

**Victorian Legislative Council  
Environment and Planning Committee**

**Inquiry Into**

**Ecosystem Decline in Victoria**

Submission by

**Wood Products Victoria Ltd**

**August 2020**



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**28<sup>th</sup> August 2020**

The Committee Manager  
Standing Committee on Environment and Planning  
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Dear Members of the Committee,

Wood Products Victoria Ltd (WPV) welcomes the opportunity to make a submission to the Inquiry into Ecosystem Decline in Victoria.

WPV is the state-based industry organisation that addresses technical-promotional-market related issues and activities on behalf of the wood products supply chain in Victoria, our activities range from the forest to the consumer.

WPV undertakes a wide range of generic technical-promotional-market related activities to protect existing, or to develop new, wood products market opportunities on behalf of the Victorian wood products industry. WPV regularly engages with government agencies, regulators, product representative associations, and building professionals: architects, building designers, engineers, building surveyors and builders on behalf of the wood products supply chain in Victoria.

WPV fully supports the Victorian forestry and wood product industry, which produces sustainable, renewable, certified, local, softwood and hardwood timbers and value-added manufactured products, that collectively through their consumer use play a significant role in assisting to deliver a low carbon future and combating climate change – wood truly is The Ultimate Renewable.

Whilst WPV acknowledges the extensive scope of the investigation of this Inquiry into *Ecosystems Decline in Victoria* across the broad Victorian landscape including,

- marine and coastal environments,
- agricultural lands,
- grasslands, and
- forests,

this submission will in the main restrict itself to just one form of ecosystem – *forests*, which at its core is in fact really a discussion about ‘proper management of one of Australia’s most important, but seemingly not fully appreciated, natural resources.

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## Summary of the Recommendations

A summary of the recommendations presented here are provided below

- R1: What is needed as part of the solution, is a detailed review of the 'lock-up' of public forests in national parks and conservation reserves that prevent or limit management activities, and instead an increase in the active management of native forests across all public land tenures addressing the real major environmental threats to ecosystems and biodiversity posed by bushfires, noxious weeds and plants, and introduced feral animals.
- R2. An independent audit needs to be undertaken of the Governments strategic approach and management of public resources, particularly public native forests, against a true triple bottom line measure including all three pillars: economic, social and environmental (including biodiversity) to assess the competency of these approaches in providing what should be 'expected and balanced outcomes' for the full Victorian community including, urban, rural, and First Peoples.
- R3: Government ecosystem and biodiversity-based improvement management strategies, policies and programs, need to be based on surveys, studies, and research utilising comprehensive cross-tenure investigations of 'all State forests and conservation reserves', to ensure a true and proper representation.
- R4: The Victorian Government needs to recognise and acknowledge the impact of uncontrolled wildfire as the major threat to Victoria forest flora and fauna as well as communities and infrastructure within these areas. In terms of ecosystem and biodiversity protection and renewal it must commit to appropriate programs and expenditure for off-fire season 'preparation' activities (including hazard reduction and road and track fire access maintenance). In terms of hazard reduction burning activities it is recommended that local fire management activities be planned and administered at the community level, and where appropriate should include traditional low intensity burning practices undertaken in cooperation with local indigenous First People communities complementing existing prescribed burning programs but not replacing them.
- R5: The current policy position to phase out timber harvesting in the small remaining areas of production native forests needs to be reviewed and dismissed – 'Environmentally' - ending native forestry will create a negligible benefit to biodiversity, if at all, additionally, it does not guarantee protection of biodiversity, and it is more likely it will lead to a significant reduction in active and accountable forest management across public land; 'Socially' - it negatively impacts on rural communities, businesses and jobs; and 'Economically' - it discards revenues from a local, sustainable, renewable and certified resource and throws consumer hardwood product demand on to imported hardwood products, many with highly questionable environmental credentials.
- R6: Provide proper governance and funding to all responsible agencies and state-owned enterprises (i.e. VicForests), to allow them to deliver their professional duties in managing Victoria's public native forests on behalf of all the Victorian community in accordance with clear regulatory agreements, including those ensuring ecosystem and species protection, restoration and recovery. For production forests also support the Code of Practice for Timber Production 2014 review, that provides the regulatory framework that enables active independently certified management of sustainable timber production within State forests.

## Response to the Inquiry's Term of Reference

The Terms of Reference (ToR) of this Inquiry seeks to investigate, consider and report on *the decline of Victoria's ecosystems and measures to restore habitats and populations of threatened and endangered species* focusing on the following six ToR themes (a) – (f). Considerations and proposed recommendations on these matters are proposed herewith for TOR's (a), (b), (c) and (d).

