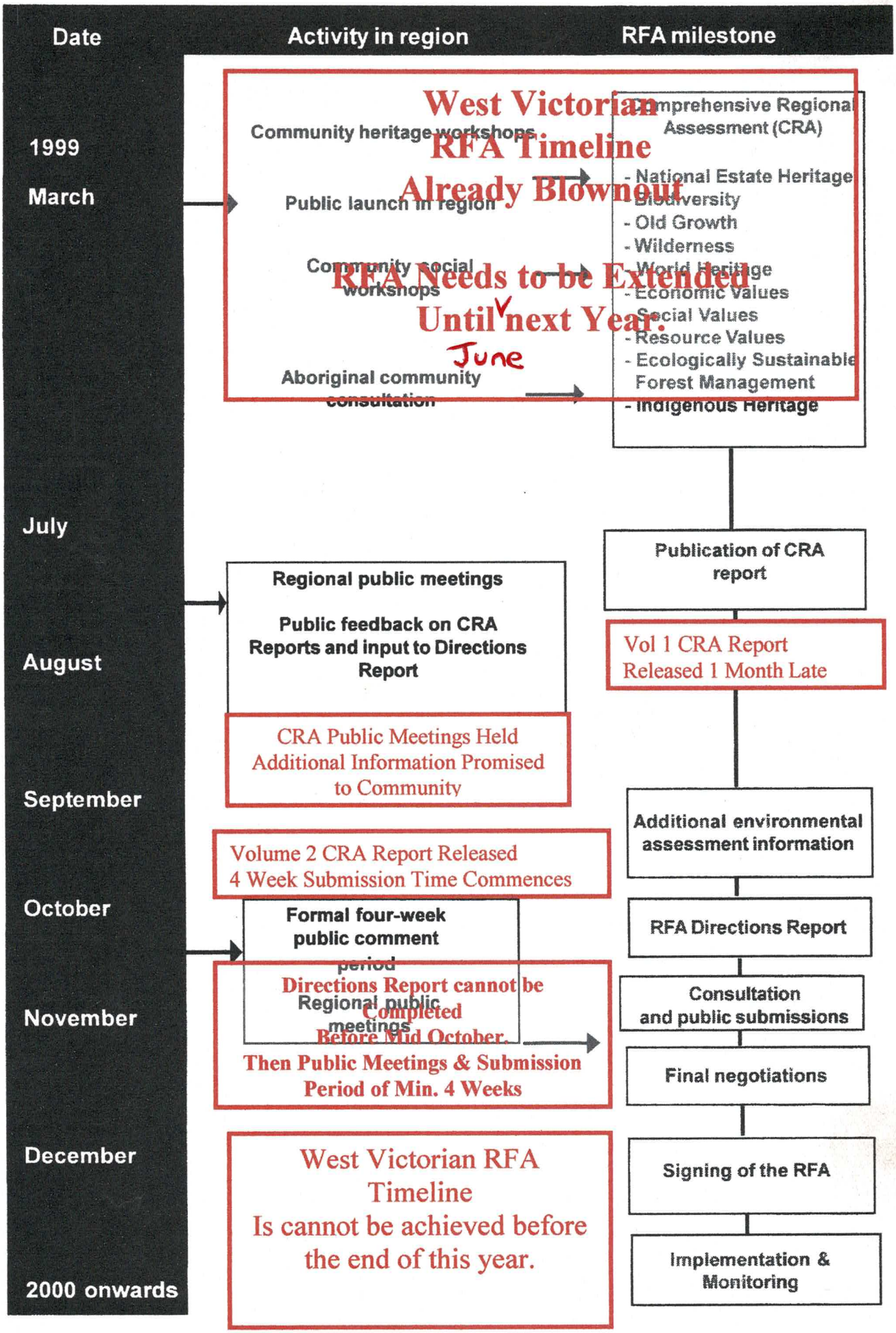
West RFA - timeline



West Victorian Regional Forest Agreement Region
Submission towards Extending RFA Timeline

Western Victorian Forest Protection Network

&

Tambo Environment Awareness Group

Submission for an Extension of the West Victorian Forest Agreement Assessment Period.

In the interests of proper and acceptable Regional Forest Agreement outcomes for the West Victorian and Gippsland RFAs, the timeline for the process must be extended in both these regions. There is overwhelming discontent with the haste and shallowness of the process in these regions.

