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Submission

Owl management review for the East Gippsland Forest Management Area, June 2012

Environment East Gippsland realises there is an overdue need to review owl management but we have grave concerns for our large forest owl populations with this current review. Our owls would further decline as a result of the zone changes and weakening of owl protection as proposed.

We appreciate that there have been additional surveys and detections recently, however this is a minimal component of what's required in relation to the overall picture and information that needs to be used for effective owl management and long term survival.

To ensure that DSE's legal obligations are met, there is more survey work and data that must be gathered, as well as incorporating the most up to date research findings upon which to base proposed plans to rezone protection sites.

Habitat and hectares

Despite new research that shows owls require 3-4,000 ha of suitable mature habitat (this does not include logging regrowth), the proposed rezoning will offer a reduction in even the current inadequate areas of, for example, around 800 ha (Powerful Owls) down to 500 ha. This is about 10-30% of the minimum area they need to survive, let alone recover and thrive. The FFGA states this is the objective of the Act.

To also include multiple owl species inside the one zone as is being proposed, is even further reducing the viability of these small protection zones as an area where we should be able to guarantee their survival.

The short term objective must be to prevent population decline. This cannot be achieved using the proposed zone changes. Owl populations have been declining using current protection measures. They clearly need to have greater areas of prime habitat set aside to ensure their minimal numbers do not further decline.

The Scientific Advisory Committee has stated that owls are '*significantly prone to future threats that are likely to result in extinction'*.

As logging zones cover some of the best unprotected owl habitat that remains, these areas must be included in new protection zones until further research proves that owl numbers are stable at the very least - or increasing, as is the aim of the FFGA.

Plans are to protect nest and roost sites with a 3ha SPZ and a 250-300m radius of an SMZ. We believe there has not been the research to ensure this is effective enough protection for owls. This must be the primary reason for determining zones, rather than simply minimising impacts on logging plans.

Plans to preference existing reserves to 'free up' protected owl habitat outside reserves is less than scientific and effectively reduces their already diminished habitat. Owls do not recognise dotted lines. The ultimate result is that owl habitat is permanently destroyed. Just as extinction is forever, so is the loss of owl habitat once clearfelled.

Both long and short term home ranges for owls are different. The zones being offered appear to be based on short term needs, not year round or even year to year requirements. For example the Powerful Owl needs to shift around through many kilometres of forests that have plentiful hollow trees, healthy understorey, growing on rich soil and supporting arboreal mammals.

The inadequate areas that are planned for their 'protection' must be ground-truthed to ascertain if they are in fact the best habitat. Desk top modelling has been proven to be inaccurate in the past. Regrowth must not be included in their zones as these areas are being, and will be cut on short rotations of 20-50 years. Regrowth provides no to very minimal resources for threatened owls.

We acknowledge that there have been additions to the reserve system recently; however we understand these have not been specifically surveyed for their potential as preferred owl habitat.

During the Brown Mountain Supreme Court expert witness hearings, Australia's top arboreal mammal expert, Dr Andrew Smith, provided this expert witness statement in reply to a statement by Professor Ian Ferguson that glider populations (in this case the preferred prey of Powerful Owls) were catered for:

4. Professor Ferguson's arguments rely on the following assumptions:

1. that hollow bearing trees are the only essential habitat component required by gliders that needs to be ameliorated in timber production forests;
2. that measures proposed to maintain and protect hollow bearing trees (see Table 1 in my Expert Report) are adequate;
3. that measures proposed to maintain and protect hollow bearing trees are actually fully and adequately implemented in practice;
4. that current nature reserves in East Gippsland are adequate in size, structure (oldgrowth), habitat type, disturbance history (not logged or severely burnt), connectivity and other ecological values to sustain viable populations of Yellow-bellied Gliders and Greater Gliders.

