

## **Submission into the Future uses of our forest and immediate protection areas: Strathbogie Ranges and Mirboo North**

### **Victorian National Parks Association**

The Victorian National Parks Association (VNPA) welcomes the opportunity to comment on Future uses of our forest and immediate protection areas for the Strathbogie Ranges and Mirboo North Immediate Protection Areas (IPAs).

We note there is no public submission process, but though following our conversations with the eminent person panel, it may be helpful to outline some of the issues in writing.

The VNPA has been a community voice for the protection of Victoria's unique natural heritage for 70 years. VNPA is an independent, non-profit, membership-based group, which exists to protect Victoria's natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.

The VNPA has supported local community-run campaigns and advocated for Strathbogie and Mirboo North forests for decades and is keen to see a good outcome for Victoria's natural environment and the hard-fought community campaigns result in the protection of these two special places in perpetuity.

Determining future reservation should at its core match the values of the place and which uses and management best suit protection of those values in the long term. We also recognise the aspiration of traditional owners. There are four key issues of consideration in determining the future of these important places.

- Tenure and levels of protection
- Governance
- Planning
- Management

VNPA has concerns with the purposes and historic uses of Forest Parks, and discuss in detail some of these issues, and also highlight some opportunities, throughout this submission. We also provide comments on the specific forest areas.

Given that the Reforms to Public Land and the proposed new Public Land Act have not yet been finalised, VNPA takes the view that if Forest Parks are to be used, the Eminent Person Panel should take the opportunity to recommend a refinement of the purposes of forest parks, to be more consistent with VEAC State-wide review recommendations or alternatively use a different category of tenure.

# 1) Tenure and levels of protection

## 1.1 Protected Areas

*“Immediate Protection Areas contain very special native plants and animals and rich ecosystems, so it’s vital to determine **how best to protect them for future generations**, while ensuring Victorians can enjoy the many experiences our forests provide.”*

- Minister for Energy, Environment and Climate Change Lily D’Ambrosio, August 2021.

Getting the right land tenure and purpose for the protection of native bushland and forests on public land is vital to help secure the future of landscapes, ecosystems and to protect Victoria’s plants and animals which are found nowhere else on earth.

Land tenures and Protected Areas in Victoria are complex, reflecting the complexity of our ecosystems and the multitude of ways people impact natural areas and systems.

In our view, the right approach is to create a conservation network made up of different land tenures and management systems, matching the conservation importance of each area, its condition, and current and potential appropriate uses, in perpetuity.

The public land tenure system in Victoria is governed by a number of pieces of legislation, but also reflects a range of national and international treaties and policies, although there is a degree of uncertainty because land use categories are currently subject to review and change through the public land reform process.

Generally speaking, a protected area is a park or reserve with a primary aim of biodiversity conservation – creating areas in which our native plants and animals can survive and flourish. Internationally, this dialogue has been led by the International Union for Conservation of Nature (IUCN), which has developed globally recognised standard definitions and classifications for protected areas around the world and here in Victoria.

Permanently protected habitats on public land form the backbone of our society’s efforts to conserve our natural heritage and its rich biodiversity. Victoria’s national parks and conservation estate, protected by legislation, are a key community asset. They provide great benefit to people as well as to nature.

## 1.2 Tenure issues - Forest Parks, past experiences and concerns

The VNPA holds concerns about the tenure known as a Forest Park, which has two definitions under two sets of legislation and the management of current Forest Parks in Victoria (Table 1.).

Forest Parks cannot be considered to be Protected Areas under current legislation nor International Agreements, as these both explicitly allow extraction of resources such as minerals and timber products from natural areas.

VNPA’s experience with Forest Parks is that Forest Parks are not well regulated and cause damage to local ecosystems. Forest Parks would not be an appropriate category for the Mirboo North IPA due

to its high use by the community and high conservation values and would not align with the Strathbogie Forests due to their high conservation values and need to restore degraded areas rather than further degrade them.

The original intent of establishing Forest Parks was to allow for a diverse range of recreational uses which may be restricted in national parks such as horse riding, hunting and commercial uses such as bee keeping, and not as a loophole for future commercial logging. We understand the aspiration of Traditional Owner groups for Forest Park tenure is to allow for a Committee of Management over the two IPA sites, we will expand on our thoughts on Committee of Management in the **Governance** section below.

The VNPA has deep concerns about the current management of the Cobboboonee Forest Park and Otway Forest Parks. These areas being heavily logged for “Specialty Timber” which, in our view, contravenes the sawlog ban in the Forest Act and is inconsistent and potentially unlawful. As seen in the image below, large trees are being felled and milled in the forest parks.

VNPA’s view is that the logging of forest parks for commercial firewood, or poles and speciality timber would be inconsistent with ‘supplying a limited range of natural resource products’, depending on the amount, price, and end use of these products. As seen in Photos 1 and 2 below large trees are being felled for saw logs and “Speciality” timbers in these two Forest Parks.