If the RFAs are to stand up over time, stakeholder groups, government and semi-government Agencies as well as the broader community must have confidence in the quality of the process that underpins all Regional Forest Agreements.

The community and conservation groups from Gippsland and West Victoria's unsatisfactory experience with the RFA process so far will severely undermine the credibility of a RFA, rushing the process will compound this dissatisfaction.

Below are observations collected by a range of interest groups that have participated in the West Victorian RFA and Gippsland RFA regions. The comments below reflect the current thinking of special interest groups as well as some members of Local Government and other land management agencies.

Most of these groups are participating in the current RFA processes. Many of these groups looked on the RFAs as an important process that had the possibility of achieving a higher standard of land and resource management and utilisation practices.

Having recently gone through the first rounds of CRA public meetings and presentation worhshops, these stakeholders and interest groups have found the process to be too rushed, too shallow and lacking in effective feedback.

For the Gippsland and West Victorian RFAs to gain any acceptance within the regions or any settlement of the on-going forest/woodchip debate, the process needs to be thorough and credible. The West Victorian and the Gippsland RFAs need to be slowed down and the processes extended by a minimum of six-months. To ignore this and to rush through these two RFAs by the end of this year will also ultimately leave these RFAs open for future challenge.

Minimum consultation requirements are being 'thrown out the window'.

West Victorian Regional Forest Agreement Region
Submission towards Extending RFA Timeline

Aren't the RFAs meant to define sound ecological and sustainable forest management and timber harvesting rates that are sensitive to all other forest values? The West RFA and the Gippsland RFA will be 'built on poor foundations' if we rush these through.

The realistic political position to take is to legislate an extension to the West RFA and the Gippsland RFA by at least six months.

Timeline a limiting factor

The West Victorian RFA was scheduled as the last RFA region to be done in Victoria. Due to the previous Victorian RFAs taking longer than anticipated the West RFA was not substantially commenced until March with the Public Launch of the Region. Most other RFAs in Australia have taken around 18 months. In July of this year, the Minister for Forests and Conservation Hon. Wilson Tuckey and the Victorian Minster for Conservation and Land Management, Hon. Mrs. Marie Tehan, released a revised Timeline for both Gippsland and West Victoria.

Already the ability to meet these Timelines has been compromised. Under the *Environment Protection (Impact of Proposals) Act 1974,* the minimum period for submission times is 20 working days. With delays to meet the revised schedule by up four to eight weeks, it makes the task of taking submissions up to the closing date and adequately incorporating the submissions into the Directions Report or the final RFA in-plausible. The Gippsland RFA Region does not have a Forest Management Plan. The last sustainable yield review was seven years ago. The Gippsland CRA Report is due out on September 27 1999, with a four week submission period. Submissions made up until the closing date need to be considered in the Directions Report. With even just two weeks to write the Directions Report, it would be released in early November. Allowing for another four weeks submission time and then time to consider theses submissions and write the final RFA will mean that the final RFA would not be available until mid to late December, long after the last sitting day for the Senate of December 9.

The West Victorian RFA had Volume One of the CRA released in August and the region has had the rounds of joint Commonwealth and State CRA public meetings. These where well attended and the questions from the floor where intelligent and well informed. The replies from Department of Natural Resources & Environment Officers was universally judged as flippant, regularly failing to answer questions and vast amounts of additional information that was agreed would be supplied has not been provided.

How can we give our responses to the CRA Report when the all information that we need in order to complete our submissions has not been supplied?

The second Volume of the West CRA Report is due in early October. The Directions Report is also due out at this time. If the proper 20 working day period for submissions is applied the closing date would be early November, leaving one month to write, release, take submissions (4 Weeks) consider the submissions and write the Final RFA and release it and have it pass through the Senate no later than December 9.

CRA Report

The West Comprehensive Regional Assessment Report (Volume 1) has failed to meet the expectations of the West Victorian community. The Report contains inconsistencies in multiplier effects between relative forest and other regional resources and values. Much of the information used is five years old and conveniently pre-dates the closure of CSR's Bacchus Marsh plant with the loss of over two hundred jobs, it fails to show the closure of a number of sawmills, the reduction in the sustainable yield for the Midlands FMA and the closure of the Laminex Plant in Ballarat and a change over to mechanised falling.

