



Drone imagery of logging on Mt Horsfall

SUBMISSION TO

Submission to application 02850 native forest logging operation at Mount Horsfall

28 October 2025

Victorian National Parks Association

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Victorian National Parks Association (VNPA) is Victoria's leading nature conservation organisation. We are an independent, non-profit, membership-based group, which exists to support better protection and management of Victoria's biodiversity and natural heritage.

We aim to achieve our vision by facilitating strategic campaigns and education programs, developing policies, undertaking hands-on conservation work, and by running bushwalking and outdoor activity programs which promote the care and enjoyment of Victoria's natural environment.

Summary

We believe this is the first native forest logging operation to go before the Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) in Victoria. This site has been of great public interest and debate.^{1 2}

The logging of Mount Horsfall will cause a significant impact on Matters of National Environmental Significance (MNES) including the Leadbeater's Possum and Southern Greater Glider.

Recent land clearing operations by Forest Fire Management Victoria (FFMV) as part of their Strategic Fuel Break program as have removed hundreds of large and hollow bearing trees in the region, including felling of tree with Southern Greater Glider within them resulting in the known death of one Southern Greater Glider.

The impact of the 2019-20 bushfires has resulted in the decline in Southern Greater Glider.

Since the ending of native forest logging on public land due to increasingly severe bushfires, prolonged legal action and court decisions³ showing a culture of ecological and animal welfare failures by the native forest logging industry.

Studies have shown a failure to regenerate large swathes of native forest following forestry/logging practices of forests logged between 1980 to 2019 that has resulted in

¹ Woodchips from endangered possum habitat sold to Domino's for woodfired pizza. ABC news (2025) <https://www.abc.net.au/news/2025-06-26/sawmill-investigated-illegal-logging-state-forest-possum-habitat/105458952>

² Why native forest harvesting is the 'zombie' industry that won't die. The Age (2024) <https://www.theage.com.au/environment/conservation/why-native-forest-harvesting-is-the-zombie-industry-that-won-t-die-20240909-p5k8y2.html>

³ Media Release. Delivering Certainty For Timber Workers (2023) <https://www.premier.vic.gov.au/delivering-certainty-timber-workers>

19.2% or 8,000ha⁴ not being regrown. Other studies have suggested almost 50% of Mountain Ash (*Euc.regnans*) forest that were logged have not been regrown following logging⁵.

We note that the area has already been partially logged since 2023 prior to be referring to the EPBC Act including possible logging into private land including a Leadbeater's Possum Special Protection Zone (SPZ).

Intensification of logging practices on site

As shown on p30 (Att A-Planning Permit PLA0179-19-3.1.1 Current Property Management) "Timber harvesting by the present owners commenced in 1973 and proceeded over a period of 15 years with the size of annual coupes averaging 8-10 hectares per year" and "trees were harvested over a period of 15 years from 1973 to 1988" as shown in Table 4: Coupe-based timber areas to be removed (from NVIM summary) shows the intensification of forestry practices on the site have been and will be greater than past operations including the intensification is shown via the increase in size of coupes, the plan to remove 104ha of native vegetation of the 128ha on the site and the use of harvesting type method "Clear Fell"

Map provided on page 41 or page 35 of document named Figure 4: Existing Vegetation by Plot is not colourised and does not provide suitable information for clear interpretation

