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Victorian National Parks Association (VNPA)
Submission on Victorian Regional Forest Agreements
29 January 2018

Overview

Regional Forest Agreements (RFAs) are twenty-year-long agreements between the Victorian and Commonwealth Governments which give special treatment to the native forest industry.

There are five RFAs in Victoria. They start expiring from March 2018.

- East Gippsland (signed 3 February 1997)
- Central Highlands (signed 27 March 1998)
- North East (signed 9 August 1999)
- West Victoria – west of the Hume Highway to the South Australian border (signed 31 March 2000)
- Gippsland (signed 31 March 2000)

The looming expiry of the RFAs offers a once-in-two-decades opportunity to put in place modern, improved and transparent arrangements for the management of Victoria's publicly owned native state forests – arrangements based on current science, and on community views about how our state forests should be valued, used and managed.

The so-called 'mandatory' five-yearly reviews of the RFAs do not even cover contemporary issues and are largely a matter of 'tick the boxes'. They are retrospective exercises that cover the period of implementation of the RFAs between 1 July 2009 and 30 June 2014, which is now well in the past. Even when it is acknowledged that there have been breaches or that work has not been completed, there are no recommendations, no alternatives offered, and no consequences or accountability measures outlined.

Native forest logging, which is strongly contested, is based on conflicting and outdated information and concepts. In many ways, an appropriately constituted judicial and expert review of native forest management would be a fairer process, if a review is undertaken at all.

The key commitment of the Victorian and Australian Governments outlined in the review document is: *"The Victorian and Australian Governments are committed to ensuring the Victorian RFAs are durable and that the obligations and commitments that they contain are delivered to ensure effective conservation, forest management and forest industry outcomes." (Emphasis added).*

On studying the review document and the outcomes of previous reviews, it is difficult to take the joint government commitment to "effective" conservation, forest management seriously.

In this submission, we outline ten reasons why the RFAs have failed, are now obsolete and should not be renewed. These are:

- 1. RFAs have failed to meet their objectives**
- 2. The ecological targets of the RFAs are out of date**
- 3. RFAs are a regulatory relic**
- 4. The RFAs ignore climate change implications**
- 5. RFAs do not effectively manage threatened species and ecosystems**
- 6. The RFAs ignore fire impacts**
- 7. RFAs ignore other forest values**
- 8. RFA reviews ignore their own previous recommendations**
- 9. RFAs give unjustified and unfair special treatment to native forest logging**
- 10. The RFAs stifle industry innovation**

The five Victorian RFAs must be allowed to expire, and not be extended or rolled over. Right now, there is a woefully overdue but legally mandated five-yearly review of Victoria's five RFAs under way.

This overdue review should recommend that the RFAs be abandoned, and at a minimum bring to an end the special treatment this industry enjoys under the RFAs by:

- ending the regulatory relic which is the Western Regional Forest Agreement, and comprehensively reviewing proposed logging plans;
- discontinuing the industry's exemption from national environment laws in all RFAs;
- accounting for other forest-dependent industries—such as conservation, recreation, tourism, agriculture, water, and carbon storage – in any arrangement or agreements going forward;
- strengthening management prescriptions for threatened species, climate change impacts, and fire;
- making substantial additions to the formal reserve system.

Ten reasons why RFAs have failed and should be abandoned.

1 RFAs have failed to meet their objectives

None of the Victorian RFAs have met their objectives. The numbers of forest-dependent species listed as threatened continue to rise, and forest health, which is declining, will only get worse under climate change. Even the native forest industry is stagnating and in decline as its main resource runs out or is reduced through landscape-scale fire. <https://vnpa.org.au/victorias-forests-are-not-magic-puddings/>

In 2016, our sister organisation, the NSW National Parks Association, published a review of RFAs in NSW and asked whether they had met their higher-level aims (Sweeney 2016). Although focused specifically on NSW, this review included much information from Victoria and is therefore relevant to this consultation. The NSW Association found that the RFAs have failed to meet their higher level aims, and provided extensive evidence to demonstrate this. <https://npansw.org/wp-content/uploads/2017/12/Regional-Forest-Agreements-Report- web.pdf>

A comprehensive report produced by environmental lawyers on the RFAs found that:

“RFAs have never delivered the benefits claimed for them, for a mix of political, economic, cultural and legal reasons. From a legal perspective, the main reason the RFAs have failed is that the States do not take the regulatory and legal actions required to adequately protect matters of national significance.”

https://envirojustice.org.au/sites/default/files/files/Submissions%20and%20reports/One_Stop_Cho p.pdf

2. RFA's ecological targets are out of date

Many of the RFAs' standards for the protection of ecosystems fall below international and national benchmarks. For example, elements of the JANIS criteria embedded in the RFAs are inconsistent with the National Reserve System (NRS) Strategy adopted by all Australian Governments in 2009, and the Convention on Biological Diversity (CBD) Aichi Biodiversity Targets (specifically Target 11), adopted in 2010.

