Submission in response to

VEAC
Central West Investigation
Draft Proposals Paper

December 2018

Section 1: Governance

Section 2: Social

Section 3: Economic

Section 4: Environmental

Ms Loris Duclos B For (Hon)

Section 1: Governance

The Victorian Public Sector Commissioner states that;

- *Good governance supported with a solid structure is integral to the performance of public entities.*
- *Good governance strengthens ministerial, government and community confidence in a public entity.*
- *It also has direct benefits for public entities themselves.*
- *It helps public entities ensure they maintain and enhance their reputations. It also assists public entities to respond effectively and efficiently to changing demands.*
- *In practice, a public entity achieves good governance when those who have a governance role to play clearly understand their role and related responsibilities, and the nature of the relationships between the various parties.*
- *They then take the appropriate action to fulfil those responsibilities and meet mutual expectations*

https://vpsc.vic.gov.au/governance/governance-structure-and-roles

In my opinion the VEAC Central West Investigation has not been conducted in a manner that has demonstrated "Good Governance". This investigation has not been an objective and orderly land use assessment that Victorian taxpayers would expect from a state government. A number of dubious procedural matters have adversely influenced the outcomes of this process and resulted in a very low level of public confidence in VEAC.

1.1. Boundary of the investigation area

The Minister, Mrs D'Ambosio, should explain why she chose the boundary of the Central West Investigation area. There is nothing orderly about the three blocks that make up the Central West Investigation area (Map1), these areas are distinct, and the boundaries do not fit within any appropriate regional, landscape, or ecological context. The hotchpotch of areas included in the Central West Investigation totally disregards Recommendation 12 of the Remnant Native Vegetation Investigation (VEAC 2011) which states assessment of protected areas would best be done as consolidated regional investigations.

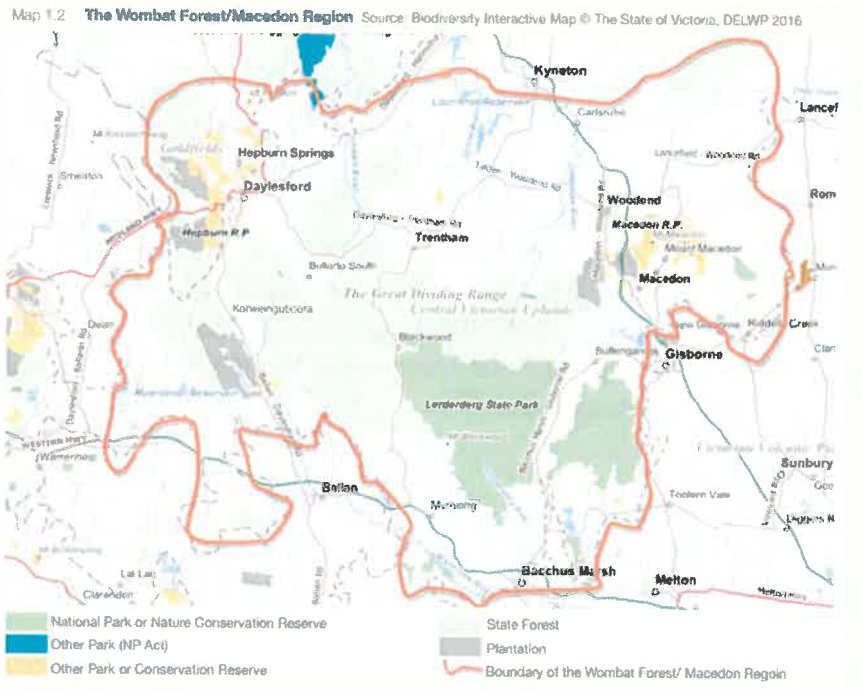


Map 1: VEAC Central West Investigation boundaries (p.12 Central West Investigation Draft Proposals Paper)

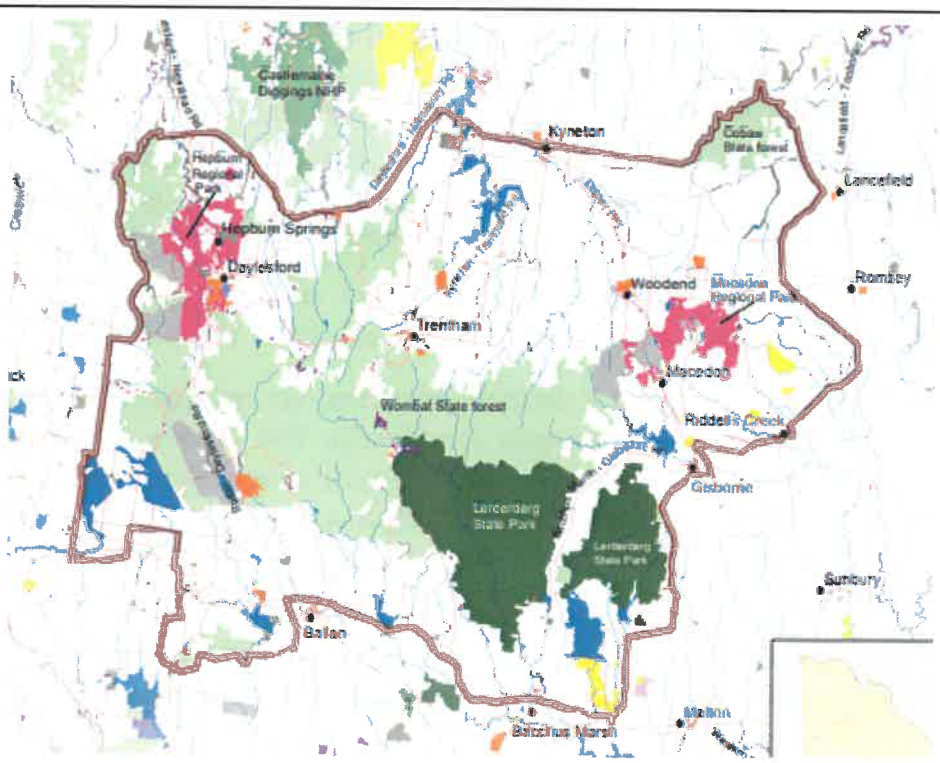
As shown in Map 2 & 3, the only common factor with the boundaries in the Central West Investigation area is they reflect a campaign to have these areas declared National Parks by a coalition of groups associated with the Victorian National Parks Association (VNPA). I believe that the Victorian public expect that the boundaries for

