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Hollow-bearing Alpine Ash tree (*Eucalyptus delegatensis* subsp. *delegatensis*), Rubicon State Forest on Dry Creek Hill Road *WOTCH*

SUPPORT FOR LISTING ASSESSMENT

Alpine Ash forests of mainland Australia

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The Director
Ecological Communities Section
Department of Climate Change, Energy, the Environment and Water (DCCEEW)
Canberra ACT 2601

Alpine Ash forests of mainland Australia – support for listing assessment

Dear Director,

The Victorian National Parks Association (VNPA) welcomes the Draft Conservation Advice for Alpine Ash forests of mainland Australia. We write in support of the Department's proposal to list this ecological vegetation community as Endangered under the Commonwealth *Environment Protection and Biodiversity Conservation (EPBC) Act 1999*. We acknowledge this as an important step to the protection and restoration of this iconic Australian ecosystem.

Please attend to the attached document, which provides you with additional information in the Victorian context to support this listing assessment. More specifically, we provide information regarding additional indicators of high conservation value areas, additional threats this vegetation community faces and provide recommendations for their mitigation.

Currently, key threatening operations to Matters of National Environmental Significance (MNES) are occurring widespread across Victoria in the absence of referrals and approvals by proponents under the EPBC Act, resulting in clear detrimental impacts to MNES. This includes native forest logging on private land and fire prevention works outside of emergency periods such as strategic fuel break works (maintenance and creation), planned burning, so-called hazardous tree removals and salvage logging.

To protect the Alpine Ash forests of mainland Australia, we recommend there be a clear requirement for proponents to refer proposed threatening operations (such as listed above) which intersect with this Endangered ecological vegetation community. This should apply to both private and state government agencies. This will help ensure the protection and restoration of this iconic community is not jeopardised by a proponent's failure to refer damaging works.

We look forward to a well-funded Recovery Plan for the Alpine Ash forests of mainland Australia, to guide its protection and restoration efforts using the best available ecological science and expertise.

Attachment: *Alpine Ash Forests of Mainland Australia_Additional Information_VNPA.pdf*

Please contact myself at blake@vnpa.org.au if you require any further information.

Yours Sincerely,

Blake Nisbet
Nature Conservation Campaigner

Alpine Ash forests of mainland Australia:

Additional Information and Recommendations for listing assessment

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Consultation Questions on areas of high value
• Are there other features that identify occurrences of high conservation value?

In our view, the presence of large and/or hollow-bearing trees in patches of Alpine Ash forests should be added as an indicator of high conservation value for this ecological community. The presence of these key ecological structures provides critical denning/nesting habitat for threatened fauna associated with this vegetation community, such as the Leadbeater's Possum, Greater Glider, Gang Gang Cockatoo and much more [1]. The presence and density of these large and/or hollow-bearing trees therefore has a strong influence on the diversity of arboreal fauna likely to occur throughout patches of this vegetation community.

The significance of such trees is supported under Table 1 of the Draft Consultation Advice which identifies patches containing >1 large living *Eucalyptus delegatensis subsp. delegatensis* (>60 cm dbhob*) per 1 ha as Class A or Class B habitat. The Consultation Advice goes on to state that "*Classes A and B represent those parts of the ecological community that retain the highest diversity and most intact structure and ecological function and therefore have the highest chance of persisting in the long-term*". [2]

Under the current drafting for indicators of high conservation value, it's inferred that patches containing large and/or hollow-bearing trees would qualify (e.g. through species richness, presence of nationally listed threatened species, presence of a range of age cohorts), but not explicitly stated. There is a risk that patches of Alpine Ash forest containing large and/or hollow-bearing trees could be excluded from identification as high conservation value, despite representing some of the most ecologically intact and important examples of this vegetation community.

In our view, areas of Alpine Ash forests containing large and/or hollow-bearing trees must be given strong consideration when assessing the potential impacts of proposed actions under the EPBC Act, or when determining priorities for protection, recovery, management and funding. We recommend the following addition to the list of indicators for high conservation value [3]:

Recommended Additional Indicator: "*Patches containing large (>60 cm dbhob) and/or hollow-bearing Eucalypt trees, whether live or dead*"

The indicator should not be restricted to *Eucalyptus delegatensis subsp. delegatensis* trees as to allow for the inclusion of other large and/or hollow-bearing Eucalypt species which occur and represent high conservation value denning/nesting structures throughout this vegetation community (e.g. Mountain Gum, Candlebark etc). Likewise, it should not be restrictive to live

[1] As indicated in Appendix A2 – Fauna (Draft Consultation Advice)
[2] Draft Consultation Advice, page 18
[3] Draft Consultation Advice, pages 18-19

trees as some associated nationally listed threatened fauna species (such as the Leadbeater's Possum) show preference to dead hollow-bearing trees for denning/nesting.

