I wish to comment on two aspects of the draft policy

1  Sustainable logging practices on private land

The policy seems to treat sustainable logging practices on private land in the same way as permanent clearing for agriculture, residential development etc - with the requirement for offsets etc. This is inconsistent with the goal of no net loss i.e. there is no net loss of forest area with sustainable forestry operations just a change in forest structure. There should be no requirement for offsets in this situation.

There are two broad types of sustainable logging practices which can be undertaken on private land - thinning and clear felling with seed regeneration or replanting.

Whilst thinning makes some changes to the forest structure at a coupe level it actually increases the diversity of the forest at a large scale level and that diversity is important for a healthy forest. In fact in some cases thinning improves the habitat for threatened species such as in the case of the long footed potoroo in eastern Victoria - which thrives in the thinned stands. The same type of change in forest structure occurs over wide areas due to wildfires which are a natural feature of native forests. The wildfire removes or damages much of the understory and changes the structure of the forest but actually improves diversity in the long term and over a broad area usually far in excess of any thinning coupe.

Clear felling with regeneration has a more significant impact at the coupe level and in the short term but also contributes to the diversity of the forest at a broad scale. As the forest regenerates the diversity can actually improve as different species emerge as a result of the disturbance. For some forest types it also mimics the impact of wildfires where the complete stand is killed and a new regenerating forest grows. As in the case of thinning this "natural disturbance" and change to the forest will usually be over areas much larger than a logging coupe.

2  The application of the policy at a State level

The percentage of forest cover in Victoria varies across different parts of the State. Clearly the eastern part of Victoria has a far higher percentage of forested area than the western half and also has significant areas of private forest. This private forest can be managed by landowners on a sustainable basis and provide some income to the owner just as the cleared parts of the property provide income. In assessing proposals for sustainable forest operations on private land the area and diversity of surrounding forest areas should be taken into account. The current regulations are a blunt instrument as they take no account of local circumstances.

Summary

1  Sustainable forestry practices on private land do not reduce the area of forest cover

2  Sustainable forestry practices actually increase diversity of the forest at a large scale level in a similar way to the effects of wildfire on diversity

3  Sustainable forestry practices should trigger no requirements for offsets

4  In assessing sustainable forestry practices on private land it is important that the area and diversity of the forest cover in the local area be taken into account rather than one set of rules for all of Victoria