Central West Investigation Proposal Paper Response

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Without Prejudice. This submission reflects my views on the process, VEAC and participants in the process.

Executive Summary

I have never seen such broad community outrage to a report on the Wombat Forest as the Central West Investigation has incited. People from all walks of life, towns and communities, political persuasion, environmentalists, businesses, timber folk, users etc are mobilised and clearly rejecting VEAC's report. Many are commenting at how wrong many of the conclusions and recommendations are, their obvious lack of real knowledge of the state of the Wombat Forest, that some assertions are counter to science.

It is incredible just how passionate and connected the people of Central Victoria are to the Wombat Forest. It really is the People's Forest. At the same time everyone appreciates the natural values and wants them properly managed.

What is being touted, for the Wombat Forest to become a national park, is a disaster for the forest and its natural values and for residents and users alike. VEAC clearly have not had a look at the condition of the forest. Some of their findings and recommendations are ludicrous. The lack of an evidenced based justification renders the proposal as invalid. Many of the assertions for locking up the forest are completely counter to the science on these matters.

We have been told we can have a national park that allows a range of activities not allowed in other national Parks like dogs, horse riding, thinning, recreational activities etc. In addition it tells us that the towns and surrounding communities can collect firewood from the regional parks, where no other regional park allows for this.

This is a ridiculous situation. VEAC appear happy to recommend a range of activities not allowed in other national parks and regional parks so they get a new national park across the line in Central Victoria.

I support National Parks and their importance. I support the Great National Park concept. I cannot accept or support the Wombat National Park concept for a number of reasons I will cover in my submission.

This would severely compromise the value of the National Park status and introduce the thin end of the wedge for these prohibited activities in other national parks. Or is the proposal making the community feel they will not have their uses effected in our region,

knowing that once proclaimed a national park, most or all of the above will be effectively banned. Neither option is acceptable.

The Minister should direct VEAC to investigate creating a whole new forest category for the Wombat Forest- the Wombat Carbon Forest. It is time for a new public land category that reflects positive climate change action by thinning the regrowth and thus allowing the forest to store more carbon that its current 'locked' condition is doing. It will improve water yield, restore the forest to a more natural structure, benefiting biodiversity outcomes. Most importantly it will make the Wombat Forest more resilient to projected changes in our climate.

The Wombat Carbon Forest could allow for all of the current firewood collection, recreational and social activities that are currently allowed in the forest. The new category can excise the Wombat Forest from availability to Vicforests, and prohibit commercial mining ventures.

This would complement the State Government's actions and commitments to addressing climate change. It would be the first carbon forest in Australia. The carbon credits the government would get from storing more carbon in the Wombat could be used to hire and train young people to do the thinning.

My submission will only look at the consultative processes and discuss the significant shortcoming in the way it has been implemented. I have an FOI on for the Central West Investigation Engagement Plan and a list of meetings, tours etc that VEAC has had in relation to the investigation. I have not received any information back, just initial FOI gobbledegook then nothing.

I conclude that there VEAC did not do a proper scoping and community & stakeholder engagement plan. I also assume there has been a failure to have an ongoing record of meetings, tours etc, hence not being supplied this.

The process looks entirely outcome driven towards a National Park for the Wombat. VEAC are not applying the IUCN or Commonwealth Protected Area categories and the way it is describing what is acceptable as protected areas in meetings and drop in sessions are a lie. I have contacted both the IUCN and the commonwealth Department of Environment. They confirm my comments above in relation to what are accepted as protected areas.

I, like a massive number of locals to the Wombat Forest as well as users and visitors, completely reject the VEAC Central West Investigation proposal. The consultative process has been very poor; the sessions not planned or framed to get targeted feedback on issues that it turns out VEAC were after. We are not mind readers.

The shallowness of the Central West Investigation, the lack of evidence based assertions, the boundaries that do not align with bioregional boundaries, the non-conforming

application of the IUCN Protected Area Categories, the misrepresentation of analysis of first round submissions all culminating with the national park recommendation, calls into question exactly what is going on in VEAC.

The Minister should reject the process to date, carry out a review of the process, a review of VEAC's independence and insert a new step into the investigation that can explore alternative recommendations. One being the creation of the Carbon Forest land management category, that sits under DWELP and NOT Parks Victoria. DWELP have the operational and structural capability to carry out the restoration works as well as the range of other management activities.

Central West Investigation Consultation Process

The consultation process for the Central West Investigation has significant issues. I will go over the two phases of consultation and raise my concerns within the context of the DWELP predecessor, the Department of Sustainability and Environment's community and stakeholder engagement package. This was developed in the early 2000's and training was available for DSE and other government department staff.

The package was comprehensive and contained a large number of templates and engagement strategy pro formas so planning any engagement was well thought through, was able to target the primary audience effectively, acknowledged and covered a number of ways for people to respond to processes and in a way that catered for their needs.

I have FOI'd VEAC's engagement strategy for the Central West Investigation and a list of who they consulted near the start of the 2nd round of submissions but as I write this I have not received the information. As such I can only speculate how well VEAC planned out its engagement.

Additional Note: It is now 1 days before the end of the submission period. I have not received a copy of the VEAC Central West Investigation Community & Stakeholder Engagement Strategy or list of meetings and tours of the areas as FIO'd. My conclusion on the engagement plan can only be there is not one. This could be a reason why there are so many failings and biases in the Central West Investigation consultation.

Our experience over the past 6 weeks has been a cascade from pockets of Wombat Forest communities or communities of interest that have contacted us having only just finding out about the proposal, having just found out about the implications and only just finding out how to make submissions. We are talking thousands of people. This is an indictment of the engagement process and potentially a symptom of poor engagement planning right from the start. It is also clear that some groups had "insider" knowledge on how to make submissions that counted multiple times, distorting submission number and number of people with a particular position.

> ***3.1.2 Written submissions***
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> ***Support for status quo***
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> *Some 190 submissions expressed a desire for things to continue as they are and for current activities in parks and forests to remain unchanged. Most of these referred to the investigation area in general; however some referenced specific forests or areas, especially Wombat State Forest.*

VEAC has used submissions that named specific areas in some cases and if a submission names each investigation area separately they are counted 3 time in the same light have submissions that do not name a specific investigation area in their submission also counted applying to all 3? Analysis of submission suggest they have not.

Why do VEAC report that only 190 submissions want a status quo? In fact when you combine those that clearly do not want a NP with the status quo (which means the same thing) you get 420 of the 640 submission DO NOT WANT A NATIONAL PARK.

All very muddy and open to manipulation in reporting, whereas a properly developed engagement process would have anticipated these issues and asked for information in specific ways by asking questions on specific areas, and issues.

Given VEAC sits under DWELP, has anyone within VEAC done the departmental community and stakeholder training? If they have, why is this process so poor in regards to consultation?

Both the first and second round public engagement and submission processes have been very inadequate and do not appear to have been designed to facilitate meaningful an effective public feedback. Particularly on topis or directions VEAC was look at.

The first consultation round had drop in sessions where those attending were not told that VEAC intended to recommend a national park, or wanted people to flag national park or no national park, nor did it explain that unless you specifically mention the area you are responding to then it would not count. Nor did it explain that if you nominated by name the 3 areas under investigation your submission counted 3 times. It is clear to the public now that submissions sent in from people that identify or are from the VNPA, knew that this was how they wold be sorted.

Anyone that did attend a drop in session had most questions answered with “put it in your submission”. Not that submissions were individually answered so those people and I am aware of organisations and bodies, when they asked questions about the investigation, did not get their query answered but were told to “put it in your submission.” This does answer their question.

Why, during the first round of consultation, weren’t the community and stakeholders given literature on the process and a questionnaire with specific areas that VEAC sought comment on? This would have made it a level playing field for everyone and VEAC could have garnered answers and opinions on the direction it clearly intended to take. This would have been useful for getting respondents to focus on these issues and VEAC would have had a clearer picture of were public sentiment lay.

The other huge failure in both rounds of consultation has been the assumption that everyone has the capacity, access and confidence to respond with a written submission. Again, the DSE Community & Stakeholder Engagement Tools make it clear in the planning stage that there are a number of impediments for some people to be able to engage. These can be literacy issues, confidence and capacity to do a written submission, handicaps, confidence to speak up in a public settings, access to IT and internet, language issues etc.

These considerations would have seen a suite of different options for respondents and a range of different consultative styles offered to the community.

The way the first round submissions were sorted to justify the national park option was not fair or honest. As you will read in my wife’s submission, the way they were sorted and tallied and reported does NOT reflect the responses the community sent in. VEAC claims the majority wanted the Wombat as a NP. In fact it was 12 people who live in or near the WF that wanted a NP. Of the 640 submissions, 2/3rds were opposed to the NP, so how the claim that majority wanted the NP does not hold up as accurate?

The first consultation sessions were drop in sessions. VEAC staff sat and heard from a large number of community members. It is an insult to those that attended and gave verbal submissions that there attendance or comments are not in the published submission section on the VEAC site or proposal. Those that attended cannot be sure their comments were noted accurately, thoroughly or at all!

In the data used to gauge the public's opinion on the NP proposal, why aren't the comments and positions of the people that gave verbal submissions given the same weight or recognition as written submission?

3.1.2 Written submissions

The written submission process is one of the key avenues used by VEAC to seek community views on issues and values associated with public land.

Rule 101 of community engagement is recognising that there has to be a number of different ways people can make submissions that respectfully reflects the wide range of capacities and barriers to community members making submissions. VEAC stating that "written submissions in one of the key avenues used by VEAC" in its reporting is prejudiced against those that may have issues with doing written submissions and an insult to those that took the time and effort to attend the unstructured sessions.

I am aware of at least one person who went to the first drop in session in Daylesford. He has an acquired injury that means he can no longer use a computer, he asked for the VEAC person to record an 'oral' submission. He gave his views which were recorded but he is not listed as having put in a submission. This is a significant breach of community faith.

