

GUIDE: RESPONDING TO THE ONLINE SURVEY ON THE WEST VICTORIA REGIONAL FOREST AGREEMENT

The Victorian and Commonwealth governments are seeking community input to inform the modernisation of the five Victorian Regional Forest Agreements.

It is important that the Andrews and Morrison governments hear communities' views on the failures and problems with renewing the West Victoria Regional Forest Agreement (Western RFA).

We have prepared this document to help you respond to the Victorian Government's online survey at engage.vic.gov.au/future-of-our-forests/rfa-consultation-paper

You can use the points provided below to inform your answers to the questions and raise concerns about the Western RFA. Cut and paste some of the relevant points, you can copy all or just a few, and feel free to add your own comments and experiences.

We hope to have a separate document for the eastern RFAs in the coming weeks.

WHY IS THIS IMPORTANT?

The Western Regional Forest Agreement, set up almost 20 years ago, is an agreement between the state and federal governments that mostly deals with commercial native forest logging on public land (state forests) in the west of Victoria. Essentially, it is an agreement to log our native forests, but without the need for assessment of threatened species or natural heritage under national environmental protection laws.

Two decades on, these governments are attempting to renew the agreement to lock in a further 20 years of logging for the west of Victoria. The Western RFA covers a huge area, from Melbourne to the South Australian border. This is already fragmented landscape containing some of the most cleared ecosystems in the whole state – essentially where there is hardly any forest remaining to be logged.

The Western RFA promised a lot but delivered very little. It is based on a false premise, is obsolete, and should be cancelled because:

- There is little native forestry industry left in the west;
- It was originally set up due to the export of woodchips, but there is no longer native forest export from the west of the state;
- It is largely state-funded and is unprofitable;
- Independent reviews have recommended for the Western RFA to be cancelled;
- It is ecological-damaging and has delivered little to protect native forests since its inception, despite the promise it would do so;
- There are still significant gaps in the protected area and reserve system in the west;
- The west is an area rich in threatened species and endangered habitats which should be protected.

Suggested points for the Survey – Modernisation of the Victorian Regional Forest Agreements

1. What changes have you seen in the RFA regions?

This submission is about the West Victorian RFA.

The Western RFA is now out of date and seems completely unnecessary, disproportionate and damaging to renew such an agreement where the economic and ecological context has changed dramatically in the last 20 years.

There little native forestry industry left in the west.

- Total revenue from Western forests in 2017–2018 was \$700,000 (yes, less than \$1 million).ⁱ
- State funding to VicForests managed western “Community Forestry” in 2017–2018 was \$678,000 (yes, that’s a surplus of \$22,000 per annum).
- Total volume of timber generated from native forests was 21,000 cubic metres, or 1.5 per cent of total state production. Mostly low grade uses such as firewood.
- There is no longer export of woodchips or other products from native forests in western Victoria, which was one of the key reasons the RFA was set up in the first place.

2. What should the Victorian RFAs aim to achieve over the next 20 years?

The Western RFA should be cancelled.

In 2010 the *Independent Review on Progress with Implementation of the Victorian Regional Forest Agreements Final Report* recommended that the Western RFA be cancelled.

- The Western RFA should be cancelled, allowing national environmental laws to apply to protect threatened species and habitats.
- VicForests, the Victorian Government’s commercial native forestry business, should be removed from the west of the state.
- The national parks and reserve system on public land should be completed in the west to international benchmarks, following an appropriate assessment and consultation process.

3. What are the potential improvements you think should be made?

The Western RFA should be cancelled, but if it continues it should not include native forests.

- The timber industry should be based entirely on plantations established on previously cleared private land.
- Pricing and cost of access to publicly-owned native forest (even for domestic firewood) should be reviewed so as not to disadvantage private growers of woodlots.
- Forest management systems need to be developed specifically for the habitats and species of the west and impacts of climate change (more fragmented, drier climates, smaller vegetation patches, many slow-growing species, large numbers of endangered species and habitat types).
- Traditional Owners land rights, ownership and management, should be recognised and encouraged.

4. *How could the potential improvements in the consultation paper help modernise the Victorian RFAs?*

- Not really that helpful, as the consultation paper fails to address the core issues.
- Decisions to renew the RFAs have already been made, and the consultation appears to have a pre-ordained outcome.
- This process is just 'tinkering' with what is a fundamentally flawed approach.

