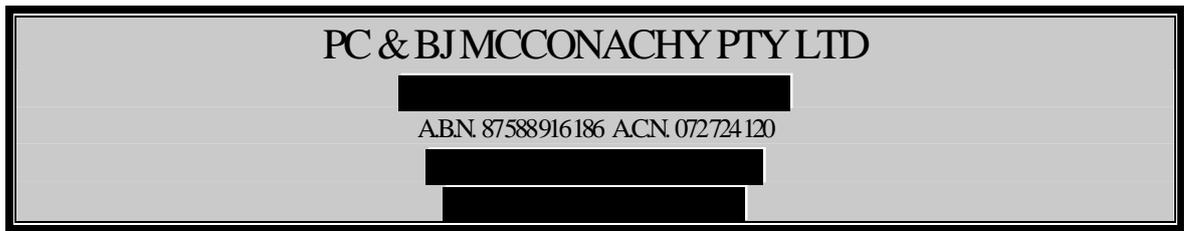


POST/EMAIL SUBMISSION DETAILS		
Date Received	03/03/2017	
Name	[REDACTED]	
Organisation	PC & BJ McConachy Ptd Ltd Firewood & Harvesting Supplies Pty Ltd McConachy Logging & Earthmoving Pty Ltd	
Email	[REDACTED]	
Postcode	3797	
Privacy Options	I am making this submission on behalf of an organisation , and understand that it may be published and will include the name of the organisation unless otherwise requested	
Privacy Statement Correct?	Yes	
Privacy Collection Notice Read?	Yes	
Submission Type	Forestry	
Previous engagement in review?	Info session 2015	Yes
	Workshop 2015/16	
	Targetted consultation	
	SRG	Yes
	Written submission to CP?	Yes
Other? Describe		
Will changes improve function of regs?	No	
Reasons	No- please see supporting documents	
Implementation issue with proposed changes?	Yes	
Reasons	Please refer to supporting documents	
Guidelines – guidance or clarification needed?	Yes	
Details	Please refer to supporting documents	
Terms to include in guidelines glossary?	Yes	
Details	Please refer attached	
Subscribe to e-newsletter?	Yes. Please send information updates to my email address	
Other comments	Our land has been used for timber production in excess of 120 years, we request you take careful consideration and use this consultation period to possatively assess Private Native Forest for timber production, repeating this is not a clearing operation, there is "No Net Loss" of native Vegetation under the native Vegetation Framework (pre 2013) Sustainable timber production rules, regulations and supervision are utilised. Local employment, economic values are just to name a few values that must be considered. The Federal Government ATO recognise that Forestry operations are lawful and primary production farming crop, is not classed as land clearing.	
Written submission provided?	Yes – attached	



6/3/17

We are respectfully submitting our opinion and professional input into the Native Vegetation Clearing Assessment Guidelines, Draft November 2016

Our family timber company, made a submission in 2016, on the Native Vegetation Clearing Regulations. The points previously raised, for discussion, remain relevant, as the draft clearing assessment guidelines have obviously been built onto the previous documents and the current unworkable processes (from 2015 further forward), rather than reviewing and reconsidering an effective process: similar to that which existed pre 2015.

Our previous submission summary reads:

In summary there is 'NO NET LOSS' of native vegetation when the rules employed by the Native Vegetation Framework (pre 2013) SUSTAINABLE TIMBER PRODUCTION rules, regulations and supervision are utilised.

In addition to our previous points, we bring the following points, referenced to the relevant section of the November draft, to the attention of the Native Vegetation Team.

1.3 Describing the value of native vegetation – as DELWP is a determining referral authority for many native vegetation planning applications, it is misleading not to include a more complete suite of values, under, “Other values of native vegetation” in Table 1. It is imperative and inclusive, to recognise that Victorians value native vegetation for values, far broader than, “biodiversity value &...Other values”, currently limited to, “ land and water protection, identified landscape values and Aboriginal Heritage.” Many Victorian’s rely and as a result, value native vegetation, on both public and their own private land, for fuel, recreation, personal wellbeing and in many cases, such as our own, **to earn an income, provide local employment and to contribute more broadly, to the Victorian economy through timber production.**

2.1.1 Native Vegetation Precinct Plan (NVPP) – is an incorporated document in a planning scheme that requires a planning scheme amendment, by the ‘responsible authority’ (shire). This is a process that must be endorsed by council. The process of incorporation cost tens of thousands of dollars. This detail is not clear in the draft document and as a result, this is a misleading potential option for private property owners looking to lawfully remove native vegetation from their property.

A NVPP is not a realistic option for private property owners who are anticipating utilisation of their native vegetation through timber production.

2.1.2 Property Vegetation Plans (PVP) - It is noted, with frustration and a signal that **transparency is not an aim of this process**, the detail of what a, Property Vegetation Plan (PVP), under this section of the draft for review, **is not included**. When an inquiry for the detail of a PVP, was made on our behalf, we received advice that the template, as in the draft’s mention, “ A PVP should be prepared in accordance with the relevant PVP template”, page 6 of the draft document, **was not available**. It is a very

disturbing omission from the review process, when for our industry, the PVP appears to be offered as a carrot to a sensible pathway for timber production, rather than vegetation clearing: **two mutually exclusive processes under Victorian law.**

The document draft reads, “Any permit granted when a PVP applies has a ten year validity”. This continues to highlight the issues raised in our initial submission. Lawful timber production does not work to a 4 year (current ‘standard’ planning permit validity) or a 10 year “validity”. Similar to a farmer changing crops to suit a market or to adjust to seasonal conditions, timber production must have flexibility for markets, seasons, and changing economies. Silviculture, the science of timber production, works on timeframes of up to 80 years, dependant on species and human-made factors. Therefor a 10 year ‘validity’, while seeming like a lengthy compromise falls severely short of sustainable native vegetation timeframes utilised in timber production.

For example, if ‘shelterwood’ is the silvicultural system used in timber production, the first harvest removes 50 % of the trees for timber in a coupe (but not necessarily the whole property); approximately 20 years later, the other 50% should be harvested. It is unjust to suggest an administrative tool, such as a permit should stop a property owner from the confidence of continuing to plan to earn an income from their ‘scheduled’ timber crop, as a result of ever-changing state government policies. The integrity of the native vegetation is not compromised while the property owner continues to utilise other areas of timbered land, while waiting to return to the original operational area.

Section 4. Assessment Pathway – it is still grossly unclear why timber production appears to still be assessed as permanent removal of native vegetation and requires offsets to be calculated. The state of Victoria has a native vegetation framework that was assessing and administering timber production on private land, ensuring clearing was not occurring as a result of sustainable timber production. For timber production to be impacted by the approach of offset requirements, still remains unlawful and unjust for the reasons set out in our original submission.

In Conclusion

Once again, we extend the invitation for relevant DELWP Native Vegetation policy staff to arrange a field visit to our current operations and properties. We also strongly suggest relevant biodiversity staff engage with experience forest industry staff, many of whom are still employed within DELWP, to ensure the draft can be better informed to reflect the science and legal requirements that exist for the security of sustainable timber production from Vitoria’s native vegetation.

To get the most complete perspective of biodiversity, vegetation management and timber production we would also suggest DELWP engage in detailed conversation with Greg Hollis of Baw Baw shire. Greg has a shire perspective, based on an extensive state government career is the Victorian regional ‘forest conservation’ service in all its previous incarnations.

Sincerely,



Managing Director

PC & BJ McConachy Pty Ltd