

SUBMISSION

Review of the *Flora and Fauna Guarantee Act (1988)*

March 2017

Executive summary

The Victorian Association of Forest Industries (VAFI) appreciates the opportunity to comment on the Consultation Paper of the *Review of the Flora and Fauna Guarantee Act 1988*. In Victoria, the *Code of Practice for Timber Production 2014* mandates compliance with the *Flora and Fauna Guarantee (FFG) Act* Action Statements. Consequently, FFG Act implementation is well integrated into forestry planning, management and harvesting and the proposed focus of future implementation at the landscape scale has the potential to fit well with existing planning processes.

Substantial and ongoing species protection measures and landscape benefits are already provided by forest management. The forest, fibre and wood products industry has the potential to contribute to future strategies if there is a guaranteed supply of timber resource. VAFI does not, therefore, support any actions that will reduce the area of productive forest in Victoria. Species conservation actions should balance species needs with achieving a vibrant forest, fibre and wood products industry grounded in sustainable forest management. Therefore, we urge the government to consider landscape-scale strategies that allow forest managers to promote biodiversity values alongside sustainable silviculture and timber harvesting.

VAFI supports a consistent and transparent listing processes for threatened species that allows extensive public input. However, the focus of the listing process should be at the state level, and control of the listing process should be retained by Victorian agencies.

The concept of damage to critical habitat has potentially extensive and continuing implications for forest management. Criteria for defining both “critical habitat” and “damage” should be developed in collaboration with land managers and other stakeholders.

A new legislative framework should not create new administrative barriers to current management operations in State forests, specifically VAFI has concerns regarding:

- Public Authority Management Agreements, and
- Obligations to document and demonstrate compliance.

There should be comprehensive transition planning to any new framework, informed by in-depth consultation with industry to minimise the impact to industry of new regulations or policy approaches.

About the Victorian forest, fibre and wood products industry

The forest, fibre and wood products industry is a vital industry for Victoria and a key contributor to the state's economy. The industry is a major driver of economic activity and jobs in Victoria, generating \$7 billion in sales and service income annually.¹ Much of the income generated by the industry remains in local communities, particularly so in rural and regional Victoria.

Throughout the state, the industry directly employs approximately 21,000 people. Around 90% of these directly employed workers are in primary and secondary processing roles; essentially timber manufacturing applications, such as appearance product manufacturers, furniture manufacturers, and timber fabricators.

Indirectly, the industry also supports a further 40,000 to 50,000 jobs through flow on economic activity. This includes value-adding roles, such as the nearly 10,000 people who work making timber furniture, cabinetry and in joinery manufacturing.²

For Victoria's industry to best position itself to meet future market demand, both nationally and internationally, there is an immediate and ongoing need for consistent policy settings, at the local, state and national levels. Forestry is a long-term business and needs the security of a long-term vision to be a strong, viable and sustainable industry. Security of resource is paramount for a successful industry in short, medium and long-term.

About VAFI

VAFI is the peak representative body for the Victorian forest, fibre and wood products industry. VAFI represents the entire lifecycle of forestry and wood products, including forest owners and growers, harvest and haul businesses, wood and paper processors, manufacturers and associated businesses across both the native forest and plantations sectors. We support and encourage best practice in industry and forest management.

The long-term vision for the forest, fibre and wood products industry in Victoria is that of growth, stability and sustainability. The forest, fibre and wood products industry is a 21st century employer and wealth generator. It is a sunrise, not a sunset industry. What the industry needs from all levels of government – national, state and local - is clarity and consistency in policy positions and decisions that support the long-term future of the forest, fibre and wood products industry.

¹ ABS (2016) 8155.0 Australian Industry, 2014-15

² Schirmer, J (2010) *Socio-economic characteristics of Victoria's forestry industries*

Introduction

In Victoria, forest management and harvesting operations must comply with the *Flora and Fauna Guarantee Act 1988* (FFG Act). Forest growers, managers and harvesters are governed by the *Code of Practice for Timber Production 2014* (The Code of Practice) which states that:

“The management standards and procedures are informed by relevant policy documents including policies relating to specific forest values such as threatened species, guidelines and strategies within forest management plans made under the Forest Act 1958 and Action Statements made under the Flora and Fauna Guarantee Act 1988.”

