



VICTORIA'S REGIONAL FOREST AGREEMENTS

The failures and the problems with renewing for another 20 years.

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

There are five RFAs in Victoria: East Gippsland, Central Highlands, North East, Gippsland, and West Victoria.

Essentially, they are agreements to log our native forests, but without the need for assessment of threatened species or natural heritage under national environment protection laws.

Two decades on, the state and federal governments are attempting to renew the agreements to lock in a further 20 years of logging for Victoria – continuing their exemption from national environmental protection laws.

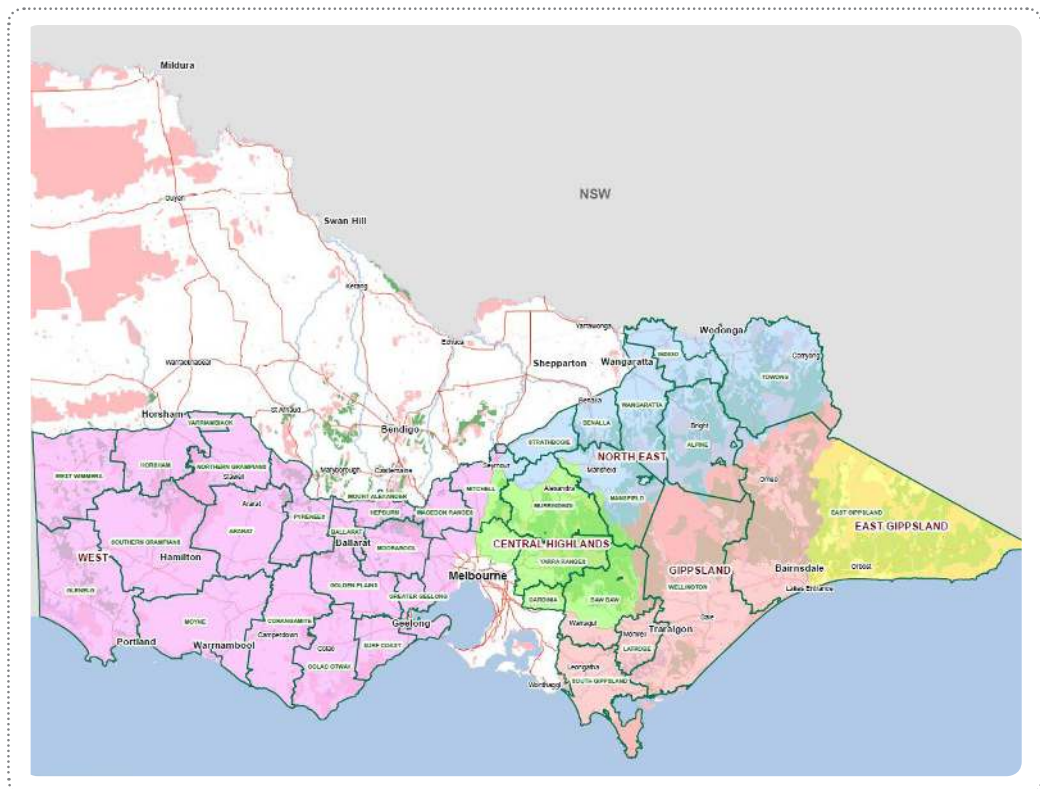
None of the Victorian RFAs have met their objectives. Numbers of forest-dependent species listed as threatened continue to rise, and forest health is declining and will only get worse under climate change. Even the native forest industry is stagnating and in decline as their main resource runs out or is reduced through landscape-scale fire.¹

See more detailed background here at www.vnpa.org.au/regional-forest-agreements

Now, the Victorian and Commonwealth governments are seeking community input to inform the modernisation of the five Victorian RFAs.

An independent consultation paper has been produced which they are inviting comment on: www2.delwp.vic.gov.au/futureforests/get-involved/joint-rfa-consultation-with-commonwealth/independent-consultation-paper

There are five RFAs in Victoria:
East Gippsland (yellow), Central Highlands (green), North East (blue), Gippsland (pale red), and West Victoria (pink).



