

Submission to VicForests regarding the Timber Utilisation Plan (TUP)

Dear VicForests,

We have a range of concerns with the proposed TUP released for public comment on the 21 November. There are four issues:

- 1. Transparency & Clarity in public consultation**
- 2. Intensification of logging in proposed new national parks**
- 3. Increased intensity of logging around community assets –
The Beeripmo Walk in the Midlands FMA**
- 4. Proposed Logging and the Mount Cole Grevillia**

1. Transparency & Clarity in public consultation

The consultation process and material provided on the VicForests website fails to properly explain the scale of the TUP and focuses only on proposed changes or amendments. The website states “The Timber Utilisation Plan (TUP) lists Vic Forests' planned harvesting and regeneration activities for the coming years”, but the interactive map <http://vicforeststrp.maps.arcgis.com/apps/PublicInformation/index.html?appid=b4cf950b462040b69a3b5b822ef22a00> shows only amendments or changes to existing TUP, rather than what’s on overall schedule. The full picture of proposed logging is only available, once the spatial layer is analysed, which is a significant barrier to many in the community, who may be concerned about logging.

For example, there is significant community concern about potential impact of logging in the Wellsford and Wombat Forest and the proposed changes to the TUP do not include removing coupes within the proposed parks identified in the recent VEAC final recommendations for the Central West Investigation areas

<http://www.veac.vic.gov.au/investigation/central-west-investigation>

In the Wellsford Forest (proposed to be included in the new Bendigo Regional Park and Bendigo National Park additions), coupe 151-009-0123, the ‘big trees’ coupe, containing numerous large old box and ironbark trees, remains on the TUP despite being within the proposed National Park. A further six coupes (151-003-0103, 151-003-0104, 151-003-0106, 151-003-0107, 151-003-0108, 151-009-0122) remain within the proposed Regional Park. Across these six coupes, including two and a half coupes which have no previous logging history, a number of threatened species have been recorded, including the nationally critically endangered Swift Parrot.

None of the 60 coupes on the current TUP within the Wombat forest area are proposed for removal. All of these coupes are in areas proposed by VEAC to include in National or Regional Parks. These proposed coupes also do not appear on the interactive map.

We also note that the Environment Minister The Hon. Lily D’Ambrosio has made commitment to the local community that at least some of these coupe will not be logged. In a letter to, Jacinta Allen, Member for Bendigo East on 1/8/2019, regarding Timber Harvesting in the Wellsford State Forest, to Ms Wendy Radford, Wellsford Forest Conservation Alliance, that:

“VicForest is conducting timber-harvesting operations in the Wellsford State Forest however these activities are not taking place in the ‘Big Trees’ area. Further, VicForests have informed the Department of Land, Water and Planning that it does not intend to harvest in the areas where “big Trees’ are located. VEAC has recommended these areas for inclusion in the Greater Bendigo National Parks”

Recommendation:

- **To improve clarity and certainty for the community, while the government determines its response to the VEAC Investigation, we request that these coupes be removed from the TUP.**

The following two proposed new coupes that are listed in the proposed TUP schedule¹ were not found in the spatial data downloaded from the VF website, in the proposed changes either to the TUP or the April 2017 TUP.

VicForests' Region	Forest Management Area	District	Coupe Address	TUP modification type	Coupe type	Silviculture category	Area (hectares)
Western Victoria	Midlands	Midlands	172-502-0006	TUP Change: Propose new boundary	Standard operation	Category 1	38.2
Western Victoria	Midlands	Midlands	172-527-0106	TUP Change: Propose new boundary	Standard operation	Category 2	102.8

Based on the coupe addresses provided, and similar coupe addresses found in the prior logging history, these coupes are likely to be in the “G1 Pyrenees State Forest” area of the VEAC final recommendations, with coupe 172-502-0006 in this area’s farthest east, and 172-527-0106 in the central north.

2. Intensification of logging in proposed new national parks

We are deeply disturbed by the proposed intensification of logging in Midlands FMA, where 15 coupes appears to have changed, to an increased intensity of logging operations.

All 15 proposals to **change the intensity** of logging operations are a proposal to increase the intensity from a “Multi-aged stand management” to a “Category 1” “even aged” “Stand replacement” type of logging, such which is essentially clear felling.

1 “Proposed Timber Utilisation Plan Amendment”, November 2019, VicForests

Mt Cole & Pyrenees State Forests.

There are 27 scheduled coupes that are **either new** or are proposed to have more **intensive logging** than listed in the 2017 TUP and are within the **Mt Cole and Pyrenees Ranges**, Central West VEAC Investigation areas.

- Seven of these proposed coupes are in the proposed new national Parks at Mount Cole (see map attached).
- Three are in proposed new national or regional parks at Pyrenees Ranges (see map attached).

The number and hectares of each of these are summarised in the following table:

VEAC Central West final recommendation area		TUP change	Category 1		Category 2		#
			#	Hectares	#	Hectares	
VEAC Proposed Parks and Reserves	A1 - Mount Buangor National Park	New	4	86			7
		More intensive	3	100			
	A2 - Pyrenees National Park	New					2
		More intensive	2	34			
	C1 - Pyrenees Regional Park	New					1
		More intensive	1	12			
			10	233	0	0	10

VEAC Proposed State Forests	G5 - Mount Cole State Forest	New	3	128	1	31	9
		More intensive	5	320			
	G1 - Pyrenees State Forest	New	2	62	2	195	8
		More intensive	4	61			
			14	570	3	227	17
			24	803	3	227	27

Recommendations:

- **A decision about the proposed new national parks is expected in early 2020. Area identified for possible inclusion in the Mount Buangor National Park, Pyrenees National Parks, Pyrenees Regional Parks should be removed from the current TUP.**
- **At a minimum, there should be no logging in these areas, until a final decision about new parks is made.**