environmental assessments should be based on relevant environmental factors and not simply reflect areas that are a focus for political lobby groups.

Map 2: Boundary drawn by in a report prepared for Wombat Forestcare, The Wilderness Society and the Dara Foundation (p.4 Conservation Values of the Wombat Forest and Macedon Region http://www.wombatforestcare.org.au/documents/WFMRDraft2.pdf



Map 3: VEAC Boundary of Wombat Macedon area (p.12 Central West Investigation Draft Proposals Paper)



1.2 Independence of the VEAC Council, highly questionable.

Part 2— Section 5 of the Victorian Environmental Assessment Council Act 2001 states that;

The objectives of the Council are to—

> *(a) provide* ***independent*** *and strategic advice to the Government of Victoria on matters relating to the protection and ecologically sustainable management of the environment and natural resources of public land; and*

In my opinion VEAC is far from "independent" and this lack of independence is reflected in the advice given to government. There is a gross over representation of individuals in various roles and positions within VEAC who have connections to the Victorian National Parks Association (VNPA) and or parks management in Victoria. The stacking of VEAC by VNPA and parks management means that advice to government primarily reflects the views and opinions of this interest group rather than providing truly 'independent' advice. This lack of objectivity is particularly notable in the Central West Investigation and occurs at every level of the process where it can be demonstrated that the over representation of VNPA and parks management has resulted in highly subjective outcomes.

The VNPA is an independent, non-profit, membership-based group, which exists to protect *Victoria's natural environment and biodiversity through the establishment and effective management of national parks, conservation reserves and other measures.* (https://vnpa.org.au/about/vision/). As disclosed in their name the main purpose of VNPA is to lobby for more National Parks and other reserves in Victoria. Whilst I believe it is appropriate that VNPA are represented in some land use decisions the problem has occurred as they have been able to corrupt the process by dominating and excluding other legitimate stakeholders and preventing genuine community representation.

In 2014 Victorian National Parks Association (VNPA) released their strategic planning document "Nature Conservation Review" (Booth 2014) this is supposed to guide VNPAs work for the next ten years. The VNPA expert reference group for this strategic document included two current and as well as , the chair of the Central West Investigation Community Reference Group.
is quoted in the VNPA report and acknowledged for his advice on the terrestrial chapter.

Before joining the VEAC the , and , had senior roles in Parks Victoria and was a Parks Victoria volunteer.

Some people on the Community Reference Group that are not associated with VNPA have complained there has been no meaningful consultation. The group met twice, were delivered information by VEAC staff and if they raised issues were told to put it in their submissions.
from the Prospectors and Miners asked for a copy of the minutes from these two meetings and was told no minutes were taken.

Most shocking, in terms of "Good Governance " is the appearance that those within VEAC with an interest in VNPA have colluded to ensure their associates had a majority on the Central West Investigation, Community Reference Group. Resulting in the corruption of what should be an independent and broadly representative process.

CENTRAL WEST COMMUNITY REFERENCE GROUP RELATIONSHIPS WITH VNPA		
CHAIR:		**VNPA Expert reference group** (see above)
	Bushwalking Victoria (Ballarat Walking Club)	**Bushwalking Victoria is a Member of VNPA**
	Central Victorian Biolinks Alliance Inc.	**, long term involvement various roles, donator. Co authored with**
	Four Wheel Drive Victoria	No
	Macedon Ranges Shire Council	**volunteer EV, Shire is Project Partner (VNPA 16/17 annual return)**
	Prospectors and Miners Association of Victoria	No
	Pyrenees Shire Council	No
	Central Victorian Apiarists Association	No
	Victorian Association of Forest Industries	No
	Victorian Farmers Federation	No
	Victorian National Parks Association	**Employee, Executive Director**
	Wellsford Forest Conservation Alliance	**Greens candidate Bendigo Project partner**
	Wombat ForestCare	**Project partners, substantial funding through DARA foundation to write reports**

Table 1: Members of the VEAC Central West Investigation and their association with the VNPA

1.3 Some VEAC members and staff appear to not properly understand their roles as public servants.

The Victorian Public Sector Commissioner makes it clear that *"good governance" is achieved when those who have a governance role to play clearly understand their role and related responsibilities, and the nature of the relationships between various parties.*

