

The Institute of Foresters of Australia

ABN 48 083 197 586



26 November 2008

The Honourable John Brumby
Premier of Victoria
Office of the Premier
1 Treasury Place
MELBOURNE VIC 3000

RE: PUBLIC LAND MANAGEMENT. REVIEW, EVALUATION AND IMPROVEMENT PROCESSES. VEAC RIVER RED GUM CASE STUDY.

For some considerable time the Institute of Foresters Australia (IFA), the peak professional body for forest scientists, forest educators and forested land managers in Australia, has been deeply concerned about the professional standing, cost-effectiveness and equity of processes used for review, evaluation and improvement of forest management on public land in Victoria.

As you are aware, forests on public land in Victoria occupy some 7 million hectares, approximately one quarter of Victoria's land surface. They provide fundamental ecological, economic and social benefits to the people of Victoria and beyond. The sustainability and cost effectiveness of their management is of central concern to Government, the IFA and the people of Victoria, especially forest dependant rural communities.

We are writing to you as Premier, because there is a fundamental need for a logical, balanced and transparent review process that integrates the ecological, economic and social objectives of Public Land Management (PLM), rather than a polarized process dominated by single interest groups. This requires integration of the ministerial portfolios for Environment, Primary Industries and Regional and Rural Development, combined with input from relevant scientific experts and community interest groups.

Our deep concern is that the Victorian Environmental Assessment Council (VEAC) process used in the River Red Gum (RRG) Investigation is unbalanced, biased and does not satisfy their Terms of Reference, the requirements of their Act or the stated objectives in their Discussion Paper of October 2006. Detailed argument in support of our concerns can be found in Attachment 1 which has been prepared as a basis for public debate.

As we see it, the VEAC Investigation is dominated by protective bio-diversity interests to the detriment of proactive ecosystem management for all important ecological, economic and social outcomes. In particular, ecosystem health and vitality, field management systems, the socio-economic values of rural communities and the integration of polarized interest groups in on-ground actions have not been adequately investigated or represented in the development of recommendations.

The dominance of protective bio-diversity interests is clearly demonstrated in the central recommendation that multiple purpose State Forest, currently being managed for bio-diversity and a broad spectrum of other ecological, economic and social



objectives (see Mid-Murray FMA Plan, DNRE 2002), should be reduced from 40% to 4% of public land whilst primary purpose Parks and Reserves are increased from 50% to almost 95% of the available land area (excluding areas set aside for utilities).

A clear and concise description of the objectives, criteria and methods that VEAC has used to arrive at this central recommendation has not been provided in any of their public reports. Transparent debate and definition of objectives and criteria for public land management, along with monitoring of on-ground outcomes, is essential to logical decisions on RRG management.

Public forests belong to all people. As such they must be managed for the whole community within a strong cultural framework for sustainable ecosystem management.

IFA RECOMMENDATIONS

Seek independent, experienced and expert advice on RRG ecosystem condition, ecosystem values (ecological, economic and social) and the cost-effectiveness of on-ground ecosystem management systems so as to complete the VEAC Terms of Reference.

Form a balanced Ministerial Committee to integrate the economic, environmental, social and equity interests involved in Public Land Management as required by Section 18 of the VEAC Act 2001 and the Commissioner for Environmental Sustainability Act 2003. This Committee to advise Cabinet on the completeness, logic and equity of VEAC recommendations prior to final decisions on Public Land Management in RRG forests.

Review and re-develop processes for investigation, evaluation and recommendations on Public Land Management to improve logic, equitability, transparency and on-ground effectiveness.

An opportunity to discuss the above issues and recommendations would be greatly appreciated, preferably on the ground in the forest.

The need for a more logical, balanced and effective process for review, evaluation and continuing improvement of public land management is urgent. We look forward to your response, further discussions and more importantly, collaboration in on-ground action to sustain our RRG forests and their connected communities.

Yours sincerely

Michael Ryan
Chair IFA Victorian Division
0411-285568

cc: Hon. Jacinta Allan
Hon. Joe Helper
Hon. Gavin Jennings

**IFA PUBLIC COMMENT ON
VEAC INVESTIGATION PROCESS FOR REVIEW OF
PUBLIC LAND MANAGEMENT IN RIVER RED GUM FORESTS**

26 November 2008

For some considerable time the Institute of Foresters Australia (IFA), the peak professional body for forest scientists, educators and land managers in Australia, has been deeply concerned about the professional standing, cost-effectiveness and equity of processes used for review, evaluation and improvement of forest management on public land in Victoria.

