Environment Victoria Inc.

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Dear WFS ,

I am writing to seek the support of your group in seeking major changes to current consultations on forestry activities in Victoria.

At the last Victorian forest summit there was discussion of the many problems associated with the lack of any effective public consultation for current Victorian forestry activities. There are two main processes currently: the Wood Utilisation Plans (WUP's) and the development of Forest Management Plans (FMP's) in each region.

The WUP's are the annual logging plans. They show which specific sites will be logged. As most of you will be aware these are plans produced in the first part of each year for the coming logging year (from July to June each year).

The FMP's are long term plans being developed for each Forest Management Area. Two have been finished (East Gippsland and the Otways) and several others are part way through being completed (Midlands, Dandenong, Mid-Murray, Central and Central Gippsland). Others will begin shortly. The FMP's set out what parts of the forest will be available for logging, how much wood will be cut each year, what areas will or won't be preserved for threatened species, etc etc. They set the long-term plans for a regions forests (but note that they don't examine areas already reserved from logging and woodchipping such as national parks and flora and fauna reserves).

All participants at the Victorian summit agreed that there are serious problems with how these processes are currently occurring. Because of the way the processes are currently organised none of the groups involved felt that public involvement in any of these processes was producing, nor could produce more than token changes in forestry practices. Details of some of these problems are given below.

Meanwhile the State Government is stating it has good public consultation on these processes and is gaining positive publicity from such statements. The issue of public consultation will become particularly important when the State Government begins seeking Federal Government approval for its forestry practices in the state. Real public consultation, or the lack of it, is an important political issue that the Federal Government will be considering. It is very important that the environment movement in Victoria either obtain real and effective consultative mechanisms - or publically disassociate themselves from the processes.

If the current situation is allowed to continue our names will continue to be used publically by the State Government to justify the current status quo of logging and woodchipping. For example the bureaucrat in charge of the East Gippsland FMP recently appeared on ABC radio talking of how effective their community consultation had been. Only two local conservation groups had remained involved in that process. He named these two groups as a positive example of how DCNR had consulted widely and genuinely. My understanding is that neither of these groups have felt that their views have genuinely and properly been taken into consideration.

I am writing on behalf of the groups represented at the forest summit. Attached is a draft letter to to the Victorian Minister for Natural Resources, Mr. Coleman. It sets out concerns expressed by conservation groups about these processes. It also sets out details of what our requirements are that would enable signatory groups to be involved in these processes in the future.

We would like your group to be a signatory to this. It is of course extremely important that the conservation groups involved in forestry issues in Victoria present a united front on this issue. Time is pressing on this issue. I would like to receive replies by the 20th July. I realise that his may not fall within a meeting of your decision making committee or council. However, if you do whatever is required to give me your decsion this would be greatly appreciated.

We would contact you as soon as possible once we had a response from the Minister.

Please contact me at Environment Victoria, or at home if you want any further details or wish to discuss the letter further. I welcome any additional points or comments you would like to include.

Thank-you,



Barry Traill (H) 03 4897584

DRAFT LETTER FOR ENVIRONMENT GROUPS

Hon. Geoff Coleman
Minister for Natural Resources
xx
East Melbourne 3002

xx July 1995

Dear Mr. Coleman,

For some time now the undersigned groups have had major concerns about the public consultative processes associated with forestry activities in Victoria. We have had serious problems obtaining access to information in the two principle public processes, the Forest Management Plans and the annual Wood Utilisation Plans. We have had great difficulty in obtaining input in any meaningful way into these processes.

Forest Management Plan process.

1. Selection of conservation groups representatives on Forest Management Plan committees.

Representatives of conservation groups are selected by the DCNR for the Forest Management Plan (FMP) advisory committees. Some groups have been excluded from participating on the committee despite their demonstrated interest and expertise. For example in the Midlands the Wombat Forest Society has been refused a position on the Midlands Forest Management Plan committee. The Wombat Forest Society is the largest, and by far the most active conservation group working on forest conservation issues in the Midlands area.

Environment Victoria initially had a representative on the Dandenongs FMA advisory committee. The committee did not meet for some time. When it began meeting again recently the first xx meetings were held without conservation group representatives. DCNR then contacted a local conservation group, the Upper Yarra Conservation Society at very short notice and asked them to provide a representative for the FMP advisory committee. DCNR did not inform Environemnt Victoria that the committee had been resurrected. Environment Victoria only learnt from the Upper Yarra Con. Soc. about the changes.

2. Consideration of non-wood values in the Forest Management Plan process.

There has been a consistent failure to fully and properly consider non-wood values in the FMP processes. An implicit pre-condition of the FMP plans to date has been that an the wood production volumes should be be maintained or increased in the areas. Alternative economic values such as water production and eco-tourism have been ignored or not examined fully. The requirement for any additional areas for nature conservation have been similarly ignored or side-stepped.

Specific examples of this problem are:

* The refusal to do an independent economic analysis of the timber industry in the East Gippsland plan.

* No detailed analysis of the consequences in reduced water yields in the Betka Catchment, a vital water supply for the tourist town of Mallacoota. The town is experiencing water supply problems.

