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CENTRAL WEST INVESTIGATION Draft Proposals

Attached is a submission from the Victorian Division of the Institute of Foresters of Australia.

Yours sincerely

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The Institute of Foresters of Australia (IFA) is the professional body representing around 900 members who are forest scientists and/or managers operating in all aspects of forest and natural resource management, including forest conservation, throughout Australia. Foresters, informed by the science of natural resource management, play a crucial role in shaping the future of forests. We advocate balanced land use that meets society's needs for sustainable forest management, timber supply, and conservation outcomes.

SUBMISSION TO
THE VICTORIAN ENVIRONMENTAL ASSESSMENT
COUNCIL'S
CENTRAL WEST INVESTIGATION
DRAFT PROPOSALS

by

The Institute of Foresters of Australia
(Victorian Division)

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Summary

The Institute of Foresters of Australia (IFA) is an independent, national body representing around 900 forest scientists, practitioners and managers with professional and practical expertise in forest and fire management, including flora and fauna conservation. Many of our Victorian members are or have been closely involved with the management of forests in the Central-West study area.

The IFA is seriously concerned that the VEAC investigation and draft proposals have:

- Not explained why there is a need (in terms of vegetation health) to change the current mix of public land tenures, particularly given its admissions that State forests are often already in good condition under these tenures (ie. in the Wombat and Wellsford blocks);
- Not shown how its proposed change from the current mix of public land tenures to a much greater emphasis on conservation reserve tenures will actually do anything to overcome perceived threats, particularly climate change and unnatural fire regimes which transcend land tenure boundaries;
- Placed unwarranted emphasis on the use of EVCs to justify placing large areas of forest in so-called ‘protected’ areas.
- Ignored VEAC’s statutory requirement to develop proposals that meaningfully incorporate the concept of ‘ecologically sustainable development’ – which is defined in the relevant legislation as being integral to community well-being;
- Failed to quantify the socio-economic consequences of proposed changes to public land tenure prior to the public consultation phase. That this information apparently won’t be available until after the public consultation phase has ended demonstrates contempt for stakeholders;
- Grossly over-stated supposed community support for over-turning the current mix of public land tenures which is an insult to the affected rural communities and groups who have registered their opposition to it; and
- Promoted the ‘dumbing-down’ of the national park concept, a process that unfortunately has been going on in Victoria for many years

Sadly, the Draft Proposals for the Central West forests adds fuel to long-standing concerns that VEAC is no longer an agency that “*provides independent and strategic advice relating to the protection and sustainable management of Victoria’s environment and natural resources*”. The IFA submits, however, from our collective wealth of experience in forest management, that most of the VEAC recommendations are unwarranted because many or most environmental threats require active management and will not be mitigated by such a simplistic action as changing the land tenure.

Introduction

The Institute of Foresters of Australia (IFA)

The Institute of Foresters of Australia (IFA), with over 900 members, is the professional association representing Australian forest scientists and practitioners. It was formed in 1935, has active Divisions in all Australian states and the ACT, and is governed by an elected voluntary Board. A requirement of IFA professional level membership is tertiary qualifications in forest science or a closely related scientific discipline; or alternatively, extensive relevant practical experience in forest management or forest science. In view of the training and experience of its members, the IFA deserves to be considered as the peak body concerned with Australian forest and woodland management.

Members are employed in a wide variety of positions including native forest, plantation and park or reserve management, research, bushfire management, land care, education, public service administration, private forestry, and in associated wood-based industries. We recognise that native forests have many values and our profession has endeavoured to balance society's needs for goods and services with good conservation outcomes. In Victoria, foresters have carried the serious responsibility for managing most of Victoria's public forests for over 100 years.

This submission

This submission comprises:

- an overview of general comments in response to VEAC's Central-West Investigation Draft Proposals Paper and the processes and philosophies that have informed it; and
- specific area-based comments arising from the Draft Proposals.

If required, this written submission can be supported by a verbal presentation to VEAC. Accordingly, the Institute would be pleased to respond to any questions that this submission may raise.

General comments on the draft proposals

Lack of any significant imperative to overturn the current mix of public land tenures

A major weakness of VEAC's Draft Proposals for the Central West forests is the failure to provide evidence of why the current public land tenures and associated land management regimes now need to be almost fully overturned. While VEAC cites climate change and

unnatural fire regimes as reasons for ‘protecting’ greater areas of the forests, **there is no explanation of how simply changing the land tenure can offer any real protection against such threats which occur irrespective of land tenure.**

Table 1 shows the magnitude of the public land tenure changes in the Central West Forests being advocated by VEAC’s Draft Proposals.

