

Wombat Forestcare Inc

Submission to RFA review

Victoria's forests provide for conservation of both threatened and common indigenous species, water production, carbon capture, recreation and tourism. There is a need to transition timber production to plantations.

The RFAs have failed to provide protection of threatened species, protection of rain forests and certainty for the forest industry. The RFAs should be cancelled, and failing that, any new RFAs should be a plan to transition out of native forest logging. The EPBC exemption should not be rolled over.

If the EPBC exemption is continued, there needs to be clauses that force the state government to protect threatened species and penalties should be imposed if this does not occur.

Our submission is mainly concerned with the West RFA, where there has been an historic over-estimation of the sustainable yield, and sustainable yield figures for the west forests, published by VicForests would be impossible to achieve.

If harvesting licenses were given based on these sustainable yield figures, it is most likely that after a few years, the government would be forced to pay compensation due to an inability to supply the licence commitments.

In the Wombat State Forest, an internal review made it very clear that the government would not be able to supply its licence commitments and the local mill took an exit package in 2005.

During the logging of the Wombat Forest, coupes were reseeded with eucalyptus species, and never thinned, resulting in thick regrowth that has greatly increased the fire risk.

At Mt Cole/Mt Lonarch and the Pyrenees, in approx. 2003 the timber harvesting licence was bought back due to an inability by the state government to supply the licence commitment. In approx. 2014, the same mill, operating under a different name was issued a new licence by the state government.

The area covered by the West Forest RFAs is some of the most cleared of native vegetation in Victoria and the small areas of remaining public land are vital for conservation of biodiversity. These areas will not sustain a logging industry.

The timber industry in the west of Victoria is not commercially viable. The total revenue from western forests in 2017-18 was \$700,000 and the state governments subsidy for western "Community Forestry" was \$678,000, leaving a very small profit of \$22,000. This does not take into account the biodiversity loss that occurs when the forests are logged, nor the additional water required by a regrowth forest.

There are many legal requirements of the West RFA that have not been met.

- The CAR system has not been delivered by the RFAs, with any public land that has been reserved being due to VEAC investigations or as in the case of Cobboboonee National Park, a department decision.
- Feral pests and plant programs have not been delivered.
- The Midlands FMP was not reviewed in 2005

- All reviews have been late.

We consider that the west RFA has failed to meet their objectives and that we cannot trust that any undertakings made in the proposed rolling over of the RFA would be adhered to by the state government.

The RFAs committed to:

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

The RFAs have failed to meet these commitments and all the RFAs should be allowed to expire. A plan to transition from native forest harvesting should be initiated.

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