

FAILED REGENERATION AT MT. DELUSION AREA, EAST GIPPSLAND

REPORT BY GOONGERAH ENVIRONMENT CENTRE, NOVEMBER 2019

Logging coupes in the Mt Delusion area were inspected in the month of October 2019. Several coupes that were logged by VicForests between the years of 2010 and 2017 were observed to be failing to regenerate. Seven of these coupes had been removed from VicForests Timber Release Plan in April 2019 despite failed regeneration works.

This report provides evidence that VicForests has removed at least seven coupes from the TRP in April 2019 that have failed to regenerate, in non compliance with the conditions of the Allocation Order and in breach of the Sustainable Timber (Forests) Act 2014. Evidence of a number of other coupes that remain on VicForests TRP where regeneration works have failed is provided below and questions are raised over whether VicForests' forest management activities can ensure successful regeneration of mature forest currently being logged in the 'Duped' 770-507-0016 coupe and the 'Bucket Mouth' 771-507-0022 coupe, where significant numbers of threatened Greater Gliders were recently report to VicForests and DELWP.¹

REGENERATION REQUIREMENTS:

The following is an excerpt from the Agriculture Victoria website (DJPR)²

Post harvest regeneration

Under Part 5 of the Sustainable Forests (Timber) Act 2004 (the Act), VicForests must prepare a TRP in relation to the Allocation Order for undertaking management activities associated with timber harvesting including forest regeneration. TRPs must also be consistent with the Allocation Order and any relevant Code of Practice related to timber harvesting.

*The Code of Practice for Timber Production 2014 specifies that harvested areas of native forest must be successfully regenerated. The minimum regeneration standards are outlined the Management Standards and Procedures for timber harvesting operations in Victoria's State Forest 2014. **When VicForests has measured that a coupe has successfully regenerated, that coupe can be removed from the TRP.***

Clause 18 of the Allocation Order states that VicForests must submit an annual report to the Secretary to DJPR by 30 September each year describing the area of timber harvested and regeneration results for the preceding financial year for ash and mixed species forest stand types. DJPR will continue to monitor VicForests' regeneration results.

¹ https://faunaandfloraresearchcollective.files.wordpress.com/2019/10/191018-new-rush-creek_mount-delusion-771-507-0022-greater-glider-detections-etc-ffrc.pdf

