a target for logging on the public side of the fence. You can see the detailed VNPA analysis:

"Across western Victorian forests, 70 per cent of the area targeted for logging contains native vegetation types that are either endangered (19 per cent) vulnerable (11 per cent) or depleted (40 per cent). • In the Horsham Forest Management Area, 54 per cent of the vegetation proposed for logging is endangered. • More than 20 threatened native animals and 14 threatened native plants were found in or closely adjacent to a third of all proposed logging areas"

There are indeed no economic or ecological reasons for the Western RFA to continue and I urge that it should be cancelled allowing national environmental laws to apply to protect threatened species and habitats.

It should also be noted in www2.delwp.vic.gov.au.

“There are a number of key issues that I have recommended the Parties consider for the continued implementation of the RFAs. The most critical of these is consideration of cancelling the West Victoria RFA or substantially amending the RFA given the significant additions to reserves* and reduction in timber availability made since the agreement was signed.

* Note the reserves were made, not as a result of the RFA management, but through initiatives by the public.

On the economic front little native forest industry is left, mills have closed because of lack of wood in these slow growing, highly cleared regions, generous payouts have been made and communities like Forest flourish after the end of logging. Reports show the low grade posts and poles logging, and firewood taking, are part of a heavily subsidised industry that causes more damage to ecosystems than it is worth. Nearly \$680,000 subsidy only able to make a negligible profit of \$22,000, 2016 -2017 VicForests Annual Report

In this context it would be far better to end this subsidised competition in western native forests and promote a number of other wood growing activities e.g. woodlot /shelterbelts on farms some specifically able to be used for profitable firewood, negotiate with blue gum companies to have areas of the land for firewood and post harvesting and sales, and Rowan Reed type tree growing for high quality furniture grade timber which has now achieved success.

(Radio National Programme 26 06 19)

Part B

On East Gippsland Regional Forest Agreement June 2019

In one of the world’s most important forest regions, Far East Gippsland, we are in need of a world class series of sanctuaries and national parks to protect most of the native forests found there.

We are not back in the 1970’s when the devastating wood chip industry began and when knowledge about climate change was in its infancy. We are well into the 21st century when the call world over from reputable scientists and researchers is to conserve the forests that remain and plant trillions of trees in addition. The trillions of new trees, although important, will not make up for the destruction of ecosystems of trees hundreds/thousands of years old ,the carbon stored in their trunks, roots and soils, the common species made rare, the extinctions nor the biodiversity values lost when logged.

Yet this is the situation in Far East Gippsland where losses over the last 40 years have been perpetrated under the RFA. The RFA has failed the forests of Far East Gippsland and should not be renewed.

But first, a personal story:

On Good Friday, 1995, I stood in a logging coupe in Hensleigh Creek in Far East Gippsland. Everywhere around me were the bodies of the great trees felled and still burning, and smoking from the after-logging burn. Some of these trees were just too big to haul onto the trucks. Growing from a seedling, say 500 years ago in Renaissance times, and able to live for how many more decades - who knows, they were now victim of logging operation giving no protection even to the highest conservation forests or threatened species. Other trees, too full of the hollow homes of birds and mammals to make boards or even fence posts – they too were set on fire. The blackened bases of the trunks, upturned, roots in the air, so big they towered over us as we stood there, I, overwhelmed by the sight, weeping, could not bear to look at the experienced scientists with the tears in their eyes.

██████████ can truly say it was one of the most magical times of my life. This place was a biodiversity hotspot. The tallest trees I had ever seen overhead, at our feet soft, mossy walkways where there was no sign of fire. By night owls called, 1000 year old ferns grew beside us while above, Greater Gliders in numbers I had never seen before, and rare in most other places, came out of their hollows in the towering trees, sat on the branches, and let us look.

This scene occurred before the RFA and the tragedy is the RFA has presided over 20 more years of such wanton destruction of the ecosystems of Far East Gippsland, failing to protect the higher forest values. Over 80% of the public do not want this to continue and tourism is hindered.

It is time for the ending of the failed RFA in Far East Gippsland

It was highly significant how often, people all over the country paying tribute at the time of the **recent death of former Prime Minister, Bob Hawke, cited the protection of the Franklin, its forests and waterways, as one of, if not his most outstanding achievement.** A tremendous good that he achieved for us, for Tasmania, and the world.

