

VicForests' HCV, Code of Practice and other transgressions relating to FSC Controlled Wood Standard (FSC-STD-30-010 v2.0) since audit field inspection in November 2019

Matter for SCS consideration	Details of matter (Note 1)	Status
Att 1. Dismissal of expert advice of Prof. David Lindemayer	Code Cl. 2.2.2.3 requires that <i>the advice of relevant experts and relevant research in conservation biology and flora and fauna management must be considered when planning and conducting timber harvesting operations</i> . VicForests' seemingly out-of-hand dismissal of the advice of Professor Lindenmayer is likely to contravene the Code and if so be illegal.	1
Att 2. Logging of oldgrowth forest in Snobs 13	This attachment is self-explanatory. Despite VicForests promises to the Government and despite the Government's policy of not logging oldgrowth, it has in fact done so as evidenced in this report. (Note 2)	2
Att 3. Failing to prevent serious erosion along road into Gnu	Following DELWP's finding that VicForests had indeed breached the soil protection provision of the Code in a Rubicon coupe 'Rio', which I think you viewed from across the Royston River Valley, it invited VicForests to enter an 'enforceable undertaking' to guard against similar events in the future, but VicForests refused. RFPG has since alleged that VicForests has again neglected its erosion prevention obligations, this time in the coupe Gnu on the northern slopes of Mt Bullfight and along Snobs Creek Road.	2
Att 4. Logging in place of a wildlife corridor	RFPG argued that the logging of the coupe Mongoose was the last opportunity to link the Royston River Special Protection Zone (reserve) with the Leadbeaters possum habitat reserve on top of the Royston Range through an area of mature ash. Our case was referred to the forest regulation unit in DELWP, never to be heard of again, and the coupe was logged as planned.	3
Att 5. Blackberry exacerbation	Where blackberry is present in a closed mature forest it appears as a repressed understorey species, but once the canopy is opened to light and the soil is disturbed, as with logging, it proliferates. This has happened repeatedly throughout the Rubicon State Forest over many years, as RFPG members with a long-term familiarity of the forest can attest. Yet despite VicForests failing to do any roadside spraying in the face of this biodiversity threat that logging exacerbates, THCU claimed that because blackberries were widespread in the RSF, VicForests inaction was permissible!	3
Att 6. Ceasing to provide coupe plans and maps ahead of operations commencing	While we accept that the new process for making coupe plans available is not, in fact, contrary to the Code as DELWP found, it certainly amounts to an act of bad faith on the part of VicForests and is at odds with System Requirements 1.3(d) and 1.3(f) in the FSC Controlled Wood Standard.	3
Att 7. Refusing to remove Chitty Chitty Bang Bang from Timber Release Plan (TRP)	We have opposed the logging of a number of coupes with high visibility from the surrounding settled area, especially the Maroondah Highway. This is one of VicForests' more egregious TRP inclusions and while there seems to be no immediate plans to, we believe any logging of it would be clearly illegal.	4

Matter for SCS consideration	Details of matter (Note 1)	Status
Att 8. Logging of Snobs 13 and Shackle	VicForests proceeded to log two coupes, Shackle and Snobs 13, that they knew were the subject of proposed rezoning to protect them with the logging occurring within the contested area. (Note 2)	4
Att 9. Failure to pay proper regard to RFPG's TRP submission	RFPG submitted a detailed and well-researched submission on the November 2019 TRP proposals, which resulted in only one of more than 100 coupes being removed. While we expected a response that rebutted the details of our claims, we simply got a generic reply, is at odds with System Requirements 1.3(f) in the FSC Controlled Wood Standard	4

THCU Case Status

1. Not a case
2. Open
3. Closed (In the three instances where DELWP did not substantiate our Code breach allegations, our failure to challenge its decision should not be taken as agreeing with the decision. In two of the three cases closed without RFPG challenge (Att 4 and Att 5) we certainly do not agree with the finding)
4. Closed, closure challenged

Notes

1. In each attachment the relevant correspondence is presented in chronological order
2. We accept DELWP's finding that the steepest parts of Snobs 13 are under 30°, however we previously argued to VicForests that in this catchment the slope limit should have been 25°, in line with similar circumstances in the Otway Ranges.