VICTORIAN NATIONAL PARKS ASSOCIATION
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Rainforest gully, Errinundra National Park. *JUDITH DELAND/FLICKR*

SUBMISSION TO THE

Victorian Government Great Outdoors Taskforce

Submission 1: Key policy issues for on-going management of state forests in east Victoria

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Table of contents

About us

The Victorian National Parks Association (VNPA) is an independent member-based organisation, working to improve protection of Victoria's biodiversity and natural areas, across land and sea. VNPA has been actively working to protect Victoria's wildlife and biodiversity for over 70 years.

Summary

The public forests of eastern Victoria support some of Victoria's finest remaining high-conservation value forest and have some of the highest biodiversity values in the state. They're filled with rainforests, clean rivers, waterfalls, rare plants and animals. They're a stronghold for many rare and threatened plants and animals, once common across the state.

Victoria has an obligation to play its part in creating a comprehensive, adequate and representative protected area system that covers 30 per cent of Australia by 2030. With approximately 18 per cent of land protected, Victoria is not currently a national leader. The Great Outdoors Taskforce (GOT) revised terms of reference do not mention or even acknowledge international and national agreements and priorities and are inconsistent with international and national policy directions including those which Victorian Government have agreed to.

The direction of the process is seemingly a policy frolic ignoring even its own environment policies and long-standing approaches. Without permanent protections the current approach leaves some of the most important habitats in the state open for the return of logging.

The current framework for state forests is outdated and ecologically damaging. Transitioning these lands into secure conservation tenures, integrating Indigenous leadership, and implementing robust biodiversity protections for state forest are essential to preserve Victoria's natural heritage. By addressing these gaps and implementing evidence-based reforms, Victoria can lead the way in sustainable forest management and climate resilience.

This submission addresses why the government should properly consider new national parks but also the much-needed policy reforms for the management of state forests. A second submission will be provided which looks at the values of the state forest in the investigation area in detail.

Issues, discussion and recommendation are provided around the following issues:

- International and national context and policy settings including delivery of international & national 30x30x30 commitments.
- State policy and community context.
- State forest reform issues including purposes of state forests, governance of the management of state forests, forest management plans.
- Forest zoning systems, Regional Forest Agreements (RFAs).

- The need for clear and enforceable prescriptions needed to protect threatened wildlife and habitats.
- Invasive species management such as feral cats, feral horses, livestock grazing, feral deer control.
- Impact of recreation on ecological processes and wildlife including the need for native fish refuges and managing impact of prospecting on natural and cultural values.
- A range of state forest ecological management Issues are also highlighted including:
    - failed regeneration after logging
    - protecting big and old trees
    - firewood collection and habitat loss
    - roads and tracks
    - the role biodiversity monitoring and citizen science.

There are many other issues which require detailed consideration including on-going management of old growth and the detailed implantation of State and Federal threatened species action and recovery plans, management of climate change impacts, invasive weeds to name a few, which have not been covered in this submission. Key points, conclusion and recommendation from this submission are included below

Key points – international, national and state policy context

- The GOT terms of reference do not mention or even acknowledge international and national agreements and priorities and are inconsistent with international and national policy directions, including those which Victorian Government have agreed to.
- Combined principles outlined in the National 30x30 Roadmap and the National Reserve System Strategy include the delivery of Comprehensive & Adequate Reserve System (CAR) reserve system, which should as a minimum guide the assessment and categorization of public land in Victoria throughout the investigation area of the GOT.
- VNPA support indigenous management of public land for conservation including co management, joint management and appropriately constituted and legally protected indigenous protected areas.
- Conservation Areas (OECMS) under the national roadmap should be used to recognize existing levels of protection such as RASMAR sites or water catchment areas. Simply claiming state forests as OECM would not in our view fit the criteria, under existing legal and management arrangements.
- Neither the original nor revised GOT terms of reference make no reference to the implementation of the state's biodiversity plan, Biodiversity 2037.
- More than three times as many people visit national parks and state parks than visit state forests currently, which dispels the myth that they are somehow locked up
- Statewide polling shows an overwhelming (80 per cent +) majority of Victorians support the creation of new national parks.
- Without permanent protections such as those under the *National Parks Act* or other protected area tenures, forests will remain vulnerable to the return of logging.

- If the government refuses to consider tenure change, the other key policy enablers which allow the return of native forest logging should be removed

Key points: State forest reform

Leaving the state forest land tenure available in current state for a future government with different policy prospective will not only waste the significant investment in forest industry transition but also lead to continued loss of habitat, damage to water catchments and loss of carbon sequestration

- Ideally state forests should be abolished and replaced with a land tenure that excludes extractive industries such as native forest logging and mining. Clear reforms to the legal status, oversight and governance of state Forests are needed if they were to be retained
- The reform process must also center First Nations communities by embedding Traditional Owner (TO) knowledge and management practices into forest governance. Co-management agreements and funding for Indigenous-led ecological surveys should be legislated as core components of this shift
- Currently there is no clear accountability for management of state forests for all of its values, the current focus appear to largely fire or hazard reduction related, rather than all values and uses in a comprehensive manager.
- A Director of State Forest or similar with clear responsibilities, accountability and public face for community to deal with the many management issues, should be considered. These would both inform and work hand in hand with a zoning system.
- If state forests are to be retained they need a management plan, which is not timber harvest focused, has up to date biodiversity information, and includes plans to manage all aspect of state forest values and uses, including recreation uses, fragmentation, roading, bee keeping sites, fire refuges, invasive species and so on as well informing a zoning system
- It is unlikely that the informal reserve system (or forest zoning system), in its current state, would meet even the basic benchmarks for the complementary Other Effective area-based Conservation Measures areas (OECMs) as agreed to by Victoria and all other States and Territories in June 2024
- Unless there is a substantial strengthening of the legal force of the zoning system to cover other damaging activities, improve permanency or the government creates new legislated formal protected areas, there is a risk in Victoria that our reporting against the Comprehensive, Adequate and Representative (CAR) reserves system as articulated under National Forest Policy and RFAs, will in fact go backwards.
- Recreational activities and other uses must be balanced with ecological protection through an updated and expanded evidence-based zoning system outside of protected areas.
- Government should undertake a scientifically robust process to determine and assess the threats to forest-dependent wildlife & habitats throughout state forest
- In addition to a zoning systems and State Forest Use Code of Practice should be developed with prescriptions and protections which are clear, enforceable and regulated by an independent regulator allows for third party information and data from citizen scientists to be incorporated as well as new science or changes in circumstances.

Key points: Feral and invasive animals

Cats

- Feral and free roaming domestic cats have an immense impact on local wildlife and negatively impact ecosystem integrity. To effectively manage feral cat numbers and protect wildlife and functioning ecosystems:
- Felixer traps must be made available for use on all public and private lands in Victoria.
- Victoria must also implement areas of public land where the goal is to eradicate feral cats such as areas with high densities of small marsupials and reptiles or ground living birds to name a few.

Feral Horses

- Feral horses are listed as impacting at least 25 threatened alpine flora and 14 threatened alpine fauna species, including the broad toothed rat and rare alpine orchids in areas of state forest as well as national parks.
- The absence of feral horse management in state forests is due to horses being considered 'livestock' in the Forest Act and is jeopardising gains made through control works undertaken by Parks Victoria in the Alpine National Park and NSW land managers Across the state border.
- Feral horses must be declared an Established Pest under the *Catchment and Land Protection Act 1994* (CaLP Act) and protections for them removed from the *Forest Act,* or new tenure or zoning system created which allows for humane control.

Cattle

- Soil erosion and vegetation damage and disturbance in the alpine regions of Victoria can be caused by cattle grazing, which leads to detrimental impacts on a wide range of ecosystem processes,
- The GOT should recommend that stock grazing is immediately removed from areas above at least 1000 meters at a minimum and indicate a plan to phase out stock grazing in high conservation areas of state forests, in line with relevant Action Statement under FFG Act.

Feral Deer

- Feral deer are implicated in the decline of rainforest and other threatened ecological communities across Victoria including state forest in eastern Victoria.
- Recreational shooting alone has been unable to keep control of feral deer number in Victoria with feral deer now out of control across Victoria. and are impacting over 1000 species of native wildlife.
- Deer will need to be managed on an on-going basis in state forest if key biodiversity areas and habitat are to be protected along with biosecurity. Key reforms include
    - Feral Deer be removed from the *Wildlife Act 1975* and placed on the *Catchment and Land Protection Act 1994* as a pest animal
    - Remove seasonal hunting restrictions on feral deer across Victoria
    - Where possible eradicate populations of feral deer from high conservation areas or where deer numbers are low for example Red Deer populations in the East of the State

- Recognizing areas of high biodiversity importance and recognizing these areas in state forest management plans and or zoning systems.
- Enhance funding for deer control programs and partnerships

Key points: Impact of recreation on ecological processes and wildlife

Understanding recreation Impacts

- Impacts of recreational activities on water quality, wildlife behavior and breeding, off-road vehicle use leading to increased soil erosion, compaction and water quality issues have been highlighted in international and national studies but the local understanding of the impact of recreational activities is generally low and needs to be increased in order to make informed decisions about land management.
- It is imperative that the GOT commissions an independent study on the impact of recreation on Victoria's wildlife and ecosystem functions in order to inform decisions about the future of Victoria's public lands

Native fish protection

- Victoria is a hot spot for decline of native freshwater fish populations with a high number of native freshwater fish species threatened with extinction.
- The GOT should consider trout-free safe havens for vulnerable native fish from the spread of invasive trout and exotic fish species, this could be included as part of potential forest zoning system for high conservation areas

Prospecting and fossicking

- Recreational prospecting can be low impact, but it is clear that it can also result in damage to natural and cultural heritage values, especially in waterways, but also in other vulnerable environments
- Some forms of prospecting and fossicking can impact on water quality and water way biota and species such as, freshwater invertebrates and vertebrates can be effected.
- There are only very basic rules about where you can go prospecting and fossicking and the type of equipment you can use to ensure vulnerable areas and waterways aren't disturbed. The rules in Victoria are less explicit when compared to NSW
- There is an extensive list of over 250 rivers and streams in Victoria were recreational fossicking and prospecting are not allowed but it is unclear if it is actively enforced
- This could be strengthened by providing interactive spatial data on the area involved similar to NSW and as part of a broader state forest zoning system. This would give clear guidance to prospectors to avoid sensitive areas.

Key point: State forest ecological management issues

Restoration of failed logging coupes

- Restoration will need to be undertaken for significant areas of failed regeneration, and should be done using best available ecological approaches which use the National Standards for the Practice of Ecological Restoration in Australia as well as incorporating local indigenous knowledge.

Protecting large old trees

- Principles aimed at projecting significant trees across Victoria's public land estate. should be incorporated into relevant policy, regulation and operating procedures and planning, including the Code of Practice for Timber Production or it predecessors such as Code of Practice for State forest and its associated procedures across public and private land, planning and acknowledgement within the Joint Fuel Management Programs (JFMP), Code of Practice for Bushfire Management on Public Land (2012) and Strategic Bushfire Management Plans and Burn Plans, and any other policies leading to a decline of large old trees

Domestic firewood

- There is a large amount of evidence to suggest the removal of coarse woody debris such as from firewood collection from state forests is impacting threatened wildlife and habitats. The state forest areas covered by the GOTs investigation contains many forest-dependent wildlife, including threatened species, which rely on and are threatened by, the removal of course woody debris and the ecological functions which they provide.
- If domestic firewood collection is to be permitted in areas of the GOTs investigation area, there is a need for enhanced planning, monitoring, education and regulation by DEECA.
- Throughout the GOTs investigation area, the issue of illegal firewood take is occurring widespread. This threatens the safety of recreational forest users and tourists, whilst also destroying key natural and cultural values, including threatened species populations and habitats
- More enforcement officers monitoring our forests (both actively and remotely), and greater penalties for non-compliance. Enforcement resources could be prioritised in accordance with a zoning system, to protect areas of key natural, cultural and recreational significance from impacts.
- Establishment of firewood lots ideally mixed species should be encouraged by government on private land to transition firewood collection out of public forests.
- The government should assess the opportunity for community firewood lots, on already cleared public land.
- Consideration should also be considered for appropriate pricing and permitting of firewood from state forest to reduce the illegal take for designated domestic fire areas

Reducing the impact of roads and tracks

- The continued management of an extensive road and track system take resources away from popular and useful roads and tracks and is leading them to become washed out and rutted beyond use by most forest visitors. There are thousands of kilometers of tracks in state forest, many established for logging purposes, which is no longer required. Rarely when new tracks are established are old tracks removed. There need to be overhaul of track management in state forest including:
    - Statewide assessment of the impacts of recreational activities on ecological functions, wildlife welfare and river and stream health.
    - A needs-based assessment of the track network, which ones are need, which can be rehabilitated which can be made management tracks that allow low impact recreation such as walking, mountain bike rising, horse rising
    - Greater numbers of Rangers and OCR officers on the ground to conduct greater compliance and education on road rules across national parks and reserves and state forests
    - Point of purchase education of 4WD owners as to their legal obligations and track classification scale
    - An assessment framework to understand which vehicle users legitimately need large and chunky (Muddys, 36 inch +) or an extra charge to pay for track maintenance needed after use by these tryers
    - Illegally created tracks for 4WDs, trail bikes and mountain bikes must not be legalised. New tracks must go through a legitimate planning process

Biodiversity monitoring and citizen science

- Biodiversity monitoring is critical to understanding the health of state forests and throughout the GOTs investigation area, citizen science has and continues to play a massive role in in protecting forests, but this needs to be supported including:
    - Reform is needed to establish, fund and implement a centralised biodiversity monitoring and reporting program which is transparent and scientifically independent
    - The program should be expanded to monitor and report on biodiversity in the face of all threatening activities in state forests (including fire management and recreational activities)
    - The program should monitor and report on the response of biodiversity and ecosystem services (e.g. carbon & water sequestration) to ecological restoration efforts in degraded forests.
    - Importantly, biodiversity monitoring should be undertaken pre and post threatening processes, so that scientifically rigorous mitigations can be established, implemented, assessed and adapted for at-risk wildlife and habitats.
    - Mitigations should be developed through a scientifically robust process to determine and assess each threat to forest-dependent wildlife & habitats throughout state forest.
    - Prescriptions and protections should be clear, enforceable, adaptive and regulated by an independent regulator, and should include landscape-scale and detection-based zonings

- Systems and processes should be established and managed to incorporate data from citizen scientists to inform management and trigger ecological protections
- Informed decision-making for biodiversity and conservation outcomes should be enhanced through reforms that speed up functionality of the VBA, or alternatively, Government should consider information from other databases with equal weight.

1. Introduction and overview

The decision to phase out native forest timber harvesting on public land was applauded by conservation groups in Victoria.[1] It offers one of the greatest opportunities in the states' history to meet its international, national and statewide commitments to establish a comprehensive, adequate and representative protected area system and permanently protect our unique environment.

In 2022, nations around the world committed to protecting 30 per cent of lands, freshwaters and oceans by 2030 (the 30x30 target) in networks of protected and conserved areas, and ensuring the networks were representative and well-connected as part of the Convention on Biological Diversity's Kunming-Montreal Global Biodiversity Framework[2]. Australia has made a commitment to protecting 30 per cent of lands and 30 per cent of oceans at the national level, with the support of all Australian states and territories including Victoria. [3]

That opportunity was clearly acknowledged when the creation of what would become the Great Outdoors Taskforce was announced by Premier Daniel Andrews in his press release on 23 May 2023: '*The Government will establish an advisory panel to consider and make recommendations to government on the areas of our forests that qualify for protection as National Parks….'* [4]

The then Environment Minister said on Twitter that *'It also means the largest expansion to our forest reserve system in our state's history…'* [5]

It was reinforced repeatedly including by current Minister for Environment Steve Dimopoulos' press release on 1 April 2024: *'The Taskforce will also explore which areas need to be protected to safeguard threatened species, areas that qualify for protection as National Parks…*'. [6]

The original terms of reference for the Great Outdoors Taskforce also clearly specify this important opportunity: 'Identifies priority areas for reservation change, including state forest areas: i. that could be declared as national park or another park category under the *National Parks Act 1975*'.

The same commitment was also specified in the State budget papers *'Funding is also provided for the Great Outdoors Taskforce to make recommendations to the Government on the future of how State forests are managed, including the 1.8 million hectares of State forests previously subject to the timber harvesting allocation order. The scope of the taskforce includes:• areas of State forests that qualify for protection as National Parks…'* [7]

[1] https://vnpa.org.au/victorian-nature-community-elated-over-faster-end-to-native-forest-logging-in-the-state/
[2] https://www.cbd.int/gbf
[3] Environment Ministers Meeting 21 October 2022 Agreed Communiqué: https://www.dcceew.gov.au/sites/default/files/documents/emm-communique-21-oct-2022.pdf
[4] https://www.premier.vic.gov.au/delivering-certainty-timber-workers
[5] Environment minister Ingrid Stitt, May 23, 2023 - @Ingid Stitt. Twitter/X
[6] https://www.premier.vic.gov.au/have-your-say-future-our-forests
[7] Victorian Budget 2024/25 (Service Delivery, Budget Paper No. 3) page 32.

Support for protection of biodiversity in Victoria's forests was also supported during 2018-19 consultation for the 'Modernisation' of the Regional Forestry Agreements (RFAs) that engaged with almost 3000 Victorians via online surveys and in person events[8].

When asked 'How can we protect and improve our forests for all Victorians' the survey results showed that people wanted to:

- protect native forests from timber harvesting (52 per cent)
- biodiversity protection and restoration (42 per cent)
- increase engagement with Aboriginal community (28 per cent)
- support industry and employment (27 per cent)
- increase access to the forests for human connection (26 per cent)
- create the Great Forest National Park and Emerald Link (24 per cent)
- increase recreational use of forests (10 per cent).

Support for increased protection of biodiversity increased with younger people.

Figure 1. Public support for the protection of forests during 2018-19 consultation [9]

Disappointingly, the Victorian Government and Great Outdoor Taskforce (GOT) have now backflipped breaking original promises. *'…the Taskforce will not be making any recommendation for large-scale changes to land tenure, including not creating any new national parks'* [10] and has produced a new vague term of reference.

The GOT revised terms of reference do not mention or even acknowledge international and national agreements and priorities and are inconsistent with international and national policy directions, including those which Victorian Government has agreed to. The direction of the process is seemingly a

[8] Future of our Forests Feedback Report - Phase 1 Engagement December 2018 - March 2019, DELWP https://www.delwp.vic.gov.au/__data/assets/pdf_file/0032/426947/FutureOfOurForests_FeedbackReport.pdf
[9] Feedback Report - Phase 1 Engagement December 2018 - March 2019, DELWP
[10] https://www.deeca.vic.gov.au/futureforests/future-forests/great-outdoors-taskforce (accessed 16/01/2025)

policy frolic ignoring even its own environment policies and long-standing approaches. Without permanent protections the current approach leaves some of the most important habitats in the state open for the return of logging.

There is clear support for better protection in formal protected areas by the Victorian community as a whole, but there seems to be a loud minority opposed to such protections – a small subset of state forest users with interests often linked to extraction such as logging and prospecting.

Victoria has an obligation to play its part in creating a comprehensive, adequate and representative protected area system that covers 30 per cent of Australia by 2030. With approximately 18 per cent of land protected, Victoria is not currently a national leader. A failure to contribute to protected area expansion would mean that Victoria is expecting other Australian states and territories to do the work for it.

To reinforce what has been lost in this process, the area of investigation by the GOT is one of the most biodiverse areas in Victoria.

These forests support some of Victoria's finest remaining high-conservation value forest and have some of the highest biodiversity values in the state.[11] They're a stronghold for many rare and threatened plants and animals, once common across the state**.** English botanist David Bellamy described East Gippsland forests as 'the most diverse range of temperate forest ecosystems on Earth'.

They're filled with rainforests, pristine rivers, waterfalls, rare plants and animals. They're some of the last strongholds for threatened and endangered wildlife like Long-Footed Potoroo, Glossy Black Cockatoo, Greater Glider, Spotted-tailed Quoll, Masked and Sooty Owls, Lace Monitor and Giant Burrowing Frog.

As the climate changes, these larger intact forests will also play increasingly important roles as carbon sinks and habitat sanctuaries for many of our threatened plants and animals. The best way to protect these forests is by giving them national park status.