The JANIS targets for inclusion of ecosystems within the forest reserve system are:

- 15 per cent of the pre-1750 distribution of each vegetation type
- at least 60 per cent of the remaining extent of vulnerable ecosystems. A 'vulnerable'

ecosystem is one that has been reduced by around 70 per cent within a bioregion and remains subject to threatening processes, or is not depleted but is subject to continuing or significant threatening processes.

- all remaining rare and endangered forest ecosystems. A 'rare' ecosystem has a small range of less than 10,000 hectares, or occupies a total combined area of less than 1,000 hectares, or occurs in isolated patches of less than 100 hectares. 'Endangered' ecosystems have been reduced to less than 10 per cent of their former range or have 90 per cent of the area in small, threatened patches.

The national policy framework for building the NRS was updated in 2009. This strategy identifies priority actions to provide a nationally coordinated approach, including the following national targets for a national reserve system:

- examples of at least 80 per cent of all regional ecosystems in each bioregion by 2015
- examples of at least 80 per cent of all regional ecosystems in each subregion by 2025
- core areas established for the long-term survival of threatened ecosystems and threatened species habitats in each of Australia's bioregions by 2030
- critical areas for climate change resilience, such as refugia, to act as core lands for broader, whole-of-landscape scale approaches to biodiversity conservation by 2030.

In 2010, at the tenth meeting of signatories to the Convention on Biological Diversity in Nagoya (Japan), a revised strategic plan for biodiversity in the 2011-2020 period was adopted. This plan is often referred to as the Aichi Biodiversity Targets. Target 11 is particularly relevant to protected areas:

By 2020, at least 17 per cent of terrestrial and inland water areas and 10 per cent of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem services, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscape and seascape.

In summary, there has been a trend from relatively specific targets towards those that are less well defined, i.e. from numerical targets applying to ecosystems in Australian forests (JANIS targets) to 'well-connected' protected areas applying to bioregions across the globe (Aichi targets).

While the current expression of targets has merit, in that it explicitly acknowledges the need for connectivity and integration into the wider landscape, there is also a need for the broader targets to be translated to concrete and specific targets for their application.

http://www.veac.vic.gov.au/documents/SAPL%20Discussion%20Paper_online_o.pdf.

The current review document argues (page 27) that: "...as reported in the previous five-yearly review report, it is not possible to compare the current level of protection of EVC and old-growth forest values in each RFA region with the level of protection in place when the RFAs were signed, as improvements in knowledge and technology over the review period mean that the inputs (pre-1750 and current typology and extent of EVCs, modelled old-growth estimates, and mapping of public land boundaries) have changed."

The same argument can be applied to the definition of what is CAR (comprehensive, adequate and representative) - that is, the definition has been superseded, both globally and nationally, by new standards and targets. If a higher level criterion, such as the Aichi target, were applied, significant areas would need to be added to the formal reserve system. For example, according to analysis in a

supplement to the VEAC Public Land Discussion Paper, there are is a “shortfall” of approximately 205,047 ha on public land in the South West cluster of bioregions, which would include areas of the Portland, Horsham and potentially Midlands FMAs. (Page 23.)

<http://www.veac.vic.gov.au/documents/supplement.pdf>

3. RFAs are a regulatory relic

Many people think that the Western Victoria Regional Forest Agreement was phased out after the historic decision by the Bracks Government to create the Great Otway National Park in 2005, which largely ended broad-scale commercial logging in the area. Yet the agreement still exists, and is still part of the current review.