The contemplated use of the Forest Park tenure as a holding tenure until future changes are made to the Public Lands Act (which could be as late as 2025) would potentially leave the sites open to future extraction of timber and minerals if a change of government were to occur. A tenure under the National Parks Act would allow for the land to be protected, and an agreement would need to be met between Parks Victoria and the Traditional Owners in the interim.

Section 4D of the National Parks Act 1975 relates to Traditional Owner agreement for natural resources. Subject to this provision, an agreement between Parks Victoria and Traditional Owner groups could allow for traditional use of plants, animals and other resources such as rock and ochre for example by Traditional Owners where it won’t have significant impact on the areas natural values.

### 1.3 The status and use of Forest Parks

*“This public land category was introduced by VEAC in its Angahook-Otway Investigation (2004), when it recommended the establishment of the Otway Forest Park. Forest parks are distinguished from state forest by the legislative prohibition on the granting of sawlog and pulpwood licences over the area. However, forest parks are distinguished from regional parks by not specifically providing for recreational use by large numbers of people and not being readily accessible from urban centres or major tourist routes.*

*Outside the VEAC process, the Cobboboonee Forest Park was established in 2008. Both the Otway and Cobboboonee forest parks are permanently reserved under the Crown Land (Reserves) Act but managed under specified provisions of the Forests Act. The forest park category in its current form differs from forest parks that were previously declared under the Forests Act. These were relatively small areas of reserved forest managed as part of the broader state forest estate; they form a group that would correspond more closely to a zone or sub-category within one of the current*

*public land use categories. However, this designation is effectively redundant now with most of the initially modest number having been subsumed into land units in other categories ten or more years before the introduction of the forest park category in 2004. Any that formally remain are managed in categories other than state forest in accordance with government-accepted recommendations, e.g. You Yangs Regional Park.”*

- Victorian Environmental Assessment Council, Statewide Review Discussion Paper, p 48

A detailed assessment of logging plans carried out by the VNPA, “*Western Forests and Woodlands at risk: An assessment of the ecological implications of a new timber utilisation plan for Western Victoria*” was published in June 2017. The report highlighted a range of inconsistencies between tenures and uses, in relation to Otway Forest Park and Cobboboonee Forest Park.

Below is an extract from the VNPA report, which outlines the significant environmental impacts caused to Otway Forest Park and Cobboboonee Forest Park under the ‘Forest Park’ designation, and provides valuable context and considerations for determining future uses of the Strathbogie Ranges and Mirboo North IPA’s.

*“Forest Parks: 9067ha of the Otway Forest Park and 738ha of the Cobboboonee Forest Park have coupes listed. All of the coupes in Cobboboonee Forest Park are listed as category 2 coupes, with the intent of the silviculture method noted as Stand Maintenance/ manipulation using a variety of methods. In the Otway Forest Park 2468ha is listed as category 2 coupes and 6590ha (73%) is listed as category 3, which is speciality timber or removal of individual stems. The 2005 legislation establishing the Otway Forest Park amended the Crown Land (Reserves) Act, establishing the purposes under section 42 (e) incl (iii) restricted use of forest parks to ‘supplying a limited range of natural resource products’. It also amended the Forests Act s 18A (3) to prohibit the issuing of licences under s 52 (1) etc for the purposes of sawlog or pulpwood production. The same definitions were applied to creating the Coobboboonee Forest Park.*

*In response to this issue being raised by the Victorian National Parks Association, VicForests replied on 27 April 2017 stating that: “In relation to the harvest of specialty timbers in Forest Parks, VicForests has maintained the same approach as the former Department of Environment and Primary Industries (now DELWP) prior to operations being transferred to VicForests. The harvesting of speciality timber is specifically provided for in the Great Otway National Park and Otway Forest Park Management Plan.”. we could find no reference to this.*

*The Great Otway National Parks and Otway Forest Park Management Plan 2009 (page 9), states in relation to the Otway Forest Park that the Act “specifically prohibits the granting of licences for sawlog or pulpwood production in the forest park, but allows licences to be granted for the ongoing harvest of firewood and minor forest produce”. Tables on pages 14-16 of the plan show that 70% of the forest park is zoned multi-use, which allows for “low intensity harvesting of selected trees for firewood...”. The other 30% is special protection zone, which still allows firewood collection but activities that may impact on natural and cultural features previously identified in the special protection zones are not permitted.*

*It is clear in the management plan and associated legislation that any timber harvesting would only be for firewood. However, it is not clear if this covers just domestic firewood collection or if it includes commercial firewood operations. The VicForests Timber Utilisation Plan lists all Otway Forest Park coupes as category 3 silviculture - the harvesting of speciality timbers through low*

*intensity single tree selection. It does not flag the coupes as category 4, 20 or 30, which are for firewood only coupes (see Table on page 15 for a description of VicForests silviculture categories).*

*The Cobboboonee Forest Park which is managed by DELWP, has nine proposed logging coupes, and is subject to a strategic parks management plan, the Ngootyoong Gunditj Ngootyoong Mara South West Management Plan 2015.*

*This plan only briefly mentions timber harvesting in the context of domestic firewood only, not commercial coupes. It states on page 97 that “Permit firewood collection for personal use in the forest park within designated domestic firewood collection areas, and only during firewood collection seasons”.*

- VNPA, *Western Forests and Woodlands at risk: An assessment of the ecological implications of a new timber utilisation plan for Western Victoria* (2017) p 32.