In places like East Gippsland, it is one of the few places in Victoria to retain the majority (around 80 per cent) of pre-European extent of native vegetation cover. Around 83 per cent of the region is in public ownership, mainly as state forests, national and coastal parks. These intact habitats support many different plants and animals, with records of over 5000 species. This includes at least 35 species of plant that are unique to the region.[12]

Either way the current framework for state forests is outdated and ecologically damaging. Transitioning these lands into secure conservation tenures, integrating Indigenous leadership, and implementing robust biodiversity protections for state forest are essential to preserve Victoria's natural heritage. By

[11] https://veac.vic.gov.au/investigations-assessments/previous-assessments/investigation/conservation-values-of-state-forests-assessment-report
[12] https://eastgippsland.rcs.vic.gov.au/themes/biodiversity/

addressing these gaps and implementing evidence-based reforms, Victoria can lead the way in sustainable forest management and climate resilience.

Investigation Area

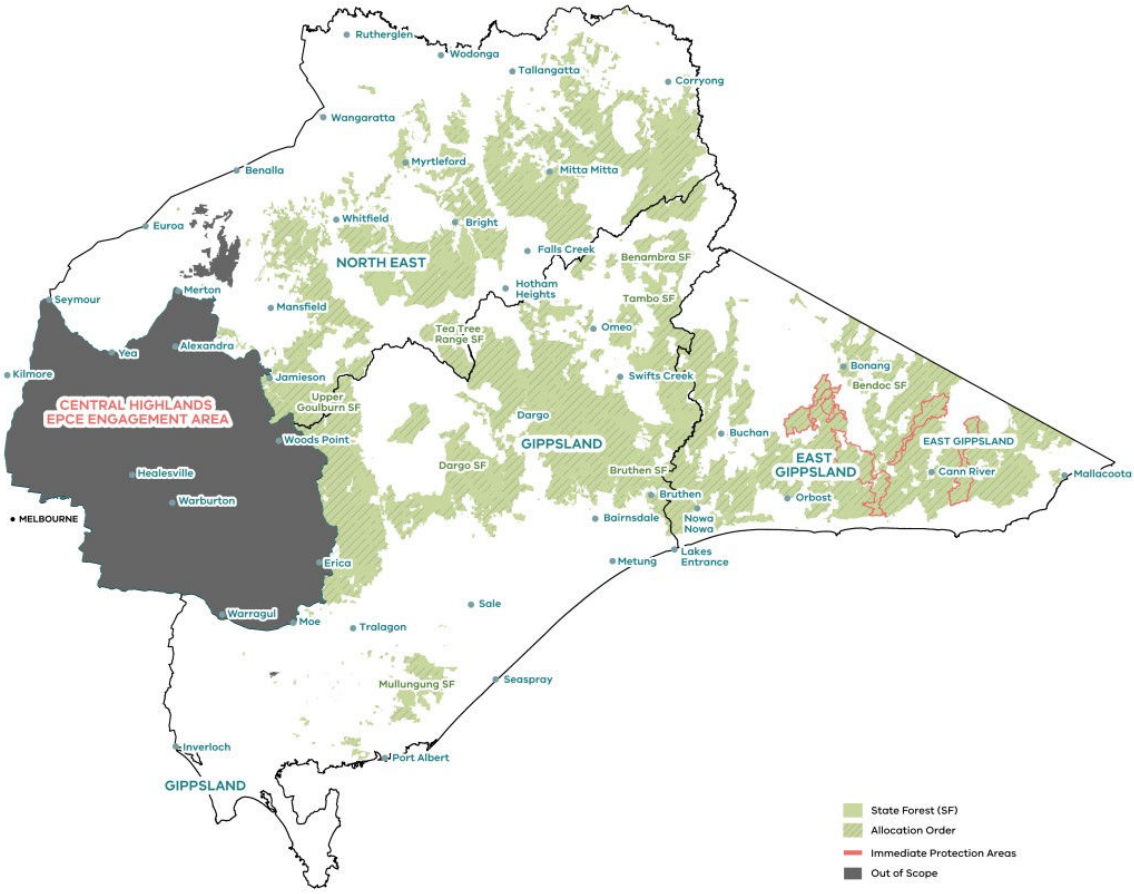

Figure 2. Great Outdoors Taskforce Investigation Area (DEECA, 2024)

This submission addresses why the government should properly consider new national parks but also the much-needed policy reforms for the management of state forests. A second submission will be provided which looks at the values of the state forest in the investigation area.

Issues, discussion and recommendation are provided around the following issues:

- International and national context and policy settings including delivery of international & national 30x30x30 commitments.
- State policy and community context.
- State forest reform issues including purposes of state forests, governance of the management of state forests, forest management plans.
- Forest zoning systems, RFAs.
- The need for clear and enforceable prescriptions needed to protect threatened wildlife and habitats.

- Invasive species management such as feral cats, feral horses, livestock grazing, feral deer control.
- Impact of recreation on ecological processes and wildlife including the need for native fish refuges and managing impact of prospecting on natural and cultural values.
- A range of state forest ecological management Issues are also highlighted including:
    - failed regeneration after logging
    - protecting big and old trees
    - firewood collection and habitat loss
    - roads and tracks
    - the role biodiversity monitoring and citizen science.

There are many other issues which require detailed consideration including on-going management of old growth and the detailed implantation of State and Federal threatened species action and recovery plans, management of climate change impacts, invasive weeds to name a few.

The diverse and significant ecological values of the region will be discussed in detail in a separate submission (Submission 2).

2. International and national context and policy settings

In June 2021, Australia joined the High Ambition Coalition for Nature and People – a body that sought to drive international consensus on 30x30. In December 2022, the Australian Government committed to the Convention on Biological Diversity's Kunming-Montreal Global Biodiversity Framework (GBF), and the 30x30 commitment was backed by all Australian state and territory environment ministers in October 2022.

https://report.30by30.org.au/the-report/

Figure 3. Australia's policy commitment journey to 30x30 [13]

[13] PATHWAYS TO PROTECTING 30 PER CENT OF LAND BY 2030 (Fitzsimons Et Al., 2023), Page 11

The National Reserve System (NRS) is the centerpiece of nationally coordinated efforts to conserve our unique and globally significant biodiversity. This is achieved through a network of national parks, nature reserves, marine reserves, Indigenous protected areas and privately protected areas. [14]

Australia's First Nations people have a continuing history of caring for Country, with archaeological evidence showing land management techniques spanning tens of thousands of years before the arrival of Europeans.

The unique ecosystems, flora and fauna have evolved alongside millennia-long interactions with Indigenous peoples, their cultural practices and on-country activities. European arrival and colonisation resulted in an ongoing set of shocks to these systems that Australia continues to face today.

In more recent colonial history, Australia's first national park – Royal National Park in New South Wales – was declared in 1879, with Victoria following suit with parks like Wilson Prom and Mt Buffalo in 1898.

ENVIRONMENT MINISTERS MEETING – 21 October 2022

Agreed Communiqué

Australia's environment ministers met today in Brisbane and made three landmark commitments to halt and reverse biodiversity loss across our nation and put Australia's environment back on a path of recovery.

The 2021 State of the Environment Report found that Australia's unique animals and plants are under significant pressure. **Action is needed quickly to arrest environmental decline and prevent new extinctions of plants and animals.**

In recognition of the scale and urgency of environmental challenges, ministers agreed:

1. To work collectively to achieve a national target to protect and conserve **30% of Australia's landmass and 30% of Australia's marine areas by 2030**.
2. To note the Commonwealths' intention to establish a **national nature repair market** and agreed to work together to make nature positive investments easier, focusing on a consistent way to measure and track biodiversity.
3. To work with the private sector to **design out waste and pollution, keep materials in use** and foster markets to achieve a **circular economy by 2030**.

Figure 4. Environment Ministers Meeting and commitments to 30 x 30 (DCCEEW, 2022)

While protected area growth since this has been approached in different ways by successive state, territory and federal governments, the last three decades have seen continent-wide efforts to expand the protected area estate. Victoria has a proud history of adding to the protected areas estate, however progress in the last decade has been stagnant. The last major addition to the parks estate was new redgum parks in 2009.[15]

[14] https://report.30by30.org.au/the-report/
[15] https://vnpa.org.au/national-parks-by-premier-op-ed/

Beginning in the mid-1990s, the NRS initiative established collaborative efforts between federal, state and territory governments, First Nations communities, non-government organisations and private landowners. Within a robust scientific framework and bipartisan support, the National Reserve System Strategy established time-bound targets and criteria to protect the full suite of species, habitats and ecosystems across Australia's diverse landscapes.[16]

According to the National Reserve System Strategy, only areas that meet the International Union for Conservation of Nature (IUCN) definition of a 'Protected Area' can form part of the NRS. The IUCN defines a Protected Area as a clearly defined geographical space, recognised, dedicated and managed through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values.

According to the 2024 'Achieving 30 by 30 on land National Roadmap for protecting and conserving 30 per cent of Australia's land by 2030' (*the National Roadmap*):

> *'Protected and conserved areas deliver a broad range of outcomes. They play a central role in protecting species and critical habitats and preventing extinctions. They also help to mitigate the impacts of climate change and build resilient land, inland water, coastal and marine ecosystems. Protected and conserved areas can also contribute to broader outcomes including social, economic, health and cultural outcomes'.*[17]

The National Roadmap is an overarching policy framework that complements Australia's Strategy for the National Reserve System 2009–2030 (NRS Strategy), the National Other Effective area-based Conservation Measures Framework (OECM Framework) and policies in each state and territory.

Figure 5. Roadmap to achieving 30 by 30 on land(DCCEEW, 2024)

[16] https://www.dcceew.gov.au/environment/land/nrs/publications/strategy-national-reserve-system
[17] https://www.dcceew.gov.au/sites/default/files/documents/30-by-30-national-roadmap.pdf

The NRS seeks to protect the full range of regional ecosystems and other important environmental values across Australia. Identification of areas for inclusion in the NRS is underpinned by a scientific framework to ensure that Australia progressively extends protection to examples of all our ecosystems. The objective of the scientific framework is to develop a 'comprehensive, adequate and representative' (CAR) system of protected areas. This scientific framework can equally apply to development of the Conserved Area Network. The CAR principle was also embedded in Regional Forrest Agreements (JANIS criteria) with varying protection target and method of protection including both formal protected areas such as national parks and or informal forest zoning system (see below).

Box 11: The CAR criteria

Comprehensiveness refers to the aim of including samples of the full range of regional ecosystems recognisable at an appropriate scale within and across each Interim Biogeographic Regionalisation for Australia (IBRA) bioregion.

Adequacy refers to how much of each ecosystem should be sampled to provide ecological viability and integrity of populations, species and ecological communities at a bioregional scale. The concept of adequacy incorporates the ecological viability and resilience of ecosystems for individual protected areas and for the protected area system as a whole.

Representativeness is comprehensiveness considered at a finer scale (IBRA subregion) and recognises that the regional variability within ecosystems is sampled within the reserve system (NRMMC 2009, p. 10).

Figure 6. Comprehensive, Adequate and Representative (CAR) Reserve System Criteria (DCCEEW, 2024)

In general, the CAR adequacy criterion is addressed through focusing on protecting and conserving larger areas and more populations of species. Under the National Roadmap Australia's (and Victoria as a signatory) efforts to expand and enhance protected and conserved areas will:

- Prioritise protection and conservation of areas of particular importance.
- Increase protection and conservation in bioregions and subregions with low levels of protection and where ecosystems are not fully represented.
- Improve connectivity between existing protected areas by establishing new protected or conserved areas.

According to the National Roadmap priority should be given to areas that:

- Are high in species diversity.
- Contain species that are highly endemic to an area.
- Provide habitat for nationally listed threatened species and ecological communities, and migratory species.
- Contain, or provide habitat for, species and/or ecological communities under severe and imminent threat, that are irreplaceable, and/or at risk of extinction.
- Are important for the continued provision of ecosystem functions and services.
- Have ecological integrity and intactness.
- Contribute to ecological connectivity.

The GOT terms of reference do not mention or even acknowledge international and national agreements and priorities. They are inconsistent with international and national policy directions, including those which the Victorian Government has agreed to.

These combined principles, outlined in the National Roadmap and the National Reserve System Strategy, include the delivery of a Comprehensive & Adequate Reserve System (CAR). A CAR should as a minimum, guide the assessment and categorisation of public land in Victoria throughout the investigation area of the GOT

At a national level, Indigenous Protected Areas (50 per cent) and public conservation areas, such as national parks (38 per cent) are the two largest types of protected areas followed by jointly managed areas (6 per cent) and private land (6 per cent).

In Victoria there are few Indigenous Protected Areas. This is due to the nature of Victorias native title and land settlement arrangements. There are significant areas of co- or joint managed national parks and reserves. There is currently no clear tenure mechanism for strictly managed Indigenous Protected Areas in Victoria's system for public land though changes have been proposed through the establishment of Cultural Reserves. It's unclear how these Cultural Reserves align with federal/ international definitions of indigenous protected areas.

VNPA supports Aboriginal management of public land for conservation including co-management, joint management and appropriately constituted and legally protected Indigenous Protected Areas.

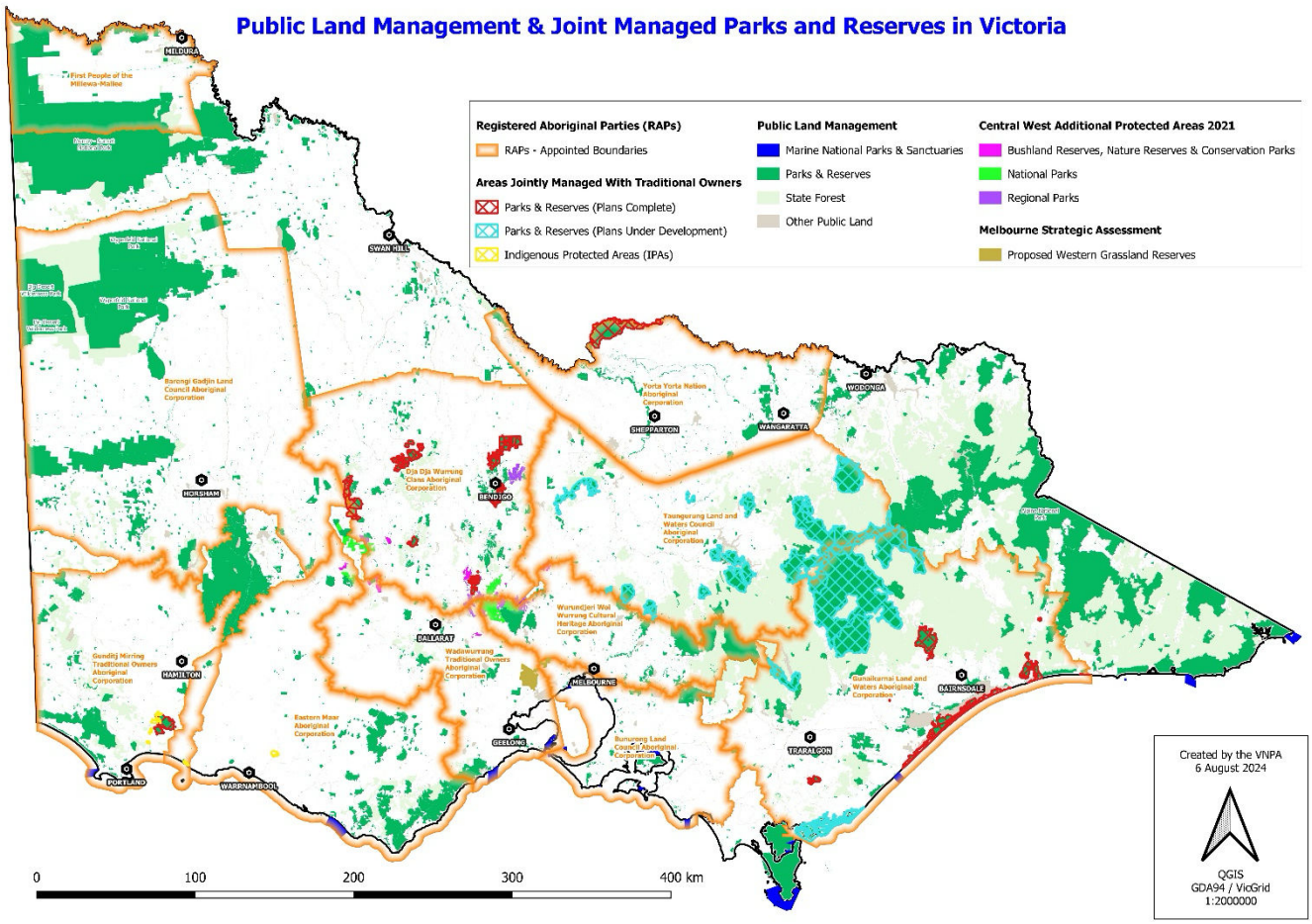

Figure 7. Joint managed Parks and Reserves and Indigenous Protected Areas in Victoria (VNPA, 2024)

Victoria is the most cleared state in Australia with a highly fragmented landscape. Much of the natural areas that remain are of high conservation significance and rich in threatened species, often in comparatively small blocks compared to other less-intensively developed states. This is reflected by the large number of individual reserves in Victoria, being over 4000 but covering only 4 million ha. This is almost twice as many individual reserves as other jurisdictions, although many other places have much larger networks in terms of total hectares. Approximately 18 per cent of Victoria's land is in protected areas. We are not a national leader, sitting at third from the bottom in terms of the percentage of land protected and third in terms of total land protected. New South Wales and Queensland are much larger states in terms of area and have two to three times more land area protected than Victoria.

Table A: Terrestrial protected areas by jurisdiction as at June 2022 (CAPAD 2022)

Jurisdiction	Number of protected areas	Protected area (ha)	% of jurisdiction protected
ACT	51	131,904	55.94
NSW	2,350	8,169,918	10.20
NT	85	33,536,325	24.88
QLD	1,222	15,275,846	8.83
SA	2,014	29,721,867	30.20
TAS	1,676	2,893,895	42.31
VIC	4,627	4,012,888	17.64
WA	1,857	76,142,710	30.13
Total	**13,903**	**169,941,262**	**22.10**

Figure 8. Terrestrial protected areas by jurisdiction as at June 2022 (CAPAD, 2022)

The National Roadmap also introduces a new concept 'other effective area-based conservation measures' (OECMs or, in Australia, conserved areas)'. OECMs are geographically defined areas, other than protected areas, which are governed and managed in ways that achieve positive and sustained long-term outcomes for the in-situ conservation of biodiversity, with associated ecosystem functions and services and, where applicable, cultural, spiritual, socio-economic and other locally relevant values.

Conserved areas deliver effective in-situ conservation of biodiversity, even if management for conservation is not the primary management objective. This is distinct from protected areas, which must have a primary conservation objective. Recognition of conserved areas provides an opportunity to recognise conservation actions occurring in areas that are important for biodiversity but where formal protected area designation is not possible, appropriate or supported. The management of biodiversity values in a way that achieves their long-term maintenance (or improvement) is the fundamental basis for conserved areas.

OECMs should not be the primary focus of the Victorian Government and any arrangements reached should be long-term and legally binding: 'Consistent with Australia's Strategy for the National Reserve System, long-term management arrangements for Conserved Areas should ideally be in-perpetuity, but if this is not possible, then the minimum should be at least 99 years.'

Conserved Areas contribute to the Conserved Areas Network which complements the NRS in terms of the biodiversity outcomes it achieves but does not duplicate or replace the National Reserve System.

In VNPA's view these types of arrangements should be used to recognise existing levels of protection such as regional parks or water catchment areas. Simply claiming state forests or even existing special protection zones as OECM would not in our view fit the criteria set under existing legal and management arrangements.

