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The Wilderness Society Victoria

Submission to the Victorian Environmental Assessment Council Statewide Assessment of Public Land - Draft Proposals Paper 2016

The Wilderness Society Victoria (TWSV) welcomes the opportunity to make a submission to the *Statewide Assessment of Public Land Draft Proposals Paper, 2016*.

Introduction

For the most part TWSV supports the recommendations in the Drafts Proposals Paper and welcomes the quite strong inclusion of climate change, an issue that was not in the forefront at the time of the *Statewide Assessment of Public Land Use* in 1988.

There is now a large body of knowledge brought together by scientists, the reviews and investigations by the Victorian Environment Assessment Council (VEAC) itself, comprehensive reports by groups such as the Victorian National Parks Association's fourth *Nature Conservation Review* and the many submissions over the years, including those by TWSV to this Investigation and to the 2011 *Remnant Native Vegetation Review*, that enable VEAC to make strong recommendations for the wellbeing of the Victorian community and natural heritage well into the future. We appreciate the simpler language, for the most part, in the proposed changes to public land use categories but have recorded our concerns that some of the name changes may reduce public understanding that the purpose of some protected areas includes nature conservation, among other objectives. We strongly support the recommendations for assessing the three regional clusters with potential for improved protected area systems and urge that the assessments be initiated soon. We support reviews of the State Forest category, urge VEAC to make a recommendation on critical climate change refugia in its final *Statewide Assessment of Public Land Report* and include climate change in future terms of reference for reviews and investigations.

Section 2.4 - Public land classification

Recommendation 1 and table 1 Proposed changes to public land use categories:

In general TWSV supports the proposed changes that make the categories clearer to the public while at the same time keeping the conservation status either the same or higher.

However, there are a number of issues we wish to raise:

- **Aboriginal Land overlay** - TWSV recognises Traditional Owners have a legitimate right to claim title over land and sea and is supportive of joint and co-management arrangements. We strongly support the general principle of greater and more formalised recognition of Traditional Owners within the tenure system, including title, management and other rights and interests. In that context, the proposal for a new Aboriginal Land overlay appears a positive development. However, we have not consulted Traditional Owners on this specific measure and would need do so before offering an unqualified perspective on the proposed arrangements.
- **Wilderness Park** - The proposal to re-categorise Wilderness Park as National Park is deeply problematic. Wilderness Park is classified as IUCN category Ib while National Park is generally classified IUCN category II. Although Wilderness Parks pre-date the investigation that resulted in Wilderness Zones, they were identified for having high value as large intact areas and a more aligned re-classification would be from Wilderness Park to Wilderness Zone.
- **Regional Park** - into proposed **Recreation Park**: the name change is concerning as, in the eyes of the public, the proposed name may detract from the nature conservation component that is part of the understanding of regional parks. Current regional parks, or parts of them, may need further study, as to whether they sit more towards the national and conservation park end or towards the recreation end of the spectrum (see p45 of the Discussion Paper Report), and be managed and signed appropriately. As there is a large variety of areas with various conservation values in the current regional park category, perhaps a term like *Community Nature Reserve* combines the aspects of nature and some appropriate recreation – or simply *Nature Reserve*. Because of the implications of the ‘made playground’ in the term ‘recreation park’, more akin to town and city parks, we consider it better not use the term ‘recreation park’ for the current regional park category.
- **Community Use Reserve** – As the simple word ‘*park*’ seems to be a well understood category, e.g. Darebin Park, Alistair Knox Park, Royal Park, and is used frequently for metropolitan and town areas perhaps there is a way to insert the word ‘community’ into the current names, for example *Alistair Knox Community Park* or *Alistair Knox Community Reserve* and the words ‘park’ or ‘reserve’ would be included so as to cover the more obviously nature conservation parts of any particular reserve. On the other hand, when there is no nature component present and for new reserves fitting this category, ‘community reserve’ would be a useful category.