During the State government election, and whilst in caretaker mode , made false and very misleading statements which were quoted in the Hepburn Advocate. In the article stated that "*In 1980 there were about 100 threatened species in the Wombat, now there are 375. So there is a real biodiversity crisis happening*". These biodiversity figures are simply not true. The Central West Investigation Draft Proposals Paper provides a list of 394 threatened species which have been modelled across all three areas under investigation, the investigation does not consider the Wombat Forest as an isolated unit. Included on the threatened species list is 160 species that have never been recorded in the Victorian Biodiversity Atlas in any part of the Central West Investigation area. There are 178 species listed as threatened for the entire Wombat/ Macedon area which includes cleared farm land and other areas with threatened Ecological Vegetation Communities outside the Wombat State Forest. I'm not sure where got her information from, but what she said is factually incorrect, grossly different to the information presented in the VEAC Draft Proposals Paper and quite misleading to the public.

also seriously breached caretaker convention guidelines with his comments published on the front page of a regional newspaper (Midland Express 13th Nov 2018). The article entitled "*Forest fears furore*", has strong political overtones, it is important to note that the seat of Macedon is a marginal seat with several candidates who ran on a platform of "no more national parks" and the Victorian Greens running on a platform of "more national parks. In the article made comments about Parks Vic using control burns and ecological thinning to reduce tree density which were simply not factual. Parks Vic have 2 long term trials to assess the impacts of ecological thinning, one in the box ironbark forests of Central Victoria and the other in the River Red gums at Barmah Forest in the Murray River region. Researchers state *It is anticipated that the establishment of the ecological thinning trial (Phase I), is the beginning of long-term monitoring, as effects of thinning on key habitat values may not be apparent for up to 50 years or more* (P. Piggot 2010). is not involved with Parks Vic or its management and what's more, the future actions proposed by are not current Parks Vic policy. His comments amount to introducing new policy for Parks Vic, and this from a public servant during an election period, whilst in caretaker mode.

In her letter (19 Sep 2018 Wimmera Mail Times) Minister D'Ambrosio said that "feedback could be given at one of the drop-in sessions happening across the region".

During VEAC "Community drop in sessions" it was noted by a number of people that some VEAC staff particularly didn't take any notes and didn't appear to be listening to what people had to say. How can people be sure that the views they expressed have been considered in the Draft Proposals Paper????

Section 2: Social

2.1 Commitment to consider socio economic impacts not met.

In the Governments response to recommendations in the VEAC Statewide Assessment of Public Land it is stated that;

> *The government accepts Recommendation R20(c), recognising that part of the Central Victorian Uplands are being investigated through VEAC's Central West Investigation, which is currently underway. VEAC will be requested to undertake these investigations, noting that, when developing recommendations, VEAC is required to consider the full range of land uses and perspectives, including socio-economic impacts.*

There is absolutely no meaningful discussion around socio economic impacts of the Central West Investigation recommendations put forward by VEAC in their Draft Proposals Paper. Section 8 of the Draft Proposals Paper briefly outlines some of the changes resulting from the recommendations but does not go into any depth about the social or economic impact of these changes.

VEAC engaged Consultants, Gillespie Economics, who prepared the Central West Investigation Area Socioeconomic Profile. The consultant simply uses ABS census data for population, place of work and housing to identify the socioeconomic profile of the Local Government Areas in which each of the Central West Investigation areas are located. The data for each Local Government Area was then compared to demographic data for the rest of Victoria. This very simple type of socio economic profiling uses Local Government Areas as a rather poor surrogate for the study areas. It must be made clear that profiling does not equal impact assessment, and in this case has certainly not identified those within the community who are most impacted by decisions or how impacts could best be mitigated. The review of census data is nothing more a small preliminary step in a socio economic impact assessment.

2.2 RFA socio economic assessments ignored by VEAC

The Governments response to recommendations in the VEAC Statewide Assessment of Public Land also says that;

> *The information made available through the investigations will be incorporated into broader processes such as the Regional Forest Agreements and forest management planning.*

There was a very in depth and well-designed social impact assessment during the West Victorian RFA which covered all but the Wellsford area of the Central West Investigation. Did VEAC not look at RFA documents? It is an absolute joke to think that the very inadequate VEAC Central West Investigation socio economic profiling could in any way build on the RFA Comprehensive Regional Assessments (CRA).

The West Victoria RFA, SOCIAL ASSESSMENT REPORT December 1999 (Published by the joint Commonwealth and Victorian Regional Forest Agreement (RFA) Steering Committee © Commonwealth of Australia 1999) published the results from extensive community consultations including a telephone survey aimed at identifying;

- *community attitudes towards the management and use of forested lands; and*
- *the level of community dependency on forested lands within the West RFA region.*

In addition, the study sought specific information on the community attitudes towards the management and use of National Parks and State forests within the study area.

Table 2.22 Recreational usage of State forest in the West region, 1994–95

Forest management area	Day visitors	Campers	Disperse[1]	Total number of visitor days
Horsham[2]	46 000	145 000	2 000	193 000
Midlands	223 000	22 000	160 000	405 000
Otway	24 000	15 000	16 000	55 000
Portland	35 000	2 000	33 000	70 000
Total	328 000	184 000	211 000	723 000

[1]'Disperse' usage of State forest is not specific to a certain site.
[2]Figures for the whole FMA.
Source: Read Sturgess and Associates' (1995)

Amongst those respondents who had visited a State forest within the last year, 32% indicated they visited State forests once a month or more (Table 3.27). The frequency of use of State forests is in marked contrast to the use of National Parks where the majority of respondents were found to have visited National Parks only once during the last year. Clearly while a greater number of people have visited a national park within the last year when compared to a State forest, the frequency of use of State forests is significantly higher than that of National Parks.

Table 3.27 'How often have you visited these State forests?'

