

The Institute of Foresters of Australia

ABN 48 083 197 586



The Institute of Foresters Australia (IFA) is pleased to tender this submission to the Goolengook Forest Investigation.

Firstly we would like to congratulate VEAC on the quality of the information booklet that was released as part of the investigation. It was clear, precise and laid out all of the facts for those wishing to prepare submissions. The debate on forestry, forest management and land use determinations is often shrouded in half science, mistruths and scaremongering.

The history of the Goolengook block is interesting and worth noting. It has been overlooked for entire inclusion in a National Park 3 times. Active management of the State forest for timber production has been approved 5 times by State and Federal governments. The community is now getting a further say in the land status and the future management of this forest.

The IFA has a series of policies for the management of forests and plantations that are developed from the best science available on each topic. Our policy on Forest Management Planning advocates planning to provide a diverse range of values and sustainable resource use on all forest tenures. We believe that stakeholder input is required in a successful plan and plans should be integrated and holistic. We believe that the Regional Forest Agreement (RFA) for East Gippsland constitutes a proper plan for the future and the sustainable use of these forests. It was conducted at the right scale, considered bio-geographic regions within the plan extent, established a Comprehensive, Adequate and Representative (CAR) reserve system and involved extensive stakeholder engagement. The RFA is supported by the East Gippsland Forest Management Plan, which has provided for adaptive management for those values that are changing and prescriptions to ensure that where harvesting is allowed it is done to the world's best practice to protect those values that are not incompatible with limited harvesting.

The other relevant IFA policy is on Rainforest. The IFA supports the protection of all rainforest in the Goolengook block in formal and informal reserves with adequate buffers. The management of rainforest is unaffected by the results of this investigation.

The IFA believes that the current management of the Goolengook block meets our standards as a demonstration of sustainable forest management.

This current management regime has demonstrated to be adaptive with two additional reserves being created when threatened values were identified. In this current investigation no new values have been identified.

Questions Asked by VEAC

- Should all or part of the Goolengook Forest Block be added to the Errinundra National Park and why?

No. The RFA and the East Gippsland Forest Management Plan have adequately protected all of the biological diversity values. The current management regime has demonstrated adaptive management and allows for conservation and productive use to occur from within the block. These were regional assessments that considered the distribution of conservation measures across bio-geographical units. The targets for the conservation measures were independently set by the JANIS Committee and were achieved in full or exceeded in East Gippsland. These targets included protection measures for old-growth forest. The IFA believes this constitutes world's best practice and once off assessments of a small part of the total forest estate undermines the regional assessments and results in a referendum style land use decision.

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- If only part of Goolengook should be added to the Errinundra National Park, which parts and why?

If the community insists that more National Park needs to be created then the Goolengook Flora and Fauna Reserve could be added to the park. This would protect the integrity of the Forest Management Plan and the RFA and ensure best practice management could continue on the State forest.

- If all or part of Goolengook is added to the Errinundra National Park, where are there alternative areas or alternative harvesting practices that could be utilised to ensure no net deterioration of timber production capacity?

Sustainability is also about accountability. It is no longer acceptable to just shift the impacts of natural resource usage to other locations. Without an indigenous native forest industry we will shift all of our impacts to forests in other countries. Without some harvesting in the Goolengook forest we are just shifting our impacts into other forests.

There may be alternatives available but the complete data sets required to make such judgements are not available to the public.

An important consideration will be the cost of the alternatives and who shall bear these costs. If the community wants more National Parks then the community must pay all of the associated costs. The timber industry should not bear the costs. If any alternative increases harvesting costs these will be borne by VicForests. They now operate under an open and transparent market system which sets the mill-door price. The increased harvesting costs will come from their margin. They can absorb these costs and make lower returns for the Treasurer or they will try to pass them onto their customers. These costs affect Victorian timber's ability to compete in the market place, allowing market share to go to alternative less environmentally friendly materials or to timber from less sustainable sources. These are both lose lose outcomes for global sustainability.

- Are there additional ecological values that have not been published or not are widely known? If so, what are they?

The IFA is not aware of any new values that need to be considered in a land use determination for the Goolengook block. The IFA will be disappointed if any one in the community has new information and has not made it available to the Department of Sustainability and Environment (DSE) prior to this investigation. DSE has clearly demonstrated its commitment to and performance on adaptive management. Any new value that is present would have been protected immediately and incorporated into the planning regime. Anyone who has held back information has jeopardised the protection of that value to influence the outcomes of this investigation. VEAC should share the IFA's suspicions on any new values that are exposed by this investigation.

- What are the recreational activities or other uses currently undertaken in the Goolengook forest management block? How might these activities or uses be affected by a decision to add all or part of Goolengook to the Errinundra National Park? To what extent would they be affected?

State forest offers a broader range of recreational pursuits than National Park. However the Goolengook block is isolated and the timber roads provide the only access. The only people who visit the area in moderate numbers are the local foresters, the timber industry and anti-logging activists.

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- Would there be any social impacts or benefits if all or part of Goolengook was added to Errinundra National Park (assuming on net deterioration of timber production capacity is achieved)? If so what would they be?

This investigation on whether to add the Goolengook block to the Errinundra National Park will have no social impact to the East Gippsland community, provided that the timber industry is not affected by higher costs or reduced resource. The additional National Park will not increase tourism numbers as it is isolated from major tourist routes. The Snowy and Errinundra National Parks already contain the iconic features likely to attract visitors.

Summary

The IFA believes that results of the Goolengook Forest Block Investigation are unlikely to increase the sustainability of the forests and the timber industry. The investigation is about shifting the impacts from one forest area to another. It is unfortunate that the world's best forest practices applying to the Goolengook block are not recognised as such. The Victorian Government's Forest Sustainability Charter recognises this. The Our Environment Policy recognises this and will commence a project to get independent third party certification of this fact.

The IFA implores VEAC to recognise that the current management is as close to world's best practice as is possible and to explain this to the community in general and to those who respond to the investigation.

VEAC has the opportunity with this investigation:

- to acknowledge the role of regional assessments and their superiority over local assessments to protect forest values,
- to acknowledge the accountability required under sustainable land use practices to not just shift impacts, and
- to ensure that active management for the production of native hardwood timber from the Goolengook forest is allowed to continue.

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