Table 1: Changes to Central West public land tenure being proposed by VEAC

Category	Current area (ha)	Area, if VEAC’s Draft Proposals are accepted (ha)	Change
State Forests	87,579 ha (56%)	10,181 ha (7%)	Decrease x 8.6
National/State Parks	22,968 ha (15%)	72,833 ha* (47%)	Increase x 3
Regional Parks	5,265 ha (3%)	23,555 ha (15%)	Increase x 5
Conservation Park	0 ha	5,246 ha (3%)	Large increase
Nature Reserves	6,258 ha (4%)	11,193 ha (7%)	Increase x 1.8
Other reserves	33,979 ha	33,091 ha	Little change
Other tenures			
Total	156,049 ha	156,049 ha	

Notes: VEAC’s Draft Proposals combine all the existing National Parks and State Parks into one National Park category

Other reserves/Other tenures include bushland reserves, water supply catchments, road reserves, utilities and leased plantations. More than half of this area can be considered as informal conservation reserves.

Overall, VEAC is proposing a **massive decrease** in the area of (multiple-use) State forest from the current 56% to just 7% of Central West Study Area, compared with a **more than a tripling** of the area of tenures being passively managed for conservation (22% to 72%). State forests, however, are the public land tenure which arguably contributes the most to overall community benefit and well-being by allowing the full suite of recreational and public uses.

Dubious justifications for such major change

As alluded to above, VEAC’s Draft Proposals provide only highly dubious justifications for hugely increasing the proportion of the Central West public forests that is contained in park and reserve tenures. These include:

- supposed community support for creating more parks and other conservation reserves;
- unwarranted concerns about the vulnerability of State forests to timber harvesting;
- supposed ‘protection’ of the forests from climate change and unnatural fire; and
- a disturbing reliance on historical Ecological Vegetation Classes to determine required levels of supposed environmental ‘protection’.

Supposed community support for more park reservations

In our earlier submission we questioned the extent of public support for further national park reservations amongst the communities adjoining the public lands being investigated. Since then

we have become aware of two separate assessments of the 640 submissions received in response to release of VEAC's Notice of Investigation in August 2017. These assessments by Loris Duclos and the United Bush Users Group **strongly contradict claims** made in VEAC's Draft Proposals Paper's about favourable community sentiment towards the prospect of declaring more parks and conservation reserves.

We are also aware that there are individuals and groups campaigning for more national parks and reserves, but contend that there is considerable doubt about the degree to which they are representative of the communities that live in close proximity to the three study areas.

Accordingly, we are disappointed that VEAC seems to have given the opinions of such groups unwarranted weighting when formulating its Draft Proposals. In so doing, VEAC appears to be misrepresenting their proportional influence given that the majority of submissions on the VEAC website are opposed to overturning the current mix of public land tenures in order to declare more forested parks and reserves.

Unwarranted concerns about the vulnerability of State forests to timber harvesting

This and previous VEAC investigations seem to be based on misconceptions about the vulnerability of State forests to various human uses, particularly timber harvesting.

Map C of VEAC's Draft Proposals Paper shows the State forest management zoning currently in place. Except for the Wellsford block, large proportions of the State forests in the Study Area are already contained in Special Protection Zones (SPZ) where human uses, including timber production, are prohibited, or Special Management Zones (SMZ) where such uses are very restricted.

In fact, 28,000 ha (65%) of the 43,000 ha of the Wombat State Forest is already contained in SPZs and SMZs, and close to a majority of the forests in the Pyrenees and Mount Cole areas are also already heavily zoned SMZ and SPZ. Under the current Regional Forest Agreement, SPZs are included in the CAR system and hence the EVCs contained within SPZs should be included in the areas considered protected.