² <http://agriculture.vic.gov.au/agriculture/forestry/timber-allocation-order>

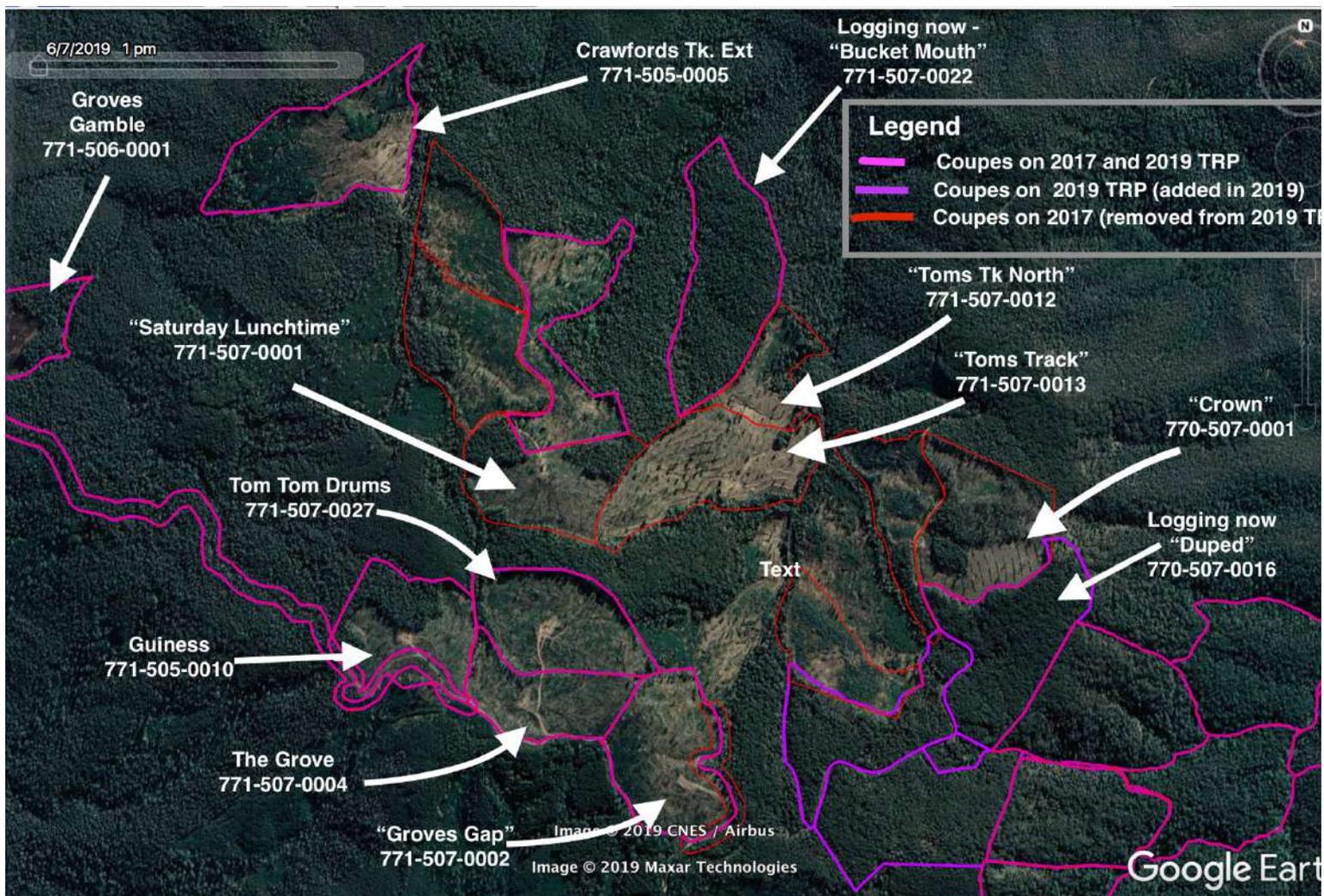
The evidence presented below shows that at least three coupes have been removed from the TRP that have not met the minimum regenerations standards outlined in the Management Standards and Procedures.

FAILED REGENERATION COUPES REMOVED FROM TRP

In April 2019 VicForests removed at least seven coupes in the Mt Delusion from the TRP that have clearly failed to regenerate. This appears to be a breach of the conditions of the Allocation Order and therefore a breach of Sustainable Forests (Timber Act).

These coupes are Saturday Lunchtime 771-507-0001, Toms Tk North 771-507-0012, Toms Track 771-507-0013 and Crown 770-507-0001, Paspalum 773-501-0022, Buffalo Grass 773-501-0008 and The Farm 722-504-0005. Additionally, New Rush Clearfell 771-507- 0014 (logged in 2011) has also failed to regenerate and was removed from the TRP some years ago.

FIGURE 1: Overview of Mt Delusion coupes with failed regeneration coupes (See ages on page 9 for coupes Paspalum 773-501-0022, Buffalo Grass 773-501-0008 and The Farm 722-504-0005.



SATURDAY LUNCHTIME 771-507-0001:

This coupe was Alpine Ash forest. It was logged January 2016 and removed from the TRP in April 2019. Satellite imagery indicates this coupe has failed to regenerate and on ground site inspections confirmed this.

This coupe is contiguous with “Toms Track” and “Toms Track North” coupes that have also been removed from the TRP, see overview image above. Together these coupes form an area of approximately 63 hectares that was Alpine Ash forest and is now dominated by grasses and introduced blackberry.

PHOTO 1: ‘Saturday Lunch’ time coupe in October 2019 after removal from TRP, grasses and blackberry are the dominant vegetation



PHOTO 2 AND 3: Old growth Alpine Ash stumps, logged in Saturday Lunchtime coupe in 2016



“TOM’S TRACK NORTH” 771-507-0012

This coupe was Alpine Ash forest, it was logged in 2010 / 2011 and removed from the TRP in 2019. Site inspection clearly showed it has failed to regenerate.

