

## Submission to the Victorian RFA Modernisation Process

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Dear Sir/Madam,

I would like to make the following comments on the RFA modernization process using the themes identified in the independent consultation paper.

### **Ecologically Sustainable Forest Management**

The principle of ecologically sustainable forest management should apply to all of Victoria's forests regardless of their current land classification or tenure. This includes forests currently in parks and reserves. Climate change is the major threat to Victoria's forests and being in a reserve will not protect them from its impact any more than the Great Barrier Reef Marine Park will protect the Barrier Reef from its effects. Achieving ecological sustainability in the face of climate change requires active management.

Currently Victoria's parks and reserves are passively managed with natural processes allowed to run their course with minimal human intervention. Unfortunately, the speed that climate change is occurring is well beyond the ability of our natural environment to cope with and we will only be able to retain at least a semblance of present biodiversity if we actively manage our native forests. Actively managing our forests also needs to start now. Leaving it until the impacts of climate change become obvious (all the trees start dying) otherwise it will be too late; not just for our forests but the wildlife and industries that depend on them.

Active management is not a new concept for Victoria. Fifty years ago, most Victorian forests were actively managed but with the focus on producing products for the Victorian public. These included timber, firewood, honey, and a wide range of other forest products. The sale of these forest products paid for the cost of managing the forests that produced them. There is technically no reason why the same management approach could not be used to deliver the full range of ecological services we need from our forests while also managing the impact of climate change without being a burden on Victorian taxpayers. This approach to managing forests is called multiple use forestry and is widely used in Europe, particularly in Scandinavian countries where forest base industries are a large part of their economies.

Active management includes controlling pest plants and animals, undertaking significant fire prevention works, aggressively suppressing bushfires and undertaking silvicultural works to maintain the health and vitality of key vegetation species. This last point is critical to reduce the impact of declining average rainfall on ecosystems. Active management is also costly and achieving the economic sustainability of managing Victoria's forest is critical to achieving ecological sustainability; an issue that the consultation paper failed to address. Multiple use forestry is the solution to achieving the ecological and economical sustainability of or forests.

An example of how active management can achieve both ecological and economic benefits is in the area of fire prevention. Current scientific and physical evidence shows that fuel reduction burning has minimal effect on the spread of bushfires. Research by respected fire behavior expert, Kevin Tolhurst, concluded that the effect of fuel reduction burning on the spread of bushfires largely disappears after 5 years whereas the average burning cycle is 12 years or longer. This fact was

clearly demonstrated by the fires in the Bunyip State Park this year; only 10 years after the area was devastated during Black Saturday.

The burning currently being conducted by Forest Fire Management Victoria (FFMVic) will not only be ineffective in preventing major fires but is often carried out at times of high soil dryness (drought index) resulting in the loss of huge numbers of mature habitat trees. Rather than use ineffective, expensive and destructive burning, an active management approach would adopt a program similar to the US Forest Service's Fuels for Schools program or Cal Fire's bioenergy program.

Under these programs fire hazards around communities and other significant assets are mechanically harvested rather than being burnt. The resulting harvested material is then supplied at cost to public institutions like school, hospitals, and universities as heating fuel. The result is fire agencies can deliver a higher standard of fire prevention to these communities at little or no cost, the public institutions reduce their operating costs and greenhouse gas emissions and the funds that were used on imported fossil fuels can now deliver more services and create local jobs. This approach is not weather dependent, has no risk of burn escapes, there is no smoke impact on people's health or crops and it allows habitat trees and other sensitive vegetation to be protected. The technology to efficiently harvest fire hazards is well proven and includes the Anderson Biobaler and the Gyro-Trac BBS-XP. Trialing such a program was a recommendation of the Lancefield Fire Inquiry but agencies have chosen not to adopt it.

The aggressive suppression of bushfires is another area where a different approach could deliver both ecological and economic benefits. There is a fundamental truth in fire management that states "the safest, most effective and efficient way to control large fires is to put them out while they are still small." Effective initial attack was, is and will remain the key to preventing major fires.

Unfortunately, the current agency focus seems to be on managing large fires rather than preventing them. The preoccupation with aircraft, particularly large aircraft, is indicative of this approach. Large aircraft like Sky Cranes or Large Air Tankers suffer from what I call the large aircraft paradox. Because they are so expensive, they aren't deployed to a fire until it's serious enough to justify the cost. By then it's too late for them to make any substantial difference in the spread of the fire. The recent Bunyip State Park fire is an example of this.

A better approach would be to use a low-cost firefighting system that allows local crews to contain fires much faster than they presently do. Such a system was successfully trialed in the Grampians in 2013. Ground applied retardant with a tracked carrier allows control lines to be established 10 to 30 times faster than currently achieved with dozers and tankers. Controlling fires much faster would result in fewer large fires with a corresponding reduction in the impact and cost of bushfires in Victoria. This trial was reported in the Hamilton Spectator of the 23<sup>rd</sup> November, 2013 and a detailed report submitted to DELWP by the Parks Victoria staff who conducted the trial. DELWP has yet to respond to that report or conduct any further trials of the system.