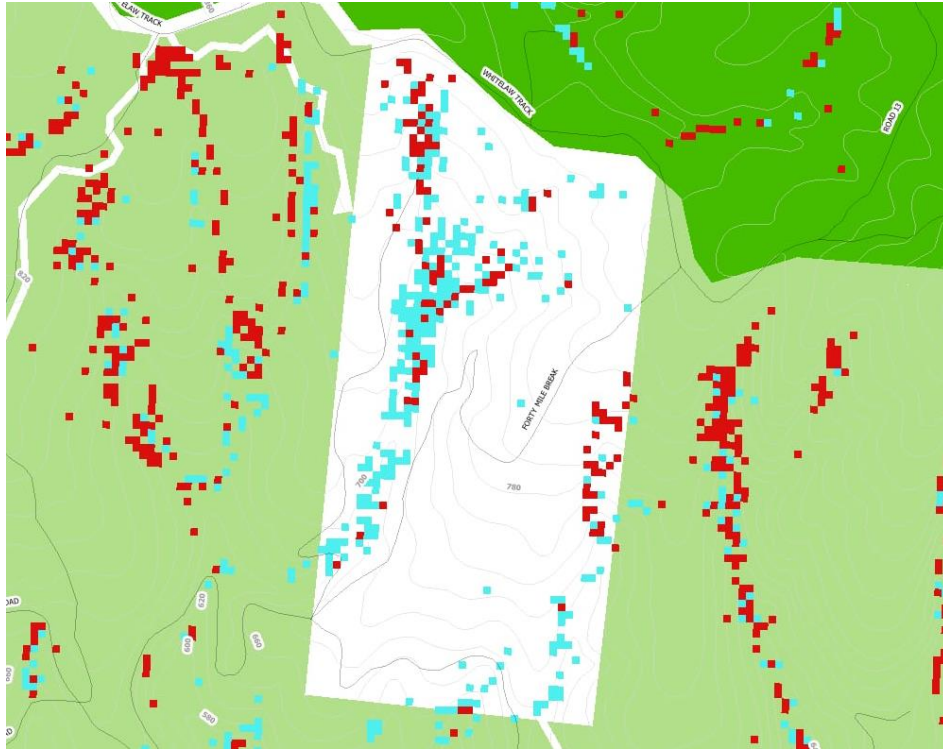
Claim of being "almost completely planted with Mountain Ash (*Euc.regnans*) tree presently of the age 30 years to 45 years" is unfounded and should be rejected due to the existing large and old trees on the site with suitable hollows for species such as Leadbeater's Possum and Greater Glider that can be observed from viewing the site from the roadside.

Of great concerns is the proponent's complete failure to mention the existence of the Mixed Forest a stage of Cool Temperate Rainforest and Cool Temperate Rainforest also found within the property as shown in the map below using data from Trouve et.al (2023)

⁴ Chris Taylor, Maldwyn J. Evans, David Lindenmayer, A significant increase in forest regeneration failure following logging is driven by climatic and management factors, Journal of Environmental Management, Volume 381, 2025, 125169, ISSN 0301-4797, <https://doi.org/10.1016/j.jenvman.2025.125169>.

(<https://www.sciencedirect.com/science/article/pii/S0301479725011454>)

⁵ Margaret Blakers, After the Logging: Failing to regrow Victoria's Native Forests (2021) https://vnpa.org.au/wp-content/uploads/2021/11/AfterTheLogging_Nov2021.pdf



Map 1. Map of Mount Horsfall native forest coupes.
Red is Cool Temperate Rainforest. Blue is Mixed Forest⁶

It was also observed prior to logging occurring on the site that an internal logging roads were maintained at all or used to manage property for forestry or farming purposes. As well as any bushfire buffer zones were not observed to have been managed. We believe the proponent should show stronger links to existing use such as receipts for work such as roading and slashing of fire breaks, thinning works etc.

Survey methods inadequate

Work from 2014 through the Victorian State Government's Leadbeater's Possum Advisory Group shows that logging on private land was a concern for the Leadbeater's Possum⁷ including the need for surveying in private land for Leadbeater's Possum. This doesn't seem to be recognised at all by the proponent.

⁶ Trouvé, R.; Jiang, R.; Fedrigo, M.; White, M.D.; Kasel, S.; Baker, P.J.; Nitschke, C.R. Combining Environmental, Multispectral, and LiDAR Data Improves Forest Type Classification: A Case Study on Mapping Cool Temperate Rainforests and Mixed Forests. *Remote Sens.* 2023, 15, 60. <https://doi.org/10.3390/rs15010060>

⁷ Leadbeater's Possum Recommendations: Report to the Minister for Environment and Climate Change and the Minister for Agriculture and Food Security. Leadbeater's Possum Advisory Group (2014) https://www.wildlife.vic.gov.au/_data/assets/pdf_file/0023/46445/Leadbeaters-Possum-Advisory-Group-Recommendations-Report.pdf

Reference to Leadbeater's Possum survey work by VicForests (now DEECA) looked to have been a survey for habitat type not the actual species. VicForests was known for low quality survey work

Surveys by Wildlife Unlimited Pty Ltd in 2018 as presented in Att J-Survey of Mount Horsfall Property for Leadbeater's Possum Habitat Zone 1A and 1B were of very low quality with only six (6) hours spent on site inspecting trees for hollows. Despite the low quality of the report the Result and Considerations stated that "it is quite possible that Leadbeater's Possum could be present" and that the lack of detection of hollow bearing trees should not be used as an indication of LBP being present on the site with the report stating "This by no means indicated that Leadbeater's Possum are absent".