VNPA submits that the logging of forest parks for speciality timbers is likely to be inconsistent with the sawlog ban in the Forest Act and, in our considered view, could be unlawful.

The logging of forest parks for commercial firewood, or poles etc. would in the view of the Victorian National Parks Association also be inconsistent with ‘supplying a limited range of natural resource products’, but legal argument could depend on the amount, price, and end use of these products. The original intent of establishing these forest parks was to allow for a diverse range of recreational uses which may be restricted in national parks such as horse riding, hunting and commercial uses such as bee keeping, and not as a loophole for future commercial logging. VNPA submits that the clarifying the purposes of Forest Parks is essential to prevent unintended consequences and perverse conservation outcomes.

We also note that many of the current coupes in the Otways and Cobbobonee forest parks are in special protection zones. Under the Code of Forest Practice, special permission from the Office of the Conservation Regulator is required to harvest in a special protection zone, but none seems to have been given. Irrespective of the scale of the activity, VNPA emphasises that it is the ambiguity in the defined purpose of these forest parks, that has facilitated these outcomes.

See below for examples of 2017 and current coupes.

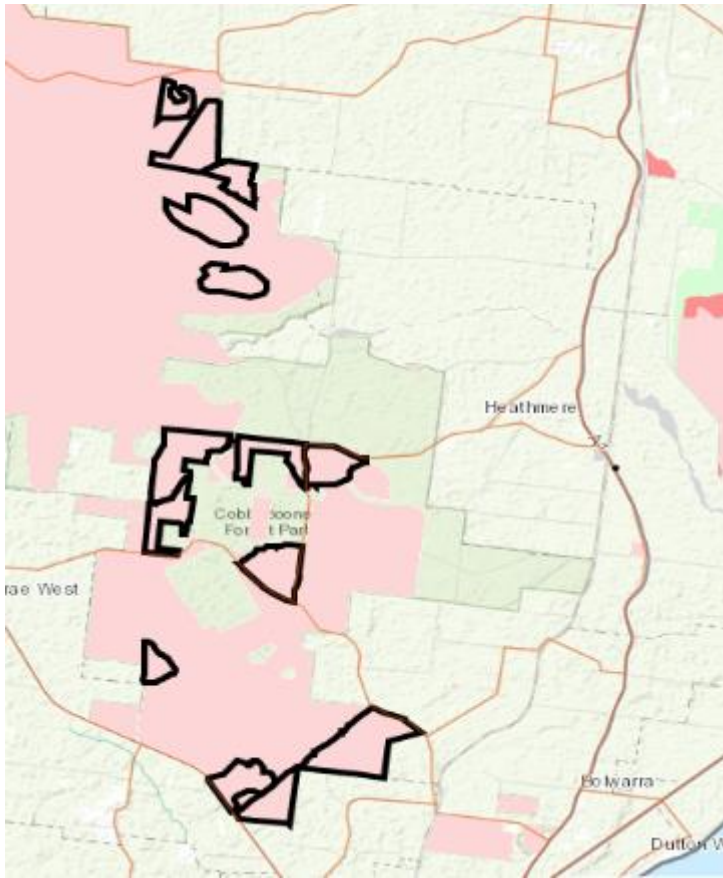


**Photo 1. Logging contractor milling a large old Blackwood/Acacia melanoxylon in the Otway Forest Park in April 2021. Photo. Wood and Wedge.**