Response	Frequency	Per cent
Once a month or more	96	32.1
Once every three months	57	19.1
Once every six months	66	22.1
Once a year	80	26.8
Total	299	100.0

Note: Eleven respondents did not answer this question.
Source: EBC (1999)

Table 2: Recreational usage of State Forest in the West region, 1994-95
Table 3: How often have you visited these state forests? (From West Victoria RFA, Social Assessment Report, 1999)

The above tables exerts from the West Victorian RFA Social Assessment Report are most pertinent to the Central West Investigation as they clearly show that State Forest in the Midlands Forest Management Area (FMA), which includes the Wombat, Macedon and Mt Cole areas, have a very high rate of dispersed recreational use. The RFA Social Assessment found that whilst more people visit National Parks they usually only visit once a year or less but state forest usage is significantly higher because s a high proportion of people who use state forest visit several times a year.

2.3 Community engagement

2.3.1 Notification of Investigation

The Notice of Investigation appeared as a small advertisement in local newspapers, there was no attached map to catch the eye of a reader. Many people who live in around the forest have complained that they did not find out that the Central West Investigation was underway. If a neighbour on private land was proposing a change of land use they would usually have to notify their neighbours. VEAC should have done a mail out to all properties within 500m of the boundary of public land under investigation.



VICTORIA State Government

VEAC

Notice of Investigation

Central West Investigation

The Minister for Energy, Environment and Climate Change has requested the Victorian Environmental Assessment Council (VEAC) to carry out an investigation into public land in the vicinity of the Wombat, Wellsford, Mount Cole and Pyrenees Range forests. All public land within the investigation area will be assessed including parks and reserves, state forests, stream frontages, unused roads, water production areas and unallocated Crown land.

The purpose of the Central West Investigation is to:

(a) identify and evaluate the condition, natural and biodiversity values and cultural, social and economic values and the current uses of public land in the specified area; and

(b) make recommendations for the balanced use and appropriate management arrangements to conserve and enhance the natural and cultural values.

VEAC will work in partnership with all Traditional Owner groups with interests in the investigation area, including the Dja Dja Wurrung Clans Aboriginal Corporation which has a Recognition and Settlement Agreement (2013) covering a significant proportion of the investigation area.

A draft proposals paper and a final report are to be prepared, allowing for two public submission periods. The Council must report on the completed investigation by March 2019.

The full terms of reference including a map of the investigation area is available from www.veac.vic.gov.au or by calling VEAC on 1800 134 803.

SUBMISSIONS INVITED

Written submissions are invited from interested groups and individuals for consideration in the development of the draft proposals paper. You may make an online submission via VEAC's website at www.veac.vic.gov.au or send your written submission to VEAC by post or by email (see contact details below).

Victorian Environmental Assessment Council
PO Box 500, East Melbourne, VIC 3002
Email: veac@delwp.vic.gov.au

This submission period closes on Monday 21 August 2017.

Submissions will be published on the VEAC website after the close of the submission period. All submissions will be acknowledged.

If you do not wish to make a submission at this stage you can register your interest in the investigation online or by calling VEAC. There will be a further opportunity to make submissions following publication of the draft proposals paper in mid-2018.

See the VEAC website for details about community forums to be held in the investigation area over the coming weeks.

www.veac.vic.gov.au
1800 134 803

2.3.2 Community drop in sessions

At the community drop in sessions some VEAC members and staff have argued with community members and dismissed their views and some didn't even bother to take notes. Others took oral submissions from community members but the names of those who gave oral submissions have not been documented. VEAC need to realise that they must engage with ALL of the community and this includes people with disabilities and poor literacy skills, they have a right to have their views noted even if they aren't able to provide a written submission.

At the first round of drop in sessions in August 2017 I raised very legitimate concerns about the need to thin large areas of suppressed forest in the Wombat State Forest to improve the forest structure and carbon storage capacity. I pointed out how lucky we were to have the Wombat Forest Flux tower right on our doorstep. This long-term ecosystem research site investigates the complex ecosystem processes of the carbon, water and nutrient cycle in a dry-sclerophyll

forest ecosystem,. None of this information made it into the Draft Proposals Paper even though the Wombat Forest Flux site represents cutting edge science aimed at informing the management of Australia's forest in a changing environment.