On the other side of the equation the use of mid-nineties tourism figures have distorted the enormous rise in tourism in the Midlands and Otway regions over the last four years. The CRA report contains numerical errors.

Much of this report appears to be produced by the Department of Natural Resources and Environment and continues the appalling shallow way that this Department treats its obligations to multiple-value land management.

The CRA Report should be rewritten to a standard that we in the West of Victoria want. The information contained in this report can not and should not be the basis for a twenty-year agreement.

CRA meetings a disgrace -assurances given already broken

The CRA meetings run by the Commonwealth and the State around west Victoria bordered on farce. Universally, people attending these meetings witnessed an arrogant, flippant, dismissive and argumentative response by State representatives. In most instances at the Daylesford meeting, questions from the floor where not properly answered, instead long monologues that were off the point wasted much of the time.

At many of these meetings assurances where given to supply further information. Three to four weeks later (in a shortened process) most of this information has not been delivered.

A commitment by the Commonwealth and the State to supply named References used in the CRA Report has failed. At both the Geelong and Daylesford meetings it was established that due to the compressed timeline, that copies of references would be supplied (as soon as possible). Correspondence from DNRE has just informed the Wombat Forest Society that we can source most of our request through libraries.

We do not have the time to find out which libraries carry the titles, get them in, and borrow them all by the end of September. HOW?

Social Assessment write-ups not a true reflection

The write-ups from the Social Assessments held in the West of Victoria, sent to participants, do not reflect what was said in these meetings. The notes contain information that is inaccurate or not discussed at all, and appear to be written to pre-favor certain outcomes. This is not reflective of an open, honest and accurate process.

Consultation with Local Government

The RFA process is supposed to provide sustainable forest utilisation and management determinations that last for twenty years. A process as long reaching as this would need to be based on a high level of consultation with all allied land management authorities, local government, stakeholders and the community.

In discussions with a number of councilors from six West Victorian Councils and Shires about the RFA process, all have expressed concern about the process and the lack of adequate consultation. In similar conversations with other land management bodies, a general opinion is that the process is quite inadequate.

West Victorian Regional Forest Agreement Region
Submission towards Extending RFA Timeline

What faith will there be in the outcome when it is currently running on such a tight timeline, that important steps in the process, designed to provide consultation, feedback and a sound outcome, are being carried out in tokenistic fashion.

This will undermine the acceptance and possibly accuracy of the RFAs.

Groups questioning whether to remain in the process

The CRA Report falls well short of being a document that proper and necessary analysis and comparisons can be drawn. The CRA contains dated information, numerical inaccuracies, distorted economic multipliers and generalised information that is un-useable.

The community's standard of forest knowledge, depth of understanding and ability to analyse data is at the cutting edge of the contemporary forest debate. The CRA Report needs substantial further information and many of the unsupported assumptions and conclusions contained in the report must be validated.

The growing No Way/RFA campaign by the Save the Forest and Macedon Ranges Conservation Society Groups.

There is significant community unrest and rejection of the whole RFA Process in West Victoria. In the Midlands FMA, there is a very well resourced community uprising against the RFAs. The recent State Elections has seen the State Minister for Health Hon. Rob Knowles loose the safe Liberal seat of Gisborne, the RFA was a major issue in this area. The community's involved represent an educated and economically advantaged community. The RFA process needs extending or a ripple effect may see mass rejection of the process and/or outcomes.

The Otway Region has a growing discontent with the RFAs..

West Victorian RFA

The West Victorian RFA is considerably different from the other Victorian RFA Regions. The West RFA region is made up of vast expanses of mostly cleared private land. The public forested areas are highly fragmented and they have a range of important values- natural, historical and cultural. The West RFA is the most complex region in the State yet it has been left to last with a time schedule that cannot be met.

Catchment Planing Strategy in Progress

Water Authorities have been given a directive by the **Department of Infrastructure** to develop their catchment management strategies. With so many of the forests of Western Victoria being important catchments, it is hard to see how a Regional Forest Agreement can be signed off before this is completed. Directives from these strategies may impact on sustainable yield and harvesting techniques.

Impartiality

The Western Victorian Forest Protection Network and the Tambo Environment Awareness Group question the impartiality of the process. The CRA reports are substantially written by the Department of Natural Resources and Environment , the authority that is charged with implementation of the RFA, they are effectively writing their own job description.

Is the Commonwealth carrying out thorough auditing of NRE supplied data etc.?