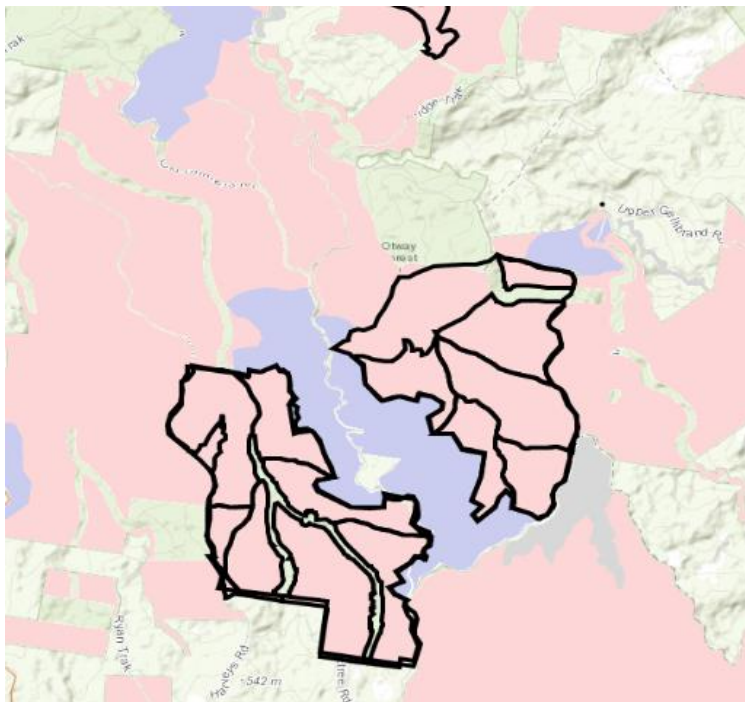


**Photo 2. Logging contractor with the large old Blackwood/Acacia melanoxylon in the Otway Forest Park that was later felled in March 2021. Photo. Wood and Wedge**

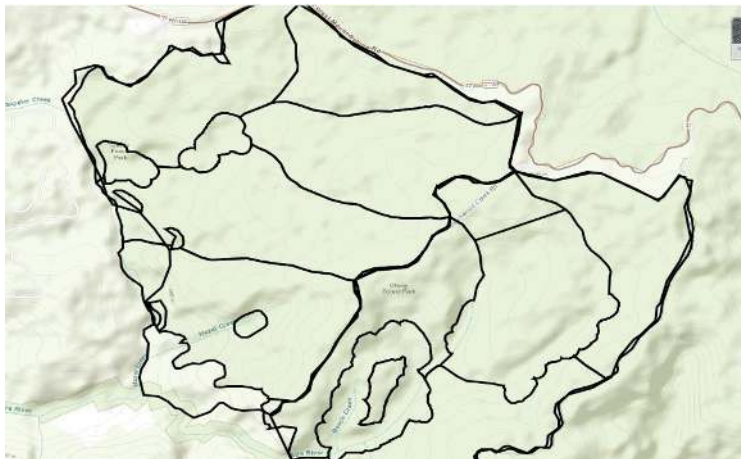
Current May 2022 TUP coupes in Cobbobonee Forest Park (Forest Parks + Special Protection Zones )