The Independent Consultation Paper - Modernisation of the Victorian Regional Forest Agreements paints a rosy picture of the success of RFAs in Victoria, but key elements of it are unfounded and misleading.

The RFAs make big claims that logging is ok because it also protects the environment through the establishment of parks and reserves. But this is largely a myth. The RFA process has had little to do with the establishment of new national parks and reserves in Victoria, and has been a block rather than a driver to the creation of protected areas.

- **The RFAs are not responsible for the bulk of Victoria's reserve system**
- **The RFAs ignore key criteria in national agreed policy for formal protection**
- **The RFAs are a block to better protection and new national parks**
- **The RFAs ecological criteria are outdated and inconsistent**
- **The RFA review fails to recognise that there are still significant gaps in Victoria's reserve system**
- **The RFAs ignore climate change implications**
- **The RFAs ignore bushfire impacts**
- **The RFAs ignore other forest values**

See below for more detail on all these points.

There are many well-recognised problems with RFAs; you can read more about them here: www.vnpa.org.au/regional-forest-agreements

If you're interested specifically in the forests in the west of the state, you can view our West Victorian RFA specific Issue Paper here and make your response relevant to that particular area: www.vnpa.org.au/cancel-western-rfa

1) THE RFAS ARE NOT RESPONSIBLE FOR THE BULK OF VICTORIA'S RESERVE SYSTEM

The Independent Consultation Paper concludes: "Satisfactory – The Victorian RFA process successfully identified areas to be included in the state's CAR reserve system. Today, Victoria has 3 million hectares of forest within the formal reserve system. The modernisation of the RFAs will need to take into consideration the targets within Victoria's biodiversity plan, including supporting collaboration between stakeholders to drive improvement in biodiversity conservation (see, Department of Environment, Land, Water and Planning 2017).

There is a need for better information on the effectiveness of the informal reserve system and forests on private land in protecting biodiversity, and for this information to be made available to the public."ⁱⁱ

The first two sentences above give the impression that the RFAs have been in some way responsible for the bulk of the formal reserve and park system. This is unfounded and misleading.

The report notes that all the changes to land tenure identified through this process were implemented in Victoria's RFA regions between 1999 and 2004. The report also notes that Victoria has 3.68 million hectares of parks and conservation reserves.

However, of the 3.68 million hectares of parks and conservation reserves cited, 84 per cent or roughly 3,077,000 hectares of land was protected under the *National Parks Act 1975* in Victoria before 1999 – before the RFAs started. This does not include the significant areas protected in other public land tenures such the *Crown Land (Reserves) Act 1978*.

The RFAs have largely been a block to the creation of formal protected areas.

Key points:

- **84 per cent of the reserve system was in place before the RFAs. Many of newer parks were created either outside the RFA areas, or were created due to extensive community campaigns in spite of the RFAs.**

2) THE RFAS IGNORE KEY CRITERIA IN NATIONAL AGREED POLICY FOR FORMAL PROTECTION

Further, the *Independent Consultation Paper* states: "In Victoria, the information developed through the Comprehensive Regional Assessments was used to identify changes to public land tenure and changes to the management of State forests. All the changes to land tenure identified through this process were implemented in Victoria's RFA regions between 1999 and 2004. The outcome was an expansion of Victoria's CAR reserve system, and a corresponding reduction in the area of State forest and other Crown lands."ⁱⁱⁱ

The statement that "By 2003, 900,000 hectares of forest had been added to the existing reserve system in Victoria through the RFA process" is quite misleading.

