

Submission to Engage Victoria on the RFAs.

The overarching goal of the Regional Forest Agreements was and should remain the ecologically sustainable management of Australia's forests.

I disagree with the statement in the Consultation Paper that the CAR reserve system is satisfactory.

The CAR reserve system was scientifically based upon bioregional units and this should be the underlying principle.

However, the RFAs failed to deliver this by

1. Not making enough reserves
2. Defining arbitrary areas for the calculation of the CAR reserve systems and ignoring the scientific bioregional basis for them.

Example: In the Strzelecki Ranges Bioregion less than 2% is formally reserved. This is a disgrace and does not bode well for ecological sustainability. This sort of blatant overlooking of the principles needs to be addressed.

Logging should be banned from bioregions which do not have a bioregional CAR reserve system.

**Reserves and Protection:** Most of the categories of reserves in Victoria do not protect forest from logging or protect the forest long term. Many reserves are merely Section 50 reserves under the Forests Act or just forest with an SPZ overlay, both of which can be removed on the advice of the Minister.

All Section 50 reserves and SPZ areas should be included in the national park system for best protection.

I can't see the logic of allowing Section 50 reserves to be counted as part of the reserve system, when they do not prohibit logging.

**Native Forest being used as Plantation:**

Another issue in the Strzelecki Ranges Bioregion which needs to be addressed is the misrepresentation of 7,000 hectares of native forest as plantation and the leasing of this along with 20,000 hectares of additional native forest to Hancock Victorian Plantations in 1998. This occurred in the middle of the Gippsland RFA process. How was allowed? How was this RFA able to be signed in those circumstances? The RFA papers mentioned that the Strzelecki Ranges were to be referred to VEAC, but that did not occur either. This means that much of the Strzelecki State Forest does not even have the protection that the RFA and the Forests Act gives to other state forests.

In 2008 an inquiry by the Ombudsman brought to light *The Review of Victorian Plantations Corporation Vested Lands 1993* by the Land Conservation Council. This report confirmed community fears that 7,000 hectares of native forest reforestation in the Strzelecki State Forest has been misclassified as plantation. These areas are still being treated as intensive plantation. This practice of converting state forest to plantation has been banned in Victoria since 1986. Subsequent RFA reviews have done nothing to restore native forest status to these areas.

**Other measures** which could assist ecological sustainability across Australia would be the ending of native forest logging industry's exemption from national environment law, the strengthening of

management prescriptions for threatened species and communities and substantial additions to the formal reserve system.