Even the last independent review, in 2010, recommended that the Western RFA be cancelled, but as recently as mid-2017, revised ecologically-damaging logging plans were released for targeted logging of woodlands right across the West. This includes around the Grampians, the Wombat forest near Daylesford, and Mt Cole west of Ballarat. Key features of this plan include:

- It will target around 60 areas of state forest and apply in areas known to contain more than 20 threatened native animals and 14 threatened native plants.
- Across western Victorian forests, 70% of the area targeted for logging contains native vegetation types that are either endangered (19%), vulnerable (11%) or depleted (40%). In the Horsham Forest Management Area, 54% of the vegetation is endangered.
- Threatened species have been found either within or near 33% of planned logging coupes, with an even higher percentage in some regions.

You can see the detailed [VNPA analysis here](#).

According to the most recent 2016 -2017 VicForests annual report, total revenue for so-called Western “community forestry” operations was approximately \$773,000 – that is, less than a million dollars, yet with potential damage for large areas of scarce and fragmented publicly-owned native forest.

<http://www.vicforests.com.au/static/uploads/files/updated-vicforests-2016-17-annual-report-wftfqgsbjtfz.pdf>

To put this into context, the Victoria Government invested \$6.4 million in the Wimmera Catchment Management Authority, and the Federal Government \$1.8 million, in 2016-2017 (this is a similar area to the Horsham Forest Management Area). In the same year, the Wimmera CMA undertook 456 ha of vegetation works including extensive revegetation and other enhancement measures (on private land), while the other forward plan for forestry in the region covers 13,250 ha in 26 state forests.

While the focus of the CMA is private land and waterway focused, its key role in local biodiversity conservation and waterway management is undermined by the damage done by even small-scale logging in some of the very fragmented public land blocks in these regions – which are some of the most cleared landscapes in Australia. This makes neither ecological nor economic sense, and is poor use of public funds and public land.

The current Review document states: “At signing, the then Australian and Victorian governments agreed that ecologically sustainable forest management is an objective which requires a long-term commitment to continuous improvement and that the key elements for achieving it are the establishment of a CAR reserve system, the development of internationally competitive forest

products industries, and the implementation of a fully integrated, strategic, and adaptive forest management system." (Emphasis added.)

The VicForests Draft Ecologically Sustainable Forest Management Plan is a superficial and deeply flawed document – see <http://www.vicforests.com.au/static/uploads/files/esfmp-v2-0-working-draft-wfkzagowufoe.pdf>. This is particularly illustrated in Appendix 3 - High Conservation Values strategy, which is almost entirely focused on some issues associated with the east of the state. Although even in the east the HCV strategy is best described as minimal, it is even more so in the west.

For example, the objective of "*HCV 1: Forest areas containing globally, nationally or regionally significant concentrations of biodiversity values (e.g., endemism, endangered species, refugia)*", lists only four species – Leadbeater's Possum, Spot-Tailed Quoll, Long-Footed Potoroo and Smoky Mouse. Only the Spot-Tailed Quoll occurs in some parts of Western Victoria, and a further 13 species (14 in total, both plants and animals) are listed under national environmental laws which occur within or adjacent to planned coupes in western Victoria. These are not mentioned in the Vic Forest High Conservation Value Strategy.

Likewise "*HCV 3: Forest areas that are in or contain rare, threatened or endangered ecosystems*, only lists rainforests and old growth forest as values identified, when in fact) across western Victorian forests, 70% of the area targeted for logging contains native vegetation types that are either endangered (19%), vulnerable (11%) or depleted (40%). In the Horsham Forest Management Area 54% of the vegetation in planned logging coupes is endangered.

Again "*HCV 4: Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control)*", largely ignores critical water supply catchments in the (much drier) west.

4. RFAis ignore climate change implications

The agreements do not even mention climate change and its potential impacts. Yet climate change is recognised as a new stressor that adds to, and interacts with, a range of existing stressors that have already significantly changed and diminished Australia's biodiversity. ⁱ

At a national level, the most important proximate drivers of change in Australia's biodiversity that will interact with climate change are considered to include:

- loss and fragmentation of habitat associated with land clearing
- redistribution of water resources
- changes in nutrient distributions in soil and water
- changes in fire regimes, mining and salinity
- the introduction of exotic species and diseases.ⁱⁱ

The Victorian Environmental Assessment Council Fibre and Wood Supply Assessment 2017, Appendix A Consultants' report (<http://www.veac.vic.gov.au/documents/Appendix%20A%20-%20Consultants'%20Report.pdf>) makes a series of points about the implication of climate change for wood supply.