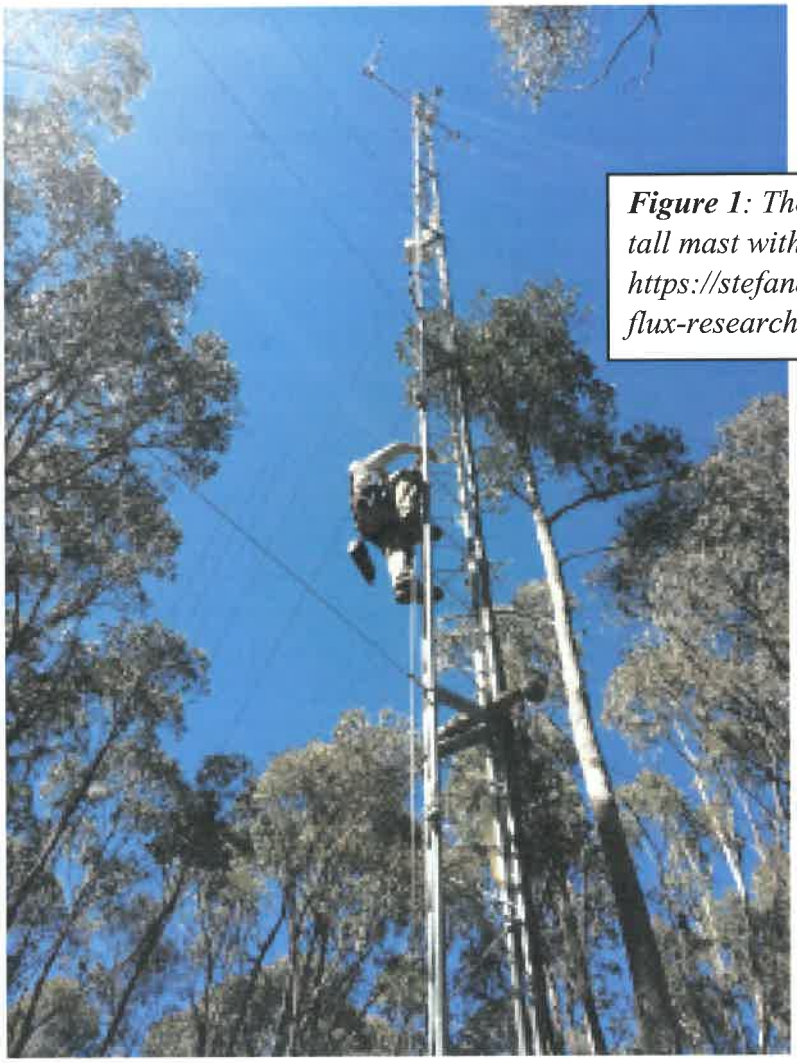
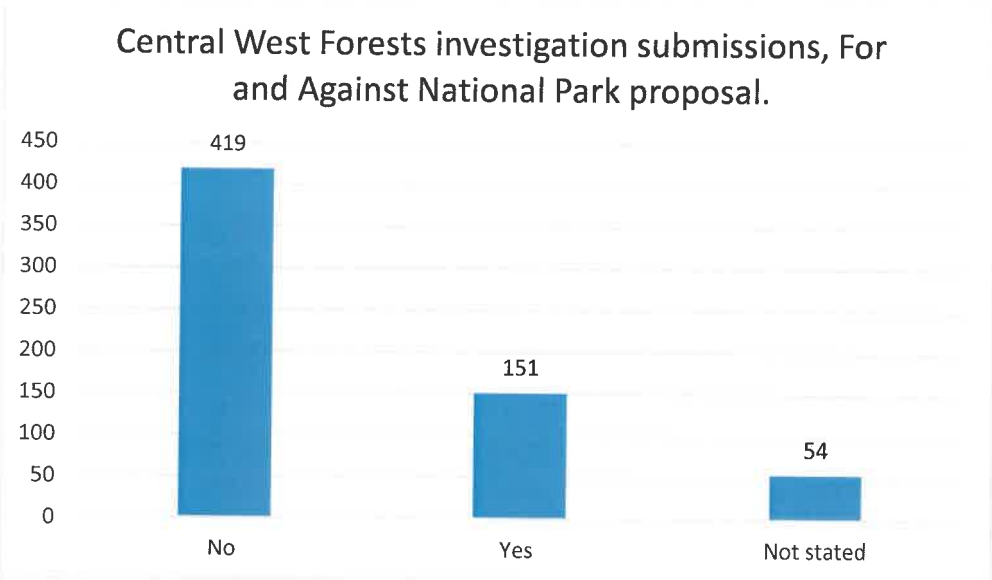


***Figure 1**: The Wombat Flux tower is a 35 m tall mast with instruments located at 30m https://stefanarndt.wordpress.com/wombat-flux-research-site*

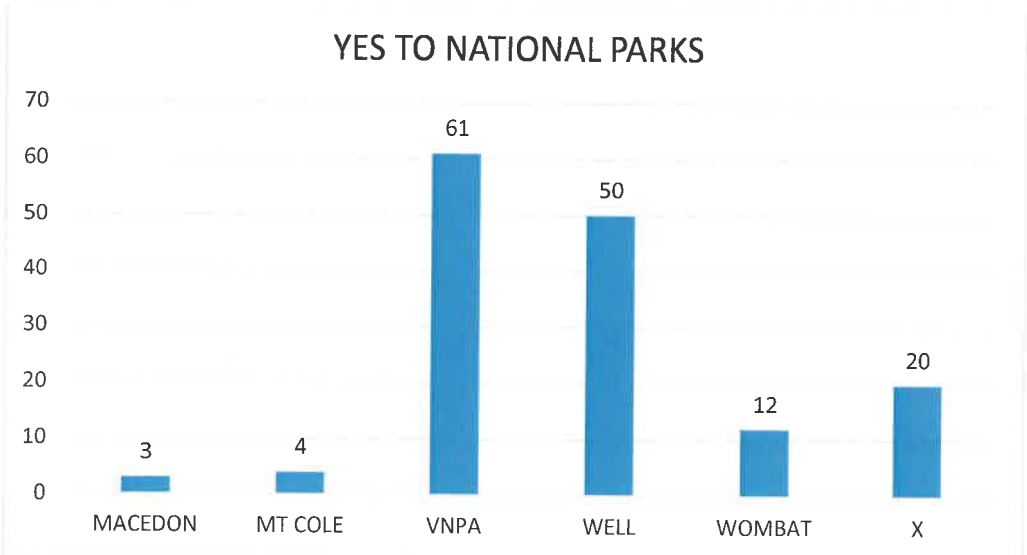
2.1.3 Submissions

VEAC received 640 written submissions in the first consultation period and these are supposedly reflected in the Draft Proposals Paper. I have read every submission and find that the submissions have been summarised and reported in a most misleading manner in the Draft Proposals Paper. For example P.52 of the Draft Proposals Paper states "*Approximately 60 submissions opposed the creation of new national parks or other conservation reserves with most referring to the investigation area in general*". My analysis of submissions shows that there is much greater opposition to the National Park option than reflected in the Draft Proposals Paper. As shown in the graph below, I simply sorted all the submissions into 3 groups. The "No" group made up of those submissions that explicitly state that they do not want national parks or the cessation of activities that are currently not permitted in Victoria's National Parks. The "Yes" group, made up of those submissions who want National Parks or better protection that includes cessation of current uses. The "Not Stated" group, those submissions that didn't state a clear opinion either way.



