



To:  
Department of Environment Land Water and  
Planning, 8 Nicholson st, Melbourne 3000

19<sup>th</sup> April, 2018

Via email- [geco@geco.org.au](mailto:geco@geco.org.au)

**Re: Logging in Squirrel's Paw coupe in breach of DELWPs obligations to protect Montane  
Grassy Woodland**

To DELWP staff,

Logging in coupe 892-507-0020 "Squirrel's Paw" is likely to be occurring now and logging in adjacent coupe 892-507-0010 is likely to commence shortly.

Coupes 892-507-0020 and 892-507-0010 contain the ecological vegetation class Montane Grassy Woodland, listed as Vulnerable on the Department of Sustainability and Environment Bioregional Conservation Status for each BioEVC<sup>1</sup>.

The levels of protection for rare, vulnerable and endangered forest ecosystems within a Comprehensive Adequate and Representative (CAR) reserve system are set out in the East Gippsland Forest Management Plan Amendment (EGFMPA), published by the Department of Natural Resources and Environment in 1997.

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<sup>1</sup>Bioregional Conservation Status for each BioEVC, Department of Sustainability and Environment  
[https://www.environment.vic.gov.au/data/assets/pdf\\_file/0012/50511/Bioregional-Conservation-Status-for-each-BioEVC.pdf](https://www.environment.vic.gov.au/data/assets/pdf_file/0012/50511/Bioregional-Conservation-Status-for-each-BioEVC.pdf)

The EGFMPA describes the JANIS criteria that require at least 60% of the remaining extent of all vulnerable forest ecosystems be included within the CAR reserve system<sup>2</sup>.

Criteria 6.1.2 of the Nationally Agreed Criteria for the Establishment of a Comprehensive, Adequate and Representative Reserve System for Forests in Australia states 'Where forest ecosystems are recognised as vulnerable, then at least 60% of their remaining extent should be reserved'<sup>3</sup>

Table 12 in the Final Report on Progress with Implementation of the Victorian Regional Forest Agreements (RFAs) - An update to the December 2009 Draft Report on Progress, displays data of the current representation of Ecological Vegetation Classes in the East Gippsland RFA region (as at 2009)<sup>4</sup>. The area in hectares (ha) for Montane Grassy Woodland is 300ha in Highlands Southern Fall Bioregion, 860ha in East Gippsland Uplands Bioregion, 3670ha in the Victorian Alps Bioregion and 5930ha in the Monaro Tabelands Bioregion. The total area of the 2009 extent of Montane Grassy woodland is 10760 ha.

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<sup>2</sup> East Gippsland Forest Management Plan Amendment (EGFMPA), published by the Department of Natural Resources and Environment, 1997

<sup>3</sup> Nationally Agreed Criteria for the Establishment of a Comprehensive, Adequate and Representative Reserve System for Forests in Australia, a Report by the Joint ANZECC / MCFFA National Forest Policy Statement Implementation Subcommittee, Commonwealth of Australia 1997

[http://www.agriculture.gov.au/SiteCollectionDocuments/rfa/publications/nat\\_nac.pdf](http://www.agriculture.gov.au/SiteCollectionDocuments/rfa/publications/nat_nac.pdf)

<sup>4</sup> Final Report on Progress with Implementation of the Victorian Regional Forest Agreements (RFAs) An update to the December 2009 Draft Report on Progress including additional information as recommended by the Independent Reviewer, State of Victoria Department of Environment and Primary Industries Melbourne 2014  
[https://www.forestsandreserves.vic.gov.au/data/assets/pdf\\_file/0033/89556/Victorian-RFAs-five-yearly-review-report-November-2017.pdf](https://www.forestsandreserves.vic.gov.au/data/assets/pdf_file/0033/89556/Victorian-RFAs-five-yearly-review-report-November-2017.pdf)

According to the data in Table 12 referred to in the above paragraph, the area of Montane Grassy Woodland that is currently included in the CAR reserve system is 100 ha in the Highlands Southern Fall Bioregion, 340 ha in the East Gippsland Uplands Bioregion, 3260 ha in Victorian Alps Bioregion and 600 in the Monaro Tablelands Bioregion. The total area of the 2009 extent of Montane Grassy Woodland within the CAR reserve system is 4300 ha.