West Victorian Regional Forest Agreement Region
Submission towards Extending RFA Timeline

Why during a consultative phase of the RFAs in the west, has a DNRE Senior Forester from the Midlands appeared in the Macedon Ranges Regional News, expressing his feelings towards criticism of forest management in the region?

The CRA submission period is not an appropriate time for this type of article. It questions the ability of DNRE staff to be objective with comments and legitimate criticisms in the RFAs.

To appear with the leading sawmiller also compromises the objectivity of DNRE. It appears that authorisation was given for Mr. Graham to appear/assist in the Timber Industry Promotion.

How can Department of Natural Resources and Environment be seen to be Impartial?

Ecological Vegetation Classes

One of the three most important aims of the RFA is to implement a Comprehensive, Adequate and Representative Reserves System. These will be based on Ecological Vegetation Class mapping that compares pre-1750 EVC cover to current EVC Extant.

At launch of the RFAs earlier this year, Andrew Maclean from DNRE gave a very ambiguous answer to a question about how EVCs will be considered and what defines an EVC region. The West is far larger than all other Victorian RFAs, EVCs should be considered on a sub regional basis to overcome this anomaly . Mr Mc Lean's lengthy response mentioned local, FMA & RFA regions but failed to clearly answer the question. This obviously does not indicate how EVCs will be implemented.

The CRA report states on page 174.

Sub-regional Reservation of Ecological Vegetation Classes

The West region has not been divided into Geographic representation Units because of the highly fragmented nature of the region's remnant forest. Sub-regional representation of EVCs will be considered on a Forest Management Are (FMA) basis.

This statement is too vague. This type of ambiguous determination allows the process to interpreted to favor certain outcomes and is not appropriate during an assessment for the RFAs.

With fragmented remnant forest in a region as large as the West Region, each island of forest is important to its immediate surround. The EVC Reservations should be carried out on an FMA basis as the minimum.

WATER

The most important land management issue for Western Victoria is 'water'. Many of the forested areas in the west are important catchments for both domestic and irrational uses. It is vital that the RFA process incorporates up to date catchment science to ensure full and proper catchment considerations are built into the outcomes.

The West Victorian Comprehensive Regional Assessment report does not provide enough information to enable proper comparisons between catchment and other values. Water Authorities were only consulted

after the release of the CRA Report and found the briefing conducted by DNRE quite dismissive of potential impacts on water from forestry operations. With a process that is meant to be defining forest management for the next twenty years, we believe that it would have been appropriate for the relevant water authorities to have been properly consulted with during the preparation of the CRA report.

Newspapers covering the west of Victoria have contained numerous articles and stories on the scarcity of water in the west, on the need for comprehensive and integrated land management regimes and the move towards a more significant user-pays approach to water.

Clearly the West Victorian RFA Process is not realistically achievable. To pursue the current timeline will render the outcomes worthless, due to a lack of faith in the process from the people who live in and around these forests and who derive both economic and spiritual benefit from them.

We those people, are not prepared to stay in this process if it is rushed. We also vote.

Tim Anderson
Convenor.
Western Victorian Forest Protection Network.
P.O. Box 428 Daylesford. 3460.
Ph/Fax: 03 5348 1748.

...e recognised the voice as of some-...ne he had spoken to on air.

Mr Brady said those conversations ...nvolved the man arguing aggress-...ely about radio ratings and that ..."we were not number one" or that ..."we did not deserve to say we were".

He told Mr Simon Cooper, ...rosecuting, that the caller and the ...ecorded voice had distinctive ...peech patterns and that after years ...n talk back radio he was able to ...ecognise voice characteristics.

Mr Mansfield, 55, said that what ...articularly concerned him was that ...he caller pinpointed his address, ...nd when, on 6 April last year, a ...aller rang the show it "triggered my ...emory" from the tape recording.

Mr Mansfield said he alerted Mr ...rady and Mr Ash Long, his agent, ...ot the caller on line and arranged ...r him to receive a prize so they ...ould check his address to see if he ...as the making the threats.