**ToR (a): The extent of the decline of Victoria's biodiversity and the likely impact on people, particularly First Peoples, and ecosystems, if more is not done to address this, including consideration of climate change impacts.**

There are wide range of factors which collectively contribute in impacting on Victoria's biodiversity and its impacts on ecosystems and people – it is an extraordinarily complex and inter-related arrangement, with no single silver-bullet solution or approach.

In terms of broad ecosystem decline, key drivers include the following.

- **Population growth & urbanisation** – whilst more homes are unquestionably needed to accommodate Victoria's growing population, urbanisation obviously provides one of the most dramatic changes to the previous landform's ecosystems and biodiversity patterns.
- **Agricultural land-use intensification** – also broadly impacts Victoria's rural landscapes and ecosystems with more intensive agricultural practices providing a higher biodiversity change impact, ie transition from broad-acre grazing to intensive cropping.
- **Poor policy coordination** – lack of properly coordinated approaches to overall broadscale and regional land management policies and programs, and regular continuous reactive changes to policy (for forests - driven by green-politics), rather than solid long term committed strategies to holistic triple bottom line principles, work against best-practice environmental outcomes.
- **Habitat fragmentation** – a result of all of the above – urbanisation, agricultural land-use intensification and poorly coordinated forest policy.
- **Increased propensity of 'wildfire'** – Wildfire is the biggest risk to Victoria' native flora and fauna and to overall forest ecosystems. Wildfire is exacerbated due to a lack of both broadacre land management policies and practices, and an ongoing lack of properly resourced off-fire season bushfire 'preparation' activities which serve to assist in mitigating against uncontrollable wildfires (including hazard reduction and road and track fire access maintenance).
- **A proliferation of feral animals** – lack of appropriate management has also resulted in massively increased numbers of feral animals - cats, foxes, rabbits, deer, pigs, goats. Invasive animals provide the next largest risk after fire to Victorian native animals. Australia's 15 million feral cats are reported (at a minimum estimate) to kill as many as 75 million native animals daily<sup>1</sup>.
- **Invasive plants & noxious weeds** – land areas 'locked up and left' unmanaged are quickly overtaken and choked by invasive plants and noxious weeds – recognized as a significant threat to biodiversity - over 1,780 plants are listed as environmental weeds in Victoria<sup>2</sup>.
- **Water extraction** – impacted upon by highly variable climatic conditions combined with inappropriate company water allocations, and sometimes over-extraction.
- **Increasing climate change impacts** – which only serves to multiply the impacts of other key drivers of decline, particularly increased wildfire, and water availability risks.

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<sup>1</sup> Fact check: Are feral cats killing over 20 billion native animals a year <https://www.abc.net.au/news/2014-11-13/greg-hunt-feral-cat-native-animals-fact-check/5858282>

<sup>2</sup> Advisory list of environmental weeds in Victoria [https://www.environment.vic.gov.au/\\_data/assets/pdf\\_file/0028/390970/Advisory-list-environmental-weeds-VIC.pdf](https://www.environment.vic.gov.au/_data/assets/pdf_file/0028/390970/Advisory-list-environmental-weeds-VIC.pdf)

We would like to state at the outset, that WPV has significant concerns about this Inquiry being used as a forum for simply blaming much of Victoria’s biodiversity decline on forest harvesting for wood product production, both native and plantations (a tactic incessantly used by anti-timber industry activist groups with philosophically and commercially driven no-native harvesting policies).

**The reality is that native timber harvesting in Victoria is a highly regulated very small-scale activity that is limited to less than 6% of Victoria’s public native forests. It is not a major cause of ecosystem decline.**

Victoria’s Native Forest Estate

Victoria is blessed with over 7.64 million hectares of native forest - a vast estate which is owned by the Victorian public, and managed on all the community’s behalf, by the Victorian Government through:

- VicForests, who undertake the sale, harvest and regeneration of timber resources from areas of Victoria’s State forests set aside by the Government for wood production, and
- Parks Victoria, who provide management services to the State and its agencies for parks, reserves and other public land.

