

Dear Chief Fire Officer and Mr John Bradley,

CC: Office of the Conservation Regulator, The Hon Steve Dimopoulos



## **Populations of state-listed endangered plants recorded within areas proposed for log removal operations and post-logging burning, in the Dandenong Ranges National Park**

Please accept this Technical Memo from the Victorian National Parks Association (VNPA) and Southern Dandenongs Landcare Group (SDLG) about the recordings of state-listed endangered plants in areas proposed for log removal operations, off-track heavy machinery disturbance and post-logging burning, in the Dandenong Ranges National Park.

In 2023, The VNPA & SDLG have documented over 300 *Platylobium reflexum* plants – which are listed as endangered under the Flora and Fauna Guarantee Act (FFG Act) - in areas proposed for operations by Forest Fire Management Victoria (FFMV) and VicForests. These plants are often referred to more commonly as the Victorian Flat-pea. The Victorian Flat-pea now joins the Powelltown Correa in the growing list of endangered plant species under the FFG Act which are threatened by the proposed operations.

We note from previous correspondence that populations of the Victorian Flat-pea were not raised by FFMV representatives during their survey of the sites for biodiversity values to protect during log removal operations or post-logging burns.

We are concerned that the proposed operations will likely cause direct and indirect damage to these endangered plants by off-track heavy machinery disturbance, soil compaction, weed introduction, changes to the composition of natural light in the understory and inappropriate successive burning events.

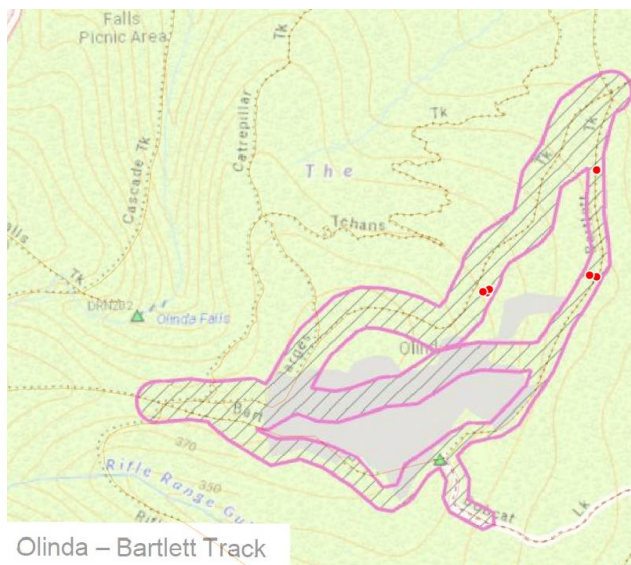
Section 4B of the FFG Act sets out a clear duty and obligation on public authorities to consider potential biodiversity impacts when exercising their functions. We also note that the Scientific Advisory Committee has just made a preliminary recommendation that *Salvage Logging of Burnt Forests* be specified on the list of Potentially Threatening Processes under the FFG Act. The impacts of salvage logging in storm-impacted forests are highly alike. *Loss of coarse woody debris from Victorian native forests and woodlands* is currently listed as a potentially threatening process.

No information has been made public to outline how FFMV/DECCA will ensure their duty is being performed and that an action taken (or to be taken) does not threaten a listed taxon or community. This is leading to a high level of distrust in the community toward these and future works by FFMV and the Department of Energy, Environment and Climate Action (DEECA).

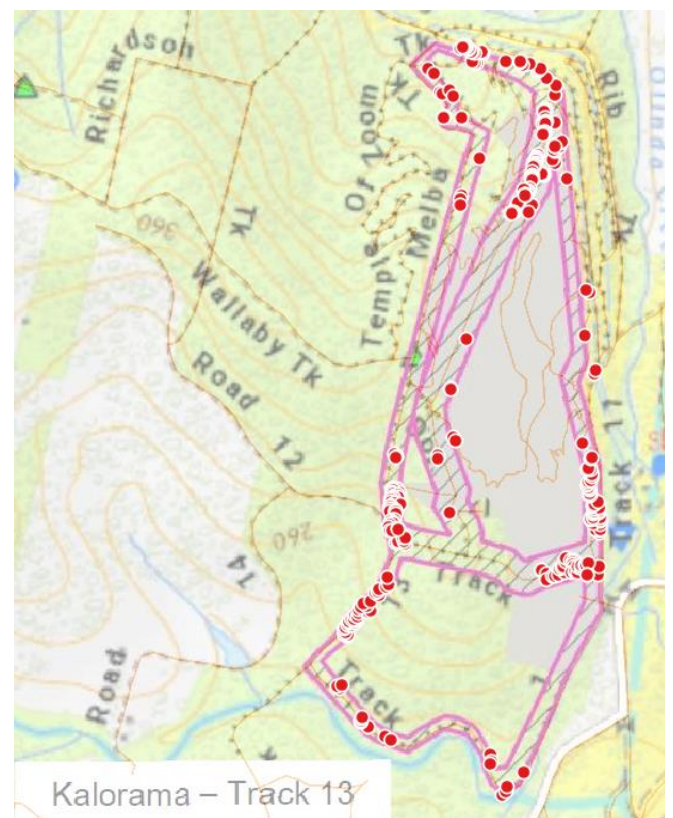
### **Recommendations**

- As a minimum, FFMV and VicForests must establish machinery exclusion zones around the populations as mapped in Maps 1 and 2
- To adequately protect and allow for growth of the populations, the machinery exclusion zones should extend up to at least 200m of recorded Victorian Flat-pea plants

- Any post-logging planned burning must be done so in accordance with the Tolerable Fire Interval for the endangered Victorian Flat-pea and all plants in the vegetation communities present on-site, based on the best available scientific knowledge
- For any log piles which have been placed on top of Victorian Flat-pea plants; the bottom logs should be left in-situ and the top logs should be removed in smaller pieces to avoid further disturbance to the underlying plants (see Figure 2)



**Map 1. Victorian Flat-pea plants documented by the VNPA and SDLG at the Olinda – Bartlett Track Site**



**Map 2. Victorian Flat-pea plants documented by the VNPA and SDLG at the Kalorama – Track 13 Site**

Results – Sample images of Victorian Flat-pea plants below. More plants were photographed during field surveys and can be provided upon request.



**Figure 1. Sample of photograph series for Victorian Flat-pea (*Platylobium reflexum*) plants. Plant on the right; flowering part of the plant on the left showing reflexed bracteoles as a key identifying feature**





**Figure 2. Photograph of endangered Victorian Flat-pea (*Platylobium reflexum*) plant(s) which have been damaged by preliminary logging operations at the Kalorama – Track 13 site, in the Dandenong Ranges National Park.**