The bulk of this 900,000 hectares is in the *informal* reserve system, and not formally or permanently protected. According to the 2018 *Victorian State of the Forests* report, 828,000 hectares of special protection zones (actually informal and impermanent reserves) were established in Victoria in 2004.^{iv}

Between 1999 and 2004, there were roughly 102,165 hectares (excluding marine national parks and sanctuaries) protected under the National Parks Act. A large proportion of this was box-Ironbark parks in central Victoria following a long running community campaign and extensive investigation by the Environment Conservation Council (now VEAC). Most of this forest and woodland is also outside the West Regional Forest Agreement area. There were some small additions to the formal reserve system, but not a lot in RFA areas.

This approach is inconsistent with a key passage of the JANIS criteria, and by default the National Forest Policy. JANIS criteria required that “all reasonable efforts should be made to provide for biodiversity ... in the dedicated reserve system on public land” and an informal reserve system should only be used if it “is demonstrated that it is not possible or practicable to meet the criteria in the Dedicated Reserve system”.

The key passages in JANIS is:

“All reasonable effort should be made to provide for biodiversity and old-growth forest conservation and wilderness in the Dedicated Reserve system on public land. However, where it is demonstrated that it is not possible or practicable to meet the criteria in the Dedicated Reserve system, other approaches will be required. For example, conservation zones in approved forest management plans and covenants on private land that bind successors in title could be used, in conjunction with Dedicated Reserves, to define the CAR reserve system for a particular region”^v (emphasis added).

Around 92 per cent of so-called reserves created under all the Victorian RFAs are informal (special protection zones etc.). Only 8 per cent of reserves related to RFAs are protected in formal reserves.

This is in contrast to other jurisdictions such as NSW, which protected 23 per cent of the area in formal or dedicated reserves and less than 4 per cent in informal reserves (either as reserves or by prescription) in its RFAs.^{vi}

There is no evidence in the Independent Consultation Paper, or elsewhere, that Victoria has “demonstrated that it is not possible or practicable” to establish formal reserves.

The Victorian RFAs created a forest zoning system and did not deliver a CAR reserve system as described in the national agreed JANIS criteria (see point 4).

Key points

- The Victorian RFAs have embedded the ‘informal’ reserve system.
- Only 8 per cent of areas identified for protection in the Victorian RFAs were formally protected in parks and reserves.
- All, or at a minimum, a significant proportion of the informal reserve system should be included in the formal reserve system and protected under the National Parks Act.

3) THE RFAS ARE A BLOCK TO BETTER PROTECTION AND NEW NATIONAL PARKS

There is no demonstrable link between RFAs and increase in the national parks and conservation estate.

The *Independent Consultation Paper* also states: “Whilst the area of Victoria’s formal reserve system is relatively stable, and indeed has grown over the 20-year time frame of the RFAs, the informal reserve system relies on an adaptive management approach, having flexible boundaries that can change over time to reflect new information and forest dynamics.”^{vii}

Between 2000 and 2014, the total area of parks and conservation reserves increased by around 400,000 hectares^{viii}, due to reserves creation either outside the RFA areas (e.g. Red Gum Parks), or due to community campaigns and other assessment processes in spite of the RFA (see below).

Formal park creation in roughly the last 10 years is at its lowest in 50- 60 years.^{ix}

The most updated information shows informal reserves in 2016 total 761,100 ha^x. Based on these figures, the informal reserve system has reduced by 66,900 hectares over the last 12 years, or 8 per cent of the total protected area.

Much of this reduction is likely due to the 2008 additions to the reserve system in East Gippsland, which in many cases included areas which had no value for commercial logging. In total, the Brumby Government committed to protect 41,000 hectares of old growth and icon sites in 25 areas scattered across East Gippsland. Of these:

- almost 40 per cent is not old growth and of no commercial value to the logging industry
- Some of the areas identified included previously cleared areas and others exhibiting post logging regeneration failure^{xi}

Much of this package swapped existing informal reserve zones into dedicated or formal protected areas, and industry was compensated by being allowed access to previous temporary protection zones. Many of these areas have now been logged.

An extensive community campaign in the 1980s and 1990s led to commitments to establish a new Great Otway National Park. This was in spite of the RFA, rather than because of it^{xii}. The Great Otway National Park was legislated in 2005 adding around 53,732 hectares to the formal reserve system.