Accordingly, **timber harvesting is currently only permitted in a minor portion of State forest land, with the balance managed for conservation, soil erosion and water supply purposes.** Even where timber harvesting is permitted, there are strict environmental controls in place – see the Code of Practice for Timber Production (2014) and associated DELWP management prescriptions – designed to ensure that conservation values are protected and maintained. As an example of the minimal impact of timber harvesting and slash burning on understorey vegetation, see Loyn *et al* (1983). Yet, **contrary to this reality of very limited timber harvesting, VEAC's Draft Proposals Paper creates a false impression to the casual reader that all State forests are subject to 'destructive clear-felling' and nothing but park reservation will save them from this fate.**

While VEAC has identified significant numbers of ‘threatened’ species of flora and fauna in the studied forests, the apparent ‘threats’ are rarely documented. In many cases, we suggest that many ‘threatened’ species are just rare or uncommon - and are in fact not ‘threatened’ by any human use. As described on p.95 of VEAC’s Draft Proposals Paper regarding the Ben Major Grevillea, plant species populations are almost invariably more affected by biotic and edaphic factors, including fire frequency, than timber getting.

Despite this admission, VEAC often infers that ‘logging’ is deleterious to the survival of plant species and vegetation communities without providing any proof. This has led to VEAC recommending cessation of most timber harvesting based on an unproven premise that it significantly damages flora and fauna. **This illustrates a fundamental flaw in the approach taken by VEAC in determining future land use.**

Given the above, and the fact that so-called threatened species and vegetation communities have survived quite successfully, and even flourished, under contemporary State forest management, it belies common sense that VEAC should propose that the majority of State forest containing such flora should be turned into limited use national parks and conservation reserves.

For example, although the Wombat State Forest has been harvested at different intensities over the past 120-150 years, it is still a productive and valued forest for many uses and activities. That is, the timber utilisation has clearly **not** led to any significant diminution of its values, given that VEAC is now proposing to make it into a national park and regional parks.

Supposed ‘protection’ from climate change and unnatural fire

While VEAC’s unreferenced claim that average annual rainfall has decreased by 100-200 mm in the Study Area is could be debated, **the Draft Proposals Paper does not explain how simply placing more forests into park or conservation reserve tenures will lead to any improvement in the forests’ resilience to climate change.** Indeed, by reducing management flexibility, VEAC’s Draft Proposals, if implemented, would reduce the tools, such as thinning, that could be used to make the forests more resilient.

Well-managed thinning can provide the following benefits:

- *Better survival of the retained trees in dry conditions, as there is less between-tree competition for moisture;*
- *Increased streamflow due to lower transpiration from the reduced canopy, which would be of value in drier periods (whether from climate change or not); and*
- *Reduced risk of severe damage should a bushfire burn through previously thinned areas.*

In past investigations, the ECC/VEAC has endorsed ecological thinning but we have seen **very little** of this type of active vegetation management actually carried out, as Parks Victoria appears very reluctant to engage in any sort of tree felling. We suggest that parts of all the forests in the Study Area could benefit from careful thinning, whether for commercial or domestic firewood, or just to promote the better health and growth of the remaining trees.

We are very concerned that the Proposals Paper does not properly acknowledge bushfire as a major factor in land management. **It is clear that unnatural fire already poses arguably the greatest threat to Australian forest ecology alongside feral pest plants and animals.** However, fire is a threat that transcends land tenure boundaries and so using it as a justification for proposals to significantly change the current mix of public land tenures is hardly logical.

Indeed, if other parts of Victoria and Australia are a guide, **the bushfire damage threat is exacerbated by shifting to passive conservation management** by creating more national and regional parks that are typically accompanied by a reduction in public land access to due closed or unmaintained tracks and stream crossings. In addition, an increasingly constrained ability to undertake fuel reduction burning is another reason why VEAC (not to mention the wider rural community) should be very concerned about creating more forested area under the control of Parks Victoria.

A disturbing reliance on historical Ecological Vegetation Classes (EVCs) to determine supposedly required levels of land ‘protection’

Relying on EVCs to guide decisions about public land tenure and use is highly speculative because:

- it is unlikely that the EVCs delineated today accurately reflect vegetation type and occurrence pre-1750 as is being claimed, due to human disturbance (ie. introduced weeds and browsing animals such as rabbits) and largely changed fire regimes;
- EVCs can be highly dynamic, varying seasonally in response to events such as drought;
- EVCs are often delineated to such a fine level of detail that they may be separated by very minor differences and thus become essentially meaningless; and
- delineating unnecessarily large numbers of EVCs almost guarantees greater than is warranted need for ‘protection’ (ie. increase in national park and reserve tenures).