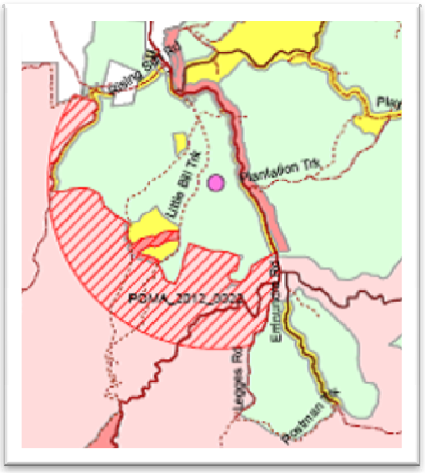
5. Professor Ferguson has not provided any data or evidence to support or justify these assumptions. The evidence available to me indicates that none of these assumptions are supported.

and

in East Gippsland (see Appendix I of the 1995 Forest Management Plan). Not all of these areas are likely to be suitable for gliders for reasons of fire history, vegetation type, connectivity soil nutrient status and other factors. Despite some subsequent increases in the extent of reserved oldgrowth forest in East Gippsland, and the possible location of glider habitat in some areas outside mapped oldgrowth areas, it remains my opinion that there is a high likelihood that the current extent of protected glider habitat in East Gippsland is below that necessary to sustain minimum viable populations over the foreseeable future, particularly in the event of climate change.

11. In my opinion Professor Ferguson's conclusion that current levels of conservation are proportionate to the threats involved does not adequately take account of the ecological uniqueness and importance of the Study Area as a refuge area (from fire and climate change), ecological corridor and high density habitat area for Greater Gliders, Yellow-bellied Gliders and threatened species that depend on them for prey including the Sooty Owl, Powerful Owl and Spotted-tailed Quoll.

This same argument applies to the assumption that by giving owls a zone in a nearby reserve, that their needs will be catered for. There is no evidence for this beleif. There is no research which shows that owl numbers are steady, increasing or declining. There is no evidence that the current reserve system in East Gippsland is even adequate in the long term, especially given the impact of climate extremes and the potential effects on threatened species in the future.



This proposed zone for a Powerful Owl illustrates the absurdity of the zoning system. Some of this area that is inside the circumferance of the circle has been logged, but some hadn't. There has also been both Powerful and Sooty Owls heard in the old growth between Brown Mountain and Brown Mountain Creek. This should have been included, yet only a thin jaggered zone is marked that is not at odds with logging plans.

Obsolete data and information

Previous protection plans from over 10 years ago were based on extremely limited understanding and research - using many assumptions and guesses. They were inadequate then and are totally obsolete now. But the review appears to be adopting this as the information on which to base new owl zones.

New information shows that these large forest owls; the Masked, Sooty and Powerful, require much larger areas. Yet this plan is effectively reducing their territories, delisting current protection zones and ignoring quite a few records that are in high value habitat. This is without any evidence of the owls having stopped using these sites, or any rationale for protecting certain zones (such as at Wombat Creek - now burnt and low value as owl habitat) but ignoring positive owl sites and leaving their shrinking habitat to be forever destroyed as a logging zone and managed for short cycle clearfelling.

The long term objective with any threatened species management is to return their population to a secure status by increasing their numbers and providing necessary habitat. This cannot be achieved by daily clearing of their primary habitat - ie old growth and mature forests. The negative effect of this type of 'owl management' does not require surveys or research to determine. Yet the impacts are being overlooked in the proposed new zoning system. This not only neglects to acknowledge new information, but is also oblivious to the evident.

Changes
There are some areas that are mapped for delisting as owl protection zones which may be less than quality owl habitat, but from ground observation it appear that many other areas would still retain the right mix of site qualities, forest and age class to support owls. Unless these sites have been surveyed adequately to a level which can confidently prove that owls no longer use these areas, these should not be removed. Owl Zones which have records of other values should also remain as protected areas.

Crucial data necessary for effective owl management
What is missing from this plan is basic information on estimated owl numbers, both regionally and state wide.

The 3 million ha of forested owl habitat that was burnt in eastern Victoria in the last decade has never been formally surveyed to determine the numbers that might still exist. East Gippsland cannot be managed in isolation without serious appreciation of this region as the last 'ark' for these endangered species.

These areas are now assumed to be devoid of healthy functioning owl populations and East Gippsland is critical for providing the genetic base for owls to spread back into the rest of Gippsland and the North East in decades to come.