Like the Otways, formal protection of forest in the Portland Forest Management Area occurred largely due to long running community campaigns, again, in spite of the RFA rather than because of it. The campaign for the protection of the Cobboboonee Forest and the rest of the State Forests of the Portland Forest Management Area began in early 1996 after repeated accounts by the community over many years of the deliberate ringbarking and poisoning of significant numbers of old-growth hollow-bearing trees by government forestry departments. Cobboboonee National Park (18,510 hectares) was finally created on 9 November 2008.

Private land protection mechanisms

The *Independent Consultation Paper* notes other mechanisms for protection, including: Conservation covenants under the *Victorian Conservation Trust Act 1972 (Vic)*; Land Management Cooperative Agreements under the *Conservation Forests and Lands Act 1987 (Vic)*, and provisions of the *Planning and Environment Act 1987 (Vic)*.

There have been repeated calls for increased funding for private land conservation, over the last decade, such as covenants under Trust for Nature and the creation of a revolving fund for high priority land, but none of these initiatives have been funded by either state or federal governments.^{xiii}

Likewise, other mechanisms, such as a land management cooperative arrangements and provisions of the Planning Environment Act, are largely only used as part of the offset arrangements under the *Guidelines for the removal, destruction or lopping of native vegetation*, December 2017.^{xiv}

Native vegetation regulations and policy state: "The objective for the regulation of native vegetation clearing is to ensure that there is no 'net loss' to biodiversity as a result of the permitted clearing of native vegetation. This is achieved by applying the three step approach: avoid, minimise and offset. At a broader level, the Victorian Government is committed to achieving an overall 'net gain', expressed as an improvement in the overall extent and condition of native habitats across terrestrial, waterway and marine environments. Not all habitats or vegetation types will need to be improved or increased in order to achieve this goal, but overall gains will need to outweigh losses. Such gains will be the result of investment and other efforts by government, community and land managers. The most important places to achieve gains and to avoid losses are locations with higher relative contribution to biodiversity benefit."^{xv}

Key points

- There is no demonstrable link between the RFAs and an increase in the conservation estate.
- The formal creation of national parks in the last decade is at its lowest in the last 50–60 years.
- There is no evidence that the RFAs either promoted or provided any funding for private land conservation.
- The RFAs seem to claim the reserve system as some sort of 'pair' or 'offset' for continued native forest logging. Victorian government policy also assumes the same for loss of native vegetation across the state, which is in reality a sort of policy double counting.

4) THE RFA ECOLOGICAL CRITERIA ARE OUTDATED AND INCONSISTENT

It should also be noted the JANIS criteria is now outdated and inconsistent with a range of other international agreements and national strategies. For example, through the Convention on Biological Diversity, the Australian and Victorian governments are committed to establishing a representative protected area system. For terrestrial areas, this is largely achieved through the National Reserve

System (NRS). The NRS is a formally-recognised, national network of protected areas which cover terrestrial and inland freshwater ecosystems. It is complemented in marine environments by the National Representative System of Marine Protected Areas (NRSMPA).

The NRS and the NRSMPA processes incorporate the broad requirement for a comprehensive, adequate and representative protected area system. This is commonly referred to as the 'CAR' system. The CAR criteria set targets at the ecosystem level; for terrestrial areas in Victoria, Ecological Vegetation Classes (EVCs) are used as ecosystem surrogates, they are however different to the JANIS criteria embedded in the RFAs.

Importantly, 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."^{xvi}

The current JANIS target is not directly comparable to the 15 per cent minimum target on ecosystem representation of the JANIS criteria used in the RFAs with the 17 per cent figure in the Convention on Biological Diversity.