There is a need to undertake further survey work for the species which the proponent did not do prior to logging the property than referring to the Commonwealth.

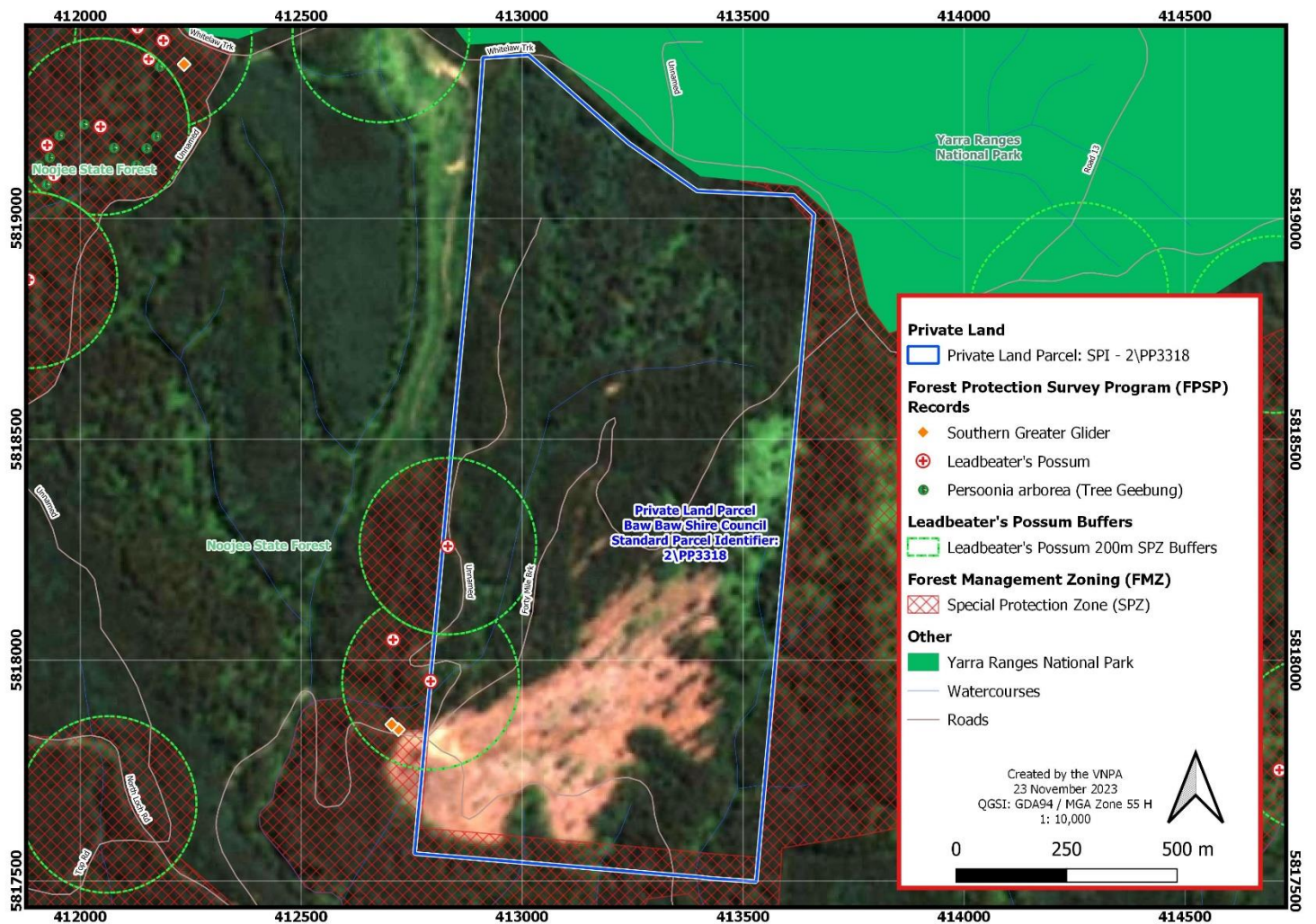
There seems to be no survey work for other Matter of National Environmental Significance found in and around such as Pilotbird (*Pycnoptilus floccosus*), Grey Headed Flying Fox (*Pteropus poliocephalus*) and Southern Brown Bandicoot (*Isodon obesulus*) to name but a few of the MNES found in and around the coupe.

