Feb 2000

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Western Victorian Regional Forest Agreements Submission

In response to
West Victorian RFA
Consultation Paper

13 February, 2000

Executive Summary

This submission is for the West Victorian RFA Independent Panel. The submission contains comment specifically regarding issues relative to the Consultation Paper.

The Wombat Forest Society would like to request the opportunity to address the Panel. The WFS believes that between 1 to 2 hours would be sufficient for a full presentation.

This covering section to the Panel contains the Wombat Forest Society's Points that need addressing in the West RFA (The Bottom Line) list. Further clarification can be provided at the panel hearings on some of the aspects contained in this list

The second section deals with some social aspects of the RFA in the region. This section is a summary of over a dozen public meetings held in the region over the last three months. The combined number of people in attendance would have been in excess of 2000 people. The level of public interest in the forests of the region in enormous. Peter O'Mara, Community Liason Officer of both the Wombat Forest Society and the Western Victorian Porest Protection Network has summed up the issues he saw as important form the meetings and the Social Asseement component of the West Victorian Regional Forest Agreement.

Attached to this cover section are a number of papers relative to the current RFA process. The first four papers deal with biodiversity issues. The fifth paper is an analysis of the forest modeling for the Midlands Forest Management Area.

The first four are contained in the WFS submission for the 1995 Forest Management Plan.

(Chapter 6) Flora and Fauna. John Endacott. Local knowledge perspective from someone who has a strong personal and family tie to the Wombat Forest.
(Chapter 7) Fauna. Barry Traill. Renowned authority on fauna. WFS commissioned study into fauna management issues.
(Chapter 8) Indigenous Flora of the Wombat State Forest. Lincoln Kearn. A WFS commissioned study into indigenous flora of the forest.
(Chapter 9) Flora and Fauna Report. Wombat Forest Society Flora and Fauna Committee. Biodiversity issues, including work by Monty Kirby, the living authority on all life in the Wombat Forest.

Attachment 5. Is the Wombat Forest Society 'Critique of the sustainable yield modelling for the Midlands Forest Management Area. This report is a useful paper for perspectives on the non-timber aspects to the forest debate in the region, i.e. Water/catchments, Mineral Springs, Logging History etc.
The report also contains the WFS analysis that has so far predicted the announced reductions.

Wombat Forest Society
Points that need Addressing
For the West RFA
(The Bottom Line)

Non-Timber Resources

Water

An immediate fast-tracking of the processing for the 'Nomination for listing of the Mineral Springs and their Recharge Areas' by the Australian Heritage Commission is needed. This would fulfill previous commitments that the Mineral Spring Listing would be carried out during the RFA process. The Wombat Forest Society does not believe that proper consideration has been given to the possible effect that particular forestry practises may have on the spring's recharge zone. As the Mineral Springs are the most important feature of the region, and underpins the region's economy, the Wombat Forest Society insist that the work to properly identify and protect the recharge areas for the Springs must commence immediately.

The commencement of a full hydrological; study for Western Victoria. This study should investigate all surface and groundwater systems in this part of the State. This study is of greater importance to West Victoria then the Snowy Scheme. Until this study is done and management strategies and principle are developed, we cannot guarantee that land management and utilisation will not be creating negative hydrological effects in the future. Water is the issue, the future and the main limiting factor for the future of Western Victoria.

A full economic comparison between the timber and water values from the Wombat Forest and the Otway Ranges. This should cover a number of 'option' or 'scenario' comparisons based on rotation length and silvicultural technique.

Water, both surface and groundwater, is the main issue for the West of the State for the future. It is imperative that all land use activities are put within their context of potential risks/ impacts on either surface of groundwater supplies.

Small Towns/ Tourism

A 3km buffer around the Blackwood/Barry's Reef area. This would be to preserve the landscape values of these towns. This area survives on the tourism it currently attracts and has the future potential to expand upon. This area is popular for the natural beauty of the Wombat Forest and the Lerderderg River valley, which surrounds the town.

An extension of the Lerderderg State Park to include the Pyrites, already set aside within the consultation paper, and the headwaters of the Lerdederg River, bounded by Coopers & Wild Dog Road to the north, trentham/Greendale Road to the east, Blackwood Ridge Road to the south and Camp Road to the west. This area has high water catchment significance, valuable non-timber interest, biodiversity importance and, what is now, a diminishing forest landscpae beauty. The State Park should be a dedicated reserve. This important area is the last remaining substainal stand of significant trees within the Wombat Forest (50 sq kilometres) and has invaluable tourism potential.

