



# Submission by RFPG on Draft Old Growth Forest Field Identification Procedure

## Issue 1: What is negligibly disturbed?

*“Determining whether an area is old growth forest involves evaluating whether there have been significant alterations to the forest structure (ie. the mix of growth stages of the trees and their crown cover) or the species composition in that forest compared to an undisturbed old growth forest in that region.” (Draft OGF ID Guide, p.9)*

But what if the “undisturbed” benchmark does not exist? For example, how can a comparison be made to assess whether an old stand of alpine ash forest is OGF when there is no undisturbed alpine ash forest (or effectively none) left in the Central Highlands? And given that forest structure is naturally dynamic, largely as a result of disturbances, the ecological validity of endeavouring to find an ‘undisturbed’ benchmark is questionable.

This is a crucial problem given that much of what is commonly termed “1939 regrowth” ash forest is in fact now “mature” forest (ie >80 years) and has fully recovered (including understorey strata) - both floristically and structurally, from the impact of the 1939 fires.

To illustrate the extent of the structural recovery, we append some images recently taken in the soon-to-be-logged coupe ‘Snifter’ on the north end of the Blue Range where it is immediately apparent that the upper limb structure of these 81 year old trees is characteristic of the mature, not the regrowth stage. Hollows are visible as are burls on the trunks further confirming its status as mature forest. As to the floristic composition, it is weed-free, diverse and entirely characteristic of EVC 38 (Montane Damp Forest).

The lack of guidance on determining what is ‘negligible’ disturbance, especially where the original disturbance was ‘significant’, as in 1939, but is now ‘negligible’ must be remedied.

## Issue 2: Inadequate structural depictions

Rather than forcing assessors to rely on so-called ‘typical’ forest structure (as in figs 7 and 8), which will not lead to “consistent and repeatable” results as OCR requires, we urge those drafting this document to actually visit some forests and provide a comprehensive photo album of the range of forest structures that fit within the various classes.

## Issue 3: What is the oldest growth stage?

In the seminal *Study of old growth forest in Victoria’s Central Highlands*<sup>1</sup> (on which chapter 13 of the Central Highlands Comprehensive Regional Assessment is based), and which is the source of the OGF definition in the Code, the limits imposed by fire frequency are recognised:

*“It is assumed that, for a particular site and vegetation class, old-growth forests have attained their oldest, naturally achievable growth stage(s) under a contemporary regime of natural disturbance which, in the Central Highlands, is generally fire disclimax.” (p.4)*

In the face of global warming and increasingly frequent mega-fires the question of what constitutes the “oldest growth stage” can no longer be answered by just looking to the past. The future fire disclimax regime for ash may see the ‘senescent’ phase disappear entirely.

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<sup>1</sup> Department of Natural Resources and Environment.1996.Forests Service Technical Report 96-3.

#### **Issue 4: Ash forests >80 years are typically “mature”, not “advanced regrowth”**

The attempt by the draft guide to pretend that forests aged up to 120 years can be generally regarded as “advanced regrowth” (last para p.18) runs counter to all the policy documents on which logging in Victoria (and the Central Highlands in particular) rests.

The Central Highlands Comprehensive Regional Assessment (that still officially underpins the Central Highlands RFA) states (p.43) that:

*“Forests are also classified by age or maturity:*

*Regrowth - 0-60 years of age,*

*Advanced regrowth - 61-80 years,*

*Mature (M) - greater than 80 years, and*

*Overmature (OM) - greater than 120 years, with evidence of senescing crowns.”*

However, the term is used in here in the context of commercial classifications of timber not for the purpose of old growth identification. The term should not be imported and confused with the growth stages correctly set out in Table 2 of the Procedure which are derived from and consistent with Woodgate, Jacobs and the CH Old Growth Study.

Still, the fact that maturity is reached at 80 years is backed up later in the CRA (p252) where unpublished evidence is cited (reported in the Central Highlands old growth study) as follows:

*“Limited investigations were conducted to determine the ages of forest growth stages by using dating techniques on two Mountain Ash trees. Interpretation of data suggested: an ‘immature’ growth stage for Mountain Ash of about 80 years, a ‘mature’ phase of about 270 years, a ‘senescing’ phase of about 100 years, and, finally, a ‘stag’ phase of about 50 years.”*

This apparent attempt to redefine ‘advanced regrowth’ seems designed to give VicForests *carte blanche* to continue to log forests stemming from the 1939 fire without further question. Any reference to the term ‘advanced regrowth’ should be removed from the Field Guide.

#### **Issue 5: Inconsistency of OGF definition with NFPS**

Victoria’s definition of OGF does not distinguish between ‘natural’ and ‘man-made’ disturbance which is at odds with the National Forest Policy Statement which defines OGF as:

*“forest that is ecologically mature and has been subjected to negligible unnatural disturbance such as logging, roading and clearing. The definition focuses on forest in which the upper stratum or overstorey is in the late mature to overmature growth phases.”* (NFPS Glossary p.iii)

The first question to be resolved would therefore seem to be whether Victoria should adopt the national definition, especially since the forthcoming review of the *Code of Practice for Timber Production 2014* provides the appropriate mechanism to consider this issue.

Hence, RFPG argues that the definition of ‘old-growth forest’ be settled as part of the review of the Code, that OCR defer further work on this Guide until the Code review concludes and that in the interim logging of relatively undisturbed, structurally diverse, forest >80 years cease.

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