Current May 2022 TUP coupes in Otway Forest Park

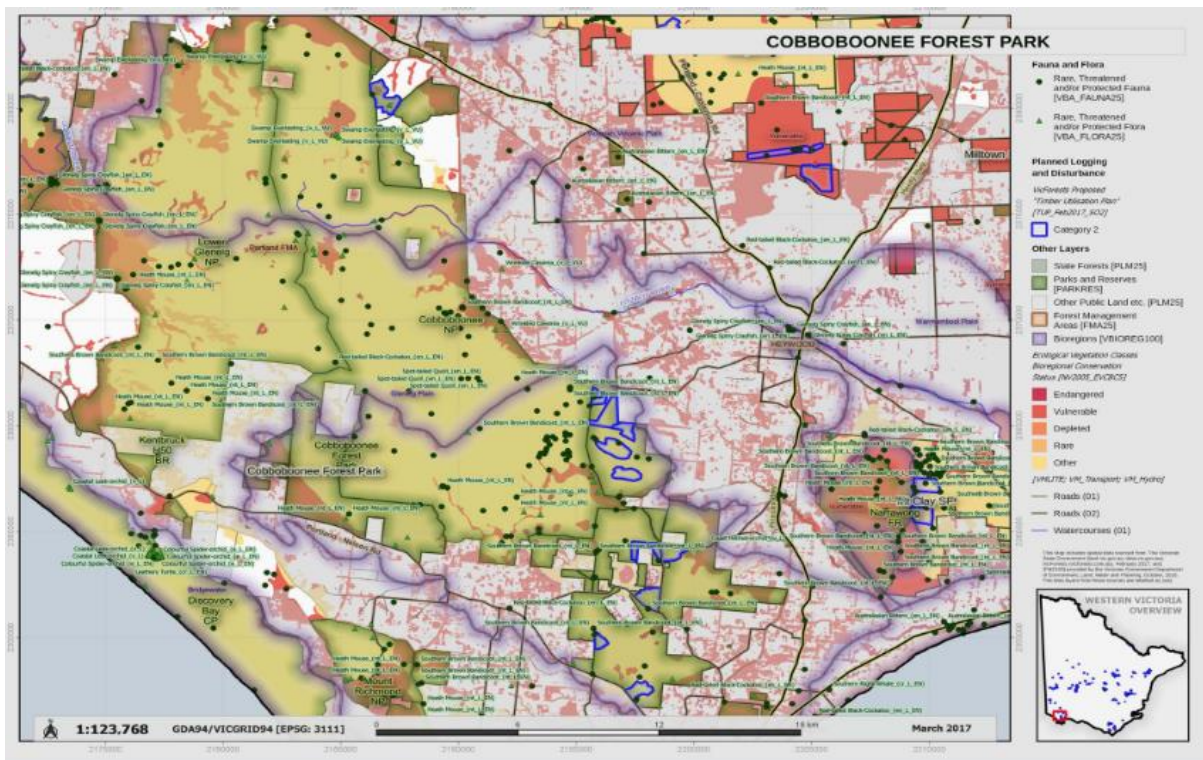


## Current May 2022 TUP coupes in Otway Forest Park



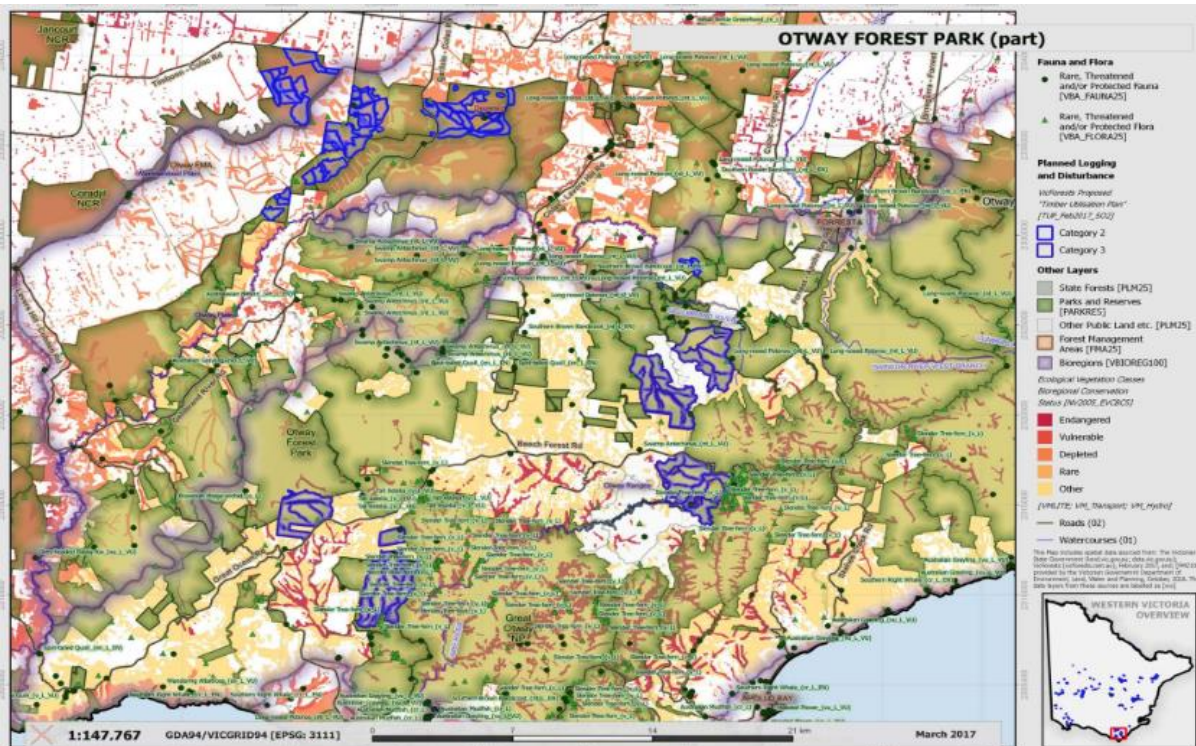
Source: <https://www.vicforests.com.au/vicforest-forest-management/ops-planning/where-vicforests-operates/tup>

## 2017 TUP coupes in Cobbooboonee Forest Park



## 2017 TUP coupes in Otway Forest Park





Source: <https://vnpa.org.au/wp-content/uploads/2017/06/Western-Forests-and-Woodlands-at-Risk-Appendix-II.pdf>

#### 1.4 Lack of Clarity of Forest Parks Purposes & Tenure

As part of VEAC's recommendations, metropolitan parks and forest parks were recommended to be included under the 'regional park' category of the new Public Land Act.

While we understand and see the benefit of maintaining separate categories for these two types of public land, we have some concerns about the purposes listed for the 'forest park' category of the new Public Land Act.

Due to the evolving nature of the reform process around public land there is great deal of uncertainty about purposes of some reserves. The VNPA have concerns particularly around "forest parks" for three key reasons.

- Forest parks are not protected areas
- The historical inconsistency in use and management of 'forest parks', (as discussed above).
- A lack of clarity about the competing purposes and uses of forest parks (see below).

Essentially, the currently legislated purposes of forest parks do not appear to have been applied effectively, with commercial harvesting for saw logs and fire wood still occurring. Additionally, a key part of the proposed purposes for forest parks, recommended by VEAC state-wide review have not been carried through in the proposed changes to the Public Land Act. In our view, this leaves those places that were intended to be protected now vulnerable to exploitation.

Specifically, VNPA takes issue with the removal of language in proposed purpose for forest parks in new public land act discussion paper, as not what was proposed by VEAC statewide review. The

original VEAC purposes provide much certainty and clarity such as “..minor resource extraction not incompatible with all of the above” and “ to protect the rights and interests of Traditional Owners, native title holders and Aboriginal Victorians, and their cultural values”.