The Draft Proposals Paper does not examine the yes vote to identify where there was strong support for new national parks and reserves. My analysis shows that the majority of those supporting new parks came from a proforma from VNPA which mentioned all areas under investigation. This meant that the VNPA submissions were counted in each of the three areas Wombat/Macedon, Mt Cole/Pyrenees and Wellsford and this skewed results. What is most telling is when the 60+ VNPA proforma submissions are discounted it becomes glaringly obvious that there is not a lot of local support for new parks or reserves, except Wellsford where the Bendigo Environment Network and the Wellsford group have campaigned for the last few years.

Only 3 submissions specifically wanted more parks in Macedon, 4 from Mt Cole/Pyrenees, 12 from Wombat and 20 submissions just wanted more parks in Victoria and were not specific about area.



Section 3: Economic

3.1 No Economic assessments undertaken

The VEAC Act 2001, Section 18 (a), requires adherence to Ecologically Sustainable Development (ESD) principles which are described in Section 4 of the Commissioner for Environmental Sustainability Act 2003. The guiding principles of ESD and the requirements of VEAC Act 2001, Section 18 (g) requires that land use decisions integrate consideration of ecological, social and economic consequences.

There are NO economic assessments produced thus far in the Central West Investigation. Apparently VEAC has commissioned an economic analysis of the timber industry in the investigation area, however it is not clear when this report will be made available.

In regard to the timber industry it appears that VEAC has completely ignored the Ministers comments in response to recommendation 20 of the Statewide Assessment of Public Land *"The Regional Forest Agreements currently outline that any changes to the area of State forest will not lead to a net deterioration in the timber production capacity of those areas available for harvesting."* Section 8.7 of the Draft Proposals Paper states that recommendations would result in a reduction of timber harvest volumes.

There has been absolutely no consideration of the economic impact of the proposed recommendations on other industries including tourism which has been identified as an important economic driver in the Central West Investigation areas.

The Daylesford region is marketed as a "dog friendly" destination. As discussed in Section 2.2, the state forests of this region have very high return visitation rates and it is felt by many that this occurs as families can take their "kids and the family dog" on an inexpensive day trip to natural areas. Recommendations in the Draft Proposals Paper that restrict areas where dogs are allowed will seriously impinge on this cohort.

The total lack of available economic assessments means there will be NO opportunity for community consultation around economic impacts of recommendations coming from this investigation. This does not fit with ESD guiding principles or the VEAC Act 2001 and is very disrespectful to local communities and those most directly impacted.

The total lack of available economic assessments also means the Minister will need to review the statement she made at the release of Central West Investigation Draft Proposals Paper (August 31st 2018) *The review also gives us a chance to evaluate the condition and biodiversity values of these areas, as well as taking stock of the many current uses of this public land and their economic value.*

3.2 Some consultants add little value to Investigation

The VEAC website provides access to four Movie Tours, Wombat Macedon -Mount Cole Pyrenees – Wellsford – Great Dividing Range ridgeline. These brief video footage using Google Earth imagery adds little if any value to the Central West Investigation and I consider it to be a waste of money. It will be interesting to see how much this and the socio economic consultants cost, when the VEAC Annual Report is made available on the VEAC website.

Section 4: Environmental

4.1 EVCs forms basis for CAR reserve system

Victoria has in place a vegetation classification system that defines Ecological Vegetation Classes (EVC) based on vegetation communities and environmental attributes. Benchmarks have been developed to describe the vegetation and attributes of each EVC and the benchmarks '*Represents the average characteristics of a mature and apparently long-undisturbed state of the same vegetation type.*" (Parks et. al. 2003). The EVC benchmarks provide a reference condition which vegetation of the same type can be assessed against.

The EVC classification system was expanded into a state-wide vegetation classification system to provide an empirical basis for the establishment of a Comprehensive, Adequate and Representative (CAR) Reserve System on public land (JANIS 1996). This fulfilled Victoria's obligations under the National Forest Policy Statement (1992).

As part of the Victorian Regional Forest Agreement (RFA) processes EVC descriptions and maps at a scale of 1:100000 were produced and the conservation status of EVCs was established across IBRA bioregions. During the RFAs concern was raised that some vegetation communities could not be mapped at this course scale due to their scattered occurrence or linear configuration such as riparian areas (Benson 2008). Notwithstanding these shortcomings the scale was considered adequate for regional level planning (Victorian RFA Steering Committee 1996, Benson 2008).

In 2002 Victoria's Native Vegetation Management – A Framework for Action (NRE 2002) announced that EVC mapping had been completed across the majority of the state and that the government would now undertake regular remote mapping at a scale of 1:25,000 to detect changes in tree cover (NRE 2002).