In applying preliminary assessment of aspects of Aichi targets, VEAC identified representation shortfalls in the Central Victorian Uplands, Goldfields and Highlands–Northern Fall bioregions.^{xvii} This is however without considering other elements of the Aichi target such as "well connected systems of protected areas" or elements of the National Reserve System strategy such as "... core areas established for the long-term survival of threatened ecosystems and threatened species habitats in each of Australia's bioregions" or "... critical areas for climate change resilience ..." ^{xviii}

JANIS criteria for determining the CAR reserve system are now ecologically poor and more ecologically appropriate criteria should be used. For example, the CAR reserve system uses JANIS and Bioregional Conservation Status (BCS) criteria for determining the endangered status of ecosystems. The JANIS and BCS criteria consider only the aerial extent of an ecosystem and nothing about the structure or function of an ecosystem. That is completely inadequate for determining an ecosystem's endangered status. Many animals require trees with hollows and such trees are only present if they are relatively old. Young forests, without such hollows, may occupy a large percentage of the original extent of that forest type, so they would not be considered endangered by JANIS or BCS criteria, but the absence of hollows and hollow-dependent species would mean that ecologically, those forest ecosystems are endangered. This is precisely the situation with mountain ash forests in the Central Highlands, which are considered endangered by the IUCN, but not JANIS.

Key points:

- The ecological criteria (JANIS criteria) is now outdated and inconsistent with a range of other international agreements and national strategies
- The JANIS criteria should be reviewed against new international and national strategies and new science, before the RFAs are renewed.

5) THE RFA REVIEW FAILS TO RECOGNISE THAT THERE ARE STILL SIGNIFICANT GAPS IN VICTORIA'S RESERVE SYSTEM

The *Independent Consultation Paper* concludes: "Satisfactory – Victoria's CAR reserve system covers all bioregions and EVDs, although the level of coverage of individual bioregions/EVDs varies. Whilst there may be remaining opportunities to incorporate EVCs that have low levels of representation into the CAR reserve system, other strategies including restoration and improving connectivity between fragmented EVCs and working with private landholders to conserve under-represented EVCs may also provide effective conservation outcomes."^{xix}

The *Independent Consultation Paper* does not adequately address the gaps in Victoria's reserve system. This is in contrast to the stated objectives in the Victorian Government's *Biodiversity 2037* strategy. The *Independent Consultation Paper* also fails to identify how the objectives of this strategy will be addressed.

The *Biodiversity 2037* strategy states:

"...many ecosystems, habitats and threatened species are inadequately represented in the reserve system and need increased protection."

"...the estimated gap in additional protected areas required to meet Australia's criteria for a comprehensive, adequate and representative reserve system is 2.1 million hectares..."

"A comprehensive, adequate and representative protected area system across public land, private land and Indigenous protected areas, that continues to be the cornerstone of conserving biodiversity."

"Priority 18: Review the extent, representativeness and adequacy of the reserve system to identify key gaps and additional complementary measures required to improve the reserve system on public and private land."^{xx}

An analysis undertaken by Victorian Environment Assessment Council (VEAC) shows there are three regions of Victoria where under-represented Ecological Vegetation Classes (EVCs) form a distinct cluster, including the 'south west cluster'.

The core of the 'south west cluster' cluster is the Glenelg Plain bioregion, the Dundas Tablelands bioregion (particularly the Cherrypool link between the Grampians National Park and Black Range State Park) and the western part of the Wimmera bioregion, especially south of the Little Desert. Adjoining areas with large shortfalls that may be readily included in an assessment of this cluster are the Warrnambool Plain bioregion and the western part of the Victorian Volcanic Plain bioregion. According to analysis in a supplement to the VEAC *Statewide Assessment of Public Land Discussion Paper*, there is a "shortfall" of approximately 205,047 hectares on public land in the south west cluster of the bioregion, though the area looked at is larger than the current forest management areas or the area covered by the West Victoria RFA.^{xxi}

More information on specific issues with the West Victoria RFA can be found here:
www.vnpa.org.au/cancel-western-rfa

Further, the RFAs tend to use the larger bioregional unit than the Interim Biogeographic Regionalisation for Australia (IBRA) sub regions now used in many assessments, which would paint a different picture if applied in RFA regions.