PHOTO 4 AND 5: Toms Track North coupe in October 2019



“TOM’S TRACK” 771-507-0013

This coupe was Alpine Ash forest, it was logged in 2010 / 2011 and removed from the TRP in 2019. Site inspection clearly showed it has failed to regenerate. Grasses and introduced Blackberry is the dominant vegetation.

PHOTO 6 AND 7: Toms Track coupe in October 2019



“CROWN” 770-507-0001 - FAILED REGENERATION

“DUPED” 770-507-0016 - ACTIVE LOGGING (NOVEMBER 2019)

The Crown coupe was logged in 2016, it was mature Alpine Ash mapped as old growth forest by the Modelled Old Growth 2009 data set. It was removed from the TRP in 2019. Satellite imagery shows this coupe has failed to regenerate. The Crown coupe is directly adjacent to the ‘Duped’ coupe where logging is occurring at the time of writing (November 2019). According to VicForests coupe plan for ‘Duped’ the coupe is being logged with the clearfell silviculture method which is the standard method for harvesting Alpine Ash forests. It is the same method employed in other coupes in the area that have failed to regenerate.

The Duped coupe was added to the TRP in April 2019 when the ‘Crown’ coupe was removed from the TRP. The Duped harvest plan map displayed at Fig 2 shows the harvest boundary on the north west end of the coupe will directly align with the area of failed regeneration in the Crown coupe.

It is the view of our organisation that no further coupes should have been added to TRP in the Mt. Delusion area (Mc Guinness Creek, Strobridge, East Wentworth, Mt Delusion forest blocks) until VicForests can ensure their harvesting will not result in failed regeneration and until they have successfully regenerated all coupes in the area. Additionally, no further logging should occur in coupes already existing on previous iterations of TRPs in this area until these issues are resolved.

A number of high conservation values have been detected within the ‘Duped’ coupe including Powerful Owl, Sooty Owl and Greater Glider and hollow bearing trees that these species rely upon for habitat. The significant extent of failed regeneration in this area has greatly reduced habitat availability for these species yet VicForests continues to log in areas where these species have been found using harvest and regeneration systems that are failing to ensure appropriate regeneration and are demonstrably leading to a significant reduction in habitat for threatened species. VicForests continues to log Alpine Ash forests in this area despite clear evidence that its regeneration systems are failing.

