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Submission re: Proposed VicForests' 2011 Timber Release Plans

This submission highlights our concerns about proposed timber harvesting coupes in the 2011 Timber Release Plans. These comments are directed to VicForests but also encompass issues regarding the overall management of our forests as we understand all submissions will be forwarded to the Secretary of DSE for further consideration.

In principal we oppose all clear fell logging coupes listed on the 2011 Timber Release Plan. We believe clear fell logging is not sustainable in the remaining Mountain Ash forest of Victoria's Central Highland forests. Clear fell logging destroys the present and future ability of our forests to support essential ecosystem services, including carbon storage and provision of habitat to protected flora and fauna.

It is clear to us that our forests have been over logged already and this was confirmed in the recent Treasury report. And coupled with the impacts of the 2009 bushfires we believe there is no longer enough mature forest left to provide future habitat for our endangered fauna species, allow our water catchments to function to the best of their ability and provide carbon storage areas to help mitigate climate change and to accommodate continued clear fell timber harvesting. Any additional destruction of these forests is unsustainable and unjustifiable from an ecological and economic point of view. We believe VicForests is unsustainable ecologically due to their clear fell practices and poor protection of habitat values within and around coupes and poor rate of coupe rehabilitation, and financially due to the production of low grade timber products (75-85% woodchip) which seem to cost more to log than the final product is worth, reliance on tax payer funded grants to continue operations and absence of paying dividends (stumpage fees) back to the people of Victoria for destroying and selling a public resource.

Indeed, given the objectives of the "Sustainability Charter for Victoria's State Forest's" are underpinned by the principles of ecologically sustainable development, as defined as "...development that improves the total quality of life both now and in the future, in a way that maintains the ecological processes on which life depends" we believe timber harvesting in Victoria needs to be halted and reconsidered until it can be shown to be done sustainably. The coupes listed on this 5 year Timber Release Plan will destroy large areas of remaining unburnt forest around Marysville, Toolangi and Powelltown that, after the 2009 bushfires, form very significant corridors of habitat for Leadbeater's Possum and which are very significant refugia from which many species will radiate to repopulate the burnt forest as it regenerates. The new coupes need to be looked at in the context of the impact of the 2009 bushfires, the BAER Report recommendations and the last 30+ years of logging intensity.

While we are a community group dedicated to the conservation of our Endangered State Faunal Emblem, we believe that Leadbeater's Possum acts as a flagship species to help protect habitat for a range of other forest dwelling animals, in particular those which are dependent on access to tree hollows for nesting sites. Thanks to many decades of scientific research to understand their habitat needs, Leadbeater's Possums are well represented in State and Federal threatened species legislation, policies and management plans. Indeed few Victorian endangered species are as well documented and yet Leadbeater's Possum populations are continuing to decline towards extinction.

Our key concerns with the timber harvesting coupes on the proposed 2011 TRP amendments:

1. Timber harvesting bordering and encroaching on SPZ and Leadbeater's Possum Permanent Reserve Areas.

With the history of clear fell logging and the wide scale destruction of forests in the 2009 bushfires, we have lost large areas of multi-aged forest that have provided, and could continue to provide, habitat areas for hollow dependent animals such as Leadbeater's Possum. Therefore, all efforts must be taken to adequately conserve all Special Protection Zone (SPZ) areas. We are concerned that logging coupes that overlap or directly border SPZ areas are likely to damage the SPZ areas. Adequate buffer zones must be placed around all SPZ boundaries where no timber harvesting takes place to reduce loss of SPZ due to accidental over-logging and regeneration burns overshooting the coupe boundaries. Recent examples of logging in this delicate area have shown broad scale destruction and the loss of potential LBP habitat trees and an inability to protect habitat trees in regeneration burns. (e.g. 298-874-0008 "Big Kahuna")

2. Protection of critical long-term Leadbeater's Possum habitat monitoring sites.

The Australian National University has 168 long term monitoring sites dotted across the Central Highlands forests which make up one of the longest forest ecology studies in the world. These monitoring sites are critical for our understanding of the status of our forests, their recovery after fire and the impacts of disturbance on forest structure and habitat values for a range of fauna species. This long term monitoring program is supported by the Victorian government, indeed the government relies on information from this research. Despite this, each year some of these monitoring sites are lost to destruction during timber harvesting operations and associated road works. And again we see many of these sites threatened in the 2011 TRP, some being completely surrounded by logging coupes which will effectively cut the monitoring sites off from the rest of the forest leaving them isolated and not representative of the surrounding forest (which in many cases will no longer exist). This will require them to be removed from the monitoring program and the data lost. The disregard for monitoring the state of our forests and habitat availability for threatened species protected under State and federal legislation shows that timber harvesting in these areas is ecologically unsustainable and should not be permitted.