The proposal treats pro forma responses with what appears to a reduced credibility over individually written submissions. Example-

"Almost 80 submissions (around half using a pro forma submission) were received in support of hunting as a recreational activity"

"Investigation process

Some 100 submissions (around half using a pro forma submission) commented on VEAC's investigation processes such as the terms of reference, information sources, scope of the investigation, advertising or notification, and the consultation approach and period. The pro forma submission which accounted for almost half of these sought to highlight that the terms of reference ask that VEAC's recommendations ensure the balanced use and appropriate management arrangements of public land and suggested potential contacts for VEAC to consult."

Recreational access

"Recreational access and use was described as a threat to some natural areas in approximately 100 submissions (half using a pro forma submission) and restrictions to access and use were proposed."

Why the need for these pro forma qualifications? This is an insult to those that have sent them in. Their use of a pro forma may be the result of lack of confidence or experience in doing written submissions. It may reflect that the pro forma says what they want to say and so use it as their input. It may reflect that they have literacy issues and use it as it expresses their views. It may reflect that have time constraints and using a pro forma's that reflects their views is efficient for them.

VEAC must take each and every submission as important and of equal weighting. There is no legitimacy in giving some submissions lesser weighting because they are not individually written. Again, if VEAC had put out a questionnaire covering the areas and issues they are considering it would have helped many people focus and possibly give individual responses to the investigation.

There is no credibility in the way submissions have been sorted and used when there was no direction during the first consultation phase telling the public that there are the areas we will be looking at. I.e. recreation, firewood, resources use national park or no national park etc

The Central West Investigation proposal contains a section that looks at submissions from the first round. It meanders through a narrative raising some of the issues raised in submissions. The way the proposal covers the issues has no legitimacy.

The section raises issues or views on topics and then use a number of submissions say "xyz".

Example-

> *"Around 30 submissions proposed that domestic firewood collection be allowed in specific forests (mostly Wombat State Forest) or the investigation area in general, while others stated that domestic firewood collection should not be allowed in various state forests*

The above is an example where VEAC uses comments like "around 30 submissions" and then "while others stated that" means nothing. Was it around 30? Meaning what somewhere from say 27 to 33 submissions and the "others Stated" where there 20, 10 1 submission?

Given my wife (Loris Duclos) put all submissions into an excel spreadsheet and quantified all views in all submissions, why couldn't VEAC do the same and report exact numbers? The report reads in such a way as to use unspecified "other said" comments to suggest there is a counter view that has near to equal value or acts to attempt to cancel out the submitters who did or did not want something.

This whole section in the Central West Investigation proposal has no legitimacy as it is written and should be thrown out and will be part of the argument for this investigation to be suspended and a review carried out on its failings followed by a fresh round of properly planned consultation.

All of the first round submissions should have been entered into a data-base. The waffle that covers where we all 'said' or 'did not say', 'wanted' or 'did not want', should have been done with a simple matrix that showed the issues or areas discussed and actual number for each view entered into the matrix.

This would have given an accurate reflection of public submissions. As the report reads it is a subjective not objective reporting and analysis of submissions and potentially reflects a bias that an objective reporting method would not show.

Given the interment exists, why weren't there any online questionnaires on topic VEAC wanted to explore. Why weren't there anything online or using formal online polls on topics? These could have been done in conjunction with printed versions available for community members that did not have internet access or skills to pick up and fill in?

The first round consultation does not stand up against best or even average practice in NRM consultation.

Second Round Consultation (or not)

Consultation implies that the body consulting is looking for views and information from those they are consulting with.

My experience at the drop in session I attended was not consultation b**ut** VEAC staff challenging and dismissing points I was raising and arguing for the NP. This was not a good message from a body that is meant to be independent. My experience was a strong impression that the National Park proposal was there to be defended by VEAC not open minded to counter views or options.

When I asked why there are no references to support that assertions for the lock up of the Wombat, I was told by a Councillor that they did not want to make it to technical or complicated for the community to understand. This is incredibly condescending to our community. The Wombat Forest Society campaign was the most successful community forest campaign in the late 1990's and first half of the 2000's. It was based on sophisticated modelling and predictive tools developed by the community that was proven to be better than the then DCN&R's.

The WFS won important EVC gains in the Regional Forest Agreements again using evidenced based arguments. The RFA did intense historic, social, biodiversity and economic assessments. These were carried out with extensive community consultation and workshops. These have not been used by VEAC and only adds to what appears to be an institutional prejudice against anything that came out of the field of forestry.

This has only weakened the appallingly incomplete list of historical sites in the Wombat Forest. Why are so many sites missing? Is it the result of only shallow investigations of deliberate? There is a wealth of historic sites across the Wombat Forest, there are books with the history and location of most sites. The RFA did extensive work on these including running a number of workshops were the community nominated sites they knew of. Why has VEAC not bothered to do a proper job building the historic and heritage sites when they are so easily accessed?

The Wombat Forest is the most studied forest in Australia. It has had extensive research carried out by Melbourne University given its close proximity to the Creswick Campus. It had the most intense State Wide Forest Resource Inventory ground trothing. This work also did a broad range of habitat assessments while the inventory work was done.

The WFS modelling allowed the WFS to stop logging in important habitat's and eventually bring about a 79% reduction in logging levels in the Wombat and an average of 30% across the east of the state. It was always an evidenced based approach that drew on latest scientific research.

In the light of this the Central West Investigation Proposal paper is a very weak document that has no technical or scientific credibility. On this basis alone the Investigation should be sent back to the start and commenced again, only this time thoroughly and with evidence to back up assertions. This may be difficult and possibly why there are no references, that so many assertions are counter to existing research.

In conversations with over a dozen other community members that attended the drop in sessions, all had experienced the same feeling of their ideas being rejected or argued against due to not supporting the NP. No notes were taken, they could not cite any scientific research to back up positions in the proposal.

Notes were not taken of views from people at the drop in sessions. Again, community engagement 101a, drop in sessions should be used as legitimate opportunities for people who wish to make oral; submissions. There may be reasons why they are not able to do written submissions. VEAC has not listed the people gave oral presentations in the first round consultation. VEAC does recognise that people participated in them and their views were considered in the proposal, but this again de-values people that took the time to attend. The fact that the people who did attend drop in sessions and spoke to VEAC staff have not been listed in the proposal is an insult to those who took the time to come to the sessions.

Consultation Conclusion

All in all, the community consultation regarding the Central West Investigation appears poorly planned and executed. It has missed a swathe of Wombat Forest locals and a number of user groups. It is interesting to see these groups reaching out to those who are participating and commenting via





social media and local networks and NOT VEAC.

The rally I organised in Gisborne had just over 1500 people attend. The common theme was disapproval of the consultative process, loosing access for recreational activities and not believing VEAC when they say they still be allowed to happen even though no other national park in the State allows them.



My experience at the Trentham meeting saw one of VEAC's presenters mislead the meeting via omission over VicForests intent. This blew credibility as independent. He pushed a position and inflamed the topic at the meeting through omission to

help bolster support for the need for a NP. He openly lied to someone who questioned whether VicForest were definitely going to take 10 000m3 of sawlogs. His reply was yes it is writing. This proves he had read their submission and sop knows they say that they would only log the forest 'if the community invited them.'

When I challenged after the meeting about this his reply was- yes VicForests did say they would only log if the community invited them, and yes perhaps he should have added that. Again, VEAC ids not objective and not independent, they are a branch of the VNPA.

The two instances of VEAC Councillors making comment in two local newspapers was a strange and unethical thing to do during a submission period. Of all of the range of issues and aspects being covered by the investigation thinning and endangered species are the two commented on. In both cases they were factually incorrect.

The endangered species comment by the Chair in the Hepburn Advocate, confused the whole Victorian Uplands Bioregion with the Wombat Forest sub-section. I will deal with the fact that to not look at the whole bioregion is against what the Commonwealth has asked from all land managers, later in my submission. Not using the whole bioregion makes it hard to pull data for smaller areas within it and makes mistakes like to one that has happened. Assuming it was a mistake and not an emotive scare tactic to back the NP proposal.

In the case of comment in the Midlands Express, on using fire as a thinning tool- YOU HAVE GOT TO BE KIDDING!! There is no research where this has been tested in Australia. It is not in the Central West Investigation and so the Councillor has plucked it freedom somewhere, maybe his mind. Fire to thin the forest is about the stupidest idea I have ever heard of in relation to the Wombat Forest.



Lets look at the idea- suggest running a fire through regrowth will thin it to fix all of the problems associated with an overstocked locking up areas of forest. Fire will turn soil nutrients into soluble salts that will leach from the site, fire will favour fire tolerant species, fire will encourage weeds, fire will not thin the forest unless it is very hot and even then randomly kill trees not necessarily the suppressed, fire will impact habitat (ground debris), fire will kill soil biota, fire will kill invertebrates on site, fire will kill ground dwelling species, fire will contribute atmospheric carbon, fire retards the growth of the trees and is very likely to trigger a new regeneration in the eucalypts adding to the over stocking problem.

There is a recent example of why this concept won't work. The 2010 Muskvale fire ran in a north easterly direction thru areas that are heavily over stocked. This was a hot fore that ran approx. 8 kms in 2 hours. It did not thin the regrowth, it's all there to see.

We have made enquiries with Victorian and National academics and fire experts that work in the field of fire and forests. There is no research around using fire as a thinning tool in Australia's forests.

seems to be grasping at straws to avoid what NEEDS to be done with the wheat field regrowth- thinning it by hand, with trained eyes and knowledge. So blinkered Trump Style National Park concept again. He suggests putting a virtual wall around the Wombat Forest (National Park) regardless of science and the reality of the condition of the forest and what is actually needed to restore the forest.

By the TRUMP approach I mean VEAC is saying let's put a big wall around the Wombat Forest to protect it. The threats VEAC cites lack credibility, VEAC has not looked at the internal structure, condition, what science says about the forest, what informed locals say about the forest, not consider what doing nothing will actually do and what threats or risks it supports. Just like Trump and his wall to keep people out, without looking at the reality of the US internal economy, whether business and technology are taking future jobs, what climate change will do to the US.