A detailed review published in the academic journal *Conservation* in 2024 looked at various land use categories and conservation mechanisms to determine the likelihood of these categories/mechanisms meeting the OECM definition, it concludes:

> *'Most RFAs established new dedicated reserves to meet the criteria, although Victoria's five RFAs used mostly new informal reserves (Special Protection Zones (SPZs) in state forests) with no justification provided for doing so. SPZs are not considered protected areas in Victoria. Many SPZs are large and contain important ecological values. SPZs in Victoria (and potentially Informal reserves in state forests in other states) might qualify as an OECMs, provided there is long-term intent to retain the SPZ in that current location. However, past evidence is that some SPZ boundaries have been changed with updates of regional forest management plans, so greater assurance on the longevity of the zone beyond the life of a forest management plan would be required.'*

It concludes:

> *'…Australia already has a comprehensive suite of proven protected area mechanisms that, with increased investment, are likely to deliver the best chance of meeting its 30 × 30 protection target'* [18]

2.1 State policy and community context

More than half of the state's native vegetation has been cleared since European settlement, and many native plant and animal species are at risk from a range of pressures, including the impacts of climate change. Biodiversity in Victoria's forests, as in the rest of the state, has declined since European settlement. [19]

Public land in Victoria covers around 8 million hectares, which is approximately a third of the state. The majority of the public land is comprised of national parks and other conservation parks managed by Parks Victoria (PV; 4 million ha) and state forests managed by DEECA (3.2 million ha) [20]

According to the Victorian Government's State of the Environment Report SOE 2023, main indicators for forest had deteriorated between 2018 and 2023. The report notes:

> '*The Victorian SoE 2018 Report indicated that there were several major issues that the literature identified for long-term sustainable forest management in Victoria. These were climate change, changing fire regimes, deteriorating biodiversity, forest fragmentation, economy and the legal framework. Many of these issues have been worsened, making Victorian forests more vulnerable to achieve sustainable forest management. Climate change has been the main driver behind Australia having more regular and larger*

[18] Fitzsimons, J.A.; Partridge,T.; Keen, R. Area-Based Conservation Measures (OECMs) in Australia: Key Considerations for Assessment and Implementation. Conservation 2024, 4,176–200. https://www.mdpi.com/2673-7159/4/2/13.
[19] https://www.delwp.vic.gov.au/__data/assets/pdf_file/0034/417895/4-Biodiversity-factsheet-FINAL.pdf
[20] State of the Environment 2023 Report | CES https://www.ces.vic.gov.au/soe2023 page 404

bushfires and blazes which cause greater forest destruction. This is likely to continue with considerable implications for sustainable forest management.'[21]

While this assessment was framed in context of continued native forest logging, many issues remain including forest fragmentation, climate change and fire and a now unsuitable legal framework. Visitation which is largely unmanaged in state forests is likely to be one of the continued drivers of on-going biodiversity deterioration, post logging.

2.2 Victorian policy: Protecting Victoria's Environment – Biodiversity 2037 [22]

Released by the Victorian ALP Government in 2017, Protecting Victoria's Environment – Biodiversity 2037, was flagged as key biodiversity protection policy for the state of Victoria. The Minister forward describes it as follows:

'The Victorian Government has an ambitious environmental agenda and is prioritising the care and protection of our natural environment, which in turn will lead to greater economic stability and healthier communities. We committed to developing a statewide Biodiversity Plan. This Plan, Protecting Victoria's Environment – Biodiversity 2037, marks a turning point for Victoria.'

The plan commits to *'Maintaining and improving a world- class reserve system'.*

Key directions outlined in the plan include:

- Permanently protected habitats on public and private land and waters – in national parks, conservation reserves and Indigenous protected areas, and under covenants – form the backbone of biodiversity conservation. To maintain and improve biodiversity, the extent and condition of these permanently protected areas need to be enhanced Page 48)
- The estimated gap in additional protected areas required to meet Australia's criteria for a comprehensive, adequate and representative reserve system is 2.1 million hectares. (page 49)
- To ensure that Victoria's reserve system on public and private land is as effective as possible, formally protected areas need to be well managed and well connected. Improving habitat condition, habitat linkages and reducing threats are all vital actions needed to improve and restore biodiversity values and ecosystem health across protected areas, as across the wider landscape. (page 49)
- In implementing this Plan, the government will give due recognition to the increased importance of the Victorian Environmental Assessment Council in regularly reviewing the extent and adequacy of the terrestrial reserve system in the context of a changing climate, habitat shifts and decisions about appropriate land uses (page 49)

[21] State of the Environment 2023 Report | CES https://www.ces.vic.gov.au/soe2023 page 405
[22] https://www.environment.vic.gov.au/biodiversity/biodiversity-plan

- **Priority 18:** To ensure that Victoria's reserve system on public and private land is as effective as possible, formally protected areas need to be well managed and well connected. Improving habitat condition, habitat linkages and reducing threats are all vital actions needed to improve and restore biodiversity values and ecosystem health across protected areas, as across the wider landscape (page 49).

Neither the original nor the revised GOT terms of reference make no reference to the implementation of the state's biodiversity plan.

2.3 Victorians' visitation, use and community attitudes

According to the Great Outdoor Taskforce, currently state forests have about 16 million annual visits. National & state parks have around 54 million in 2022-2023 and this more than doubles if regional, metropolitan parks or other PV managed land are included. The number of national and state park visits increased by 8 per cent on 2020-2021, numbers which was reportedly due to an increase in both Victorian and interstate visitors.[23]

More than three times as many people visit national parks and state parks than visit state forests currently, which dispels the myth that they are somehow locked up, when in fact the reverse could be argued. Recent statewide polling shows an overwhelming (80 per cent +) majority of Victorians support the creation of new national parks.[24]

Over half of all Victorians said that the presence of a national park would make them more likely to visit regional Victoria. People favoured either interesting natural features, such as waterfalls (58 per cent), seeing wildlife (48 per cent) as well basic facilities such as toilets (53 per cent). Peace and quiet (53 per cent) ranked highly and interestingly 38 per cent visited parks as they recognised as areas free of hunting/no shooting allowed.

[23] https://www.parks.vic.gov.au/-/media/project/pv/main/parks/documents/about-us/annual-reports/national-parks-act-annual-report-2022-23.pdf?rev=09782403767948f5b74d29f2ead916b6

[24] https://vnpa.org.au/media-release-time-for-allan-government-deliver-popular-protections/

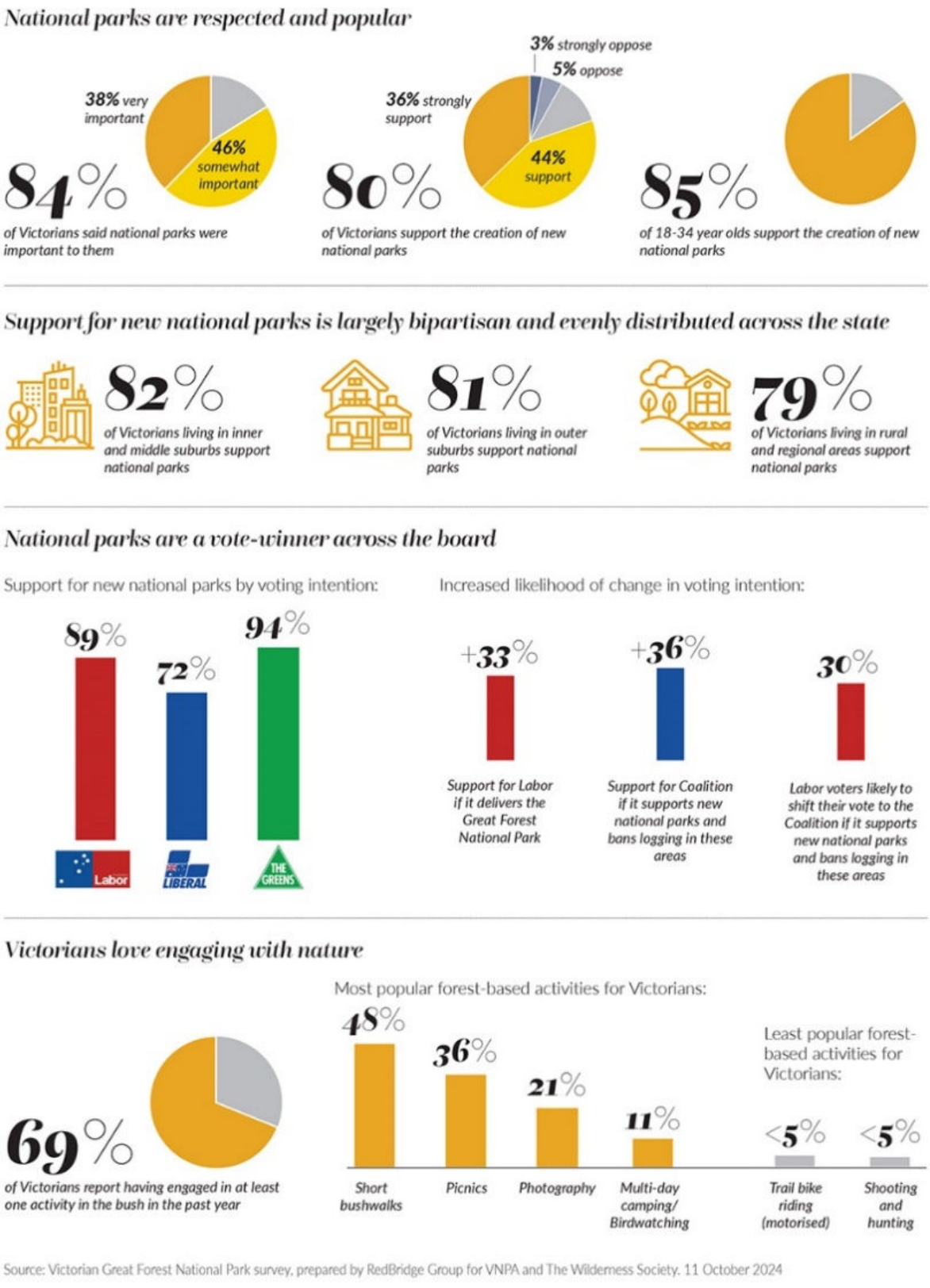

Figure 9. Statewide polling showing overwhelming Victorian support for new national parks (VNPA & the Wilderness Society, 2024)

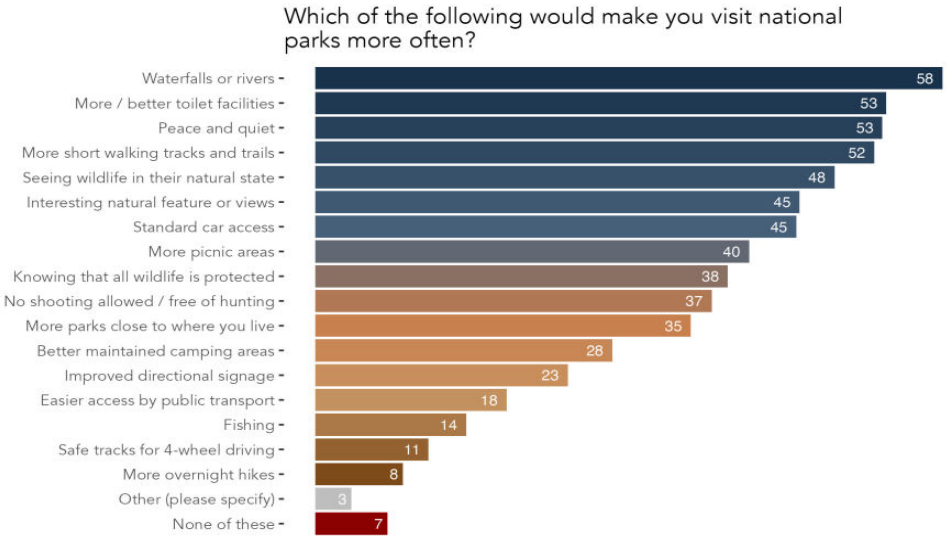

Figure 10. Statewide polling showing what attracts Victorians to national parks (VNPA & the Wilderness Society, 2024)

In terms of Victoria's forests as a whole (whether in a park or outside), the most popular activities for the bulk of Victorians seem to be passive enjoyment.

- The most popular forest-based activities for Victorians include: short bushwalks, (48 per cent), picnics (36 per cent), photography (21 per cent), multi-day camping (11 per cent), bird watching (11 per cent).
- The least popular forest-based activities for Victorians (under 5 per cent) include: trail-bike riding (motorised), shooting and hunting.

There seems to be a bias in the Great Outdoor Taskforce revised terms of reference to focus on the existing uses of state forest e.g. 'We want people to continue to undertake the activities they love…' while a large proportion of people actual want to enjoy these areas in a way more consistent with park management priorities and uses, compared to the free for all which currently exists in state forests.

The Taskforce also purports to want 'Improved management ***will help more people access our forests and experience nature***, whilst ensuring our forests are resilient in the face of climate change, population growth, and increasing emergency events.' [25] *(emphasis added)*

[25] https://www.deeca.vic.gov.au/futureforests/future-forests/great-outdoors-taskforce

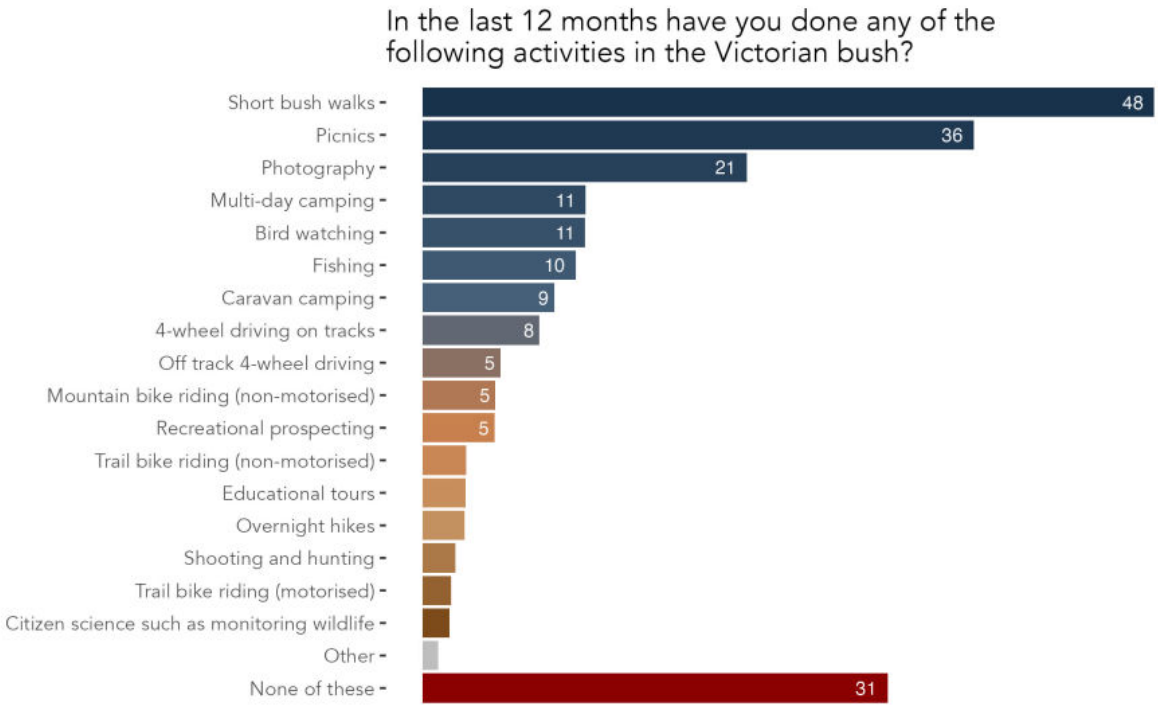

Figure 11. Statewide polling showing what activities Victorians do in the Victorian bush (VNPA & the Wilderness Society, 2024)

If the intent is to allow people access and experience with nature, state forest and so-called traditional uses are at odds with the clear preferences of the wider community based on community sentiment and existing use levels. National parks are a well-recognised brand in the community, while state forests are popular with selected users. They do not attract the broader community, in fact some of more active and disruptive pursuits such as shooting appear to put a significant proportion of the population off visiting state forests.

There is of course space for all types of uses and nature conservation however the decision – that **'the Taskforce will not be making any recommendation for large-scale changes to land tenure, including not creating any new national parks'** is based on flawed logic.

Without permanent protections such as those under the *National Parks Act* or other protected area tenures, forests will remain vulnerable to the return of logging. While some instruments which facilitated logging have been removed, if policy priorities change logging can be returned largely at the stroke of pen using provisions of the *Forest Act* e.g. forest produce licenses.

If the Government refuses to consider tenure change, the other key policy enablers which allow the return of native forest logging should be removed, including:

- Reform of the *Forest Act*, including the removed capacity for forest produce licenses to be issued for commercial forestry.

- Dismantling of Victoria's five Regional Forest Agreements (RFAs), which the Government committed to end by December 2024.
- Dismantling the *Forests (Wood Pulp Agreement) Act 1996*.
- Change the purposes, governance and possible name of state forests to exclude large scale commercial extraction.
- Proper implementation of state and federal threatened species laws.
- Provide a planning, zoning and prescription based regulatory framework to ensure key ecological attributes are properly protected from their ranges of threats.

Some of these issues are explored below as reform options.

Key Points – Section 2 – International, National & State Policy Context

- The GOT terms of reference do not mention or even acknowledge international and national agreements and priorities and are inconsistent with international and national policy directions, including those which Victorian Government have agreed to.
- Combined principles outlined in the National 30x30 Roadmap and the National Reserve System Strategy include the delivery of Comprehensive & Adequate Reserve System (CAR) reserve system, which should as a minimum guide the assessment and categorization of public land in Victoria throughout the investigation area of the GOT.
- The VNPA support indigenous management of public land for conservation including co management, joint management and appropriately constituted and legally protected indigenous protected areas.
- Conservation Areas (OECMS) under the national roadmap should be used to recognize existing levels of protection such as RASMAR sites or water catchment areas. Simply claiming state forests as OECM would not in our view fit the criteria, under existing legal and management arrangements.
- Neither the original or revised GOT terms of reference make no reference to the implementation of the State's biodiversity plan, Biodiversity 2037.
- More than three times as many people visit national parks and state parks than visit state forests currently, which dispels the myth that they are somehow locked up
- Statewide polling shows an overwhelming (80% +) majority of Victorians support the creation of new national parks.
- Without permanent protections such as those under the National Parks Act or other protected area tenures, forests will remain vulnerable to the return of logging.
- If the government refuses to consider tenure change, the other key policy enablers which allow the return of native forest logging should be removed

3. State forest reform issues

3.1 Purposes of state forests

State forests are an outdated idea that have limited usefulness in managing visitor pressure, facilitating safe and equitable access to public land as well as mitigating wildlife extinction and protecting habitat.

This document should not be taken as a supporting document for the land tenure of state forests. In a post-native forest logging Victoria, there is no need for the state forest tenure. The need for securely legislated, conservation-based land tenures is the only way to protect forest ecosystems into the future, for Victoria to meaningfully protect areas of high ecological importance, and meet its commitments to protecting 30 per cent of Victoria by 2030.

Leaving state forests as they are leaves the back door open to future extractive industries such as native forest logging, silvicultural based management and mining that have already caused mass harm to the forests of Victoria's east.
It is estimated that the state of Victoria has invested roughly a billion dollars in the transition of native forest logging into a plantation-based industry. Leaving the state forest land tenure available for future government and policy changes will not only waste this investment but also lead to continued loss of habitat, damage to water catchments and loss of carbon sequestration.

Ideally, state forests should be abolished and replaced with a land tenure that excludes extractive industries such as native forest logging and mining. Clear reforms to the legal status, oversight and governance of state forests are needed if they were to be retained.

Native forests' values are extensive when managed for their ecological functions, these include;

- storage of carbon
- water creation and cleaning
- protection of biodiversity
- First Nations cultural connections
- soil production and protection
- sustainable recreational activities
- positive physical and mental health outcomes
- preservation of native plants and animals.

All these values are degraded and lost when native forests are logged, mined or cleared. These values are also damaged by fragmentation and ecologically inappropriate fire regimes. The current purposes of state forests – essentially established the forests as a target for extraction, such as native forest logging – needs to change to reflect changing use. State forest are currently defined as:

'Extensive areas of land supporting native forest and other native vegetation with a range of diverse conservation and recreational values, and containing a range of resources to supply community demands'

. State forest or forest includes reserved forests and protected forests (*Forests Act*, section 3).

The current purpose of state forests (proposed in the new public land act)

- Provide for a range of forest uses including recreation and education.
- Provide for a range of forest products.
- Protect the natural environment including biodiversity.
- Supply water and protect catchments and streams.
- Protect and maintain natural, cultural, or historic features and scenic landscapes.[26]

The option to see state forest simply as a recreation and wood supply tenure is no longer useful. Suggested change the purposes of state forests to reflect their value are as follows:

- Protect the natural environment including biodiversity.
- Support the promotion of indigenous cultural heritage and self determination.
- Maintain ecological integrity and ecosystem processes.
- Supply water and protect catchments and streams.
- Protect and maintain natural, cultural, or historic features and scenic landscapes.
- Provide for a range of forest uses including recreation and education consistent with the above.

State forests should be abolished/ amended and replaced with a land tenure that excludes extractive industries such as commercial logging and mining and puts in place a management regime to deal with on-going fragmentation and manage visitor pressure.

The reform process must also center First Nations communities by embedding Traditional Owner (TO) knowledge and management practices into forest governance. Co-management agreements and funding for Indigenous-led ecological surveys should be legislated as core components of this shift.

3.1.1 New governance of the management of state forests

State forests are managed under the *Forest Act 1958* with the head of power being the Secretary of DEECA. This has since been delegated to the Chief Fire Officer[27] (CFO) with staff employed through DEECA brand Forest Fire Management Victoria (FFMV).