* The refusal by the Department to provide conservation groups with unpublished flora and fauna survey reports for East Gippsland and Central Gippsland. This included refusals of freedom of information requests. Under the previous Government these were published public documents which recommended biological sites of significance to be protected from logging.

* During the FMP process in East Gippsland the DCNR removed their recognition of biological sites of significance previously determined by the department's own biologists.

* In most regions there has been very little input by departmental officers with biological expertise. For example the draft of the Dandenong FMP fails to take account of recent research on threatened species. At the last meeting of the Mid-Murray FMP committee there were seven departmental foresters and forest officers. There was no one from the department present who had fauna or flora expertise. As with the Dandenong draft plan the Mid-Murray draft plan fails to utilise, or even acknowledge, the latest research on threatened species in the region.

3. Funding of community group involvement.

No provision of funding or other resources has been provided to conservation groups or other community representatives to facilitate their input. Representatives are expected to provide detailed comments, on very complex sets of information, in their own time.

Wood Utilisation Plans

There have now been three years in which the Wood Utilisation Plan process has occurred. In the first year funding was provided to Environment Victoria to properly analyse the plans and provide comments on behalf of the environment movement. No funding has been provided in the last two years.

The current process is for a 30 day public comment period to read them and provide comments. Providers of comments then receive an acknowledgement from the region. We know of no cases where the region has actually replied in detail on how public comments were incorporated in the plan.

There has been a consistent reluctance of some regions to provide the wood utilisation plans to community groups and interested individuals. This has included a number of cases where individuals have been refused copies of the wood utilisation plans despite the plans being designated as public documents. In a number of cases over the last two years people have been allowed to look at the WUP's documents and maps in DCNR offices but were refused permission to copy them, despite their willingness to pay for photocopying. These people were forced to spend lengthy periods of time copying these complex documents by hand.

To the best of our knowledge in *no* cases have submissions into the Wood Utilisation Process led to changes in the logging plans in favour of non-timber interests. In a few cases logging has been re-scheduled from areas after specific campaigns or lobbying to protect an area. Over the last two years these campaigns have been conducted largely or completely outside the WUP's process. This is because the collective experience of all our groups has been that comments made on the Wood Utilisation plans will *not* receive any serious examination or consideration by the relevent departmental officers.

Adequate consultative processes

Any public consultation program which is genuinely intended to provide for real input from the wider community must include:

1. Provision of adequate funding and other resources for community groups to facilitate their input.

2. Access to all information relevent to the particular process.

3. Adequate time for public input.

4. An interactive process where input is genuinely considered and feedback is provided on how public comments will be incorporated.

5. Clear and transparent process for evaluating different options.

None of these points are currently being met in the FMA and WUP processes. The current processes are public consultation processes in name only.

If we are to provide input into these processes then a genuine committment is needed from your Department to public consultation. We are only prepared to be involved in these processes if the following committments are made:

FMA process

1. That two representatives of conservation groups be given places places on each FMA committee. That one of theserepresentatives be nominated by the local conservation group that is most actively working on forestry related issues in the region. The other representative should be nominated by Environment Victoria to be a representative on behalf of other national, state and local conservation groups.

2. Representatives should be paid standard sitting rate fees during their time on the committee.

3. All relevent departmental information is available to the community representatives on the FMA consultative committees.

4. Annual wood production volumes are open to change as part of the FMA process.

5.. Where there is a conflict between competing economic interests, such as wood and water or wood and eco-tourism then an independent economic analysis be commissioned as part of the FMA process.

WUP's process

1. The current process be amended to allow for two months time for public comment.

2. That adequate funding be provided to Environment Victoria to carry out a complete analysis and public comment of each years WUP's on behalf of all national, state and local conservation groups.

3. That a committee with community group representation examine the final WUP's before logging commences. In the event that this Committee cannot reach agreement on a particular coupe then the decision should be referred to the Minister for Natural Resources for a final judgement. This committee should have a representative nominated by Environment Victoria on behalf of national, state and local environment groups. This representative should be paid standard sitting fees during their time on this committee.

We reiterate that we are only prepared to be involved in these processes if you are prepared to make firm committments on establishing such processes. Given that these processes are continuing rapidly we would appreciate a response on this matter as soon as possible.

Yours sincerely,

Jayne Weepers.
Environment Victoria.

on behalf of: xxxxxxxx signatory groups.

Groups that have being asked:

Victorian National Park Assoc., The Wilderness Society, Australian Conservation Foundation, Concerned Residents of East Gippsland, Wombat Forest Society, Upper Yarra Valley Society, Goongerah Environment Centre, South-west Environment Action Group, Melb Womens Walking Club, Upper Beaconsfield Conservation Group, Bird Observers Club of Australia, Goulbourn Valley Environment Group, Geelong Environment Council, South Gippsland Conservation Society, Albury-Wodonga Environment Centre, W.H.E.N., Natural Resources Conservation League, Victorian Society Growing Aust. Plants, Pascoe Vale, Bendigo, Portland, Latrobe Valley and Stawell Field Naturalist Clubs, Beechworth Env. Group, Knox Env. Group, and as many other local groups involved in forestry issues or likely to be involved in forestry issues that I am able to contact.

If there are any additional groups you think should be included please contact Barry Traill and give me their names and addresses.