In both of these cases, they were made while the Victorian Public Service was in caretaker mode and should not have been made. And if comment was invited it needed to be cleared at the highest levels first. Both the Chair and should be stood down from VEAC for this significant breach of the Caretaker Convention.

Protection, Threats, Risks

VEAC is saying the Wombat Forest needs to become a National Park to protect it. Protect it from what? It is apparently logging and mining. As I comment above and further into the submission, VicForests have said clearly they will not log the forest unless invited to by the community.

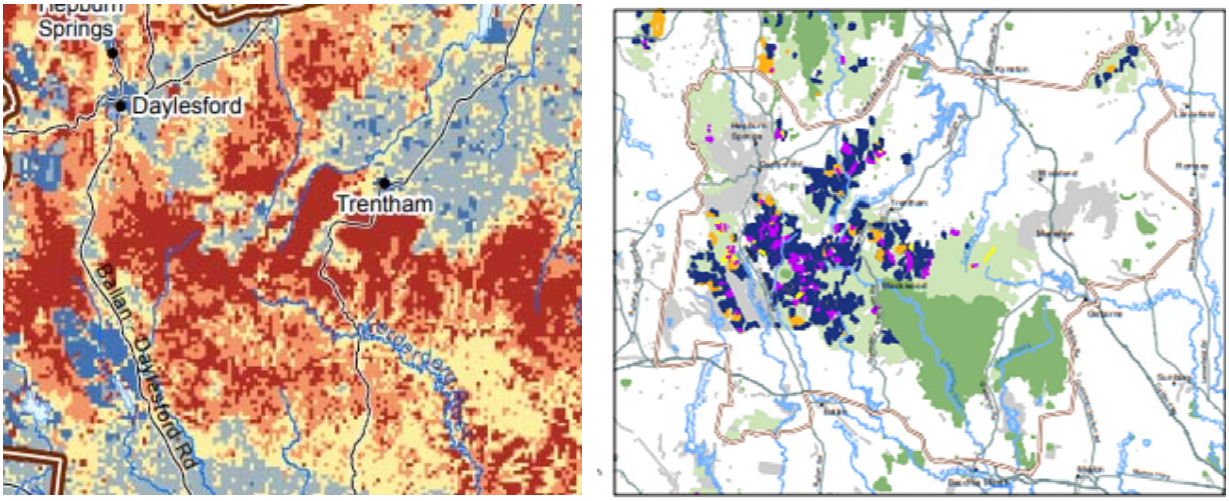
> ***VicForests***
>
> *VicForests was established in 2003 as the State owned enterprise responsible for the sustainable harvest, regeneration and commercial sale of timber from state forests in Victoria, initially in eastern Victoria. In November 2014, management of the timber harvesting operations in western Victorian forests was transferred to VicForests. VicForests refers to western Victorian operations as 'community' (rather than 'commercial') forestry to reflect their relatively small scale compared with activities in eastern Victoria.*
>
> *Unlike for eastern Victoria, VicForests does not manage timber resources in state forest in the West Victorian RFA through an allocation order made under the Sustainable Forests (Timber) Act 2004 but acts as a service provider managing licences under section 52 of the Forests Act 1958.*

The gold has been mined out of the main section of the Wombat Forest 100 years ago. What some people appear to not understand is the speculative nature of mining exploration licenses. People or companies that then out to effectively get a stake in any mining that may happen. Exploration licenses cover most areas were there is potential for some mineral. As we saw with the recent Abel's Reef issue, Company A had an exploration license, Company A wanted to get some money for it so they put its availability on the market. In this case, Company B is interested, looked at the viability and walked away as there was no gold worth mining. As local knowledge already knew. Is that Chicken Little I hear again?

So what is the real threat? The threat is doing nothing in the face of climate change and the condition of the WF at present. VEAC do not appear to really know the condition of the Wombat by the proposal by this reference in one of its own reports-

> **Site condition**
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> The overview of site condition within the Central West Investigation area was informed by VEAC's Remnant Native Vegetation Investigation (2011) www.veac.vic.gov.au/investigation/ remnant-native-vegetation-investigation.
>
> Detailed information on specific issues affecting the condition of vegetation in various parts of the Investigation area was obtained from submissions, scientific literature and internal government documents.

VEAC does refer to the GIS data that DWELP hold and it does allow informed analysis of the relative age classes of the forest, the EVC's, The CAR Reserve System etc. It is therefore a mystery why it has not been fully used in this Proposal?



The left side map is part of Map E showing high biodiversity value areas of the forest. The right map shows logging history by decades. Dark blue are areas logged in the 1990's.

The map (Map E) showing biodiversity hot spots for the Wombat is clearly modelled. It is showing areas that had some of the heaviest seed tree logging are now considered to be at the highest value for biodiversity. Is this true, is VEAC suggesting that clearfell logging produces high grade biodiversity values only 10-20 years after the logging? Maybe VEAC should suggest clearfelling the rest if its evidence is it produces this result. In fact according to the map the areas that had the most intense logging in the 1990's now have the highest biodiversity values in the forest. I don't think so!

Or it shows that the model was not ground-truthed at any point and so it is basically a useless map from which to draw any conclusions. The map means nothing as presented. Anyone that knows the forest well can look at the map and see areas that DO have very high biodiversity values and do have threatened fauna in them are shown as lower value on Map E.

Going back to 'threats', it is a shame VEAC has decided the only tools for managing threats are the ones in the toolbox. Nothing about managing threats, nothing new or innovative. Just, we will make it a National Park. We will mis-represent the IUCN Protection Levels to attempt to justify our

proposal. Oh, and expand the regional parks area and concentrate a whole lot of activities into them. This is despite some of the existing and proposed Regional Parks have threatened EVCs and fauna in them. In some cases far more endangered than parts VEAC want to make into National Park.

Why isn't the **existing CAR system** being recognised and built upon where needed?

> The West Victoria RFA was signed on 31 March 2000. It encompasses part of the Central West Investigation area including the Mount Cole and Pyrenees range state forests and Wombat State Forest. The RFA established a comprehensive, adequate and representative (CAR) reserve system based on the nationally agreed JANIS criteria for the protection of biodiversity, old growth and wilderness. The criteria included reservation of at least 15 per cent of each forest type that existed before European arrival, and at least 60 per cent of old growth forest. The heritage values of forests were also protected. This process added the Pyrete Range to Lerderderg State Park and created Special Protection Zones within other forests across the Central West Investigation area.

It must be kept in mind that the whole reserve system is there to ensure there is a reserve system in place in the event of logging. The VEAC justification for the National Park proposal is the apparent threat of logging and mining. It has put forward a position that suggest watering down and compromising the whole National Park status, to allow what we have been told by VEAC and the VNPA, that "all the recreational activities in a National Park are EXACTLY the same is in a State Forest."

In reality there are no NP or Regional Parks in Victoria that currently allow the activities that VEAC are saying Parks will allow in the Wombat NP. Firewood collection is not allowed in any Regional Park in the State and calls to Parks Vic confirm they do not allow it. A tornado that tore down from Eganstown to Daylesford a few years back and took the top half off hundreds of mature trees in the Hepburn Regional Park. Attempts for permission to salvage the snapped off top half of trees were denied by Parks Vic. This is not correct.

Again I ask why this blinkered march towards a national park when you are putting forward a position that waters down the status of national parks and regional parks, to accommodate what you have identified as activities that currently happen in the Wombat State Park, including recreational activities as well as forestry management activities, because of the bogey person threats that are in some people's minds?

Why not make recommendations for the Minister to excise the Wombat Forest from VicForest's areas available? At the same time commercial mining can also be disallowed. Then all of the questionable watering down of the NP status is not needed. Something new something that can be based on a forest restoration and recreation management plan.

The return on the accruing carbon credits (when they are introduced) would pay for a lot of the restoration works. 50 000 hectares of forest growing at approx. 2.0 cubic meters of bio-mass (approx. 1.5 to 2.0 tonnes of carbon) at the current rate of $13 per ton returns approx. $970 000 to $1 300 000p.a.

VEAC has made the proposals for the raft of activities normally banned in NP to be adopted by the Minister and then it is up to Parks Vic to agree to allow then, to allow them permanently. And if the Minister or Parks Vic decide in 12 months, 2 years or ten years' time to ban all of these, what are the

alternatives VEAC? Where do we get firewood for instance? What will the fate of the forest be in the light of climate change?

Who would be held publicly accountable if the raft of 'allowances' in NP that are recommended are in fact not permitted?

While it is all good to concentrate of species in the Wombat, it is the structure of the forest and its ability to continue supporting the current biodiversity is what the most important factor is. If the forest dries out and we lose the current eucalypt species and it changes to box-ironbark or a transitionary mix of species, how many of the current tall wet forest flora and fauna will be viable in the new forest?

This is way we need a land status and management that works to keep what we have. I will delve into this later in the submission.

Firewood

Show us that you are an environmental organisation and investigate were these firewood woodlots you make references to being in someone's submission. Where are they? How much capacity have they, how are they grown, where are they grown, how are they harvested?

I have worked on projects that looked at woodlots in western Vic. There are some sugar gum coppice windrows on farms in the west but these do not amount to much volume and could not supply the Wombat community for more than a few months.

So VEAC what other sources are there? Red Gum, coming from land clearance in southern NSW? Often stolen from areas that now have aboriginal custodianship? Plus carbon miles in transport into our region.

The Central West Investigation proposal is saying we locals will get firewood from the regional parks. I repeat that enquiries made by the community to Parks Vic about getting firewood from regional parks has been met with a flat "we don't allow firewood from Regional Parks, which happens under DWELP and in State Forests."

The proposal has mentioned making attempts to get volume of firewood data but not been successful due the removal of firewood permits. There is historic data on firewood volumes that was collected under the permits system. The average volumes were between 7 000 and 10 000 m3 p.a. from the Wombat.