[26] https://cog-live.s3-ap-southeast-2.amazonaws.com/n/1446/2021/Apr/10/0329/Victorian per cent20Crown per cent20Land per cent20Consultation per cent20Paper.pdf#:~:text=Public per cent20land per cent20allows per cent20us per cent20to per cent20spend per cent20time per cent20in,activities per cent20that per cent20contribute per cent20to per cent20Victoria per centE2 per cent80 per cent99s per cent20economy per cent2C per cent20including per cent20tourism.

[27] *2024 fire summit – chris hardman* (2024) *Forestry Australia*. Available at: https://www.forestry.org.au/2024-fire-summit-chris-hardman/ (Accessed: 29 November 2024).

The Chief Fire Officer has expectations from the government on undertaking work on public land to manage bushfire risk. These obligations have in recent years clashed with conservation and welfare of state and Commonwealth listed endangered wildlife and ecosystems.

In recent years, FFMV operations have favoured the loss of biodiversity values and led to questionable decision-making processes. These decisions and disinterest of the CFO in legislative obligations to protect wildlife and biodiversity has led to the death of Greater Glider[28] (endangered Victoria and Commonwealth) in trees assessed to be low risk, felling of trees with a diameter of greater than 2.5m (state policy is to protect trees of 2.5m DBH on public land) that were assessed to have low risk and broad scale removal of large and hollow trees across the state[29].

The impact of fire management works on biodiversity values such as significant trees was highlighted by the Victorian Auditor-General's Office (VAGO) in its 2020 report to Parliament, Reducing Bushfire Risks. The VAGO report found that 'With the exception of some isolated case studies, DELWP [now DEECA] does not know the effect of its burns on native flora and fauna.'[30]

This highlights the lack of independent oversight of fire management operations, awareness of ecological management and legal requirements and care within FFMV.

FFMV is also failing in many of its ecological and land management obligations to manage pest plants and animals listed under state and Commonwealth laws.

There is a clear conflict of interest with the Chief Fire Officer being the sole manager of state forests and their obligations to manage bushfire risk on public land and need to protect biodiversity values and animal welfare.

Currently, there is no clear accountability for management of state forests for all of its values. While the Secretary of Department (currently DECCA) is ultimately responsible, there is no clear position or unit in the department responsible for managing all the values of state forest. These duties largely fall to the Chief Fire Officer and relevant Deputy Secretaries, or discrete siloed units such as biodiversity and or regulation via Office of the Conservation Regulator, the focus appear to largely fire or hazard reduction related, rather than all values and uses in a comprehensive manager.

Recognising that management of public land will increasing become managed by Traditional Owners, this will take time to evolve and there will likely always be some area and issues which the Victorian Government will need to resolve and maintain responsibility for. A Director of State Forest or similar with clear responsibilities, accountability and public face for community to deal with the many

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[28] Hall, B. (2024) *Endangered greater glider found dead next to Department's felling site*, *The Sydney Morning Herald*. Available at: https://www.smh.com.au/environment/conservation/endangered-greater-glider-found-dead-next-to-department-logging-site-20240515-p5jdum.html (Accessed: 29 November 2024).

[29] Rare discovery in Aussie Forest Sparks call for protection of ancient trees marked for removal (no date) Yahoo! News. Available at: https://au.news.yahoo.com/rare-discovery-in-aussie-forest-sparks-call-for-protection-of-ancient-trees-marked-for-removal-022547216.html (Accessed: 29 November 2024).

[30] Victorian Auditor-General's Office (2020) Reducing Bushfire Risks October 2020, p. 69

management issues, should be considered. These would both inform and work hand in hand with a zoning system.

Reforms should be supported by public education campaigns emphasising the ecological, cultural, and economic value of forests. This can increase public support and foster grassroots advocacy and community support.

3.1.2 Forest Management Plans

State forests are managed under the *Forest Act 1958* through the 'Working Plan' provision of the Act that is implemented through Forest Management Plans (FMP).The definition of the 'working plan' in the Act is *'a detailed scheme for the control and regulation of the working of a forest or any part thereof and for ensuring the* ***maintenance of a sustained yield of forest produce there from.'***

Forest management plans (FMPs) were developed in the 1990s and early 2000s and divides Victoria's forests into zones and establish objectives for conservation, land management and uses that include timber harvesting. A modernisation of Victoria's RFAs include a commitment to review FMPs by December 2023 and at least every 10 years thereafter, for so long as the agreements remain in effect (Clause 65(b) in Central Highland RFA). There are eight plans covering forest management areas in the state that include East Gippsland, the Central Highlands, the north-east and Midlands.

The plans identify the location of three forest management zones:

- General management zone (GMZ): managed for a range of uses, with timber production having a high priority.
- Special management zone (SMZ): managed to conserve specific features and where timber production is catered for under certain conditions.
- Special protection zone (SPZ): managed for conservation and where timber harvesting is excluded. Planned burning and grazing may be allowed if compatible with maintaining the area's values.

The formal Forest Management Plan for East Gippsland FMA has not been updated since 1997 and was largely timber production focused although it did inform a series of zonings and prescriptions.[31] The North East Forest Management Plan has not been updated since 2001, Gippsland since 2004. They are decades out of date. If state forests are to be retained they need a management plan, which is not timber harvest focused, has up to date biodiversity information, and includes plans to manage all aspect of state forest values and uses, including recreation uses, fragmentation, roading, bee keeping sites, fire refuges, invasive species and so on as well informing a zoning system.

[31] https://www.forestsandreserves.vic.gov.au/__data/assets/pdf_file/0019/530173/Forest-Management-Plan-for-the-East-Gippsland-Forest-Management-Area-1995_.pdf

3.2 Forest zoning systems, RFAs and delivering 30x30x30

The Nationally Agreed Criteria for the Establishment of a Comprehensive, Adequate and Representative Reserve System for Forests in Australia by the Joint ANZECC / MCFFA National Forest Policy Statement Implementation Sub-committee (the JANIS criteria) was a key driver of land use allocation outcomes in Regional Forest Agreements across the country. Besides setting percent targets for ecosystem protection, it was also explicit about the type of protection required: *'All reasonable effort should be made to provide for biodiversity and old-growth forest conservation and wilderness in the Dedicated Reserve system on public land. However, where it is demonstrated that it is not possible or practicable to meet the criteria in the Dedicated Reserve system, other approaches will be required. For example, conservation zones in approved forest management plans …*'

The JANIS criteria set out targets for the conservation of ecosystems:

- 15 per cent of the pre-1750 distribution of each forest type
- 60 per cent of the existing distribution of each forest type if vulnerable
- 60 per cent of the existing old-growth forest
- 90 per cent, or more, of high quality wilderness forests, and

All remaining occurrences (100 per cent) of rare and endangered forest ecosystems including rare old-growth.

JANIS criteria were developed in 1997 when the global target for reservation was 10 per cent. Under the Kunming-Montreal Global Biodiversity Framework, the global target is 30 per cent reservation. Australia has committed to this target at the national level and the Victorian Government has formally supported this.

The Regional Forest Agreements (RFAs) tended to make big claims that native forest logging is ok because it also protects the environment through the establishment of parks and reserves. But this is largely a myth.

For example, the 2019 independent consultation paper Modernisation of the Victorian Regional Forest Agreements paints a rosy picture of the success of RFAs in Victoria, but key elements of it are unfounded and misleading. See more here .

The report notes that all the changes to land tenure identified through this process were implemented in Victoria's RFA regions between 1999 and 2004. The report also notes that Victoria has 3.68 million hectares of parks and conservation reserves.

However, of the 3.68 million hectares of parks and conservation reserves cited, 84 per cent or roughly 3,077,000 hectares of land was protected under the *National Parks Act 1975* in Victoria before 1999 – before the RFAs started. This does not include the significant areas protected in other public land tenures such the *Crown Land (Reserves) Act 1978.*

The RFA process has had little to do with the establishment of new national parks and reserves in Victoria, and has been a block rather than a driver to the creation of protected areas. While this may be

now obsolete as Victoria has agreed to end the RFAs in Victoria in December 2024 with the end of native forest logging, it does have a legacy which is relevant to Australia meeting its 30x30x30 targets supported by the Australian and Victorian governments.

The Independent Consultation Paper states that 'By 2003, 900,000 hectares of forest had been added to the existing reserve system in Victoria through the RFA process' is quite misleading. The bulk of this 900,000 hectares is in the informal reserve system, and not formally or permanently protected. According to the 2018 Victorian State of the Forests report, 828,000 hectares of special protection zones (actually informal and impermanent reserves) were established in Victoria in 2004 (see below).

Around 92 per cent of so-called reserves created under all the Victorian RFAs are informal (special protection zones etc.). Only 8 per cent of reserves related to RFAs are protected in formal reserves. This zoning system no longer has any legal effect, as it only relates to potential impacts for commercial logging which has now been phased out in Victoria. Other damaging impacts are not covered in the zoning systems for forests. For example, through the use of fire management provisions under the *Forests Act*, DEECA knowingly removed denning and nesting trees of the endangered Greater Glider in May 2024 within informal Special Protection Zones which had just been established through the RFAs in 2022. These SPZs were established specifically for the conservation of the endangered Greater Glider, but so-called hazardous tree removals within this new SPZ was found to be killing endangered Gliders, not protecting them.

Victorian under no circumstances should be allowed to claim this zoning system as either part of the Protected Areas estate or as conservation areas, unless there is a substantial strengthening of the legal force of the zoning system to cover other damaging activities or such zoned areas are added to the protected area estate.

Without new legislated protected areas, there is a risk in Victoria that our reporting against the Comprehensive, Adequate and Representative (CAR) reserves system as articulated under National Forest Policy and RFAs, will in fact go backwards by almost 800,000 ha.

Table Fo15: Area available for harvest within native forests of Victoria between 2006 and 2022.[1433]

Tenure	Forest management one	Year and area ('000 ha)							
		2006	2008	2012	2014	2016	2018	2020	2022
Available									
State forest	General Management Zone	2,403	2,318	2,110	2026	2,112	2,180	2,006[a]	2,029[a]
	Special Management Zone	182	172	275	263	159	153	152[a]	200*
Parks and conservation reserves	Limited timber production	12	12	18	14	19	19	0[b]	0[b]
Total available		2,597	2,502	2,403	2,302	2,290	2,352	2,258	2,229
Not Available									
State forest	Special Protection Zone	828	783	753	747	756	768	773	777
	Immediate Protection Area	-	-	-	-	-	0	96[a]	96[a]
Parks and conservation reserves	Limited timber production	-	-	-	-	-	0	19[b]	19[b]
	No timber production	3,820	3,825	3,982	4,117	4,106	4,139	4,130	4,139
Total not available		4,645	4,608	4,735	4,864	4,862	4,907	5,028	5,031
Grand total		7,242	7,110	7,138	7,166	7,153	7,259	7,286	7,260

[a] *In 2019, the Victorian Government developed the VFP. The plan identified IPAs across eastern Victoria which included areas where commercial timber harvesting was previously permitted. The area of GMZ in the IPAs (~89,000 ha), and the area of SMZ in the IPAs (~7,000 ha), has not been included in the area available for harvest.*

[b] *The areas of limited timber production are forest areas where previous land-use determinations (e.g. by the Land Conservation Council) outlined that limited timber production is permitted in these areas, usually with conditions and with the permission of the land manager. While the land-use determinations are still in place these areas were not included in the Allocation Order 2013 (amended in 2014 and 2019). These areas have not been included in the tally of area available for timber production. These areas include: Ada River sawmills historic reserve, Colquhoun regional park, Comet Sawmill historic reserve, Grant historic area, Kirchubels tramway and mill historic reserve, Kurth Kiln regional park, Mississippi no. 1 mill historic reserve, Mount Murphy historic area, Mount murphy historic area, Mount Wills historic area, Rubicon Valley historic reserve, and Walhalla historic area.*

1431. Major Event Review Independent Panel 2022, 'Victorian regional forest agreements: Major event review of the 2019-20 bushfires', https://www.agriculture.gov.au/sites/default/files/documents/vic-rfa-mer-bushfires-report-2022.pdf, Accessed 21 November 2022.
1432. D+ sawlog is inclusive of B grade, C grade and D grade sawlog.
1433. Department of Jobs, Precincts and Regions (DJPR), 'Unpublished data', Melbourne, Victoria, Accessed 2022.

Figure 12. Areas of state forest covered by existing Informal Reserves (Commissioner for Environmental Sustainability, 2023) [32]

It is unlikely that the informal reserve system, in its current state, would meet even the basic benchmarks for the complementary Other Effective area-based Conservation Measures areas (OECMs) as agreed to by Victoria and all other States and Territories in June 2024[33]

The *Review of the Victorian CAR Reserve System: Synthesis Report, Final Report*, undertaken by DELWP (Now DEECA) in 2022 in context of RFA's highlighted some areas for improvement in current JANIS based CAR Reserve System performance.[34] The DELWP report recommended on public and private land the following on Public Land:

For some EVCs, there are options to improve performance against the JANIS criteria by incorporating public land into the CAR Reserve.

This includes:

> *a) Formally incorporating areas that are currently protected through policy (Immediate Protection Areas (IPAs), areas protected via VEAC recommendations) into the CAR Reserve System to enable more permanent protection.*

[32] Table Fo15: Areas available for logging 2006-2022, State of the Environment report 2023 https://www.ces.vic.gov.au/soe2023

[33] National other effective area-based conservation measures (oecms) framework, DCCEEW. Available at: https://www.dcceew.gov.au/environment/land/achieving-30-by-30/conserved-areas/national-oecms-framework (Accessed: 02 December 2024).

[34] https://www.forestsandreserves.vic.gov.au/forest-management/comprehensive,-adequate-and-representative-car-reserve-system-review

b) Incorporating currently unprotected State Forest land (General Management Zone (GMZ), Special Management Zone (SMZ)) into the CAR Reserve.

The current DEECA website 08/05/23 notes *that 'The Victorian Government is considering how the report's findings can improve the CAR reserve system, including how this work can provide an input to the Australian Government's commitment to protect 30 percent of land by 2030.*[35]*'*

This seems in direct contrast to the GOT statements that they will not consider large new national parks.

To summarise, Victoria under no circumstances should be allowed to claim this zoning system as either part of the protected are estate or as conservation areas (through 30 x 30 commitments) because:,

- the zoning system no longer has any legal effect, as it in it current form only relates to potential impacts for commercial logging which has now been phased out in Victoria.
- other damaging impacts are not covered in the zoning systems for forests
- Its not permanent and can be changed relatively easily.
- substantial strengthening of the legal force of the zoning system would be required to make it qualify under 30x30 to cover other damaging activities and improving it legal force and permanency.

Without new formal protected areas or substantial reform there is a risk in Victoria that our reporting against CAR reserves system as articulated under national forest policy and RFAs, will in fact go backwards by 800,000 ha, before 30x30 even gets really started.

If large new protected areas are not being considered (national parks already have an extensive zoning system implemented through park management plans) ultimately recreational activities and other uses must be balanced with ecological protection through evidence-based zoning. New guidelines should establish areas where recreation is compatible with biodiversity conservation, supported by improved infrastructure and public education programs. In addition, the zoning system should be:

- Used to inform strategic additions to existing national parks & reserves. Many SPZs already articulate clear links between existing reserves or buffers (see examples below)
- Strengthen – new zoning systems should be put in place for state forests that implement genuine protection for biodiversity, which is legal binding, permanent and exclude or manage a deeper/ broader range of activities, uses and threats to wildlife and habitats.

While SPZ were largely based on original surveys done as part of comprehensive biodiversity assessments for RFAs in the 1990s, many were modified based on new survey data or reactions to logging plans. While far from perfect, as noted in VEAC 2017 Assessment of the Values of State Forests analysis of forest dependent species *'…special protection zones do not have higher representation of high contribution areas than other state forest zones (GMZ and SMZ), even though*

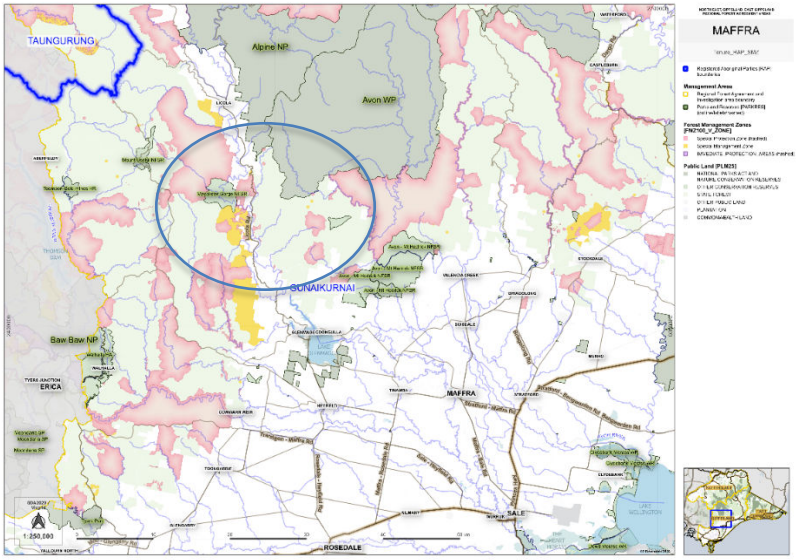
[35] Comprehensive, Adequate and Representative (CAR) reserve system review, DEECA 2024. https://www.forestsandreserves.vic.gov.au/forest-management/comprehensive,-adequate-and-representative-car-reserve-system-review

some SPZs are specifically established for particular threatened species'[36] they do provide an important starting point and fulfill previous commitments which should not be lost.

Victoria must legislate protections for informal reserves and ensure any zoning reforms under the CAR Reserve System meet international standards for permanence and enforceability. This will prevent regression in conservation outcomes and align with the 30x30 targets criteria for permanency.

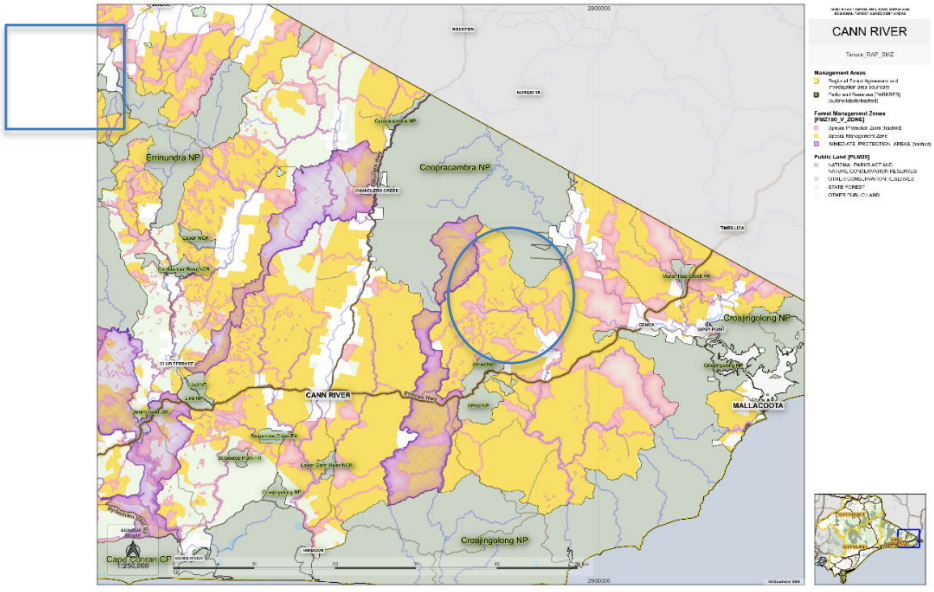
[36] https://veac.vic.gov.au/investigations-assessments/previous-assessments/investigation/conservation-values-of-state-forests-assessment-report. Page 19

Examples of key linkages and buffer already identified by SPZs in East Gippsland.



SPZ Park Linkage example

Figure 13. Example of informal Special Protection Zones forming key Park linkages (VNPA, 2025)



SPZ Park Buffer example

Figure 14. Example of informal Special Protection Zones forming key Park buffers (VNPA, 2025)

3.2.1 Clear and enforceable prescriptions needed to protect threatened wildlife and habitats

in 2017, there were 84 forest dependent species of Victorian flora and fauna identified on threatened species lists, either state-wide or federally, acknowledging the risks of extinctions for those species [37]. The unprecedented intensity and scale of the 2019-20 bushfires has only made matters worse, with 63 forest-dependent species added to Victoria's threatened species list in 2021, almost doubling what was already a long list [38].

Historically under Victoria's Code of Practice for Timber Production 2014 (as amended 2022) [39], at-risk threatened wildlife and habitats have been assigned prescriptions to mitigate the impacts of timber harvesting. But with timber harvesting now out of the picture, the long list of other threats needs to be addressed on a case by case basis for threatened wildlife & habitats and or a comprehensive set of prescriptions established.

