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Major Event Review for Victoria's Fire Impacted Forests

Friends of the Earth (Melbourne) is a membership based environmental organisation which has been active in Victoria for 47 years. We welcome the opportunity to provide comments on the Major Event Review (MER) on the impact of the 2019-20 bushfires on native forests and the native forest logging industry.

By undertaking a joint review to assess the impacts of major events, such as bushfire, in relation to the objectives and operation of the Regional Forest Agreements (RFAs), the MER process can identify remedial actions that may be needed. While we understand that the review will not open the RFAs for renegotiation, it is clear that since the RFAs were signed, there has been a radical reduction in available timber and a profound transformation of the Alpine Ash forests in the far east of the state, and climate change impacts have become evident, and this must inform any remedial actions which are proposed.

As is noted in the MER document and many other reports, the ecological, social and economic impacts of the 2019/20 fires were enormous. The fires had a dramatic impact on many forests which are available for logging as well as protected areas within state forest, national parks and other conservation reserves. Many of the ecological consequences of the fires are not yet fully understood. Some actions taken after the fires, specifically salvage logging of burnt forests, will compound the damage caused by the fires. It is essential that the precautionary principle be applied to all decision making about how forests are to be managed.

Because of the loss of many production forests in the 2019/20 fires, there are clear implications for the planned phaseout of native forest logging by 2030 and Victoria's RFAs.

Key issues

Fires have increased pressure on threatened species and increased the ecological value of unburnt areas

It is clear that the 2019/20 bushfires have had devastating impacts on Victoria's forests and wildlife in the east of the state. Many forest dependent species were

already negatively impacted by the cumulative impacts of drought, bushfires, and logging

Logging operations have greatly modified large areas of forest throughout Victoria in recent decades, and the operation of the Regional Forest Agreements continues to be a disaster for the survival of forests and wildlife. In many sections of the east of the state specific areas have been burnt more than once since 2000, and this has a compound effect on the impact of the 2019/20 fires.

Many bushfire-affected threatened species have logging listed as a major threat in their FFG Act Action Statements. The state government's own risk assessment of threatened species and habitats carried out in October 2020 notes the toll logging has had on threatened wildlife.

Despite the extensive bushfire impacts on wildlife and forests, and the undeniable increase in the habitat value of remaining unburnt areas, pre-fire logging plans have remained in place. There have not been any reductions or substantive changes to existing logging plans since the bushfires. Additionally, two extra schedules of new logging areas have been announced post fire, one approved in July 2020, and another in December 2020.

In May 2020, the Victorian government's Environment Department recommended that logging stop in key unburnt habitat for threatened species to halt the threat of irreversible damage to biodiversity after the 2019-20 bushfires.

Future logging plans are a significant threat to forests and wildlife. Across the 10 refuge areas, 553 logging coupes covering more than 20,000 ha of forests are planned for logging by the Victorian government's logging agency across the Central Highlands, Gippsland, and Alpine areas.

The existing reserve system must be reconsidered in light of the fires

Scientists from the Threatened Species Recovery Hub made recommendations in January 2020 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". A number of key refuges for wildlife have already been logged, and many more are up for logging.

Almost half of the conservation parks, reserves and Special Protection Zones within the Comprehensive, Adequate and Representative (CAR) reserve system in these three FMAs is within the fire footprint. The bushfires also heavily impacted the proposed Immediate Protection Areas (IPAs), which were announced in November 2019, and intended as new conservation measures for the threatened Greater Glider. Approximately 90% of the IPAs in East Gippsland were burnt, with a large proportion subject to high severity fires.

Climate change is driving longer and more intense fire seasons

The bushfires of 2019-20 are the third landscape-scale fires to burn through over a million hectares in Victoria during the last 20 years. In terms of massive fires (greater

than 250,000 hectares), Victoria experienced two such events in the 19th century and five in the 20th century. In the first two decades of the 21st century, we have already had three mega fires. This increase in frequency and intensity should be a key consideration of the Major Event Review.

As noted by the Victorian government's 'Climate Science Report 2019',

'There has been an increase in dangerous fire weather and the length of the fire season across southern Australia since the 1950s'.

Many government initiated inquiries have identified the link between climate change and fire risk and intensity, for instance:

The Royal Commission into National Natural Disaster Arrangements, also referred to as the **Bushfire Royal Commission** was explicitly asked to look at mitigation options, but not drivers of global heating. In spite of this, it found that further warming of the Australian climate over the next 20 years "appears to be inevitable," meaning that catastrophic bushfire conditions will become more common.

The **NSW Bushfire Inquiry** found that "climate change as a result of increased greenhouse gas emissions clearly played a role in the conditions that led up to the fires and in the unrelenting conditions that supported the fires to spread".