The expert consultants find for Mountain Ash, the most valuable source of timber for the logging industry that:

- A 3°C increase in mean annual temperature (MAT) from 9.5°C to 12.5°C, which is consistent with expectations for MATs in south-eastern Victoria by the end of this century) leads to a reduction in the total number of trees (i.e. stand density) at a given mean tree diameter.
- A 3°C increase above current MAT leads to a decrease of 15% in tree volume per ha, although there is substantial variability among different stands.
- Future harvest volumes are expected to decline due to increasing MAT in south-eastern Australia. Current growth and yield models do not account for the potential reduction in future harvest volume
- The total area suitable for regeneration of mountain ash could decrease by up to 80% under a 3rd climate change scenario by 2080.

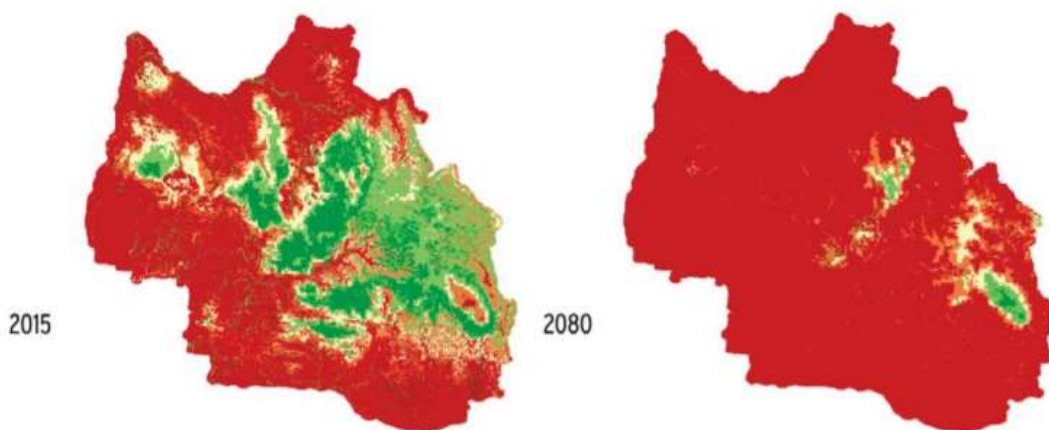


Figure 24: Regeneration suitability of mountain ash (*Eucalyptus regnans*) across the Central Highlands under current climate conditions (left panel) and a future climate that is 3°C warmer (right panel). The colour scale runs from unsuitable for natural regeneration (red) to well suited for natural regeneration (green). The total area suitable for regeneration of mountain ash decreases by ~80% between the two scenarios.

5. RFAs do not effectively manage threatened species and ecosystems

The obligation in the RFAs that “*The Commonwealth notes that its obligations to promote endangered species protection will involve ongoing cooperative work with Victorian agencies concerning the RFA region*”, contains no targets or outcomes for protection of threatened species, making the objective largely meaningless and ineffective. This is particularly relevant in the context that threatened species and ecosystem decline continue to increase.

In 2015, mountain ash forest, one of the key target species for logging, was listed as critically endangered on the International Union for the Conservation of Nature (IUCN) Red List of Ecosystems. Leadbeater’s possum has been up-listed to critically endangered, and the greater glider added to federal and state lists as vulnerable to extinction. While the RFAs have been in effect in East Gippsland, populations of the greater glider have declined by 50 per cent in that region.

In the central highlands there are clear indications of biodiversity decline:

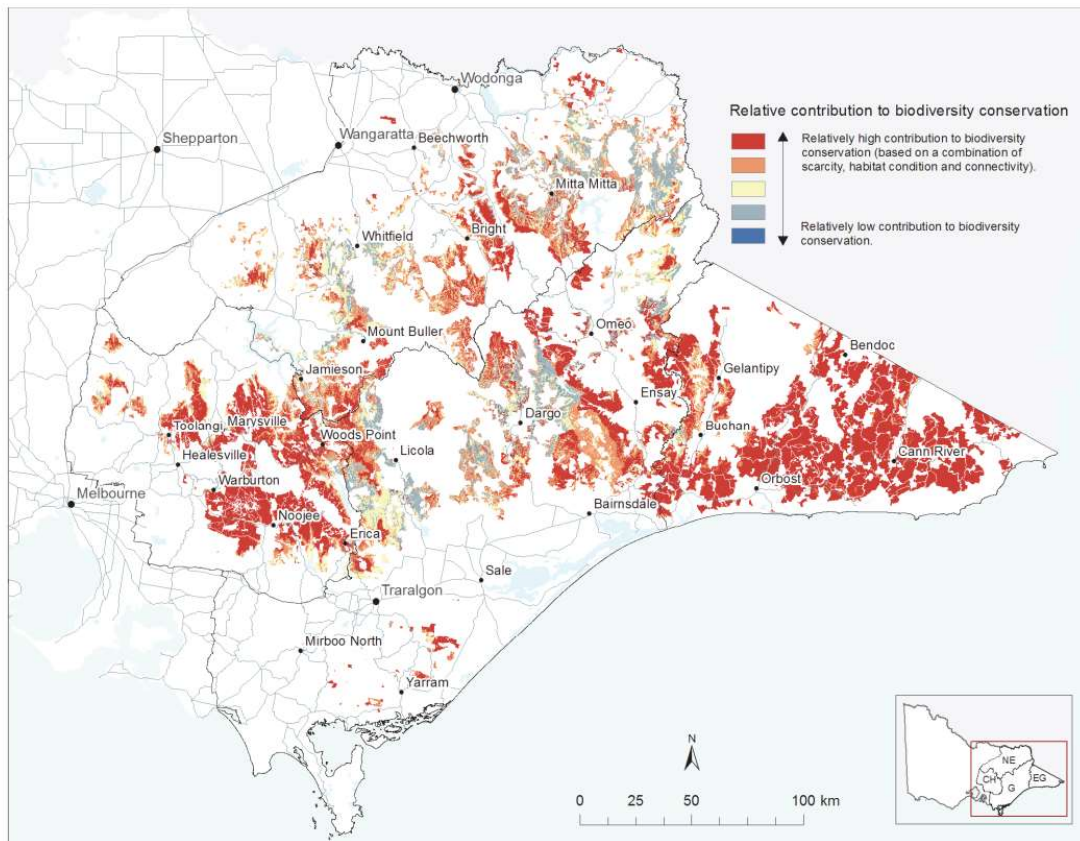
- an increase in the number of threatened species from 28 in 2000 to 38 in 2015, and in the severity of their threat category
- a decline in the number of arboreal marsupial animals
- a decline in the condition of habitat consisting of large, old, hollow-bearing trees within a complex forest structure.

https://tsrhub.worldsecuresystems.com/Ecosystem%20Summary%20Report_V3b_low.pdf

The recent Victorian Environmental Assessment Council assessment of the conservation value of state forests in the east of the state <http://www.veac.vic.gov.au/investigation/assessment-of-conservation-values-of-state-forests> found that:

- Of the 79 forest-dependent species looked at in the report, 12 are listed under Victoria’s threatened species laws. Timber harvesting is recognised legally as a threat to all but one of the 12, including the state’s faunal emblem, the critically endangered Leadbeater’s possum.
- Given the vulnerability of Leadbeater’s possum habitat to large, intense bushfires, the report warns it would be prudent to conserve *all* populations, rather than just those considered as “most important”.
- The assessment also has maps showing that areas making the highest contributions to forest biodiversity conservation for 79 threatened species also overlap with some of the most productive forests for timber harvesting. (see map below – Figure 2.5)

Figure 2.5 Results for broad forest species analysis – general and special management zones of state forest



The Report on Progress with Implementation of the Victorian Regional Forest Agreements (RFAs) Period 3: 2009-2014, November 2017, claim that “the Code of Practice for Timber Production 2007 (DSE 2007b) (Code) satisfactorily protects environmental and heritage values” (page 7) is hard to reconcile with the large numbers of reported breaches and the steady increase in numbers of threatened species.

A recent community report documents 27 cases where logging had already occurred or was imminently about to occur within areas that were required to be set aside for protected environmental values, such as a threatened species or rainforest.

In 2013, the then Victorian Government amended the Sustainable Forests (Timber) Act 2004 to essentially improve long-term resource security for the timber industry. In the process, the legal link between action statements and the Code of Forest Practice was effectively severed, making even Victorian threatened species laws such as the Flora and Fauna Guarantee Act Action Statements not directly relevant to timber harvesting, and further undermining any protection for threatened species and communities.

