



## Submission to East Gippsland Forest Management Zone Amendments September 2010

EEG has submitted comments on the proposed zone changes in the joint group's submission. EEG would also like to include further comments as follows.

We strongly urge this Government to favour the public's concern for the environment rather than its historic preferential treatment of the demands of a now very small and decreasing logging industry.

This government has a serious image problem regarding the environment. Its continued kowtowing to the demands of a small group that destroys public forests is seen as supporting an unaccountable, unprincipled and increasingly unnecessary industry.

### **Recycling of logging regrowth – suboptimal habitat**

The changes proposed will see a lot of old growth, with its high values for conservation of rare and threatened species, opened up for clearfelling, burning and conversion to industrial wood farms. There are enough biologically poor areas caused by these impacts already in this region to maintain the export chip industry for an eternity. The proposed 'protection' of large areas of regrowth is astounding given the global recognition that such areas are sub-optimal for threatened species, especially more so when areas such as the plum pine mixed rainforests near Goonmirk Rocks are being proposed for logging!

Loss of hollow bearing trees is listed as a threatening process in the FFGA. This part of Victoria's law must be incorporated into these zone changes. *ALL remaining old growth forests must receive full protection.*

It is very simple for the public to grasp that once the government adopts this proposed reserve system of revolving colour schemes on the map, conservation areas will be perpetually recycled back and forth as industry demands logs.

### **The State of our Forests report**

The most recent report shows a out and increase the protection of serious decline in 23 forest dependent species compared to a real improvement for only

4 species. This fact alone is alarming enough to call for serious survey work to be carried out in East Gippsland. This region is the one healthy stronghold for endangered species and where the logging industry is least likely to survive despite millions that have been pumped into it over the years. The conflict between the value of the region for conservation and the demands of the logging lobby will become increasingly highlighted. The report also states that ecological information is poor for the majority of forest dependent species. This MUST be addressed urgently. The RFA documents also made this clear back in 1997. As East Gippsland supports many more endangered species, it is 7-10 times more effective to protect species here than elsewhere.

### **Government conservation dept. works blindfolded**

Such a major change of zones cannot be undertaken with any credibility without decent research, surveys and up to date data. Before previous areas with known values can be 'de-protected' their lack of values must be proven. These areas are being sacrificed at great expense to threatened species for minimal gain for the logging industry. This 'balance' is perpetually weighted in favour of forest destruction. Politically this is a serious loser that can't be remedied by spin and PR firms.

### **Fires and impacts must be incorporated into decisions**

The major impacts of the bushfires over the past decade can be assumed to have made some forest dependent species regionally and functionally extinct where the fires occurred. Now logging and salvage logging is encouraged to destroy what small refuges remained after the fires. East Gippsland is now a stronghold for many species which must be managed to 'survive and flourish in the wild' (FFGA). This is distinct from merely maintaining a genetically isolated population of dubious ability to survive, in numbers so small or unknown they are more like museum pieces than viable populations in a healthy ecosystem. East Gippsland is not immune to bushfires and every pocket of quality habitat *must* be protected, especially the more fire resistant EVCs.

### **SMZs and fire**

There seems to be no logic in why SMZs are now regarded as bands of fire suppression zones when they can and do have clearfelling and flammable thick regrowth throughout. These two uses are in direct conflict. These purposes are even more at odds when we consider the industry preference NOT to have prescribed burns near regrowth or thinnings. It was regrowth forests which burnt the most ferociously in the recent fires. There is also evidence that intact wetter forests were not impacted on as the regrowth areas were (Tara Bulga NP vs regrowth around Marysville).

### **Owls and regrowth**

Large forest owls require huge areas of intact forest with many hollow bearing trees within. Old growth is essential for their survival. Their numbers will continue to decline as areas with similar values as Brown Mountain are converted to wood production crops. Hollow trees left in gullies are a fraction of what is needed to provide the prey species they require.

### **Quolls and protection zones**

Quolls, like owls must be given protection zones across the region (GRUs), rather than in small confined islands such as around the Snowy National Park. These small isolated areas may have minimal conflict with logging demands but are death traps. Past Quoll detection sites MUST remain protected. Research and survey work has to be carried out and further areas be given to their protection across the broader landscape. The demise of the Quoll in Victoria is happening at great speed. This is while governments still favour clearing and burning their known habitat. Both of which are regarded as a threat to their survival. The Brumby government is knowingly presiding over the extinction of this species in Victoria in 2010. This plan is part of it.

