

# Threatened Species Detection Report

## Mt. Cole State Forest Coupe 185-537-0104 (Archie's Lookout Road) Forest Report No, 2020-0066

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-Dates of investigation: 31 January - 2 February  
Date of report: 6/5/2020

## **Abstract**

Victorian National Parks Association representatives met with VicForests about their logging operations in the Pyrenees and Mount Cole State Forests on 10 February 2020.

After this meeting, it became apparent that the conservation of biodiversity values were not being met through their logging operations, and we highlight these concerns below under the “*Concerns Under The Code Of Practice For Timber Production 2014 (The Code) section.*

This report also includes a threatened species detection report from forest surveys that were undertaken by the VNPA between 31 January - 2 February 2020, within the Midlands Forest Management Area (FMA), specifically within the Mount Cole State Forest, Raglan.

Target species searched for within forest areas scheduled for logging, included the Mount Cole Grevillea (*Grevillea montis-cole* subsp. *Montis-cole*) and Grampians Bitter Pea (*Daviesia laevis*), both listed as threatened under the *Victorian Fauna and Flora Guarantee Act 1988* (FFG), and the Grampians Bitter-pea additionally being listed as vulnerable under the federal Environment Protection and Biodiversity Conservation Act 1999 (EPBC).

Both threatened species were detected within logging coupes scheduled in VicForests' Approved Timber Utilisation Plan (2019-2023), including within coupe 185-537-0104 (Archie's Lookout Road).

### **This report will document:**

1. Methods of survey work
2. Concerns under the Code of Practice for Timber Production 2014 (The Code)
3. Results of forest survey's
4. Discussion and recommendations

## 1. Methods of forest survey

- Volunteer surveyors were briefed and guided by professional ecologists and provided with ID sheets and skills
- Active search/ground based visual assessment forest surveys for threatened flora were undertaken. The Mount Cole Grevillea was the target species.
- Forest surveys were conducted in groups of 4, spread out 5 meters apart, walking within and adjacent to the VicForests' scheduled logging coupes detailed within this report.
- Each groups visually surveys for rare or threatened flora species.
- Digital cameras were used for recording species observed.
- Global Positioning Systems (GPS) were used for recording the location of plants found.
- Desktop survey were undertaken to search for records of rare and threatened flora species contained within the Victorian Biodiversity Atlas (DELWP) database.
- Additional locations of one of the investigation's target species, Mt Cole Grevillea, were also identified within the Atlas of Living Australia online database (<https://www.ala.org.au/>).



Volunteer Surveyor Inspecting Mt. Cole Grevilliea using ID sheets.

## **2. Concerns under the *Code of Practice for Timber Production 2014 (The Code)***

### **Lack of pre-logging surveys**

During a meeting on 10<sup>th</sup> February 2020 with VicForests representatives it was confirmed that pre-logging survey work was not being undertaken by DELWP or independent ecological consultants prior to the logging of coupes within the Mount Cole State Forest, and surrounding state forest areas in the Midlands FMA, or the Western Community Forestry Area generally.

It was further added that, any pre-logging 'checking' of coupes that is being undertaken, is being undertaken by VicForests foresters themselves, due to DELWP being 'busy'.

Our concerns remain around the lack of un-biased pre logging survey work occurring prior to logging operations, and that any forest surveys that are undertaken, are being done so by potentially un-qualified VicForests personnel.

These concerns are heightened given the area is home to the listed threatened species such as the endemic Mount Cole Grevillea (*Grevillea montis-cole* subsp. *montis-cole*), which has an extremely restricted range, Grampians bitter pea (*Davisea laevis*), the Powerful Owl (*Ninox strenua*), and Square-tailed kite (*Photinia isura*), all of which have population threatened by logging operations.

The lack of pre-harvest survey work conducted by persons with a conflict of interest or lack of adequate skills and knowledge raises issues under The Code, under 2.2.2 *Conservation of Biodiversity, Mandatory Actions, Addressing biodiversity conservation risks considering scientific knowledge* (page 34). This raises concerns in particular to:

- 2.2.2.2 *The precautionary principle must be applied to the conservation of biodiversity values.*
- 2.2.2.4 *During planning identify biodiversity values listed in the Management Standards and Procedures;*
- 2.2.2.5 *Protect areas excluded from harvesting from the impacts of timber harvesting operations,*

### **Lack of Coupe Plans**

A failure by VicForests to produce a Forest Coupe Plan that is compliant with the *Code of Practice for Timber Production 2014 (The Code)*, including in accordance with section 2.3 of the Code, as well as any requirements detailed within the Codes' incorporated Management Standards and Procedures document, would be a breach of the Code.

