Written submission for the Modernisation of the Victorian Regional Forest Agreements (RFA)

From: Australian Conservation Foundation Macnamara Community Group

Represented by

The Australian Conservation Foundation Macnamara Community Group is a community-based group who are very concerned about the impacts of climate change on the natural world. We know that more needs to be done to reduce deforestation across Australia, given that Australia is the only developed nation in the world's top ten major deforestation fronts (WWF Living Forests Report 2015).

Stopping logging of old growth and high value forests in Victoria is a vital step in reducing carbon emissions, improving soil and water quality and implementing measures to halt the devastating decline in native species in Australia.

We feel that the RFAs are failing to address the three primary objectives they were set up for and as such, need to be cancelled.

1. Comprehensive, Adequate and Representative reserve system

There is not a comprehensive amount of native forest available in Victoria. Many of the remaining areas are fragmented and are inadequate to maintain viable populations of naïve plants and animals. Several types of native grasslands and woodland areas are not found in sufficient size to be able to sustain viable native populations of vulnerable and threatened species. With so little forest areas left, what remains need to be protected to the highest level.

2. Ecologically sustainable management and use of forests

The continued destruction of old growth forests in Victoria is inexcusable. VicForests do not complete surveys in areas of significant value, even though it is required by law. VicForests are not abiding by the laws of Victoria (or Federal laws) and killing threatened species such as potoroos and leadbeater possums by not undertaking appropriate surveying and then clear-felling their habitat and conducting intense burns. Not fulfilling requirements to identify species in proposed coops is in direct contravention of these laws and shows that VicForests are not capable of effectively managing this incredibly valuable resource. VicForests have had to be taken to court five times (and lost five times) because they contravened these laws. It is incredibly disappointing that VicForests, a government-controlled entity, have not learned from any of their court appearance and in fact have continued to blatantly disregard the rules put in place to protect Victoria's unique forest areas.

Furthermore, VicForests has logged an area in Gippsland designated for a world-renowned walking track. They have clearly demonstrated that they cannot be trusted to continue management of these nationally significant habitats on behalf of the people of Victoria.

The Environment Protection and Biodiversity Conservation Act 1999 should be enforced in all forests in Victoria. The existing laws need to be strengthened, more strongly enforced, and the penalties for organisations and governments who contravene these laws should be significantly increased as well as criminal charges being considered as a deterrent.

The individuals, businesses, corporations and elected officials who continue to disregard the rules put in place to protect our heritage, our native habitats and our collective future need to be held to account. VicForests have proven that they are incapable of effective management of these forests and the Department of Environment, Land, Water and Planning has failed to appropriately regulate them or hold them to account on the significant number of breaches. As such, the RFA can not be allowed to continue.

3. Long-term stability of forests and forest industries within the Victorian RFA regions

In order to have stability of the native forests in Victoria, there can be no logging industry.

Tourism and other forest-based industries should be encouraged.

There is more than enough plantation-based timber in Victoria for a diminishing logging industry (and reduced demand world-wide). Plantation timber on private land has much less conservation value and is a much more efficient and sensible option compared with destroying old growth and high-value forest areas.

Other factors are now significantly more important that wood chips. Deforestation is a primary contributor to increased release of carbon into the atmosphere. It also negatively impacts on our water storage and water security as well as on the continued decimation of native species across the forest reserves. It will be vital to the sequestration of carbon and the ongoing sustainability of human habitation in Victoria, to maintain carbon sinks in national parks and forest regions. Living forests provide proven carbon capture and are more economical than technology that has yet to be created.

At present, logging in East Gippsland loses \$5.5 million per year. A 2016 Pricewaterhouse Coopers (PwC) economic report concluded that "continued native forest logging is uneconomic and that support for other industries, including plantation forestry and tourism would generate greater returns." Taxpayers are paying to have our old growth forests and critically endangers species destroyed for a few hundred jobs, that could be transitioned into other forest-based industries, including plantation timber. The funds saved from not investing in an uneconomic industry could be put into developing more economic alternatives and transitioning the remaining workers.

More severe bushfire seasons, worsening droughts and the combined impacts of climate change have been ignored. Even the departments own independent report highlights that "concerns remain within the community about the effectiveness of the management of forest-dependent threatened species and habitats. Invasive species, fire and climate change, as well as the interaction between these three factors remain ongoing and serious challenges for forest health in Victoria." At no point have any of these factors been considered despite their enormous impact on Victoria's forests.

The Departments report clearly identifies that more effort is needed to stop the overall decline of forest-dependent threatened species and improve the extent and condition of forest habitats. An independent PWC report has shown that the industry is uneconomical. VicForests have continued to demonstrate that they do not value or abide by the laws and rules in place to regulate effective land management. Therefore, the government must take decisive steps to reduce the loss of biodiversity across the state and act now to revoke all the Regional Forest Agreements and stop logging of native timber in all areas of Victoria.