6. RFAs ignore fire impacts

RFAs ignore the successive or cumulative impact of bushfire, even though there have been extensive fires in the last 10 years. The issue of fire is complex, yet the RFAs ignore both the impact on extent and structure of the forest and also resource availability for industry.

Research on the 2009 Black Saturday fires showed that recent logging increased the probability of a crown fire in a range of forest typesⁱⁱⁱ. Logging can increase the susceptibility of moist forests—such as those found in all of the RFA regions—to fire via several factors^{iv}:

1. Altering the microclimate by removing the canopy
2. Altering stand structure and composition
3. Altering fuel characteristics (e.g. via adding fine fuel for ignition)
4. Increasing or altering ignition points (e.g. via road creation providing access to forests)
5. Altering the spatial pattern of stands which can influence fire spread.

Estimates from DELWP show that at least 40 – 60% of state forest has since 1960 already been logged or burnt or is proposed to be logged in next few years. Assuming that many of the easier and non-constrained areas of forest have been logged first, there is limited resource left, particularly if future fires are taken into account. There is no clear provision in the RFAs to consider the impacts or cumulative implications of these scales and rates of fire plus logging.

Regional Forest Agreement Area	State forest in RFA that has been logged since 1960 or is on TRP or has been burnt (ha)	State forest in RFA that has been logged since 1960 or is on TRP or has been burnt (%)
Central Highlands	177,271	44
East Gippsland	233,997	40
Gippsland	461,710	57
North East	320,118	46

The Victorian Environmental Assessment Council, Fibre and Wood Supply Assessment 2017, Appendix A Consultants' report <http://www.veac.vic.gov.au/documents/Appendix%20A%20-%20Consultants'%20Report.pdf> makes a series of points about the implication of fire for wood supply.

“The mean proportion of the commercially valuable 1939 regrowth ash forests from the Central Highlands that was lost in simulated fires over the next 20 years was 20%, ranging from 3-47%. These results were consistent with the historical data on fire activity”

“It is unclear how much, if any, buffer is included to account for unexpected future events, such as fires. The process by which these scenarios are aggregated, evaluated and analysed, and then

combined with other information to select a single annual sustainable harvest level, is not documented and is the least transparent part of the process.”

7. RFAs ignore other forest values

RFAs do not recognise, include or account for non-wood forest values (such as water, ecosystem services, recreation and tourism) that are contributing significant sums to the state’s economy, and could contribute further.

A study, ‘Experimental Ecosystem Accounts for the Central Highlands of Victoria - Summary document’ by Heather Keith, Michael Vardon, John Stein, Janet Stein and David Lindenmayer (July 2017), found that the value of key regional industries far outweighs that of the native timber industry. Their key findings include:

Key Findings



Economic contribution (Industry Value Added) of key regional industries substantially outweighs that of native timber harvesting in Victorian Central Highlands study area. Note: carbon sequestration is estimated as a potential value, as Federal Government regulation currently excludes native forests from the carbon market.

https://tsrhub.worldsecuresystems.com/Ecosystem%20Summary%20Report_V3b_low.pdf

According to an economic assessment by leading economic consultants the Nous Group, for an investment of just \$45 million, Victoria’s proposed Great Forest National Park would draw almost 380,000 extra visitors a year to the Central Highlands, add \$71 million annually to the local economy and generate 750 jobs with a little private investment.

Even without private investment, the government by simply declaring the national park, improving park infrastructure and visitor management, and establishing the Healesville-to-Eildon hiking trail, could generate 520 jobs, attract an extra 242,000 visitors a year and add \$48 million annually to the economy in 10 years’ time and growing

PROJECTS	ESTABLISHMENT COST ESTIMATES	ADDED ANNUAL ECONOMIC BENEFIT	ADDED JOBS	ADDED ANNUAL VISITORS
Establish national park, boundaries and management board, and conservation management	\$8.1 million	\$7.5 million	80 new jobs	24,000 extra
Improved facilities and visitor management, establish Healesville-to-Eildon hiking trail	\$17.9 million	\$31.1 million	440 new jobs	218,000 extra
Tree-top walk, zip-line and eco-lodge	\$19.2 million	\$22.5 million	240 new jobs	137,000 extra
TOTAL	\$45.2 million	\$71.1 million	760 new jobs	379,000 extra

<http://vnpa.org.au/wp-content/uploads/2017/02/Nous-GFNP-economic-contribution-study-3-February-2017.pdf>

8. RFA reviews ignore their own previous recommendations

Recommendations relating to improved threatened species outcomes from the previous RFA five-yearly review in 2009 have still not been complied with.