Forests on public land in Victoria occupy some 7 million hectares, approximately one quarter of Victoria's land surface. They provide fundamental ecological, economic and social benefits to the people of Victoria and beyond. The sustainability and cost effectiveness of their management is of central concern to Government, the IFA and the people of Victoria, especially forest dependant rural communities.

There is a fundamental need for a logical, balanced and transparent review process that integrates the ecological, economic and social objectives of Public Land Management (PLM), rather than a polarized process dominated by single interest groups. This requires integration of the ministerial portfolios for Environment, Primary Industries and Regional and Rural Development, combined with input from relevant scientific experts and community interest groups.

Our deep concern is that the Victorian Environmental Assessment Council (VEAC) process used in the River Red Gum (RRG) Investigation is unbalanced, biased and does not satisfy their Terms of Reference, the requirements of their Act or the stated objectives in their Discussion Paper of October 2006.

As we see it, the VEAC Investigation is dominated by protective bio-diversity interests to the detriment of proactive ecosystem management for all important ecological, economic and social outcomes. In particular, ecosystem health and vitality, field management systems, the socio-economic values of rural communities and the integration of polarized interest groups in on-ground actions have not been adequately investigated or represented in the development of recommendations.

The dominance of protective bio-diversity interests is clearly demonstrated in the central recommendation that multiple purpose State Forest, currently being managed for bio-diversity and a broad spectrum of other ecological, economic and social objectives (see Mid-Murray FMA Plan, DNRE 2002), should be reduced from 40% to 4% of public land whilst primary purpose Parks and Reserves are increased from 50% to almost 95% of the available land area (excluding areas set aside for utilities).

A clear and concise description of the objectives, criteria and methods that VEAC has used to arrive at this recommendation has not been provided in any of their public reports. Transparent debate and definition of objectives and criteria for public land management, along with monitoring of on-ground outcomes, is essential to logical decisions on RRG management.

Public forests belong to all people. As such they must be managed for the whole community within a strong cultural framework for sustainable ecosystem management.

VEAC Terms of Reference

The VEAC inquiry into RRG forests commenced in April 2005 with the following Terms of Reference:

The purposes of the investigation are to:

Identify and evaluate the extent, condition, values, management, resources and uses of riverine red gum forests and associated fauna, wet lands, flood plain ecosystems and vegetation communities; and

Make recommendations relating to the conservation, protection and ecological sustainable use of public land as specified in Section 18 of the Victorian Environmental Assessment Council Act 2001.b

Critical aspects of the VEAC Terms of Reference, including condition, values and management are not adequately covered in the Discussion Paper (DP), Proposals Paper (PP) or Final Report (FR).

Ecosystem condition (essential ecosystem processes)

Detailed information on the current condition of the forest is not provided. Broad scale information is provided on wide-spread tree death, but no detailed information on ecosystem condition in specific RRG forests is included. In particular, soil water movement, soil water storage capacity, ground water levels, ground water re-charge and ground water salinity are not covered. These are currently thought to be the primary reason for the death of many large trees over extensive areas of public land.

Ecological, economic and social values

VEAC reports do not contain a comprehensive, integrated and comparative evaluation of values (as distinct from uses), with the exception of bio-diversity conservation values. This evaluation forms a logical basis for the definition of PLM objectives in RRG forests and the development of alternative strategies for meeting these objectives. For example:

Ecosystem process values

The value of RRG forests to local and regional ecological processes has not been evaluated. For example, energy capture, oxygen production, carbon sequestration, climate amelioration, flood dispersal, soil formation, regeneration cycles, etc...

Rural community connections

The value of the deep personal connections that rural people have with local forests has not been recognised, evaluated or incorporated into recommendations (except for Indigenous people).

Socio-economic values

As we see it, the socio-economic study commissioned by VEAC is based on unsubstantiated predictions of bio-diversity outcomes; unreal money values for bio-diversity (willingness to pay); and unconnected capital values for bio-diversity (e.g. parrots in the forest) compared with net annual income from hard cash primary wealth production activities (e.g. wood) that support a substantial network of secondary and tertiary industries. Where has the socio-economic value of the long line of activities from tree seed to a superb setting of RRG furniture been investigated or evaluated? Without primary wealth generating activities, secondary and tertiary industries, including tourism, wither on the vine.