Intrusions into public land and Leadbeater's Possum Special Protection Zone

As shown in Map 2 below using the spatial data available from the State government it appears that the proponent has logged outside of private property into public land, including within a Leadbeater's Possum Special Protection Area that has been on the public record and State Government data since 2019.

From our desktop analysis we estimate that 1 ha of Public State Forest zoned as Special Protection Zone for Leadbeater's Possum has been clearfelled by Private Landholders, 0.5 ha of that clearfelling is within a 200m Leadbeater's Possum Buffer (State Gov confirmed colony from 2019) and an additional 2.2 ha has been clearfelled within 200m of the LBP record on private land. This clearfelling is also within 20m of Southern

Greater Glider records from DEECA (2018). We believe the log Landing area and possible storage of logging machinery and equipment on public land is within the SPZ.



Map 2. Map of alleged illegal logging of Public Land and Leadbeater's Possum SPZ using State gov spatial data

During the Assurance Services International audit of logging at Mount Horsfall the auditor determined that⁸:

"When overlapped with a recent harvest, the boundaries provided by the CH (Certificate Holder) ... show that, if those boundaries had been correct ... the CH would have harvested outside of its FMU, without adequate legal authorisations to do so since this area would be considered state forest..."

According to the CH, discussions are under way to clarify the boundary...

⁸ ASI Final Assessment Report. FSC FM/COC Compliance assessment of Soil Association Certification Limited at Forest Strategy Pty Ltd, Australia, 2025. <https://www.asi-assurance.org/ASIAssessmentDetail?number=A-20241248887>

Considering the impact this situation generated (potential illegal harvesting), this should have been raised as a major NC (non-conformity) by the CAB"

Impact on critical habitat for Leadbeater's Possum

As highlighted in the National Recovery Plan for Leadbeater's possum (2024) the Toorongo plateaus close to the Mount Horsfall site as an area critical to the survival of the Leadbeater's Possum⁹.

Leadbeater's Possum was found to be *"high or significant risk as a result of forestry operations, mainly associated with loss of hollow-bearing trees, habitat loss and fragmentation, direct mortality, loss of feed source or sedimentation effects"* through the *Threatened Species and Communities Risk Assessment Victoria's Regional Forest Agreements* (October 2020)¹⁰.

Non-conformity with Forest Stewardship Standard (FSC) Australia certification for logging at Mount Horsfall

During 2025 the logging operations at Mount Horsfall were assessed by Assurance Services International (ASI) due to alleged non-compliance with the FSC Australia certification the site held.

The findings of this assessment found two areas of non-conformity including 1 major non-conformity. We have attached the assessment findings to our submission for your consideration. See [here](#)

As highlighted in our evidence we believe the Mt Horsfall Timber Harvest, EPBC Number: 2025/10311 must be referred for assessment under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) due to the Significant Impact it will have on Matters of National Environmental Significance (MNES) found within the site and in the surrounding landscape including the neighbouring Yarra Ranges National Park.

Thank you,

Jordan Crook

Parks and Nature Campaigner, Victorian National Parks Association

⁹ National Recovery Plan for Leadbeater's Possum (*Gymnobelideus leadbeateri*). Commonwealth of Australia 2024

¹⁰ Threatened Species and Communities Risk Assessment Victoria's Regional Forest Agreements (October 2020). Victorian Department of Environment, Land, Water and Planning https://www.environment.vic.gov.au/data/assets/pdf_file/0040/499936/Threatened-species-and-communities-risk-assessment.pdf