5. *Do you have any views on which potential improvements are most important?*

- Native forest logging is finished in the west.
- Western forests should be assessed and managed economically and socially for all uses and values, including water, carbon storage, recreation and biodiversity.
- There is a growing recreation need for Melbourne's population growth. Many of these forests are popular recreation areas, such as the famous Beeripmo Walk at Mount Cole. The economic benefits of these should be assessed in detail and compared to current local native forest logging benefits.
- Many rivers such as the Heritage River and the Wimmera River are not even mentioned in the existing Western RFA.

THEME ONE: ECOLOGICALLY SUSTAINABLE FOREST MANAGEMENT

The Independent Consultation Paper suggests that:

"Whilst the vision of Australia's National Forest Policy Statement included a 'holistic' approach to managing forests for all their values and uses, so as to optimise benefits to the community (Commonwealth of Australia 1995), the Victorian RFAs have tended to focus on conservation of forest biodiversity and timber production.

Healthy forests have intrinsic value and can sustainably provide a wide range of benefits to Victorian society and its economy. The benefits that forests provide are known as ecosystem services. The ecosystem services provided by Victoria's forests include:

- *Water supply, wood and fibre, honey*

- Regulation of the climate, carbon sequestration, regulation of water catchments, and pollination services
- Opportunities for recreation and tourism, education and scientific research, cultural and historical heritage, and amenity and aesthetic values.

Victoria's forests give us a sense of place and provide opportunities for social connection. Forests are central to the culture and identity of Aboriginal Victorians.

The Victorian RFAs should more clearly incorporate the wide range of values and benefits that forests provide."

See Section 4 of the Independent Consultation Paper for further information.

6. How do you use forests in your region?

- I value forests for wildlife and biodiversity.
- I value forests for recreation.
- I love camping and bushwalking in these forests.
- Insert your own comment or experience from a western forest.

7. How could the RFAs better provide for multiple forest uses (i.e. recreation, conservation, livelihood and economy)?

- There is no need for an RFA in the west of Victoria if there is no native forest logging.

There is little economic value from native forest logging in the west of the state (less than \$1 million per years in total revenue).

- Pricing and cost of access to publicly-owned native forest should be reviewed so as not to disadvantage private growers of woodlots.
- Forest should be managed for multiple values, which could be done without RFA like many other parts of the state. Why should the native forest logging industry get special treatment and exemptions from national environmental laws?

1.2 CONSERVE FOREST DIVERSITY AND MAINTAIN ECOSYSTEM HEALTH

The Independent Consultation Paper suggests that:

"Two decades ago, the RFA process supported the expansion of the CAR reserve system and included a focus on threatened species. However, despite these efforts, biodiversity continues to be lost from Victoria and further effort is needed to halt and reverse the decline.

The modernised RFAs should respond to the likely impact of climate change and other environmental pressures on threatened species, threatened ecological communities and key threatening processes by including the adaptation mechanisms needed to address these impacts. The RFAs should support:

- Victoria's biodiversity plan including broader scale threat management, specific threat management and supporting collaboration between stakeholders to drive improvement in biodiversity conservation (see, Department of Environment, Land, Water and Planning 2017)
- Matters of National Environmental Significance under the Commonwealth's Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).

The most relevant Matters of National Environmental Significance for forests include, national and world heritage, wetlands of international importance (listed under the Ramsar Convention), listed threatened species and ecological communities, and migratory species protected under international agreements (see, Department of the Environment and Energy n.d.). To conserve forest biodiversity and maintain ecosystem health, the modernised RFAs should include a range of conservation strategies, including changes to the formal and informal CAR reserve system, restoration of EVCs, improving connectivity between fragmented EVCs, and working with private landholders to conserve

under-represented EVCs.”

See Section 4 of the Independent Consultation Paper for further information.

8. What are your views on existing environmental protections afforded across the entire forest estate (including parks, reserves and State forests) through the RFAs?