Action Statements prepared under the FFG Act are relevant to forestry operations at several levels. They cover numerous individual species, ecological communities and potentially threatening processes. Most decision makers are not required to consider Action Statements in their management processes. However, the compliance requirement created by the Code of Practice has been reflected not only in mandatory Management Standards and Procedures³, but also in forest management planning and zoning undertaken by VicForests – the agency responsible for managing Victorian State forests – and its contractors.

State forest zones are classified⁴ as follows:

- General Management Zone (GMZ): managed for a range of uses and values, but timber harvesting operations will have a high priority
- Special Management Zone (SMZ): managed to conserve specific features, while catering for timber harvesting operations under special conditions that are set out in a specific plan.
- Special Protection Zone (SPZ): managed for particular conservation values (e.g. protecting threatened species), forming a network designed to complement the formal conservation reserve system. Timber harvesting operations are excluded.

The area where timber is legally available for harvesting is made up from GMZ and SMZ areas which constitute a very small fraction of Victoria’s total native forest area.⁵ Areas classified as ‘reserved’ are forests within SPZs, and other exclusions such as riparian buffers and steep slopes.

The legal and moral obligations to protect and maintain environmental values are taken seriously by the forest, fibre and wood products industry. As the Consultation Paper rightly notes, this is an area where the current approach to implementing the FFG Act has worked well.⁶ VAFI’s position is that any proposed changes to the structure or implementation of the FFG Act should recognise the substantial landscape management contributions of the industry and should not create new barriers to operation. Future strategies and regulations should seek to maintain the balance between forest conservation and sustainable management and harvesting.

³ *Management Standards and procedures for timber harvesting operations in Victoria’s State forests 2014*

⁴ *VicForests Procedures Regulatory Handbook 2016*

⁵ VicForests Area Statement 2014

⁶ Consultation Paper p 25

Landscape scale approaches

The Consultation Paper proposes a requirement for a landscape or area-based response to the Biodiversity Plan (Table 12 Potential Improvement 5). VAFI recognises the value in creating greater efficiency of action by transitioning from focusing on localised individual species to a broad landscape approach.

To a large extent, this approach is already employed by VicForests, who assess the requirements of multiple Action Statements to implement coordinated planning and management of State forests to protect species listed under the FFG Act. These considerations are reflected in the creation and maintenance of SMZs and SPZs.

In addition to abiding by Action Statements, Victorian forest managers are legally obliged by the Code of Practice to protect ecosystem structures and functions. There is a suite of mandatory actions to maintain environmental values and minimise impacts on cultural values and the visual landscape. These actions include:

- Managing harvested forest to perpetuate biodiversity values;
- Regenerating harvested areas using seed sources with provenance to the area;
- Maintaining species composition and representative gene pools;
- Monitoring and maintaining forest health (e.g. weed and pest control);
- Measures to protect all unharvested areas from the impacts of unplanned fires;
- Protecting waterways and riparian habitat using buffers and filter strips;
- Minimising water pollution; and,
- Maintaining the productive capacity of soils.

A previous submission from VAFI to the draft Victorian Biodiversity Plan to 2036 (May 2016) outlined the numerous ways that sustainable forestry can maintain and improve biodiversity values across the state (see Appendix 1). These include innovative, multi-aged silvicultural systems, applied to low-yielding mixed species forests. In the long-term, these harvesting approaches can attain commercial returns while maintaining a mixed-age forest, where key biodiversity values are retained or can quickly recover to pre-harvest levels.

Establishing new plantations of native tree species on private property should also be encouraged in strategic biodiversity planning. Reforestation of native species managed for harvesting deliver landscape scale biodiversity benefits.⁷ For example, converting pasture to Eucalypt plantations can protect adjoining remnant patches of native vegetation by preventing impacts at the patch edge and providing movement corridors between patches.