The proposed Public Land Act ... proposes the key part of the purposes for “Forest Parks” as simply “Provide for a range of forest uses including the supply of forest products, but excluding sawlogs and pulpwood” which in our mind and experience leave the area open for inappropriate uses and extraction.

Given that the Reforms to Public land and the proposed new public land Act have not been finalised, **if Forest Parks are to be used, the Eminent person panel should take the opportunity to recommend a refinement the purposes of forest parks, to be more consistent with VEAC State-wide review recommendations** or use a different category of tenure such as Conservation Parks (or equivalent) or even Bushland Reserves.

The Forest Parks tenure also provides for “a range of forest uses including the supply of forest products, but excluding sawlogs and pulpwood”. This is in tension with the current purposes definition, due to the significant difference between the terms “a range” and “a limited range”. It is also in contrast to the VEAC state-wide review, which uses the term “minor extraction” with the additional proviso of “not incompatible with all of the above”.

**Table 1. Forest Parks purposes: confusion and uncertainty**

Source/Legislation	Purposes
<p>Authorised Version No. 128 Crown Land (Reserves) Act 1978/</p> <p>forest park means an area of land deemed to be permanently reserved under section 47D; 47D Land in Part 7 of the Fifth Schedule deemed to be forest parks</p>	<p>Each area of land described in a Division of Part 7 of the Fifth Schedule is deemed to be permanently reserved under section 4 for public purposes, being in particular for the purposes of;</p> <ul style="list-style-type: none"> <li>(a) providing opportunities for informal recreation associated with the enjoyment of natural surroundings;</li> <li>(b) protecting and conserving biodiversity, natural and cultural features and water supply catchments;</li> <li>(c) supplying a limited range of natural resource products.</li> </ul>
<p>VEAC State-wide review recommendation</p> <p>VEAC state-wide review draft proposal paper original recommended that Forest Parks and Regional Park be merged into a “Recreation Park”.</p> <p>The final report notes: <i>“This proposed category received much attention, with most concern expressed about the name rather than the purpose of the category. There was support for retaining the name ‘forest park’ for existing areas as efforts had been made to assist public understanding of the forest parks category and change might result in public confusion. It was considered important to be clear that sawlog and pulp log harvesting are prohibited in forest parks.”</i></p>	<p>VEAC Statewide Final Report Recommendation purposes for forest parks/ regional parks:</p> <ul style="list-style-type: none"> <li>• To provide opportunities for informal recreation for large numbers of people associated with the enjoyment of natural or semi-natural surroundings or semi-natural open space</li> <li>• protect natural and semi-natural landscapes and scenic values</li> <li>• to protect natural biodiversity to the extent consistent with the above</li> <li>• <b>to protect the rights and interests of Traditional Owners, native title holders and Aboriginal Victorians, and their cultural values</b></li> <li>• <b>to provide for <u>minor resource extraction not incompatible with all of the above, excluding sawlog and pulpwood harvesting</u></b></li> </ul>
<p>Realising the value of Victoria's public land: Renewing Victoria's public land legislation, (DWELP, 2021)</p> <p>Proposed the following definition for Forest Parks in new Public Land Category</p>	<p>Proposed Public Land Act Provide opportunities for recreation and education.</p> <ul style="list-style-type: none"> <li>• Protect the natural environment including biodiversity.</li> <li>• Supply water and protect catchments and streams.</li> <li>• Protect and maintain natural, cultural, or historic features and scenic landscapes.</li> <li>• <b>Provide for a range of forest uses including the supply of forest products, but excluding sawlogs and pulpwood.</b></li> </ul>

## 2) Park Governance

The aspirations of Traditional Owners for control and use of public land need to be respected and the questions around which model best suits will need to be an on-going conversation. The committee of management model, pointed to in the IPA VEAC reports, is still widely used for a lot of public land across Victoria especially in for coastal campgrounds and urban parks, however it is not without challenges.

One of the motivators for the foundation of the VNPA in the 1950's, was that the places called national parks like the Wilson Promontory were managed by Committees of Management, who were generally cash strapped and government outliers. This created a tension where extractive uses such as logging and grazing were required to fund management and infrastructure. This perverse tension, was one of the planks to encourage a centralised and consolidated conservation management agency, ideally properly funded by the state.

Under the current legislative models, the challenge to ensure access to consistent resources for management that will be faced by any Committee of Management, Traditional Owners or other stakeholders, is a real one.

Under the National Parks Act, land is managed by Parks Victoria on behalf of the state government, who can enter into management agreements with Traditional Owners. Specifically, Section 16A outlines the process for Management agreements with Traditional Owner Land Management Boards). This process can be either through co-management or joint-management of areas under the relevant provisions of the National Parks Act. VNPA notes that the legislated process may not meet the aspirations of all Traditional Owners groups but could constitute a good middle ground until further changes to the Public Lands Act are legislated.