As stated previously, there is no evidence that the RFAs have done anything for private land conservation.

Key points:

- **Other state government policy clearly states that there is a gap of over 2 million hectares in the formal reserve system in Victoria.**
- **The RFA review does not adequately address the gaps in the reserve system.**
- **This is in contrast to the stated objectives in the Victorian Government's *Biodiversity 2037* strategy.**

6) THE RFAS IGNORE CLIMATE CHANGE IMPLICATIONS

The current RFAs do not even mention climate change and its potential impacts. Yet climate change has long been recognised as a stressor that adds to, and interacts with, a range of existing stressors that have already significantly changed and diminished Australia's biodiversity.^{xxii}

The *Independent Consultation Paper* does flag "Improvement needed" for climate change and climate-related invasive species and fire.

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.**^{xxiii}

The Victorian Environmental Assessment Council (VEAC) *Fibre and Wood Supply Assessment 2017, Appendix A Consultants' Report* makes a series of points about the implications of climate change for wood supply.^{xxiv}

The expert consultants found 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 per cent in tree volume per hectare, 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 per cent under a 3° climate change scenario by 2080.

Forest management systems need to be developed specifically for the habitats and species of the west and impacts of climate change (more fragmentation, drier climates, smaller vegetation patches, many slow-growing species, large numbers of endangered species and habitat types).

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. 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.

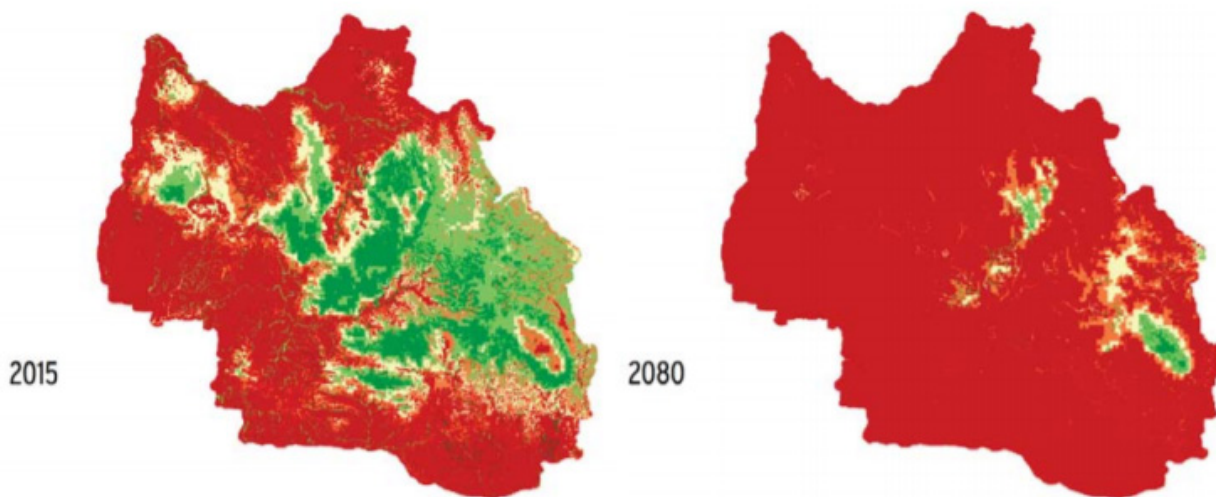


Figure 24: Regeneration suitability of mountain ash (*Eucalyptus regnans*) across the Central Highlands under current climate conditions (left panel) and a future climate that is 3°C warmer (right panel). The colour scale runs from unsuitable for natural regeneration (red) to well suited for natural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

Source: www.veac.vic.gov.au/documents/Appendix%20A%20-%20Consultants%20Report.pdf^{xxiv}

Key points

- Any new RFAs must include climate change triggers, and in the case of climate related events, lead to:
 - A ceasing of logging in effected areas
 - A comprehensive re-assessment of values and appropriateness of RFAs and sustainable harvest levels
 - An agreed carbon method for assessing avoided logging in native forests should be completed urgently
 - Climate models should be completed at a finer scale and climate plans developed for each key patch of public forest.