Figure 1. Hollow-bearing Alpine Ash tree (*Eucalyptus delegatensis subsp. delegatensis*) photographed in the Rubicon State Forest on Dry Creek Hill Road (Wildlife of the Central Highlands, 2021).

Consultation Questions on threats

- Are any important threats missing from Table 2? Are any of the listed threats more, or less, severe, or of different timing or scope than currently proposed for this ecological community? Please provide details and additional information sources.

Activities associated with timber harvesting – Additional Information

The Victorian Government ceased native timber harvesting in state forests in 2024, but a loophole allowing for such logging to occur on private land remains wide open. Since the end of native forest logging on public land in Victoria, the VNPA have observed an uptick in logging on private land and are remotely monitoring logging on a handful of private properties. This is largely being done using existing historical permits, but also includes new permit applications lodged to and regulated by local governments. [4]

Regional Forest Agreements (RFAs) show that across Victoria's Central Highlands and Gippsland regions, there is approximately 1,373 ha of Alpine Ash forests [5] on private land, none of which is protected through private land covenants. This highlights the scale on which Alpine Ash forests are threatened by private native forest logging in Victoria.

[4] Victoria logging: Why the state's 'zombie' industry won't die
[5] EVCs 38 and 39

The VNPA is not currently aware of active logging occuring on privately owned Alpine Ash forests in Victoria, however detecting and monitoring such operations are extremely difficult. This is due to multiple factors such as restricted public access and the fact that operations are largely being approved without advertisement to the public for consultation (in the case of historical permits). Private land logging is occuring widespread but is largely sliding under the radar of the public eye.

Up to this point, private land native forest logging has been exempt under the EPBC Act under Victoria's RFAs, which were set to be scrapped last month in December 2024 [6]. In the absence of this exemption, proposed native forest logging in Alpine Ash forests on private land should be referred to the Commonwealth and assessed for impacts on Matters of National Environmental Significance (MNES) under the EPBC Act, such as this proposed endangered ecological vegetation community.

However, we know from public meetings and consultation that Victoria's local governments will be leaving the responsibility of referring private logging operations to proponents [7]. In our view this highlights the need for a clear requirement for private proponents to refer proposed native forest logging operations which intersect with this Endangered ecological vegetation community. This will help ensure that the protection and recovery of Alpine Ash forests and other MNES are not jeopardised by a proponents failure to refer.

Recommendation: Proposed native forest logging operations on private land should be subject to a clear requirement for referrals and approvals through s 70 of the EPBC Act where they intersect with Alpine Ash Forests.

Figure 2. Drone imagery of private land native forest logging in Victoria (Anonymous, 2023).

[6] Victorian Regional Forest Agreements
[7] 2024.08.27 Open Council Meeting Minutes.pdf, page 9

Activities associated with fire management works – Additional Threat

In our view, the impacts from preperational fire management operations outside of emergency periods should be explicitly identified and listed as an additional key threat facing the Alpine Ash ecological vegetation community.

Victorian Alpine Ash forests have been impacted by widespread fuel break and planned burning operations in recent decades, a trend that is projected to continue (if not increase) in the future.

As the Age reported late last year, "*Under an expanded "strategic fuel break" program quietly unveiled earlier this year, the Department of Energy, Environment and Climate Action (DEECA) plans to construct 6000 kilometres of fire break tracks, up to 40 metres wide, through state forests and national parks by 2030 – up from a previous target of 1447 kilometres*." [8] It's likely that this program for new strategic fuel breaks intersects with the Alpine Ash forests ecological community.

Citizen scientists from Wildlife of the Central Highlands (WOTCH) Inc have documented the impacts of 2024 fuel break operations and so-called hazardous tree removals in the Yarra Ranges National Park. Some of the sites assessed were Alpine Ash forests as defined under the Draft Conservation Advice.

Alpine Ash forests assessed along Theodore Road (Cambarville) found that so-called hazardous tree removals from Victoria's Department of Energy, Environment and Climate Action (DEECA) to maintain "strategic fuel breaks" resulted in the marking and removal of the only two hollow-bearing trees in an otherwise single-age cohort of Alpine Ash forests that did not contain hollows. This patch of Alpine Ash forest meets the description of Class A habitat, habitat which is critical to the survival of the ecological community under the draft consultation advice. These operations have likely jeopardised some high conservation value elements of this patch, including the presence of multi-aged cohorts and its ability to support nationally listed threatened species which rely on tree-hollows (e.g. Greater Glider, Gang Gang Cockatoo).

[8] Victoria logging: Why the state's 'zombie' industry won't die

Figure 3 (a-b). One of two hollow-bearing trees removed by DEECA in Alpine Ash forests of the Yarra Ranges National Park along Theodore Road, as part of fire prevention and so-called hazardous tree removal operations (WOTCH, 2024).

