

Wood Utilisation Plan Submission

for the

**Dandenong Forest Management Area
Logging Years 2004/5-2006/7**

**Prepared by the
Victorian Rainforest Network
29/2/2004**

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1.0 FFG Action Statement

The FFG Action Statement for rainforests represents the most important planning instrument for rainforest conservation and management within the existing policy and legislative framework. After 12 years, the release of the long awaited FFG Action Statement is imminent. This planning instrument is likely to alter the exiting interim minimum rainforest management strategies and zoning boundaries. Logging within RSOS areas *before* this critical planning instrument is released will result in logging operations pre-empting the planning review process.

The release of this action statement will require a review of existing rainforest management guidelines and zoning arrangements. A precautionary approach is warranted when a high degree of scientific uncertainty exists in relation to the effectiveness of existing rainforest conservation strategies. The risks posed by logging operations are proportional to the significance of particular rainforest stands. This entails that the most significant rainforest stands should be afforded greater caution in planning, especially when a major planning instrument is set to refine current guidelines and zone boundaries.

The VRN calls on the Dandenong FMA Manager, senior forester or equivalent, to defer logging in all RSOS to allow for the release, review and implementation of the long awaited FFG Action Statement. This would ensure the DSE is seen to be following due process, and not preempting a revision of the planning rules, now long overdue. Deferring logging in RSOS areas in order to incorporate a new planning instrument (i.e. the FFG Action Statement), would facilitate a more objective, transparent and systematic approach to rainforest conservation than currently exists. The CH FMP allows for:

“this plan allows for the refinement of management guidelines, prescriptions and the zoning scheme in response to new information or changes in government policy, community expectations, technology and timber market conditions” (NRE, 1998: p.75).

Deferring logging operations to permit a reevaluation of strategies currently shrouded by scientific uncertainty, would ensure forest managers comply with the requirement that plans be based on the best available information. Taking a cautious approach, and waiting for the release of the FFG Action Statement will help keep mangers abreast of developments in the area of rainforest conservation and management.

Questions:

- When will the FFG Action be released?
- After over 12 years, why has the FFG Action Statement still not been released?

2.0 Code of Forest Practice

The Code of Forest Practice for Timber Production (CFP) outlines a number of goals, minimum prescriptions and guidelines to protect rainforest values.

Section 2.3.7 of the CFP specifies that:

“The most important rainforest areas should be accorded highest protection” (DNRE, 1996: p. 23). It also sets out minimum buffer widths that the EG FMP is statutorily bound to follow to protect significant areas of rainforest. The relevant sections of the CFP (1996: p.23) are:

s2.3.7(i) for stands of lesser significance- 40m buffers, or 20m exclusion plus a 40m modified harvesting strip.

s2.3.7(ii) 60m min (or 40m+40m mod.) for myrtle dominated rainforest

s2.3.7(iii) For stands containing nationally significant rainforest- the highest degree of protection, generally subcatchment level, except where full protection can be provided by other measures, which are/will be outlined in approved plans.

The 40m minimum rainforest buffers set out by the CH FMP are lower than the 60m (or 40m +40m mod.) minimum required for myrtle-dominated rainforest, by s2.3.7(ii) of the COFP . Section.2 of the COFP stipulates that:

“the goals and guidelines are to be used during the formulation of more detailed plans and prescriptions compiled for application to specific forest areas. These plans and prescriptions must be consistent with the Code and will exceed the minimum requirements outlined in the Code where necessary to protect environmental values” (NRE, 1996: p.13).

The CH FMP rainforest prescriptions are not in accordance with the minimums set out by the COFP s2.3.7(ii). VRN requests that all those coupes containing rainforest be deferred pending independent field inspections, to ensure rainforest buffers are adequately marked. VRN intends to continue undertaking systematic code compliance surveys in the region to support the EPA auditing process.

At present, the EPA does not audit compliance to s.2.3.7(iii) of the CFP. This considerably weakens public confidence in the adequacy of existing rainforest protection strategies and prescriptions. In light of the relatively low level of rainforest compliance in the Central FMA identified by the EPA, it is not unreasonable to request that the department act with openness, transparency and accountability in providing evidence of compliance to the CFP s2.3.7(iii). Unless this is done, the community cannot be assured that the entire rainforest

protection regime is working adequately to protect the full-suite of rainforest values.

The CFP also requires that “rainforest areas must be shown on the Forest Coupe Plan and buffers identified in the field” (DNRE, 1996: p. 24)

Questions:

- What is the minimum buffer applied to myrtle-dominated rainforest? For how long has this buffer been systematically applied?
- How does the DSE measure or quantify “full protection” of nationally significant rainforest stands?
- What kind of monitoring mechanisms are in place to determine the effectiveness of rainforest *planning* strategies, prescriptions and guidelines required by the code? If existent, for how long have these monitoring mechanisms been in use?
- Are training schedules available that record the date, place, trainer, and number of staff attendees involved in rainforest identification training?