3. Increased intensity of logging around community assets – The Beeripmo Walk in the Midlands FMA

The Vic Forest web site notes that *“Community feedback is sought on specific operational aspects of our proposed new harvesting locations or boundary changes. This process is an opportunity to provide comment regarding concerns with:*

- *The proximity of proposed harvesting to private property or public use areas; or*
- *The identification and protection of other forest values within specific harvesting sites.”*
<http://www.vicforests.com.au/sales-supply/community-forestry-western-victoria-1/proposedtup>

There are 8 coupes directly over or adjacent to the popular Beeripmo Walk (seven with the proposed park, one in proposed state forest). Four of these are proposed new coupes and

four are proposed to increase to the highest level of intensity of logging level, even stand management which is essentially clear-fell. If these proceed they will destroy the amenity and ecology of the popular walk. (See map attached.)

The Beeripmo Walk is well known by bushwalkers and is promoted as local tourist attraction. The local tourism association describes the Beeripmo Walk as:

“Mount Cole and Mount Buangor is a great place to get away from it all. Camp the night at one of the many campgrounds in the parks and stroll after dark to spotlight the forest night life.....“Walkers can experience a variety of different forest environments from lush forests with ferns, falls with a gentle sound of running water, the brilliant green of the moss covered rocks, weather beaten rocky outcrops and magnificent vistas of the tablelands below and surrounding mountain ranges.”. <https://visitpyrenees.com.au/seeanddo/mount-cole-mount-buangor-park-walks/>

It is clearly a “...public use area”... and we believe that the intensification of logging will dramatically *undermine* the amenity, attractiveness of the walk and its potential as draw card for tourism.

According to the 2017—2018 and the 2018 -2019 Vic Forests *Annual Report*:

- Total revenue from Western Forests in 2017—2018 and 2008-2019 was \$700,000 (yes, less than \$1 million).ⁱ
- State funding to Vic Forests managed western “Community Forestry” in 2017-2018 was \$678,000 (yes, that’s a surplus of \$22,000 per annum).ⁱⁱ
- Total volume of timber generated from native forests was 21,000 cubic meters, or 1.5 per cent of total state production.ⁱⁱⁱ Mostly low grade uses such as fire wood.

Recommendations:

- **Considering the low economic value of forestry in the west and the potentially significant economic and social value of the Beeripmo Walk as a public use area, coupes which impact on the amenity and landscape values around the walk should be removed from the TUP.**

Examples of “Even Stand Management” at Mt Cole

Coupe 185-527-0101-2019



Coupe 185-517-0101 - 2019



4. Proposed Logging and Mt Cole Grevillia

Many of the proposed coupes have records of the Threatened Species - Mount Cole Grevillea. (*Grevillea montis-cole*), following a final recommendation by the Scientific Advisory Committee (SAC) to list Mount Cole Grevillea as a threatened species under the *Flora and Fauna Guarantee Act 1988* (FFG Act).

https://www.environment.vic.gov.au/data/assets/pdf_file/0020/435323/Mount-Cole-Grevillea.pdf

The Ministers of Environment and Agriculture reached a decision to support the listing of the Mount Cole Grevillea on 25 October 2019 and is now officially listed as threatened, making it legally at least Victoria's newest threatened species

https://www.environment.vic.gov.au/data/assets/pdf_file/0024/115827/20191114-FFG-Threatened-List.pdf

According to the Victorian Governments Threatened Species and Scientific Advisory Committee (SAC) "*Disturbances associated with logging history in particular are strongly implicated in the decline of this taxon {Mount Cole Grevillea}*". https://www.environment.vic.gov.au/data/assets/pdf_file/0020/435323/Mount-Cole-Grevillea.pdf



Mount Cole Grevillia: David Tatnall 2019

We note that Code of Forest Practice, Management Standards and Procedures, the Midlands have a prescription for the *Grevillea montis-cole* “Avoid disturbance to verified populations within the SMZ and GMZ.”, but this was developed before the species has been officially listed as threatened under the Flora and Fauna Guarantee Act.

We also note there are a range of prescriptions for similar Grevillia species in East Gippsland (**Colquhoun Grevillea** - *Grevillea celata*), Gippsland (Rock Grevillia – *Grevillea willisii*) and North East FMAs (Cobbera Grevillea - *Grevillea brevifolia*).

The prescription depends on the species range from “Establish a SPZ of 200 m radius over each verified population” or “Establish a SMZ of 250 m radius over verified populations and conduct a site inspection and detailed planning in consultation with DEPI to ensure the species is

adequately protected during timber harvesting Operations.”

Recommendations:

In light of the recent listing under the FFG Act of Mt Cole Grevillia:

- **A revised prescription should be developed, and an on-ground survey of this important species should be conducted as matter of urgency.**
- **No logging should be undertaken in area of potential distribution in and potential coupe removed from the TUP, until the survey is complete and new prescription developed.**
- **Alternatively, as an interim the prescription from Colquhoun Grevillea, in Gippsland should be applied “that is an SPZ of 200 meters should be established over each verified population”.**

ⁱ <http://www.vicforests.com.au/static/uploads/files/report-vicforests-annual-report-2018-wfccxhsjgpfj.pdf> page 13

ⁱⁱ <http://www.vicforests.com.au/static/uploads/files/report-vicforests-annual-report-2018-wfccxhsjgpfj.pdf> page 42

ⁱⁱⁱ <http://www.vicforests.com.au/static/uploads/files/report-vf-2017-deloitte-report-final-wfmtrpbbmtwu.pdf> page 11