In addition to protection for species afforded be the zoning system, the Code of Timber Production put in place prescriptions for 20 mammal, 14 birds, 6 reptiles, 6 amphibians, 14 fish, 10 crustaceans, 2 terrestrial invertebrate species and 315 plant species in an attempt to mitigate timber harvesting impacts under the code.[40] The code along with zoning no longer has any real legal effect, for activities other than logging.

If state forests are to persist, there needs to be protections in place for threatened wildlife & habitats to the various threats they face in these areas, particularly those that are human induced. This includes but not limited to issues such as domestic firewood collection, mineral extraction, fuel reduction burning and inappropriate fire regimes, so called-hazardous tree removals, clearing for construction & maintenance of strategic fuel breaks & roads, tourism and infrastructure developments, impacts from illegal or off track driving, illegal hunting, impacts of prospecting, stocking of trout, inappropriate horse riding, dog walking, spread of pest plants and animals, other recreational activity impacts.

The existing forest zoning system, is a good starting point but far from exhaustive. Government should undertake a scientifically robust process to determine and assess the threats to forest-dependent wildlife & habitats throughout state forest. This should involve expertise from independent scientific experts in their relevant fields. The result of this process should be a list of species/habitat-specific prescriptions to protect values from key threats. State Forest Use Code of Practice should be developed with prescriptions and protections which are clear, enforceable and regulated by an independent regulator.

Ideally this process should first involve identification of areas of key importance where certain threats should be entirely excluded (e.g. no-go zones for domestic firewood collection, fuel reduction burning or

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[37] VEAC Conservation Values of State Forests Report (2017), pp56-58. <VEAC Conservation Values of State Forests Report>

[38] Threatened Species & Communities Risk Assessment: Tranche 2 Risk Assessments Report; Platypus Risk Assessment Report; Little Eagle Risk Assessment Report (2022). <Threatened Species and Communities Risk Assessment (environment.vic.gov.au)>

[39] Schedule 1: Management Standards and Procedures for timber harvesting operations in Victoria's State forests

[40] State of the Environment 2023 Report | CES https://www.ces.vic.gov.au/soe2023 page 405

recreational prospecting). It should then also provide for detection-based zonings (e.g. buffers around records of threatened species) where certain threats will be excluded if a key value is identified.

A framework and adequate funding would be required to allow for a reporting system which incorporates third party information and data from citizen scientists, similarly to how 'Forest Reports' operated for the Department in the context of the timber harvesting industry. Government should also fund its own surveying program to detect and protect key values from threats throughout state forests, as it did in relation to the timber harvesting industry (through the Forest Protection Survey Program or similar). .

We note that the prescriptions developed under the Code of Practice for Timber Production were conservative in nature (e.g. smaller buffers than what was scientifically recommended). The prescriptions and protections developed through this process for State Forest Use Code should be based around the best scientific information on relevant ecology and impacts of threats (e.g. not a process that aims to strike a balance between maintaining an extractive industry and conservation.)

There should also be a framework for incorporating new science or changes in circumstances, giving capacity for the government to increase/add protections if necessary. In the context of the logging industry, this was done under the RFAs through a process known as the Threatened Species & Communities Risk Assessments (TSCRAs). A similar process could be used to inform new or modified zoning systems in face of large scale or intense fire or other natural disasters, increased visitor pressure, invasive species infestations.

Key Points: Section 3 – State Forest Reform

- Leaving the State Forest land tenure available in current state for a future government with different policy prospective will not only waste the significant investment in forest industry transition but also lead to continued loss of habitat, damage to water catchments and loss of carbon sequestration
- Ideally State Forests should be abolished and replaced with a land tenure that excludes extractive industries such as native forest logging and mining. Clear reforms to the legal status, oversight and governance of state Forests are needed if they were to be retained
- The reform process must also center First Nations communities by embedding Traditional Owner (TO) knowledge and management practices into forest governance. Co-management agreements and funding for Indigenous-led ecological surveys should be legislated as core components of this shift
- Currently there is no clear accountability for management of state forests for all of its values, the current focus appear to largely fire or hazard reduction related, rather than all values and uses in a comprehensive manager.
- A Director of State Forest or similar with clear responsibilities, accountability and public face for community to deal with the many management issues, should be considered. These would both inform and work hand in hand with a zoning system.
- If state forests are to be retained they need a management plan, which is not timber harvest focused, has up to date biodiversity information, and includes plans to manage all aspect of state forest values and uses, including recreation uses, fragmentation, roading, bee keeping sites, fire refuges, invasive species and so on as well informing a zoning system
- It is unlikely that the informal reserve system (or forest zoning system), in its current state, would meet even the basic benchmarks for the complementary Other Effective area-based Conservation Measures areas (OECMs) as agreed to by Victoria and all other States and Territories in June 2024
- Unless there is a substantial strengthening of the legal force of the zoning system to cover other damaging activities, improve permanency or the government creates new legislated formal protected areas, there is a risk in Victoria that our reporting against the Comprehensive, Adequate and Representative (CAR) reserves system as articulated under National Forest Policy and RFAs, will in fact go backwards.
- Recreational activities and other uses must be balanced with ecological protection through an updated and expanded evidence-based zoning system outside of protected areas.
- Government should undertake a scientifically robust process to determine and assess the threats to forest-dependent wildlife & habitats throughout state forest
- In addition to a zoning systems and State Forest Use Code of Practice should be developed with prescriptions and protections which are clear, enforceable and regulated by an independent regulator allows for third party information and data from citizen scientists to be incorporated as well as new science or changes in circumstances.

4. Invasive species management

In current legislation, particularly such as outdated *Forest Act 1958,* barriers to effective invasive species management is leading to large areas of native vegetation and habitat being lost due to this outdated Act. As well as critical habitat of the State and Commonwealth listed threatened species, ecosystems and landscapes.

4.1 Feral cats

Feral and free roaming domestic cats have an immense impact on local wildlife and negatively impact ecosystem integrity.

Predation by free roaming and feral cats is a key threatening process under the Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) as '*Predation by feral cats*'. Under Victorian state's threatened species legislation, the *Flora and Fauna Guarantee Act 1988*, the threats of cats to wildlife and ecosystems is listed under as '*Predation of native wildlife by the cat, Felis catus*'.

Although feral cats are declared an established pest animal on specified Crown land under the *Catchment and Land Protection Act 1994* the use of all tools to remove and reduce feral cats cannot be used.

The Felixer traps are an innovative tool being used across the country to remove feral cats, currently this tool is banned in Victoria.

In order to effectively manage feral cat numbers and protect wildlife and functioning ecosystems Felixer traps must be made available for use on all public and private lands in Victoria.

Victoria must also implement areas of public land where the goal is to eradicate feral cats such as areas with high densities of small marsupials and reptiles or ground living birds to name a few.

4.2 Feral horses

The numbers of feral horses throughout Victoria's eastern forests number between 2,000 -5,000 in the Eastern alpine region and 50-100 in the Southern Bogong High plains, both of which are within the Australian Alps.

Feral horses are listed as impacting at least 25 threatened alpine flora and 14 threatened alpine fauna species, including the broad toothed rat and rare alpine orchids.

Feral horses disrupt natural ecosystem functioning and damage habitats and water catchments in the Alps by: trampling, track creation, soil compaction, wallowing, erosion of streambanks, sphagnum bog and wetland destruction and overgrazing. [41]

Victoria has had a solid strategy for control of Feral horses and Victoria has made significant progress in putting in place plans and program for control of feral horses in national parks. Action has however been delayed on multiple occasions due to court challenges and need additional resourcing to ensure the program is ramped up and control is effective. The good work occurring in national parks is often undermined by a lack of control in adjacent state forests.

Under the *Forests Act* feral horses are classed as stock. This allows feral horses to spread un-managed, impacting wildlife and ecosystems and jeopardising control programs in protected areas such as national parks.

Degradation and Loss of Habitats Caused by Feral Horses is listed under Victoria's *Flora and Fauna Guarantee Act* (FFG) as the Threatening Process.

DEECA does not undertake control of feral horses in the State Forest as communicated by Minister Dimopulos in May 2024 [42]. The Minister States '*The Department of Energy, Environment and Climate Action does not undertake control of feral horses in adjoining state forests as feral horse control is not provided for under the Forests Act 1958*.'.

The absence of feral horse management in state forests is due to horses being considered 'livestock' in the *Forest Act* and is jeopardising gains made through control works undertaken by Parks Victoria in the Alpine National Park and NSW land managers Across the state border.

The Nunniong State Forest contains Alpine bogs and fens that should be protected by land managers under Commonwealth law, these bogs are being degraded due to lack of management by DEECA impeded by the *Forest Act.*

Feral horses must be declared an Established Pest under the *Catchment and Land Protection Act 1994* (CaLP Act) and protections for them removed from the *Forest Act*, or new tenure or zoning system created which allows for humane control.

[41] https://vnpa.org.au/publications/submission-impacts-and-management-of-feral-horses-in-the-australian-alps/
[42] Question on Notice:795 https://www.parliament.vic.gov.au/parliamentary-activity/questions-database/question-details/23276

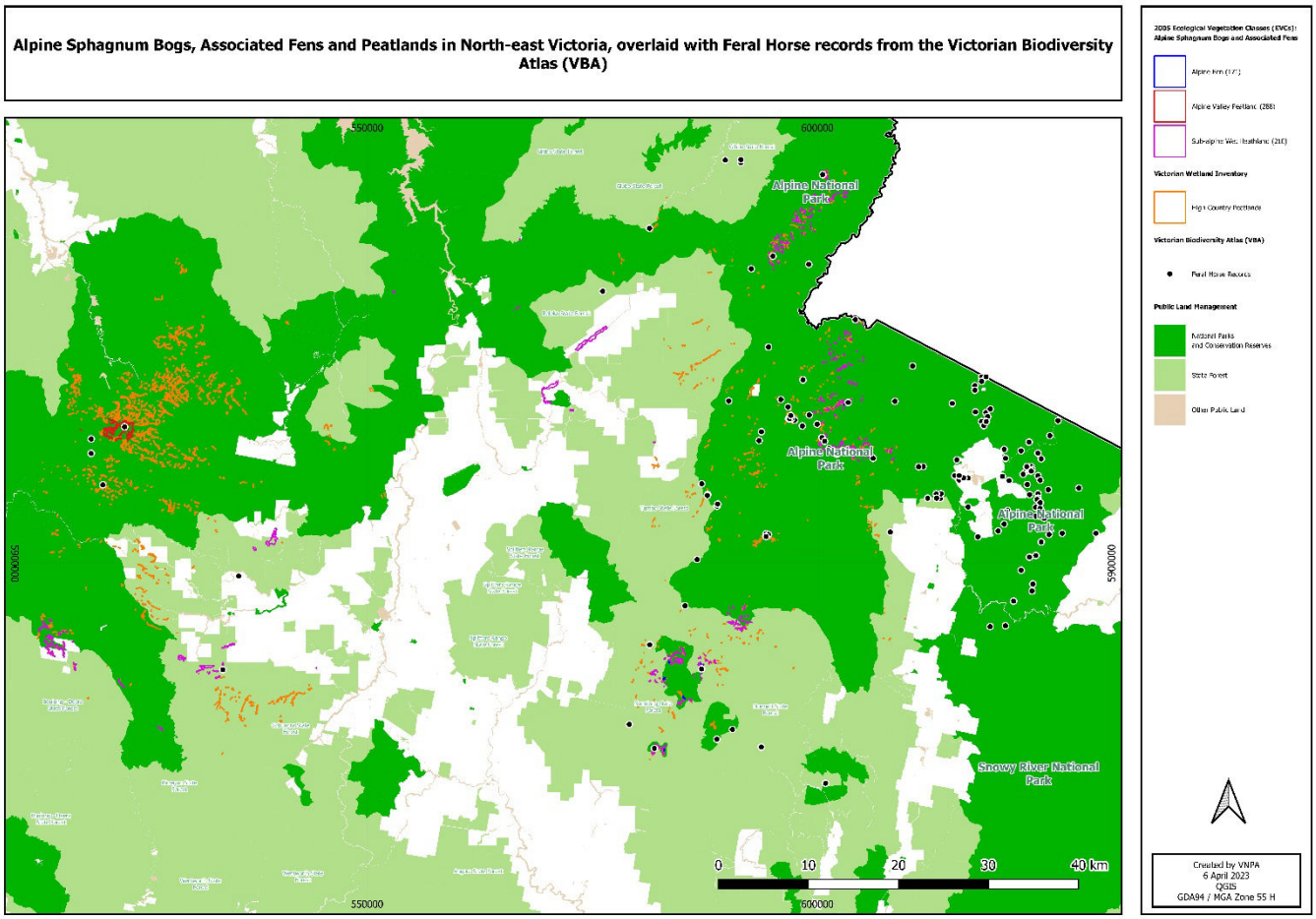


Figure 15. Feral horse records in relation to state forests and threatened Alpine Sphagnum Bogs and Associated Fens (VNPA, 2023)

4.3 Livestock grazing in state forests

According to the Action Statement [43] under the Victorian FFG Act (no. 266), Soil erosion and vegetation damage and disturbance in the alpine regions of Victoria caused by cattle grazing, highlights the physical damage caused by cattle grazing leads to detrimental impacts on a wide range of ecosystem processes, including:

- Increased soil compaction
- Increased soil erosion
- Interference with post-fire vegetation recovery
- Destruction of peatlands (and reductions in carbon storage)
- Damage to riparian vegetation and streams

[43] Soil_erosion_and_vegetation_damage_in_the_alpine_regions_caused_by-cattle_grazing_PTP_034.pdf

The Action statement suggests for state forests, the cattle grazing should be removed for high conservation areas and areas above 1000 meters and introduce special projections zones to protect them.

The GOT should recommend that stock grazing is immediately removed from areas above at least 1000 meters at a minimum and indicate a plan to phase out stock grazing in high conservation areas of state forests.

Relevant Actions from the Action Statement include:

Identify alpine vegetation types in State Forests and conservation reserves in which livestock grazing is currently permitted and examine options for protecting them from livestock	Consider options for removing cattle from all State Forest areas with sub-alpine vegetation or EPBC-listed bogs (peatlands) mapped in Departmental databases (areas generally above 1000 m elevation) Fence off sensitive alpine vegetation such as peatlands to prevent cattle access Provide water points independent of the vegetation community, such as spring-fed troughs	DELWP
Prevent access of cattle to sensitive areas	Consider options for removing cattle grazing above 1000 m where grazing impacts on the values of areas designated as Special Protection Zones (for flora protection purposes) under the Comprehensive Adequate & Representative (CAR) Reserve System (e.g. protection of old growth or protection of EVC). Consider options for removing cattle grazing above 1000 m in areas designated as Special Areas under the *Catchment and Land Protection Act 1994*. Implement removal programs for new or current small populations of wandering or wild cattle. Ensure protocols are in place to prevent stock wandering away from licensed grazing areas, or allow rapid detection and remediation of such wandering. Investigate reference areas to identify potential impacts of cattle grazing	DELWP

Figure 16. Actions to mitigate the impacts of potentially threatening process 'Soil erosion and vegetation damage and disturbance in the alpine regions of Victoria caused by cattle grazing' (DELWP, 2015).

4.3 Feral Deer control

Feral deer are now occupying every terrestrial habitat in the state, from the coastal dunes of East Gippsland to the High Plains, from the dry Mallee to Melbourne's streambanks.

Feral deer are implicated in the decline of rainforest and other threatened ecological communities across Victorias and are impacting over 1000 species of native wildlife.

It is estimated that 1 million deer cover Victoria, impacting private and public land. VNPA has long advocated for effective and science-based control and, where possible, eradication of deer populations,

including a 2024 letter from science, conservation, agriculture, land management and industry leaders. The letter can be read here.

According to the DELWP now DEECA, over a thousand species of flora and fauna would benefit from deer control efforts across Victoria due to being negatively impacted by feral deer[44]

Victoria remains the only mainland state to continue to protect deer as game species, making Victoria the centre of the national infestation of feral deer and will act as a key reservoir for national expansion if there is not significant action taken.

As recognised by the Federal Feral Deer Action Plan (2023) and the Victorian Deer Control Strategies (2020) recreational hunting alone is not on its own effective in controlling deer numbers[45] with the federal National Feral Deer Action Plan stating 'Current populations are too high to be controlled by recreational hunting alone or by recent control efforts, which have focused on small areas, or for short periods of time[46]'.

Figure 17. Left: Littoral Rainforest (EPBC listed as critically endangered) at Lake Bunga, part of the Lakes Entrance /Lake Tyers Coastal Reserve. The rubbed trees are mostly Yellowwood (Acronychia oblongifolia) listed as critically endangered under FFG Act, and endemic to eastern Australia (Photo by Tom Crook); Right: Fern Gully, Garfield North, adjacent to Bunyip State Park, where deer browsing has

[44] Victorian Deer Control Strategy (2020) Department of Environment, Land, Water and Planning
[45] Victorian Deer Control Strategy (2020) Department of Environment, Land, Water and Planning
[46] National Feral Deer Action Plan 2023–28, Commonwealth of Australia. www.feraldeerplan.org.au

greatly depleted understory and affected many plants including epiphytic orchids and the rare Jungle Bristle-fern Abrodictyum caudatum (Photo byA lan Forte)

As shown in the figure below the forests in the east of Victoria are a reservoir for feral deer species of Hog, Sambar and Fellow deer. *Reduction in biodiversity of native vegetation by Sambar (Cervus unicolor)* is listed as a potentially threatening processes under Victoria's *Flora and Fauna Guarantee Act 1988*, but remains without an Action Statement.

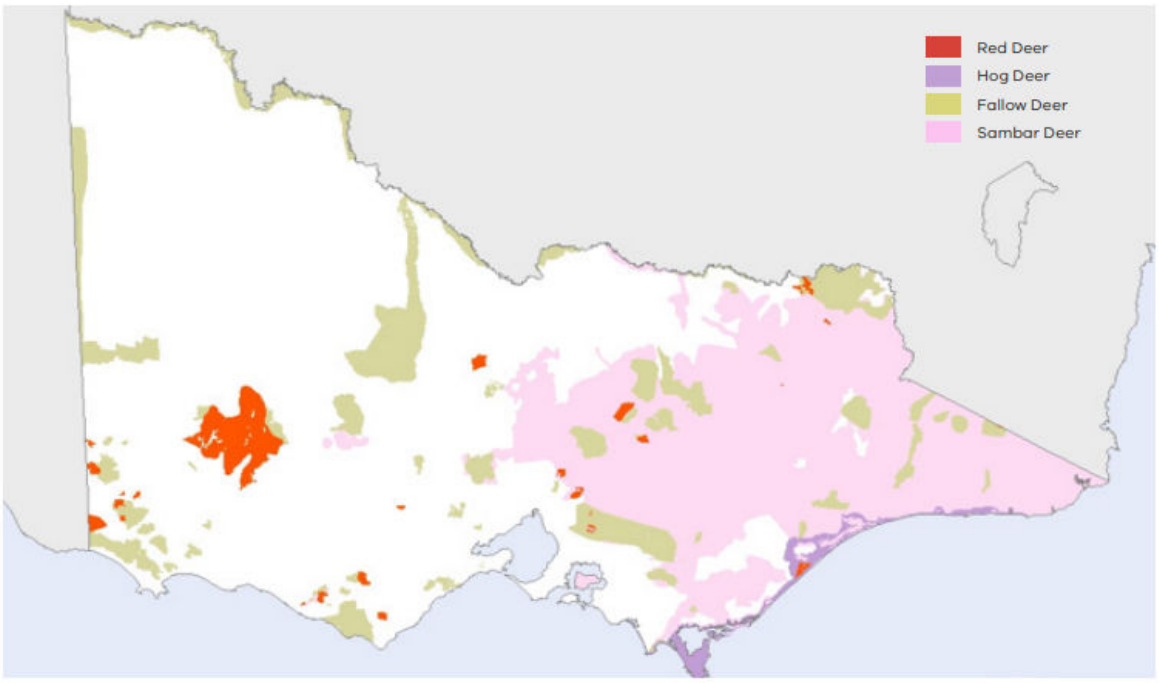


Figure 1 Estimated breeding distribution of deer (combined) in Victoria

Figure 18. Estimated breeding distribution of deer in Victoria

Feral deer are directly implicated in the decline of native plants and animals listed under Federal and Commonwealth legislation[47] such as but not limited too Prickly Tree-fern (Critically Endangered), Maiden's Wattle (Critically Endangered) and Tooarrana/Broad-toothed rat (Endangered)[48], a raft of threatened native fish.