- The Western RFA has not delivered a comprehensive, adequate or representative reserve protected area system in the west of the state, as it promised it would.
- The Western RFA it has largely failed over the last 20 years to deliver for biodiversity – why would a new agreement be any different? Victoria has a range of legislation and policies aimed at improving biodiversity, including a state biodiversity strategy, catchment management authorities, and so on – why aren't these mechanisms and institutions being used?
- Significant new national parks in the region, such as the Otways and Cobboobonee near Portland, were the result of community campaigns achieved in spite of the RFA, not because of it.
- There has been little native forest logging in Wombat Forest in central Victoria for over a decade.
- There is now an active Victorian Environmental Assessment Council (VEAC) investigation in the central west, looking at the future of Wombat, Pyrenees, Wellsford (not in the RFA area) and Mount Cole state forests to fill well-recognised gaps in the representativeness of Victoria's reserve system. Final VEAC recommendations should be adopted by the Victorian Government.
- Victorian Environmental Assessment Council (VEAC) have also recommended on two occasions that areas be protected to fill significant gaps in the reserve system in the south-west (between The Grampians and the South Australian border). These recommendations were accepted by the Victorian Government and are consistent with the Andrews Government's *Biodiversity Strategy*, and should be implemented.

9. How could the environmental protections be improved?

- The ecological criteria used in the Western RFA are now out of date and inconsistent with various international and national agreements and strategies that have been signed by the Australian Government.
- There is no evidence that Western RFA has led to improved pest plant and animal control or treatment in western forests, even though this was promised.
- The clearly identified gaps in the reserve system on public land should be filled, with the creation of new national parks and reserves in the central west and the south-west, following an appropriate public assessment and consultation process.
- Forest management systems need to be developed specifically for the habitats and species of the west and impacts of climate change (more fragmented, drier climates, smaller vegetation patches, many slow-growing species, large numbers of endangered species and habitat types)

- In the Portland and Horsham Forest Management Areas (FMAs) alone there are at least 52 threatened vascular plant species, and 81 threatened fauna species that have been recorded in or close to State Forests. There are few specific rules for many of these species in forestry codes.
- Across western Victorian forests, 70 per cent of the area targeted for logging contains native vegetation types that are either endangered (19 per cent) vulnerable (11 per cent) or depleted (40 per cent).
- In the Horsham Forest Management Area, 54 per cent of the vegetation proposed for logging is endangered.
- More than 20 threatened native animals and 14 threatened native plants were found in or closely adjacent to a third of all proposed logging areas.
- The south-eastern red-tailed black-cockatoo is a nationally endangered species, listed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). It is vulnerable to climate change and threatening processes currently allowable in State Forests, including logging and inappropriate fire regimes, which can impact on the availability of critical food resources and nesting hollows for the bird. There need to be an expanded formal protected area system and strong rules, including the release of a final recovery plan for this important species.
- Due to the cleared and fragmented nature of remnant native vegetation in the west of the state, any remnant vegetation has high conservation value. There is likely to be little 'old growth' as per current definitions in the west. If old growth exists it should be protected, but in the west, the focus in many depleted vegetation types should be on individual large old trees, as these are often rare and not part of larger old growth patches.
- The informal reserve system such as special protection zones in the current RFAs are not consistent with the current JANIS criteria and should be made part of the formal reserve system.
- There is no real link between private land conservation and the Western RFA. The Western RFA did nothing to support private land conservation in the west of the state. This has happened in spite of the RFA, not because of it. If this is to be a feature, significant funding should be provided to Trust for Nature to protect important vegetation patches on private land.

1.3 PROMOTE TRADITIONAL OWNER RIGHTS AND PARTNERSHIP

The Independent Consultation Paper suggests that:

"DELWP has already committed to building collaborative relationships and working partnerships with Victorian Traditional Owner groups. This includes increasing the involvement of Traditional Owner groups in the management of country." (See: Department of Environment, Land, Water and Planning 2015a).

The RFA modernisation process provides impetus to include meaningful consideration of the rights and aspirations of Traditional Owners in the RFAs and Victoria's forest management system.

The RFAs should support the recognition of the rights of Victoria's Traditional Owners to partner in land management on parks, reserves and State forests, and seek economic and cultural opportunities for Aboriginal Victorians."

See Section 4 of the Independent Consultation Paper for further information.

10. What opportunities could the RFAs provide to support access to and traditional use of forests by Traditional Owners and Aboriginal people?

This question should be directed to Traditional Owner groups. However, we make the following observations.

- Traditional Owner's land rights and management rights should be recognised and encouraged.
- Currently, most co- or joint-management arrangements in Victoria have been delivered in areas protected under the *National Parks Act 1975*, with no relationship to the RFAs or state forests.
- Management informed by both traditional knowledge and science and undertaken by Traditional Owners has great potential to help improve the health and resilience of forests and communities in western Victoria. Elements of this could include:
 - Park or patch-specific joint management plans e.g. see Joint Management Plan for the Dja Dja Wurrung Parks.
 - Funding and resources to build management capacity within Indigenous communities.