VAFI supports the overarching principle of an efficient approach to threatened species protection using a landscape-scale planning approach. We wish to highlight the significant landscape management already undertaken by the forest, fibre and wood products industry and the potential for significant further benefits if the industry is enabled to develop its role as a land manager.

⁷ Cooperative Research Centre for Forestry (2011) *Technical Report 215, Biodiversity outcomes from eucalypt plantation expansion into agricultural landscapes of southern Australia: A review*

The industry has substantial landscape experience and resources to offer to biodiversity management strategies. However, reducing the level of resource available is detrimental to the industry and inhibits the potential for investment and innovation. Better outcomes would be achieved if landscape scale strategies maintained the harvestable area in State forests while encouraging new planting on both public and private land to augment supply to industry. Active and innovative approaches to improving biodiversity can be developed in collaboration with the forest, fibre and wood products industry, and should be considered in preference to simply reducing the area of State forest currently available for timber harvesting.

VAFI does not support any strategic response to the Biodiversity Plan that results in a net reduction to the area of State forest available and suitable for harvesting. We recommend that future landscape scale responses to the Biodiversity Plan should fully examine the existing and potential landscape-scale benefits offered by:

- **Sustainable silviculture and harvesting in State forests,**
- **SMZs and SPZs in State forests,**
- **The role of silviculture in rehabilitating degraded forests, and**
- **Increasing the area of native plantation for harvesting on private land.**

Listing threatened species and communities

The Consultation Paper proposes that Victoria adopt the Common Assessment Method (CAM) to align with national (Environmental Protection and Biodiversity Conservation Act) and international (IUCN) threatened species listings processes (Table 13, Proposed Improvement 1). VAFI supports consistency and clarity in the threatened species listing process at all levels. However, the CAM includes "*the capacity to adopt assessments made by other jurisdictions that are relevant to Victoria*".

VAFI does not support this aspect of the proposal because of the potential to remove transparency and undermine the credibility of the of the Victorian assessment process. No further detail is given on the proposed procedure for adopting assessments from outside jurisdictions, or on how differing assessments will be reconciled. However, assessments made by non-governmental agencies (e.g. the IUCN) should not be used without full and transparent evaluation by the Scientific Advisory Council (SAC) and public input.

Control of the listing assessment process must remain with Victorian authorities. To maintain credibility, transparency and meaningful stakeholder engagement, new species assessments using the CAM, must be completely independent of previous assessments carried out by other agencies.

With regard to investigating criteria for defining threatened communities (Table 13, Proposed Improvement 3), the IUCN criteria for ecosystem assessment⁸, introduced in 2013, are problematic and open to highly subjective interpretation. The assessment guidelines have been

⁸ Keith, DA, Rodríguez, JP, Rodríguez-Clark, KM, Nicholson, E, Aapala, K, *et al.* (2013) Scientific Foundations for an IUCN Red List of Ecosystems. *PLoS ONE* 8(5): e62111. doi:10.1371/journal.pone.0062111

subject to extensive criticism, which identified operational and conceptual weaknesses in the approach and highlighted the lack of scientific basis for categories and thresholds.⁹

VAFI supports retaining full control of the threatened species listing process (data gathering, assessment and stakeholder engagement etc.) by Victorian agencies. If CAM criteria for threatened species is implemented, it would therefore not be appropriate to adopt assessments from outside jurisdictions. VAFI also does not support the use of IUCN assessment criteria for ecosystems.

Critical Habitat

The Consultation Paper proposes replacing permits for taking protected flora and fauna with a permit for activities that would 'damage' the critical habitat (Table 14 Proposed Improvement 3). VAFI supports the protection and maintenance of important forest habitat and notes that protection measures are already used by forest managers (e.g. SMZ and SPZs, protection of very large or tall trees etc).

Broadening the definition of critical habitat has the potential to impact on forest management and harvesting, if areas of State forest are deemed to be "critical" under new criteria. Furthermore, the concept of "damage" to an ecosystem is not defined in the Consultation Paper. Ecosystems function at multiple spatial and temporal scales and assessment of potentially damaging activities should account for the ability of an ecosystem to regenerate following small scale disturbances while maintaining function at the landscape scale.