In 2010 the Independent Review on Progress with Implementation of the Victorian Regional Forest Agreements Final Report recommended: *‘There are a number of key issues that I have recommended the Parties consider for their continued implementation of the RFAs. The most critical of these is consideration of cancelling the West Victoria RFA...’*[~]

This has not occurred. The Joint government response to the earlier review (*a classic case of government double speak*) essentially defers this decision to the current review, which is also silent on the issue (see section 4. IMPLEMENTATION OF RECOMMENDATIONS FROM REVIEW PERIODS 1 & 2): *“The Parties recognise that there have been a number of changes to forest management in the West Victoria RFA region since the signing of the agreement in 2000. The Parties recognise that the West Victoria RFA is still serving its overarching purpose in relation to conservation and multiple use forests. The Parties agree that the West Victoria RFA will be administered by the Parties within the context of these changes and further agree to consider the need to amend the West Victoria RFA to reflect these changes. The Parties agree that any required amendments to the West Victoria RFA will be made as part of extension process for the Victorian RFAs”*

The comprehensive report produced by environmental lawyers on the RFAs found https://envirojustice.org.au/sites/default/files/files/Submissions%20and%20reports/One_Stop_Cho_p.pdf

“RFAs, and the forest management regimes accredited by the agreements, are not reviewed on time or with sufficient regularity, and when reviewed, the review is inadequate. Reviews have failed to ensure that the RFAs are being complied with and are responsive to new scientific data, changes in circumstances and any critique of their efficacy. The Australian Environment Act Report of the Independent Review of the Environment Protection and Biodiversity Conservation Act 1999: Final Report (the Hawke Review) 5 indicated that, in the absence of regular reviews and oversight, it is not possible to ensure that RFAs are meeting the necessary standards to justify the exclusion of RFA forestry operations from the normal operation of the EPBC Act”

The RFA Obligation is that “Parties agree that within five years pest plant and pest animal control programs will be developed in accordance with the relevant Forest Management Plan.”

The milestone in each RFA to develop pest plant and pest animal control programs has not been achieved.

For example, there has been no pest animal control in the Wombat State Forest, and minimal pest plant control. The Midlands Forest Management Plan (1996) outlines two actions that have not been acted upon:

“Prepare and implement three-year pest plant control programs for State forest in the Midland FMA based on the Guidelines for Control of Pest Plants and relevant legislation and policies.”

and

“Prepare and implement three-year pest animal control programs for State forest in the Midland FMA based on the Guidelines for Control of Pest Animal and relevant legislation and policies.”

There are many actions outlined in the Midlands Forest Management Plan (1996) regarding biodiversity conservation that have not been acted upon, and the commitment to rewrite the Midlands Forest Management Plan (1996) has not been accomplished.

The review document concludes that: “A review of the Forest Management Plan for the Midlands Forest Management Area (NRE 1996) was not undertaken during Period 3” - hence failing to comply. While this is acknowledged, there are no recommendations, no alternatives provided, no consequence or accountability measures outlined. This reinforces the ‘tick-the-box’ nature of these so-called reviews, as nothing changes, even if undertakings have not been complied with.

9. RFAs give unjustified and unfair special treatment to native forest logging

Most industries have to follow the law, yet RFAs ‘turn off’ national environmental laws.

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is the main piece of federal environmental legislation, yet the *Regional Forest Agreements Act 2002* provides that RFAs, and by extension the native forest industry, are exempt from the EPBC Act.

The comprehensive report produced by environmental lawyers on the RFAs found “...that protection of forests’ biodiversity and threatened species would be of a higher standard if regulated by the EPBC Act than under the RFA regime.”

https://envirojustice.org.au/sites/default/files/files/Submissions%20and%20reports/One_Stop_Cho_p.pdf

The exemption also creates double standards and unfair advantages. For example, an adjacent private landholder wishing to clear land or damage habitat would be required to seek approval under National Environmental laws, the bush adjacent owned by the public is not so required, if this bush is proposed to be logged.