In Victoria, the report into the 2019/20 fires produced by the **Inspector-General for Emergency Management** (IGEM) said "the incidence of large, severe and recurrent bushfire events in Victoria has increased exponentially over recent decades and shows no sign of slowing."

As has been noted by DELWP, with climate change driving an earlier start to the bushfire season, with more bushfires starting in spring – when winds are often strong – this 'may also change fire weather conditions that are experienced, such as wind speed and direction' (source).

The current Regional Forest Agreements (RFAs) have 16 clauses that mention climate change. Climate change is mentioned over 40 times in the East Gippsland RFA and similar in other RFAs. Yet the Major Event Review summary document does not mention climate change. This is a significant oversight.

The implications for climate, the links to extreme fire and the combined impact of logging should be assessed in detail and at regional scale in the Major Event Review. Climate change will have profound impact on the capacity of the forest to supply both wood/pulp, habitat and other ecological services like water in the future.

The MER should specifically address climate resilience actions as identified in the RFAs, such as:

- Ensure all EVCs that are Climate Change Vulnerable are afforded additional protections beyond that provided for under the JANIS Reserve Criteria.
- The identification and protection of refugia.
- Protect important occurrences of the species or community in the CAR Reserve System and maintain or restore ecological management regimes to ensure its viability.

- Improve climate change resilience and future viability of Listed Species and Communities and other MNES informed by best practice approaches, best available science and Traditional Owner knowledge.

Impacts on Alpine Ash forests

As is noted in the MER report, most of the area burnt in the 2019–20 bushfires was fire-tolerant mixed-species eucalypt forest. These species typically survive most fires and regenerate by resprouting after the fire event.

However, Ash species (Mountain Ash and Alpine Ash) were also affected by the bushfires. While they can survive low intensity fire, Ash species are typically killed by high severity fire and regenerate through seeds that are released from the canopy. If Ash trees are killed before they reach seed-bearing age (around 20 years), Ash forests may not regenerate without intervention. Large areas of Ash forests in Victoria have been impacted by recurring fires since 2003, meaning there was an extensive area of immature Ash forest in the landscape in the lead-up to the 2019–20 fire event. The total area of Ash forest impacted by the bushfires in 2019–20 is 4,286 hectares of Mountain Ash forest and 52,516 hectares of Alpine Ash forest. It is estimated that 11,500 hectares of immature Ash forest was impacted by high severity fire in 2019–20. It is clear that Victoria's ash forest estate is now far more immature than 20 years ago and this must be considered in any review of the RFA.

The Bushfire Recovery Project is tracking forest regrowth in NSW and Victoria after the 2019/20 fires, using data gathered by citizen scientists, and gives some insight into how affected forests are recovering.

Their report has found that while low elevation forests appear to be recovering well, forests in some subalpine areas '*near Mount Kosciuszko and in Victoria's East Gippsland region are struggling to recover from the 2019-20 bushfires'.*

This is consistent with everything we already know about the impact of climate driven fire seasons on the higher elevation Alpine Ash forests.

According to research published in a report called '*Biological responses to the press and pulse of climate trends and extreme events',* Alpine Ash forests face the prospect of ecological 'collapse'.

The mountain forests in the east of the state, which are dominated by Alpine Ash trees are now so threatened by fire and the prospect of collapse that the state government has an aerial seeding program to stop the collapse of these forest systems.

Following the 2013 Harrietville-Alpine Bushfire, the Department of Sustainability and Environment, or DSE – now DELWP) and Parks Victoria initiated a rapid response forest recovery program, which aimed to restore Alpine Ash forests that had been burnt in 2003 and/ or 2006/7 and where only limited numbers of parent trees had survived. Since then, the program has been expanded considerably as more areas have been burnt multiple times.

In October 2020, it was announced that:
'The Victorian Government is undertaking the largest forest restoration effort in the state's history with a $7.7 million operation that airlifted tonnes of eucalypt seeds into areas of forest devastated by last summer's fires.

Associate Professor in Forest and Landscape Dynamics at Melbourne University Craig Nitschke says that:

'A projected warming and drying climate, possibly with more lightning, is likely to lead to increasingly frequent, severe fires. The hotter, drier conditions will also constrain the capacity of both alpine ash and mountain ash to recover from disturbance, by reducing tree growth, seed production and seedling establishment. Reduced growth, combined with shorter intervals between high-severity fires, will result in 'interval squeeze', which can threaten these species' persistence as the climate changes' (source).

Given the heavy current reliance on Alpine Ash forests by the timber industry, and with the vegetation community facing the prospect of ecological collapse, it is essential that the Review look at greatly reducing the reliance on these forests in any further timber harvesting between 2021 and the cessation of native forest logging.

Protecting native forests increases carbon storage

The RFAs commit both governments to the goals, objectives and implementation of the National Forest Policy Statement, which includes an expectation that forests will be managed to 'maintain or increase their 'carbon sink' capacity and to minimise the emission of greenhouse gases from forest activities'.