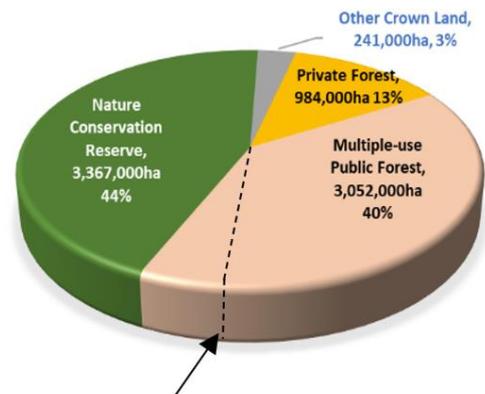
Victoria’s most environmentally important forest areas are protected in the 3.367 million ha of Victorian Nature Conservation Reserve that can never be harvested. All Victorian Old Growth Forest is now protected within the reserve system or excluded from harvesting areas. No Old Growth resource is harvested for timber products.

Around 40% of the forest area is Multiple Use Public Forest (3.052 million ha) that the Government manages for a range of forest values, including wood harvesting for consumer products.

VicForests harvests and regenerates approx. 3,000 hectares per annum of the Multiple-use Public Forests for hardwood timber for consumer products, which is only 0.04% of the 7,645,000ha total Victorian native forest area<sup>3</sup>.

Every area harvested is regrown, by law, to provide sustainable, renewable, local Victorian hardwood timbers in perpetuity - for our use, our kids use, and for all future generations

Victorian hardwood forests managed for timber production are independently certified by the *Responsible Wood Certification Scheme* which is underpinned by two Australian Standards and endorsed by the PEFC, the global sustainable forest management system.



**Only 0.04% harvested annually**  
equivalent to 4 trees in 10,000

*Contrast this to Europe, regarded as the home of sustainable forestry, which has 215 million hectares of forest, of which **80% (150 million ha) is available for wood supply**, according to the State of Europe’s Forests 2015 report*

<sup>3</sup> WPV 2020, Hardwood Products - Native Forestry Facts <http://wpv.org.au/downloadable-resources/>

VicForests, as a responsible harvester of timber, acts in accordance with Victoria’s strict environmental regulations, actively ensuring compliance with the legislative and regulatory framework for the conduct of timber harvesting operations in Victoria. VicForests highly proficient team of professional foresters, and operations and support staff, work diligently to ensure that VicForests meets the highest standards of certified forest management. VicForests’ operations are regulated and monitored by Victoria’s Office of the Conservation Regulator, including through the Victorian Government Forest Audit Program.

Inquiry Concerns

WPV, along with many other organisations, has significant concerns about this Inquiry also being used as a forum for the lobbying for the further expansion of more ‘conservation zones’, or so-called ‘protected areas.’

The old 70’s ‘Conservation movement era’ principles are now being questioned around the world. Whilst the concepts were appropriate at the time in a period of massive global economic expansion at the expense of the environment, the ‘lock it up and leave it’ principles are now quite anachronistic. In Australia, the then landmark 70’s Franklin River legal decision not to allow hydro-electric facilities to be built, or the anti-nuclear protests of the 80’s may be reassessed and viewed differently today as the world strives for cleaner, renewable alternative energy sources.

It is the same with sustainable forestry. In this age of Climate Change mitigation **globally it is today well recognized and understood that a sustainable timber industry, which harvests and then replants trees, storing carbon in forests and wood products is one of the best ways to combat climate change.** The Intergovernmental Panel on Climate Change (IPCC) which advises the UNFCCC on climate matters has stated unequivocally:

↳ *“A sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, **while producing an annual sustained yield of timber, fibre or energy from the forest, will generate the largest sustained mitigation benefit.**”<sup>4</sup>*

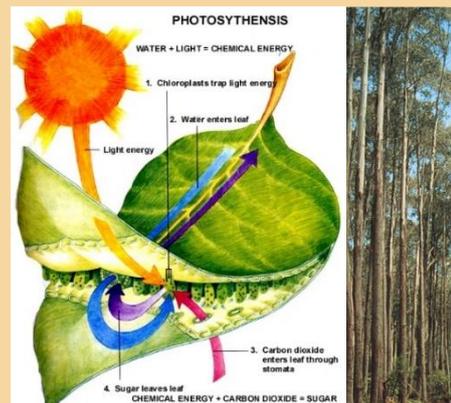
At its core all of these issues should be about proper government strategic planning and appropriate management, and ‘balance’ of all three triple bottom line vales: *social, economic and environmental* – **this is the current globally accepted sustainability principle.**

<sup>4</sup> IPCC 4th Assessment

**Working the Resource  
– the Carbon Benefits**

From an environmental and forest health perspective, actively managing Victoria’s forest estate for sustainable timber production is highly beneficial.

- Through photosynthesis young, actively growing forests absorb high levels of CO<sub>2</sub> storing the carbon in the wood and releasing the oxygen we breathe, by comparison over-mature forests release more carbon dioxide annually than they absorb.