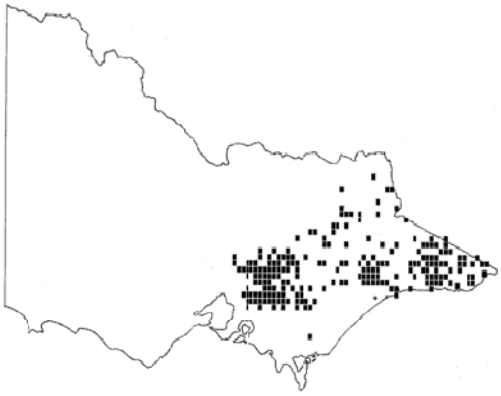
Statewide, the aim is to protect 500 but no surveys have been done to understand how many owls might now survive. It can be safely assumed that since the fires, statewide populations of owls have been halved by the fires. Unless this can be disproved, East Gippsland's plans must incorporate this change to the owls' status with new protection measures.

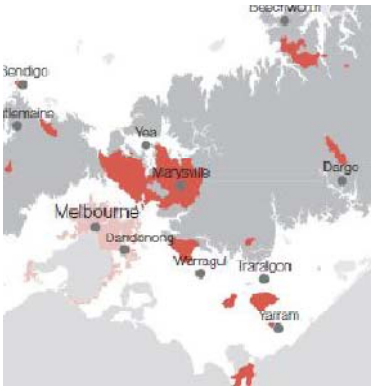
Since the fires, the number of Sooties and Powerfuls across Victoria could be as low as 200-400. In the late 90s it was estimated that there were between 400-900 breeding pairs of Sooty Owls. This was before large swathes of their most densely populated forests were burnt. General scientific agreement is that between 500-1000 breeding pairs are the minimum essential for genetic diversity and survival. The plans proposed cannot in any way ensure this will protect the minimum number for basic survival let alone ensure they can 'flourish'. The proposed new zones must incorporate this fact.

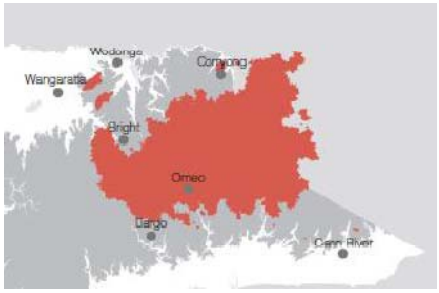
These maps below show the distribution for the Sooty Owl and the fire impacted forests of the '03, '06 and '09 fires.

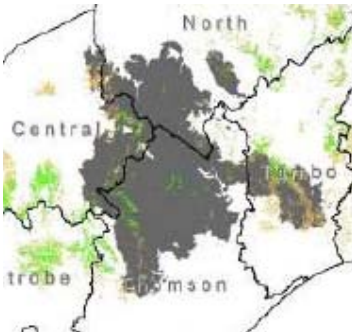
There has clearly been a serious set back for the Sooty Owl's habitat range; meaning East Gippsland is the strong hold and greater protection must be offered here to offset the losses across the state. The increased value of this region's habitat (not just for

owls but all other forest dependent threatened wildlife) must be recognised and plans adjusted accordingly.









FFGA obligations

The government's has been negligent towards its legal obligation to review owl protection through the Action Statements every five years or earlier if new information and research comes to light. The government is planning to approve new owl management in total absence of updated Action Statements for the species.

The Auditor General's report into the FFGA agrees that there is not enough data available to be able to claim any sort of sustainability of species.
Department scientists have also admitted uncertainty about declining owl populations after clearfelling.

RFA

Clause 6 of the RFA states that there will be ESFM developed and implemented. Under Clause 21 Victoria committed itself to achieving ESFM. The examination of Ecologically Sustainable Forest Management resulted in a damning report which was all but ignored when the RFA was signed.

Despite government claims that East Gippsland is the most studied region in Australia, the lack of certainty of the effects of clearfelling was clearly spelled out. Predicting species responses to logging was impossible due to not knowing where species occurred or how they each cope with clearfelling of their habitat. ESFM, it was stated, should *'maintain forest ecosystems and vitality'* and *'protect and maintain biodiversity'* but the RFA was unable to ensure either of these due to lack of scientific data, knowledge and we were told, funds to carry out needed research. There have been no sustainability indicators developed despite this being required.