It is indeed time now for the Premier of the state of Victoria to do the same and protect the great ravines and ridges, the forests in the valleys and the forests on the mountains of Far East Gippsland. There are moments in history when such actions are the right thing to do. National Estate and Special Protection Zones cannot be clearfelled and have their values intact. This RFA should not be renewed

An **independent assessment** by the Victorian Environment Assessment Council (VEAC) found that *'Large areas of East Gippsland are in the highest categories in terms of contribution to forest biodiversity conservation with particularly high contribution patches between Bairnsdale and Orbost, around Bendoc, and east of Cann River. Quoted VNPA website*

To continue the RFA with its devastation of old forests, ferns hundreds of years old, disruption of the soil health, disruption of fungi and eucalypts root growth systems, threatening of the very survival of wild creatures - forest owls, long footed potoroos, spotted tailed quolls and others such as the greater glider that has declined by 50 per cent in East Gippsland during the period of the RFA - loss of the of carbon storage in trees, their roots and soil beneath, removal of tall trees canopy shelter that keep forest floors moist and less fire prone, constant promotion of inflammable regrowth as well as hundreds of hectares of failed regrowth, loss forever of the great grandmother

and grandfather trees that live for hundreds of years inspiring us, the humans and providing numerous hollow homes for wildlife survival is a cause of grief immeasurable .

East Gippsland could be the eco-tourism centre for old-growth, wildlife and wild-forest tourism.

VNPA summarises the effects of logging of forests in East Gippsland:

- dries out and destroys or damages rainforests by removing important buffers
- kills our native animals and destroys or modifies their habitats
- causes siltation of streams
- converts biodiverse forests into intensively managed, species sparse commercial regrowth
- opens up and dries out forests, increasing their susceptibility to fire
- accelerates the spread of feral animals and weeds
- reduces the quality and quantity of water produced by forests
- makes a major contribution to global warming – large volumes of carbon dioxide are released throughout Victoria each year due to regeneration burns.

The burns that follow clear-felling eliminate fire-sensitive and rainforest species. Clear-felling essentially transforms diverse natural forests into tree farms. It becomes a commercial crop, not a natural forest.

While logging remains a major concern, East Gippsland forests are also impacted on by too-frequent fire or poorly managed planned burning. Feral species such as deer, foxes and various weeds are also a significant threat.

Despite a highly flawed RFA process the East Gippsland RFA was signed. Now, because of the massive damage to the forests and therefore the complete failure of this RFA, I recommend there should be only one course of action and that is not to renew the RFA. Scientists, Environment Groups and local Far East Gippslanders and their businesses have the knowledge and will to make a **conservation protected Far East Gippsland** work.

The **Emerald Link parks protection** is a positive and necessary first step. See in Appendix 1, the support of a tourist venture

Appendix 1

Local Level Local support for conservation in Far East Gippsland

[i]Tourist extracts - information from the web

Make the Connection to East Gippsland's Ancient Forests

Category: [Interesting Places](#) Tags: [Australia](#) / [biodiversity](#) / [Emerald Link](#) / [environment](#) August 31, 2018

...The only area on mainland Australia that has preserved the richest biodiversity of continuous forests, untouched since the Ice Age, is in East Gippsland. The area of East GippslandAccording to a local tour guide: “We have tall, wet mountain forests, we’ve got cool and warm temperate rainforests all the way down to the ethereal coastal rainforests and the beaches and estuaries, and we’ve got everything in one corner.”

... East Gippsland takes up only 9 percent of the state, but contains 75 different vegetation types. There are diverse and plentiful plant and animal species surviving in a small area...

..... There is a huge potential to show people this forest and bring people to the area,” said ... the Eco Tour Guide for Snowy River Cycling.

..... Fires and logging are a danger to these forest types. Logging still takes place in the continuous forests and is a serious threat. When the habitat of a forest has been changed by the removal of the tallest and oldest trees, the different types of forests next to it will also be badly affected. The logged forests will be more exposed and unable to protect fragile species that thrive under the canopies of the tall ancient trees...

..... A concept called the East Gippsland **Emerald Link** will connect the ancient forests protecting them for future generations to see and experience as a whole landscape. The East Gippsland Emerald Link will preserve a great landscape of biodiversity. East Gippsland’s wide connected forests can continue to be enjoyed by locals and visitors for recreational activity and remain an amazing environment to learn from.