The socio-economic analysis appears to be based on the underlying assumption that bio-diversity conservation and sustainable wood production are mutually exclusive. That is, one destroys the other. This is not true. In fact, silviculturally based harvesting can be used to enhance bio-diversity (e.g. structural habitat), sustain the forest in the face of reduced flooding (e.g. density reduction) and assist the shift from riverine to dry land eco-systems in the absence of flooding (e.g. species replacement).

This central study requires in-depth evaluation by independent and experienced scientists with expertise in forest ecology, forest economics and rural sociology.

Management systems

The cost effectiveness of existing field management systems for both Parks and State forests is not covered, even though this was raised in many public submissions.

VEAC Acts and Objectives

Section 18 of the VEAC Act 2001 specifies that the number one consideration in carrying out investigations and making recommendations to the Minister is: "*the principles of ecologically sustainable development*" (ESD). This is followed by conservation, protection and other considerations.

Under the *Commissioner for Environmental Sustainability Act 2003*, the objectives of ESD are:

- (a) *"to enhance community wellbeing and welfare....;*
- (b) *to provide equity within and between generations;*
- (c) *to protect biological diversity and maintain essential ecosystem processes..."*

Principles of ESD include:

- (a) *"....decision making processes should....effectively integrate....economic, environmental, social and equity considerations;*
- (b) *the need to develop a strong....economy....for environmental protection;*
- (c) *the need to facilitate community involvement in decisions and actions....."*

The central recommendation that 95% of available public land in RRG forests (excluding utilities) be classified as Parks and Reserves for protective conservation purposes, and

multiple purpose State Forest be reduced from 40% to 4% of public land, is diametrically opposed to the requirements of both Acts for balanced ecological, economic, social and equity outcomes from public land management. In contrast with Parks and Reserves, the stated objectives of State Forest management aim to attain a balance of ecological, economic and social outcomes within a strong regulatory framework for sustainable forest management.

A clear and concise description of the objectives, criteria and methods that VEAC has used to arrive at this central recommendation has not been provided in any of their public reports. Transparent debate and definition of objectives and criteria for public land management, along with monitoring of on-ground outcomes, is essential to logical decisions on RRG management.

In addition, the above recommendation does not meet the stated objectives of VEAC, namely;

Council will recommend a pattern of land use for public lands that will facilitate their sustainable management

Council will develop recommendations that will reflect:

- *A high level of community involvement in the investigation and the ongoing management of public land, including: local residents, indigenous people and groups, commercial and industry interests, conservation and recreation groups*
- *Integration of opportunities for a wide range of uses and activities within the area, including:*
 - *appropriate resource use*
 - *appropriate recreation*
 - *integrated conservation and land management*
 - *accessible and well managed natural areas*

Of particular concern is the fact that VEAC have not addressed the conflict and division between interest groups, especially rural and urban communities. This conflict consumes huge amounts of time and energy and distracts people from the reality that we must work together on the ground in these severely threatened forests if we are to sustain them for future generations, irrespective of whether they are classified as Parks or multiple purpose State Forests.

The alliance of community interest groups that has formed to promote a more balanced approach to PLM in RRG forests (representing some 100,000 people) is strong evidence that the polarized approach of VEAC has not met the balanced requirements of their Act nor their stated objectives of attaining community acceptance and cooperation in PLM.

Further detail on the issues raised above can be found in our submissions to VEAC, none of which led to any effective input or dialogue with members of our Institute b!! the peak professional body for forest scientists, educators and land managers in Australia.

IFA RECOMMENDATIONS

Seek independent, experienced and expert advice on RRG ecosystem condition, ecosystem values (ecological, economic and social) and the cost-effectiveness of

on-ground ecosystem management systems so as to complete the VEAC Terms of Reference.

Form a balanced Ministerial Committee to integrate the *economic, environmental, social and equity* interests involved in Public Land Management as required by Section 18 of the VEAC Act 2001 and the Commissioner for Environmental Sustainability Act 2003. This Committee to advise Cabinet on the completeness, logic and equity of VEAC recommendations prior to final decisions on Public Land Management in RRG forests.

Review and re-develop processes for investigation, evaluation and recommendations on Public Land Management to improve logic, equitability, transparency and on-ground effectiveness.

We look forward to open, honest debate and decisions on the issues raised above. More importantly, to a collaborative effort to build on the work of VEAC and initiate cooperative action to sustain our RRG forests and their connected communities (rural and urban!). Your proactive participation is invited.