The proposal is for us to collect firewood from the regional park. If the Hepburn Regional Park is made available it would mean cutting firewood in a much more threatened EVC than the Wombat (box-ironbark). Large parts are inaccessible to vehicles. The area is depleted of most ground timber so doers VEAC suggest that trees will start to be felled to provide firewood? In an area that is now a Special Protection Zone.!

The newly proposed regional park between Trentham and Blackwood appears to be were the local will be told to source their firewood. So if we use the historic volumes of even 7 000m3pa, in an area that is too steep for access in large parts, has uncapped mine shafts peppered throughout it. It contains more threatened EVC's that the herb rich foothill. To supply the communities consumption

of a local renewable energy source, and based on the historic volumes, my maths says that every tree that is accessible will need to be cut down over the next 7-10 years.

What agency would ethically be creating a Wombat Forest Sacrifice Zones? These are what VEAC are creating with the concept of modifications to what are acceptable in regional parks and the attempt to shove all activities into them!!!!

In other words the VEAC solution to locals that have no access to natural gas, some no access to mains electricity and have built their homes to be heated, and in many hot water and cooking are all done with fire. Suggesting that this area can supply firewood into the future is not an environmentally sustainable solution. It may not matter to VEAC folk living in the city with services to your doors, to make claims that we will be able to get firewood into the future. Maybe you don't really give a shit on the premise you will get our Trump inspired national park and once that is in place all those locals and users we don't really like can just be told "you can't access it any more. Live with it." And you can still go home and your lives go on un-effected.

I do care and I do care where my energy comes from, I don't want it from someone else's forest, I don't want redgum that is stolen from aboriginal land or from land clearance. The current dispersed collection that happens as a bi-product of thinning or road works or fire preparation is spreading where it comes from across the forest landscape. I challenge VEAC to show me an impact from private firewood collection in the Wombat.

I give the proposal a fail on it solution to firewood collection.

Boundaries and National & International Programs

The VEAC Central West Investigation is based on ad hoc boundaries around the three areas. These are not aligned with any of the State or National land category or management boundaries but the Wombat area is very close to a study area and push for national park by VNPA and done by the so called Wombat Community Representative.

Below are extracts from the IBRA home page where they clearly state everyone needs to work within the IBRA bioregions or sub-bioregions. One of the challenges that exist nation-wide are the plethora of land management boundaries being used across the country. This is making a lot of land management decisions and strategies difficult to implement. This is possibly the cause for what appears to have been an instance of false and misleading public comments made by a VEAC Councillor during the State election. In this case the Councillor possibly failed to appreciate that the Wombat investigation area is a sub-set of the broader bio-region and the data referred to was for the whole bio-region. This is a good example of the issues once to work within the national eco-system boundaries. Hence there is a national push for all of the various land categories to be aligned with the IBRA Bio-regions-

IBRA HOME PAGE

Protection levels of bioregions

All 89 Australian bioregions have some representation in the National Reserve System, with 61 bioregions having more than 10 per cent protected and 28 bioregions currently at less than 10 per cent. Some bioregions already have much of their total area protected, while other bioregions, such as those with large tracts of cleared land, have very little area protected.

The bioregions and subregions are the reporting unit for assessing the status of native ecosystems and their level of protection in the National Reserve System. In this way, IBRA is used as a dynamic tool for monitoring progress towards building a comprehensive, adequate and representative 'CAR' reserve system. Such information assists governments to decide how to best prioritise funding to meet national protection targets. IBRA is also used in the monitoring and evaluation of the Australian Government's natural resource management initiatives.

It would have been better for the entire Central Victorian Uplands to have been reviewed (in the case of the Wombat Forest part of the investigation). This would have put the WF into the context of the nationally aligned boundaries. Once the Central West Investigation departed from this is has had to use lists that are for the sub-bioregion and somehow tease out relevant data for the Wombat Forest.

It is an interesting coincidence that the 3 study areas in this investigation are the ones that VNPA and some on the consultative committee have been campaigning on. The boundaries are very similar to VNPA commissioned studies. Why have these been the ones that have turned up to be investigated and NOT the relevant Bioregion they are in???????????????

This is another factor that leads to the conclusion that VEAC has lost its Independence and is compromised and will not pass the infamous 'pub test' or a probity test. The table inserted a few pages down shows the VNPA and past Parks connections across VEAC and the Consultative Committee. The shallowness of the Central West Investigation, the lack of evidence based assertions, the boundaries that do not align with bioregional boundaries, the non-conforming application of the IUCN Protected Area Categories, the misrepresentation of analysis of first round submissions all culminating with the national park recommendation, calls into question exactly what is going on in VEAC.

Bioregions

The national and regional planning framework for the systematic development of a comprehensive, adequate and representative 'CAR' National Reserve System is provided by the Interim Biogeographic Regionalisation for Australia (IBRA). IBRA was developed in 1993-94 and is endorsed by all levels of government as a key tool for identifying land for conservation under Australia's Strategy for the National Reserve System 2009-2030*. The nationally agreed regionalisation was published in Thackway and Cresswell 1995, An Interim Biogeographic Regionalisation for Australia: a framework for establishing the national system of reserves.*

Protected Areas

I will start this section at an obvious point- In order to claim the need to protect VEAC needs to substantiate that there is a REAL threat to the Wombat. By this I do not mean a small cluster of individuals that masquerade as 'environmentalists' but only display the philosophy of NIMBY's. In that I mean they become the human analogue of Chicken Little at the sniff of anything they decide is a potential threat to the Wombat. They use mobile phones and computers, that all contain gold, but don't want gold produced in heavily regulated first world countries, ignoring the massive environmental and social impacts happening today in South America, in New Guinea, in Africa & Asia where whole mountains, whole habitats, whole river systems and whole villages (usually first nation people) are wiped away or murdered.

They ignore that our local communities do use wood. The only wood available in our local hardware's are from 3 sources- Tropical rainforest timber (orangutan habitat), Australian hardwood from either Tasmania's temperate forests or east Victoria's forests (leadbetter possum) or from industrial, mono-cultures that are totally reliant on environmentally dangerous chemicals, toxins and pesticides.

The group I allude to do not give a toss about any of the above environmental and social impacts because they are not in their 'backyard'. This was said in a tour of the southern wombat in the mid 2000's by Wombat the consultative committee community representatives. "I don't care where it comes from as long as it as long as it is not the Wombat."

I must say that VEAC also fails to nominate where our replacement resources will come from so the community can carry out environmental assessments of these locations. Must be easy to live with a that sort of environmental and social morality.

Having said that I repeat that the Wombat Forest should be excised from the VicForests estate. I have fought against the industrialisation of the environment for 30 years. This is why I am a founding Director and Chair of Forest Stewardship Council Australia. Because I do care where our alternative timber comes from and how it is managed.

I have no problem with windfall and trees from roadwork's going to the local mill for local to buy.

Now back to threats to the forest. At the Trentham meeting from VEAC misled the meeting in a response to a nimby about Vic Forests saying they were going to log the Wombat. I have been at an event with from VicForests who made it absolutely clear that they recognised that the Wombat has a special connection with the local community and would "NOT LOG IT UNLESS INVITED TO BY THE COMMUNTY." This is reflected in their submission to the first round of the Central West Investigation.

Working on the basis that we are told that VEAC reads all submissions, and confirmed when I challenged fter the Trentham meeting, to tell that meeting that Vic Forests were planning logging in the Wombat to take 10 000m2 pa was false and misleading.

So as VicForests submission says "the threat to the Wombat exists only if the community invites logging."

In terms of mining, the gold from Daylesford to Blackwood has been taken 100 years ago, there is nothing there that is commercially viable. Proof, the Able's Reef proposed mine did not go ahead on economic grounds and research that showed the gold was gone. The proponent spoke to a local contractor who has done assaying for mining companies across the potential areas of the Wombat south of Daylesford over the Past decades, who confirmed there is not gold worth mining.

So again what is the REAL threat that VEAC claims is there?

Now onto the VEAC proposal-

VEAC appears to be blinkered to "protection" means locking up an area. That only the first 3 types of protection status are used by the IUCN. It has been stated by a VEAC staff member in a consultation setting that these are the only categories that are acceptable to achieve protection.

I have contacted both the IUCN and the Commonwealth Department of Environment & Energy to confirm the claim that only the first 3 categories are accepted as contributing to the National Reserve System. The IUCN are adamant that the categories listed below ARE NOT a hierarchy and should not be applied in this manner and that all are acceptable for meeting the IUCN targets. The Commonwealth DE&E confirmed the same position and had not heard of any agreement or otherwise that the top 3 are the only ones they accept in the case of Victoria.

Category Ia- Strict nature reserve: protected area managed mainly for science

Category Ib- Wilderness area: protected prea managed mainly for wilderness protection

Category II- National park: protected area managed mainly for ecosystem conservation and recreation

Category III- Natural monument or feature: protected area managed for conservation of specific natural features

Category IV- Habitat/species management area: protected area managed mainly for conservation through management intervention

Category V- Protected landscape/seascape: protected area managed mainly for landscape/seascape conservation and recreation

Category VI- Protected area with sustainable use of natural resources: protected area managed mainly for the sustainable use of natural ecosystems

The following information comes from the IUCN document: Guidelines for applying protected area management categories (PDF document)

"The IUCN states that the categories are <u>not to be viewed as a hierarchy in terms of quality, importance or naturalness, as all are important in their contribution to the system of protected areas.:"</u>

The Commonwealth <u>Dept Environment & Energy</u> National Reserve System web page' views on what 'protected areas' are does not align at all with the position that VEAC is pushing or has decided to implement. In my view the decision by VEAC to only consider the first 3 categories has no credible basis other than it fits into what appears to be their aim of National Parks only. WHY?

Below is what is said about Protected Areas by the Commonwealth-

The National Reserve System

The National Reserve System, with its network of protected areas, is conserving our biodiversity and protecting our ecosystems. <u>These protected areas are managed to reduce threats such as wildfire, weeds and feral animals.</u> The reserve system is building more resilient landscapes that will provide refuges and wildlife corridors for plants and animals to adapt as climate change alters their existing habitat.