Recreational shooting alone has been unable to keep control of feral deer number in Victoria with feral deer now out of control across Victoria. The explosion in feral deer numbers is having a disastrous impact on the ecology of the forests of Victoria's east but also increasingly impacting public safety and agricultural production.

[47] Flora and Funa Guarantee-Scientific Advosry Committee Final Recommendations for Listing, Reduction in biodiversity of native vegetation by Sambar (2007)
[48] THREATENED SPECIES SCIENTIFIC COMMITTEE Mastacomys fuscus mordicus (broad-toothed rat (mainland)) Conservation Advice (2016)

In recognition of the impact of feral deer the Victorian Government has developed a Deer Control Strategy [49] and Regional Deer Control Plans [50]along with a commitment of 19.25 million over four years and $4.4 million on going to control the impacts of deer.

While the deer controls strategies are welcome, they do not go far enough. What is left now is a complicated, confused and inconsistent policy position on feral deer in Victoria. There is a juxtaposition of feral deer being regarded a serious pest with government investment in control, while still being afforded legal protection status as a 'game species' with work arounds in place to resolve these differences. The community can well be excused for being confused about the status of feral deer.

It is a well-accepted principle that to control widespread invasive species such as feral deer, we need a landscape scale and cross tenure approach with access to a range of tools and tactics. This can't occur while some people view feral deer as a protected species while others are trying to deal with them as serious pests. While this may be beyond the scope of the GOT, there are clear need to support on-going deer control in state forests, beyond just ad hoc reactional hunting.

According to the Victorian Government East Victoria Deer Control Plan 2023–28 [51] deer are known to impact on the integrity of endangered ecological communities, from Littoral Rainforests and Coastal Vine Thickets to Alpine Sphagnum Bogs and Associated Fens (alpine peatlands); and consequently also impact on the habitat of various threatened flora and fauna.

The East Victoria Deer Control Plan 2023–28 use essentially an asset protection priortisation process:

- Prioritise areas where there is a legislative requirement to protect the environmental or cultural values (e.g. EPBC Act, FFG Act, *Aboriginal Heritage Act, National Parks Act*)
- Prioritise areas following the Biosecurity Approach - preventing deer incursions and eradicating smaller populations in isolated pockets to protect priority environmental or cultural values, before numbers are too large to manage and damage has already occurred.
- Prioritise areas where negative impacts from deer are evident on priority environmental or cultural values.
- Within waterways (using Index of Stream Condition), prioritise protection of areas in good condition ('protect the best') and protection of headwaters (where appropriate) to minimise downstream impacts.
- Focus control activities where it is necessary for the protection of the value (this may not necessarily be at the exact location of the value).

[49] https://www.environment.vic.gov.au/invasive-plants-and-animals/deer-control-program/deer-control-strategy
[50] https://www.environment.vic.gov.au/invasive-plants-and-animals/deer-control-program/regional-plans
[51] https://www.environment.vic.gov.au/invasive-plants-and-animals/deer-control-program/regional-plans/east-victoria-deer-control-plan

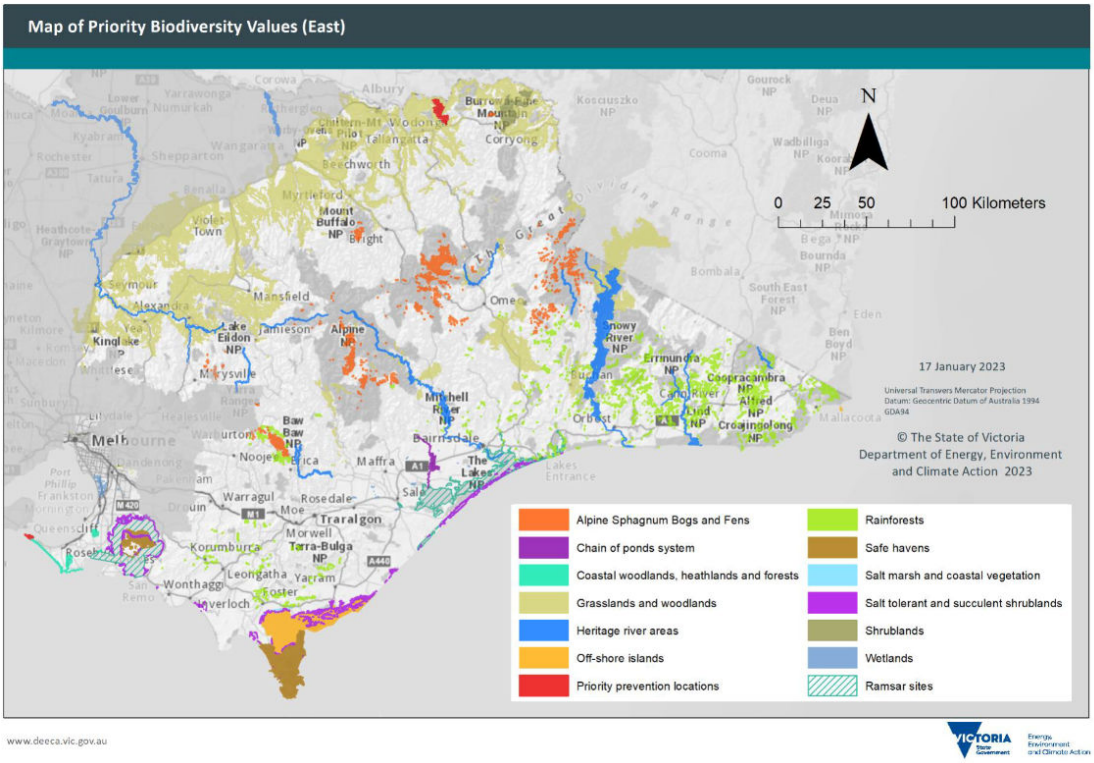


Figure 19. East Victoria Deer Control Plan biodiversity assets (DEECA, 2023)

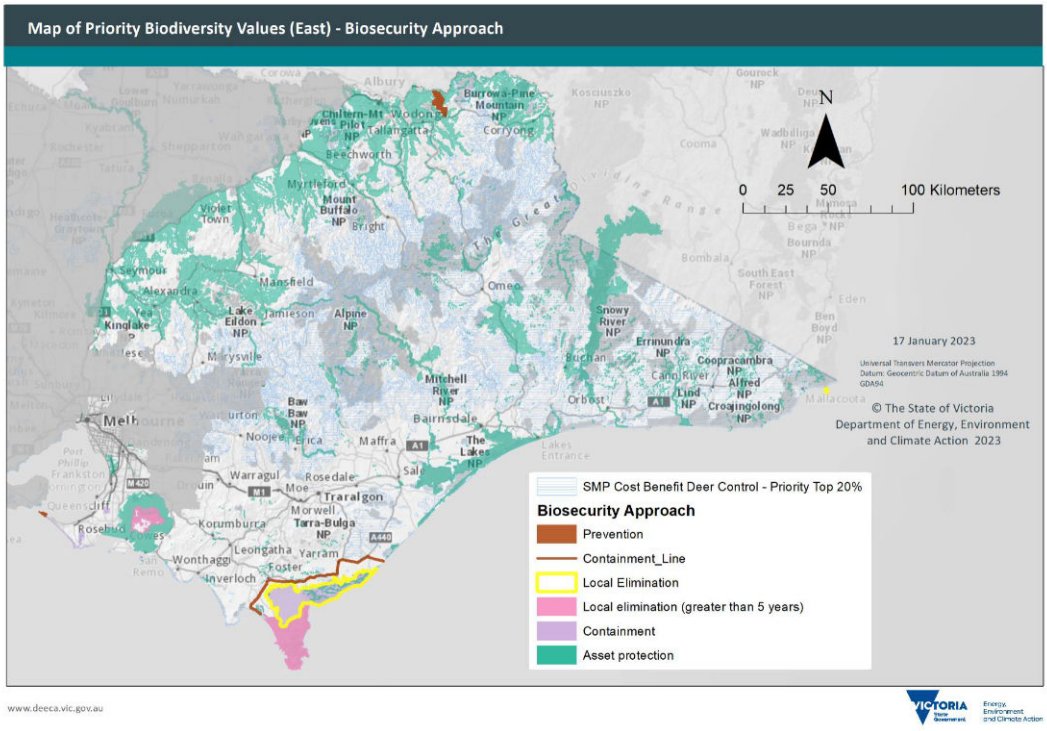


Figure 20. East Victoria Deer Control Plan – Biosecurity Priorities (DEECA, 2023)

This is relevant to the future of state forests. Deer will need to be managed on an on-going basis in state forest if key biodiversity areas and habitat are to be protected along with biosecurity.
Key reforms include

- Feral Deer be removed from the Wildlife Act 1975 and placed on the Catchment and Land Protection Act 1994 as a pest animal.
- Remove seasonal hunting restrictions on feral deer across Victoria.
- Where possible eradicate populations of feral deer from high conservation areas or where deer numbers are low for example Red Deer populations in the east of the state.

Additional opportunities include recognizing areas of high biodiversity importance and recognizing these areas in state forest management plans and or zoning systems. There is also a need to enhance funding for deer control programs and partnerships and structural instruments could also assist inform long term action. For example, deer prevention or asset protection zone could be critical for key habitats such Alpine Bogs or Rainforest areas, directly impact by deer and could be incorporated into state forest zoning system or relevant forest management plans.

Key Points – Section 4 Feral & Invasive Animals

Cats

- Feral and free roaming domestic cats have an immense impact on local wildlife and negatively impact ecosystem integrity. To effectively manage feral cat numbers and protect wildlife and functioning ecosystems:
- Felixer traps must be made available for use on all public and private lands in Victoria.
- Victoria must also implement areas of public land where the goal is to eradicate feral cats such as areas with high densities of small marsupials and reptiles or ground living birds to name a few.

Feral Horses

- Feral horses are listed as impacting at least 25 threatened alpine flora and 14 threatened alpine fauna species, including the broad toothed rat and rare alpine orchids in areas of state forest as well as national parks.
- The absence of feral horse management in State Forests is due to horses being considered 'livestock' in the Forest Act and is jeopardising gains made through control works undertaken by Parks Victoria in the Alpine National Park and NSW land managers Across the state border.
- Feral horses must be declared an Established Pest under the Catchment and Land Protection Act 1994 (CaLP Act) and protections for them removed from the Forest Act, or new tenure or zoning system created which allows for humane control.

Cattle

- Soil erosion and vegetation damage and disturbance in the alpine regions of Victoria can be caused by cattle grazing, which leads to detrimental impacts on a wide range of ecosystem processes,
- The GOT should recommend that stock grazing is immediately removed from areas above at least 1000 meters at a minimum and indicate a plan to phase out stock grazing in high conservation areas of state forests, in line with relevant Action Statement under FFG Act.

Feral Deer

- Feral deer are implicated in the decline of rainforest and other threatened ecological communities across Victoria including state forest in eastern Victoria.
- Recreational shooting alone has been unable to keep control of feral deer number in Victoria with feral deer now out of control across Victoria. and are impacting over 1000 species of native wildlife.
- Deer will need to be managed on an on-going basis in state forest if key biodiversity areas and habitat are to be protected along with biosecurity. Key reforms include
    - Feral Deer be removed from the Wildlife Act 1975 and placed on the Catchment and Land Protection Act 1994 as a pest animal
    - Remove seasonal hunting restrictions on feral deer across Victoria
    - Where possible eradicate populations of feral deer from high conservation areas or where deer numbers are low for example Red Deer populations in the East of the State
    - Recognizing areas of high biodiversity importance and recognizing these areas in state forest management plans and or zoning systems.
    - Enhance funding for deer control programs and partnerships

5. Impact of recreation on ecological processes and wildlife

As part of the Great Outdoors Taskforce (GOT) establishment is to 'Make recommendations to government to ensure shared benefits for all Victorians – focusing on building regional economies**, maximising tourism and recreation opportunities**, **while also ensuring forest values are protected for future generations'**.

There are broad international and a few interstate studies on the impacts of recreational activities on water quality[52], wildlife behavior and breeding[53], off-road vehicle use leading to increased soil erosion, compaction and water quality issues[54] to name a few.

As highlighted in many reviews and studies the understanding of the impact of recreational activities locally is relatively low[55] and needs to be increased in order to make informed decisions about land management.

Part of Victoria's tenure system was established to deal with matching levels of protection for high conservation areas and appropriate recreational use.

In order for the GOT and the Victorian Government to make informed and evidence based decisions about increased recreational activities in state forest while also ensuring forest values are protected for biodiversity values there is a strong need for the GOT funds a comprehensive assessment of the ecological impact of recreational activities on wildlife, habitats and ecosystem functions such as water production, carbon storage and wildlife habitat that is relevant to Victorian ecosystems and wildlife.

It is imperative that the GOT commissions an independent study on the impact of recreation on Victoria's wildlife and ecosystem functions in order to inform decisions about the future of Victoria's public lands.

5.1 Trout releases causing wildlife decline – Native fish refuges

The release of exotic trout species native to the northern hemisphere into Victorian Creeks, rivers and billabongs is implicated in the decline of native Victorian freshwater fish through direct predation, competition for food and suitable habitat as well as spread of pathogens.[56]
The health of freshwater ecosystems and wildlife have been found to be in decline across Victoria[57] as shown in the table below from the State of the Environment Report 2023.

[52] Bath, Andrew & Miller, Rachael & Walker, Richard. (2012). Parliamentary Inquiry: Recreation in West Australian drinking water catchments.
[53] Experimental recreationist noise alters behavior and space use of wildlife Zeller, Katherine A. et al.Current Biology, Volume 34, Issue 13, 2997 - 3004.e3
[54] Havlick, David G. 2002. No Place Distance: Roads and Motorized Recreation on America's Public Lands. Island Press. Washington D.C.
[55] D. Sun, D. Walsh, Review of studies on environmental impacts of recreation and tourism in Australia, Journal of Environmental Management, Volume 53, Issue 4, 1998, Pages 323-338, ISSN 0301-4797, https://doi.org/10.1006/jema.1998.0200
[56] Cadwallader, P. (n.d.). OVERVIEW OF THE IMPACTS OF INTRODUCED SALMONIDS ON AUSTRALIAN NATIVE FAUNA by prepared for the Australian Nature Conservation Agency. [online] Available at: https://www.dcceew.gov.au/sites/default/files/documents/salmonids.pdf.
[57] Victorian State of the Environment 2023 Report, Report Indicators. Commissioner for the Environmental Sustainability Victoria

B:17 Threatened large-bodied freshwater fish species			
Region(s)	2023 status	2023 trend	2023 confidence
Statewide			
Data source(s):	DELWP		

B:18 Threatened small-bodied freshwater fish species			
Region(s)	2023 status	2023 trend	2023 confidence
Statewide			
Data source(s):	DELWP		

Figure 21. Victorian State of the Environment 2023 Report, Report Indicators. (Commissioner for the Environmental Sustainability, 2023)

Victoria is a hot spot for decline of native freshwater fish populations as shown in Figure 1 below, with a high number of native freshwater fish species threatened with extinction[58].

National and State conservation organisations have called for the creation of trout-free safe haven for native fish species to avoid the imminent extinction of some types of native fish.[59]

The GOT should consider trout-free safe havens for vulnerable native fish from the spread of invasive trout and exotic fish species, this could be included as part of potential forest zoning system for high conservation areas.

[58] Mark Lintermans et al. (2024) Troubled waters in the land down under: Pervasive threats and high extinction risks demand urgent conservation actions to protect Australia's native freshwater fishes, Biological Conservation, Volume 300,2024, 110843, ISSN 0006-3207,https://doi.org/10.1016/j.biocon.2024.110843.

[59] Victorian National Parks Association (2024). Native fish extinction almost guaranteed without urgent intervention . [online] Victorian National Parks Association. Available at: https://vnpa.org.au/native-fish-extinction-almost-guaranteed-without-urgent-intervention/ [Accessed 29 Nov. 2024].

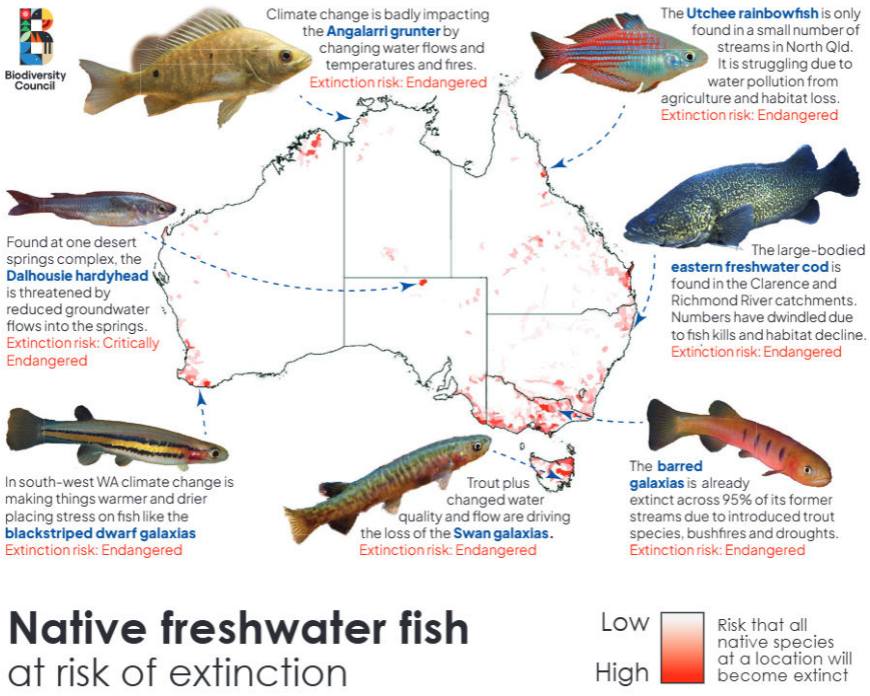


Figure 22. A map of extinction risks across Australia with examples of fish at risk and their IUCN Red List category. Red areas have a high risk of their native species becoming extinct. White areas have a low risk. Pink is moderate. Fish images clockwise from top left: Michael Hammer, ANGFA Qld, Brett Vercoe, Steven Kuiter, Inland Fisheries Service, Gerald R Allen, Michael Hammer. Overall figure: M. Lintermans, N. Whiterod and J. Dielenberg (Biodiversity Council, 2024)

5.2 Managing impact of prospecting on natural and cultural values

As found in a 2014 study into expanding prospecting in National Parks in Victoria, State body VEAC states that 'While it is recognised that recreational prospecting can be low impact, it is clear that it can also result in damage to natural and cultural heritage values, especially in waterways, but also in other vulnerable environments'.[60]

Washing of soil to reveal minerals and stones through sluicing and to a lesser extent panning increases the amount of sedimentation and decreases water quality and oxygen levels as well as releasing contaminated materials such as arsenic and mercury from historic land uses in some cases.

Prospecting can have a bigger direct impact in some places than many other recreational pursuits on species such as native orchids, freshwater invertebrates and vertebrates such as Platypus. To become degraded and disturbed and impact fragile ecological values particularly frogs and native orchids.

[60] https://www.veac.vic.gov.au/investigations-assessments/previousinvestigations/investigation/investigation-into-additional-prospecting-areas-in-parks

This makes planning of where prospecting should and should not occur important on many levels including water quality, ecology protection and animal welfare. However, this is also not straight forward. The consultants report produced for 2014 VEAC notes:

> *'The risks will vary depending on the specific location, because different locations have different stream characteristics and some locations may have species present which have particular conservation significance. The risks would also depend on the intensity of the prospecting activity at a particular site – the number of prospectors, the time of year, the extent of the prospecting and the frequency of prospecting, with higher intensity prospecting posing greater ecological risks.'* [61]

You can fossick and pan for gold in a state forest if you have a Miner's Right permit. There are very basic rules about where you can go and the type of equipment you can use to ensure vulnerable areas and waterways aren't disturbed. Fossicking rules and responsibilities - Resources Victoria
Basic rule in state forests and areas within certain areas of national parks include:

- Prospect only in the permitted area
- Only drive your vehicles on tracks and roads open to the public.
- Only park your vehicle on the roadside.
- Take all rubbish home or place it in a bin where provided. Do not bury it.
- Minimise any damage to vegetation including the ground layer.
- Restore the ground as you found it - backfill any holes you dig and replace any leaf litter as it was as soon as practicable.https://www.parks.vic.gov.au/things-to-do/fossicking-prospecting

In its 2014 investigation VEAC recommended clarifying and updating legislation (R2)

> *That the status of legislative provisions relating to activities associated with recreational prospecting be assessed, clarified and updated as follows:*
> *(a) that rules be clearly specified around the use of motorised equipment in processing gravel and other material for minerals excavated with hand tools*
> *(b) that rules be clearly specified for permissible volumes of material, and timeframes for repair of damage*
> *(c) that the status of excavation of gravels and soil and interference with vegetation associated with recreational prospecting in waterways be clearly specified in the by-laws or regulations arising from the Water Act related to activities and works on waterways*
> *(d) that the areas of restricted and unrestricted Crown land where recreational prospecting is permitted be clarified and appropriately gazetted and regulated*
> *(e) that consideration be given to provisions to improve enforcement such as definitions of recreational prospecting and recreational prospecting equipment, prohibiting carriage of prospecting equipment in certain areas, and scaling of penalties relating to failure to 'repair' according to the severity of damage.*

The government response to the VEAC report supported this recommendation in principle:

[61] Campbell, I (2014) The Potential Impact of Minerals Prospecting on Streams in Victorian National Parks. What can we tell from the scientific literature: A review conducted for VEAC, April 2014. https://www.veac.vic.gov.au/investigations-assessments/previousinvestigations/investigation/investigation-into-additional-prospecting-areas-in-parks

'The Government will establish a working group led by the Department of Environment and Primary Industries to recommend the most appropriate way to ensure an effective compliance regime is established and that any necessary legislative amendments are made, including the ban on the use of mechanical devices as detailed.'