The discussion of critical habitats proposes that *"Maps of potential critical habitat areas would be tested and improved through consultation with landowners, the Scientific Advisory Committee and the community. This process would inform final declarations of critical habitat."*

Given the complexity of the concepts under discussion, VAFI's position is that it would be more appropriate to engage stakeholders from the start of the process and develop the necessary definitions in a collaborative manner. This approach would allow the full implications of the proposed permit process to be fully evaluated.

VAFI recommends, therefore, that DELWP engage in full and transparent stakeholder collaboration to agree criteria for:

- **Defining critical habitat, and**
- **The concept of 'damage' to habitat.**

⁹ Boitani, L, Mace, GM & Rondinini, C (2014) Challenging the scientific foundations for an IUCN Red List of Ecosystems. *Conservation Letters*. doi: 10.1111/conl.12111

Administrative barriers to forest management and harvesting operations

The Consultation Paper recognises that implementation of the FFG Act is currently well integrated into forestry operations and planning. However, this integration is not noted elsewhere in the paper. There are several proposed improvements that, if applied to forest management and harvesting operations, would duplicate existing governance and regulations with little additional benefit. VAFI urges DELWP to consider how all the proposed improvements might act to replicate the Code of Practice and adjust the implementation accordingly. Below we outline some of the key issues.

Public Authority Management Agreements (Table 10, Proposed Improvement 4)

The proposal to broaden the scope of Public Authority Management Agreements (PAMA) makes specific mention of forestry, regarding guidance on managing threatened species. As detailed above, there are well established and satisfactory procedures for managing and protecting a suite of environmental values. Mandatory Management Standards provide detailed guidance for maintaining environmental sustainability and biodiversity, and Action Statement obligations are met through forest zoning and operational planning. Additional guidance developed through a PAMA has the potential to generate a new stream of administrative obligations without creating additional outcomes for threatened species or forest biodiversity.

VAFI requests that DELWP publish a detailed proposal for new functions of PAMAs which is subject to consultation with land managers on both public and private land. VAFI recognises the value of clear guidelines on biodiversity management but does not support the introduction of a new system for forestry in addition to existing regulations.

Compliance and enforcement (Section 4.4.3)

Forest management and harvesting operations are already legally required to by the Code of Practice to abide by FFG Act Action Statements and compliance and enforcement mechanisms already exist for this.

VAFI advises that new compliance requirements are not needed and would create extra administrative burden to the sector. Any proposed changes should not be applicable to forest management activities.

Transition planning

As described above, the instruments of the FFG Act are fully integrated into forest management at all levels from planning to harvesting operations. Accordingly, environmental obligations and mandatory operational practices are well understood by forest managers and contractors. There is, therefore, a risk that new instruments, processes or legal requirements will be highly disruptive to the industry, even where the final outcomes are similar to those being replaced.

The Consultation Paper does not discuss the process for moving to new arrangements or frameworks. Therefore, this submission notes the risks of associated with insufficient transition planning. These include:

- Inconsistent implementation of new frameworks;
- Loss of production; and
- Unintended non-compliance with new instruments.

VAFI recommends that DELWP collaborate with forest managers and other industry representatives to establish an agreed plan for transition to any new arrangements over an appropriate time scale.

APPENDIX 1: VAFI submission to *Protecting Victoria's Environment – Biodiversity 2036*, May 2016

Executive summary

VAFI appreciates the opportunity to contribute to consultation on *Protecting Victoria's Environment – Biodiversity 2036* (the Biodiversity Plan). In this submission, we offer input on how the Victorian forest and wood products industry can make significant contributions to the aims of the plan.

Forests provide a wide range of ecosystem benefits to all Victorians, including a renewable and locally produced resource in the form of wood and wood products. The forest and wood products industry employs modern sustainable forest management and harvesting to maintain and enhance the full range of ecosystem benefits derived from forests. These benefits include:

- Sustainable wood products.
- Maintained ecosystem structure and function in native forests.
- Protected biodiversity.
- Fire risk reduction.
- Increased carbon sequestration.
- Greater water yields from catchments.

