

Submission to the Major Event Review for Victoria's Fire Impacted Forests



[Kinglake Friends of the Forest Inc](#) is a not-for-profit environment organisation established for people who want to learn about, discuss and advocate for the preservation of the native forests in Kinglake and the Central Highlands. We organise visits to these forests both for day trips and at night when we introduce people, many for the first time, to the excitement of spotlighting for species such as the Greater Glider and the koala.

According to the Victorian government's own figures, 1.3 million hectares or 18% of our forest was burnt in the 2019/20 fires. Much of this was habitat for threatened and endangered species. An estimated 3 billion native animals across Victoria and NSW [were killed or harmed](#). This was an unprecedented and catastrophic event for forest ecosystems and wildlife. Species that were already threatened or endangered as a result of habitat loss, drought, feral predators, fire and logging were driven closer to extinction. How much closer, we don't know because comprehensive surveys have not yet been carried out.

However we do know that 200 flora species have had 50–100% of their range affected by the fires. 154 of these species have been identified by DELWP as of high concern due to fire impacts. DELWP has also identified 67 fauna species of most concern, 20 of which have between 50– 80% of their distribution within the fire footprint.

This makes the protection of surviving forest a matter of urgency. There needs to be an immediate moratorium on logging, at least until comprehensive, well-resourced surveys can be carried out as part of the Major Event Review. The appropriate protections need to be put in place for vulnerable and threatened species before any logging resumes. This is vital in forests known to contain bushfire-affected threatened species such as the Greater Glider (*Petauroides volans*) and the Sooty Owl (*Tyto tenebricosa*) but in view of the paucity of post-fire data, the moratorium really needs to apply throughout Victoria's native forests at least for now.

It is disappointing, and somewhat surprising, that the government should have chosen to make no reductions in existing logging plans since the bushfires. In fact, two additional logging schedules were approved in the 12 months that followed. VicForests is even continuing to log areas where significant populations of bushfire-affected threatened species have recently been recorded, despite many of these species having logging listed as a major threat in their Flora and Fauna Guarantee Act Action Statements.

This continued logging clearly contravenes the precautionary principle in the [Code of Practice for Timber Production 2014](#) which is triggered when "*dealing with threats of serious or irreversible environmental damage*".

It is also contrary to the [recommendation](#) made by leading scientists from the Threatened Species Hub in January 2020 following the bushfires which was to locate and protect key refuge areas which “will be of profound importance for species’ recovery, and hence should be the immediate and ongoing focus for conservation management”. Some of these key refuges have already been logged and others are likely to follow.

Even if careful assessment of animal and plant numbers and ecosystem health were to support the limited resumption of native forest logging, there would still be other factors to consider.

Firstly, there is no longer any serious dispute regarding the effects of climate change and the deleterious effect it is already having on the natural environment, especially with regard to the frequency and severity of bushfires. This means that we need to do all we can to avoid further exacerbating this threat. Scientists specialising in the field report that [logging worsens bushfires](#) and industry attempts to refute this have [ended in disarray](#). Under the circumstances, from a fire danger angle alone, continuing to log native forest may entail unacceptable risk.

Still in relation to climate, Southeast Australia has the most [carbon dense of the world's terrestrial forests](#). Typically, when VicForests logs an area, 60% of the forest carbon biomass is left as waste or "slash" and either burnt or left to rot. The other 40% is removed in the form of logs. The bulk of this is either pulped or used for short term products like pallets. Within 2 or 3 years, this carbon, too, is released into the atmosphere. In a study published by [Keith Lindenmayer et al](#) only 4% of the initial carbon stock in the native forest was converted to sawn timber products with lifetimes of 30–90 years. The same paper refers to a 250 year time span for forest carbon to return to "normal" after logging.

It is worth noting that this same paper states that;

"In contrast to the carbon stock change due to logging, the modelled dynamics of carbon stock change due to wildfire showed gains and losses of less than 20% due to mortality, combustion, decomposition and regeneration .."

This means that, purely from a carbon store point of view, those terrible fires that wrought such destruction and whose smoke plumes spread across the planet released only a fraction of the CO2 per hectare compared with emissions caused by native forest logging. The fires caused a significant hit to our carbon stores. Exacerbating this by continuing to log native forest is unconscionable.