Such a failure would also contradict *VicForests' own Ecologically Sustainable Forest Management Plan*, which states that 'all coupes are described in detail and managed through a Forest Coupe Plan, and need to be made publically available.

A request by VNPA for a coupe management plan for coupe 185-537-0104 Archie's Lookout Road was made to VicForests on the 8 April 2020. No coupe plan has been provided or made publically available on VicForests website as of 6 May.

### **Logging in Mount Cole Grevillea habitat while Action Statement developed**

VicForests' 2019-2023 Timber Utilisation Plan has included a steep increase in the number of coupes located within the Mt. Cole State Forest including many coupes that are within the known distribution of the Mt. Cole Grevilliea. Specifically it includes 4 new coupes, and the expansion of 3 existing coupes.

The increase in intensity of planned logging types (from "Single tree" to high intensity "Even aged stand management") within Mountain Cole Grevillea's known distribution and hotspot areas is concerning and shows a lack of care.

This is alarming as in October, 2019 the Mt. Cole Grevilliea was listed under the FFG Act, after The Scientific Advisory Committee (SAC) recommended the species for listing due to "a likely environmental domain contraction in the order of 75%" and continued decline due to on-going threats.

The SAC's recommendation for listing the species as threatened, was accepted by the Victorian Government, and acknowledges the direct impact that logging will have on Mt. Cole Grevilliea stating, "On the basis of vegetation and land use patterns at Mount Cole, associated disturbances such as logging are strongly implicated in this decline."

A direct implication of the identified threats posed by logging on Mount Cole Grevillea requires responsive management action, as set out within *The Code* under section 2.2.2 *Conservation of Biodiversity, Mandatory Actions, Addressing biodiversity conservation risks considering scientific knowledge* (page 34). In particular, a precautionary approach must be taken to the management of Mount Cole Grevillea – under section 2.2.2.2 *The precautionary principle must be applied to the conservation of biodiversity values*.

It is apparent that the precautionary approach is not being adhered, pointing towards non-compliance of the code by VicForests. In our view, logging should cease immediately in known Mt. Cole Grevillea habitat, due to logging impacts identified above, risking this rare species persistence in the wild.

### **Logging in areas where Root Rot (*Armillaria* sp.) is present**

We also hold concerns around the presence of the Root Rot (*Armillaria* sp.) within the coupe 185-537-0104 and measures to stop the spread of the disease.

*The Code* states under 2.2.2.16 *Where Myrtle Wilt (*Chalara australis*), Cinnamon Fungus (*Phytophthora cinnamomi*) or Root Rot (*Armillaria*) is known to exist, apply appropriate measures to minimise the spread of these pathogens.*

Mt Cole is a well-known *Armillaria* hotspot, acknowledged during the meeting VNPA had with VicForests in early February this year. It was identified by VicForest that *Armillaria* was present in coupe 185-537-0104 Archie's Lookout Road.

We do not believe appropriate response measures have been undertaken to reduce the threat, spread or exacerbation of existing *Armillaria* Root Rot. When VNPA questioned VicForests at the meeting in early February, the response was that VicForests have no management plans for *Armillaria* sp. management at Mount Cole, but would seek advice from DELWP. No information has been made publically available, as of 6 May, 2020.

The West RFA area has the highest number of nationally threatened species of any of the RFA areas across the state, which is more than double East Gippsland and Central Highlands (*Assessment of matters pertaining to the modernisation of Victoria's Regional Forest Agreements 2019*).

Until VicForests can prove their compliance with The Code, we argue that all logging operations be ceased until such time, particularly in the highly fragmented, fragile and threatened forest of the west.

### 3.Results of forest surveys

Active searching for rare and threatened flora species, specifically the Mount Cole Grevillea and Grampians Bitter-pea, within and adjacent to coupe 185-537-0104 were sighted and recorded.

GPS waypoint locations marking the approximate minimum extent of the Mount Cole Grevillea population, centered around at the junction of Mount Cole Road and Camp Road, were recorded as well as the specific location of the Grampians Bitter-pea.

These waypoint locations are provided in the table below and the minimum population extent is displayed in the map below on page 7.