Using this very detailed EVC approach (using 107 EVCs) it is clear that VEAC **primarily focusses on only one value of public lands – biodiversity conservation.** After satisfying this by declaring more national parks and reserves, all other community and commercial values become restricted to what is left over – invariably a proportionally small area of remnant State forest. (Interestingly there does not appear to be any consideration of the potential to reduce the area of EVC’s contained in parks and reserves where they are currently **over**-represented.)

While this conservation-first approach presumably reflects the ecological perspectives which appear to dominate VEAC’s philosophy, it is hardly appropriate for an independent government agency with a responsibility to seriously consider the broad range of other factors and issues as set out in its Terms of Reference for this investigation.

Capability of VEAC to conduct such an investigation

Given that this VEAC study is totally focussed on native State forests, the IFA is concerned that the Council's membership does not include a person with high level knowledge and direct experience in the management of such forests. We note that our earlier offer (in April 2018) to recommend such a person, in accordance with the VEAC Act (Part 8, Clause 4) was rejected by the Minister.

The IFA is also concerned that the VEAC staff may have been over-influenced by certain conservation groups, as the Draft Proposals are **remarkably** in line with the position advocated by groups such as the Victorian National Parks Association and the Wellsford Forest Conservation Alliance. In contrast, the views and arguments put forward by groups that are supportive of continued multiple-use forest management appear to have been largely ignored.

We have also been advised that the Community Reference Group (CRG) had little input to the Draft Proposals and that, rather than being meaningfully consulted, its members were simply informed of procedures and plans after they had been devised by VEAC. This contravenes expectations that interest groups, through their representation on the CRG, would have an opportunity to shape the draft proposals..

Concern that VEAC is not meeting its regulatory requirements

According to its Terms of Reference (TOR), the purpose of VEAC's Central West Forests Investigation (p.13) is to:

- “(a) identify and evaluate the condition, natural and biodiversity values and cultural, social and economic values and the current uses of public land in the specified area; and
- (b) make recommendations for the balanced use and appropriate management arrangements to conserve and enhance the natural and cultural values.

Page 14 notes that VEAC must also have regard to 8 considerations which are listed in Section 18 of the *VEAC Act 2001*. The IFA believes that VEAC has not adequately considered 3 of these as follows:

- **the principles of ecologically sustainable development;**
- **the potential environmental, social and economic consequences of implementing the proposed recommendations;**
- **any existing or proposed use of the environment or natural resources.**

Failure to meet the mandatory requirement for ‘ecologically sustainable development’ and ‘balanced use’

While VEAC's Draft Proposals Paper acknowledges VEAC's requirement to take account of the principles of ‘**ecologically sustainable development**’ it does not define what this concept is. This makes it difficult for interested parties to make a judgement on whether or not VEAC has fulfilled this requirement.

In fact, the concept of ‘ecologically sustainable development’ is defined in Part 1, Section 4 of the later *Commissioner for Environmental Sustainability Act 2003* (Act No. 15/2003) – [Note: *Bolding and underlining has been added by us for emphasis*]:

1. ***Ecologically sustainable development is development that improves the total quality of life, both now and in the future, in a way that maintains ecological processes on which life depends.***
2. ***The objectives of ecologically sustainable development are –***
 - (a) *to enhance individual and community well-being and welfare by following a path of economic development that safeguards the welfare of future generations;*
 - (b) *to provide for equity within and between generations;*
 - (c) *to protect biological diversity and maintain essential ecological processes and life support systems.*
3. ***The following are considered as guiding principles of ecologically sustainable development –***
 - a. *that decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equity considerations;*
 - b. *if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation;*
 - c. *the need to consider the global dimension of environmental impacts of actions and policies;*
 - d. *the need to develop a strong, growing and diversified economy which can enhance the capacity for environmental protection;*
 - e. *the need to maintain and enhance international competitiveness in an environmentally sound manner;*
 - f. *the need to adopt cost-effective and flexible policy instruments such as improved valuation, pricing and incentive mechanisms;*
 - g. *the need to facilitate community involvement in decisions and actions on issues that affect the community.*

From this definition, **it is clear that ‘ecologically sustainable development (ESD)’ is a concept which strongly integrates the conservation of biodiversity with economic development and community well-being and welfare.** However, in stark contrast, VEAC’s Draft Proposals eliminate some economic use and substantially reduce opportunities for other passive human use that significantly contributes to the well-being of local communities, while giving an overwhelmingly unbalanced weighting to environmental preservation. This does not fit at all well with the objectives and guiding principles of ESD outlined above (particularly objective 2(a) and guiding principles 3(a) and 3(d)).