- If the trees are harvested during their growing phase and used in timber products, then the carbon that has been stored remains locked up within the products.
- After harvest, new trees are then regrown allowing the vigorous carbon storage process to continue.

*From a carbon and Greenhouse perspective:*  
**“Grow More Trees – Use More Wood!”**

**R1: What is needed as part of the solution, is a detailed review of the ‘lock-up’ of public forests in national parks and conservation reserves that prevent or limit management activities, and instead an increase in the active management of native forests across all public land tenures addressing the real major environmental threats to ecosystems and biodiversity posed by bushfires, noxious weeds and plants and introduced feral animals. This will require some rethinking of governance structures, land management practices, community and business engagement and the implementation of comprehensive monitoring programs across all public land tenures.**

*ToR (b): The adequacy of the legislative framework protecting Victoria’s environment, including grasslands, forests and the marine and coastal environment, and native species.*

Victorian native forests are a ‘publicly owned resource’ - and the public expectation is that the Victorian Government will competently manage these valuable natural resources, on behalf of the all the Victorian public, for all of their triple bottom line values:

- *economically* (providing a wide range of exquisite hardwood products that consumers demand),
- *socially* (supporting rural workers & communities and metropolitan manufacturers), and
- *environmentally* (protecting against wildfire, improving biodiversity outcomes and ecosystem health, and helping mitigate climate change, particularly in terms of carbon storage opportunities).

**Victorian families want affordable homes and buildings that include hardwood** feature flooring, staircases, cabinetry, joinery, mouldings, windows, doors, linings, durable building claddings, furniture, high strength structural members, decks, screens, fences and landscaping products.

In regard to Victoria’s forests, the distorted focus on simply the ‘environmental’ pillar using the past anachronistic conservation-era precautionary principle approach of ‘lock it up and leave it’, is not the right approach in today’s climate challenged world, and is not giving the broad biodiversity protection needed.

The biodiversity in locked up conservation areas and parks is not being assessed, scientifically understood, or managed as needed – it is simply being left and ignored – whilst at every election more forest is added to the growing one-sided conservation ledger and locked away on a misguided clearly political ‘green-vote’ agenda.

The reality is that Victoria’s public native forests are at significant risk of ecosystem decline - not due to renewable, sustainable, and certified timber harvesting at all - rather due to unnatural fire regimes, increasing introduced plant and feral animal pest threats, diseases, and highly concerning, a lack of committed and properly resourced active management to mitigate these risks.

As global and local climate change impacts increase these risks, it is even more important that active forest management regimes be implemented to ensure that the Victorian Government competently manages these valuable natural resources, on behalf of the all the Victorian public, for all of their triple bottom line values.

**R2: An independent audit needs to be undertaken of the Governments strategic approach and management of public resources, particularly public native forests, against a true triple bottom line measure including all three pillars: economic, social and environmental (including biodiversity) to assess the competency of these approaches in providing what should be ‘expected and balanced outcomes’ for the full Victorian community including, urban, rural, and First Peoples.**

### **Economic & Social Value**

In Victoria, the forest, wood and paper products industry contributed \$7.3 billion to the state economy in 2016-17, directly employed 15,000, and supported an additional 40,000 to 50,000 jobs, many of them in regional and rural areas.<sup>5</sup>

Several reports on the full economic and social value have been published in the last four years that show:

- \$573 million in revenue was generated by VicForests through its contractors (\$76 million) and its direct customers (\$497 million) in the Central Highlands RFA Area in 2013-14. This activity resulted in the direct employment of 2,117 full time equivalent workers within the Central Highlands RFA area.<sup>6</sup>
- The Gross Regional Product of the native forest sector in Central Highlands and Gippsland regions is \$740.5 million annually.
- The gross annual direct expenditure by the Victorian native hardwood sector is \$678 million; the net annual direct expenditure (excluding transfers to other parts of industry) is \$417 million.
- Each job in the Victorian native hardwood sector is estimated to generate a further 1.9 jobs through flow-economic activity.<sup>7</sup>

***ToR (c): The adequacy and effectiveness of government programs and funding protecting and restoring Victoria's ecosystems.***

The effectiveness of government programs and funding to protect and restore Victoria's ecosystems is clearly in question.

From an effectiveness perspective, government policy lacks an overall coordinated broad land management strategic approach, and more importantly long-term commitment to achieving the strategic goals – all which in ecosystem, biodiversity and forestry terms - are highly 'time dependant'.