7) THE RFAS IGNORE BUSHFIRE 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 types.^{xxv} Logging can increase the susceptibility of moist forests to fire –such as those found in all of the RFA regions—due to several factors:

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^{xxvi}

Estimates from Department of Environment, Land, Water and Planning show that at least 40–60 per cent of state forest has since 1960 already been logged or burnt or is proposed to be logged in the 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's *Fibre and Wood Supply Assessment 2017, Appendix A Consultants' Report* 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 per cent, ranging from 3-47 per cent. 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."^{xxvii}

Key points

- Any new RFAs must include fire triggers and lead to:
 - A cease of logging in effected areas
 - A comprehensive re-assessment of values and appropriateness of RFA and sustainable harvest levels.

8) THE RFAS IGNORE OTHER FOREST VALUES

The 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*, July 2017 found that the value of key regional industries far outweighs that of the native timber industry.^{xxviii} 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.

Source: www.tsrhub.worldsecuresystems.com/Ecosystem%20Summary%20Report_V3b_low.pdf^{xxviii}

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 (see table below).^{xxix}

Even without private investment, the state 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.

The *Independent Consultation Paper* notes that "Improvement needed – Victoria's forests generate a wide range of values that provide substantial environmental and socio-economic benefits. In addition to providing material values for the benefit of people, such as water, wood, fibre and recreational opportunities, Victoria's forests have important cultural and historical heritage values".^{xxx}

But it provides no mechanisms to better assess these values and uses, other than to try to encourage more forestry graduates.

The native forest logging industry has no social licence and is deeply unpopular in the general community. Polling consistently shows less than 10 per cent of the population support native forest logging. The native forest industry is declining – why would a young person choose this as a career as it has no future? Most remaining forestry courses have only survived with government subsidies.

Key points

- **Forest should be managed for multiple values, which could be done without RFAs like in many other parts of the state. Why should the native forest logging industry get special treatment and exemptions from national environmental laws?**

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

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

FUTURE DIRECTIONS

Section 4 of the *Independent Consultation Paper* suggests that a new vision for managing Victoria's forests should seek to:

“Support the goals of Australia’s National Forest Policy Statement, including conservation, water supply and catchment management, tourism and other economic and social opportunities, wood production and industry development, and integrated and coordinated decision making and management.”

A worthy goal, but no clear direction is given other than for forestry. As demonstrated above, the RFAs claim a lot but have delivered very little in terms of conservation, tourism, water supply, etc.

“Promote partnerships between the Victorian Government and Traditional Owners.”

Traditional Owners' land rights and management rights should be recognised and encouraged. We note that currently, most co- or joint-management arrangements in Victoria have been delivered in areas protected under the National Parks Act, with no relationship to the RFAs or state forests.

“Encourage a coordinated, proactive and transparent approach to involving local communities in forest management issues.”

Why only local community involvement? The public forests of Victoria belong to all Victorians, who should be allowed to have a say in their management. Many people who are not local also have an interest in, and ownership of, our forests; this is a narrow and poorly defined objective.

“Build resilience of Victoria’s forests to climate change and other large-scale disturbances.”

Focus should be reducing disturbance. Fire and logging are currently very large disturbances.

“Consider all public forests.”

The RFA process should have nothing to do with all public forests. They have had little impact in creating new conservation reserves. If they are to exist at all they should be constrained to deal with production forest only.

The National Parks Act in Victoria provides for park planning and is a legislated requirement. Logging is not allowed in areas protected under the National Parks Act. The RFAs and so-called forest planning have no sustainable or effective role and are a duplication of existing or future national park planning processes, and are likely to create conflicting objectives.

REFERENCES

See page 12.

FURTHER INFORMATION

Victorian National Parks Association

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