The West RFA created a CAR Reserve system based on the nationally agreed criteria for the protection of biodiversity, old growth and wilderness. This included at least 15 per cent of each pre European EVC, 60 per cent of old growth and 90 per cent or more of wilderness. · The RFA added about 194,000 hectares to existing reserves – an increase of 44 per cent. · Which brought the total area of the CAR reserve system to approximately 633,500 hectares, comprising 457,000 in formal reserves and 176,500 informal reserves such as the Special Protection Zone. It meant that 65 % of all public land in the West region is set aside for conservation.

Informal reserves are described in the Nationally Agreed Criteria for the Establishment of a Comprehensive, Adequate and Representative Reserve System for Forests in Australia, (A Report by the Joint ANZECC / MCFFA National Forest Policy Statement Implementation Sub-committee 1997)

Reserves that contain and are managed for conservation values which unequivocally contribute to the CAR system. Such reserves have a sound basis in legislation (e.g., management plans required under legislation) with provision of opportunity for public comment on changes to reserve boundaries, and where decisions on their establishment and alteration are politically accountable. In addition, they must be able to be accurately identified (on maps), and of

sufficient area and adequate design to contribute to the continued viability of the values they seek to protect.

It is quite unfortunate that the Central West Investigation just summarily dismissed the informal reserves set aside in the RFAs. as they claim that the SPZs do not fit the current definition for protected areas. This is a major oversight by VEAC as many of these areas were put into Special Protection Zones (SPZ) because they support under represented EVCs or threatened species. One logical option that VEAC did not consider is how to get SPZs permanently protected so they do meet IUCN protected area criteria.

IUCN protected area management categories classify protected areas according to their management objectives. The categories are recognised by international bodies such as the United Nations and by many national governments as the global standard for defining and recording protected areas and as such are increasingly being incorporated into government legislation. (https://www.iucn.org/theme/protected-areas/about/protected-area-categories)

Australia has adopted the IUCN protected area categories, but we appear to apply this in an overly strict interpretation of these categories. I believe that the government should explore if Ecological restoration in the Wombat Forest and well managed continued use could be accommodated under the IUCN category 5 protected areas. This could see the current SPZs given permanent protection and areas outside the SPZs managed to restore structure, species diversity and carbon potential whilst also providing a sustainable level of goods and services to the community. This kind of management structure could provide a much needed example of forest restoration in Victoria's drier mixed species forests.

Distinguishing features of Category 5 protected areas

Category V protected areas result from biotic, abiotic and human interaction and should have the following essential characteristics:

- *Landscape and/or coastal and island seascape of high and/or distinct scenic quality and with significant associated habitats, flora and fauna and associated cultural features;*
- *A balanced interaction between people and nature that has endured over time and still has integrity, or where there is reasonable hope of restoring that integrity;*
- *Unique or traditional land-use patterns, e.g., as evidenced in sustainable agricultural and forestry systems and human settlements that have evolved in balance with their landscape.*

The following are desirable characteristics:

- *Opportunities for recreation and tourism consistent with life style and economic activities;*
- *Unique or traditional social organizations, as evidenced in local customs, livelihoods and beliefs;*
- *Recognition by artists of all kinds and in cultural traditions (now and in the past);*
- *Potential for ecological and/or landscape restoration.*

www.iucn.org/theme/protected-areas/about/protected-areas-categories/category-v-protected-landscapeseascape

4.2 Proposed regional parks put at risk protected values

Regional parks are not considered protected areas as their main objective is to accommodate large numbers of recreational users. The proposed Wombat Macedon Regional parks include very important SPZs that were set aside 20 years ago to protect environmental values such as water courses, under represented EVCs and threatened species. The Draft Proposals Paper does not discuss what will happen to the protected values in the SPZs when recreational use is concentrated in the proposed new Regional Parks.

The proposed Regional Park around Blackwood cuts across the Lerderderg Heritage River Corridor and borders the Coliban River.

The proposed Regional Park to the west of Macedon includes the headwaters of the Campaspe River and Jacksons Creek. Is Western Water aware that the headwaters of their water catchments will not be in protected areas????

4.3 Climate Change

The Central West Investigation has only considered very limited aspects of climate change mitigation, and failed to properly assess the role these forests play in carbon storage and sequestration. *Forest-based measures to reduce greenhouse gas emissions such as reducing deforestation and increasing sequestration through better management of existing forests and restoring forests have long been considered a valuable climate policy measure.* (Keenan) (https://www.policyforum.net/the-paris-climate-agreement-and-forests).

The suppressed forest stops growing, it becomes much more susceptible to drought, disease and fire, and it shifts from storing to releasing carbon. Wombat Forest Flux site is a long-term ecosystem research site which investigates the complex ecosystem processes of the carbon, water and nutrient cycle in a dry-sclerophyll forest ecosystem. This research site is at the forefront of cutting edge science aimed at informing the management of Australia's forest in a changing environment.

Victoria's Climate Change Act 2017, provides a legislative framework for the recognition of forestry rights, soil carbon rights and carbon sequestration rights on public and private land in Victoria. Victoria's Climate Change Framework (https://www.climatechange.vic.gov.au/victorias-climate-change-framework) states that Victoria will be

- *Increasing opportunities for carbon storage:*
- *investigating the potential for carbon markets and offset funds to deliver increased carbon storage and biodiversity co-benefits from land use change.*
- *piloting a carbon project for the private management of tree planting on public land.*

How will Victoria ever be able to modernise forest management and move towards a more sustainable future if entities like VEAC won't even consider legislated climate change initiatives?