The biggest issue with current government policy is extremist green-politics, which is not based on independent scientific fact from forest management experts, and which only asserts black & white solutions. Anti-sustainable forestry campaigns are clearly politically driven, the aim being appeasement of activist groups to secure short-term urban electoral votes in marginal seats.

Activist campaigns are also inappropriately 'sold to government' using highly biased, dubious and questionable, often anti-industry group funded and peer-reviewed academic work. Typically, this academic work very unscientifically doesn't focus itself on 'ALL forests', it simply seeks to assert that all forest environmental, ecosystem and biodiversity based issues are caused by native forest harvesting - despite the fact that harvesting is only permitted to occur in 6% of the overall Victorian forest area, and at a meagre 3,000ha/annum out of a total of 7,645,000ha is only a minute 0.04%.

Victoria's native forest industries need certainty, not continuous change in Government policy. The rules need to be set, accepted and maintained, not continuously changed based on simple political whimsy or anti-industry group activist legal warfare.

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<sup>5</sup> [VAFI Industry Review 2017](#), p5

<sup>6</sup> Deloitte Access Economics (2015) *Economic assessment of the native timber industry in the Central Highlands RFA Area Report 1 – Economic and financial impact*

<sup>7</sup> Schirmer J. et al (2018) *Socio-economic impacts of the forest industry Victoria (exc. the Green Triangle)*

The Australian Regional Forest Agreements, RFA's, were introduced in the 1990's a key part of the *National Forest Policy Statement (NFPS)* to bring some long-term certainty to native forest operations. They were negotiated, agreed and accepted, and then signed at both the federal and state government levels by the Prime Minister and the respective State Premiers.

When introduced the process also included extensive consultation to establish agreed baselines for the setting aside of areas of high conservation and biodiversity value. This in turn led to the establishment of the *Comprehensive, Adequate and Representative (CAR) reserve system* to safeguard endangered and vulnerable species and ecosystems. Over 900,000ha of forest was added to the conservation reserves as a result of the Victorian RFA process.

The RFAs are crucial to maintaining a sustainable resource supply and to providing certainty to the forestry and wood products industry, including thousands of urban based downstream manufacturers. Highly concerning and disappointingly, the RFAs have not provided the intended stability of supply and operation over the last decade, as respective State governments have continued to reduce the areas of production forest available, and not committed to a clear, stable and long-term vision for managing Victoria's State forests for their multiple uses, and all of their triple bottom line values.

Much of this government policy flip-flopping stems from the persistent assertions of activist anti-forestry groups, who totally misrepresent to the Government, and the public, the impact of the small amount of RFA controlled and regulated sustainable certified forest production areas, on the overall Victorian environment.

These activist and single-issues based groups take totally credible and broadly supportable ecosystem and biodiversity-based themes, such as endangered flora and fauna protection, and mischievously assert that logging is the cause, their simple mantra - stop logging problem solved.

A major issue here is that the Victorian Government is not investing in 'proper scientific studies that include the whole Victorian forest area' – native conservation reserves (44%), private forest (13%), crown lands (3%), and multiple use forests (40%), when it looks to develop policy supporting ecosystem and biodiversity-based themes, such as endangered flora and fauna protection, for all the forests it is meant to manage on the Victorian community's behalf.

The only significant areas where detailed studies are taking place, is in the small 6% where timber production harvesting is allowed, and often the studies are only focussed on actual timber harvesting coupes and their surrounding area.

Fundamentally, this approach is illogical as under s38 of the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*, forestry operations that are conducted "in accordance with" an RFA are exempt from provisions in the EPBC Act that otherwise control actions that have, or are likely to have, a significant impact on matters of national environmental significance (including listed threatened species).

*The Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) is a federal law enacted to implement Australia's international environmental obligations in the way chosen by the Commonwealth Parliament. As its name suggests, its subject is the protection of the environment and the conservation of biodiversity, and it regulates a wide range of conduct, including activities which may affect what are called in the EPBC Act "matters of national environmental significance".*

A minute 0.04% of Victoria's native forest is utilised per year under the RFA's for timber production with EPBC exemption. Clearly with production there will be disruption. While protections, buffer zones, exclusions and other rules protect biodiversity within harvested areas, no fair, and logically minded, Victorian hardwood timber product consumer would think, or expect, that the 'biodiversity expectation' of an area being harvested, would, or could, be the same as one in a native conservation reserve – this is why the EPBC exemption exists in these small production areas.

