To Whom it may concern.

I wish to make a submission regarding regulations for private timber harvesting to occur on private land. I have been working at trying to get a thp approved for a friend who has 900 acres of native forest, it has been harvested before and partly cleared, so it is not virgin forests. I wish to make the following suggestions:

* Speaking from experience, it has been months now, I have downloaded various documents and spent a lot of time and we are still no closer to a result, the outcome from the report from delp is basically that we still have to do a lot of work and then there is still no guarantee that we can get approval for selective harvesting. ( and this is before we even deal with the shire who don’t understand the process of selective harvesting)

* The reports basically assume that we will be destroying the land where the selective harvesting will occur and this is simply not the case, it is simply thinning from above, leaving habitat trees and intermediate trees to grow on, surely the process should be simplified to account for selective tree harvesting, a proven method in mixed species forests. Why can’t the process follow what Vicforests does in selective harvesting? I have not heard that they need to have offsets like we are been asked to. Why too, do government thin red gum forests? ( they do it because thinning improves forest health!) , if private landholders are required to offset land, why then does government not need to offset land? Is it not more so that thinning improves forest health rather than damages
forest health? And this is the reason government will use when they justify thinning red gum forests.

Seriously, I spent hours at Creswick learning how to improve forest health by thinning using different methods like basal area and stocking rate, and here is delp telling us we need an offset and to jump through all these hoops. It just defies belief except to come to the conclusion; no exemption has been made for genuine forest management by qualified foresters, because the government don’t want anyone to be actually able to undertake these activities, it has nothing to do with if the activity contributes to ‘net loss’ or not, it is simply wrong and needlessly blocks forest managers from being able to make an income for private landholders.

* What is really needed is people to police harvesting on private land, people with knowledge of how it should be done and who have enough authority to fine contractors etc. who do the wrong thing, surely Vicforest forest officers could be hired and paid for as part of the process, after all they work in the industry and know best practice.

* Expecting shire personal to be experts on forestry is asking to much, leaving them to refuse to allow harvesting because they fear the damage to the environment when as I say thinning properly will improve forest health and provide income for the landholder.

* Legislating private native forest harvesting like this will simply cause landholders to forget even contemplating the activity at all. It is just too complicated, and we assume that we have to pay for someone to come out and do habitat assessments? This to makes it
less viable, it is double standard, one rule for government, one rule for private landholders.

* When delp do burns in state forest, a lot of trees are felled, (and this is right,) but have you considered trying to abide by your own rules?

* The exemption where a private landholder can only access trees up to a certain diameter for private use is to restrictive; it makes criminals out of decent people. So we fall twice as many trees to get the product we need to appease the rules, when one tree may of sufficed that was outside the size allowed under that exemption, madness.

* I have witness clear-felled plantations that have terrible erosion (at may have been fixed by now) because tracks were not properly barred the shire was made aware but nothing happened because no one had any power to do anything, the system should be changes so that this can’t happen.

* If timber harvesting can occur on public land without all this then why not on private land? Why can’t Vicforests be put in control of approving/not approving harvesting plans using the same criteria they use?

* Foresters and contractors should be consulted in the process, they should be actually sought, not in this way where if you happen upon this site you get to contribute.

* Finally I think the process should be quick and simple but tightly policed by people who know what they doing, this is the best way to protect the environment and enable landholders to make some use of their forests. There should be a properly managed ‘forestry only’
policy for these matters. It should be affordable and there should be people employed to manage it, who are foresters, not anti-forestry types, the shires should be kept out of these decisions largely, they cannot be expected to be up with forestry concepts, they are to easily swayed by ant forestry groups.
To Whom it may Concern:

Submission #2

While my attempt to have my clients permit approved is proving very costly in time and defiantly money for her more than me, I am again utterly astounded that I spent all those years at the school of forestry Creswick, where we were taught that forest health and basal area went hand in hand, and that basal was a great tool in gauging forest health and management, and that mixed species forests do not readily self thin, but that before white settlement our forests had a much lower basal area than they do now, and in order to improve forest health we should look at this.

Yet try and match this with your guidelines, and you will end where we are now, we are asked 'how many trees do you want to remove': seriously is this the right question to ask? why not ask: what is the basal area of the forest? & what do you intend to bring the basal area of the forest to? (and if this falls into an acceptable level of basal area and habitat trees are marked and retained then don't bother asking how many trees we want to remove and then apply an offset requirement that makes it all unviable!) This is exactly why for private native forestry we need a totally different set of rules, that is based on 'forestry' where forestry techniques are adhered to. I totally agree that the government need to regulate clearing, but clearing forests and native forestry are not the same things. Please bring some people in to this who understand native forestry! qualified foresters, who work in this field, if you don't know any ring me and I will give you some details, we can do some field trails, but please don't make us endure this current system, it is unfair and it doesn't 'save the forest'.

Yours Faithfully