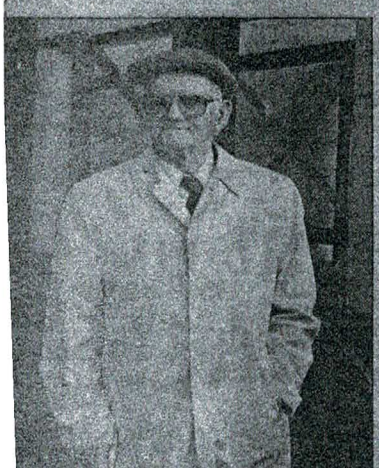
He said the caller's voice reminded ...m of a man who had been "dis-...rbed" about the show's success ...nd who had "more than just a ...assing interest in the program".

An expert speech analyst, Pro-...essor Andrew Butcher, said there ...as a "very high degree of simi-...rity" between a recording of Mr ...ilkins' voice from the radio call and ...e answering machine threat but it ...as not possible to say they were the ...me.

Mr Wilkins told police he found *...ghtline* "a bit nauseating" and that ...e "might have called them ...ckheads" but denied making ...reats.

The charges against Mr Wilkins, of ...merald Street, South Melbourne, ...clude using a phone service to ...enace and four counts of threaten-...g to kill.

The case in continuing.



...cused: Joseph Wilkins, 70.

day.

The girl, Lorna Cubillo, now 61, said one of the men gave her some salted meat. "He held my hand and took me to the water's edge. I was covered in soot and ashes. He washed the lower part of my leg and told the other person that I was a half-caste . . . He picked me up and handed me to the other person . . . My grandmother objected and cried and we rode away."

taken from their families as children and forced to live in institutions.

She told the court the horsemen delivered her to a black car waiting outside the gates of Banka Banka cattle station. She was later moved to a fenced compound at Phillip Creek, where other Aborigines had gathered. Mrs Cubillo's grandmother followed but was not allowed in.

She and other mixed-race girls

on the truck and a "tug-of- broke out between the woman and her Aunt Rose, was breastfeeding an infant. aunt gave her the baby and herself to the ground.

Mrs Cubillo wept as she rec . "a lot of people crying . . . P were hitting themselves hunting sticks and blood pouring down their faces. O truck we were crying."

During the 48-hour journ

Row flares over logging audit

(Age Aug 12, 1999).

A state minister warns her federal counterpart to stay out of Victoria.

By **CLAIRE MILLER**
ENVIRONMENT REPORTER

The State Government has slammed the Federal Forestry and Conservation Minister, Mr Wilson Tuckey, for "interfering" over logging rates in the Wombat State Forest.

The Federal Government has appointed independent auditors to investigate the rates after an analysis indicated timber would be exhausted within 15 years.

The move has infuriated the Conservation Minister, Mrs Marie Tehan, who insists her department's calculations are right and the state does not need "inappropriate interference" from Mr Tuckey.

"Mr Tuckey is barking up the wrong tree," she said. "He should concentrate on problems he has in Western Australia and should allow the formula of due process, which has worked in Victoria for past RFAs (Regional Forests Agreements), to be followed. We do not need inappropriate interference from Mr Tuckey."



Feuding: Marie Tehan is furious with Wilson Tuckey.

But the Victorian Association of Forest Industries welcomed the audit, saying it was in line with a letter from sawmillers and the Wombat Forest Society to Mrs Tehan last year.

The association's executive director, Mr Graeme Gooding, said the industry believed the sustainable yield set by the Department of Natural Resources and Environment should be attainable, "but we are as keen as the (forest) society to ensure the figures are right".

An analysis by the Wombat Forest Society predicted timber in the central Victorian forest would run out within 15 years, putting more than 200 regional jobs at risk.

It said logging rates would need to be halved to restore the balance.

Mr Tuckey said yesterday he agreed to the audit after meeting the society. The audit, which is in addition to routine reviews by the Bureau of Rural Sciences as part of the impending western RFA, will be conducted by two respected forestry academics.

Asked if the audit indicated a lack of confidence in the state's figures, Mr Tuckey said he just wanted to build up as much confidence in the RFA process as possible.

Mr Tuckey also approved an independent audit in Western Australia before its RFA was signed three months ago.