3. Aggregation/Clusters of Coupes.

In some areas, many coupes are being placed adjacent to each other effectively taking out a very large area of connected forest. This results in wide scale destruction and loss of connectivity through the forest, which is particularly damaging within areas of ecologically mature forest with little or no impact from the bushfires. We believe these areas should be disallowed under the Code of Practice for Timber Harvesting aggregation rules. While the individual coupe size may be within the code, placing many side by side is not allowed.

4. Logging in Water Catchments

We object to all logging in closed and other water catchments. The destruction of the Armstrong Water catchment, some of the most significant old growth forest in Victoria pre and post 2009 bushfires is inexcusable. Coupes are threatening to cut off the forest links between the O'Shannassy water catchment and the Armstrong Water catchment due to extensive green coupe logging and salvage logging along the western edge of the Armstrong Water Catchment along Observation Road. The water catchments are the largest strongholds for Leadbeater's Possum. Even areas that were burnt in 2009 will return to excellent habitat in 10-15 years when the wattle understorey regenerates because there is a high density of stag trees to provide nesting sites. Logging in water catchments, should be illegal as under no circumstances can it be considered sustainable.

5. Lack of connectivity across the broader forest landscape.

Large areas of connected forests, or corridors, are required to help animals disperse and find new habitat areas to allow future generations to find habitat areas and ultimately survive. When areas of habitat become isolated the population will decrease and areas of geographical extinction will occur. Ecologically mature Mountain Ash forests in the Central Highlands, particularly those that remain unburnt after the 2009 bushfires, are becoming very rare indeed. We believe some areas where connectivity still occurs must be preserved and added to reserve systems. Therefore we propose 3 key Link Areas where we oppose all clear fell logging coupes. *We recognise these link areas are a new concept we are introducing in this submission but believe they are worth considering in terms of broader forest management issues by DSE and will be taken up with them directly. For the purposes of explaining the concept they have been defined in this submission.*

1. Kalatha Link Area: This area represents a significant stronghold of ecologically mature, relatively intact (except from recent logging activity), unburnt forest that is confirmed Leadbeater's habitat. Therefore we believe it to be a very important area from which clear fell logging must be excluded. Proposed coupes and granted coupes we object to in this Link area include: **297-826-0002 (Freddo); 297-526-0001 (Gun Barrel); 298-509-0001 (South Col); 300-501-0001 (The Screw); and 300-901-0009 (Cog).**

2. Cambarville Link Area: Cambarville has long been a critical stronghold for Leadbeater's Possum and was the site of the rediscovery of the species on 3rd April 1961. Though it was badly burnt by the 2009 bushfires, it still represents an area of old forest that was burnt. The many mature trees will create a high density of available nest hollows and with the recovery of the understorey will soon provide a critical habitat area for Leadbeater's Possum into the future. The area also contains important cultural heritage values. Coupes in this area we object to include: **312-512-0007; 312-512-0006; 312-512-0002; 312-512-0005; 312-512-0004; 312-512-0003; 312-512-0008**

3. Monda Link Area: While burnt in the 2009 bushfires, this area was known Leadbeater's Possum territory pre-fires and when the understorey adequately recovers it will form a key habitat area linking the closed Maroondah water catchment, key Leadbeater's Possum Permanent Reserve areas and other SPZ. Coupes in this area we object to include: **300-545-0002; 300-537-0003; 300-545-0004.**

In addition to the coupes in these link areas, we object to the following proposed coupes:

Coupe Address	Objection Concerns
Toolangi Area	
297-505-0001	These 6 sites encompass a very large area of forest that is already delicate due to the fires but also adjacent to significant areas of SPZ and Leadbeater's Possum permanent Reserve System. Including the logging history in this area this needs to be checked for over-allocation /aggregation in this area.
297-509-0002	
297-509-0001	
297-511-0001	
297-511-0002	
297-511-0003	
299-500-0002	ANU Site 747 is surrounded by this coupe and will be destroyed.
297-826-0002	These two coupes are directly linked to, and overlap areas of SPZ. They are also in a significant area of Leadbeater's Possum habitat and part of the Kalatha Link Area.
297-526-0001	
298-509-0001 South Col	This coupe is in very significant forest and should never be logged. This is a flagship coupe that shows how unsustainable logging in unburnt mature Mountain Ash forest is. This area is contiguous with key areas of SPZ and Leadbeater's Possum Reserve areas, it displays a now rare density of hollow bearing trees and is likely to be largely Zone1A and therefore should be avoided. The degree of sensitivity it would take to log this coupe and not destroy Zone1A is beyond the current capacity of VicForest and we fear it will end up looking like the devastated 298-874-0008 (Big Kahuna) where NO habitat values were spared from the chainsaws and regeneration fires.
300-501-0001	These coupes are adjacent to SPZ and Leadbeater's Possum Permanent Reserve areas and form part of the Kalatha Link Area.
300-901-0009	
300-545-0002	These coupes are adjacent to closed water catchment, SPZ and Leadbeater's Possum Permanent Reserve System. This is a known area for LBPs pre-fire and is likely to be critical habitat for them in the near future. These form part of the Monda Link Area. They are also adjacent to important ANU monitoring sites where LBPs have been recorded in the past.
300-537-0003	
300-537-0004	
312-512-0008	This coupe encompasses an ANU Monitoring site.
310-509-0005	These coupes are adjacent to large areas of SPZ, they encompass and will destroy a key ANU monitoring site with confirmed presence of Leadbeater's Possum. <i>This is a critical future habitat area of Leadbeater's Possum and must not be logged.</i>
310-509-0002/4 (unclear on map, directly south of 310-509-0005)	
Cambarville Area	
312-512-0007	These coupes are a heavy aggregation around the Snowy Hill area in Cambarville. This is a very significant habitat area for Leadbeater's Possum and is likely to be again in the future if it remains unlogged. It is also adjacent to key areas of National Park and water catchment and forms the ideal area for increased habitat protection. These coupes should be refused and the area protected as the Cambarville Link Area.
312-512-0006	
312-512-0002	
312-512-0005	
312-512-0004	
312-512-0003	
312-512-0008	