In fact, we would argue that the ESD concept is being met far more effectively in the existing balance of public land tenures stemming from the earlier work of VEAC’s predecessors, the Land Conservation Council (LCC) in the 1970s and 80s, and that of the Environment Conservation Council (ECC) which was completed only 17 years ago.

The IFA believes that VEAC’s draft proposals for the Central West forests which severely curtail recreational pursuits, community services, and resource use in order to substantially expand the area of public land devoted to biodiversity conservation, **contravenes** the Act’s

specific requirement to meaningfully take account of the concept of ‘ecologically sustainable development’.

In relation to ‘balanced land use’, Table 1 clearly shows that there is no balance between areas of different land tenures. Thus VEAC has not followed (b) of the stated purpose of the investigation.

Concern that the national parks concept is being devalued

VEAC’s Draft Proposals continue the Australia-wide ‘dumbing down’ of the national parks concept whereby, over the last 15-20 years, large areas of limited national or even state significance are being declared as national parks primarily in response to political imperatives driven by environmental activism determined to end natural resource uses and guarantee that they can never return.

Only areas of land that have real national significance are meant to be eligible for national park status. At its 10th General Assembly in New Delhi in 1969, the International Union for the Conservation of Nature (IUCN) recommended that areas declared as a National park should be relatively large with *“one or several ecosystems not materially altered by human exploitation and occupation, where plant and animal species, geomorphological sites and habitats are of special scientific, educational, and recreational interest or which contain a natural landscape of great beauty.”*²¹

Many of the forested National parks declared in Australia over the past 20-years would struggle to meet such a definition either due to extensive human use that was occurring right up to the time of their declaration, or due to an absence of sufficiently significant features. Most areas in the Central West forests, areas such as the Wombat State Forest which has been heavily exploited for wood stretching back to the pioneering era, clearly cannot meet the IUCN’s definition and yet are being proposed by VEAC as national park.

Invariably, the areas with truly significant landscapes, flora and fauna, or geomorphology had already been declared as National parks years before (eg Wilsons Promontory, Blue Mountains, Tasmanian highlands), or were contained in some lesser form of reserve category more appropriate to their level of significance. Indeed, many of the recent forested National park declarations have in-part embraced substantial areas of already existing reserves of lesser conservation status and – without sufficient justification – rebranded them to a higher status.

A good example has been the recent expansion of National parks in the extensive floodplain river red gum forests and woodlands on both the Victorian and NSW sides of the Murray River. These are amongst the most modified landscapes on the continent chiefly due to natural flooding regimes being over-turned by 80 years of river regulation for irrigated agriculture. In addition, most parts have had up to 150-years of widespread cattle grazing, selective timber harvesting, and exclusion of low intensity fire. On the Victorian side of the Murray River prior to the declaration of new parks in 2008, over two-thirds of the region’s river red gum forests and woodlands were already being primarily managed for biodiversity conservation in existing National parks, State and regional parks, nature conservation/natural features reserves, other

reserves, and State forest reserves. Following the Victorian Government's park expansion exercise, the proportion of multiple-use State forests plummeted from 43% to just 5%.ⁱⁱ

Many of the new forested National parks declared since the mid-1990s have stemmed from election-eve commitments to appease environmentally-concerned, so-called 'green' voters, and unfortunately they've been largely emblematic of a simplistic political land grab. This approach has now largely overtaken reserve recommendations based on detailed scientific considerations of natural values, impacts and needs which recognised that effective environmental protection is more complex than simply reserving more land.

An example of the latter approach, are the National Reserve System and the Regional Forest Agreement (RFA) processes of the mid to late 1990s which incorporated the need for a rationally-based comprehensive, adequate, and representative (CAR) network of conservation reserves. This was founded upon the nationally-agreed JANIS criteria developed from 1993-96 by an inter-governmental working group comprising representatives from state forestry and conservation agencies, and the CSIRO.

Specific comments on the draft proposals

Chapter 4 - General recommendations

Draft recommendation R3 (p.58) - *Assistance for adversely affected individuals and businesses*

This recommendation recognises that individual and businesses will be adversely affected by at least some of VEAC's proposals. The IFA fully agrees with this assumption, but suggests that the government would **not** need to provide compensation and assistance if the final proposals did not lead to shutting down of various current businesses and activities.

Instead of paying out significant sums of taxpayers' money, the government could, in contrast, be gaining revenue from activities that currently are based on access to the forests.