Survey and studies of important ecosystem and biodiversity-based themes, such as endangered flora and fauna protection, that determine government policy, need to not just focus on timber harvesting coupes, but be comprehensive cross-tenure reviews of all State forests and conservation reserves, to ensure a true and proper representation of biodiversity based populations and distributions.

The introduction of 'long-term, cross-tenure, and full forest monitoring and research into the conservation status of threatened species is essential and long overdue.

Management strategies, policies and programs will require a true landscape-scale approach to assess the best actions for species populations, including methods for feral predator control. Maintenance and linkage of appropriate habitat across all tenures of public forests will allow land managers to deliver maximum benefit for the highest number of forest-dependent species.

*Protecting Victoria's Environment – Biodiversity 2037*, the Victorian Government's own strategy document, recommends landscape management strategies as the preferred means to biodiversity conservation within Victoria. The strategy states,

*"Threats need to be better managed across the landscape to ensure that species and ecosystems are conserved, and to give biodiversity the best chance to adapt to the effects of climate change and human population growth."*<sup>8</sup>

All humans put a demand on resources, all human activities have impacts, and clearly any human action in a natural landscape has an effect on biodiversity – the challenge and aim is establishing the models of sustainability that 'fairly and realistically balance and optimise production and ecological values'.

**R3: Government ecosystem and biodiversity-based improvement management strategies, policies and programs, need to be based on surveys, studies, and research utilising comprehensive cross-tenure investigations of 'all State forests and conservation reserves', to ensure a true and proper representation.**

#### *Ecosystem and Biodiversity Protection and Bushfire*

#### ***Uncontrolled wildfire is undoubtedly the biggest threat to Victoria's regional flora and fauna!***

Nationally, over Sept 2019 to March 2020, Australia again endured devastating wildfire. The 'Black Summer' bushfires were savage in their intensity, and unprecedented in their national coverage and impact. The fact that over eighteen millions of hectares were burnt, thirty four people perished, more than 5,900 buildings destroyed, an estimated one billion animals killed, over a thousand megatonnes of CO<sub>2</sub> released, and major cities throughout the nation were choked by smoke, served to focus both the Australian public's, and a global audience's attention on the question '*why is this happening*' and '*are we managing our landscape and our forests appropriately*'? The Black Summer fires unfortunately also generated a media storm, and a range of seemingly polarised views around fire prevention and land management; whilst what is really needed is a factual assessment, and non-politicised acknowledgement, of the obvious negative outcomes of current land management practices

In regard to Australian forest management and fire – the key question is what is the true link?

Australia's landscape, including its forests and ecosystems, have evolved over the ages by a natural, ever-changing climate, that includes regular patterns of drought, flood and importantly fire.

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<sup>8</sup> [\*Protecting Victoria's Environment – Biodiversity 2037\*](#), Victorian Department of Environment, Land, Water and Planning 2017, p46

Whilst natural processes have forged the changes over the eons, and Australia's Indigenous people's actions over the last 60,000+ years, it is arguably our own modern population's recent actions over the past decades, both globally from a warming climate change perspective, and locally from our land management practice changes, that have exacerbated and increased the impact of landscape fire, resulting in the uncontrollable 'wildfire' experienced over 2019/20; rather than low intensity bushfires, which normally serve to rejuvenate our native forest areas and the native plants, rather than incinerate them and all the other flora and fauna within them.

Bushfires in Australia are inevitable, and new improved arrangements for 'preparation to mitigate against national natural disaster' are clearly needed. Bushfires and wildfires (uncontrollable bushfires) are a significant climate change, public safety, and public health issue, with huge economic, social and environmental ramifications.

Fire management around the world generally involves three pillars: *preparation*, *response* and *recovery*. In Australia over the past three decades, the funding around fire management appears to have significantly shifted from '*preparation*' activities before the event, to a response to the event through '*fire suppression*' activities with fire management and emergency services professionals. This shifting and weighting of focus, particularly in terms of government funding, appears today to be a highly debated point and major philosophical and political divide.

In terms of suppression, without any doubt, the Black Summer bushfires once again demonstrated the absolute heroics of the frontline firefighters nationally in trying to defend people, property and communities against an almost unstoppable wildfire. During Dec-Feb 2020, all of Australia was fixated on the courage, persistence and skills of the fire community battling this national natural disaster. Their courage and tenacity were unmatched and their skills and decision making unquestionably saved countless lives. Yet unfortunately, because of the unique climatic conditions and the high levels of forest fuel, these uncontrollable wildfires had no chance of being humanly suppressed; and in the end more favourable climatic conditions on the onset of unseasonal levels of rain contained and eliminated the fires.