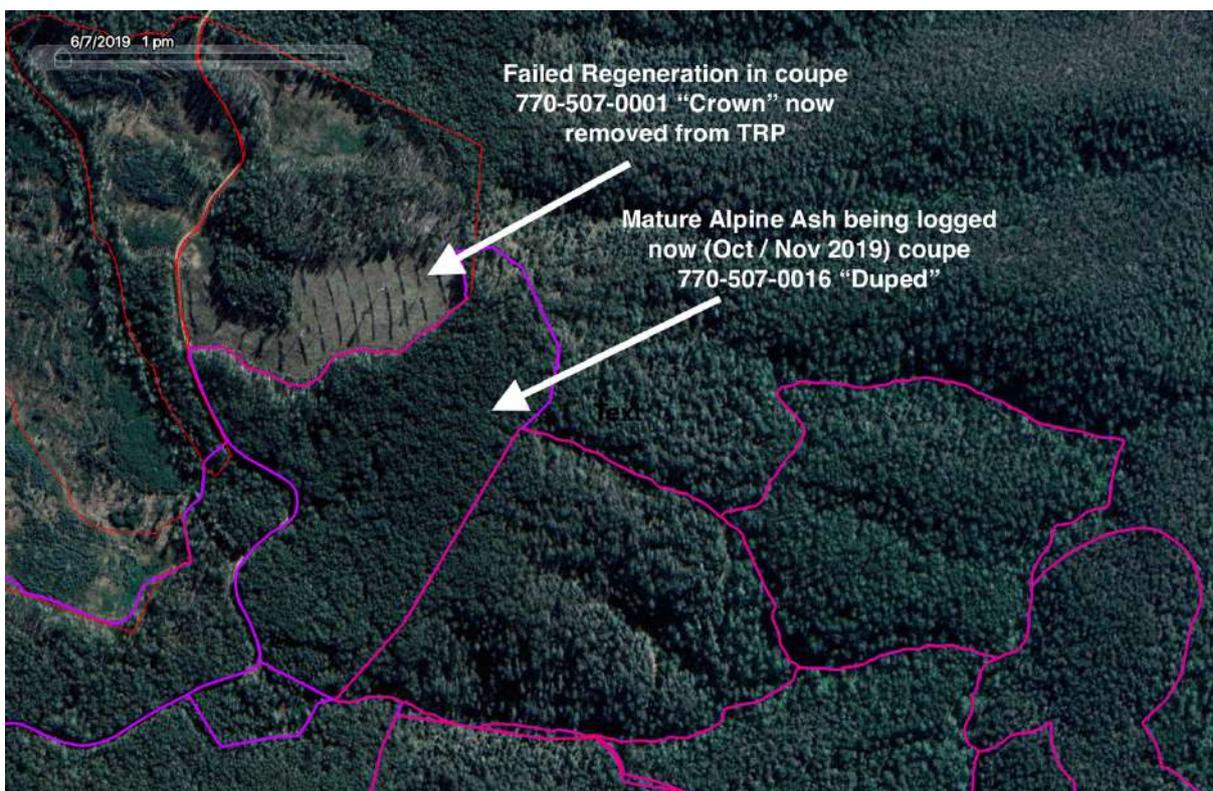
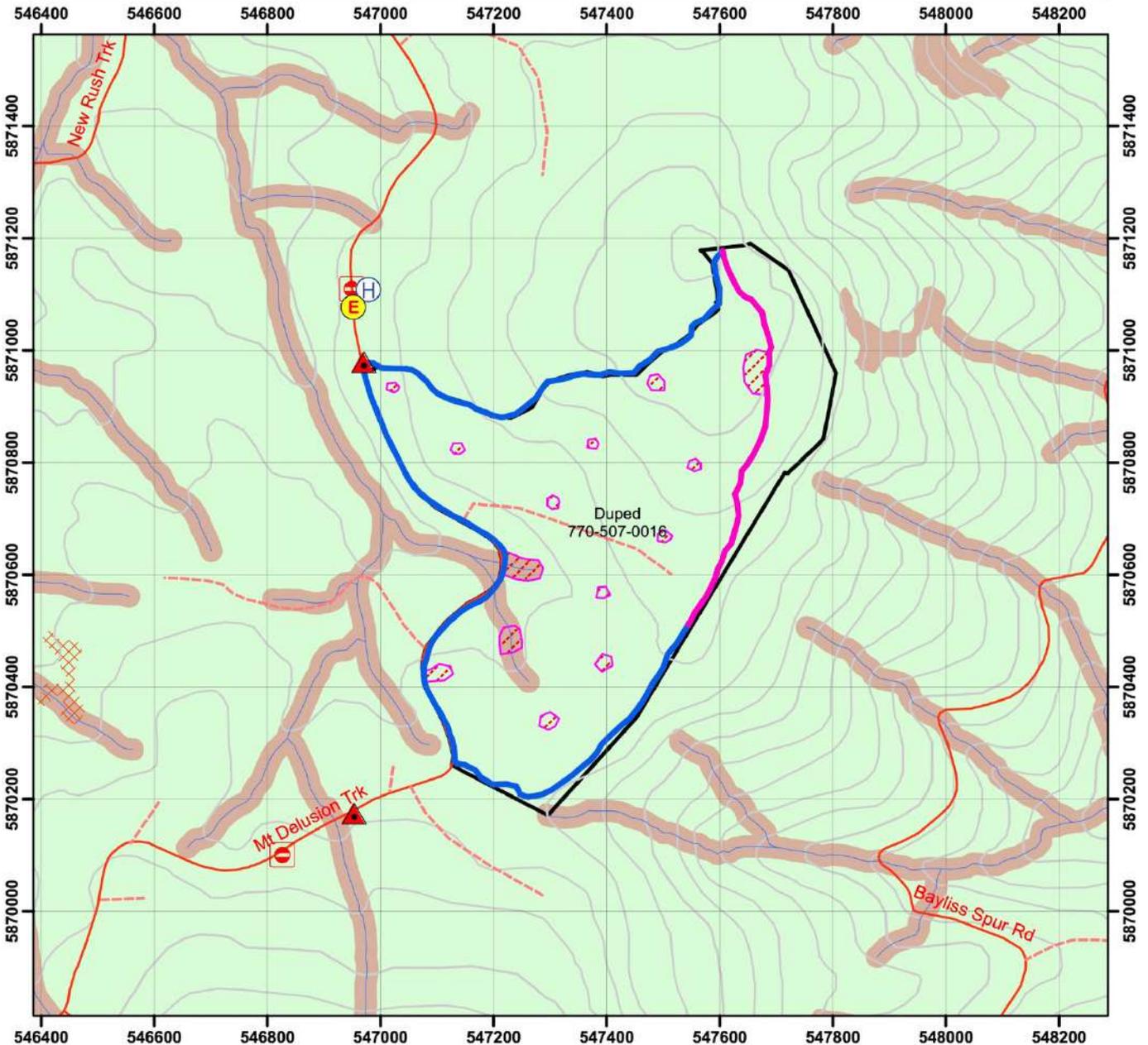