<u>Protected areas are not locked away or isolated, but are a valued part of our land use. They provide a range of social, economic and scientific benefits, from healthy outdoor activities to new eco-tourism businesses for regional economies.</u>

Adapting to climate change

The values and many benefits which society derives from protected areas will be dramatically affected by climate change. In turn, they are the essential core lands of any adaptive response to secure Australia's biodiversity.

The IUCN World Commission On Protected Areas, Australia And New Zealand

Building resilience

The National Reserve System is Australia's natural safety net in the face of threats from climate change.

Healthy, functioning and resilient environments are our best defence against a changing climate. Protected areas build resilience by controlling other habitat threats such as weeds and feral animals, by managing water resources and regenerating vegetation. They form a buffer against the impacts of climate change, providing refuges for species to survive and adapt, reducing the extinction risk for our native species.

By creating these havens across the landscape, the National Reserve System is providing the best conditions for Australia's native plants and animals to adapt to climate change.

The vast protected areas in arid Central and Western Australia, home to a wide range of fauna and flora, are resilient self-sustaining ecosystems in themselves. However along the agricultural zones of the south-western and eastern seaboards, the country is fragmented by land clearing, extensive pastoralism and intensive agriculture. Here the reserve system is

building resilience by extending and linking protected areas to extend habitat ranges, to increase connectivity, protect water catchments and to reduce soil erosion.

Storing carbon//*The National Reserve System also plays a vital role in storing carbon. More than one-quarter of Australia's above ground biological carbon stock, some 20 million hectares of international Kyoto forest, lies in our protected areas. This part of our Kyoto forest accounts for 1.5 billion tonnes of carbon, equal to 5.5 billion tonnes of carbon dioxide - more than the total emissions produced by Australia in a decade.*

Making sure this carbon stays put is a management priority. Around the world, to avoid even faster global warming, management to retain and enhance carbon sinks will play a critical role in climate change mitigation. By reducing soil erosion, disease, wildfire and feral damage, and by regeneration and rehabilitation, National Reserve System managers are protecting and increasing our massive carbon stocks.

Scientific research

In addition, many protected areas in the National Reserve System are centres of scientific research, providing important data on how native species are coping with changes in their environment. This data is the foundation for future adaptation strategies.

Water resources

Australia's future prosperity lies in the management and wise use of our water. The National Reserve System is an important tool in the national endeavour to protect the water resources of the driest continent on earth.

A vital part of Australia's water management involves protecting terrestrial and wetland vegetation. Increased plant cover helps hold moisture longer and slows down the drying of soils. The native vegetation cover of our protected areas also helps control water tables, preventing rising salinity from destroying the productivity of the land

These reserves provide a shield against natural disasters such as floods and storm surges, protecting floodplain forests and woodlands, freshwater wetlands, mangroves and coastal wetlands.

Healthy ecosystems provide many benefits for water flow and quality. The vegetation in wetlands and rivers slows down the flow of water, giving particles of mud and pollution time to settle on the bottom. Without them cities and towns downstream would not get the same clean, clear water that they rely on.

Some of our most important water catchments, such as the Blue Mountains in New South Wales, are protected within the National Reserve System

/In the face of protracted droughts and long-term climate change, protected areas have a vital role to play in conserving our water resources. The protection of coastal environments and critical aquatic habitats is one of the six national priorities under Caring for Our Country.

Best Practice Guidance on Recognising Protected Areas and Assigning Management Categories and Governance Types by Sue Stolton, Peter Shadie and Nigel Dudley Guidelines for Applying Protected Area Management Categories-

Protected area establishment and management

A protected area is a clearly defined geographical space, recognised, dedicated and managed through legal or other effective means to achieve the long-term conservation of nature with associated ecosystem services and cultural values.

All Australian governments have agreed to minimum standards that protected areas must meet to be included in and managed the National Reserve System.

The land must be designated a 'protected area' to be conserved forever, with effective legal means guaranteeing its perpetual conservation.

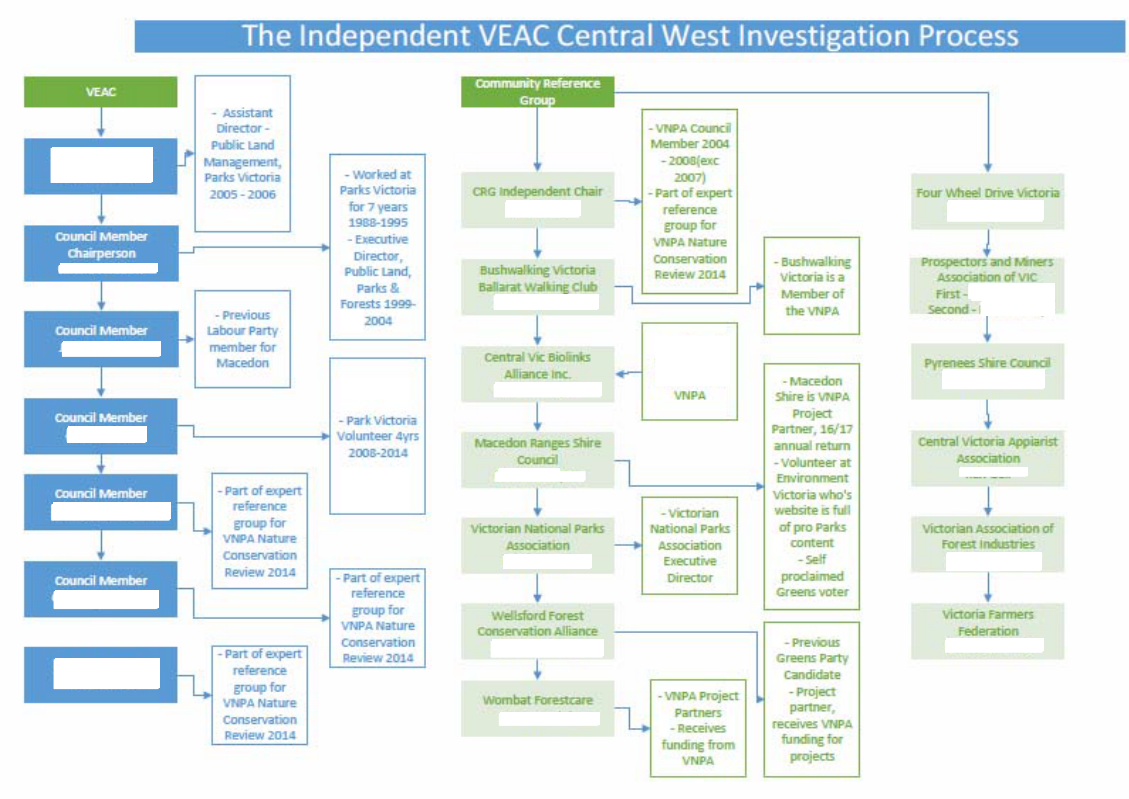
The land must contribute to the comprehensiveness, adequacy and representativeness (CAR), of the National Reserve System - in other words it must meet certain scientific criteria and strategically enhance the protected area network. See the National Reserve System scientific framework for more information

The land must be managed to protect and maintain biological diversity according to one of six international classes developed by the International Union for Conservation of Nature (IUCN). The six-level system classifies protected areas according to their management objectives, which range from strict nature conservation to multi-use reserves (objectives must not be inconsistent with the primary purpose which is biodiversity conservation)

Areas managed mainly for: I Strict protection [Ia) Strict nature reserve and Ib) Wilderness area] II Ecosystem conservation and protection (i.e., National park) III Conservation of natural features (i.e., Natural monument) IV Conservation through active management (i.e., Habitat/species management area) V Landscape/seascape conservation and recreation (i.e., Protected landscape/seascape) VI Sustainable use of natural resources (i.e., Managed resource protected area) The 1994 guidelines are based on key principles: the basis of categorization is by primary management objective; assignment to a category is not a commentary on management effectiveness; the categories system is international; national names for protected areas may vary; all categories are important;

Here is the Commonwealth web page on the adoption of the IUCN Protected Area Management. Like the above extracts it does not limit what counts as only the first 3 categories. Where has the false and misleading position being purported by VEAC that only the first 3 categories are what they will consider???????

There is a strong community question mark over VEAC's independence. The family tree if individuals that have or have had association with the Victorian National Parks Association, of organisations or individuals on reference committee for the Central West Investigation who have received funding from the VNPA. We are deeply concerned at VEAC's impartiality and objectivity given the VNPA connections. Even if there is no interference it is not a good look. See table next page.



The subjective nature of the Central West Investigation proposal and the non-evidence based leaps of logic to support the national park option has only reinforced this. The locality based consultative committee members has not consulted with the broader community they purport to represent. This is clear from the massive questions about the process that has arisen and how mis-aligned the proposal is with the true broad community sentiment.

This is the risk when any organisation sets up an echo chamber of like-minded and aligned people. You fail to really know the true community views. ECHO CHAMBER her we come! This could be a contributing factor to why the Central West Investigation has missed the mark.

The proposal should have had a number of options for the future of the Wombat Forest. It would have focussed the public's focus and good relevant feedback on the merits or otherwise. A single option is what a final recommendation should be doing. A proposal should be argues options. Was there a fear that the head long rush to a national park might have to be justifiable? In this case it would have to stand against the other options. It make whatever is the best evidenced based and socially accepted option stand out and all can see the logic. The CWI Proposal doesn't even justify itself against evidence based assessment.

Is this why the IUCN and Commonwealth Protected Area System has been unjustly trimmed to suit the pro national park options being pushed? Objectively an examination of the existing and formally in place CAR reserve system should have been the starting point for the investigation. Additions could have been made to expand the reserves based on real threats. This would have allowed the forest to be managed and restored to stabilise and improve the Wombat in light of the National

Protected Area objectives of managing climate change, building resilience, storing carbon, improving catchment and water values as well as protecting and enhancing bio diversity values.