It is unclear if this was done comprehensively, though rules around some use of mechanised equipment appear to have been strengthened, though the rule are still less explicit when compared to NSW, especially in terms of amounts of materials to be removed, levels of soil disturbance and recovery activities (see below). NSW also has an active zoning system in state forest which prohibit fossicking in some areas mainly along rivers and water ways and forestry sites.

Figure 23. Areas where fossicking is not permitted in state forests adjacent to the Victorian border (denoted in pink) (Forestry Corporation NSW, 2025) 62

[62] https://www.forestrycorporation.com.au/visit/activities/fossicking

Table 1: Overview Comparison between NSW & Vic Fossicking & Prospecting Regulation.

Vic *Fossicking rules and responsibilities - Resources Victoria*	*NSW* *Fossicking: A guide to fossicking in NSW*
You can use picks, shovels, hammers, sieves, shakers, electronic detectors, and other similar tools. *Only non-mechanical and hand tools are permitted for the purpose of excavation.* *No machinery is permitted, and no explosives can be used on the land.*	*The use of explosives and any power-operated equipment for the purpose of surface disturbance, excavation or processing on any land, as a part of fossicking in NSW, is strictly prohibited.*
To minimise impacts from fossicking activities: • *Drive vehicles on tracks or roads open to the public and park your vehicles on the roadside.* • *Do not bury rubbish. Take it home or put it in a bin if provided.* • *Minimise any damage to vegetation including the ground layer.* • *Immediately restore the area to how you found it, i.e. backfill any holes you dig and replace leaf litter.*	*Surface disturbance restrictions* *Soil, rock and other materials disturbed during fossicking must be removed and stockpiled separately.* *These materials must be replaced after completion to reconstruct the original soil profile.* *In addition to this, no more than one cubic metre of any soil, rock or other material can be disturbed during any single 48-hour period. Bushrock must not be damaged or removed.* *Any fossicking site must be left in a clean and tidy condition. All refuse, including bottles and cans must be removed from the site.*
None	*3. Restrictions on material taken* *The following limits apply on the amount of material that can be taken per person during any single 48-hour period:* *• 10 kilograms of mineral-bearing material (containing gold or gemstones)* *• 5 kilograms of minerals (other than gold or gemstones)* *• 5 nuggets of 10 grams or greater of gold* *• 50 grams of gold (except where found as nuggets of 10 grams or greater)* *• 100 grams of gemstones*
Largely no restrictions in state forests, except prohibited crown land. Prohibited Crown land is land where recreational prospecting is banned and includes land that is: • *a park under the National Parks Act 1975 including land that is a national, wilderness, State or other park or reserve or a marine national park or marine* • *sanctuary, except in designated areas of specific parks under that Act (see Permitted Areas in Certain Parks under the National Parks Act);* • *a declared area for ongoing protection under the Aboriginal Heritage Act 2006;* • *a reference area under the Reference Areas Act 1978;* • *a Deep Lead Nature Conservation Reserve (No. 2) under the Crown Land (Reserves) Act 1978;* • *an area exempted by the Minister for Energy and Resources or Minister for Environment, Climate Change and Water; or* • *an area exempted from recreational prospecting or an extractive industry or otherwise exempted under the Mineral Resources (Sustainable Development) Act 1990 or any other Act.*	*Fossicking is allowed with a permit in many NSW State forests. Permits are valid for 12 months and allow small scale fossicking for recreational, tourist or educational purposes in State forests across NSW.* *Further information about fossicking in NSW State forests, including how to apply for a fossicking permit and maps showing where fossicking is or is not permitted, is available from the Forestry Corporation atforestrycorporation.com.au/visit/activities/fossicking* *(Essentially a zoning system or areas were fossick is not allowed … see below)* *In 2010, an amendment was made to the Mining Regulation to limit the prohibition on powered equipment that was used only for the purpose of surface disturbance, excavation or processing. This change allowed the use of metal detectors in fossicking, provided that there is no surface disturbance.*

Fossicking and prospecting on rivers and streams is one of the major impacts of recreational prospecting, especially on water quality and water way biota. There is an extensive list of over 250 rivers and streams in Victoria were recreational fossicking and prospecting are not allowed [63]. It is unclear in the guidance the area covered by the water way e.g. just bed and banks or riparian strip. It is also unclear if this is actively enforced. This scheme could be strengthened by providing interactive spatial data on the area involved similar to NSW and as part of a broader state forest zoning system. This would give clear guidance to prospectors to avoid sensitive areas (see below for example)

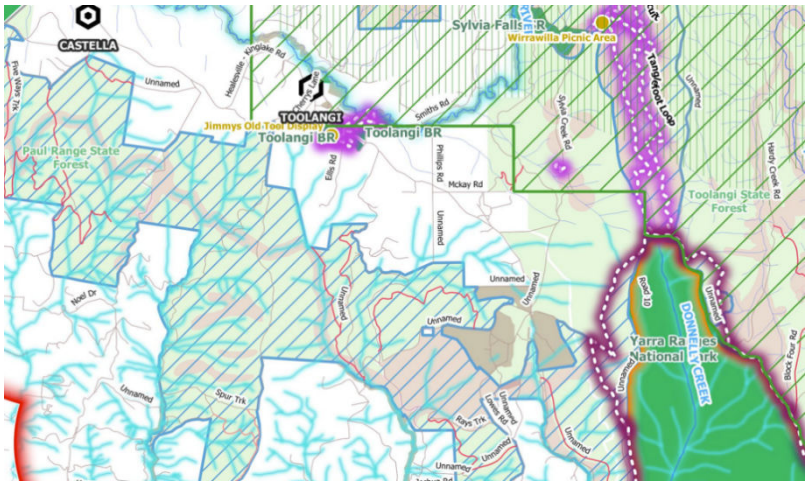
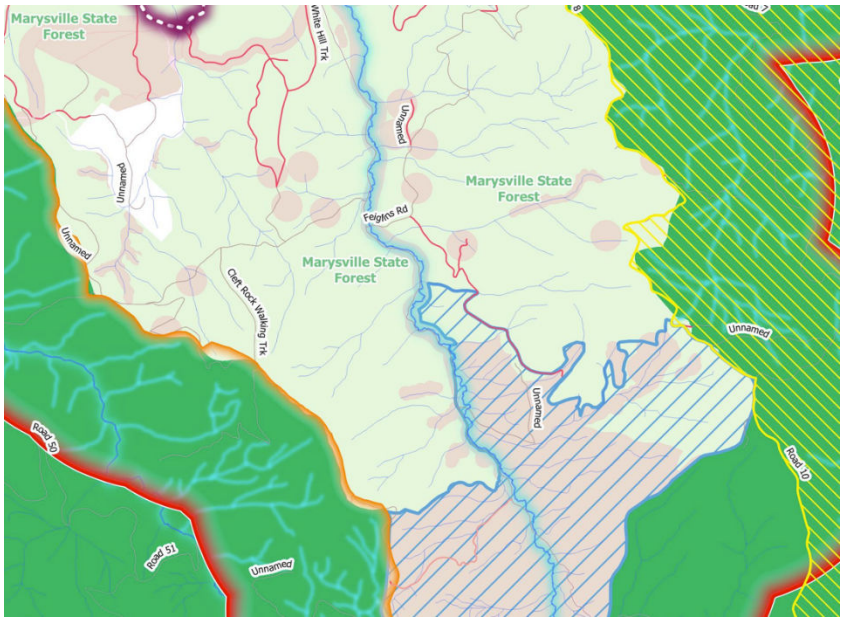


Figure 24. Tributaries of the Yarra River where fossicking/prospecting is not permitted in Paul Range State Forest (denoted in light blue)



[63] https://resources.vic.gov.au/licensing-approvals/fossicking/where-you-can-prospect-and-fossick/rivers-and-streams-where-you-cant-fossick

Figure 25. The Acheron River where fossicking/prospecting is not permitted in Marysville State Forest (denoted in light blue)

Key points – Chapter 5 - Impact of recreation on ecological processes and wildlife

Understanding recreation Impacts

- Impacts of recreational activities on water quality, wildlife behavior and breeding, off-road vehicle use leading to increased soil erosion, compaction and water quality issues have been highlighted in international and national studies but the local understanding of the impact of recreational activities is generally low and needs to be increased in order to make informed decisions about land management.
- It is imperative that the GOT commissions an independent study on the impact of recreation on Victoria's wildlife and ecosystem functions in order to inform decisions about the future of Victoria's public lands

Native Fish Protection

- Victoria is a hot spot for decline of native freshwater fish populations with a high number of native freshwater fish species threatened with extinction.
- The GOT should consider trout-free safe havens for vulnerable native fish from the spread of invasive trout and exotic fish species, this could be included as part of potential forest zoning system for high conservation areas

Prospecting & Fossicking

- Recreational prospecting can be low impact, but it is clear that it can also result in damage to natural and cultural heritage values, especially in waterways, but also in other vulnerable environments
- Some forms of prospecting and fossicking can impact on water quality and water way biota and species such as, freshwater invertebrates and vertebrates can be effected.
- There are only very basic rules about where you can go prospecting and fossicking and the type of equipment you can use to ensure vulnerable areas and waterways aren't disturbed. The rules in Victoria are less explicit when compared to NSW
- There is an extensive list of over 250 rivers and streams in Victoria were recreational fossicking and prospecting are not allowed but it is unclear if it is actively enforced
- This could be strengthened by providing interactive spatial data on the area involved similar to NSW and as part of a broader state forest zoning system. This would give clear guidance to prospectors to avoid sensitive areas.

6. State forest ecological management issues

6.1 Ecological restoration of degraded forests

State owned native forest logging company VicForests (now abolished) were responsible for regrowing trees logged by their enterprise.

Subsequent studies and investigations have found vast areas of public native forests have not been regrown by foresters and VicForests after logging (13,000ha), an estimated 30 per cent or more have not regrown post logging[64].

Forests that have been regrown have been heavily modified and degraded by logging with many biodiversity values lost such as large and hollow bearing trees, species diversity, ferns and in many cases Eucalypt trees.

There is a need to restore native forests both those that have been regrown and those that have failed to regenerate using ecological restoration methods not forestry and silvicultural based methods.

The terms forest management or active management are observed to be cover for continued forestry/silviculture management that has led to this mess.

Restoration will need to be undertaken for significant areas of failed regeneration, and should be done using best available ecological approaches which use the National Standards for the Practice of Ecological Restoration in Australia as well as incorporating local indigenous knowledge.

The Standards list (i) the principles that underpin current best practice ecological restoration and (ii) the steps required to plan, implement and monitor restoration projects to increase their chance of success. The Standards are applicable to any Australian ecosystem (whether terrestrial or aquatic) and any sector (whether private or public, mandatory or non-mandatory) [65]

The standard are framed around six principles:

- Principle 1 Ecological restoration practice is based on an appropriate local native reference ecosystem
- Principle 2 Restoration inputs will be dictated by level of resilience and degradation
- Principle 3 Recovery of ecosystem attributes is facilitated by identifying clear targets, goals and objectives
- Principle 4 The goal of ecological restoration is full recovery, insofar as possible, even if outcomes take long timeframes or involve high inputs

[64] Blakers (2021) After the Logging:Failing to regrow Victoria's native forests
[65] https://www.seraustralasia.com/standards/home.html

- Principle 5 Restoration science and practice are synergistic
- Principle 6 Social aspects are critical to successful ecological restoration

In the context of EPBC Act listed threatened ecological communities, such as Alpine Ash forests (proposed for endangered listing), their restoration could be achieved through well-funded Recovery Plans which incorporate the best ecological science and expertise available.

6.2 Protecting big and old trees

The decline of large and old trees is happening across all land types and tenures; from the suburbs, to farms, state forests and national parks. The loss of large, old and hollow-bearing trees is recognised as a key threat to native forests and woodlands according to Victoria's primary threatened species law, the *Flora and Fauna Guarantee Act 1988* (FFG Act).

If the Redwoods of California can bring tourism and economic development[66], Victoria too can have this type of nature-based, sustainable tourism enhanced by appropriate track creations and visitor facilities.

Victoria has a decreasing number of impressive old trees spread across the forest estate. Protecting these trees and installing appropriate visitor infrastructure would bring greater ecological and economic benefits than their destruction and that of the surrounding forests.

These trees provide vital habitat for many Australian animals, are instrumental in tackling climate breakdown, as well as being living legacies that should be preserved and treasured by the community for many more years to come.

To do this, we must improve the care and management of these living monuments. The management options are well-documented and laid out in the VNPA document: Protecting our living legacies: a guide to protecting large old trees on public land, 2024, as well as in countless standards and scientific papers.[67]

VNPA, with the help of heritage and arboricultural experts, has written a plan to protect large and old trees across public lands in Victoria with a Log of Claims that outlines 21 principals that will assist in protecting significant trees across Victoria's public land estate.

These principles should be incorporated into relevant policy, regulation and operating procedures and planning. These principles are relevant to the Code of Practice for Timber Production or it predecessors such as Code of Practice for State forest and its associated procedures across public and private land, planning and acknowledgement within the Joint Fuel Management Programs (JFMP), Code of Practice for Bushfire Management on Public Land (2012) and Strategic Bushfire Management Plans and Burn Plans, and any other policies leading to a decline of large old trees.

[66] National Parks Service (2019) Economic Benefit of Redwood National Park. 7 June. https://www.nps.gov/redw/learn/news/2018visitorspending.htm
[67] Pages 6 and 7 https://vnpa.org.au/wp-content/uploads/2024/03/Protecting-our-living-legacies-flip.pdf

This document and its recommendations can be used as a relevant reference in the transition out of native forest logging and future management of state forests highlighting the importance of old and old trees for their ecological importance. It can help direct future land tenure changes to incorporate stands of old and significant trees into the protected areas estate and planning of future visitation ventures around these trees.

6.3 Firewood Collection and impact on habitat loss

Currently, the Victorian Government allocates and manages sites for seasonal domestic firewood collection throughout Victoria's eastern state forests. With most firewood being sourced from private land (72 per cent), the collection of firewood in state forests through these designated sites contributes comparatively low to the total supply for Victorians (less than 11 per cent) [68].

Permitted collection of wood in these areas only includes that of trees and branches that are already on the ground and are not visibly hollow, amongst other restrictions. It's illegal for members of the public to cut down standing trees or branches (whether live or dead) in state forests, a measure which is in place to 'protect habitat for our wildlife and protect forest health.' [69]

Empirical studies on the impacts that firewood collection has on Victoria's flora, fauna and ecological processes are largely lacking and remain a critical knowledge gap that requires further exploration. [70] There are some studies that have looked into the importance of course woody debris for native fauna, which includes the logs, stumps, standing dead trees, dead branches and whole fallen trees in a forest [71]. These make up the key ecological features targeted for domestic firewood collection throughout state forests.

Studies in northern Victoria manipulated the amounts of course woody debris in River Red Gum floodplains and found that Yellow-footed Antechinus and Brown Treecreeper responded positively to increased loads and elevated densities of coarse woody debris. [72]

Another study manipulated coarse woody debris in Victoria's Terrick Terrick National Park and found evidence of seasonal and spatial usage of these refuges by several vertebrate species, including the threatened Fat-tailed Dunnart and Curl Snake. [73]

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[68] Victoria's Firewood Strategy for Public Land (DSE, 2009), page 24
[69] Collecting firewood | vic.gov.au
[70] Ecological impacts of firewood collection — a literature review to inform firewood management on public land in Victoria (University of Melbourne, 2009), page vii
[71] Ecological impacts of firewood collection— a literature review to inform firewood management on public land in Victoria (University of Melbourne, 2009), page 3
[72] Ecological impacts of firewood collection — a literature review to inform firewood management on public land in Victoria (Univeristy of Melbourne, 2009), numerous studies referenced on page 12
[73] Michael D (2001) Vertebrate fauna in a semi-arid grassland at Terrick Terrick National Park, Victoria: distributions, habitat preferences and use of experimental refuges. B.Sc. (Hons) thesis, Charles Sturt University. Albury; and
Michael DR, Lunt ID, Robinson WA (2004) Enhancing fauna habitat in grazed native grasslands and woodlands: use of artificially placed log refuges by fauna. Wildlife Research 31, 65-71.

There is a large amount of inferential and correlative evidence to suggest the removal of coarse woody debris from state forests is impacting threatened wildlife and habitats. Using reptiles as an example, fifty-seven species across south-eastern Australia depend on, or use coarse woody debris (e.g. logs).[74] Reptiles use logs for a variety of purposes, including basking, nesting, shelter, hibernation and foraging. [75] Large logs which are able to retain moisture, may also provide refuge during drought or fire.[76] Nineteen species of native birds in Victoria were considered to be threatened by firewood collection according to another study.[77] The Australian Owlet Nightjar, being one example, roosts and nests in standing and fallen timber.[78] Mammals, such as the Vulnerable White-footed Dunnart and the Endangered Spot-tailed Quoll, also depend on or use coarse woody debris for functions such as foraging, nesting and sheltering [79].

The state forest areas covered by the GOTs investigation no doubt contains many forest-dependent wildlife, including threatened species, which rely on and are threatened by, the removal of course woody debris and the ecological functions which they provide. This is reflected in Action Statements for threatened species under the state's *Flora and Fauna Guarantee Act 1988*, which identify and list firewood collection as a key threat for wildlife such as the Critically Endangered Masked Owl [80].

If the allocation of domestic firewood collection sites are to continue, the Victorian Government should undertake a thorough and rigorous scientific process to determine the impacts of firewood collection on forest-dependent wildlife and habitats, as well as cultural and recreational values, and mitigate impacts. Impacts could be mitigated through the zoning process, using both landscape and detection-based zonings. For example, landscape-scale no-go zones could be established which restrict domestic firewood collection in areas which would jeopardise the protection of key cultural, recreational and natural values (e.g. threatened species). A detection-based zoning system could also be managed on an ongoing basis to incorporate new information (e.g. new detections of threatened species), which would introduce new protections and exclusion areas (such as exclusion buffers around key values) from domestic firewood collection as new information is gained.

To the best of our understanding, the former (landscape-scale restrictions) already exists through the designation of Special Protection Zones (SPZs) in state forests [81]. It's unclear if (and we seek assurance that) the Government is actively implementing this policy and restricting domestic firewood collection sites within SPZs, but this certainly should be the case and would form a good starting point for management.

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[74] Lindenmayer DB, Claridge AW, Gilmore AM, Michael D, Lindenmayer BD (2002) The ecological roles of logs in Australian forests and the potential impacts of harvesting intensification on log-using biota. Pacific Conservation Biology 8, 121-140.
[75] Ecological impacts of firewood collection— a literature review to inform firewood management on public land in Victoria (University of Melbourne, 2009), page viii
[76] Ecological impacts of firewood collection— a literature review to inform firewood management on public land in Victoria (University of Melbourne, 2009), page viii
[77] Garnett ST, Crowley GM (2000) 'The Action Plan for Australian Birds.' (Environment Australia: Canberra)
[78] Ecological impacts of firewood collection— a literature review to inform firewood management on public land in Victoria (University of Melbourne, 2009), page 13
[79] Ecological impacts of firewood collection— a literature review to inform firewood management on public land in Victoria (University of Melbourne, 2009), page 107
[80] Action statements
[81] North East Victorian Firewood Strategy (North East Catchment Management Authority, 2004)

New research on the impacts of domestic firewood collection on key natural, cultural and recreational values should ultimately inform the landscape-scale and detection-based zoning restrictions and prescriptions throughout state forest.