FIGURE 2: VICFORESTS OPERATIONS MAP FOR 'DUPED' COUPE



Operations Map

FMA:	TB	District:	Swifts Creek	Gross Area ha:	40.56
Coupe Address:	770-507-0016	Easting/Northing (MGA55):	547357 5870670	Est Nett. Area:	34.8ha
Coupe Name:	Duped	Lat/Long:	37d 18m 34s S 147d 32m 4s E	Silvic System:	CFE



Forest Management Zones <ul style="list-style-type: none"> General Management Zone Special Management Zone Special Protection Zone Code of Forest Practice Other Public Land Conservation Parks and Reserves Other Parks and Reserves OPR - Limited Timber Harvesting Plantations Commonwealth Land 	Coupe Boundaries <ul style="list-style-type: none"> Approved TRP Coupe Approved TRP Driveway Harvest Unit/ Roadwork Unit Marked Nett Area (if different to Harv/RW Unit) Traffic Management <ul style="list-style-type: none"> Signage Stop/Go Control Point Barrier/Gate Other 	Actual Features <ul style="list-style-type: none"> Stream Crossing Actual Landing Location Actual Exclusion Area (includes retained habitat) Hazards Layer TRACKS <ul style="list-style-type: none"> Actual Coupe Access Snig Tracks Existing Side-Cut Boundary Trail Other MARKING <ul style="list-style-type: none"> Buffer Filter General 	Additional Features <ul style="list-style-type: none"> Water Point Helipad Emergency Evacuation Point Other Planned Features <ul style="list-style-type: none"> Proposed Landing Site Proposed Exclusion Area 	Map Scale 1:10,000
VicForests Allocation 2019 <ul style="list-style-type: none"> Ash Mixed Species Unallocated 			Map Projection: MGA55 	
Map Date: 4/09/2019 Map Template: 02-02 -- 15-01-2014 Produced By:				

Disclaimer: This map is generated from VicForests and Victorian Government data and may be of assistance to you. However, VicForests does not guarantee that the publication is without flaw of any kind and therefore disclaims all liability for error, loss or damage which may arise from

PASPALUM 773-501-0022 AND BUFFALO GRASS 773-501-0008

Paspalum coupe was logged in 2015 and Buffalo Grass in mid 2016. Both coupes are failing to regenerate and have now been removed from the TRP



THE FARM - 722-504-0005

This coupe was logged in 2011 and removed from the TRP in April 2019, it has failed to regenerate, see image below, The Farm coupe is outlined with red.