Another type of technology that would also help reduce the impact of bushfires are fire watch/weather cameras. Remote sensing technology like these cameras allow agencies to monitor areas that either don't have lookout coverage or at times when lookouts are not manned. The sooner fires are detected the higher the likelihood of successful initial attack. Monitoring local weather also allows fire planners to better predict fire behavior and would also assist with planning and response to other weather-related events such as flooding and wind storms. These cameras are now inexpensive to install and very reliable but to date state fire agencies haven't installed them.

### **The long-term stability of forests and forest industries**

Multiple use forestry and implementing active management of our forests will be the key to

ensuring their long-term stability and productivity. Stable and productive forests will support a stable and productive forest industry and reduce the cost of managing public land for the Victorian Government. If the management of our forests is world's best practice and supported by scientific research then they will continue to supply the full range of ecological services that the community needs. This approach can deliver both economic and environmental benefits for Victoria without compromising the ecological values of forests.

A practical example of this would be the removal of environmental weeds for use as bioenergy. The removal of the weed species would benefit the local ecology, the use of the removed vegetation as biofuel would reduce greenhouse gas emissions and create local jobs and the revenue from supplying the fuel would pay for the removal. The same would apply to managing fire and harvesting regrowth. Modern harvesting and forwarding equipment can undertake these types of operation with minimal disturbance to retained vegetation. Using modern harvesters and forwarders in saw log operations allows the use of the silvicultural system called single tree selection in the majority of Victoria's forest types. Single tree selection spreads harvesting over a wide area thereby minimizing its impact on other forest values. Modern equipment also allows these operations to be conducted safely and economically.

Diversifying the range of products and services obtained from our forests will also improve their long-term stability and support more forest-based industries. Producing high value specialty timbers and products is one obvious area of development. Understory species such as Blackwood, Silver Wattle, Sassafras and Satin Box along with tree burls, lignotubers and mistletoe bases are highly prized by specialty wood workers.

Silvicultural operations to improve the health of forests would also produce large amounts of biomass that can be used for renewable energy. This would create local jobs, reduce Victoria's greenhouse gas emissions and increase energy security. The use of biomass from native forest management is common practice in most OECD countries and a practice that Victoria not only should embrace but will need to if it is to economically maintain the viability of its forests and meet its target of zero net carbon emissions by 2050.

### **Governance and management of Victoria's forests**

The management of Victoria's forests is currently undertaken by multiple agencies using multiple pieces of legislation. Each agency has its own administration, processes and priorities. In short, it's a mess and small wonder that the public find it confusing. There seems little point in modernising Regional Forest Agreements if those agreements are going to be implemented by the current arrangement of agencies and legislation. The Victorian Government should use this review as an opportunity to modernise the legislation that underpins the management of Victoria's forests and restructure the organizations that enact it. What the public want is a single organization that will maintain the existing benefits and environmental values they currently receive from Victoria's forest in perpetuity. They want these benefits and values delivered by effective and efficient management that is sensitive to their needs. Without effective and efficient management there is little doubt that our forests will succumb to the effects of climate change.

The type of organization that could deliver the most effective and efficient management of our forests would have a very flat structure with most its resources based in the field. It would be based on geographical areas or districts covering specific parcels of forest/public land and align with two or three local government areas (LGA's) within the existing regions. The district office/depot would be located as close as practical to the forest areas minimizing response times and maximizing staff hours in the field. Each district would have its own administration support staff. This may seem

inefficient by these staff can fill vital support roles during fire emergencies and by working closely with field staff they gain a good understanding of the district and its operations. This would allow them to provide better support to field staff and more effectively handle public inquiries. Each district would have its own community advisory group that would provide advice and feedback to district staff on local operations and issues.

Above the districts there would be a regional office consisting of a regional manager and a small number of support staff. The role of the regional manager would be to oversee and support the operation of the districts and ensure organizational policies and procedures are being carried out. The regional manager would act as a conduit between the districts and head office.

The head office would develop statewide policies and procedures in line with government priorities. It would develop and support the delivery of statewide programs and co-ordinate central purchasing. A state reference group would provide advice and feedback to senior management on departmental operations and issues.

The advantages of having a flat structure with most resources in the field are the ability for the organization to respond rapidly to emergencies and any operational issues are fed very quickly to senior management. This means issues are dealt with quickly before they become a problem for government.

### **Conclusion**

The Victorian Government must use the review of Regional Forest Agreements to deliver radical change to the way our forests are managed. Active management of all Victorian forests as soon as possible is essential if the impact of climate change is to be avoided. Failure to do so will result in the loss of our forests along with the wildlife and industries that depend on them.

Yours sincerely,

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