As has been noted by DELWP, the Mountain Ash forests of the Central Highlands contain the highest density of carbon in the world – storing about 1,867 tonnes of carbon per hectare. Yet we know that the bulk of trees cut in commercial operations are either burnt in the coupe or converted to short lived products such as paper. 'Most native trees cut down in Victoria become woodchips, pulp and pallets, which have short lifespans before going to landfill. In landfill, the wood breaks down and releases carbon back into the atmosphere' (source).Therefore, reducing broad acre logging will improve the ability of these forests to assist in stabilising the climate through safely storing carbon.

Recommendations

Logging, including so-called salvage logging operations, must be fully suspended in East Gippsland and the Alpine areas, and should be suspended elsewhere in forests that contain threatened species impacted by the fires.

A moratorium on logging is urgently needed, at least until there can be comprehensive, well-resourced surveys undertaken as part of the Major Event Review, and required protections are put in place for threatened species. The recently announced VEAC review provides the opportunity for that to happen and it is essential that the MER not preempt further protection of forests.

Government should bring forward the 2030 transition out of native forest logging to 2024. In November 2019, the Victorian government committed to a decade-long transition out of native forest logging. This timeframe was too slow even before the bushfires and the resulting devastating impact on forests and wildlife. Now there is an even more urgent need to rapidly transition the logging industry out of native forests.

The state government should:

- deliver a transition Plan to expedite the protection of native forests and ensure that workers, communities, and regions have the economic support needed to gain alternative, ecologically sound employment. The government should bring forward the complete shut down of native forest logging to 2024.

- expand the brief of the Latrobe Valley Authority to explicitly include assisting workers currently employed in the forestry sector and roll out similar support programs in other affected areas of the state, such as the Central Highlands.

- prioritise, support, and make way for First Nations initiatives for caring for Country when determining the future management of forests e.g. cultural cool burning for bushfire prevention and regeneration, fire programs for weed management, flooding for wetland and waterway restoration etc. Government should also genuinely engage with and finally respond to the Sovereign People For Country's Sovereigns on Forest Statement 2019. An end to the logging of Country and the return of public forest to First Nations people for their cultural and economic benefit should be a part of the Treaty process.

- commit to spending a minimum of 1% of the state budget each year to fund the work of Parks Victoria in managing our parks and reserves, in addition to funds and support for First Nations management.

- base future forest management decisions on the robust research of experts and scientists studying these ecosystems, such as Professor David Lindenmayer and Chris Taylor.

- allocate resources for large-scale ecosystem restoration and reforestation programs on public and private lands across Victoria to combat the climate and biodiversity crises and create secure, dignified work in regional areas.

- support ecologically sound agroforestry initiatives to source timber and non timber sources of fibre in affected regions.

- provide sufficient funding for the state's firefighting capacity (via FFMV) to ensure all fire sensitive vegetation communities - rainforest, peatland, snow gums and alpine ash, and mountain ash communities can be protected from wildfire. As was shown by the 2019/20 fires, the state does not have the resources to control wildfire at the landscape level in bad seasons. There are demands on fire fighting capacity in other states and this will impact on the ability of Victoria to fight fires in coming seasons.

Australia drew on 1,000 overseas firefighters during the 2019/20 summer, higher than in previous seasons. However, with fire seasons also becoming longer in the northern hemisphere, we cannot assume we can continue to rely on such large numbers in future. We share resources with other states and territories and longer seasons across the country will add pressure to existing volunteer and career firefighters. It has to be expected that covid will impact on movement of firefighters from overseas for at least a couple of summers. During the summer of 2020/21 Victoria had around 1,100 paid firefighters employed by Forest Fire Management Victoria (FFMV) and other agencies. It adds at least 300 additional fighters every summer to its permanent force. Up to 2,000 current staff in agencies like DELWP, Parks Victoria, Melbourne Water and VicForests can also be deployed, who have a 'fire role in addition to their normal duties'. The Victorian government clearly understands the need to properly resource fire fighting efforts.

However, it is clear that as part of our response to climate change we need additional resourcing.

The Victorian government should increase the number of remote area fire fighters for the next fire season.

Additional recommendations on fire fighting capacity can be found in the Friends of the Earth report *An Icon at Risk: current and emerging threats to the Victorian Alps* (available here).

The government should also prepare Recovery Plans for species both impacted by the fires and threatened by ongoing logging, and update the Conservation Advice. Recovery Plans are critical to protecting listed species, yet many species that are at risk of extinction still have no Recovery Plans. The work to finalise these Plans is now even more urgent due to the fires. Some listed species have Plans that were written in the 1990s and have not been substantively updated or strengthened since then, despite ongoing species decline.