There is an undeniable lesson from this tragedy, which is not new. It has been raised in almost every previous bushfire investigation, review and Royal Commission, and that is that the most important action in mitigating the impacts of fire is appropriate 'preparation'.

In terms of adequate 'preparation', past land management practices clearly do not appear to have been appropriate. New nationally coordinated and implemented 'whole of landscape' land management practices are desperately needed to prepare against, and help prevent and mitigate against, future national natural bushfire disasters.

Preparation and mitigation are the most critical focus and ongoing 'investment in bushfire prevention', has been shown to be far less costly than the massive costs, in economic, social and environmental terms, of 'response and recovery to significant bushfire events'.

The recent devastating 2019/20 bushfires have clearly demonstrated that 'past preparation' approaches have been lacking, and that new approaches and a broad national collective action is needed; particularly as Australia, and the world, adapts to a globally changing climate.

Some activist anti-timber industry groups, and the academic conservation ecologists they support, purport that timber harvesting from production timber forests increases the likelihood of bushfires and is one the main reason behind native animal extinctions. These assertions, made to mislead the general public, are simply untrue and mischievous. They are strongly argued against by many leading Australian professional ecologists, foresters and forest managers, and the questionable science they

are based on is strongly refuted and rebutted by these experts – refer Attiwill et al (2014)<sup>9</sup>. Also, with only 6% of the forest area available or suitable for harvesting and around 0.04% of forest area harvested per year – asserting that timber harvesting is the primary reason for wildfires and native forest animal extinctions is simply illogical.

A number of submissions to this inquiry from forests experts will flesh out the detail for this Committee on effective forest fuel reduction approaches to assist in preparation and mitigation - for further detail on this topic from WPV we would refer the committee to WPV's submission to the 2020 Royal Commission into National Natural Disaster Arrangements<sup>10</sup>.

**R4: The Victorian Government needs to recognise and acknowledge the impact of uncontrolled wildfire as the major threat to Victoria forest flora and fauna. In terms of ecosystem and biodiversity protection and renewal it must commit to appropriate programs and expenditure for off-fire season 'preparation' activities (including hazard reduction and road and track fire access maintenance). In terms of hazard reduction burning activities it is recommended that local fire management activities be planned and administered at the community level, and where appropriate should include traditional low intensity burning practices undertaken in cooperation with local indigenous First People communities complementing existing prescribed burning programs but not replacing them.**

*ToR (d): Legislative, policy, program, governance and funding solutions to facilitate ecosystem and species protection, restoration and recovery in Victoria, in the context of climate change impacts.*

Proper and adequate legislative, policy, program, governance and funding solutions that address all the triple bottom line values are fundamental to proper and competent governmental management of public resources, including Victoria's vast native forest estate; facilitating ecosystem and species protection, restoration and recovery in Victoria is an important component of this.

The Victorian Government announced in November 2019 of a ten-year phasing-out of timber harvesting from Victorian State forests – using a fair and independent triple bottom line assessment framework, this cannot be seen as good policy.

No Victorian government has ever taken away from its people, a public resource which the people own, utilize widely, and continue to desire and purchase that are manufactured from it.

Victorian consumers want sustainable, renewable certified, locally produced timbers - the Government's own public building policies actually demand this. Victorian families want affordable homes and buildings that include hardwood feature flooring, staircases, cabinetry, joinery, mouldings, windows, doors, linings, durable building claddings, furniture, high strength structural members, decks, screens, fences and landscaping products.

The Victorian Government's *Victorian Forestry Plan* states it will 'assist the industry as it manages its gradual transition away from native logging' – this is incorrect – and it doesn't take the Victorian public into account at all<sup>11</sup>.

- It will not protect Victoria's native forest for future generations – in fact it will cause more intense bushfires.
- It will not impact on 600-year-old, Old Growth – in fact no Old Growth is harvested at present,

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<sup>9</sup> Attiwill, P.M., Ryan, M. F., Burrows, N., Cheney, N.P., McCaw, L., Neyland, M., Read, S., (2014), Timber Harvesting Does Not Increase Fire Risk Severity in Wet Eucalypt Forests of Southern Australia, Conservation Letters, July/Aug 2014 p 341-354, see <https://conbio.onlinelibrary.wiley.com/doi/epdf/10.1111/conl.12062>

<sup>10</sup> WPV, 2020, Royal Commission into National Natural Disaster Arrangements submission by Wood Products Victoria, <http://wpv.org.au/downloadable-resources/>

<sup>11</sup> WPV 2020, The Victorian Forestry Plan – Lies and Mistruths, WPV <http://wpv.org.au/downloadable-resources/>

it's all forest regrowth from past state bushfires.