Draft recommendation R11 (p.61). *Domestic firewood access*

The IFA supports the re-introduction of a permit system for removal of firewood from crown land.

We note that most areas previously available for firewood collection - commercial and domestic- are proposed to be closed (partially or fully) in future. This is a **retrograde step**. The demand for firewood, according to local foresters, remains very high. Wood is renewable, and thus provides a greenhouse-gas friendly fuel for heating and cooking, unlike electricity and gas. It can also be a very affordable form of heating. More of it should be made available, not less.

Chapter 5 - Mount Cole - Pyrenees Block

We submit that, given the current popularity of these forests for multiple uses and values, what is wrong with the current management that would require their tenure to be significantly changed?

The IFA view

- The IFA is in strong agreement with retaining some State forest for Mt Cole, to support local industry.
- However, we maintain that the southern part of the Pyrenees Range should also remain as State forest, as it also helps to support 2 sawmills (at Chute and Talbot) and is a source of firewood.
- Most of the northern and north-eastern sections could be a Regional Park, but if a 'Pyrenees National Park' was created, that would create a mockery of the 'national park' concept - as discussed above.

Chapter 6 - Wellsford Block

Two comprehensive, independent and objective investigations into the natural, cultural and commercial values of the public land forests in the Bendigo region (by the Land Conservation Council - completed in 1981 and the Environment Conservation Council [the predecessor of VEAC] - completed in 2001) **resulted in a substantial expansion of the parks and reserves system adjacent to the City of Greater Bendigo to some 25,800 ha.** There was a concomitant major reduction in the area of (State) forest available to meet the community's requirements for wood-based products.

Both studies, including conservation and economic values, investigated the 7,100 ha Wellsford State Forest and neither considered that its intrinsic values warranted its dedication as a conservation reserve, let alone a national park. It was thus retained as State Forest (ECC 2001). **We ask, why should the VEAC consider more public forest being a park or nature reserve, when 90% of the public land in the Bendigo area already has park status?**

The 2001 recommendations, which were accepted by the Government, aimed at ensuring sufficient State forest would be available to maintain the existing Box-Ironbark sawlog industry, with at least the current level of harvesting. The Wellsford forest was also to provide opportunities for harvesting of other important wood products such as fencing and firewood. It has fulfilled that community obligation, **as well as being a place that supports healthy populations of flora and fauna.**

The style timber of timber harvesting in the forest is either thinning (mainly for firewood) or single tree selection (sawlogs, posts and firewood) (Fagg & Bassett 2015). Combined with stringent prescriptions for habitat tree retention, **this is very low impact harvesting**, which maintains a canopy cover and with all trees over 60 cm diameter retained (DSE 2008, DEPI 2013). Regeneration is assured via coppicing stumps.

It must be pointed out that thinning of regrowth forests for firewood boosts the growth of the remaining trees and thus will reduce the time taken for these trees to develop hollows and larger crowns, thereby enhancing wildlife habitat and nectar production in a shorter time-frame.

The Box-Ironbark forests, such as the Wellsford SF, produce high quality timbers with decorative grain and a range of colours that make them highly sought after for furniture, flooring, cabinet work and other moulded products, as well as lower-value (but necessary) products like fencing material and firewood. **Careful and sustainable management ensures that such valuable products can continue to be sourced into the future while ALSO**

protecting and enhancing the other values (such as honey production, trail bike riding, nature conservation, bush-walking, camping, etc) of these forests.

Currently, a small number of licensees operate in the forest, predominantly producing sawlogs. The durable, specialty timbers sourced from the Box Ironbark forests are now **only** available in the Bendigo FMA. These forests supply an annual volume of 450 m³ of grade 1 sawlog and 3,000 m³ of grade 2 sawlog **of which Wellsford makes an important contribution**. The volumes are relatively small, but important. The Wellsford State forest is the last remaining parcel of State forest in the immediate area surrounding Bendigo.

In its investigation, VEAC should have considered **all** the public conservation reserves already existing within 50 km of Bendigo, rather than just focussing on the Wellsford SF. In fact, the IFA suggests that the existing large conservation reserves in the Bendigo district **already** contain all the values sought by environmental groups.