..... “Where I came from in France, I did a lot of hiking and camping. It’s my first time in East Gippsland. To someone like me, everything here is so exotic — the trees, the animals, the birds, and the insects. Never have I seen this kind of rich, lush vegetation. Everything is so grand and beautiful,” according to ... a French tourist.

Welcome the opportunity to go on a tour and connect with East Gippsland’s ancient forests. Enjoy hiking or biking while learning all about the plants and animals. Experience the change of environments from alpine forest to the coastal shore. If you’re more adventurous: Fishing, camping, rock climbing, 4x4 tours, and kayaking are other options If you are thinking of venturing into the continuous forests, there is ample information available on the East Gippsland [Emerald Link](#) website

[ii]

At the time of the renewal of the EG RFA the **local group GECO**, calling for the RFA to be ended wrote: “For twenty years the native forest logging industry has been exempt from complying with Federal environment laws. The exemption is granted through the Regional Forest Agreements (RFAs).

Every other industry must comply with Federal environment law. But logging in habitat for federally listed threatened species can proceed with legal impunity. They [the RFA’s] should not be renewed....”

Other statements from the local people [see websites of local groups] e.g. Environment East Gippsland.

Also, see <https://rcegippsland.com/gippsland-forests-and-biodiversity/>

Appendix 2

State Level support for conservation protection of Far East Gippsland Victorian

National Parks Association: A State level of support for conservation of Victoria’s native forests and examination of the failure of RFA’s

East Gippsland’s forests support some of Victoria’s finest remaining high-conservation forest. It is also a stronghold for many rare and threatened species once common across the state.

East Gippsland’s forests are of world significance. English botanist David Bellamy described them as ‘the most diverse range of temperate forest ecosystems on Earth’.

They contain rainforests, pristine rivers, waterfalls, rare plants and animals. They are important for wildlife conservation, and are the last stronghold for threatened and endangered species such as the large forest owls, greater gliders, spotted-tailed quoll and the long-footed potoroo.

As the climate changes, these old-growth forests will also play increasingly important roles as carbon sinks and habitat sanctuaries for many of our threatened plants and animals. The best way to protect these forests is by giving them national park status.

Numerous reports over the years have identified unique and biodiversity rich values of east Gippsland forest.

Many Victorian species rely on forests for all or part of their life cycle, including at least 37 frog species, 117 reptiles, 272 birds, 87 mammals and 2853 vascular plants. More than a quarter of forest vertebrate animal species and about 10% of plants are considered extinct or threatened.

An independent assessment by the Victorian Environment Assessment Council (VEAC) found that *‘Large areas of East Gippsland are in the highest categories in terms of contribution to forest biodiversity conservation with particularly high contribution patches between Bairnsdale and Orbost, around Bendoc, and east of Cann River’.*

The VEAC assessment found that of the 79 forest-dependent species, 12 are listed under Victoria's threatened species laws. Timber harvesting is a recognised as a threat to all but one of the 12.

The Victorian government, and now the state-owned logging agency VicForests, has logged many thousands of hectares of high-conservation-value forest, including prime old growth, mature forest and rainforest since clearfelling started in the early 70s. The small patches that remain are extremely valuable.

East Gippsland could be the eco-tourism centre for old-growth, wildlife and wild-forest tourism

Appendix 3

***National Level* The Wilderness Society. An example of National level of support for conservation of Victoria's native forests and examination of the failure of RFA's as seen in Submission on Draft Report on Progress with Implementation of the Victorian Regional Forest Agreements (RFAs) February 2010 The Wilderness Society Victoria Inc**

... Victoria is the smallest mainland Australian state yet it was once Australia's great forest state. Now it is Australia's most cleared state in proportion to its size. Victoria's remaining forests are the only homes for many threatened endemic flora and fauna. These forests contain some of the world's tallest trees, and they contain immense stores of carbon. Due to past clearing and current management practices, Victoria is facing an extinction crisis, with 44% of our native plants and 30% of our wildlife extinct or threatened. The survival of Victoria's flora and fauna depends on the protection and restoration of intact forested landscapes across the state. Logging industry lobbyists and interest groups often state the existence of Regional Forest Agreements ensures that Victoria's endangered species have been protected. The Wilderness Society (TWS) argues strongly against this proposition.