3.0 Rainforest Sites of Significance

The Rainforest Sites of Significance (RSOS) objectively and systematically defined by Cameron and subsequently reviewed by Peel, outline the most significant rainforest areas across Victoria. As recommended by (Burgman & Ferguson 1995: 65)

“core areas within RSOS should be the focus of management planning because they represent judgments for the management of risks faced by rainforest, taking into account site topography, proposed management operations, disturbance history and susceptibility of rainforest values to operations”

The Victorian Rainforest Network has identified 37 coupes proposed for logging inside RSOS (**see Appendix 1**). The VRN requests that logging be deferred in these RSOS areas in order to permit an independent rainforest risk assessment and evaluation of current rainforest protection measures and strategies as recommended by Burgman and Ferguson (1995: p. 65).

To facilitate this rainforest risk assessment, the VRN formally requests the release of the rainforest Priority Zone maps and accompanying documentation for each RSOS. Please include the following layers with the Priority Zoning maps:

- Logging history,
- Proposed coupe boundaries
- Topography & streams

- Growth Stage & Relative age (SFRI)
- Eucalypt Species & Stand Height (SFRI)
- Rainforest (Rfor_gbc.shp or similar),
- Management zones (Fmz_f.shp or similar)
- Point localities of rare, threatened and/or endangered flora and fauna taxa (VROTs data-Wildlife Atlas & FIS).

Similar custom maps at 1:25000 scale have already been provided to the VRN by the Central FMA manager and senior forester, and have proven very helpful in resolving important rainforest issues in a professional and non-confrontational manner. We respectfully request similar maps be generated and released for our review and comment to facilitate a more transparent and accountable rainforest management and planning process across the entire FMA. This would be in accordance with several recommendations made by the Burgman & Ferguson report, namely:

- ensure “full documentation of values and reasoning so that the process is transparent, thereby facilitating its use in forest planning and making it available for public scrutiny” (Burgman & Ferguson 1995: 55).
- “publish all maps of core areas and details of their rainforest values, together with rationalizations of protection prescriptions, in Forest Management Area plans where they may be subjected to public scrutiny” (Burgman & Ferguson 1995: p65).
- “implement specific procedures for supervision of compliance and independent monitoring of rainforest protection measures in all Forest Management Areas” (Burgman & Ferguson 1995: p65).

It is imperative that these expert recommendations be implemented to ensure proposed logging operations can be scientifically accredited. The importance of meshing the rainforest planning and management process with scientific best practice was made explicit in the CH RFA. The CH RFA states that a:

“A Technical Report to be completed in 1998, will fully explain the system including a description of Sites of Significance for Rainforest across the State and their level of significance (national, state, Regional) and how they are managed” (COA, 1998: Attachment 1).

The Bill Peel report only partially meets the CH RFA commitments made above, by outlining the levels of significance of each site in an appendix. Regrettably, the Peel report does not provide a detailed description of each site, the core zones each site contains or the management process involved in the design of the SPZs. Despite the Victorian RFA Annual Report of 2000 claiming this RFA milestone has been met and been accepted by the Commonwealth, existing reports and plans do not ensure full compliance with

the CH RFA. Recently, this important issue was raised with the Ministers Office, and a briefing report was requested for their full consideration.

Releasing the requested rainforest planning documents and maps would help the DSE being seen to comply with the Brack's government's policy of open, transparent and accountable governance.

As an interim measure, it is requested that logging be deferred in all RSOS until such maps are released and a reasonable amount of time given to permit a thorough independent analysis of the proposed logging operations. The purpose of this independent review would be to ensure the designated protection measures and strategies take into account the conservation importance of rainforest stands, and the severity and proximity of proposed impacts. Again, this would help ensure the DSE is acting in accordance with the best available scientific advice and recommendations for rainforest protection. Logging within RSOS areas *before* this critical assessment is carried out will result in logging operations pre-empting the necessary FFG review process.

Burgman and Ferguson (1995: 57) also recommended that Rainforest Sites of Significance be fully documented in the FMP. The EG FMP does not fully document rainforest planning processes or outcomes. The VRN requests that such documentation be prepared and/or released as soon as possible to ensure compliance with expert recommendations.

Failing to implement the key recommendations from the Burgman and Ferguson review and/or follow RFA and COFP requirements, places the DSE out of step with scientific best practice and community expectations. The VRN does however concede that past budgetary and political constraints have made it difficult for the DSE to implement key rainforest recommendations. In lieu of this, the VRN is prepared to lobby government to help ensure the resources are found to improve DSE compliance with expert recommendations.