### **Sustainability indicators indicate lack of sustainability**

The RFA required that sustainability indicators be identified. Thirteen years on from this state federal government agreement, there are still major gaps in knowledge, data and promised survey work. Altering zones without this information is yet more evidence of this RFA being openly and shamelessly dishonoured by the state government.

### **Brown Mountain as a test case**

The legal case for the protection of Brown Mountain's threatened wildlife proved that DSE does not know (or want to know) what threatened species survive in what forests. With such lack of information, it can only be assumed that political imperatives inform this department's decisions above and beyond the concern for 'sustainability and environment'. There is no lack of funding for surveys, only lack of concern for Victoria's environment and a lack of obligation in adhering to the law.

### **Rare, Vulnerable and Threatened species**

Species in the rare category must also be considered in revising zone changes. The government is obliged under the FFGA to ensure rare and threatened species survive and flourish. This planned revision would ensure the destruction of rare species' habitat and will effectively increase the number of vulnerable and endangered species. This goes against all of the motherhood statements that are constantly pumped out to the public in every publication over the life of the DSE.

### **New protection zones full of logged forests**

The seven zone changes into SPZs around Cabbage Tree Creek/Murrungowar have been up to 90% logged! This provides extremely low habitat value for owls and Potoroos compared to old growth and unlogged forest. The new planned SPZ at 8 ½ mile Track off the Bonang is about 85% logged. Forests west of Combienbar in a planned SPZ has been fully logged. The planned SPZ east of Christians Road is 40% logged. An SPZ planned NW of Mt Jersey is about 85% logged. At Wongarabell that SPZ is about 50% logged. Stoney Peak proposed SPZ nr Mallacoota is 50% logged.

These areas suit the logging industry but few people would accept that these are credible changes that would benefit conservation, especially when old growth zones such as the Mt Plum Pine forests near Goonmirk Rocks are to be wiped out in these zone changes.

### **New logging zones contain valuable old growth forests**

Changes to GMZs and loggable SMZs (from SPZs) show about 6-8 zones have significant old growth or mature forest within them north of Orbost. The forest adjoining Tea Tree Flat is old growth. Significant areas of old growth occur in the patch east of Bonang. At Mt Future near Thurra River, there are old growth stands throughout. The proposed logging zone north of Combiobar has old growth contained within. The 106 ha of wet old growth at Goonmirk Rocks/Sellars Rd area is an outrageous plan to hand this over to clearfelling!!!

### **2006 election promise**

The 41,000 ha of new reserves are primarily forests of minimal value for conservation which has been identified by the industry as of little value to them. The drier forests west of the Snowy, the drier slopes west of Brown Mountain and the many other areas which were existing SPZs or had already been logged, made up the bulk of these additions. The link between Errinundra and the Snowy, the Yalmy forests and the remains of Goolengook were positive additions, but many logical high conservation value areas were omitted. Many of these new reserves are also with minimal connection to other reserved forests and are less ecologically viable as 'islands'.

### **Purpose of assessment of zones**

Included in the reasons for the change of the zoning system is to lock in place more 'resources' for a declining logging industry that has over-logged for decades. An easier solution would be to consider buying out licences and offering permanent exit packages. East Gippsland may be a long way from Melbourne's marginal seats but the value of its forests is legendary across the country. Employment from logging is less than 1% in the region. Employment from nature-based tourism is on a healthy upward rise. The argument for employment in the logging industry has no integrity.

### **Public consultation**

Although Jan Raddick has provided the information necessary for the public to make comments, the given timeline has been absurdly restrictive, the data difficult for many to use, and there has been very little publicity. It has taken well over a year for DSE to redesign the colours on the map yet the public, once armed with all the necessary information, had about 1-2 weeks to comment! This is not in keeping with the government's protocols and principles for public consultation. We must ask – why the rush and limits on consultation?

### **In summary**

This proposal is very poorly thought out, it has no credible data to support the changes, is seen only as a response to industry demands for more quality forests to log, is not based on conservations laws, regulations or principles and if allowed to proceed will destroy many areas of important habitat for the same species which were identified at Brown Mountain. It will also secure a future of even greater conflict in East Gippsland into the future.

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