As long ago as 1992, a Federal Government inquiry noted that "...logging old growth forest potentially violates the precautionary principle in that an irreplaceable resource is being destroyed..."

The Wilderness Society Victoria has rejected the legitimacy of the RFAs in the past and continues to do so while proposing positive solutions for healthy forests' futures in conservation.....

Part C

On Central Highlands Regional Forest Agreement June 2019

Much has been written on the forests of the Central Highlands of Victoria. Therefore I will be writing in brief trusting that the volumes of scientific research that have been done already on this much studied forest region of Victoria will be taken up and implemented as soon as possible.

I am deeply concerned about the Survey Question approach 'assuming' logging continues. State and federal governments continue to give their unqualified support to remaining RFAs despite the facts showing their failure to deliver on their purpose.

In particular, the Mountain Ash Ecosystem in this region has been recognized as a truly wondrous forest of the world. In the past, the height - tallest trees in the world -, their cloud- forest ability to catch the rain clouds as they scudded overhead, their lifecycle of over 500 years producing, old stags that house native mammals and birds, the relative infrequency of fires resulting in the presence of old tree, overhead canopy shading the ground and keeping it moist and verdant, not too dense and suitable for ferns mosses and other numerous plants to flourish, water filtered so well it was the cleanest in the world - and still a vital water source for growing populations - forests that gave and could give inspiration and health to human beings, **are forests that are now struggling for their very survival.**

Decades of clear-fell logging and the aftermaths of increased dryness, burning, soil and growth disruption, loss of fully mature and old trees crucial for biodiversity survival, native animals facing extinction through habitat loss and loss of moist forests including rainforest, just to mention a few, have had a devastating effect in the forests of the Central Highlands Forest Region. To my grief I have seen this devastation.

The Mountain Ash Ecosystem is down to 1% intact forest/ old growth and listed as critically endangered on the International Union for the Conservation of Nature (IUCN) Red List of Ecosystems.

This is a sign of massive mismanagement under the RFA's. The Central Highlands RFA has failed this ecosystem, and others, on many fronts. These failures are already documented in inquiries, court proceedings and research.

In the central highlands there are clear indications of biodiversity decline: □ an increase in the number of threatened species from 28 in 2000 to 38 in 2015, and in the severity of their threat category □ a decline in the number of arboreal marsupial animals □ a decline in the condition of habitat consisting of large, old, hollow-bearing trees within a complex forest structure.

https://tsrhub.worldsecuringsystems.com/Ecosystem%20Summary%20Report_V3b_low.pdf

Biodiversity has not been protected in the last 20 years. Now facing numerous problems, that will take decades, and some centuries to remedy, if at all, I strongly recommend the only solution that has hope of saving this forest region: action by the government to implement the thoroughly researched **Great Forest National Park.**

- popular
- long desired by locals and others alike
- a hope for flourishing current and new industries
- with fair and generous payment including retraining education for timber workers affected as has occurred in the Otways
- offering the state government carbon storage opportunities through conserving one of the world's best carbon holding forests region
- with park jobs as part of skilled good management - this national park will be of immense long term benefit.

There has to be a stop to the destruction through logging of the Mountain Ash Ecosystem in order to allow it to recover and fulfill once more its services to biodiversity and to human beings.

I am fully conscious I have not spelled out ways of progressing the Central Highlands Forests issue now and into the future but am also conscious of the work to this end already done, over many years. I expect this inquiry to use this work.

It is time for a radical new approach.

- It is time to take notice and act upon the work of scientists and their decades of research on the Central Highlands
- Time to take notice and act upon the work of dedicated and far seeing environment groups, local, state and national
- Time to take notice and act upon the clearly obvious future of wood supply in Victoria through crop wood in plantations and on private land, not through the clear-felling of native forests and their unique values.

In the current world, a world where native forest protection is increasingly valuable as climate change action, where there is strong call to preserve and end logging of current native forests and increase tree cover on the planet, it is time for a radical new approach in our own state.

The RFA has failed the Mountain Ash and other ecosystems of the Central Highlands. I do not believe at this late stage, with so much failure over the last 20 years, a continuation of clear fell logging under the RFA, even with changes, is viable and certainly not the way to go now or in the future. There is a far more positive approach in the implementation of a Great Forest National Park.

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]