- **Game Reserve** - this proposed re-classification is not supported. TWSV considers **Nature Reserve** (*with seasonal hunting*) a more appropriate name for this category of public lands. The term 'game reserve' is of concern because the nature conservation aspects, whether lake, flora or fauna conservation, could virtually disappear in the public mind with an overly simplified understanding of the term 'game reserve' as a place for the sole purpose of hunting. And this is certainly not intended in the current reserve category *Natural features Reserve – wildlife area (seasonally available for hunting)* under which a reserve such as Tower Hill, in Western Victoria, with its significant other values, is managed. The natural feature in many of the reserves is a waterbody and, as noted in the Discussion Paper, changing community expectations, for example the increasing importance placed on clean water expressed in the current opposition to coal seam gas mining in Victoria, means the term proposed 'game reserve' is too limiting and narrow a management category. This is also the case in the context of current and future climate change stresses where, to protect conservation values, changes in management may need to occur.
- **Deer** - although, perhaps, more relevant to the Discussions Paper, we consider the current status of deer, in relation to the discussion on game, also appropriate here. In the past these animals were scattered and relatively few in number but numbers have increased (perhaps due, in part, to failed ventures and deer let loose) and deer have invaded new regions. With reports of environmental damage increasing has the time come for VEAC to recommend examination of this species' status with a view to it being declared a feral pest on public land?
- **Water Frontage Bed and Banks** - this proposed re-classification is supported. However, a simpler category name of **Streamside Reserve** may be more easily understood. Decisions about renaming waterways need to be based on what can give the highest levels of management protection. Water-ways, always popular with the public, should have very clear symbols on all the signage and this could be a means of clearly delineating visually the protected status of 'stream frontage, bed and banks' - as VEAC rightly intends in the proposed new category name.
- **Signage** - Whatever the category and proposed changes all public areas need plentiful, easily understood, **standard signs and symbols** that clearly show permitted uses on site e.g. tent camping and /or caravan camping/gas stoves/4WD Drive track et al.

Section 2.5 - Legislative reform

Recommendation 3

In relation to parts (f) and (h) TWSV is concerned these changes could lead to a lack of transparency and biased entrenchment of power on the part of individuals or sections of groups.

Recommendation 6

In principle this recommendation appears to be a useful approach to shift all lands currently classified as state forest under a single enactment, and we anticipate this would probably assist with transparency. A common land tenure for state forests also appears a useful reform. We are particularly supportive of the recommendation should it assist the timely creation of nature conservation and other conservation reserves. However, we are currently unclear whether a problem may lie in the structure of the tenure, in particular what the status of informally reserved forest, for example, current 'special protection zones'*, permits and requires in terms of governance/management. **Should the recommendation have implications resulting in**

reduced protection of natural or cultural values, negative impacts on native title or impair implementation of protection under the National Parks Act then these problems would outweigh the benefits identified above and we could not support the recommendation

(*<http://www.agriculture.gov.au/forestry/policies/rfa/about/protecting-environment>)

Section 2.6 - Priorities for further assessment or review

Recommendation 11

TWSV welcomes and strongly supports draft **R11** recommending the three regions with clusters of under-represented EVCs to be assessed for additions to the protected area system:

- South-west region including the Glenelg Plain, Dundas Tablelands, Wimmera (south), Warrnambool Plain and the Victorian Volcanic Plain
- Strzelecki Ranges and Gippsland Plains Bioregions
- Central Victorian Uplands and adjoining bioregions

There are, however, a number of issues we wish to raise:

- While it is understood that such an investigation would necessarily study the 'endangered' EVCs and bioregions of these severely cleared regions of Victoria with a view to what needs to be done in relation to their protection, a wider examination of the ecosystems, including those EVCs and bioregions less threatened is also needed and vital. Less threatened vegetation classes strengthen and connect terrestrial ecological communities in the more highly cleared regions. This would mean, for instance, in far western Victoria, as well as the 'endangered' EVC's proposed for examination others, adjacent, such as stringy-bark/heathy ecosystems are needed for resilience and strong north-south connections for the ongoing health of not only the vegetation but associated fauna, for example, the nomadic, endangered south eastern Red-tailed Black-Cockatoo. In other words, these currently 'less endangered' ecosystems would also need to be included in the protected area system with a view to the long term, not short term purpose of conserving the conservation values of these public lands. This is particularly relevant to highly cleared regions such as western Victoria. For more information see TWSV submissions to previous investigations. (August 2010 and the initial submission to this review).
- TWSV also suggests that the **former category known as 'uncommitted lands'** may hold land that is useful for the protected area system in a time of climate change and therefore urges VEAC to relook at these lands currently located in the state forest category. Statements on their environmental importance have been made in past VEAC reports and in our first submission to this VEAC Investigation.
- **Future terms of Reference** - To assist a more far reaching analysis of the cluster regions we recommend government include climate change considerations in the terms of reference for investigation of these areas. For indeed, it would be a lost opportunity if an investigation into the three cluster regions did not include the wider context of climate change on land as, for example, it does on the coasts, in draft **R12** for coastal reserves.
- Also relevant in this context is VEAC's identification of the 'need to clarify the status of HVP Plantations land' (Discussion Paper p12), land a proportion of which TWSV considers should be negotiated for with a view to being used for the public good.