The application of SPZ status to the two coupes that abut the Trentham/Daylesford rail reserve. This strip of bush is the most important future tourism extension asset that Trentham has. To link the current Daylesford /Bullarto tourist rail line through to Trentham, would have a boom effect on the town. Tourists that visit Daylesford would be able to catch a train to Trentham, have lunch, and rail back. Extending the tourism reach of both towns and the hamlets in between.

Assessment of the two coupes with regards to sawlog availability, reveals that there are few sawlogs and that mostly of the trees will go as woodchip. In terms of sheer economics, these coupes will contribute more to the region's future than the proposed logging. If the RFAs are about balance, then these coupes should not be logged, but added into the RFA as Special Protection Zones.

Other Forest Products

That the forests of the West be mapped indicating the annual honey productivity of each part of these forests. This information and the economic value of annual honey production be fully considered in the application of silvicultural methods and full forest planning. A comparison of timber royalty (a once in 80 year rotation return) with honey (80 harvests in an 80 year rotation) must be considered with all forest areas where both timber and honey are produced.

Bio-Diversity Issues

The WFS has commissioned two studies into the area of Bio-diversity. These are attached to this submission. One is by Barry Trail and covers 'fauna' whilst the other is by Lincoln Kearn, and covers 'flora'. These form the basis of the Wombat Forest Society submission in this area.

Also attached is a report by three well-known local naturalists and contains valuable 'local knowledge' perspectives.

Below are some specific comments relevant to a numberof issues raised in the Consultation Paper.

* That a better proportional mix of 'floristic communities' for the 'Herb Rich Foothill' Ecological Vegetation Class be included in the Midlands Forest Management Area.
The proposed SPZs (Special Protection Zones) have a greater proportion of the low rain fall/poorer soil forests protected in comparison to what is indicated on the pre-1750 EVC extent map as the floristic communities that would have been here. A major proportion of this EVC would have covered the volcanic soils/high rainfall areas between Ballarat and Kyneton. More of the Upper Loddon part of this EVC needs to be included, as this would be more representative. This should not be done by removing the areas already covered in the Consultation Paper, but by adding more area. This EVC has only received 30% Protection instead of the 60% identified as necessary to reserve for it status.

* The proposed Lineal Reserves for the Wombat are excessive. The aggregate area has a too high an 'edge to area ratio'. The area covered by SPZs in the Wombat conains nearly half the area being made up by these 'lineal reserves'. For a properly 'Comprehensive, Adequate and Representative' system to be applied, the proportion of the lineal coupes does not satisfy the above criteria. These corridors are important to maintain, but the WFS believes that additions to EVC areas need to be made of 2/3rds the aggregate area from each respective area currently covered by the lineal coupes.

* Placing reserves in areas that are not available to logging makes a mockery of the intent of the RFAs.

* Preservation of all 'wet gullies' and riparian areas within the forests. To ensure that these areas are not dried out by any adjacent logging, the application of an additional

50 meter buffer from the edge of all riparian vegetation or high water or flood mark is imperative.

Timber Industry

* The West Victorian RFA Consultation Paper has announced that the 'Sustainable Sawlog Yield' for the Midlands Forest Management Area needs to be reduced to 40 000-m3 p.a. The Wombat Forest Society predicts a further drop in the Sawlog Yield from the RFA, as a result of the commissioned, independent audit of the modeling for the Midlands.

* The WFS suggests that a step in preserving some of the local timber industry and thereby 'jobs' could be achieved with a new strategy to gain maximum sawlog recovery from all forest operations. The current log grading as practised in the Midlands, is allowing parts of the industry to 'prune' the trees in the bush to down grade sawlogs that the industry really does not want, into residual or pulp wood. There is also a too common practice of cutting 2-3 meters from the base of the big trees in order to make the tree fit the available size of the sawmiller's saws. These sections of tree left behind in the bush have been modeled as sawlog, and should come off the sustainable yield. By ensuring that ever possible part of the felled trees should be recovered as sawlog and processed accordingly. This will help maintain throughput to mills.

* A new strategy for the immediate application of a stand spacing program in forests such as the Enfield and Pyrannes Forests. The aim would be to space the existing trees to allow the maximum potential 'growth release response' to these forest stands, while minimizing impacting of regrowth on water resources. To maximise the spread in forest age classes for bio-diversity purposes. The aim would be to quickly convert these into an interim volume of sawlogs (all be it small) for perhaps 20 to 25 years from now. This would help to balance the sustainable yield for the Midlands Forest Management Area. A discussion with a number of forest scientists recently has confirmed that these trees will respond to being 'released' by adjustments to tree spacing.