Armstrong Water Catchment Area	
343-533-0002	These coupes will destroy a very important linking of habitat areas for Leadbeater's Possum between the O'Shannassy and the Armstrong water catchments. There is no justification for logging in our water catchments and any timber industry which logs catchments is truly unsustainable.
343-526-0004	
343-518-0001	
343-518-0002	
Starvation & Cement Creek Water Catchments	
342-501-0001	We object to all of these coupes as they are (clear fell, selective and thinning) in water catchments. We are opposed to all logging in both closed and open catchments. Our water catchments have long been protected for their ecosystem values but as Vicforests runs out of older forest to log outside of the catchments, we increasingly see more logging coupes inside our precious catchments. This is truly unsustainable and signifies a desperate grab for wood that will result in long term environmental destruction.
342-501-0002	
342-501-0003	
342-501-0004	
344-511-0002	
344-510-0003	
344-510-0009	
342-502-0002	
342-502-0003	
345-504-0006	
344-509-0007	
344-552-0004	
Marysville Area	
288-519-0001	This coupe encompasses and will destroy an ANU monitoring site.
285-012-0022	This coupe is located inside a significant area of SPZ and on top of an ANU monitoring site. Roadworks to access this coupe will be destructive to SPZ areas. This is evidence of very poor planning indeed showing no regard for SPZ values. Proposal of this coupe is evidence that the forests have been <i>over logged</i> , making it clear VicForests is running out of appropriate areas to access mature forests.
288-512-0001	These coupes encompass SPZ areas. The area of SPZ in 288-512-0001 shows a clear link between other areas of SPZ and Park area. Logging of this coupe is very likely to damage this SPZ corridor link.
288-512-0002	
Powelltown Area	
348-525-0007	After the 2009 fires, the Dowey Spur area of 1989 regrowth has been a significant area for Leadbeater's Possum habitat. Indeed it is the area where they have been most seen in recent years, thriving in the regrowth forest because it has a large supply of stags for nesting sites. Logging this area, at such a young regrowth age would destroy some of the most critical habitat we have for Leadbeater's Possum. The whole Dowey Spur and Dowey Fire Line area should be left to mature as habitat into the future and not be logged again. This is also an important area of new Leadbeater's Possum research.
347-502-0002	
347-502-0032	
347-503-0030	
347-501-0005	
347-501-0001	This coupe is adjacent to SPZ and an ANU monitoring site.

It is clear from the locations and extent of logging coupes in this TRP that VicForests is running out of areas to access higher commercial value older Mountain Ash forests. Therefore they have to situate logging coupes over or directly adjacent to very important areas of Special Protection Zones, near

areas of cultural values, near/visible to townships and tourist areas and long term ecological monitoring sites. If these coupes are allowed to go ahead it demonstrates a willingness to support an ecologically unsustainable industry that is financially struggling and produces overall low quality forest products, over the protection of forests that provide valuable ecosystem services including carbon storage, water catchments and threatened species habitat.

It is clear the forests of the Central Highlands can no longer accommodate a 20th Century clear fell based timber industry we still have, and a dramatic re-think of how we manage our forests needs to be undertaken immediately. The rest of the world is leaving Victoria behind, striving for sustainably sourced timber products which VicForests does not and cannot supply.

We recognize that this submission makes reference to many complex and sometimes controversial issues. While we do not aim to represent ourselves as experts in logging operations and forest management, we do have a very well educated and informed membership and a deep concern for the future well being of our forests and the many species that depend on them. We welcome the opportunity to discuss the issues presented in this submission further if required.

Yours sincerely



Sera Blair, PRESIDENT

This submission has also been sent to:

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