4.4 Biodiversity modelling

The Terms of Reference for the Central West Investigation states that the purpose of the investigation is to;

> ***Identify and evaluate the condition**, natural and biodiversity values and cultural, social and economic values and the current uses of public land in the specified area*

Even though the ToR requires that condition be evaluated, the Biodiversity modelling used in the Central West Investigation does not consider site quality/condition. At the Daylesford drop in session I was told by the VEAC officer that "*the investigation took a broad brush approach that didn't look at site quality on a finer scale*".

P.134 of the Draft Proposals Paper states *Recent timber harvesting history is only incidentally incorporated into DELWP's site condition modelling, largely on the basis that the period of its impacts on site condition are considered to be relatively short term.* This assumption is not referenced and certainly doesn't stand up against historical experience

A large proportion of the forests in the Central West Investigation are in a depauperate and structurally poor condition because they were subjected to two decades of intensive unsustainable logging. Large areas of forest outside the RFA CAR reserve system are now in a suppressed state with too many small diameter trees per hectare, but, unlike the Ash forests in the East these drier forests do not naturally self-thin. To regain a more natural structure the suppressed mixed species forests in the West must wait for a catastrophic event to kill some of the trees and allow those that remain to grow on. The suppressed forest stops growing, the small diameter trees provide poor habitat and water catchment benefits. If we truly wanted to benefit biodiversity and the full suite of environmental values we would come up with an ecological restoration plan for these forests and not simply change the land status.



Figure 2: Suppressed regrowth in the Wombat State Forest

As discussed in Section 1.3 suggested that fuel reduction burns can be used to thin young regrowth. I can't find any scientific evidence to support hypothesis that fuel reduction burns are a viable method for thinning suppressed regrowth forests. Experience leads me to think only extremely hot fuel reduction burns that would be very hard to control would have a thinning effect on th regrowth in the Wombat Forets Also most of the suppressed areas in the Wombat forest are 15 to 35 years of age and could not be considered

young regrowth. The series of photographs on the below show that very few stems are killed even in a relatively hot fuel reduction burn.



Figure 3 : A fuel reduction burn was undertaken in young post sheltwerwood regrowth. The burn was started at midday, using a Brisbane drip torch several ignition points were set alight (photo by author)



Figure 4: Later that evening the wind picked up and the fuel reduction burn increased in intensity, this caused considerable crown scorch across the site. (photo by author)



Figure 5: A year later the post shelterwood regrowth had re-established crown cover and recovered from the hot fuel reduction . (photo by author)

Conclusions:

This report has raised serious concerns about the overall governance of VEAC including acts of collusion, cronyism, and corruption of process which have seriously damaged VEACs reputation as an independent advisory body. It is most likely that outcomes from this demonstrably flawed process will not be acceptable to the general public It should be an imperative that the Minister address these matters with urgency and in such a way that public confidence can be restored in VEAC.

The State and Commonwealth governments have signed a Memorandum of Understanding committing the parties to work towards Modernising Victoria's Regional Forest Agreement Framework. This process should include revisiting and updating the original Comprehensive Regional Assessments that provided the information for the development of each RFA. The timeline below shows that the RFA revitalisation process has commenced.

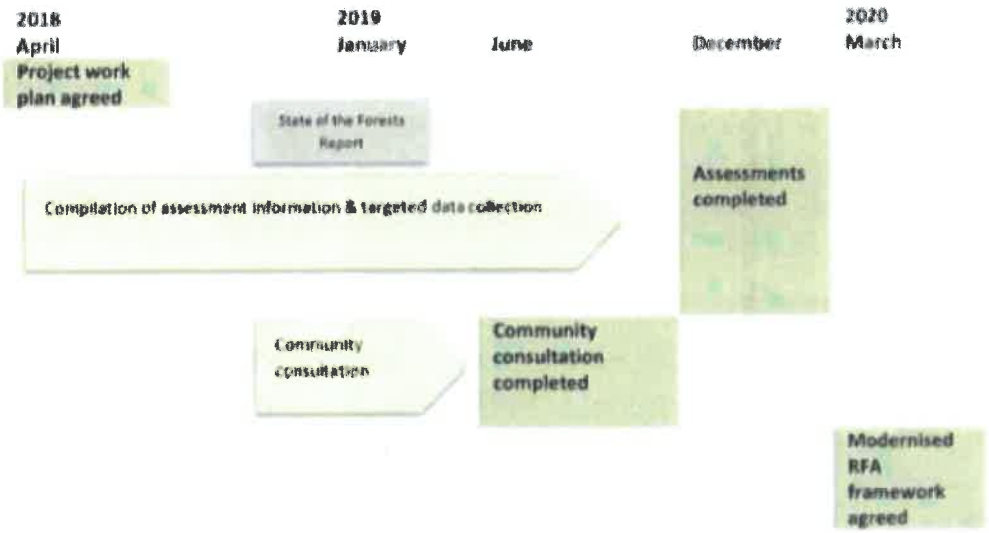


Figure 6: A timetable of milestones to be met by March 2020 ; from Memorandum of Understanding, Modernising Victoria's Regional Forest Agreement Framework between the Commonwealth of Australia and the

Recommendation:

The Minister needs to immediately undertake a review of VEAC and restructure the organisation to prevent the cronyism and corruption of process that has been identified in the Central West Investigation.

To save on duplication the State government should abandon the Central West Investigation in its current form and align the assessment of West Victoria's forests with structures that are already in place. This means the Wombat/Macedon and Mount Cole areas would be reassessed as part of the RFA revitalisation agenda. And the Wellsford Forest should be assessed as part of the much overdue reassessment of the Box Ironbark Investigations.