



The Future of the Rubicon State Forest

Preliminary Submission to Eminent Panel on Community Engagement

Rubicon Forest Protection Group

15 March 2024

1. How we experience the Rubicon State Forest

The forest existed before colonisation, perhaps before first nations people arrived. It has a right to live. We respect the rights of the forest and the rights of the trees, ferns, fungi, birds, mammals, reptiles, insects, and streams who make up the forest.

Anthropocentric rationality and capitalist consumerism have driven extractions from, and discharges to, our natural environment far in excess of its capacity to repair and recycle. Global warming and accelerating loss of biodiversity are critical manifestations of this. The forest, in its awesomeness and its vulnerability, can speak to human society and guide us to a more harmonious relationship with nature.

The forest is a place of deep reflection. Its age, size, complexity, beauty and terror are awe-inspiring. The forest provides places and pathways where we can find peace with ourselves and develop the mindfulness needed to cope with the challenges of being human, including the looming sixth extinction.

In the face of the threats to our environment we reflect upon, and are inspired by, “the ancestral tie between the land, or ‘mother nature’, and the Aboriginal and Torres Strait Islander peoples who were born therefrom, remain attached thereto, and must one day return thither to be united with our ancestors¹.”

The Rubicon Forest is part of our history, at a range of scales. The forest speaks to us of our geological and ecological histories, and the histories of first nations custodianship. It speaks of the brutalities and displacements of colonisation and of the ingenuities and resilience of the people of our region.

We recognise the contribution that native forest logging has made to the development of rural Victoria, to the prosperity of the State, and to its role in building our homes. We salute the intrepid people who comprised the timber communities that lived and worked in sawmilling settlements in the forests of the Central Highlands. We remember the many timber workers who lost their lives in workplace accidents, especially in the first half of last century, and those who perished in the 1939 fires.

People who don't know their history cannot chart their future.

The forests of the Central Highlands (including the Rubicon Forest) are a wonderful resource for people living in Melbourne and beyond. The forest is a temple in which the values of respect and sustainability can be strengthened. The forest is a university (ecology, geomorphology, history, etc) which could be made accessible to people from beyond Murrindindi. The forest is a playground with scope for various recreational uses (eg camping, walking, self-drive tours) which are compatible with repair and protection of the forest.

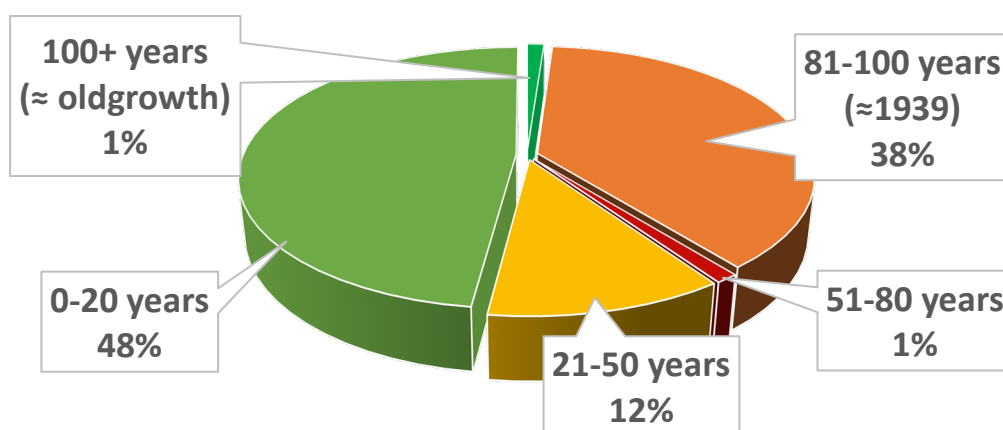
1.From the Uluru Statement from the Heart.

2. Repair and protection

The forest has been degraded (unsustainable logging, failed regeneration, deer infestation, spreading blackberries, loss of biodiversity) and needs a major focus on repair and recovery. We face a warming, drying future which threatens the ecological stability of the ash forests of the Central Highlands and risks the ecosystem services provided by the forest (including water, carbon storage, biodiversity, and recreation).

The VEAC Interim Report acknowledges the skewed age distribution of the ash forests of the Central Highlands (Figs 3.18 & 3.19) but it fails to recognise the deep and abiding ecological harm that logging has done, especially to the ash forests. The following pie chart, drawn from 'decade of origin' data (2019-20) provided by VicForests to RFPG, illustrates how almost half of the ash forests in the Central Highlands are reproductively immature – a huge ecological disability and a long-term survival risk in the face of future megafires.

**Age of ash forests in State Forest in the Central Highlands available for logging prior to cessation
(Total =74,700 ha)**



'Decade of origin' data are not applicable to mixed species forests but we estimate that perhaps half the area of the most productive mixed species forest have been logged in the last 50 years.

We urgently need new investments in ecological restoration, and, in the face of a warmer drier climate, new investments in ecological resilience.