4300 ha of Montane Grassy Woodland in the CAR reserves represents 40% of the remaining 10760 ha extent (2009) of Montane Grassy Woodland.

At the bioregional scale Montane Grassy Woodland EVC occurs in four Bioregions. It is recognized as Vulnerable in the East Gippsland Uplands Bioregion and the Monaro Tablelands Bioregion.

Coupes 892-507-0020 and 892-507-0010 occur within the Monaro Tablelands Bioregion where the current extent of Montane Grassy Woodland is 5,930 ha and the EVC is recognised as Vulnerable. Within the Monaro Tablelands Bioregion, 600 ha of Montane Grassy Woodland falls within the CAR reserve system.

Based on the figures in Table 12 in the Final Report on Progress with Implementation of the Victorian Regional Forest Agreements (RFAs) just 10% of the remaining extent of Montane Grassy Woodland within the Monaro Tablelands EVC falls within the CAR reserve system. Of the the remaining extent of Montane Grassy Woodland in the East Gippsland Uplands Bioregion, where the EVC is recognized as Vulnerable, 40% falls within the CAR reserve system.

The fixed zoning rules, section 4.6.1.2 of the *Planning Standards for Timber Harvesting Operations in Victoria's State Forests, Appendix 5 to the Management Standards and Procedures for timber harvesting operations in Victoria's State forests 2014* require the Department to “Maintain a CAR reserve system consistent with the JANIS criteria”.<sup>5</sup>

The Spatial data set NV 2005 EVCBCS depicts the Montane Grassy Woodland EVC within coupes 892-507-0020 and 892-507-0010. The remaining unlogged area of coupe 892-507-0020 “Squirrel’s Paw”, where logging has recommenced this week is mapped mostly as Montane Grassy Woodland.

Approximately 65 ha of Montane Grassy Woodland depicted on the NV 2005 EVCBCS spatial data set has been logged in adjacent coupes 892-507-007 and 892-507-0005.

Section 2.2.2.1 of the Code of Practice for Timber Production in Victoria’s state forests 2014 requires that ‘Planning and management of timber harvesting operations must comply with relevant biodiversity conservation measures specified within the Management Standards and Procedures.’<sup>6</sup>

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<sup>5</sup> Planning Standards for timber harvesting operations in Victoria’s State forests 2014 Appendix 5 to the Management Standards and Procedures for timber harvesting operations in Victoria’s State forests 2014, Department of Primary Industries, 2014  
[https://www.forestsandreserves.vic.gov.au/\\_data/assets/pdf\\_file/0021/29307/Planning-Standards-for-timber-harvesting-operations-in-Vics-State-forests-2014.pdf](https://www.forestsandreserves.vic.gov.au/_data/assets/pdf_file/0021/29307/Planning-Standards-for-timber-harvesting-operations-in-Vics-State-forests-2014.pdf)

<sup>6</sup> Code of Practice for Timber Production 2014, Department of Environment and Primary Industries 2014

To comply with the fixed zoning obligations, set out in the *Planning Standards for Timber Harvesting Operations in Victoria's State Forests, Appendix 5 to the Management Standards and Procedures for timber harvesting operations in Victoria's State forests 2014*, specifically the Department must act to cease logging in coupes 892-507-0020 and 892-507-0010 and ensure the CAR reserve system is being maintained consistent with the JANIS criteria requirements to maintain percentage thresholds for protection of rare, vulnerable and endangered EVCs.

- DELWP must direct VicForests to stop logging in coupe 892-507-0020 and include the remaining Montane Grassy Woodland in the CAR reserve system.
- DELWP must undertake to assess the current status of protection for all vulnerable, rare and endangered EVCs and increase the size of the CAR reserve system to ensure 60% of forest ecosystems recognised as vulnerable are reserved.
- Any further logging in coupes 892-507-0020 and 892-507-0010 will likely impact upon Montane Grassy Woodland that may be required for protection with the CAR reserves.
- Please provide our organisation with a response to this letter and details of actions DELWP will take as a matter of urgency.



Ed Hill – Goongerah Environment Centre