The Victorian Environmental Assessment Council's proposal to make the Wombat Forest into a national park is the wrong direction for the Wombat Forest on environmental and social VEAC has failed to use a vast resource in studies, data, records, knowledge reports, consultations etc that are available on the Wombat Forest.

There are important GIS information sets that could have given a clear overview of the forest, its values, its economics, its social connections. Why there isn't an EVC map with rare, threatened and endangered over laid? This would allow us to look at the existing reserve system whether they are adequate. I add need for protection implies there is a threat. Which there is not. It's too politically contentious to attempt logging.

Category vi (see below) would align with the IUCN, The National Reserve System requirements without having to make all of the caveats and allowances not normally allowed in national parks that would effectively that de-value the protections of national park and set precedents for other national parks.

The thinning trial that was allowed in the box-ironbark only occurred over a few years, in a very small area and the results will not be known for 50 years!!! This is hardly a good example for the raft of allowance VEAC is arguing Parks should allow.

Australia's Strategy for the National Reserve System 2009–2030

IUCN Protected Area Management Categories The IUCN Protected Area Management Categories provide an internationally recognised framework that categorises the variety of protected area management types according to their management objectives (see Table 4).24 The IUCN states that the categories are not to be viewed as a hierarchy in terms of quality, importance or naturalness, as all are important in their contribution to the system of protected areas.

VI Protected Area with sustainable use of natural resources: conserve ecosystems and habitats, together with associated cultural values and traditional natural resource management systems. They are generally large, with most of the area in a natural condition where a proportion is under sustainable natural resource management and where low-level non-industrial use of natural resources compatible with nature conservation is seen as one of the main aims of the area.

Climate Change –

What the science actually says and why VEAC have got it so so wrong in its proposal on the Wombat Forest in regards to Climate change and using fire or doing nothing as a legitimate response to ensure the future of the Wombat Forest.

I have used a number of articles talking about current research and the impacts of climate change on eco-systems, biodiversity, hydrology….

The first is a timely article from the Conversation by Sarah Boutler that is a good introductory summary of where the climate change game is at based on an evidence based look at impacts. I note here that the VEAC Central West Investigation is very light on the use of an evidenced based investigation and recommendations. It takes less that 30 minutes on Google to quickly find credible science that makes VEAC's TRUMP approach to the future of the Wombat Forest dangerous!

The extracts below are a good summary of an approach I assumed the VEAC Central West Investigation might have taken. I do not understand why VEAC has not used the mountains of information available to it regarding the Wombat Forest. The process and information needed, the way consideration is given to all aspects of the region and its eco-systems, impacts, threats etc.

I have done a simple desktop search on climate change forests Australia.

So let's look at some climate change science

Sarah Boulter- *Research Fellow, National Climate Change Adaptation Research Facility, Griffith University*

The Conversation-*12 Nov 2018*

Climate change and those whose job it is to talk about current and future climate impacts are often classed as the "harbingers of doom". For the world's biodiversity, the predictions are grim - loss of species, loss of pollination, dying coral reefs.

The reality is that without human intervention, ecosystems will reshape themselves in response to climate change, what we can think of as "autonomous adaptation". For us humans - we need to decide if we need or want to change that course.

For those who look after natural systems, our job description has changed. Until now we have scrambled to protect or restore what we could fairly confidently consider to be "natural". Under climate change knowing what that should look like is hard to decide.

Of course, this is not to say the balance should be flipped, but climate change is challenging our politicians, planners and us as the Queensland community to take responsibility for the effects our choices have on our biodiversity and ecosystems. As the pressure increases to adapt in other sectors, we should

seek options that could help – rather than hinder – adaptation in natural systems.

Changing ecosystems

It's a similar story for species and ecosystems that specialise on cool, high altitude mountaintops. These small, isolated populations rely on cool conditions. As the temperature warms, if they can't change their behaviour (for instance, by taking refuge in cool spots or crevices during hot times), then it is unlikely they will survive without human intervention such as translocation.

The Commonwealth Dept. of Environment & Energy has some very clear points in relation to our natural environments and climate change. Their clear message is climate change is about management NOT locking areas up and hoping for the best. I have underlined the relevant sections on this below-

Australian Government
Department of the Environment and Energy

Australia's protected areas

Protected areas are the best available means to ensure the recovery and survival of our threatened native animals and plants.- WWF – Australia/

Protected areas conserve the healthy ecosystems that sustain human life. Our food and water, our agricultural industries and much of our infrastructure all rely on healthy functioning ecosystems.

CSIRO has estimated the value of Australia's ecosystems, its air, water, forests, flora and fauna at more than $1,300 billion per year.

For example, protected wetlands and water catchments purify the water we drink. Forests and plant life filter and oxygenate the air we breathe, native vegetation helps protect against floods and soil erosion. Healthy functioning ecosystems help plant pollination and seed dispersal. Healthy ecosystems also help maintain our biodiversity: the genetic diversity and resilience of our flora, fauna and micro-organisms.

Since European settlement, landclearing, grazing, urban development, changed fire regimes, agriculture and irrigation have all impacted on our ecosystems. Human activity has fragmented the habitats of our native plants and animals. The introduction of invasive weeds and animal predators has compounded the challenges. There has been a dramatic decline in the number and distribution of our native species and in some cases, extinction.

The National Reserve System, with its network of protected areas, is conserving our biodiversity and protecting our ecosystems. These protected areas are managed to reduce threats such as wildfire, weeds and feral animals. The reserve system is building more resilient landscapes that will provide refuges and wildlife corridors for plants and animals to

adapt as climate change alters their existing habitat.//Protected areas are not locked away or isolated, but are a valued part of our land use. They provide a range of social, economic and scientific benefits, from healthy outdoor activities to new eco-tourism businesses for regional economies.

Adapting to climate change

The values and many benefits which society derives from protected areas will be dramatically affected by climate change. In turn, they are the essential core lands of any adaptive response to secure Australia's biodiversity./

The IUCN World Commission On Protected Areas, Australia And New Zealand

Building resilience

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Healthy, functioning and resilient environments are our best defence against a changing climate. Protected areas build resilience by controlling other habitat threats such as weeds and feral animals, by managing water resources and regenerating vegetation. They form a buffer against the impacts of climate change, providing refuges for species to survive and adapt, reducing the extinction risk for our native species

/By creating these havens across the landscape, the National Reserve System is providing the best conditions for Australia's native plants and animals to adapt to climate change.

The vast protected areas in arid Central and Western Australia, home to a wide range of fauna and flora, are resilient self-sustaining ecosystems in themselves. However along the agricultural zones of the south-western and eastern seaboards, the country is fragmented by land clearing, extensive pastoralism and intensive agriculture. Here the reserve system is building resilience by extending and linking protected areas to extend habitat ranges, to increase connectivity, protect water catchments and to reduce soil erosion.

Storing carbon

The National Reserve System also plays a vital role in storing carbon. More than one-quarter of Australia's above ground biological carbon stock, some 20 million hectares of international Kyoto forest, lies in our protected areas. This part of our Kyoto forest accounts for 1.5 billion tonnes of carbon, equal to 5.5 billion tonnes of carbon dioxide - more than the total emissions produced by Australia in a decade.

Making sure this carbon stays put is a management priority. Around the world, to avoid even faster global warming, management to retain and enhance carbon sinks will play a critical role in climate change mitigation. By reducing soil erosion, disease, wildfire and feral damage, and by regeneration and rehabilitation, National Reserve System managers are protecting and increasing our massive carbon stocks.

South West Climate Change Portal.

Over geological timescales, even rapid climatic change occurred much slower than the current rate of change. For example, it took centuries for the ice from the last glaciation to decline (about 10,000 years ago). By comparison, in the last century the global climate has changed rapidly, with an increase of around 0.74 °C (1906-2005). Most of this change occurred during the second half of the last century. In Australia, there has been a warming of 0.9 °C each year since 1910 (CSIRO and Australian Bureau of Meteorology, 2014).

Moving forward both mitigation and adaptation action is required. This can be achieved through implementing actions with multiple benefits which increase resilience, maximises the capacity of systems to adapt to change and maximises the storage of carbon within the landscape.

Climate Ready Victoria

The impacts of climate change, such as alterations to habitat and water availability and harsher fire weather, are likely to increase pressure on already threatened species and communities.Victoria is home to many species and ecological communities that are at risk, including the state's faunal emblems: the Leadbeater's Possum and Helmeted Honeyeater. The impacts of climate change, such as alterations to habitat and water availability and harsher fire weather, are likely to increase pressure on already threatened species and communities

https://www.chiefscientist.gov.au/2009/12/which-plants-store-more-carbon-in-australia-forests-or-grasses/

FORESTS

*The amount of carbon taken up every year by dry forests in Australia depends on the weather conditions and age of the trees. Science tells us that the range for forests with continuous canopies is about 0.5-2 tonnes of carbon per year for each hectare. Grasslands may have a similar annual rate of net carbon uptake**[i]**,*

*but the long-term storage of carbon per hectare of grasslands is less than that over an average hectare in woody trees. In other words, over the long haul, more carbon stays in the tree sink than in the grass sink. Some Australian native eucalyptus forests store up to ten times more carbon per hectare than Australian native and introduced grasslands – both above and below ground**[ii]**.*

*The Co-operative Research Centre for Greenhouse Accounting has estimated that Australian forests store about 10.5 billion tonnes of carbon (excluding soil carbon)**[iii]**. This store of solid carbon has accumulated over an assumed life of 100 years for native eucalypt regrowth. That translates to our forests storing an amount of*

carbon equivalent to almost 38.5 billion tonnes of gaseous carbon dioxide from the atmosphere, about 70 times Australia's annual net greenhouse gas emission.

https://theconversation.com/using-forests-to-manage-carbon-a-heated-debate-81363

Young, rapidly growing forests remove atmospheric carbon quickly, but have relatively small carbon reservoirs. Ageing forests capture carbon at decreasing rates, but build up large carbon reservoirs in biomass and soils.