The forest and wood products industry can therefore play a key role in achieving the aims of the Biodiversity Plan. For the industry to fully contribute, VAFI recommends that the Biodiversity Plan should:

- Recognise that modern silviculture can maintain and enhance ecosystem function while also providing local jobs and contributing significantly to the economy;
- Acknowledge the forest and wood products industry as stewards of environmental assets that provide benefits to Victorians;
- Promote engagement with industry stakeholders to develop environmental accounting systems that incorporate the full range of ecosystem benefits from Victorian forests, including wood products;
- Promote the expansion of green architecture using timber and engineered wood products;
- Encourage landowners to engage in ecologically appropriate forest management and sustainable harvesting that will complement environmental stewardship schemes; and
- Recognise the importance of a consistent, cross-tenure regulatory system for forestry on public and private land, carried out under the Code of Practice.

Priority 4: Be the first state in Victoria to adopt the UN system of Environmental-Economic Accounting as a way to embed environmental considerations into whole-of government decisions making

The Biodiversity Plan proposes that Victoria will adopt the UN system of Environmental-Economic Accounting for valuing the total benefits and values derived from environmental assets. VAFI stresses the importance of recognising the full range of ecosystem benefits, including those provided by wood products.

Wood is a sustainable product with a lower environmental impact than many alternative products (such as steel or concrete). Moreover, the use of locally produced wood products sourced from sustainably managed forests reduces demand pressure on hardwood forests overseas where harvesting can have a much more severe environmental impact. Management for the services and benefits provided by timber harvesting can complement and enhance the broad environmental benefits provided by Victoria's forests.

In Victoria, forest managers are legally obliged to protect ecosystem structures and functions. Commercial forestry in Victoria is undertaken in compliance with the Code of Practice for Timber Production (the Code of Practice). The Code of Practice contains a suite of mandatory actions to maintain environmental values and minimise impacts of cultural values and the visual landscape. These actions include:

- Managing harvested forest to perpetuate biodiversity values;
- Regenerating harvested areas using seed sources with provenance to the area;
- Maintaining species composition and representative gene pools;
- Monitoring and maintaining forest health (e.g. weed and pest control);
- Measures to protect all unharvested areas from the impacts of unplanned fires;
- Protecting waterways and riparian habitat using buffers and filter strips;
- Minimising water pollution; and,
- Maintaining the productive capacity of soils.

The Biodiversity Plan should, therefore, take into account the role of the forest and wood products industry in maintaining all environmental services that all Victorians benefit from. Below, we provide examples of the role the industry can play in using best-practice silviculture to maintain or enhance ecosystem function while also benefiting local economy and generating jobs.

Biodiversity

Large areas of native forest land in Victoria are fragmented or disturbed, leading to reduced ecological function. In these areas, further dieback is likely to occur, driven by a wide range of environmental factors (e.g. drought, fire, soil erosion, increased pressures from insects and herbivores). In appropriate cases, the industry can apply locally appropriate management, including sustainable harvesting, to regenerate forests and stabilise habitat losses over the long-term, while also achieving carbon abatement and economic outcomes. This can be either through managing degraded forests to improve structure and function, or converting private land to native forest.

Improving disturbed forest

The Ironwood Project was established in East Gippsland in 2010 to develop and assess silvicultural methods that can rehabilitate degraded forest, by improving structure and biodiversity while also delivering a financial return on wood resources.

The project is developing a multi-aged silvicultural system, applied to low-yielding, low elevation mixed species (LEMS) forests that will provide small volumes of durable species for sawing into high value products. This includes “thinning”, single tree and gap selection techniques that contribute to improved structural diversity compared to current systems. In the long-term, these harvesting approaches will:

- Maintain a mixed-age forest area with a range of tree sizes/ages or growth stages;
- Provide conditions for any under-represented durable species to return to the site;
- Leave the site in a state where key biodiversity values are retained or can quickly recover to pre-harvest levels;
- Attain commercial returns;
- Maintain or improve total carbon balance through sequestration in harvested products and growth of the retained forest;
- Involve relevant Reconciliation Action Plans for management, cultural issues or employment opportunities;
- Maintain site aesthetics; and
- Leave the site in a condition where the fuel hazard is no higher than that pre-harvest fuel hazard or that future fuel reduction aims are not compromised.