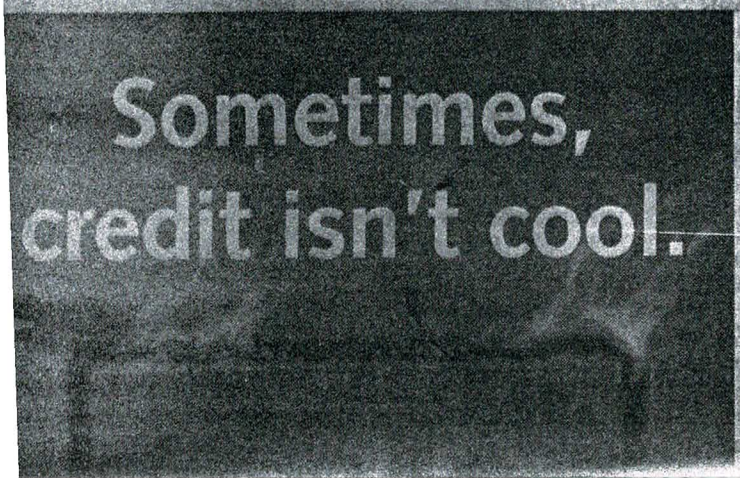
The Wombat audit comes as community tensions mount over the western RFA, which also covers the Otways.

Public consultation periods have been cut short with pressure to complete the agreement by the end of the year to maintain woodchip exports.

Public meetings in Woodend, Trentham and Daylesford over the past month have been packed, with motions passed demanding forests be handed over to community control.

More than 4000 signatures have been collected on petitions.

Much of the Wombat is in the seat of Gisborne, where the Health Minister, Mr Rob Knowles, is attempting to move to the lower house as the anointed deputy premier to replace Alan Stockdale.



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We'll consolidate all your debts into one manageable account. With one low interest rate. And one convenient monthly payment.

You can apply over the phone in a matter of minutes and get

[redacted] Tim - our days work. best A + K

Andrew Stacey & Kim Walland PO box 217 **BLACKWOOD** Victoria 3458 Australia email: astacey@cbl.com.au

August 26th, 1999

The Hon. John Howard
Prime Minister of Australia
Parliament House
Canberra ACT 2600

Dear Sir,

Re: Fast-track RFA Western, Victoria

The Regional Forest Agreement (RFA) is promoted by Government as providing CERTAINTY and establishing a fair PROCESS of Forest Management. Whilst we hope for positive outcomes, the only CERTAINTY emerging is that local communities are left out of the PROCESS.

The Western RFA (Victoria) is being fast-tracked for completion by December 1999. The region includes the Otway and Wombat State Forests. The haste to complete this RFA by December is not in the best interests of the region or the Country.

The 'Comprehensive Regional Assessment' (CRA) component of this Western RFA currently fails to take into account the specific needs of our region, the forest values of all stakeholders, and includes data that is both out of date and incorrect. For example, proposed forest yields in excess of 42 tonnes per hectare are not only unsustainable, they are unachievable. We welcome the independent audit of this data announced (August 12) by the Hon. Wilson Tuckey. Simply put, if unattainable yields are demanded of our forests, we will have no more forest.

You may not be aware that there is widespread suspicion of the RFA; suspicion that the only agreement is to be between Government and a handful of woodchip companies. At a recent public information meeting addressed by an RFA Manager, no dates were provided for Consultation Drafts or any other stage of the PROCESS except the final signoff in December. We are informed that the "fine detail" will be worked out after the agreement is signed.

Evidently this fast-track RFA removes any genuine 'agreement' from 'Regional Forest Agreement'.

We accept that the RFA PROCESS may become a reasonable approach to Forest Asset Management, however in light of the above we ask that you:

> examine the facts for yourself
> bring the RFA methodology closer to some Benchmark of Best Practice
> legislate to extend the RFA period to a more realistic deadline allowing for a genuine Regional Forest Agreement

Yours faithfully,

Andrew Stacey

Kim Walland

cc

Hon. Wilson Tuckey, Forestry and Conservation Minister
Hon. Robert Hill, Minister for the Environment
Hon. Jeff Kennett, Premier of Victoria
Hon. Rob Knowles, Deputy Leader of the Government
Hon. Marie Tehan, Minister for Conservation and Land Management
Hon Dick de Fegely, Member for Ballarat Province
Hon. Barry Traynor, Member for Ballarat East
Hon. Michael Ronaldson, Member for Ballarat
Mr Steve Bracks MP, Leader of State Parliamentary Labour Party
Ms Joanne Duncan, Labour State Candidate for Gisborne
Ms Sheryl Garbutt, Shadow Minister for Environment and Natural Resources
Cr Tom Sullivan, Mayor Moorabool Shire
Mr Chris Gillard, Chief Executive Officer Moorabool Shire
Cr Marg Card, Councillor, Woodlands Riding, Moorabool Shire
Mr Ian Miles, Manager Regional Forest Agreement, DNRE
Mr Neil Mitchell, Journalist, Radio 3AW
Ms Claire Miller, Environment Reporter, The Age
Mr Steven Lunn, Environment Reporter, The Australian
Ms Michelle Poultney, Environment Reporter, Herald Sun