- The Wilderness Society considers it is urgent to do the three regional reviews soon considering they have now been proposed by VEAC more than once and there are ongoing as well as new threats emerging for these ecosystems. For example:
 - **Logging** - VicForests' recent moves to step up logging generally in western Victoria, advertising a proposal to reintroduce sawlog and residual logging into the Portland Forest Management Area (FMA)^{1*} and to continue in the western and central Victorian regions are serious threats to the nature values of public lands that VEAC proposes to study. **In this context we consider there is cause for a moratorium over the re-introduction of logging operations prior to VEAC conducting an investigation** as biodiversity and ecological values in forests may be lost prior to an investigation getting underway.
 - **Fire - Major losses of older and rare old growth in remnant public lands** in Victoria have occurred since the introduction of the 5% burn target. In the past, many of these blocks including some semi-remote, natural processes have been able to quietly evolve (albeit surrounded often by cleared farmland) in a more or less natural way. Unfortunately, under the 5% target conservation values have been lost. Although the 5% burn target has been abolished, issues with fire impacting natural values in some areas of the three cluster regions remain and need to be addressed
 - Over recent years, reduced regulation of **firewood cutting** (permits and fees) is causing increased concern over incremental damage occurring particularly in threatened, remnant gum woodlands which are main targets for firewood. This cumulative, ongoing and serious loss of habitat values is a threat that is now exacerbated by climate change. A **VEAC recommendation**, such as the exploring of options and agreements for firewood to come from blue-gum plantations, would be one way of proceeding and could take the pressure off remnant bushland. This is obviously a departure from past practice but firewood taking let alone logging the depleted public native vegetation in areas such as the Box-Ironbark, the Wimmera and other gum woodlands, for example, the Far West's Sandbank with its endangered, vulnerable and depleted ecosystems, cannot continue

Recommendation 12

TWSV supports draft R12 on coastal reserves.

Recommendation 13

TWSV supports draft **R13** to review values, uses and appropriate land category for State Forest where commercial harvesting of sawlogs has ceased as long as conservation needs are examined and met. See also other relevant comments we have made in the discussion of Recommendation 6.

Recommendation 14

TWSV strongly supports draft **R14** and is pleased that inventories of road and rail reserves, riparian land and linear coastal reserves are to be developed.

¹ See Appendix 1 for advertisement.

We do observe , however, ongoing degradation, since the 2015 VEAC's *2011 Remnant Native Vegetation Investigation*, in fragmented areas of the state through road building, felling of old and mature trees, escaping crops and ploughing of the roadsides.

We would like to repeat some points from our recommendations 16, 17 and 18 that we made in our 2010 VEAC Submission. While these inventories are taking place, we recommend shires and DELWP be given power to prevent further damage to unmade and made roadside native vegetation and be resourced to begin the rehabilitation of recently damaged priority roadside reserves; that the practice of leasing unmade roads and lanes for agricultural purposes should cease and these remnants be clearly designated roadside conservation reserves and finally that roadside fencing barriers (for example the green barriers currently being installed) should continue to be erected on roadsides to meet the dual objectives of the protection of human life and biodiversity and as an alternative to clearing vegetation on major and minor roads.

**** Additional comment on Section 2.6 - climate change resilience**

TWSV sees the strong need for a VEAC recommendation on climate change refugia. We note the omission of such a recommendation in the Draft Proposals Paper of this *Statewide Assessment of Public Land* but the impetus is already there in the discussion of

"... critical areas for climate change resilience, such as refugia, to act as core lands for a broader, whole-of-landscape scale approaches to biodiversity conservation by 2030"
and

"... core areas established for the long-term survival of threatened ecosystems and threatened species habitats in each of Australia's bioregions by 2030".

(Discussion Paper comments on the National Reserve System targets p.68).