Wind the clock back 130-160 years – almost all the Wellsford forest was flattened to supply timber during the gold rush, and parts were dug up. However, after careful and sustainable management by the Forests Commission and other subsequent agencies like DELWP and VicForests, the forest is flourishing and available (under regulation) for the values and uses listed above. As reported in the *Bendigo Weekly*, VEAC says it is “one of the biggest and in best condition Box-Ironbark forests in Victoria”. **Thus, isn’t it logical that if VEAC wants to maintain this “best condition”, the Wellsford State Forest should be kept under the current management?**

It is evident that eco-tourism/forest-based recreation is fully compatible with State forest multiple-use management that may include sawlog and/or firewood production, **and indeed, the two streams of activity have successfully co-existed for decades. Accordingly, there is no need to close one down for the other to flourish.**

The IFA view

- We accept that a small eastern portion of the State forest be added to the Mt Sugarloaf Nature Reserve. This should include the ‘large, old tree’ site, although, as we note above, this site has always been protected from timber harvesting.
- The balance of the area must be retained as State forest for the reasons outlined above.

Chapter 7 - Wombat- Macedon Block

With regard to the Wombat region, most of the forested public land is **already** primarily being managed for biodiversity conservation. See below Table 3:

Table 3. ‘Greater Wombat Forest’ tenure and use (from Poynter 2005)

Tenure and use	Management zones	Area (ha)	Proportion (%)
Conservation parks and reserves	No harvesting	24,372	34.8
Other public land	No harvesting	2,755	3.9
Wombat State Forest	Special Protection Zone (no harvesting)	11,807	16.8
	Special Management Zone (some harvesting)	16,280	23.3
	General Manag Zone (harvesting permitted)	14,850	21.2
TOTAL AREA		70,064	100.0

The adjacent Lerderderg State Park, Hepburn Regional Park and Macedon Regional Park are already in proximity to the Wombat State Forest. Is more park really needed? Flora and fauna are already well protected in the Wombat SF via the management zoning system and also in the substantial area of surrounding forest that is already reserved (see Table 3), so creating a new national park would add little extra value.

The forest's proximity to Melbourne provides for hunting, fossicking, horse riding, 4WD driving, motor bike riding and other recreational pursuits that are typically restricted in parks. The (limited) commercial forest operations in the Wombat SF guarantee the employment of specialist tree fallers, heavy machinery operators, roading crews and specialist fire-fighters with years of experience from **the Daylesford work centre of DELWP. This is a crucially important resource of equipment and expertise should the forest (and surrounding parks) be threatened by bushfire.**

While no sawlog harvesting currently allowed in this forest - **due to a political decision 13 years ago** - it contains significant quantities of valuable Messmate and Gum timber, which could potentially supply a locally-based sawmill. Following an analysis in 2013 (DEPI 2013) the Wombat State Forest was found to have the potential to sustainably supply high quality sawlogs at a harvesting rate of 170 ha/yr, which is less than 1% of the total designated productive area in the forest (~19,000 ha).

The benefits would be employment, economic activity for the Daylesford or Trentham district, and revenue for the government, not to mention production of highly desirable timber for furniture and building purposes. These benefits would be generated without compromising the conservation values of the forest as a whole, especially given that the majority of the Greater Wombat Forest exists outside of the designated productive area, and is already reserved (Table 3).

The Wombat State Forest sustains 6 commercial firewood cutting operations, varying in scale from 200 to over 1,000 cubic metres per annum. These volumes are currently taken from regrowth coupes across the forest using thinning systems. This approach improves the structure of the forest over time, allowing dominant trees to grow larger more quickly and introducing small-scale disturbance to promote greater diversity of understorey and ground species.

Any resumption of sawlog harvesting would be guided by strict environmental and silvicultural prescriptions as set out in the Code of Practice for Timber Production (DEPI 2014) and Murphy *et al* (2013).

Give that under current management as State forest, in which only 21% of the forest is effectively available for timber harvesting, leaving 79% for conservation purposes, we seriously question why VEAC needs to propose that all the forest should be 'parked'.

The IFA view

The IFA recommends that:

- All SF West of an approx. line, following the proposed E boundary of the proposed regional park to Blackwood, then along Green Hills Rd, **remains as State Forest**
- We suggest that the forest N of Ballarto proposed to be part of the new national park **be instead be made a regional park.**

Our proposal leaves open the option of a future, dare we say sustainable and carbon neutral, small industry based on the excellent eucalypt timbers that grow in the Wombat State forest. This can be done without compromising the environment - **a win-win result, for the community and the forest.**

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