Location ID	Record type	Location (GDA94/UTM)
01	Mount Cole Grevillea approximate minimum population extent	54 H 701727 5866811
02	Mount Cole Grevillea approximate minimum population extent	54 H 701751 5866802
03	Mount Cole Grevillea approximate minimum population extent	54 H 701758 5866799
04	Mount Cole Grevillea approximate minimum population extent	54 H 701763 5866791
05	Mount Cole Grevillea approximate minimum population extent	54 H 701787 5866803
06	Mount Cole Grevillea approximate minimum population extent	54 H 701789 5866784
07	Mount Cole Grevillea approximate minimum population extent	54 H 701795 5866865
08	Mount Cole Grevillea approximate minimum population extent	54 H 701810 5866815
09	Mount Cole Grevillea approximate minimum population extent	54 H 701811 5866810
10	Mount Cole Grevillea approximate minimum population extent	54 H 701813 5866809
11	Mount Cole Grevillea approximate minimum population extent	54 H 701815 5866806
12	Mount Cole Grevillea approximate minimum population extent	54 H 701821 5866799
13	Mount Cole Grevillea approximate minimum population extent	54 H 701826 5866786
14	Mount Cole Grevillea approximate minimum population extent	54 H 701826 5866797
15	Mount Cole Grevillea approximate minimum population extent	54 H 701828 5866791
16	Grampians Bitter pea	54 H 702126 5866559

Photographs of the Mount Cole Grevillea population and the Grampians Bitterpea described above are displayed below.

The map below on page 7 are recommended minimum 200m buffers to exclude all logging activities that should be put in place to protect the Mount Cole Grevillea population and the Grampians Bitter-pea from disturbance.

The map also displays existing rare and threatened species locations contained within the Victorian Biodiversity Atlas (VBA) and additional Mount Cole Grevillea records from the Atlas of Living Australia online database (<https://www.ala.org.au/>). Recommended 200m buffers are also displayed for the locations of Mount Cole Grevillea contained within these databases.



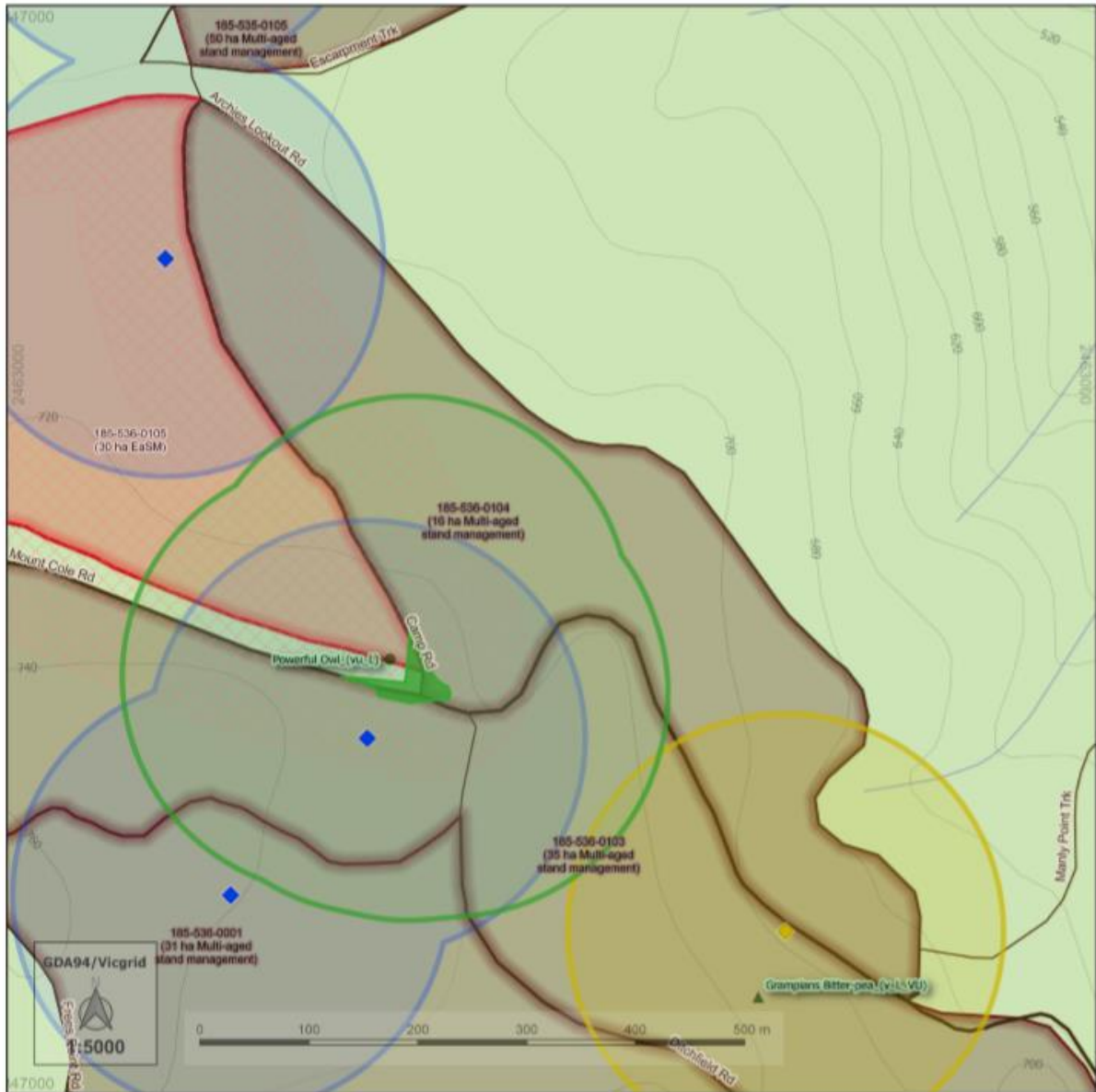
Mt. Cole Grevillea (*Grevillea montis-cole* subsp. *Montis-cole*) on road batter beside coupe



