

Submission guide for the Code of Practice for Timber Production review.

Include a personalised section:

It's important to *personalise* your submission. Please tell them who *you* are, any stories about your personal connection to the forests, and why you think it's so important to adequately protect them. Read our [example submission](#) here.

Some key points you may want to make (please use your own words for the greatest impact):

- Fires and floods are devastating communities around the globe right now, so we need to make the right choices for the climate (the ash ecosystems of Victoria store more carbon than any other studied forests in the world). I urge you, as the department for the environment, to protect our forests so that they can protect us from climate impacts like mega fires and water insecurity.
- We are yet to fully understand the horrific impacts of the Black Summer bushfires, which accelerated the loss of threatened wildlife and flora. We must take this into account before making any changes to the code.
- A vast majority of Victorians want greater protection of their public forests for recreation and conservation. We are rapidly losing these values to logging and the code changes continue to facilitate this.
- Escalating logging before the transition is not the only, or the appropriate, way to provide workers in the industry security. Investing in ecological agroforestry projects, supporting guaranteed fire management or ecosystem restoration jobs, or redirecting funds from this [heavily subsidised industry](#) for support packages, are just some of the more ethical ways to support workers without trashing our precious forests, which will provide economic and social welfare for all into the future and are worth so much more standing. Expanding logging in our last remaining public native forests threatens all Victorians.
- First Nations custodians have given no free, prior and informed consent for logging on their country, as stated in a letter signed by the [Sovereigns on Forests](#) in 2019. The rightful, traditional custodians of this land should be making self-determined decisions about its management. Any treaty process is tokenistic while First Nations country is being destroyed by clear-fell logging.
- The code is (and always has been) based on the timber industry's definitions, terms and measurements. I urge you instead to consider science-based advice and draw up ecologically sound legislation. Please listen to leading scientists, like Professors David Lindenmayer and Chris Taylor, on the health and management of forests.
- I support the detailed submissions made by forest protection groups such as Rubicon Forest Protection Group, Kinglake Friends of the Forest, Goongerah Environment Centre, Friends of the Leadbeater's Possum, Rubicon-Snobs Ck Recreation Reserve Inc., Wildlife of the Central Highlands, Victorian National Parks Association, Environment East Gippsland, Friends of Mallacoota, B.E.A.M, Gippsland Environment Group Inc., Environment Victoria, and The Wilderness Society and echo their call for an extension of public comment and a revised, much more rigorous consultation process.

Some issues we will be raising that you may want to echo (read the [email from VNPA](#) for a more detailed breakdown):

The MAIN POINT of your submission should be:

28 days is far too short to enable detailed submissions with a full understanding of the proposed changes. Some of these changes are complex and highly technical. Community members need time – especially amidst the upheaval of another COVID lockdown – to properly analyse their impact on our public forests. Please understand that by outlining the preliminary concerns below I don't intend to imply that you can now 'tick the box' and claim that you have consulted the public. You have categorically failed to do so in good faith, by twice refusing environment groups' request to extend consultation (I argue the consultation was insufficient on the following grounds: 1. Failure to publish the report of the 2019 review of the code; 2. Major deregulatory initiative given only 28 days consultation; 3. No itemisation of the proposed changes; no tracked version to enable stakeholders to view changes; 4. No RIS despite major deregulatory initiative).

Additional points

- The changes claim to increase accountability and certainty for conservationists, but instead do the opposite. They weaken the protection of threatened wildlife (the increase in activities allowed in SPZs is unacceptable) by changing prescriptive protections to guidelines.
- The changes compromise the integrity of our ecosystems as a whole, on a landscape scale, by replacing binding protections with aspirational targets.
- There are specific changes to laws which appear to be designed to undermine current community legal cases, which is an attack on the public's ability to hold government entities to account.
- The amendments weaken the regulatory framework in the face of climate change and [increased fire risk](#), before the impact and implications of the 2019-20 fires are made clear (via the Major Events Review).
- The changes appear to constitute a major deregulation of logging, which is inconsistent with a transition out of the native forest industry.
- There are no changes to properly protect mapped and unmapped old growth forest. Protections for big trees are weak and pose a serious threat of misinterpretation.
- The changes dilute already weak recreational and tourism area protections.
- The proposed changes reveal the government's stance on last year's federal court ruling, wherein Justice Mortimer found VicForests had failed to protect the endangered species and had broken a number of clauses in the Code. Government has disregarded this judgement by reverting back to a less recent and relevant, historical ruling to base their decisions on when assessing the risk of irreversible damage to the environment.

Read draft submissions from [Rubicon Forest Protection Group](#), [Kinglake Friends of the Forest](#), [Warburton Environment](#) & [GECO](#).

Submit your submission [HERE](#) & email it to lily.dambrosio@parliament.vic.gov.au directly.