The Ironwood project is still in progress and best practice silviculture approaches are still being refined, however, an interim project assessment¹ concluded that:

- The project has demonstrated that uneven-aged silviculture can be safely practiced in the multi-aged LEMS forests and broadly maintain their mixed-age structure;
- This harvesting approach has not significantly compromised biodiversity while producing quality sawlogs;
- It is likely that outcomes from this project will bring “new wood” to the industry by allowing harvesting in previously uncommercial areas, so reducing demand pressure on currently harvested areas;
- The overall fuel hazard appears to have been reduced. The hazard could be further reduced if a market for residue including branch wood is developed; and
- Mixed-age forests have capacity for on-going and substantial carbon sequestration.

VAFI encourages the government to use the Biodiversity Plan as a framework for engaging with industry partners to agree methods for identifying and assessing disturbed forest areas where long-term private management can deliver multiple benefits. We also encourage further consultation to develop approaches to stimulate long-term investment in these resources.

¹ Flinn, DW (2012) *Durable Timber Productivity and Ecological Project, East Gippsland. Documentation of results from the first trial coupe*

Native forest plantations

Establishing new plantations of native trees on private property should also be encouraged by the Biodiversity Plan. Reforestation of native species managed for harvesting deliver landscape scale biodiversity benefits.² For example, converting pasture to Eucalypt plantations can protect adjoining remnant patches of native vegetation. Benefits to remnant patches include:

- Reducing negative effects of livestock grazing;
- Reducing the magnitude of biophysical and biological degradation at edge of remnants;
- Facilitating the dispersal of organisms between remnants; and
- Inherent biodiversity value in their own right, which is significantly higher than agricultural land.

Carbon sequestration

There is significant research showing the potential for reductions in greenhouse gas emissions through forest-related activities. Sustainably managed forests and wood product industries can make a positive contribution to abating and offsetting emissions and produce better long-term carbon reduction outcomes than decreasing or ceasing harvesting.

The major pathways for emissions abatement are:

- The carbon sequestered in growing forests;
- The carbon stored in harvested wood products;
- The substitution of high-emissions materials (e.g. steel, concrete) with wood and other fibre based products that have a substantially lower emissions footprint³; and
- The use of wood waste for renewable energy, replacing fossil fuels.

Research that accounted for these multiple emissions mitigation pathways showed that in two native forest types in NSW, sustainably managed wood production forests can produce better carbon abatement outcomes than unharvested forests.⁴ Sustainably managed forests retain their carbon stocks over time, and the long-lived wood products derived from them retain carbon for even longer periods. These forests not only store carbon, they support the livelihoods of local communities and our economy.

² Cooperative Research Centre for Forestry (2011) *Technical Report 215, Biodiversity outcomes from eucalypt plantation expansion into agricultural landscapes of southern Australia: A review*

³ Dennehy, K (2014) *Using more wood for construction can slash global reliance on fossil fuels*

⁴ Ximenes, F, George, B, Cowie, A, Williams, J & Kelly G (2012) Greenhouse gas balance of native forest in New South Wales, Australia. *Forests* 3: 653-683

Catchment water yields

Melbourne draws its water from forested catchments in the central highlands of Victoria. Approximately half of the total catchment area is covered by mountain ash forests, which produce 80% of the mean annual streamflow due to high rainfall in the region.

Long-term research in these catchments has indicated that thinning regimes in mountain ash forest could increase water yield by up to 36%.⁵ Therefore, forest management is a potentially vital component of water supply augmentation strategies. This may become increasingly important as precipitation and streamflow decrease in a changing climate.

Priority 7: Drive the expansion of green infrastructure and use of native species, to help create liveable and climate-adapted communities that include opportunities to connect with nature.