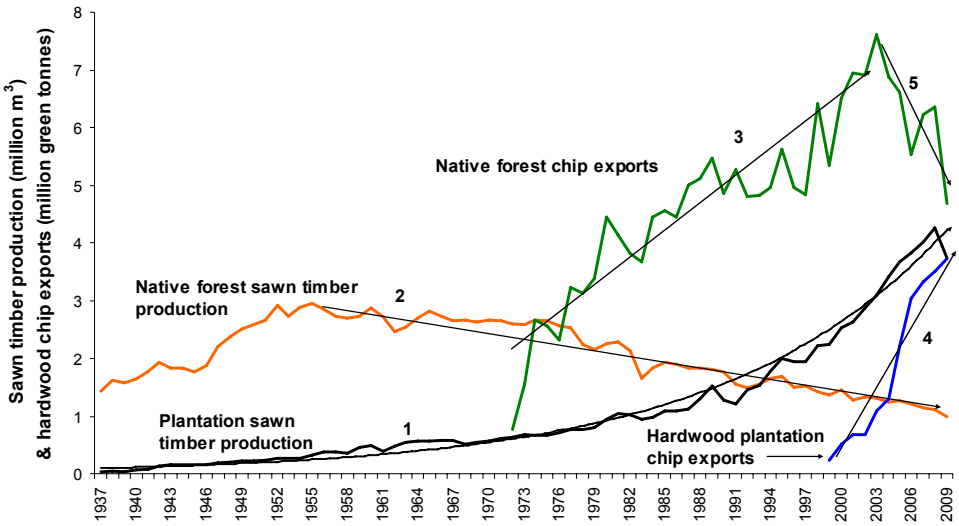
The limited scientific data and knowledge which has been gained since The East Gippsland RFA was signed in1997, is still unable to ensure that owl populations can be maintained let alone increased.

Clause 50 of the RFA states that any changes to the CAR reserve system will not lead to a net loss in the protection of identified values - this would include threatened wildlife. We would hope that DSE has been collaborating with the appropriate people within the EPBC section of the Commonwealth Environment Department regarding these plans to change the CAR reserve system.

The politics of the threatened species protection

Having worked in the area of forest and wildlife conservation for over 30 years, our group is extremely aware of the internal political pressure placed on the DSE to allow more areas of public forests to be made available to VicForests, at the expense of other values, both environmental and social. This is stating the obvious but we feel it needs to be included as a comment.

The demands of industry players and VicForests' customers once drove this pressure, but there is now indisputable evidence that the traditional market for wood products of all classes, is on a serious decline. Markets for sawn timber and woodchips are not expected to pick up.



Prepared using ABARE, Forestry and Timber Bureau and Resource Assessment Commission forestry and wood products industry statistics.

It is tragic that given this trend and the move to plantation products, the Victorian Government is determined to pursue the destruction of these final pockets of protected and unprotected habitat. These forests are being valued for minimal human worth - as a month's work for a few people. In 2012, given the stresses on the world's many ecosystems and species across the globe, the remaining pockets of old growth and mature forests must be valued as a critical insurance policy for entire species. The precautionary principle must be invoked.

Powerful Owl chick. Photo - D Hollands

Conclusion

East Gippsland is by nature a wetter region. It was an ecological refuge for many species during the last glaciation. Despite years of unbridled clearing and conversion of original forests into industrial style regrowth, what remains could still provide the necessary refuge that is needed given the changes we are now experiencing.

The proposed change in owl protection will effectively reduce the owls' ability to maintain populations and will, without question, destroy the potential for owl numbers to increase. When population levels become as low as they are beleived to be now (after a decade of devastating fires and ongoing habitat destruction) they must be given every possibly chance to recover their numbers. This must include every detection site with adequate sized and permanently protected OMAs. If there is any case of threatened species management that deserves having the Precautionary Principle applied, this is the one.

Jill Redwood

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Coordinator