The Hon Wilson Tuckey MP

Minister for Forestry and Conservation
Minister Assisting the Prime Minister

FAXED 16/8/99

Mr Tim Anderson
President
Wombat Forest Society
PO Box 428
DAYLESFORD VIC 3460

16 AUG 1999

Dear Mr Anderson

Thank you for your letter of 24 June 1999 requesting that Professor Brian Turner be engaged to review the sustainable yield methodology in the Midlands Forest Management Area as part of the West Regional Forest Agreement (RFA). The Hon Michael Ronaldson has also written to me in support of your proposal.

I have passed your paper on sustainable yield issues to the Bureau of Rural Sciences to examine as part of the RFA process. I understand that the Victorian Department of Natural Resources and Environment is also undertaking additional work covering the issues raised by the Society.

The basis of the sustainable yield calculations in the Midlands is described in the first volume of the Comprehensive Regional Assessment (CRA) report for the West Region, published on 6 August 1999. As you are aware, Professor Brian Turner of the Australian National University was involved in reviewing the application of the Integrated Forest Planning Systems (IFPS) in the Midlands in 1995 and his work is referenced in the CRA.

A number of other independent reviews of the sustainable yield systems in Victoria have already been undertaken and reported in previous RFA documentation. These have endorsed and accredited the State-wide Forest Resource Inventory (SFRI) system proposed for the West over the next year or two, as well as the IFPS. Given comments by Ms Duclos at our meeting that the Wombat Society had confidence in the results of the SFRI methodology I am sure you will welcome its application in the Midlands.

As part of the RFA process I propose to ask Professor Ian Ferguson and Professor Turner to prepare a report for the joint Commonwealth State RFA Steering Committee on the matters raised in your paper. I anticipate that this work would be reported in the Directions Report for the West RFA, during October 1999. I agree that this advice is an important step towards ensuring that the outcome has the confidence and support of all stakeholders.

The next review of sustainable yield for the Midlands is due in 2001, in accordance with Victorian legislation, and will take into account the outcome of the RFA and any other relevant information, including the work outlined above. I look forward to your continued involvement in the West RFA over the next few months.

Yours sincerely

Wilson Tuckey

Wilson Tuckey MP

Parliament House Canberra ACT 2600 Telephone: (02) 6277 7270 Facsimile: (02) 6273 7096

Western Victorian Forest Protection Network
&
Tambo Environment Awareness Group

Submission for an Extension of the West Victorian and Gippsland Regional Forest Agreement Assessment Periods.

In the interests of proper and acceptable Regional Forest Agreement outcomes for the West Victorian and Gippsland RFAs, the timeline for the process must be extended in both these regions. There is overwhelming discontent with the haste and shallowness of the process in these regions.

If the RFAs are to stand up over time, stakeholder groups, government and semi-government Agencies as well as the broader community must have confidence in the quality of the process that underpins all Regional Forest Agreements.

The community and conservation groups from Gippsland and West Victoria's unsatisfactory experience with the RFA process so far will severely undermine the credibility of a RFA, rushing the process will compound this dissatisfaction.

For the Regional Forest Agreements to achieve their stated goals as well as acting to quench the ongoing 'woodchip hot-potato' on a political level, the RFA processes must satisfy stakeholder and community expectations. The overturning of the West Australian RFA in anticipation of voter recriminations, illustrates that unless the broader community has confidence in the thoroughness and transparency of the process, there will be no resolution to the forest/woodchip issue.

The Hepburn Advocate (September 8 1999) carried an article from the timber industry warning the timber communities of the West of Victoria that they where under threat of going the way of West Australia.

The groups of West Victoria and Gippsland RFA Regions went into the process with an attitude of actively wanting to participate in an impartial and open process, what we have received falls well short of satisfying our faith in the process.