These so-called strategic fuel break and hazardous tree removal works are being undertaken by DEECA in the absence of assessment for (and mitigation of) potential impacts to MNES by the Commonwealth under the EPBC Act. This is resulting in direct impacts to MNES. A clear example of this was reported on last year when DEECA cut down known denning and nesting trees for the Greater Glider during strategic fuel break maintenance which resulted in the direct mortality of Endangered Glider(s). [9]

In regards to planned fuel reduction burning, a spatial analysis commissioned by the VNPA revealed that 12,140 hectares of Alpine Ash forests [10] were impacted by fuel reduction burning between 2007 and 2021 (a 15 year span). The potential impacts of these planned burns include so-called hazardous tree removals (which often targets large and/or hollow-bearing trees) and those described under the key threatening process "*Fire regimes that cause declines in biodiversity*".

Further, under the guise of fire prevention, DEECA are conducting widespread salvage logging operations across Victoria's forests. Most recently these works are targeting areas affected by the 2021 storm events that led to windthrown trees in the Dandenong Ranges National Park, upper Thomson Catchment and soon-to-be Wombat-Lerderderg National Park. The VNPA is not currently aware of any planned or active salvage logging works occuring within Alpine Ash forests, but this remains an ongoing threat to the ecological community as fires and storms are projected to continue impacting upon Alpine Ash forests.

Figure 4. Salvage logging operations undertaken by DEECA in Shrubby Foothill Forest of the Dandenong Ranges National Park following windstorm events in 2021 (VNPA, 2024).

[9] Greater glider found dead next to Victorian Department of Environment tree-felling site
[10] EVCs 38 and 39

As is the case with all of the above fire prevention works, these are occuring in the absence of any referrals and approvals through the Commonwealths EPBC Act. As the proponent of these works, state government agencies should be referring these operations to the Commonwealth for assessment and (where appropriate) approvals prior to conducting works, to ensure that MNES are protected and threats are appropriately mitigated in accordance with the EPBC Act.

Recommendation: Activities associated with fire management works outside of emergency periods should be should be identified and listed as an additional threat to this ecological vegetation community. More specifically, these threats include a range of activities including planned burning, strategic fuel breaks (creation & maintenance), so-called hazardous tree removals and salvage logging or 'storm recovery'.

State government agencies proposing large-scale fire prevention works outside of emergency periods should be subject to a clear requirement to refer proposed threatening operations (such as listed above) which intersect with this Endangered ecological vegetation community. For example, a proposal for storm-salvage logging or the creation/maintenance of strategic fuel breaks must be referred to the Commonwealth for assessment under s70 of the EPBC Act if they intersect with Endangered Alpine Ash forests.

Poor Management of Trees – Additional Threat

The VNPA would like to draw your attention to another threat facing Alpine Ash Forests of Mainland Australia, being poor tree management.

DEECA's Reseeding Giants program is an example of poor tree management which threatens the integrity of Alpine Ash trees and forests. This program aims to reseed areas where Ash species were killed after the 2019-20 bushfires or past logging. It involves collecting seeds from trees on public land, [11] possibly including national parks and other protected areas. According to a promotional video published in October 2020, to obtain seeds *'the climber will climb the tree. He will declimb to a prescription. About 50 per cent of the crown is taken, as individual branches* (our emphasis added)'. [12]

It is well-known in the arboriculture industry that a tree should have no more than one third of its canopy removed at a time to avoid stressing and harming the tree as well as affecting the natural growing form of the tree. [13] Poor pruning can lead to early mortality. It can create poor form and structure. Exposed cut surfaces are left susceptible to pathogens and disease which can enter the heartwood of the tree. In this instance, a program aimed at the recovery of Ash species in fire affected and logged areas may lead to significant injury to trees. These injuries can affect their future vigour and life expectancy, and in some cases, even lead to trees unnecessarily becoming hazards.

[11] DELWP (2020b) Reseeding Giants – reseeding the Ash forests, https://www.youtube.com/ watch?v=BEfCE22q8aU
[12] DELWP (2020b).
[13] AS 4373-2007 Pruning of amenity trees, Standards Australia, 2007.

Recommendation: Poor Management of Trees be identified and listed as an additional threat to this ecological vegetation community.

It is critical that public land managers understand and implement AS [14] 4373 2007 Pruning of Amenity Trees and AS 4970-2009 Protection of Trees on Development Sites to manage our trees in a safe, evidence-based way and avoid producing tree hazards in the future.

Appendix 1. Additional Photographs

Figure 5. The second of two hollow-bearing trees removed by DEECA in a patch of Alpine Ash forest in the Yarra Ranges National Park along Theodore Road, as part of fire prevention and so-called hazardous tree removal operations (WOTCH, 2024).

[14] Australian Standards

Figure 6. The remaining age cohort of non-hollow-bearing Alpine Ash trees in the Yarra Ranges National Park along Theodore Road, following fire prevention and so-called hazardous tree removal operations (WOTCH, 2024).