* The RFA needs to provide adequate compensation or restructuring packages that allow the industry to restructure to facilitate a full lateral processing/recovery system is needed based on the available resource, not part thereof. RFA FISAP money should have restructuring, retooling and exit scheme money as the main use of available funds. The use of this money for marketing and promotion should reflect the broad output of the timber industry and be a part of an overall strategy.

* A review of the structure and function of the commercial arm of Department of Natural Resources and Environment (Forest Victoria), to audit the activities and actions of this section at meeting the requirements of the Forest Act 1958 and the full and proper implementation of the Timber Industry Strategy, as originally intended by the previous Labor Government in the late 1980's.

* Midway's pending RFA dependent license for woodchips of 80 000 tons should not be enacted. The change of silvicultural approach in the low yielding forests to the strategy suggested in point 2, coupled with the adjustments to log utilisation for best usage, the applications of the CAR Reserves and the downsizing in sustainable yield identified as a part of the WEST RFA process, means that the current license to export woodchips should be sufficient. The case might well be found that almost no residual wood will available for export woodchipping, after the applications of the many layers of intermediate processing of lesser grade parts of felled trees is implemented.

* Any exit packages must be agreeable to the CFMEU and must provide adequate compensation packages to all timber workers, not just mills and contractors.

* A strategy for a reforestation Plan to supplement future wood and fiber production as well as acting as a tool in the fight against salinity. These areas should be aimed at mimicking a natural forest system. It should have the aim of supplying short, medium and long-term timber. These areas should contain an understory and be managed along the principle of restoration forestry and not farming principles. The design and siting of these areas should entail full environmental, hydrological and social impact studies.

* An immediate Action Plan in the development of processing, products and marketing of products made from C and D grade sawlogs. Our forests produce around two-thirds to three-quarters C and D grade sawlogs, yet the whole product focus of the timber industry is based on B grade logs. Research and Development for lateral value adding is needed.

* The WFS believes that a 'Radcon, Radial Sawmill' should be installed at one of the medium size sawmills in the region. This new sawmilling technique is ideally suited to small sawlogs and defects are turned into a feature by the process. The recovery rate per cubic meter of sawlog is around 60% higher than traditional sawmilling. A traditional sawmill recovers around 50% of a log as milled timber, the rest is converted to saw-dust. Radial sawing achieves around 80%.

* That small to medium size sawmills are given equal status and focus within the industry. These smaller mills are better employers on a person per cubic meter of sawlog basis. They also provide employment in smaller towns and hamlets in regional Victoria.

* Utilisers of resources from State Forests must accept that they have an 'environmental, economic and social' responsibility, when they choose to make use of Public Forests.

* A firewood strategy should be developed. This will need a long time frame approach. The firewood market is entrenched in redgum and box/ironbark. These supplies are diminishing and a reasonable change over and buyer acceptance should be allowed for.

* All commitments before, during and downstream of the RFAs must have specific time frame requirements specified.

* That the Wombat Forest/Midlands Forest Management Area should be used as a pilot for the implementation of a 'community or model forestry management' scheme. The manner by which the local timber industry, the workers and the conservationists of the region have been working together for a better future for our forests for the last 8-10 years, places the region in the 'box-seat' for such a trial.

I consider that the above requirements are fully consistent with the principles set out in the Forest Act. 1958, the Timber Industry Strategy and the Regional Forest Agreement requirements for 'Ecologically Sustainable Forest Management'.

Tim Anderson
President
Wombat Forest Society

Community Consultation Concerns
West Victorian Regional Forest Agreement

* Lack of initial Federal/State committment to dialogue opportunities with Wombat Forest Society, Western Victorian Forest Protection Network, Timber Industry, Union and local communities..
ie..one representative (Ian Miles) at only one of three RFA funded Wombat Forest Society information night attended by 500 people

* No community representation on the RFA steering committee

* Initial exclusion of the City of Geelong from the consultative process

* Lack of detailed community consultative strategy and planning especially given our shortened consultation period

* Lack of meeting infrastructure and sosphication such as independant chairperson and adequate detailing of community concerns

* Indequate community coordination/facilitation

* Reluctance by DNRE/Forest Task Force to provide requested reference material and data breakdowns

* Failure to adequately inform important stakeholders of RFA process such as Water Authorities and Local Councils

* Defensive and often evasive responses to community and stakeholder concerns during CRA report meetings

* Lack of feedback from DNRE/Forest Task Force

Peter O'Mara
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