Questions:

- Can the VRN obtain the rainforest RSOS, priority zoning maps and the other layers listed in the above section (preferably in ArcView Shape file format)?
- What are the *landscape* level rainforest protection prescriptions for the CHs region?
- How many coupes in Rainforest Sites of Significance have been logged since the introduction of the CH FMP? (please provide each individual coupe number, area (ha), zoning status, and year logged).
- What documentation supports the SPZ planning process for each RSOS (e.g. summaries of departmental file sources providing input into the rainforest protection plans)?

4.0 Systematic monitoring and research

The CH RFA acknowledges the need for “*continuous improvement*” in the ESFM system in order for it to be considered an accredited sustainable management process. Continuous improvement, in-turn, requires three on going and interconnected processes, namely monitoring, research; and evaluation.

4.1 Monitoring-

Ongoing monitoring of rainforest indicators is the critical foundation from which management and planning outcomes are scientifically benchmarked and accredited. There is an urgent need for the implementation of a systematic long-term monitoring program, as formally recommended by Burgman and Ferguson (1995: p.60). Without such a monitoring program, the ESFM cannot be benchmarked, and thereby qualify as an accredited rainforest management system.

Regular monitoring and evaluations are necessary to ensure the performance and management accountability of forest managers. Clauses 48 and 50 of the CH RFA concur with this position by stating that:

“Parties agree that the current management system could be enhanced by further developing appropriate mechanisms to monitor and review the sustainability of forest management practices.” (COA, 1998; Clause 48)

and,

“Development of indicators, and collection of results for those indicators which can be readily implemented, will be completed in time to enable assessment during the first review of this Agreement” (COA, 1998, Clause 50)

The CH FMP itself acknowledges the importance of ongoing monitoring, research and evaluation in ensuring continuous improvement of planning and management operations, by stating that Regional Managers will:

“develop and progressively implement criteria, indicators and monitoring programs for forest biodiversity, water quality and other environmental values” (NRE 1998: p.77).

The Burgman and Ferguson review placed considerable emphasis on the need to improve rainforest monitoring, research and evaluation standards. Burgman & Ferguson noted that forest managers ought to:

“implement specific procedures for supervision of compliance and independent monitoring of rainforest protection measures in all Forest Management Areas” (Burgman & Ferguson 1995: p65).

4.2 Research

Eleven specific research proposals were put forward, rated by importance (Burgman & Ferguson, 1995: p.xii). These proposals represent the best available expert advice on determining the effectiveness of rainforest protection strategies, prescriptions and guidelines.

Burgman and Ferguson’s key research recommendations sought to address major knowledge gaps in relation to assessing the effectiveness of rainforest management and planning.. The two most highly rated research proposals put forward by Burgman and Ferguson to address the most significant research gaps were:

- “initiate a retrospective study of fire, topography, forest type and harvesting history in relation to rainforest stands” p.68
- “implement survey and monitoring programs for biotic and abiotic edge effects on rainforest” p.72

The implementation of these two recommendations is necessary to ensure a credible, scientifically grounded, rainforest planning and management process. The adoption of a transparent rainforest planning and management processes is essential to scientifically ascertain the effectiveness of existing reserves in protecting Rainforest SOS from probabilistic catastrophic events, such as wildfire.

The CH FMP itself acknowledges the need for research to establish:

“the extent of damage to rainforest and associated buffers as a result of timber harvesting operations” (NRE, 1998: p.77)

and,

“the association between forest management history and Myrtle Wilt status which includes determining the effectiveness of current management prescriptions” (NRE, 1998: p.77)

As explained by Bergman and Ferguson (1995: p.67), “until such data are acquired, it is incumbent on planners to treat rainforest threats cautiously, and to implement protection measures that will cope with the potential for long term and landscape scale impacts”. They go on to note that “rainforest must be afforded the benefit of the doubt in areas where the values are unique or

irreplaceable, and where there is uncertainty about the impacts that may result from management” (Bergman and Ferguson, 1995: p.67). Assuming little or no rainforest research and monitoring activity is currently undertaken by the DSE in the Central Highlands, it is plausible to conclude that considerable risk and uncertainty exists in relation to current rainforest management and planning proposals. Hence a more cautious management regime is warranted which does not preempt the recommendations of planning instruments, nor the results of critical monitoring and research programs.