The VNPA's experience with the use of Committees of Management in respect of public land, is that such arrangements can lead to poor ecological outcomes and neglect in terms of reduced government funding and management. In our view this is a result of the tenure not requiring management for conservation values and also attracting less funding.

There is a clear need for a conservation and cultural tenure which allows Traditional Owners to undertake cultural obligations, while also being guaranteed access to resources long term. Under the leadership of Traditional Owners, this will help ensure that the ecological health of natural areas is maintained, and cultural values are protected.

## 3) Park Planning

Park Planning provides a vital tool for land managers to manage conservation values, visitor pressures and appropriate recreational use of areas for natural areas and allows for priority-driven management. A robust park planning approach should be based on the natural and cultural values of the area and provide guidance for future works such as fuel reduction works, walking tracks and other visitor infrastructure in parks and natural areas.

Regional Parks and Forest parks do not require a specific management plan, which is only a requirement under the national park act. Sometime these tenures are included in regional or landscape park management plans. Under the Park Victoria Act, Parks Victoria have the power to undertake a management plan for the land they manage, regardless of the reservation status. However, to date, this has only been properly applied through Landscape Plans which include clusters of parks and or Master Plans some urban, metro or coastal parks.

Whatever the tenure that is decided upon, VNPA recommends that a well-resourced, collaborative and spatially explicit parks management plan is put in place for both Mirboo North and the Strathbogies.

## 4) Comments on Specific Forests

### 4.1 Strathbogies Forest

The Strathbogies Forest in northeast Victoria supports one of the healthiest known, and densest populations of Greater Gliders in the state. Most of the Strathbogies Forest's Greater Glider population is found in the vegetation type Herb-rich Foothill Forest, in State Forest, where its highest-quality habitat is being progressively degraded by a combination of timber harvesting and planned fuel-reduction burning. Greater Gliders are suffering a significant state wide decline.

Strathbogies Ranges State Forest is a biodiversity hotspot and supports Greater Gliders, and many other threatened species including the Eastern Horseshoe Bat, Brush-tailed Phascogale, Powerful Owl, and Murray Spiny Crayfish, Grey Rice-flower, Tall Leafy Greenhood, and Hairy Hop-bush

In the last 150 years, the Strathbogies Ranges have lost 74% of their native forest cover and at least three local species are known to have become locally extinct. In the future, the recovery of key species must be prioritised and supported, to improve their resilience to the impacts of climate change.

The 24,000 ha Strathbogies Forest is by far the largest remnant of native forest remaining in the Strathbogies Ranges and the last ecologically intact refuge for forest-dependent species. It also fills important gaps in representativeness of Victoria's reserve system. In the future, this forest will be important as a climate refuge for native species, for clean water supply, and for ecosystem services such as pollination.

#### Key points:

- The Victorian Government should enable the formal protection of the Strathbogies Forest under the National Parks Act, as a Conservation Park or other suitable category encompassing all of the existing State Forest and other associated public land.
- This forest should become a place where indigenous cultural values and practices underpin a flourishing forest ecosystem, one that becomes and remains part of the National Reserve System to the benefit of all Victorians.
- There is a huge opportunity to also support Traditional Owner cooperative or joint management of the area, with the relevant conservation protections in place.
- The Strathbogies Forest IPAs should be legislated as Conservation Parks under the National Parks Act to protect habitat and natural values of the forest and associated public land in perpetuity. This is an important legacy to leave for future generations.

- The IPAs should function as they were promised to, and that is to protect habitat and natural values from harmful activities such as mining, logging and firewood harvesting.
- This Greater Glider habitat should also be protected using a critical habitat determination (CHD) under the Flora & Fauna Guarantee Act 1988 FG Act and a subsequent habitat conservation order (HCO), whatever tenure is ultimately decided upon.

## 4.2 Mirboo North

The Mirboo North IPA (approximately 440 hectares) is part of the Strzelecki Ranges, one of the most heavily cleared bioregions in Victoria. It retains less than one third of the original extent of native vegetation and one of the lowest proportions in the protected area system, at just 1.5 per cent.

The Mirboo North State Forest provides habitat critical for the survival of many animals and plants threatened with extinction including the Flora and Fauna Guarantee Act listed Greater Gliders, Powerful Owls, Burrowing Crayfish, Lace Monitors, and Platypus as well as the iconic Superb Lyrebird.

The VEAC assessment concluded that given the small size of the Mirboo North IPA, Regional Park would be considered the most appropriate land use category for the IPA. In this regard, the VEAC recommendation is instructive;

*“If size and management viability were not a consideration, the land use category commensurate with the identified values of the Mirboo North IPA is Conservation Park. As a conservation park, under-represented Ecological Vegetation Classes in the Strzelecki Ranges bioregion would be added to the protected area system and the IPA would be managed for the protection of its natural values, while allowing an appropriate level of access and a range of recreational activities valued by the community.”*

– Victorian Environmental Assessment Council, Statewide Review Discussion Paper

Conservation Parks do not yet exist as formal land category, but are proposed to be added as new name for nature conservation reserves under the National Parks Act, and will be introduced as proposed reforms of National Parks Act and the creation of new Public Lands Act. Regional Parks are not be considered to constitute part of the formal protected area system.

