

Submission to the Inquiry into Ecosystem Decline in Victoria
By David Graham Bennett [REDACTED]

As a professional forester who graduated from the School of Forestry at The University of Melbourne with an honours degree in 1989, I consider the focus of this inquiry to be of great significance. The majority of my working experience has been with the management of planted forests in Gippsland and more recently in Western Victoria. For the past 10 years, I have had the responsibility to maintain the management of systems of PF Olsen (Aus) Pty Ltd¹ (PF Olsen Australia) and ensure that they conform with the requirements of both the Sustainable Forest Management Standards² that operate within Australia. A core requirement of both these standards is that certified forest managers demonstrate that their management maintains and or enhances the biodiversity of the forests they manage.

In order to do this PF Olsen Australia has undertaken the following for the land it manages for timber plantations:

- All patches of remnant vegetation greater than five hectares have been surveyed by expert ecologists.
- Patches are rated for their significance based on the type of vegetation, the condition of the vegetation and their position in the landscape.
- Significant patches are fenced to excluding grazing stock.
- Strategic patches of revegetation are occurring in consultation with local CMA and Greening Australia.
- All patches are surveyed annually to ensure that their extent is not threatened.
- The annual surveys also check for any weed infestations or signs of damage from illegal firewood collectors.
- Significant patches are surveyed at least every 3 years to assess their condition and their fire hazard rating.

To supplement this, in order to check the contribution of the plantation estate to biodiversity at a landscape level. PF Olsen Australia has partnered with Birdlife Australia for the past 5 years to conduct annual spring surveys of the birds using the plantations. More than 100 species of birds have been seen either within planted forests or using patches of remnant vegetations adjacent to plantations. Importantly two conservation priority species have been seen. These are Brolga and Red-Tailed Black Cockatoo. In comparison with adjacent control sites in nearby State forest, plantations have a lower bird diversity. But the diversity of birds in the adjacent remnants is as good as the control sites. The key finding is that diversity is being maintained year on year³.

The other notable contribution that these plantations are playing is the provision of new habitat for koalas. This creates a wicked dilemma for the owners of these trees. They are faced with the added costs of protecting these animals while the plantations are harvested. In the last 12 months more money has been spent on looking for and protecting koalas than has been spent on building roads to extract the timber. It has also introduced a new health and safety risk, by introducing koala spotters into active logging sites.

Given this background, I raise the following issues for the consideration of the committee.

1. Victoria's legal framework for biodiversity protection is extremely fragmented. For plantation forestry there are at least seven statutes⁴ and four organisations⁵ we need to engage with to ensure that we comply with these obligations. This is clumsy and often frustrating. The committee is urged to consider how the simplification of these obligations could reduce costs and improve effectiveness. Importantly,

¹ PF Olsen Australia is Australia's largest independent forest manager and manages planted forests in New South Wales, South Australia, Tasmania, Victoria and Western Australia.

² These are:

- the Responsible Wood Certification Scheme, which requires verification of compliance with AS4807:2013 The Australian Standard for Sustainable Forest Management. This scheme is endorsed internationally by the Programme for the Endorsement of Forest Certification (PEFC).
- Forest Stewardship Council® Certification, which requires verification that forests are well-managed in accordance with Forest Stewardship Council®'s Principles & Criteria (FSC-STD-01-001 (V5-0)).

³ Kirk, H. McNee, S. and Herman, K. (2019) Bird biodiversity in forestry plantations across Southern Australia. <https://go.promapp.com/pfolsen/Documents/Minimode/Permalink?crypto=G0zujCiWt0470bQQJr8ARE>

⁴ Catchment and Land Protection Act 1994, Flora and Fauna Guarantee Act 1988, Environment Protection Act 1970, Planning and Environment Act 1987, Plant Biosecurity Act 2010, Prevention of Cruelty to Animals Act 1986 and Wildlife Act 1975.

⁵ Department of Environment, Land, Water and Planning, Environment Protection Authority, Catchment Management Authorities and local governments.

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each statute should be assessed to see whether it could be enhanced to promote transparency and accountability. But more fundamental change is required to promote better targeting of policies to achieve clearly specified environmental outcomes as efficiently as possible. Perhaps a single unifying statute build around a concept of overriding duty of care to maintain and enhance biodiversity that is enforced across all land tenures by a single well-resourced agency would be the best outcome.

2. Current regulatory frameworks and policy settings provide no recognition of the positive contributions that planted trees, either commercial or non-commercial, can play in providing more opportunities for native species at a landscape scale. In fact, the experience highlighted above with koalas indicates that good land management that results in the creation of new habitats for native species may in fact lead to a significant financial impost for diligent managers. The committee must urgently consider how public benefits generated by private investment can be incentivised and work to develop simple and equitable cost-sharing arrangements.
3. The application of the precautionary principle via clause 2.2.2.2 of the Victorian Code of Practice for Timber Production 2014 and recently published decision of the Federal Court⁶ increases uncertainty for investors in forestry plantations. While accepting that the precautionary principle is a foundational doctrine for biodiversity conservation it is important that practitioners who actively engage with Victoria's forests are provided with the tools to make decisions confidently that are in the best interests of Victoria. My view is that each of Victoria's agencies tasked with management of Victoria's forests should be held to the same standard so that all of the work involved in preserving and improving the fate of rare and threatened species does not fall unequally on organisations involved with the commercial exploitation of trees. Reading the decision it is hard to understand why the Department of Environment, Land, Water and Planning had not developed management plans for both Leadbeaters Possums and Greater Gliders to help VicForests meet their obligations and why the National Parks Service aren't require to do population surveys of these species at the same intensity in the areas of forest that have been set aside for conservation purposes. The committee should ensure that agencies with the predominant purpose of protecting and preserving Victoria's crown land estate are held to the higher level of accountability for transparent biodiversity outcomes compared to managers seeking to generate economic returns from their land.
4. It is important, in a carbon constrained economy that policies for the sustainable production of timber from Victoria's natural and planted forests are also considered when revising the legal framework and policy settings for restoring habitats and populations of threatened and endangered species. Forestry is one land use that can simultaneously:
 - Provide a permanent store for atmospheric carbon dioxide;
 - Make significant economic contributions to rural and regional Victoria; while
 - Maintaining or enhancing biodiversity within the landscape

The committee must renew the Victorian government's commitment to a prosperous timber industry and reinforce the role that the industry can play in cost effectively enhancing the habitats and populations of native species across the Victorian landscape.

Please note the views expressed in this submission are mine alone. While I have made reference to the work I am currently engaged to do by PF Olsen Australia, the company has had not direct input into this submission.

Yours sincerely,



David Graham Bennett

⁶ Friends of Leadbeater's Possum Inc v VicForests (No 4) [2020] FCA 704 (27 May 2020)