

# IFA Submission to the VEAC Draft Proposals Paper - Statewide Assessment of Public Land

*Institute of Foresters of Australia (Victorian Division) - November 2016*

## **Introduction**

Our submission initially comments on 3 of the 19 draft recommendations, as set out on pp.15-21 of the Draft Proposals Paper. We then comment on 4 other related issues, some of which are raised in the VEAC Papers.

## **Draft Recommendations**

### ***R1 Land-use categories***

The Institute objects to the proposed change of *Forest park* and *Regional park* to *Recreation park*. This may be OK for Metropolitan parks but is not suitable for *Forest parks* and *Regional parks* where some low impact utilisation of resources (e.g. wood for firewood, posts, poles) is generally allowed. Use of the term *Recreation* will, in time we suggest, lead to these uses being banned to the detriment of local communities.

We also object to placing *State parks* into the *National park* category. This would upgrade State parks to something that they were never intended to be, while dumbing-down the National park category by including areas with undeserving conservation values. The State park tenure category was developed specifically for areas which did not meet the criteria required of the National park category.

### ***R2-R9 Legislative reforms***

The IFA would object to some of the proposed reforms set out in R2-R9 if the above changes in categories were to take place.

### ***R11 Land-use assessment of certain bio-regions***

This recommendation goes way beyond ToR No. 3 of this investigation, which states only *'that the council is to investigate and provide an inventory of the types of values on public land.'*

For the Central Victorian Uplands, Table 5.6 of the VEAC Discussion Paper shows that a huge area (~70,000 ha) of public land would be needed to make up a 'shortfall' to reach 17% (we would question why 15% is now not acceptable) of the 1750-extent of EVCs in this bioregion. Similarly for the Strzelecki Ranges bioregion, about 29,000 ha would be needed, and 49,000 ha for the Goldfields bioregion. State-wide the estimated total is 695,000 ha! The IFA sees this "proposal" as a potential 'land grab' for debatable reasons.

We believe that as many/most EVCs already well exceed the 17% in-reservation target, the suggestion of reserving a further 695,000 ha statewide to bring the 'under-reserved' EVCs

up to the 17% minimum standard would only be acceptable if a similar area of surplus-to-the 17% target forests in conservation reserves were returned to State forest status.

The IFA believes that VEAC is pre-empting future land-use studies that may (or may not) be requested by the Minister, and that recommendation R11 is not within the ToR and thus should be deleted.

### **R13 State forest review**

*“Review values, uses and appropriate land category for State forest where commercial harvesting of sawlogs has ceased.”*

This recommendation appears to be based on ToR No.2, although State forest where sawlog harvesting is not currently happening, in no way means that the ‘land-use’ has ceased.

It is pertinent to point out that State forests set aside for multiple uses are not akin to wood production zones, which in terms of net harvestable area, typically occupy only a portion of the State forest area.

This recommendation is based on a lack of appreciation of commercial forestry as a long-term enterprise, and that ‘commercial harvesting of sawlogs’ is not a land-use *per se*, but the use of a resource obtainable from forested land. The ‘land use’ is forestry for all the multitude of values that a State forest has, including other commercial uses (e.g. honey, posts, poles, etc), community use (e.g. domestic firewood collection), and societal value for recreational uses that are not permitted in other public land categories (e.g. feral animal hunting, horse-riding, dog walking, and free camping).

An example of such a forest is the Wombat State Forest (where commercial harvesting of sawlogs ceased in ~ 2000) but is still producing quantities of firewood for local communities, and trees are steadily growing, making them a valuable future resource of high quality sawlogs. Here, a future Government may decide that some of these sawlogs could be utilised to contribute to a ‘green’ economy. Such forests need proper management that DELWP and VicForests are currently providing, and should indisputably remain as State forest.

The IFA believes that recommendation R13 should be deleted.

### **Other comments**

#### **State Forest and Historic/Cultural features reserves**

According to the VEAC report, there are 1,295,300 ha of ‘unreserved’ forest. As at 2016 only 57% of Govt-accepted land-use recommendations regarding the need to extend reserved State forest (via the Forests Act) have been implemented. This is in marked contrast to 100% of all recommendations being implemented regarding the creation of National parks, State parks, *et al.* In relation to historic or cultural features reserves, only 40% of recommendations have been implemented.

Despite the Discussion Paper drawing attention to the above poor level of implementation of previous VEAC recommendations, there are no recommendations to address this issue regarding reservation of State forest and historic/cultural features reserves. The IFA thus suggests that VEAC includes one or more recommendations to address this important issue.

### ***Current parks that do not meet the relevant criteria***

One example is Lind National Park in East Gippsland. This park was created in 1956, well before the Land Conservation Council, came into existence, and has somehow maintained its status even though there have been two land-use reviews in East Gippsland since 1972. It is clear to most observers that Lind NP should revert to a Natural features reserve or Community use reserve or to State forest, due to its very small size (1370 ha) and limited biological value.

Other similar examples include Morwell NP (565 ha, declared in 1966) and Alfred NP (3050 ha, declared in 1956).

Re-naming of such parks, or at least an assessment of their reservation status, we believe, is well overdue and falls within ToR No. 2, **and thus a suitable recommendation should be made.**

### ***Reserves that have limited mention in the Papers***

The VEAC reports have given minimal space to several common current categories of reserved land that are managed by Parks Victoria. These include:

- Flora reserves (e.g. Cabbage Tree Creek)
- Flora and fauna reserves (e.g. Martins Creek)
- Scenic reserves (e.g. Bemm River)
- Wildlife reserves (e.g. Lake Curlip)

Although the Discussion Paper (pp.49-52) refers to some of these categories, our concern is that in terms of reclassification (Table 1 of the Draft Proposals paper) they are not mentioned. They are widely used on maps and the Parks Victoria website, so is the intention to retain these terms? We suggest that VEAC clarify this matter in their final Report.

### ***Term of Reference No. 3***

*“Undertake an inventory of the types of values on public land”*

We submit that the work and its substantial cost to taxpayers to produce the extensive 70 pages of Chapter 5 in the Discussion Paper was clearly not warranted by this very simple Term of Reference. This Chapter overshadows the main object of the overall study which is ToRs 1 and 2. (An inventory is essentially a listing, not an excuse for a detailed investigation.)

## Concluding comments

This investigation has addressed a number of administrative issues regarding classification of Crown Land in Victoria, but has gone beyond its Terms of Reference in some matters and has not addressed some other matters which the IFA has identified and explained above.

We trust that the VEAC staff and Council will take account of our concerns.

Sincerely

*Euan Ferguson AFSM*

Chairman, Institute of Foresters of Australia, Victorian Division

*The **Institute of Foresters of Australia (IFA)** is a professional body with over 1000 members. Since 1935, the IFA has represented all segments of the forestry profession, including public and private practitioners engaged in many aspects of forestry, nature conservation, resource and land management, scientific research, administration and education.*