Grampians bitter pea (*Davisea laevis*) on road batter beside logging coupe



**Mount Cole forests - coupe 185-536-0104 (16.27 ha Multi-aged stand management) and conservation values**



**VNPA field trip survey records**

- Mount Cole Grevillea approx. min. population extent
- 200m buffer on VNPA survey Mount Cole Grevillea population
- ◆ Grampians Bitter-pea
- 200m buffer on VNPA survey Grampians Bitter-pea

**Existing Conservation Values**

- ◆ Mt Cole Grevillea records (multiple sources)
- 200m buffer on existing Mount Cole Grevillea records

Victorian Biodiversity Atlas records - 2 March 2018 (Rare or Threatened species excl Mt Cole Grevillea)

- VBA\_FAUNA25
- ▲ VBA\_FLORA25

**Public Land**

- Mount Cole forests boundary
- Public Land (current tenure)
- State forest

**Logging coupes**

- VicForests' 'Approved\_TUP\_Boundaries\_\_Dec\_2019'
- Even-aged stand management
- Multi-aged stand management
- Forest Management Operations

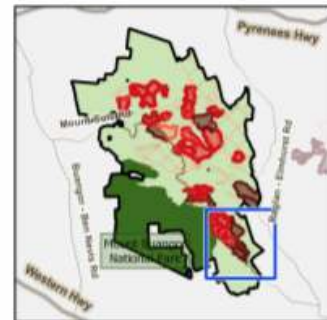
**Roads**

- 

**Watercourses**

- 
- Contours

**Mount Cole forests**



04 May 2020

## 4. Discussion and recommendations

Mount Cole State Forest is within the West Regional Forest Agreement (RFA) area under the Midlands Forest Management Area (FMA).

The *Assessment of matters pertaining to the modernisation of Victoria's Regional Forest* (Commonwealth of Australia, Victorian State Gov 2019) found that the West RFA area was high in conservation and biodiversity values.

The West RFA region has the highest number of national listed (EPBC Act) species of any RFA region in Victoria with 115 list species, more than double those in East Gippsland and Central Highlands. This includes the highest number of critically endangered species of any RFA region (16).

The West RFA region also has nine nationally listed ecological communities, the highest in the state along with Gippsland.

As displayed in the report above, current VicForest logging operations such as lack of independent qualified pre-harvest surveys, and lack of coupe plans are putting significant conservation values at risk in the west.

### **We recommend that:**

- VicForest cease all active logging within areas where Grampians Bitter Pea and Mount Cole Grevillea may be present.
- An urgent survey of coupe 185-537-0104 (Archie's Lookout Road) and the surrounding coupes be undertaken **as a priority**, prior to logging operations being undertaken in the area.
- Pre-harvest survey be conducted by an independent and suitably qualified persons with the survey results being publicly released.
- VicForest be investigated for breaches under *The Code* under *2.2.2 dealing with Conservation of Biodiversity, Mandatory Actions, Addressing biodiversity conservation risks considering scientific knowledge* (page 34) particularly:
  - *2.2.2.2 The precautionary principle must be applied to the conservation of biodiversity values;*
  - *2.2.2.4 During planning identify biodiversity values listed in the Management Standards and Procedures;*
  - *2.2.2.5 Protect areas excluded from harvesting from the impacts of timber harvesting operations.*

- *2.2.2.16 Where Myrtle Wilt (Chalara australis), Cinnamon Fungus (Phytophthora cinnamomi) or Root Rot (Armillaria) is known to exist, apply appropriate measures to minimise the spread of these pathogens.*