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**Comment on the Victorian Government's draft Directions Paper
"Delivering Sustainable Forest Management"**

Thank you for the opportunity to provide a response to the Victorian Government's draft Directions Paper: *Delivering Sustainable Forest Management*.

Friends of the Earth Melbourne notes that the draft Directions Paper is primarily concerned with the commercial sustainability of industrial logging. At face value does not have any substantial positive implications for ecological sustainability. We have made some preliminary comments on the Directions Paper (below) and look forward to providing a detailed response when the final Directions Paper is released for public comment.

Friends of the Earth Melbourne has two general areas of concern in response to the Directions Paper:

- the lack of public consultation surrounding the Government's decision to establish VicForests under the model outlined in the Directions Paper without providing alternative models for community consideration; and
- the need for policy and regulatory specifications, particularly as they relate to ecological sustainability, to form a second Directions Paper.

Please find our suggested changes to the Directions Paper attached, which have been included as track changes to the original Paper. The amended Directions Paper was developed by Lawyers for Forests and Environment Victoria, with input from Friends of the Earth Melbourne (FoE) as well as the Australian Conservation Foundation and The Wilderness Society. The amendments do not reflect FoE's response to each specific issue raised within the paper, but generally seek to make the Directions Paper focus on options for reform as opposed to presenting a final policy decision and seeking public comment on the implementation of this policy.

VICFORESTS AND THE THREAT OF PRIVATISATION

Our concerns in relation to the establishment of VicForests as a State Owned Enterprise accountable to the Minister for Agriculture and to Treasury, is that the preferred model of the Government appears to follow a similar model to that adopted when the Victorian Plantations Corporation



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(VPC) was formed in 1993. The legislated establishment of the VPC positioned the corporation for privatization; and in 1997 the Kennett Government sold the right to log the plantations to a private company under a 99-year lease.

POLICY & REGULATION

Aside from some broad commitments to developing 'sustainability indicators' and reiterating the commitment to instruments such as the Code of Forest Practices, policy and regulation issues as well as many other functions of the Department of Sustainability and Environment in relation to forest management, have not been addressed in the Directions Paper. The omission of such detail makes the Paper confusing, in that the roles of the DSE and VicForests are not clear.

Friends of the Earth Melbourne is concerned that the Government's understanding of the term 'sustainability' as reflected in the draft Directions Paper generally appears to be 'sustainability of timber resource' for the timber industry and not ecological or social sustainability. The concepts of both ecological and social sustainability need to be developed by the community and reflected in Government policy. These issues must be tackled in parallel with commercial accountability and commercial efficiency issues.

Whilst the Montreal Indicators might be a good place to begin with developing 'sustainability indicators' for ecological sustainability, 'minimum performance criteria' should be developed which specify the type and level of action required to implement the indicators, based on the independent advice of scientific experts. Concepts of social sustainability should be established through a public consultation process, however the ability of forest managers to fulfill the community's expectations depend on the establishment of a diversity of mechanisms for ongoing community participation in forest management.

The following initiatives are recommended as part of the development of the DSE's forest policy and regulatory framework:

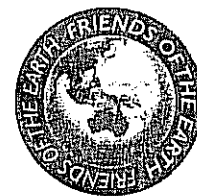
- development of minimum performance criteria for ecological sustainability in addition to the broad 'indicators' outlined in the Montreal Framework
- protection of all old growth forest and high conservation value forest
- re-instatement of ecological surveys in all Forest Management Blocks prior to finalisation of logging plans
- strengthening environmental legislation such as the *Flora and Fauna Guarantee Act* (1988)
- strengthening current instruments such as the Code of Forest Practices
- a public review of silvicultural practices in all forest areas to ensure they are ecologically sustainable, in accordance with the 2002 ALP election policy platform (*Listens Then Acts: Labor's Plan for Building a Stronger and Fairer Community in Victoria*, 2002 p. 75.)
- reinstatement of export controls on the sale of woodchips.



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- a public review of the impacts of logging on water yield through application of the 'Macaque' model
- formalisation of ongoing community consultation and participation in forest management, including 'commercial' forest management
- establishment of the 'optimal yield' (i.e. the rate of logging that delivers the greatest benefit to all stakeholders in forest management) as recommended by Professor Jerry Vanclay and the Expert Data Reference Group (2002)
- introduction of mechanisms to ensure that forest management decision making is required to comply with ecologically sustainable development principles



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COMMUNITY INPUT INTO VICFORESTS' ACTIVITIES

Whilst VicForests will not be responsible for policy setting under the model outlined in the draft Directions Paper, it will still remain the interface between community and the Government 'on the ground' and as such should be established within a structure that accommodates ongoing communication and reporting to the community about the details of operations.

The draft Directions Paper does not specify the mechanisms for ongoing community input into the activities of VicForests, neither does it specify improvements for community participation in policy development. It is of major concern that VicForests might be established as an organisation that is unaccountable to the public and that logging operations will be concerned exclusively with generating profit. Friends of the Earth Melbourne does not believe this a preferable model to follow. We urge the Government to amend the draft Directions Paper so that it puts forward the establishment of VicForests as a State Owned Enterprise as an option not a finalised policy, and give the community the opportunity to put forward alternative models.

Processes for community involvement and input into the scheduling of coupes and monitoring of logging in public forests should be clearly stated in the Directions Paper. Friends of the Earth Melbourne considers that 'Timber Release Plans' should be released every year as opposed to every five years to allow DSE to consult with the community similarly to the public comment period of the current Wood Utilisation Plan system.

Public release of the Directions Paper as it now stands would send a message to the public that it is 'business as usual' with logging in the forests, a message that is inconsistent with the spirit of recent Bracks Government policies and election commitments. The announcement that Goolengook forest will not be logged but will be the subject of a public inquiry; that the Otways will be protected as national park (Forests and National Parks election policy, November 2002); as well as the commitment to establish Community Forest Management in the Wombat Forest (Forests and National Parks election policy, November 2002) and to review silvicultural practices in all forests to ensure they are ecologically sustainable (ALP election policy October 2002) signal a radically different approach to forest management than the previous Victorian Government.

The Government's draft Directions Paper unfortunately appears to depart from this positive shift. We urge you to take up our suggested amendments by incorporating them into the Government's final Directions Paper, and by developing a second paper on the policy and regulatory element of forest management.



Thank you for the opportunity to comment. We look forward to your response.

**Friends of
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Yours sincerely

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