30 June 2019



Department of Environment, Land, Water and Planning



REGARDING: PROPOSED MODERNISATION OF THE VICTORIAN REGIONAL FOREST AGREEMENTS

To whom it may concern,

The Regional Forest Agreements (RFAs) purported to guarantee long term security to the timber industry, whilst allowing for ecologically sustainable forest management, two objectives that are arguably mutually exclusive. My experience of the RFAs in operation in Western Victoria is that they have unfairly favoured the timber industry whilst failing to protect public ecological assets and the interests of the wider community. The Victorian and Federal Government need to bring an end to the special treatment of the timber industry enshrined in the RFAs, which should now be allowed to permanently expire. The Federal and State Governments should focus instead on putting forward a clear vision and policy for the management of threatened species, and the phasing out of timber harvesting in native forests.

Whilst the RFAs claim to protect threatened species, the ecological criteria and represented area targets are now outdated and in urgent need of review. Meanwhile the number of forest-dependent threatened species continues to steadily rise. To the existing stressors of population growth, urban encroachment and deforestation, climate change will most likely add unpredictable weather patterns, drought, invasive species and disease. In addition, the ever-present threat of bushfire could potentially compromise large areas of native forest. If already damaged by logging, the ability of bushland to adapt and recover would be greatly reduced or lost.

Given that we do not even know what the condition of our forests will be like in 20 years, how can the Victorian and Federal Governments possibly guarantee the ability of the forests to support a logging industry over the long term? Given the current circumstances, sanctioning the active and deliberate destruction of native forest that take 100+ years to regenerate is short-sighted and irresponsible at best. Rather the Government should be actively working towards improving the resilience of native forests and implementing mechanisms to mitigate climate change, including undertaking restoration, addressing habitat fragmentation and actively engaging private landholders in the conservation of native forests.

As noted in the Independent Consultation Paper, forest ecosystems play a vital role in carbon storage, and will most likely prove to be an integral part of any kind of holistic climate regulation strategy. The coming decades will bring many environmental challenges, which will demand responsiveness and constant adaptation on the part of Government. The last thing the Victorian public needs is to be locked into a 20 year agreement committing to the logging of native forests, without the need for proper assessment of threatened species or adherence to national environment protection laws.

In fact, the renewal of RFAs would send a clear message to the public that the Victorian Government is determined to prop up, at any cost, an already flailing timber industry, which will arguably become increasingly unviable as the effects of climate change worsen. As the Independent Consultation Paper states:

"...sustainable harvest levels have been reduced by more than 50% over the past decade. These reductions have occurred due to the impacts of unexpected events, such as major landscape level bushfires and Leadbeater's possum discoveries" (p.25).

In what other industry is the Government beholden to provide a small section of the community with jobs for the next 20 years? Every day in numerous other industries that are found to be economically unsustainable, people are routinely expected to absorb major changes, adapt, innovate and move on. For instance, consider the many people and businesses impacted by the loss of the car industry. Why then is it necessary to prop up the redundant practice of timber harvesting in native forests, which is highly destructive to our wildlife and ecosystems?

The RFAs have given the timber industry no incentive to innovate or move to more sustainable practices, but have allowed it to remain entrenched in the dark age of clear fell logging, which is a discredited and destructive practice. The RFAs also defer the need for long overdue discussion about the role that timber plantations can play in the future of the timber products industry.

The Victorian government is responsible for enacting legislation to protect the environment, but at the same time maintains a vested interest in the timber industry through the operation of VicForests, a state owned enterprise undertaking the commercial harvesting and sale of timber. This calls into question the Victorian Government's ability to manage forests in an open and transparent way, or make objective decisions on behalf of the Victorian people. Prior to any major policy decisions, the Victorian Government should divest itself of VicForests to remove this outrageous conflict of interest. It is irresponsible to support jobs in an unviable industry, let alone an industry that destroys the environment and acts against the interests of most citizens.

Furthermore the special benefits that the RFAs give to the timber industry actively punish other forest industries which depend on healthy forests. Industries such as water catchment, carbon storage, apiary and tourism have the ongoing potential to generate far greater revenue and jobs, and do not destroy the environment. As the Independent Consultation Paper outlines, there were 42.3 million visitors to state and national parks in 2016-17, generating an estimated \$1 billion Gross Value Added and 14 000 jobs for the Victorian economy, compared to the cited 100 million per year generated as a result of timber harvesting in native forests, a figure that does not even account for the running cost to the Victorian Government (p.29).

Tourism is an industry with virtually infinite potential, especially in the face of a growing population, seeking refuge in green spaces. In Western Victoria, one of most cleared landscapes in the country, there is considerable pressure and demand on the few scraps of native forest that we have left, especially the Grampians National Park. Other State Parks and State Forests such as Mt Buangor State Park and Mt Cole State Forest have also begun to enjoy strong patronage by local, interstate

and international visitors. With some investment in infrastructure, and ideally National Park status, such parks have the potential to achieve comparable tourism status and as well as help disperse the tourism load.

Given the enormous tourism potential of Mt Buangor/Mt Cole, I have been shocked and appalled to witness the aggressive clear fell logging occurring in Mt Cole State Forest, particularly since this is being undertaken immediately adjacent to the renowned Beeripmo hiking trail. Within viewing distance of the trail one can now witness the realities of clear-fell logging first hand; a completely overturned site devoid of any vegetation, with the exception of one solitary tree marked 'H.' Far from representing best practice, this is a typical example of the cynical and careless 'tick the box' approach to timber harvesting that has been allowed to occur under the RFAs.

Timber harvesting in native forests simply does not make any economic sense. It is based on an outmoded pioneering mindset that Victorians are entitled to earn a living from public land, and to remove natural assets for their own personal benefit. In fact people do not have any rights to public land, except for those given to them by Government, and these should reflect the broader public interest.

Victoria would benefit from adopting a more nuanced and sensitive view of the environment, whereby not all values must be counted in dollars and cents. There are many intangible benefits to revitalising damaged ecosystems and preserving natural assets that have not yet been properly articulated, including the role of forests in quality of life and mental health, and our well-being as a society. The forests also have a role to play in social cohesion and cultural heritage conservation through the active participation of Traditional Owners, who should be meaningfully engaged and employed in the management of our native forests.

The RFAs have failed to protect the security of timber supply for one simple reason. There is no security in the forest resource because there is no longer any security in the future of our forests. Given that our parks and wildlife will already be subject to numerous threats over the next 20 years, most of which will be exacerbated by climate change, the conversation should not be about modernisation of the RFAs, but whether it is responsible to have a timber harvesting industry at all. If the Federal and Victorian Government are brave enough to decide that our forests are worth preserving for the future and well-being of all Victorians, then there will be no need for such a legislative relic as the RFA. Instead resources can be concentrated on highly productive industries such as tourism, and on earnest efforts to combat climate change, habitat fragmentation and species extinction.

Yours faithfully,