Climate Change Adaption Plan (Victoria)

• *Encourage adaptation action across all policy areas and sectors of the economy by strengthening the consideration of climate change in policy and regulation in health and human services, emergency management, the natural environment, agriculture, water and the built environment. The Government will also introduce a new sector-based approach to adaptation planning, in preparation for sectoral Adaptation Action Plans under the proposed new legislative framework.*

(Tim Anderson note: This supports the concept of creating a new land management category- A Carbon Forest)

The Adaptation Plan explains the Government's current and ongoing responses to the impacts of climate change, and outlines new initiatives that will build Victoria's capacity to adapt to climate change now and in the future. The Government is committed to delivering these actions, and will apply a best practice monitoring and evaluation framework to measure our progress over the next four years. Government action will evolve over time as our understanding of the risks and impacts of climate change improves. However, the Adaptation Plan is an agenda for action now to help all Victorians meet the challenges of climate change.

5.3 Managing impacts on the natural environment *Victoria's rich and varied landscapes sustain diverse ecosystems. Victoria's alpine, mallee, grasslands, grassy woodlands, forest, heathlands, inland waters, estuaries, and coastal ecosystems are home to many thousands of species of plants and animals. Some of these species are found nowhere else in the world. The effects of climate change on the natural environment will vary across regions and ecosystems, and may be severe. It is likely that climate change will cause irreversible changes to ecosystems and species.13 Plants and animals will be affected by heat stress and drought, and by changes in the numbers and composition of introduced species such as weeds and pest animals. Extreme weather events, changes to the frequency and intensity of fires and long-term changes to the climate may cause the distribution of habitats to change and will affect species composition. Freshwater flows and levels will also change. Once species or ecosystems disappear, they may never come back. Rich and thriving biodiversity (5.3.1) is a vital part of a healthy environment, and must be protected for its own sake. Victoria's remarkable parks nurture and protect biodiversity, and spending time in these beautiful natural places makes us healthier and happier. The natural environment is intrinsically linked to Aboriginal cultural heritage. Our parks also protect many heritage sites and are an*

important part of the Victorian tourism industry. Many Victorian communities depend on the natural environment to support local industries. All of these qualities that we value in our natural environment are under threat from climate change. Some areas in Victoria are particularly vulnerable, including coastal areas (5.3.2) and the alpine region (5.3.3).

North Central CMA Climate Change Adaption Plan

6.5.2 Upper catchments in the region's south This area takes in areas associated with the upper catchment of the Loddon and Campaspe Rivers, in close proximity to regional centres including Daylesford, Kyneton and Trentham. Characterised by general higher rainfall and better soils, this landscape has been historically important for mixed farming and horticulture and contains significant areas of public land such as the Wombat State Forest. Like the box-ironbark landscape, it is undergoing major demographic shifts as land values increase for amenity and lifestyle living, at the expense of traditional farming activities. The strategic options for the upper catchments are: • Support programs that aim to reduce fire risk to communities and natural assets across public and freehold land. • Introduce codes of practice that reduce demand for water and support self-sufficient water use (both agricultural and semi-urban properties). • Establish large-scale carbon sequestration by planting biodiverse plantations/trees on poorer soils or along the riparian zone.

7.1. This suggests that high rainfall plantings will give the best short-term benefits but that slower growing plantings subject to minimal harvesting may take over as good long term sinks for carbon (Polglase et al., 2011). It is also important to appreciate interactions between revegetation, water and climate change. The potential impacts of climate change include reduced runoff, streamflow and ultimately, security of water supply, due to lower rainfall and higher evaporation. Even where rainfall does not change significantly, higher potential evaporation will still contribute to net decreases in runoff. As has been demonstrated in other high rainfall catchments, revegetation will reduce runoff independently of climate change, but will add to the losses caused by climate change (Jones et al, 2006). The potential for adverse impacts, such as reduced water yield, increased risk of wildfire and reservoirs for pest plant and animal invasion should be considered in the context of revegetation programs.

VEAC's own Remnant Vegetation Investigation supports our position in the NEED for restoration/thinning.

Remnant Native Vegetation Investigation- VEAC//Central Victorian Uplands

However, more than for these comparable bioregions, the generally poor condition of remnant native vegetation in the Central Victorian Uplands suggests that there is greater need for extra management effort to arrest further degradation and pro-actively improve condition,

https://academic.oup.com/treephys/article/31/9/893/1676008

Oxford Academic

Establishment and management of forests to enhance the removal and storage of CO_2 from the atmosphere are recognized as major opportunities to offset the increase in anthropogenic emissions of greenhouse gases and reduce the rate of global warming. Clear evidence of the role of forests in regulating global atmospheric CO_2 partial pressure is provided from long-term measurements made at sites isolated from local sources or sinks

When old forest is removed and a catchment is left to regenerate into regrowth forest, there is an immediate increase in water supply because of the reduction in evaporation of intercepted water. However, water supply is then likely to decline with forest regrowth to levels less than those for the old forest for a period of up to several decades (Vertessy et al. 2001). For example, Macfarlane et al. (2010) estimated increases in water use by the trees (equivalent to reductions in water supply) following conversion of old to regrowth Eucalyptus *forest in Western Australia from 20 to 44% of annual rainfall and attributed this to differences in sapwood conducting area and leaf area. However, reduction in leaf area index with increasing age in* Eucalyptus *stands can lead to increases in water supply from older stands (Almeida et al. 2007).*

Australian Government Dept of the Environment and Energy

Environment

The 2016 State of the Environment report found climate change is one of the main pressures on the Australian environment and exacerbates other pressures including land-use change, habitat fragmentation and degradation, and invasive species.

Climate change, particularly rising temperatures, increases the impact of these existing pressures, undermining the resilience of native species.

Scientists expect climate change to cause changes to the abundance and geographic range of many species, restrict or alter species movement and interfere with their lifecycles (such as the timing of germination). Climate change presents a biosecurity risk for Australia's ecosystems by altering the distribution of pest and weed species.

Ecosystems have a limited capacity to manage these multiple pressures compared to human systems. Rates of climate change, together with other pressures, limit the capacity of species to adapt in situ or migrate to more climatically suitable areas, where such areas exist

The science on climate change, forests and the best ways to prepare for the changes say we need to restore restore restore. What the CWI doesn't do is restore. I cannot accept such a dangerous gamble with the future of the Wombat Forest and so reject and will fight against a Trump national park.

Catchment/ Water Values

The Wombat is arguably one of the most important forest catchments in the State. It contributes water supplies approx. 1 million domestic users, irrigators in catchments that are up to 100% allocated and other commercial use.

Numerous reports have ben produced on the forest water equation. Including the Cooperative Centre For Catchment Hydrology, ANU & Melbourne University. Below is a report by

Forest hydrology is well researched and a technical paper was done on the Wombat Forest by Pat O'Shaughneesy, Tim Fletcher &Leon Bren on the harvesting effects on water yield in the Lerderderg catchment. This was commissioned in response to Wombat Forest Society's public concern on water given the intensive logging that was taking place. The repot and graph shown below show the long term modelled water equation.

We are at the lowest point on the graph now based on the logging history. The photo below shows the density of the regrowth. They are 30 year old trees. Unless we thin the forest we will loose it. It would be tragic and ironic if VEAC's national park recommendation proved to bring about 6 catchments to collapse.

Water yield is important jusr for the health of the waterways. The water from the upper catchments are cool, clear and dilute the salt entering the waterways mid catchment .

A REPORT ON THE EFFECTS OF FOREST HARVESTING ON WATER YIELD AND QUALITY IN THE LERDERDERG CATCHMENT

Prepared by Pat O'Shaughnessy, Tim Fletcher and Leon Bren

for

Department of Conservation and Natural Resources Forest Management Branch

Left is the yield curve from the report for the Lerderderg Catchment in the Wombat Forest.

The suggested curve is outlined in Figure 1, below.

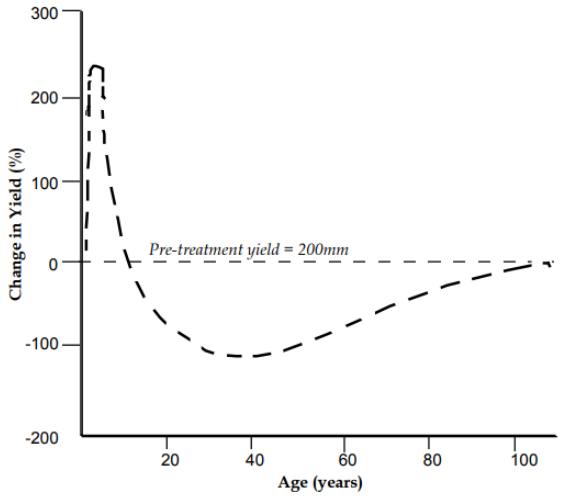


Figure 1. Approximate worst case age/yield curve for an even aged mixed species eucalypt forest in Central Victoria

The research shows that we are now in a significant water yield deficit. Add to this the report pre-dates climate change impacts that will reduce rainfall, reduce run off, increase evapo-transpiration, decrease growth rates and likely to stretch out the period for recovery shown in the graph.



Thinning the currently locking up re-growth is vital for catchment values. By this I do no mean burning the forest to thin it. I mean hand thinning young regrowth that are between 25mm and 100 mm in diameter, that are currently stocked at between 5000 and 10000 stems per hectare compared to first non-indigenous historical descriptions of 10-15 trees per hectare when the Wombat was in a primary forest condition.

Given the impacts of 'locking up re-growth' due to overcrowding, that will start to give off carbon and not store it, how will the forest reduce itself from 10 000 stems per hectare down to even 100 per hectare are? Assuming we don't do it by burning it down with a thinning fire.

A rolling program of hand thinning that follows the sequence the forest was shelterwooded would be the most sensible approach. This can use the relative age class GIS information to identify areas that might need thinning. Site assessment can quickly see if the site is locking-up. Those identified are then planned for the thinning. This would amount to between 500-1000 hectares p.a, dispersed across the forest into 40 hectare units. Localised impacts would be almost zero. Some years there may not need to be any thinning.