VAFI supports the development of “green” infrastructure in urban areas but stresses that development of this nature should not be limited using living vegetation. The use of timber and high-performance engineered wood products in the construction of green infrastructure will generate benefits that contribute the objectives the plan to create urban communities where people are more connected to nature. Benefits from using wood products include:

- Reducing greenhouse gas emissions from construction (see above);
- Positive effects on mental and physical wellbeing from timber in the built environment;⁶
- Environmental services and benefits maintained by sustainable forest management (see above).

Priority 12: Investigate options for significantly increasing incentives for private land owners to permanently protect important habitat on their land

Private landowners have a crucial role to play in managing and maintaining biodiversity on land outside the reserve system. However VAFI has noted, in a recent submission to the review of native vegetation clearing regulations, that the current regulatory framework for native vegetation does not address historic and continuing overall decline in native vegetation condition and extent on private land.

The regulations, as they are currently applied, encourage land owners to view existing vegetation as a liability rather than an asset. In 2007, an ABS survey of landholders with native vegetation on their land reported that 22% only retained vegetation because it was too expensive or difficult to clear and 28% said they would have cleared if there were no restrictions on doing so.⁷ While survey results are not available specifically for native forest in Victoria, this report suggests that a large proportion of native vegetation owners do not see any economic value in their vegetation.

⁵ Hawthorne, S, Lane, PNJ, Bren, L & Sims, N (2013) The long-term effects of thinning treatments on vegetation structure and water yield *Forest Ecology & Management* **310**:983-993

⁶ *Wood: Housing, Health Humanity* (2015) Planet Ark

⁷ ABS (2007) *Cat. no 4620.0 2004-05 (Reissue) Natural Resource Management on Australian Farms*. Australian Bureau of Statistics

Priority 12 (cont.)

This attitude creates a danger that vegetation will be degraded by inappropriate fire regimes, failure to control weeds and other outcomes that cannot be prevented by regulation. This view among landholders is likely to be exacerbated by the native vegetation clearing regulations acting to prevent active investment and management of large areas of private native forest for environmental and economic outcomes.

However, a regulatory system that allowed sustainable harvesting, compliant with the Code of Practice, would allow landholders to invest in the value of their resource while also delivering a range of environmental benefits.

VAFI recommends that DELWP consider expanding the scope of the Biodiversity Plan to encourage landowners engage in ecologically appropriate forest management for sustainable harvesting that will complement environmental stewardship schemes.

Priority 19: Deliver an effective, best-practice regulatory and legislative framework to protect our habitats for future generations and support the achievement of *Protecting Victoria's Environment – Biodiversity 2036*

Native forests in Victoria are governed by separate regulatory systems. The native vegetation clearing regulations for private land effectively prevent forest management (see above), placing extra strain on public forests for resource use.

The full extent of unavailable resource on private land is poorly documented but private native forests represent approximately 13% of all native forest and, during the period 1997-2007, supplied an average of 10% of the total volume of sawlogs in Victoria.⁸ Private forests therefore have the potential to sustainably supply a proportion of demand for wood product if governed consistently across public and private land tenures.

The positive outcomes from such a system in Victoria would include:

- Consistent, cross-tenure management of harvested native forests;
- Consistent application of management rules across the state;
- Improved strategic management of biodiversity values at the state level;
- Allowing harvesting from private land would reduce resource pressure on public forests; and
- Allowing timber harvesting from private forests would encourage investment in native forest management and plantation creation, leading to increased environmental benefits.

⁸ Rural Industries Research and Development Corporation (2009) *The Role, Values and Potential of Australia's Private Native Forests*. RIRC Publication 09/049

Priority 19 [cont.]

An example of a similar approach for forestry was outlined in the 2014 independent *Review of Biodiversity Legislation in NSW*. The review concluded that there should be a broader and deeper application of biodiversity offsets in NSW, but that forestry on private land represented a low risk activity. The report recommended that the NSW government should “review regulatory arrangements for timber harvesting on private land as part of a separate process that does not regulate the harvesting of native timber as a form of land use change”.⁹

VAFI recommends that commercial forestry should be governed by a state-wide, cross-tenure regulatory system for private and public land under the Code of Practice.

⁹ A review of biodiversity legislation in NSW Final Report (2014) *Recommendation 7*