11. How could the RFAs enable the legal rights of Traditional Owners to partner in land management and seek economic and cultural opportunities to be realised in future forest management?

This question should be directed to Traditional Owner groups. However, we make the following observations.

- State forest should be considered for control and management by Indigenous communities, but due to the range of separate legislative process regarding Native Title and Indigenous management, it is hard to understand exactly how the RFA could usefully deliver in this area. Rather, it is potentially an unfortunate block to cultural and ecological management.

THEME TWO: THE LONG-TERM STABILITY OF FORESTS AND FOREST INDUSTRIES

2.1 ADDRESS CLIMATE CHANGE AND OTHER LARGE SCALE DISTURBANCES

The Independent Consultation Paper suggests that:

"Climate change and other large-scale disturbances, including landscape-level fires and invasive species, are threats to Victoria's forest biodiversity, forest-dependent industries and the communities that live near forests.

A modernised RFA process should ensure that forest management decisions are informed by up-to-date scientifically-credible information on the current and likely future impact of climate change and other large-scale disturbances. This includes improving our understanding of how the interaction between climate change and other pressures on the natural environment is leading to cumulative impacts and amplifying the threats faced by forests.

Forest management strategies for State forests, parks and reserves should incorporate multi-scale actions that build the resilience of Victoria's forests, including State-wide policy and guidance, landscape level actions across RFA regions, and local level forest management actions." See Section 4 of the Independent Consultation Paper for further information.

12. How could the RFAs consider climate change and other large-scale natural disturbances (including bushfires)?

- Other than in the Alpine regions, most climate models have not been adequately assessed to scale. This assessment should be made for all regions of Victoria.
- There should be an assessment of each forest management area to identify the broader trends, similar to what has been achieved by Parks Australia. See: www.environment.gov.au/topics/national-parks/parks-australia/climate-change
- Each park or patch of public land/forest should have a climate strategy which attempts to translate the potential implications of climate change to management scale. See: www.environment.gov.au/resource/impacts-and-management-implications-climate-change-australian-governments-protected-areas
- DELWP is currently funding Greening Australia to develop guidelines for Climate Future Plots. These important research plots should be introduced across the state. They are designed to introduce genetic variants of key plants to a range of forest/ecosystem types across Victoria, enabling land managers to (1) enhance habitat resilience to the uncertain and unpredictable effects of future change by incorporating genetic and/or species diversity into restoration plantings, and (2) inform future land managers about the most effective actions to build resilience to climate change in our natural systems, especially during restoration when species crash due to climate-induced drought, insect attack etc. See vicnature2050.org/climate-future-plots.
- The Climate Future Plot initiative is one important action arising from several seminars run by the VicNature2050 partnership: Bio 21 institute, University of Melbourne; La Trobe University; Greening Australia; Arthur Rylah Institute for Environmental Research, Victorian National Parks Association; Royal Society of Victoria and others. The results of the seminars can be found at '10 Things we can all do to help nature adapt to a new climate' on vicnature2050.org

2.2 SUPPORT THE DEVELOPMENT OF FOREST DEPENDENT INDUSTRIES

The Independent Consultation Paper suggests that:

"The Victorian RFAs have not achieved long-term stability of supply for the timber industry. Without certainty of supply, it is difficult for the timber industry to invest with confidence, to develop value-added approaches to processing wood products or to support efforts to reduce greenhouse gas emissions using low embodied energy building materials that store carbon.

In addition, there are a range of industries that are dependent or partially dependent on healthy forests. These include the tourism and recreation industry, apiary, and the water industry.

The RFA modernisation process should consider how governments can best support the development of forest-based industries, including the forest and wood products industry, tourism and recreation industry, apiary, and the water industry, and ensure that these industries are sustainable into the future.

This process should include consideration of climate change, severe fires, invasive species, Matters of National Environmental Significance, and other factors that present a challenge to the viability of forest-dependent industries.

The RFA modernisation process should also consider opportunities to encourage investment in innovation and new market opportunities.”

See Section 4 of the Independent Consultation Paper for further information.