With VEAC’s recommendation of the inclusion of the Mirboo North IPA into the existing Mirboo North Regional Park, alongside its finding that the area holds very high conservation value, it is clear that assurances must be made for future management.

Additionally, a Conservation Management Plan has been requested by the Mirboo North community to add ensure the timely and meaningful management of high conservation values and maintenance of ecological health of the Mirboo North IPA.

Preserve our Forests Mirboo North group have produced an extensive report on the values of the area found here which is highly supported by the Mirboo North Community.

## Key points

- Mirboo North IPA should be incorporated into the existing Mirboo North Regional Park with a greater emphasis on conservation of the values within the area including water production, carbon storage and wildlife and ecosystem conservation.
- There is an opportunity to prioritise Traditional Owner cooperative or joint management of the area, with the relevant conservation protections in place.
- This forest should become a place where Indigenous cultural values and practices underpin a flourishing forest ecosystem, one that becomes and remains part of the National Reserve System to the benefit of all Victorians.
- Whatever the final land tenure adopted, the key habitat for the Greater Glider in Mirboo North should be protected using a critical habitat determination (CHD) under the Flora & Fauna Guarantee Act 1988 FG Act and a subsequent habitat conservation order (HCO).
- The Mirboo North IPA and surrounding bushlands are part of the Strzelecki Ranges bioregion, one of the most heavily cleared bioregions in Victoria with one of the lowest proportions in the protected area system at 1.5 per cent. VNPA emphasises the urgent need to manage more of this bioregion for its conservation value.
- The Mirboo North IPA and surrounding bushland supports a wide array of rare and endangered wildlife such as the Greater Glider, Powerful Owl and Lace Monitor, without the area being protected for conservation these species will continue in their population declines that could result in regional extinctions.
- The Mirboo North IPA and surrounding Regional Park needs a conservation management plan to assure the protection of the high conservation values in the area.
- The IPAs should do as they promised to do, and that is to protect habitat and natural values from harmful activities such as mining, logging and firewood harvesting.
- Due to the fragmented and highly cleared nature of the East Gippsland Plain bioregion, and its under representation in the formal reserve system, consideration should be given for full VEAC investigation of the whole bioregion – as recommended previously by VEAC in Native Vegetation Investigation and the State-wide Review.

## 5) Conclusion

The VNPA supports the tenure of Conservation Park for the Strathbogie Forest, although the south west part of the Strathbogie IPA area is more degraded and has existing mining operations. The tenure of Forest Park cannot be supported as this will allow extraction and damage to natural areas, which goes against the commitment of government that these areas are protected.

The VNPA supports the incorporation of the Mirboo North IPA into the surrounding Mirboo North Regional Park, but highlights the need for a VEAC or VEAC-like assessment of the Strzelecki Bioregion to help incorporate more areas of public land into the Protected Areas estate and expand protection and management for conservation values in the Strzelecki bioregion. Regional Parks are not recognised as Protected Areas, and are instead more recreational-use focussed, which sometimes means that their high conservation values do not receive the appropriate management they need to ensure that these values are maintained.

There is a need for Management plans for both of the sites, to allow zoning of high conservation

values and areas for low impact-passive recreation. Management plans must also include and protect cultural values as identified by Traditional Owners.

There is also a need for a recognised plan that sees the areas currently leased for pine plantations returned to the public and restored to its natural condition. The pine plantations currently fragment the IPA areas and will impede the ability of these areas to adapt to the rapidly changing climate.

We acknowledge the reports from the Taungurung Land and Waters Council (TLaWC) and the Gunaikurnai Land and Waters Aboriginal Corporation (GLaWAC) and their aspirations to be have greater recognition and rights over management of their lands and waters including the culturally significant the sites within the IPA areas.

VNPA support the same outcome of protection and care of natural areas and the plants and animals that call them home and greater recognition of First Nations connection to country and rights as the Traditional Owners of the IPA areas and surrounding public lands.

VNPA supports Aboriginal Title over parks and reserves on public land and support co-management and joint management of these areas and would like to see these agreements strengthened by the State government and Parks Victoria to reflect the aspirations of First Nations communities while also ensuring the protected nature of the areas.

The VNPA would like to see land tenure categories that maintains the area as a recognised Protected Area such as Conservation Area which can protect natural values and ecosystem function and exclude harmful activities such as mining and native forest logging while incorporating Taungurung aspirations and enable Taungurung to directly manage land, but in way that allows access to management resources on sustained basis, but also protects the values longer term.

Thank you for considering this submission.

If you would like further information please contact Jordan Crook, Nature Conservation Campaigner on 0401635573 or [jordan@vnpa.org.au](mailto:jordan@vnpa.org.au)