We therefore urge VEAC to consider investigating critical areas for climate change resilience, such as refugia either as a stand-alone investigation or incorporated into future investigations - and if possible make recommendations to be included in the Final Report of this *Statewide Assessment of Public Land*.

In the context of climate change there is in the east of the state potential climate change refugia that may emerge more clearly as more research is done. In these changed circumstances more State Forest may be needed for nature conservation. Work needs to continue from now, not wait. Scientists are already saying climate change is having effect faster than forecast (see work of David Karoly Melbourne University). What knowledge there is of the past eras of climate in eastern Victoria needs to be gathered and in the meantime the precautionary principle should be used to protect what remains of the ecosystems in the eastern part of the state. Current protected area in the east is inadequate.

It is crucial the thinking and recommendations be big, look to the future, be based on science and not shackled to past and present practices. Changing community expectations observed, for example, in polls over recent decades, which consistently track concern over impacts of logging in native forests, and the emergence of climate change issues since previous LCC studies cc 1977, 1980 and 1988, all call for strong recommendations from VEAC. It is no longer credible to dismantle mature, carbon storing ecosystems (see also service section of the Discussion Paper).

Current logging of old and mature, high conservation forests in the deep valleys and high slopes of Far East Gippsland, for example, the virtual ringbarking of the Errinundra National Park, seriously jeopardises future places of refugia in the time of climate change. In this context too,

the shape of the Errinundra National Park with its long borders flanking elongated sections of the park, its disconnections and its irregular shape need resilience built in through valleys and ridges being incorporated into a much more compact and strongly consolidated protected area. In addition, there is the loss of biodiversity values and ecosystem services that cannot be justified. Corridors and connections to the coast are integral for the health of the ecology and biodiversity in Eastern Victoria.

Section 2.7 - Improved information and information systems

TWSV supports recommendations 16, 17 and 18.

Conclusion

An adequately resourced and healthy protected public land system in Victoria is aligned with The Wilderness Society's aim to protect, promote and restore wilderness and natural processes across Australia for the survival and ongoing evolution of life on Earth. Established in 1976, the Wilderness Society has been at the forefront of Australia's most historic environmental campaigns.

TWSV recognises Traditional Owners have a legitimate right to claim title over land and sea, and is supportive of joint- and co-management arrangements. We are supportive of Traditional owner rights and interests being formally recognised in the tenure system, in the most appropriate manner for Traditional Owners.

Climate change must now be a major part of any process that looks at public land and, in this particular context, the protected area system of Victoria. We note, in the foreword of this report, the intention of the Victorian Environmental Council to further review and assess in order to 'improve the representativeness of Victoria's protected area system'. TWSV would like to take the opportunity to urge the Council while doing this to look at what may be needed over and above the current understanding of representativeness - such as comprehensive, adequate and representative, (CAR) and JANIS Criteria -which evolved before the implications of changing climate were as understood as they are now.

As Geoff Lacey writes in the opening chapter of his book *Reading the Land 2008*, "It is no accident that many people in all nations are rediscovering the natural world" and that "as we become more aware of nature we recognise relationships among plants and animal species and between these and the rocks, soil and water", landscape being where all living things and elements coexist and interact as a connected whole [providing] "resources for our sustenance, and yet much more than that ... powerful, but at the same time vulnerable and needing our care".

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**REQUEST FOR TENDER AND
EXPRESSION OF INTEREST (EOI)**

**Box-Ironbark and Mixed Species
Sawlog, Firewood & Posts**

VicForests is seeking responses to this Request for Tender and Expression of Interest (Tender) for commercial harvesting of timber from State forest in western Victoria in the Horsham, Bendigo, Midlands, Otways and Portland Forest Management Areas (FMA). Products include mixed species and durable species sawlog, firewood and posts.

Expressions of Interest are sought for mixed species sawlog and residual log in the Portland FMA.

Applications must be received in accordance with the Tender and Expression of Interest document.

Tender and EOI documents can be obtained, from 17 October, by contacting the Tender Manager, Bill Paul by email (community.forestry@vicforests.com.au) or phone (0428 583 371) or from VicForests' website at the address below: <http://www.vicforests.com.au/sales-supply/community-forestry-western-victoria-1/community-forestry-western-victoria>

Applications close at 2.00pm on Friday 11 November 2016.

Applications may be received in person, by mail or email.

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