13. How could the RFAs better address industry sustainability?

- The native forest logging industry in western Victoria is no longer viable, and focus should be on other forest-dependent industries, especially carbon storage, recreation, tourism and water. For example:
 - Total revenue from western forests in 2017–2018 was \$700,000 (yes, less than \$1 million).ⁱⁱ
 - State funding to VicForests managed western “Community Forestry” in 2017-2018 was \$678,000 (yes, that’s a surplus of \$22,000 per annum).
 - Total volume of timber generated from native forests was 21,000 cubic metres, or 1.5 per cent of total state production. Mostly low grade uses such as firewood, which would be better sourced from woodlots on farms.
- Woodlots and plantations on private land, or community woodlots in strategic locations, should be the focus for providing firewood. Pricing and cost of access to publicly-owned native forest should be reviewed so as not to disadvantage private growers of woodlots.
- Western forest should be assessed economically and socially for all uses and values including water, carbon storage, recreation and biodiversity, before any decisions on future forest use are made.

14. How could the RFA’s encourage investment and new market opportunities for forest-based industries (including the forests and wood products industry, tourism, apiary and emerging markets such as carbon)?

- There is still currently no agreed carbon method for assessing avoided logging in native forest, this should be completed urgently.
- The state government-owned logging agency VicForests has proposed commercial logging of around 50-60 state forests and woodlands in the west of the state, under its current Timber Utilisation Plan. On paper, they want logging of some shape or form in almost 40,000 hectares of what are Victoria’s most cleared landscapes, under the guise of “Community Forestry”. This acts as a block to other uses and should be removed.
- Remove VicForests control of western forests, and assess the area for other uses, and complete the protected area system.
- Many of the national parks in western Victoria, such as The Grampians National Park, are at capacity in peak times for camping and recreation. There is a need to provide more opportunities for camping and recreation, particularly for the growing ‘grey nomad’ market.

THEME THREE: GOVERNANCE AND MANAGEMENT OF VICTORIA’S FORESTS

3.1 SUPPORT THE VICTORIAN GOVERNMENT EFFORTS TO IMPROVE FOREST MANAGEMENT PLANNING

The Independent Consultation Paper suggests that:

“Victoria’s approach to forest management planning has served the State well, but forest management plans now require renewal. The Victorian Government has indicated an intention to update forest management plans and it is important that this happens.

Changing the approach to forest management planning and extending the new approach across the State will take time. The RFA modernisation program provides an opportunity to identify milestones to help the Victorian Government work towards achieving the necessary reforms over the coming years. It also is an opportunity for the Victorian Government to obtain feedback from stakeholders on forest management planning, and to collect information that will help in the development of a more inclusive, adaptive and consultative approach to forest management planning.

Overall, forest management planning for public forests (including State forests, and forested parks and reserves) should aim to deliver ecologically sustainable forest management and work towards the State’s vision for forests. It should be undertaken in partnership with Traditional Owners.

Moreover, as new knowledge is acquired, and circumstances related to forests change, the forest management planning system will need to adapt. For this reason, the reforms to forest management planning should be an ongoing process of improvement.”

See Section 4 of the Independent Consultation Paper for further information.

15. How can the RFAs support the adaptive management of Victoria’s forests in response to emerging issues (e.g. major bushfires) and opportunities (e.g. emerging industries)?

- I disagree that the current approach to forest management has served Victoria well. In most cases, it has led to significant decline in the condition of remaining native forests and decline in the forestry industry. The forestry industry is less sustainable and less innovative due to having received special sheltered treatment from RFAs.
- The *National Parks Act 1975* in Victoria provides for park planning and is a legislated requirement. Logging is not allowed in areas protected under the *National Parks Act*. The RFA and so-called forest planning have no effective role and are a duplication of existing or future national park plans, and are likely to create conflicting objectives.
- There should be a ban on logging and an immediate review of forest management plans following bushfires, major floods or significant ecosystem changes.
- Salvage logging should be banned in the west and elsewhere.
- There is considerable scientific evidence that decades of commercial forest management has led to an increase in the fire risk across Victoria.

3.2 IDENTIFY RESEARCH PRIORITIES

The Independent Consultation Paper suggests that:

“The Australian and Victorian Governments recognise that continuing research can contribute to improved outcomes for adaptive management and continual improvement in forest management, as well as in the management of Matters of National Environmental Significance, social impacts and benefits, and industry development (Department of Agriculture and Water Resources et al. 2018). The Governments also recognise that research priorities will change and evolve over time as new information is generated and as circumstances change.

The RFA modernisation process should facilitate negotiations on forest research priorities between the Victorian and Australian Governments, including identifying how existing research programs and investment can be better utilised. There is, for example, a need for more research into:

- *The state and trend of pressures on forests, and the effectiveness of management actions to address pressures*
- *The implications of an increasing gap between demand for wood products and the ability of Victoria's forests to supply these products*
- *The implications of the steady decline in the number of forestry graduates from Australian universities."*

See Section 4 of the Independent Consultation Paper for further information.