The communities to the East of the Wombat Forest have looked at the other RFAs to date and collectively decided to reject the process completely. Over 8 000 signatures in four weeks supporting the local 'RFA No Way' campaign were collected Meetings and Vigils of over 1 000 people have voted to see the RFA thrown out, there is currently an active working committee of 80 people. Most of these activists are from the respected Kyneton, Woodend, Mt Macedon and Gisbourne areas.

Excellent attendance rates at West Victoria RFA meetings facilitated by both government and community shows the strong public interest in how our forests are managed. Meetings held in Trentham, Woodend, Daylesford, Geelong, Enfield, Portland, Otways and Blackwood all carried a major theme of rejecting the CRA Report Volume 1.

Some of the Main Issues are:

- **Timeline for RFAs Now Unachievable.** The revised timeline for the Gippsland and West Region RFAs, was released by Federal Minister for Forestry and Conservation, Hon. Wilson Tuckey and the State Minster for Conservation and Land Management, Hon. Marie Tehan on July 5 1999. Delays in the release of CRA Reports for both regions and the need to comply with the minimum requirements of the public consultation mean that an RFA by the end of the year is unachievable.

- **The West Victorian CRA Report Needs Significant Reworking.** Inconsistencies, missing data and an overall shallowness in some parts of the Report devalues the first volume of the West CRA. The CRA Report should be rewritten to a standard that we in the West of Victoria want. The information contained in this report can not and should not be the basis for a twenty-year agreement.

- **No documents at all have been released in the Gippsland RFA** and the Tambo FMA planning process has only just started. The complete lack of data and representation in this region seriously limits the community's ability to participate in a meaningful process and does not provide the basis for sound decision making. A twenty year forestry agreement should not be signed until adequate appropriate data is produced and all interested stakeholders are given the opportunity to consider and debate issues.

- **Broad-scale Dissatisfaction with the Haste the RFAs are being Pushed**. The standard of forest knowledge, depth of understanding and ability to analyse forest concepts within the communities involved in the RFA process, is at the cutting edge of the contemporary forest debate. The CRA Reports need substantial further information to be provided many of the assumptions and conclusions contained in the Report are unsupported. It is very hard for participating groups to justify continuing in the process. Many groups have expressed concern over obvious failures in the Process.

- **Impartiality of the Department of Natural Resources and Environment in the RFA Process.** The Western Victorian Forest Protection Network and the Tambo Environment Awareness Group question the impartiality of the process dominated by the State agency. The CRA reports are substantially written by the Department of Natural Resources and Environment, the very same agency that will be charged with the implementation of RFAs. The same agency whose management processes need to be scrutinised by the RFA process to ensure they meet standards.

  During a consultative phase of the RFAs in the west, a DNRE Senior Forester from West Victoria has recently appeared in a local paper alongside the leading sawmiller of the region, expressing his feelings towards criticism of forest management in the region. Is this an appropriate action by DNRE during a submission period following the first volume of the CRA? This compromises the impartiality of DNRE. It questions the ability of DNRE staff to be objective with comments and legitimate criticisms submitted to RFAs.

- **Ecological Vegetation Classes Reservation Criteria Undefined.** One of the three most important aims of the RFA is to implement the Comprehensive, Adequate and Representative Reserves System. These will be based on Ecological Vegetation Class mapping that compares pre-1750 EVC cover to current EVC Extant. The regional determination for the EVC has not been defined. For the EVC criteria to be not set means it is open for manipulation to achieve certain outcomes.

  Sub-regional Reservation of Ecological Vegetation Classes

  The West region has not been divided into Geographic representation Units because of the highly fragmented nature of the region's remnant forest. Sub-regional representation of EVCs will be considered on a Forest Management Area (FMA) basis.

The Regional Forest Agreements FOR Gippsland and West Victoria have every right to an equivalent process to all other RFAs. This is clearly not going to be the case.

In both regions the Commonwealth and the State have a high standard of participation from interest groups and stakeholders. The process needs to be extended to allow all stakeholders and interest groups the time for considered responses during the processes.

With the West Australian RFAs in tatters and NSW and Queensland looking to follow their own equivalents to the RFAs. The Gippsland and West Victorian RFAs will fail to carry any credibility from the community or other management agencies if the process is forced.

The Gippsland and West Victorian RFA need to be extended for at least six months. A failure to extend the RFAs will lead to their eventual downfall.

Western Victorian Forest Protection Network.
Tim Anderson
Convenor.

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