4.3 Evaluation

An adaptive and scientifically accredited forest management system requires an ongoing quality assurance program. The CH RFA Clause 36 sets out a five yearly review period, permitting an evaluation on the performance and progress of the CH RFA (COA, 1998: Clause 36). This

The CH RFA acknowledges the importance of external evaluation as part of an accredited continuous improvement ESFM system. Clause 44 of the CH RFA states:

“Victoria will further develop the transparency and accountability of its forest management processes through the implementation of an ongoing quality assurance program. The program will be implemented within 3 years, utilizing expertise external to the forest agency in the Department of Natural Resources and Environment or its equivalent” (COA, 1998: Clause 44).

and that,

“Victoria will report on the results of monitoring of sustainability indicators” (COA, 1998: Clause 41)

It is imperative that these clauses and management actions be met and that they specifically address rainforest management issues to ensure public confidence in the overall forest planning and management process. The WUP cannot be drafted in accordance with the FMP, if important actions required by the FMP are not first met. Finally, reviews are an important aspect of management performance evaluation, and ongoing management accreditation and extensive public input must be sought.

Questions:

- The VRN formally asks what rainforest-related research projects, if any, are currently underway?
- How many of the Bergman and Ferguson high-priority rainforest research recommendations have been adopted?

- The VRN formally requests what monitoring and reporting actions are currently being carried out by the DSE in accordance with Clause 48 of the CH RFA and various FMP Management Actions?
- Has the development of sustainability indicators been completed and the results of monitoring been reported in accordance with Clauses 41 and 50 of the CH RFA?
- Has the required 5 yearly RFA review commenced, and public comment been sought?
- What is the methodology for the “ongoing quality assurance program” currently used? How does this quality assurance program assess the effectiveness of rainforest protection strategies?
- Is the quality assurance program open to public scrutiny? If so, how? If not why?
- How can the WUP comply with the FMP, when FMP and RFA requirements are not being effectively implemented?

5.0 Consultation process

VRN would like to take the opportunity to formally note its concerns with the WUP consultation process as a mechanism for public participation in forest planning and management decision-making..

WUP limitations

- a. **Data availability**, - preparation of a thorough WUP submission requires ready access to numerous data sets to permit a GIS desktop analysis of proposed logging operations. At present, much of the spatial data available is not easily accessible to the community, and effectively inhibits the creation of detailed and comprehensive submissions. A ‘level information playing field’ would greatly enhance public participation processes, fostering a more open, transparent and accountable planning and management system.
- b. **Format**, -The WUP should be available in a GIS format to enhance public involvement in the WUP consultation phase and beyond.
- c. **The 28-day deadline**- for statewide groups such as VRN, the 1-month consultation period is grossly inadequate. Due to the sheer number of coupes scheduled across a number of FMAs which contain rainforest values, 1 month does not allow sufficient time to prepare thorough submissions. In lieu of this, VRN reserves the right to raise new information and issues past the WUP submission deadline period.

- d. **Carryover coupes**, - Carryover coupes scheduling in previous WUPs should be listed in the proposed WUPs. This would provide a more accurate picture of planned logging operations and allow for more concrete assessment of proposed logging impacts on rainforest values. Listing carryover coupes would enhance the transparency of the existing WUP process.
- e. **No formal conflict resolution process**- Resolution of planning issues appears to occur in an ad hoc, unsystematic manner, often resulting in public confrontation and conflict. The VRN would like to work with the DSE to help devise a more systematic, transparent and accountable process for resolving WUP planning disputes. A number of models exist nationally and internationally which could be used as a basis for a WUP conflict resolution process.

Questions:

- In detail, how does the senior forester resolve WUP planning disputes?
- How many logging coupes have been removed from proposed WUPs because of public concerns raised via the submission process, since the adoption of the CH FMP?

Appendix 1- Logging Coupes proposed inside RSOS (Dandenong FMA)*

RSOS #	Coupe #	Notes
10	missing	
16	846-511-0001	
20	344-501-0013	Rainforest inside
	344-503-0002	adj spz, rainforest inside
	344-501-0018	
	344-504-0014	adj SPZ, rainforest inside
	344-502-0017	adj SPZ
	344-506-0005	adj SPZ
21	312-011-0006	adj Reserve
22	missing	
23	350-502-0004	
	350-503-0002	
	350-503-0061	
	350-503-0062	
	350-503-0063	
	350-507-0001	adj spz
	350-511-0001	adj spz
	350-502-0002	
	350-502-0004	
	350-506-0001	adj reserve
25	349-305-0005	adj spz
26	347-502-0031	
27	348-507-0030	
	348-50?-0080	
	348-507-0008	
	348-506-0001	adj SPZ, Surrounded by SPZ. Contains Rainforest
	348-510-0005	adj SPZ, Surrounded by SPZ, contains Rainforest, adjacent to Ada Tree Reserve
	348-512-0003	adj SPZ, Adjacent SPZ, adjacent historical site of significance
	348-512-0002	adj res
	348-512-0001	adj SPZ
31	482-502-0000	Road
	487-502-0014	adjSPZ
33	481-501-0022	Cont
	481-501-0021	adj SPZ
	481-?03-0010	part RSOS
	481-501-0007	adj SPZ
34	480-508-0009	part RSOS
	480-508-0008	part RSOS