The programs needs to be done carefully and overt the next 25-30 years. It can be funded via the sale of the accrued carbon credits. These will happen when we get a Federal Government that believes in science and climate change action.

Below is some research on water yield by Rob Vertessy , one of Australia's leading contemporary forest hydrologists. The research was into a mixed species forest with similar attitude and rainfall. It shows the rate of run-off over the aging of a forest. This quantifies and supports the water loss the current state of the Wombat Forest is and will be in. See box below.

Social and Economic Assessment?

Where is the social and economic assessment? Given that visitors to State Forest (unlike Parks) statistically visit the a number of times a year, their input into businesses and the general economy around the Wombat is vital in the equation of this investigation. These would include B&B's, hospitality, cafes, pubs, gift shops, hardware stores, caravan parks, petrol stations etc. What would the reduced visitor number that Parks have do to these businesses. Anecdotally the Blackwood Hotel is kept viable by the weekend forest users as an example.

This vital piece of the investigation needs to be completed and released for public review & comment before there are any final reports produced.

Conclusion

The Wombat Forest needs to become Australia's first Carbon Forest.

Recommendation

The Minister should investigate creating a whole new forest category for the Wombat Forest- the Wombat Carbon Forest. It is time for a new public land category that reflects positive climate change action by thinning the regrowth and thus allowing the forest to store more carbon that its current 'locked' condition is doing. It will improve water yield, restore the forest to a more natural structure, benefiting biodiversity outcomes. Most importantly it will make the Wombat Forest more resilient to projected changes in our climate.

The Wombat Carbon Forest could allow for all of the current firewood collection, recreational and social activities that are currently allowed in the forest. The new category can excise the Wombat Forest from availability to VicForests, and prohibit commercial mining ventures.

This would complement the State Government's actions and commitments to addressing climate change. It would be the first carbon forest in Australia. The carbon credits the government would get from storing more carbon in the Wombat could be used to hire and train young people to do the thinning.

The thinning that needs to occur are not tall trees. The thinning needs to occur in the 'wheat-field regrowth' that is across the forest. There are saplings from finger diameter up to 100mm in diameter and less than 35 years old. The Wombat has approx. 30 000+ hectares in this condition.

This type of thinning will not have any impact on natural values. In fact this thinning will have positive benefits for water production, biodiversity, pests and disease, climate change resilience and fire. The thinning needs to be spread out over the next 30 years. There would only be between 500-1000 hectares done annually. These would be in areas of approx. 50 hectares in size, done as a mosaic across the forest. There would be years where no thinning is required.

Now is the time for Minister D'Ambrosio to think outside of the box. The Minster and the State Government can demonstrate to all Victorians that it is committed to climate change, it is committed to healthy forests and it is committed to providing a range of forest experiences for Victorians.

The failure to produce a broad economic and social impact study based on the impacts of the recommendation has not been made available and we have not been able to make comment in this area. The Central West Investigation needs to be halted and reviewed and the Social & Economic Assessment be released to the public.

What we need here is 'regional reality not urban idealism'. We request that the Minister be prepared to explore innovation in public land management and work towards giving the Wombat Forest resilience against the impacts of climate change at the same time. Create the Wombat Climate Forest.

Tim Anderson was on the Shire of Daylesford & Glenlyon Wombat Forest Liasion Committee, headed up the Wombat Forest Society for nearly a decade. Founder of the Western Victorian Forest Protection Network, He was involved in the Community Forest Management trial and is a founding Director and ex-Chair of the international eco-labelling system Forest Stewardship Council, in Australia. He has just completed 4 years working on the Australian FSC Forest Standard in conjunction with the industry, indigenous representatives and national environment groups.

Please read next section it has a very good tool for this type process.

What would have been a sound and systematic structured approach to the study may have been the following from the South West Climate Change Portal. This is a logical and thorough planning tool that will produce back able outcomes if followed and implemented correctly. This might inform future VEAC processes.

http://www.swclimatechange.com.au/cb_pages/adaptation_pathways.php

What is adaptation pathways planning?

NRM planning needs to be able to justify, prioritise and implement actions, while at the same time recognise and allow for future changes in; climate, environment, values (both social and economic), knowledge, socio-political environment, and climate modelling systems. Adaptation Pathways acknowledges these and allow NRM planners to plan for change and allow for uncertainty. The Southern Slopes Climate Change Adaptation Research Partnership (SCARP) has come up with a list of advantages of adaptation pathways when compared to other existing NRM planning processes. An Adaptation Pathways approaches can allow NRM planners to:

- ***Adopt strategic rather than reactive planning*** *rather than being driven by current policies, conditions and issues, adaptation pathways encourage creative forward thinking about potential and desirable futures.*
- ***Develop an adaptively robust strategy*** *that facilitates to short-term actions, leaves options open, and provides a guiding framework for monitoring the robustness of specific options across possible futures. Sequencing such actions identifies when, why and how to change course and sets the foundations for a 'living' plan.*
- ***Use vulnerability assessments for action planning*** *to address underlying drivers of those vulnerabilities.*
- ***Adopt a social learning approach to adaptation*** *through co-learning among decision-makers, researchers and other stakeholders, issues and problems can be discussed in order to define a greater array of potential options and actions. Adopting a learning approach to planning, aids in greater insights into the current situation and can facilitate identification of more innovative transitional and transformational pathways.*
- ***Facilitate discussions*** *with and among stakeholders about possible adaptation options and pathways preferences.*
- ***More readily recognise potential maladaptive actions*** *- undesirable outcomes can result from a narrow focus on simple cause-effect relationships or assumptions that individual approaches or policies are 'right'. Using a pathways approach can help identify when an option or pathway may shut-down future options, thus reducing plan robustness.*
- ***Support best practice in regional NRM*** *- existing good practice helps to reduce vulnerabilities to climate change impacts, and using pathway planning allows NRM planners to commit to short-term actions within a larger framework that guides the robustness, including flexibility, of future actions.*

The video below provides a summary and a case study to how adaptation pathways can be applied.

Adaptation Pathways consists of five core components (Figure 1 below). As the pathways approach is designed to be adaptive this process can also be flexible. For example, instead of a linear approach that is usually adopted in NRM, a more reflective, adaptive approach can be used.

Figure 1: Five stages of adaptation pathways planning

1. Defining objectives for pathways

As with most NRM planning processes, defining the objective - determining what you want to achieve, is a crucial initial step. Not defining it properly can often unravel all proceeding planning if done incorrectly. Objectives need to be specific, measureable and time framed, and need to relate to an overall goal. Developing appropriate objectives allows better options for developing and evaluating options, as well as providing a basis for monitoring and evaluating all stages of the adaptation pathways planning approach.

2. Understanding the current situation

Knowing as much about the natural asset or landscape that the adaptation pathway is for, provides a basis for analysing potential futures and developing pathways. It can be done in three steps.

1. Analyse the current situation and with historical information reflect on how the asset has been managed. Use this information to develop potential future management options.

2. Determine management actions that may lead to reducing the vulnerability and/or increase the adaptability opportunities for the asset you are developing a pathway for.

3. Identify evidence-based, robust, 'no regret' options.

Understanding the current situation, while acknowledging the past, helps inform how a pathway approach might be best developed.

3. Analysing possible futures

Stage three involves exploring a number of potential futures, and developing various management responses. It is important to acknowledge at this stage other factors influencing a management response, such as future policies, markets and social values. In any case, the future is always going to be uncertain. By developing a range of scenarios, a range of options can be tested and determined if they are robust, flexible or both. The choice or relevance of future analysis methods should be determined by the type of 'problem' the current situation presents.

4. Developing adaptation pathways: identifying and prioritising options

Stage four is the main component of adaptation pathways planning. It identifies potential adaption options and determines the flexibility and robustness of each. Potential turning, tipping and trigger points are identified, and alternate options that can lead to original objectives are determined. This stage is reliant on work done in stages two and three. There are six steps in identifying adaptation pathways for a particular objective:

1. Identify options to address existing drivers of vulnerabilities under current conditions

2. Identify tipping points, turning points and trigger points (see below)

3. Identify alternate and additional options to help address objectives under the range of potential futures

4. Sequence and document potential actions into draft pathways

5. Analyse and evaluate the pathways

6. Finalise and document or map pathways.

Tipping points - what is likely to change in the biophysical system?

These are biophysical thresholds where the magnitude of change means the current management strategy will no longer be able to meet the objectives. Identifying these helps to indicate whether and when other options are needed. An example of a tipping point is when

an estuarine mangrove community, which cannot retreat because of geological or infrastructure constraints, becomes permanently inundated under sea level rise scenarios.

Turning points - what are the plausible 'game changers' in the socio-economic conditions or rules?

These are situations in which a social–political barrier is reached. This may be due to climate change, or changes in formal policy objectives as well as informal societal preferences, stakes and interests. For example, a policy change relating to the mechanism for pricing carbon can lead to landscape-scale changes in re-afforestation with implications for conservation, livelihoods and rural communities. A social threshold relevant to south-eastern Australia may be the point at which too many regional landholders are 'absentees' to effectively enact community-based NRM.

Trigger points—when do we need to start?

Trigger points mark the necessary lead time for action before reaching a turning point. They are also defined by how long a decision to change takes to be made and implemented. However, this aspect of defining trigger points stems from the next stage of identifying alternate options. They are a crucial part of a pathways approach; enabling plans to be strategic and anticipatory, rather than reactive and ad hoc.

5. Monitoring, Evaluation, Reporting, Improvement and Learning

The future is not predictable and as a result, adaptation depends on learning and responding effectively to lessons learnt, as well as experience, changing circumstance and new knowledge. This means a sound Monitoring, Evaluation, Reporting, Improvement and Learning (MERIL) system is fundamental to adaptation, and enabling both adaptive management and governance. Monitoring of key indicators of systems change (e.g. tipping, turning and trigger points) underpins decision-making about adjustments to strategies, operational plans and implementation practices. This includes monitoring the biophysical, social, economic and political systems.