There are important scientific uncertainties and controversies associated with looking after the forest (eg preparing for drier, hotter climate; guidelines for ecological restoration; protocols for fuel reduction burning; and neglected ecological issues, including ferns and fungi). We need new investments in research and innovation, and new platforms for evidence-informed dialogue between different perspectives on the forest's future.

3. Economic opportunities

The Rubicon Forest - temple, university and playground – has much to offer the people of Melbourne, and beyond. What the forest has to offer has not been fully appreciated or communicated. We support investment in developing the tourism offerings of our region, in ways which do not further degrade the values of the forest.

The RFPG has advanced [various proposals](#) for tourist development in the Central Highlands over several years. Recently we have commenced exploring, with AGL, the possibility of converting the Rubicon haulage line and aqueduct tramway into a commercial tourist venture. Our preliminary ideas are set out in the attached draft proposal.

4. Future status and management of the Rubicon Forest

The VEAC Interim Report says of Units 1, 3 & 4 (which includes the Rubicon State Forest):

“A large protected area such as a national park is commensurate with the outstanding natural values of three large areas in the north and south of the RFA area (units 1, 3 and 4 in figure 5.2) and would link the existing Yarra Ranges, Kinglake, Lake Eildon and Baw Baw national parks and the Bunyip, Cathedral Range and Moondarra state parks. There are relatively few uses that would conflict with the national park designation, although this is an area that the EPCE [Eminent Panel for Community Engagement] should explore further with the community during its engagement period. This area encompasses the full range of major forest types and landscapes of the Central Highlands including the wet montane ash forests and rainforests that characterise the region.”

However, the EPCE report on the Mirboo North and Strathbogje IPAs also flags the possibility of new categories of land use, in particular, the idea of a ‘cultural reserve’.

We are not expressing a view about the most appropriate statutory land use category for the Rubicon Forest in its post-logging future. Rather, we hope that, in forming its recommendations regarding the appropriate land use category, the Eminent Panel gives priority to the development of standards of management, and ensuring full accountability of whatever management authority is established.

Standards.

Whatever type of reserve, or reserves, the Panel might recommend, we urge it to also include a recommendation for the development of measurable standards for repair, restoration, and management of the forest and for these to be given statutory authority. Among other aspects of forest management, the standards should provide for the eradication or suppression of blackberries and other invasive weeds; the control of pest animals, including deer, feral cats and foxes, and the rehabilitation of all roads and tracks except for those required for fire management and tourism routes.

The standards, including implementation, monitoring and compliance, should be developed to apply appropriately to different forest type and to forests with different logging histories.

Relevant natural resource management authorities should be involved in the development of draft such standards in consultation with relevant First Nations organisations, forest and environment conservation groups and expert forest scientists and organisations.

In addition to the draft standards, short- and longer-term budget estimates should be prepared (and published), including provision for the development of the necessary workforce. The draft standards, including provisions for implementation monitoring and compliance, and appropriate budget estimates should be subject to appropriate public consultation prior to adoption.

Ecological condition audit

We propose that, as part of developing the standards, an 'ecological condition' audit be undertaken to establish what proportion of coupes are in a poor or very poor ecological condition; what the specific problems in each coupe are and how they might be addressed.

In the first instance, having regard to resource constraints, such an audit could give priority to (a) ash coupes only, (b) to coupes logged since 2004 when VicForests was created, and (c) to coupes (or contiguous logged areas) over 25ha. Those restrictions would bring the coupe count down to around 150. The results of the audit and the scientific review (see below) should enable the standards to fully encompass the objectives of ecological restoration and resilience.

Recognising the role of citizen scientists in the protection of biodiversity in state forests, conservation groups should be invited to help with the audit.

Research and consultation

The development of standards for the management of the forest will confront a number of scientific uncertainties and controversies. Managing such uncertainties and controversies must involve a thorough and comprehensive review of current knowledge by experts whose integrity is widely accepted. Where the

published science does not resolve such uncertainties (regarding forest management practice) the priority should be to commission appropriate research.

It would also be essential to create platforms for ongoing engagement of stakeholders, including the forest conservation sector, regarding the identification of uncertainties and controversies, the assembling of scientific evidence, and the commissioning of appropriate research.

Accountability

The proposed standards should be accompanied by measurable indicators and a monitoring and compliance regime.

Standards will be meaningless without accountability, including the accountability of government for adequate funding of the management authority. Public transparency will be critical in terms of ensuring the necessary rigour of implementation including budget allocations.

The management authority should be required to publish in its annual report the total expenditure on ecological restoration within the forest and progress with implementing the standards, including actions taken during the year and data measuring past progress.

There should be formal provision for the involvement of forest conservation organisations in the direction and accountability of forest management. There should also be provision for forest conservation groups to be involved in helping implement the works required by the system of standards proposed and in gathering the data necessary for measuring their impact.