COUPES REMAINING ON THE TRP THAT ARE FAILING TO REGENERATE

Several other coupes in the Mt Delusion area are failing to regenerate that remain on VicForests TRP. These are: 771-507-0002 Groves Gap, 771-507-0002 Groves Gamble, The Grove 771-507-0004, Tom Tom Drums's 771-507-0027, Guinness 771-505-0010, Crawfords Tk. Ext. 771-505-0005 and

There does not appear to be any regeneration efforts occurring in these coupes. Based on the recent removal from the TRP of the un regenerated coupes detailed above these coupes may also be removed in breach of the Allocation Order conditions and Sustainable Forests (Timber) Act 2014.

771-507-0002 GROVES GAP

This Alpine Ash coupe was logged in 2016 and 2017. The post logging burn has killed almost every retained tree. The area has failed to regenerate and is now dominated by grasses and scattered wattle shrubs.



771-507-0002 GROVES GAMBLE

This Alpine Ash coupe was logged in mid 2017. The area has failed to regenerate and is now dominated by grasses and bracken.



NEW RUSH CLEARFELL 771-507- 0014

This Alpine Ash coupe was logged in 2011. The area has failed to regenerate and is now dominated by grasses. This coupe has been removed from the TRP but it is unclear when it was removed.



This report has not detailed the full extent of failed regeneration in the Mt Delusion area, it is critically important that DELWP and DJPR investigate to determine the full extent of failed regeneration. This report focusses on seven coupes that were removed from the TRP in 2019, however it appears the practice of removing coupes that have not regenerated has been occurring for some time.

RECOMMENDATIONS:

Based on the evidence provided in this report that VicForests has removed coupes from its TRP that have failed to regenerate and therefore breached the conditions of the Allocation order and the Sustainable Forests (Timber) Act (2014) we make the following recommendations to DELWP and the Department of Job Precincts and Regions (DJPR).

- Prosecute VicForests for breaching conditions of the Allocation order and STF Act.
- Curtail logging in Mc Guinness Creek forest block, Strobridge forest block, East Wentworth forest block, Mt Delusion forest block and all areas of forest above 1000m altitude where failed regeneration appears to be most common.
- Issue a directive to VicForests pursuant to S70 of the Sustainable Forests (Timber) Act to immediately cease logging in the 'Duped' coupe and 'Bucket Mouth' coupe on the basis that any further impacts to the forests caused by operations in those coupes may be permanent due to the legacy of failed regeneration in the Mt. Delusion / Mc Guinness Creek areas.
- Conduct a state-wide audit of failed regeneration within the VicForests 'working forest areas' allocated to VicForests through the Allocation Order and take appropriate regulatory action against VicForests for any breaches relating to failed regeneration and removal of coupes from TRPs.
- Provide a statement of reasons as to why Saturday Lunchtime 771-507-0001, Toms Tk North 771-507-0012, Toms Track 771-507-0013 and Crown 770-507-0001, Paspalum 773-501-0022, Buffalo Grass 773-501-0008 and The Farm 722-504-0005 coupes were removed from the TRP and details of what oversight DJPR / DELWP had over the removals process.

We also make the following recommendations and requests to VicForests:

- Cease logging in the 'Duped' coupe and 'Bucket Mouth' coupe on the basis that any further impacts to those forests caused by operations in those coupes may be permanent due to the legacy of failed regeneration in the Mt. Delusion / Mc Guinness Creek areas.
- Provide a statement of reasons for why the Saturday Lunchtime 771-507-0001, Toms Tk North 771-507-0012, Toms Track 771-507-0013 and Crown 770-507-0001, Paspalum 773-501-0022, Buffalo Grass 773-501-0008 and The Farm 722-504-0005 were removed from the TRP in April 2019.
- Provide a written explanation as to how High Conservation Values such as Greater Gliders, Yellow Bellied Glider, Masked Owl, Powerful Owl and Sooty Owl will be maintained and not threatened in the Bucket mouth and Duped coupes.
- Place a moratorium on all logging in the Mc Guinness Creek forest block, Strobridge forest block, East Wentworth forest block, Mt Delusion forest block until all areas of failed regeneration are successfully regenerated and silviculture and regeneration systems are reformed so they can demonstrably avoid failed regeneration.