16. What areas of research would better equip us to sustainably manage Victoria's forests?

- The native forest logging industry has no social licence and is deeply unpopular in the general community, with polling consistently showing less than 10 per cent of the population support native forest logging.
- There is a decline in forestry graduates as the native forest industry is declining and is deeply unpopular with the general community– why would a young person choose this as a career as it has no future? Most remaining forestry courses have only survived with when government subsidises.
- There has been insufficient survey effort to have good knowledge of what species are present in the Western RFA area or their range and population. State flora and fauna databases do not provide adequate data about most areas that would be covered by the Western RFA.
- The focus of the industry should be on developing well-managed plantations on private land. Investment should focus on manufactured wood products and recycling, and move out of native forest logging.

3.3 IMPROVE MONITORING AND REPORTING

The Independent Consultation Paper suggests that:

"Forest management needs to be based on robust data and systematically monitoring, evaluating and reporting on the objectives of forest management (Department of Agriculture and Water Resources et al. 2018).

The Victorian Forest Monitoring Program has already begun to provide information, including baseline data for long-term trend detection, which is being used to inform continuous improvement in the management of Victoria's forests. The Victorian Government has also engaged in the development of environmental-economic accounting to provide better, integrated and more consistent information and analysis on environmental assets, including forests.

The RFA modernisation program presents an opportunity to continue to improve monitoring and reporting to enhance evidence-based decision making and improve the transparency of forest management with the community.

Actions to be considered in the RFA modernisation process include:

Review the current suite of indicators used to report the state and trend of forests and forest-dependent industries, including a review of gaps (e.g. socio-economic values, climate change and emerging pressures), and the relevance and cost-effectiveness of current indicators

- *Continue and improve the Victorian Forest Monitoring Program*
- *Provide better information on the effectiveness of the informal reserve system and forests on private land in protecting biodiversity*
- *Expand efforts to engage people in monitoring and citizen science in State forests, parks and reserves*

- Enhance reporting on key sustainability indicators, including indicators of the effectiveness of forest and park management, in formats that are readily understood by decision-makers and the community
 - Improve the alignment between the various forest-related reporting systems, including the State of the Forests Reports, the State of the Parks Reports and the RFA reports and reviews, to enable stakeholders to have a more transparent view of the state and trends of the entire forest estate
 - Improve the RFA review and reporting processes and the reporting on the outcomes of, and responses to, forest audits
 - Continue to develop environmental-economic accounting and use the results to build a shared understanding with the community about the state and trend of all values provided by forests
 - Promote regular engagement between forest management agencies, Traditional Owners and the science and research community.”
- See Section 4 of the Independent Consultation Paper for further information.

17. How could RFA monitoring, review (including five-yearly reviews) and reporting arrangements be improved?

- In 2010 the *Independent Review on Progress with Implementation of the Victorian Regional Forest Agreements Final Report* recommended that the Western RFA be cancelled.ⁱⁱⁱ Independent reviews should be listened too and not ignored.
- The western forests are not included in most recent allocation orders for VicForests^{iv}, making the legal status of logging uncertain.
- Reviews should be shorter. They should be every two years and include both and on-ground ecological assessment.
- The current ‘tick and flick’ approach to review should be abandoned. Reviews should be substantive and be tabled in Parliament, like other audit and review reports.

ⁱ www.VicForestsVicForests.com.au/static/uploads/files/report-VicForestsVicForests-annual-report-2018-wfccxhsjgpfj.pdf page 13

ⁱⁱ www.VicForestsVicForests.com.au/static/uploads/files/report-VicForestsVicForests-annual-report-2018-wfccxhsjgpfj.pdf page 13

ⁱⁱⁱ “There are a number of key issues that I have recommended the Parties consider for the continued implementation of the RFAs. The most critical of these is consideration of cancelling the West Victoria RFA or substantially amending the RFA given the significant additions to reserves and reduction in timber availability made since the agreement was signed. www2.delwp.vic.gov.au/data/assets/pdf_file/0018/412380/Victorian-RFAs-period-1-2-Independent-Review-of-progress.pdf page 9.

^{iv} www.gazette.vic.gov.au/gazette/Gazettes2019/GG2019S153.pdf#page=2