The recent [6th report of the IPCC](#) is a timely reminder of the importance of Victoria's precious native forests' capacity to store carbon if only they are left undisturbed.

In addition to storing carbon, mature, unburnt native forests provide the highest volumes and the best quality run-off for our water catchments. It is conceded in the *Summary Report: information and data to inform public consultation* associated with this consultation process that the 2019/20 fires may have a long-term impact on the provision of water. However, as with carbon stores, the damage caused by wildfire to water catchments is far less significant than the [huge impact](#) we see from logging. Again, when bushfires are known to have damaged our water supply, it seems foolish to allow further and even more serious damage to our water catchments to proceed. There are laws in place designed to minimise the harm done by logging but [these laws are frequently broken](#) so are of little use. The only reliable solution is to stop the native forest logging altogether.

One thing that society has learned from the coronavirus lockdowns is the importance of being able to immerse ourselves in natural environments for the sake of our mental and emotional well-being. The fires distressed even city dwellers as they saw images of the forests they love being incinerated. It is imperative that people are able to reassure themselves that the natural, beautiful forest that didn't burn is still flourishing and can provide balm for their mental distress or [solastalgia](#). The unburnt forest is more precious than ever. On the other hand, for people to go into state forest and see the devastation of logging coupes will only make their solastalgia worse and compound the mental health impacts of the pandemic.

The importance of forests to our well-being is also an economic issue. Tourism is a significant economic driver for Victoria and provides tens of thousands of full- and part-time jobs. As natural forest dwindles, so too will this aspect of tourism. This can be seen in once popular Toolangi. There are still areas of magnificent forest nearby, but an exploratory drive will inevitably confront the tourist with ugly, depressing moonscapes of clearfell. The pub that once provided day-trippers from Melbourne with a meal, is now permanently closed.

Even before these fires made the unburnt forest rarer and more precious, the majority of both urban (70%) and regional (65%) Australians [reportedly](#) already disapproved of native forest logging. These figures were taken from the 2018 Forest & Wood Products Australia report on *Community perceptions of Australia's forest, wood and paper industries: implications for social license to operate*. Similarly, according to DELWP's [Future of our Forests 2019](#), when asked

what people wanted forests managed for, the most popular first choice was “Conserving plants and animals”; the least popular in 11th place was “Providing jobs and economic benefits from timber and wood products”. When asked to respond in their own words to the question ‘How can we protect and improve our forests for all Victorians’, the single most popular comment made by more than half of the respondents was “Protect native forest from timber harvesting.” This would appear to lay to rest any possibility that the native forest logging industry has a social licence to operate.

If we accept all of the foregoing evidence that native forest logging has for some time been inappropriate and unpopular, how much clearer is the situation now that we have lost a further 18% to fire. These fires have had the effect of strengthening every argument against native forest logging.

It is also important to remember that the logging industry operates on unceded Aboriginal land. It is not at all clear that this has the approval of the Traditional Owners. For instance, [Lidia Thorpe MP](#) has said “... you want a Treaty? Then stop logging country!”

Alan Coe (Yorta Yorta) said in this [video](#), “VicForests is going to come in here and rip all the trees down... when the creatures come back there won’t be enough for them, so how can [VicForests] say they’re not going to harm them?”

To summarise, a number of things need to happen in response to these fires.

- An immediate moratorium on logging (including so-called “salvage logging”), at least until this Review and the associated surveys have been completed.
- An immediate transition out of native forest logging (not 2030). This timeframe was too slow even *before* the bushfires. Now the urgency is even greater.
- Updated Conservation Advice Recovery Plans for species both impacted by the fires and threatened by ongoing logging. Where listed species have no Recovery Plan, this needs to be urgently remedied.
- An end to the legal exemption of the logging industry from national environment law.

Once, native forest logging may have been justified. However we live in a changed and changing world and must now do everything in our power to protect regional communities and save species from extinction. All of the effects of bushfire upon our environment are aggravated by logging, and indeed our forests are primed for fire by the continuation of this industry. The government only has limited control over whether our forests burn in bushfires, but it does have the power to do the right thing by stopping the logging.

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