- It will not protect forest wildlife or threatened species - they are already protected in the 94% of Victoria's forests which are unavailable and/or unsuitable for harvesting.
- It will not provide a transition to plantations, hardwood plantations do not exist in Victoria to substitute for sustainable, native hardwood production forests, and they would take 40-80 years to grow, if you could find the land - the Government's suggestion that transition to plantations is a viable alternative is simply misleading and untrue
- The plan will reduce Victoria's ability to store more carbon and assist to reduce climate change impacts.
- The plan will mean the Andrews Labor Government will look to take away from the Victorian citizens a public resource, which the people own, utilize widely, and which supplies the hardwood timber products that consumers continue to desire and purchase.

Not even considering the economic and social benefits, this policy position should not be supported even on environmental grounds, for the simple and clear reasons that timber production provides a renewable, sustainable, carbon storing low embodied energy in manufacture resource, already very limited in supply (0.04% of forest area harvested per year and all regrown), and highly regulated and independently certified, to protect biological diversity and values – now other alternative product has the life cycle environmental values of timber.

Excluding timber production from native forests will not guarantee the biodiversity and ecosystem protections needed from the key threats of wildfire, invasive pest species, feral animals and climate change. In fact this policy to phase-out timber harvesting in native forests will instead lead to an extremely counter-productive reduction in the active management levels across the whole Victorian forest estate, giving the perverse outcome of in fact compromising protection measures and increasing the risks - and at the same time forcing current Victorian consumer demand on to imported hardwood products from tropical forests with far less governmental or environmental protection or certification; countries such as New Guinea, Burma, Philippines, Malaysia, Borneo, Brazil, Africa, etc.

**R5: The current policy position to phase out timber harvesting in the small remaining areas of production native forests needs to be reviewed and dismissed – 'Environmentally' - ending native forestry will create a negligible benefit to biodiversity, if at all, additionally, it does not guarantee protection of biodiversity, and it is more likely it will lead to a significant reduction in active and accountable forest management across public land; 'Socially' - it negatively impacts on rural communities, businesses and jobs; and 'Economically' - it discards revenues from a local, sustainable, renewable and certified resource and throws consumer hardwood product demand on to imported hardwood products, many with highly questionable environmental credentials.**

Proper governance and funding solutions is obviously critical.

Victoria's public forest estate requires a high level of active forest management to maintain structural diversity and resilience to the range of threats it is exposed to. Supporting the relevant agencies and enterprises that implement forest management practices, in accordance with the existing legislation, government programs and codes of practice is fundamental to long term success. This means support and active management of respective biodiversity and ecosystem outcomes in the total Victorian forest estate – conservation reserves and parks, and multiple use forest.

Native forests and plantations managed for timber production utilise Codes of Practice which incorporate scientifically-based management plans, and enforceable operational standards to ensure that production timber growing and harvesting operations are carried out utilising appropriate

practices that are compatible with the environmental and social values within forests. Further, they promote the ecologically sustainable management of native hardwood production forests, and combined with independent third-party certification, enhance public confidence in forest management. Accordingly, the current recently announced review of the Code of Practice for Timber Production in Victoria is fully supported and the Victorian Government is urged to progress the necessary changes to the Code and to provide certainty to the RFA framework in Victoria.

Victoria's vast forest estate is a public resource, and it is the Victorian Government responsibility to competently manage these, and other, valuable natural resources, on behalf of all the Victorian public, for all their triple bottom line values. Ecosystem decline must be addressed across the whole Victorian landscape, tackling the many impacting factors from changing land-use to invasive noxious plants and animals, but it is one, but not the only, important measure of focus or consideration for the success and growth of Victoria and all its inhabitants.

**R6: Provide proper governance and funding to all responsible agencies and state-owned enterprises (i.e. VicForests), to allow them to deliver their professional duties in managing Victoria's public native forests on behalf of all the Victorian community in accordance with clear regulatory agreements, including those ensuring ecosystem and species protection, restoration and recovery. For production forests also support the Code of Practice for Timber Production 2014 review, that provides the regulatory framework that enables active independently certified management of sustainable timber production within State forests.**

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We trust that the recommendations of this WPV Submission are endorsed by the Inquiry and are appropriately acted upon.

Thank you for the consideration of this submission.

if you have any questions or require any further information regarding this submission please contact Dr Alastair Woodard at [woodard@wpv.org.au](mailto:woodard@wpv.org.au).