To illustrate, 14 species listed under national environmental laws occur in planned coupes across the west RFA, including the SE Red-tailed Black-cockatoo, one of 20 priority bird species under the Australian Government’s Threatened Species Strategy. There are eight state forests with records of these birds in or adjacent to coupes in the Horsham FMA alone, yet these iconic birds will not get the levels of assessment and potential protection they deserve, if their habitat is a target for logging on the public side of the fence. You can see the detailed [VNPA analysis here](#).

10. The RFAs stifle industry innovation

The method of harvesting native forest, clearfell logging, has not changed significantly in 30 years yet has a dramatic impact on native habitats and drinking water production. The amount of sawn timber used in construction has dropped dramatically, and timber supply is shaky to the point that the Victorian Government had to buy out the state’s main native hardwood sawmill in 2017.

For example, assessments of silviculture systems from leading forestry academics produced for the Victorian Government in 2016 conclude that since 1997 and the introduction of the RFAs and associated legislative and policy changes there has been little change or innovation in the forest industry harvesting techniques. They note: “...clearfelling (in green forest and in burned forest as salvage logging) accounts for the majority of silvicultural systems employed in montane ash forests (~90% by area and number of coupes). It also shows that these patterns of silviculture differ little

from the previous twenty years (1977 – 1997), which confirms there have been no major shifts in the application of silviculture treatments in the last ~40 years. “

They conclude: *“As a result, there has been minimal change and adoption of alternative silvicultural techniques in Victoria’s ash forests in the last 40 years. Public controversy over harvesting has persisted, and concern for the impact of practices on biodiversity has escalated. ”^{vi}*

The history of logging in Victoria stretches well over 150 years, but it was the introduction of wood chipping and clear-felling through the 1970s and 80s that saw the community began to raise concerns about the rate of logging and the damage that was being done through the logging process. It is clear that the nature of timber harvesting – clear-fell logging - is one of the major drivers of controversy around native forest.

There is clear link between the stalling of research and innovation on silviculture (and probably other aspects of the native forest logging industry) and the signing of the RFAs and other legislative and policy reforms undertaken to support the industry at the state level. Essentially, the protected nature of the industry has entrenched a method of timber harvesting almost to the exclusion of all else, without the exploration of more ecologically or socially acceptable methods.

It should be noted that few businesses dependent on native forest are profitable, many make very small or neutral profits in the normal business sense, and many have also been recipients of extensive direct and indirect government support.

It is arguable that the RFAs’ attempt to increase industry security (many would argue at almost any cost) are in fact keeping industry in the past while destroying public ecological assets in the process, many of which would generate as much or more for the community. This will ultimately end in a lose- lose situation for all involved.

ⁱ Steffen W, Burbidge AA, Hughes L, Kitching R, Lindenmayer D, Musgrave W, Stafford Smith M, Werner PA (2009) Australia’s biodiversity and climate change: A strategic assessment of the vulnerability of Australia’s biodiversity to climate change, Report to the Natural Resource Management Ministerial Council commissioned by the Australian Government. CSIRO Publishing

ⁱⁱ Hughes L, Hobbs R, Hopkins A, McDonald J, Stafford Smith M, Steffen W, Williams S, 2010: *National climate change adaptation Research plan for terrestrial biodiversity*, National Climate Change Adaptation Research Facility, Gold Coast.

ⁱⁱⁱ Bradstock, R. A., and O. F. Price. 2014. Logging and Fire in Australian Forests: errors by Attiwill et al. (2014). *Conservation Letters* 7:419-420. & Price, O. F., and R. A. Bradstock. 2012. The efficacy of fuel treatment in mitigating property loss during wildfires: Insights from analysis of the severity of the catastrophic fires in 2009 in Victoria, Australia. *Journal of Environmental Management* 113:146-157.

^{iv} Lindenmayer, D. B., M. L. Hunter, P. J. Burton, and P. Gibbons. 2009. Effects of logging on fire regimes in moist forests. *Conservation Letters* 2:271-277.

^v Independent Review on Progress with Implementation of the Victorian Regional Forest Agreements (RFAs) Final Report, May 2010 www.daff.gov.au/_data/assets/pdf_file/0019/1803511/rfa-vic.pdf

^{vi} Thomas A. Fairman & Rodney J. Keenan, (2016) Review of Silvicultural Systems Project: Including commentary on applicability of 1997 report recommendations to 2016 Victorian forest management, School of Ecosystem & Forest Sciences, The University of Melbourne, produced for the Victorian Government, Forest Industry Taskforce