If domestic firewood collection is to be permitted in areas of the GOTs investigation area, there is a need for enhanced planning, monitoring, education and regulation by DEECA. The VNPA have visited domestic firewood collection sites in the Otways Forest Park and have strong concerns about the following (See Figure 26 below):

- Lack of scientific understanding and monitoring of impacts to natural values (e.g. threatened species)
- Lack of protections and zonings in place to protect at-risk wildlife and habitats
- Lack of transparency around the selection process for domestic firewood collection areas
- Over-cutting (which likely compromises the natural, recreational and possibly cultural values)
- Increased in-situ fuel loads at the surface, near ground and elevated levels
- Inadequate monitoring and enforcement for illegal cutting and take of firewood'

Lack of educational resources and programs invested for domestic firewood collection, and the importance of coarse woody debris for native wildlife and habitats

Figure 26. Victorian Government's Domestic Firewood Collection Site in the Otways Forest Park, along Pipeline Road (VNPA, 2023).

Illegal firewood take

Unfortunately, the illegal take of firewood throughout Victoria's state forests is becoming an increasingly large issue. The state's Office of the Conservation Regulator is charged with the regulation of this issue, but inadequate funding and resourcing is blocking their ability to take control of the issue. The issue of illegal firewood take does not just relate to coarse woody debris on the forest floor but includes standing trees. An article reports that: [82]

[82] Crackdown on the sale of illegal firewood | Ranges Trader Star Mail

'In 2023 alone, firewood thieves are estimated to have destroyed or damaged 9200 native trees and cleared roughly 462 hectares of forest.
'With nearly 10,000 trees destroyed last year alone, the impact is far-reaching, threatening the survival of native species and damaging irreplaceable Aboriginal cultural sites,'
'This unsupervised collection means that there are no concerns for the local biodiversity and environment, and also is usually performed in an unsafe manner, endangering other forest users,'

Throughout the GOTs investigation area, the issue of illegal firewood take is occurring widespread. This threatens the safety of recreational forest users and tourists, whilst also destroying key natural and cultural values, including threatened species populations and habitats. The Victorian Government must invest more funding and resources towards the Conservation Regulator to tackle this issue, which is identified as a regulatory priority for 2024-25 [83]. We need more enforcement officers monitoring our forests (both actively and remotely), and greater penalties for non-compliance. Enforcement resources could be prioritised in accordance with a zoning system, to protect areas of key natural, cultural and recreational significance from impacts.

In New South Whales, the removal of dead wood is formally acknowledged and listed as a key threatening process under the state's nature laws [84]. The Victorian Government should follow suit and formally acknowledge this as a potentially threatening process under Victoria's *Flora and Fauna Guarantee Act 1988.*

Establishment of firewood lots ideally mixed species should be encouraged by government on private land to transition firewood collection out of public forests. The government should also assess the opportunity for community firewood lots, on already cleared public land. Consideration should also be considered for appropriate pricing and permitting of firewood from state forest to reduce the illegal take for designated domestic fire areas

6.4 Reducing the impact of roads and tracks

Many of the tracks and roads within forested areas were installed as a way of extracting trees during native forest logging operations, with the end of logging on public land these tracks are no longer needed and should be rehabilitated to allow wildlife to move freely through the landscape as well as reducing the spread of invasive species and reduce points of ignition for bushfires caused by neglected camp fires or arson.

Habitat fragmentation as a threatening process for fauna in Victoria (No Action Statement) is listed as a potentially threatening process under the *Flora and Fauna Guarantee Act 1988* (FFG Act) meaning this process has the 'may have the capability to threaten the survival, abundance or evolutionary development of any taxon or community of flora or fauna' [85]

[83] Conservation Regulator Regulatory Priorities 2024 – 2025
[84] Removal of Dead Wood - key threatening process overview (PDF - 45 KB)
[85] Flora and Fauna Guarantee Act 1988 – Potentially Threatening Processes List May 2023, Department of Environment, Land, Water and Planning

As highlighted by DSE (now DEECA) in 2008 'Opening new forest roads and tracks increases access, and while this can assist in getting to fires, it can also lead to more ignitions. Close to 25% of human caused fires on public land occur within 100 meters of roads and tracks and nearly 90% occur within one kilometre[86], analysis by Dr. Michael Feller delivered to the Royal Society of Victoria in 2024 found that 55% of bushfires are started by people including arson and campfires, with the largest area burnt [87].

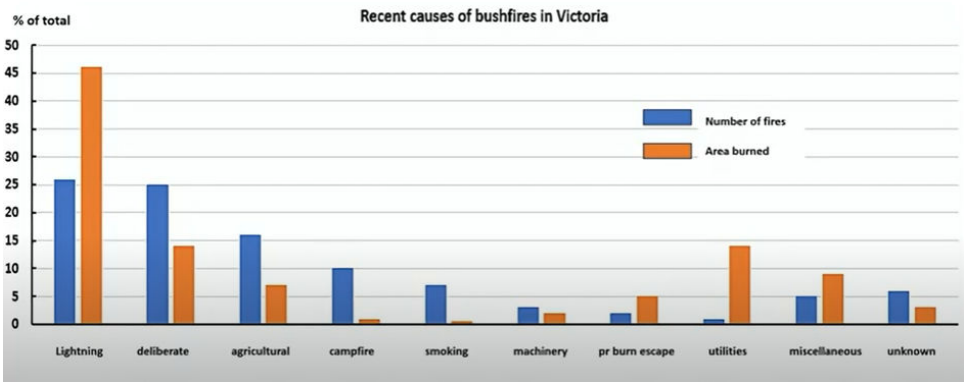

Figure 27. Analysis showing recent causes of bushfires by (Dr Michael Feller, 2024)

Roads and other linear infrastructure have strong effects on invasive predator activity within intact landscapes [88]. It is well known that tracks into natural areas facilitate predators such as feral cat *(Felis catus)* and the Red Fox *(Vulpes vulpes)* entering further into natural areas, giving more direct access to areas where predators do not usually hunt. This allows predators to penetrate further into the range of species such as Long Nosed Potoroo, bandicoot species and small reptiles that may be more sensitive to predation than prey species in the predator's regular habitat [89]

The continued management of an extensive road and track system take resources away from popular and useful roads and tracks and is leading them to become washed out and rutted beyond use by most forest visitors.

The growing trend of social media driven exploits of using heavily modified vehicles and overly large and chunky tryers is seeing public roads and tracks degraded quicker, increasing erosion of tracks and increasing the instances of vehicles leaving legitimate tracks into natural areas, increasing fragmentation and erosion

There are thousands of kilometres of tracks in state forest, many established for logging purposes, which is no longer required. Rarely when new tracks are established are old tracks removed. They are

[86] DSE Submissions 168C to Environment and Natural Resources Committee, Parliament of Victoria
[87] Fire Management for Multiple Forest Values, Dr. Michael Feller. Royal Society of Victoria, he Future of Victoria's Native Forests: A Public Symposium https://www.youtube.com/watch?v=xEWonPr7gUo&t=1219s
[88] Raiter, K.G., Hobbs, R., Possingham Hugh, P., Valentine, L.E., Prober, S.M., 2018. Vehicle tracks are predator highways in intact landscapes. Biological Conservation
[89] James ARC. 1999. Effects of industrial development on the predator-prey relationship between wolves and caribou in Northeastern Alberta. Department of Biological Sciences. University of Alberta, Alberta

not only expensive to maintain, but also have a ecological impact. Consideration should be given to doing a complete assessment of the need for tracks in more remote or intact areas of forests, removing and rehabilitating key tracks and placing a cap on new ones. If a new track is desired and an old track less desirable, the track should at the minimum be removed and rehabilitated.

There is also a growing impact of illegal tracks created by trail bikes and mountain bikes across protected areas such as national parks, conservation reserves as well as other public land such as state forests.

These tracks do accumulate. For example, in the Greater Bendigo National Park and Bendigo Regional Park where 177km of illegal tracks for been cut into the parks resulting in the equivalent to the loss of at least 17 hectares of bushland. All in places that have been protected for their biodiversity and heritage values [90] that have been damaged and lost due to these tracks.

There are many examples across the protected areas estate such as Chiltern-Mt Pilot National Park (50km+) [91], Dandenong Ranges National Park (30km+) [92] and Great Otway National Park and Otway Forest Park (600km). [93]

There has been a trend by Parks Victoria and DEECA to legitimise and allow illegal tracks in the compromise that no more illegal tracks will be created in other areas of the parks and forests. This has been a failed management option in curtailing the number of illegal tracks being created, for example 13km of illegal tracks were legitimised by Parks Victoria in the Dandenong Ranges National Park but illegal track creation continues through sensitive areas such as rainforest, cultural sites and waterways.

The attacking of public roads and tracks by small section of the 4WD community is largely illegal and condemned by the majority of the 4WD community.

State forests are perceived as largely lawless areas due to under compliance of road rules, yet the rules are unchanged between bitumen roads, those in national parks and state forests.
There is a need to assess the track network and the damage caused by these activities and the impact on ecological processes as well as access to the public in non-modified vehicles.

VNPA also supports the roll out of the track classification scale developed between DEECA, Parks Victoria and Four Wheel Drive Victoria across all tracks on national parks and reserves and state forests and education programs for 4WDers on track care and understanding track classifications.

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[90] Bootleg bike tracks. Bendigo & District Environment Council, Convenor Jenny Shield, PARK WATCH Article June 2024. https://vnpa.org.au/bootleg-bike-tracks/
[91] Operation continues to target illegal off-road vehicle use and firewood take, Parks Victoria Friday 1 September, 2023. https://www.parks.vic.gov.au/media-releases/2023/09/01/01/34/operation-continues-to-target-illegal-off-road-vehicle-use-and-firewood-take
[92] Parks Victoria wary of unauthorised bike trails, RANGES TRADER. 08/12/2021 https://rangestrader.mailcommunity.com.au/news/2021-12-08/parks-victoria-wary-of-unauthorised-bike-trails/
[93] Dirt bike riders are being criticised for illegal tracks in Victorian bushland, but they say it's their only safe option. ABC News. Mon 21 Aug 2023. https://www.abc.net.au/news/2023-08-21/dirt-bike-riders-illegal-tracks-otways-vegetation-safety/102748828

State forests ecosystems and the wildlife that call them home are not helped by the continuation of such an expansive road network, the areas are really dying a death of a thousand tracks.
There needs to be a needs based assessment of the track network, those needed for visitation and those needed for fire and land management that can be managed as management tracks.

	Easy	Medium	Difficult	Very Difficult
Overview Description	All Wheel Drive and High Range 4WD. Novice Drivers	Mainly High range 4WD but Low range required. Some 4WD experience recommended.	Significant Low range 4WD with standard 4WD ground clearance. Should have 4WD driver training.	Low range 4WD with High ground clearance. Experienced Drivers
Advisory Sign				
Expected terrain and track conditions	Mostly unsealed roads with no obstacles and minor gradients.	Tracks with some steep and/or rocky/slippery/sandy sections. May have shallow water crossings.	Tracks with frequent steep and/or rocky/slippery/sandy sections. Possible water crossings.	Tracks with frequent very steep and/or rocky/slippery/sandy sections. May have difficult river crossings.
Vehicle suitability	All wheel Drive and High Range 4WD. Can be low clearance with single range and road tyres.	Suitable for medium clearance vehicles with dual range and all terrain or road tyres.	Suitable for medium to high clearance vehicles with dual range and all terrain tyres.	Suitable for high clearance vehicles with dual range and tyres suitable for the terrain. (Mud Terrain tyres).
Recovery Equipment			Recovery equipment required.	Winch/Recovery equipment required.

Figure 28. Trip Rating and Track Grading Classification Scale (DEECA, Parks Victoria and 4WD Victoria)

6.5 Biodiversity monitoring and citizen science

To measure the success of reforms, a centralised biodiversity monitoring system must be established, funded, and implemented. This system should involve independent scientific assessments and citizen science contributions, with publicly accessible reporting on the health of ecosystems and species.

With logging now out of the picture, we understand the Victorian Government has committed to shift its pre-existing ‘Forest Protection Survey Program’ towards a new survey program monitoring biodiversity in the face of other threats (such as fuel reduction burning and strategic fuel breaks). We seek assurance that this is the case and see this as a positive first step towards biodiversity monitoring throughout state forests, provided that the program is well-funded, surveys are scientifically independent and results transparent. We understand that the program has been moved from the Office of the Conservation Regulator into Forest Fire Management, which is of concern in terms of maintaining independence.

Importantly, biodiversity monitoring in areas subject to fuel reduction burning, strategic fuel breaks or other human interventions (e.g. so-called hazardous tree removals) should be completed well in advance of the commencement of works, so that scientifically rigorous mitigations can be established and implemented for at-risk wildlife and habitats. Monitoring should then be carried out following the

completion of works to monitor the efficacy of mitigations in the short-long term and inform adaptive management and increased protections, where required.

Figure 29. Greater Glider denning/nesting tree felled by DEECA during so-called hazardous tree removals and strategic fuel break maintenance along the border of the Noojee State Forest (WOTCH, 2024).

Ideally, the program for biodiversity monitoring and mitigations should be expanded to cover all threatening activities in state forests, including domestic firewood collection, prospecting and fossicking, tourism and infrastructure developments, stocking of trout and other damaging recreational activities. Mitigations should be developed through a scientifically robust process to determine and assess each threat to forest-dependent wildlife & habitats throughout state forest. This should involve expertise from independent scientific experts in their relevant fields. The result of this process should be a list of species/habitat-specific prescriptions to protect values from key threats, and should be adaptive in nature (e.g. processes for increased protections where necessary). A State Forest Use Code of Practice should be developed with prescriptions and protections which are clear, enforceable and regulated by an independent regulator.

Biodiversity monitoring and reporting should also be expanded to assess the impacts of ecological restoration/recovery efforts, such as the restoration of Alpine Ash forests following severe degradation

from logging. This could provide good-news stories for conservation as species richness/diversity is returned to degraded areas of forest, whilst also providing assurance that key values are not negatively impacted by, or lost during such restoration efforts. Monitoring in this space should also measure and report on the increased return of ecological services such as carbon sequestration and water catchment.

Throughout the GOTs investigation area, citizen science has and continues to play a massive role in campaigns to protect forests. For example, The Goongerah Environment Centre (GECO) and Environment East Gippsland (EEG) are local non-profit groups that have been defending the forests of east Gippsland for over 30 years. Citizen science has been a powerful tool used by these groups to protect areas from logging and other threats. The list of other non-profit groups undertaking citizen science throughout the GOTs investigation area is large, and includes the VNPA, the Fauna and Flora Research Collective (FFRC), Wildlife of the Central Highlands Inc (WOTCH), Gippsland Environment Group (GEG), Friends of Bats and Habitat Gippsland and the Victorian Forest Alliance (VFA), to name a few.

Figure 30. Critically Endangered Colquhoun Grevillea population detected and protected from logging in the Kenny State Forest by citizen scientists (WOTCH & FFRC, 2020).

The Victorian Government must maintain systems and processes for citizen scientists to contribute knowledge and findings in a robust and accurate way which can inform the management and protection of key values. A framework and adequate funding would be required to allow for a reporting system which incorporates third party information and data from citizen scientists, similarly to how 'Forest Reports' operated for the Department in the context of the timber harvesting industry. As they have in the past, citizen science records should trigger detection-based zonings and prescriptions for at-risk wildlife and habitats, and help inform the landscape-based zonings.

Ideally, the Victorian Government should harness and support the work of citizen science groups. Ideally, as has been done in the distant past, the systems and processes in place should take some of the burdensome aspects of such work off the hands of volunteers and non-profit groups. For example, a system and process which takes citizen science data and translates/uploads it to the Victorian Biodiversity Atlas (VBA), would be greatly appreciated by citizen science groups. This would also help ensure that such critical data is not lost and is withheld in Government databases to help inform management decisions in a timely way.

Currently, the Governments sole reliance on information in the VBA is highly flawed and is likely leading to ill-informed management decisions at the expense of at-risk wildlife and habitats. Records often take months between the date of lodging and approval for the VBA, which does not allow for land managers to make well-informed management decisions for biodiversity in real time. Reforms are needed to speed up and enhance the functionality of the VBA and to ensure the public processes are as user-friendly as possible. Alternatively, Government should consider other biodiversity databases for informed decision making, such as iNaturalist, Atlas of Living Australia and eBird. This would allow for a greater representation of biodiversity information in real time leading to better outcomes for conservation.

Key points: State forest ecological management issues

Restoration of failed logging coupes

- Restoration will need to be undertaken for significant areas of failed regeneration, and should be done using best available ecological approaches which use the National Standards for the Practice of Ecological Restoration in Australia as well as incorporating local indigenous knowledge.

Protecting large old trees

- Principles aimed at projecting significant trees across Victoria's public land estate. should be incorporated into relevant policy, regulation and operating procedures and planning, including the Code of Practice for Timber Production or it predecessors such as Code of Practice for State forest and its associated procedures across public and private land, planning and acknowledgement within the Joint Fuel Management Programs (JFMP), Code of Practice for

Bushfire Management on Public Land (2012) and Strategic Bushfire Management Plans and Burn Plans, and any other policies leading to a decline of large old trees

Domestic Firewood

- There is a large amount of evidence to suggest the removal of coarse woody debris such as from firewood collection from state forests is impacting threatened wildlife and habitats. The state forest areas covered by the GOTs investigation contains many forest-dependent wildlife, including threatened species, which rely on and are threatened by, the removal of course woody debris and the ecological functions which they provide.
- If domestic firewood collection is to be permitted in areas of the GOTs investigation area, there is a need for enhanced planning, monitoring, education and regulation by DEECA.
- Throughout the GOTs investigation area, the issue of illegal firewood take is occurring widespread. This threatens the safety of recreational forest users and tourists, whilst also destroying key natural and cultural values, including threatened species populations and habitats
- More enforcement officers monitoring our forests (both actively and remotely), and greater penalties for non-compliance. Enforcement resources could be prioritised in accordance with a zoning system, to protect areas of key natural, cultural and recreational significance from impacts.
- Establishment of firewood lots ideally mixed species should be encouraged by government on private land to transition firewood collection out of public forests.
- The government should assess the opportunity for community firewood lots, on already cleared public land.
- Consideration should also be considered for appropriate pricing and permitting of firewood from state forest to reduce the illegal take for designated domestic fire areas

Reducing the impact of roads and tracks

- The continued management of an extensive road and track system take resources away from popular and useful roads and tracks and is leading them to become washed out and rutted beyond use by most forest visitors. There are thousands of kilometers of tracks in state forest, many established for logging purposes, which is no longer required. Rarely when new tracks are established are old tracks removed. There need to be overhaul of track management in state forest including:
    - Statewide assessment of the impacts of recreational activities on ecological functions, wildlife welfare and river and stream health.
    - A needs based assessment of the track network, which ones are need, which can be rehabilitated which can be made management tracks that allow low impact recreation such as walking, mountain bike rising, horse rising
    - Greater numbers of Rangers and OCR officers on the ground to conduct greater compliance and education on road rules across national parks and reserves and state forests

- Point of purchase education of 4WD owners as to their legal obligations and track classification scale
- An assessment framework to understand which vehicle users legitimately need large and chunky (Muddys, 36 inch +) or an extra charge to pay for track maintenance needed after use by these tryers
- Illegally created tracks for 4WDs, trail bikes and mountain bikes must not be legalised. New tracks must go through a legitimate planning process

Biodiversity monitoring and citizen science

- Biodiversity monitoring is critical to understanding the health of state forests and throughout the GOTs investigation area, citizen science has and continues to play a massive role in in protecting forests, but this needs to be supported including:
    - Reform is needed to establish, fund and implement a centralised biodiversity monitoring and reporting program which is transparent and scientifically independent.
    - The program should be expanded to monitor and report on biodiversity in the face of all threatening activities in state forests (including fire management and recreational activities).
    - The program should monitor and report on the response of biodiversity and ecosystem services (e.g. carbon & water sequestration) to ecological restoration efforts in degraded forests.
    - Importantly, biodiversity monitoring should be undertaken pre and post threatening processes, so that scientifically rigorous mitigations can be established, implemented, assessed and adapted for at-risk wildlife and habitats.
    - Mitigations should be developed through a scientifically robust process to determine and assess each threat to forest-dependent wildlife & habitats throughout state forest.
    - Prescriptions and protections should be clear, enforceable, adaptive and regulated by an independent regulator, and should include landscape-scale and detection-based zonings.
    - Systems and processes should be established and managed to incorporate data from citizen scientists to inform management and trigger ecological protections.
    - Informed decision-making for biodiversity and conservation outcomes should be enhanced through reforms that speed up functionality of the VBA, or alternatively, Government should consider information from other databases with equal weight.