

## Submission regarding the proposed alterations to the Code of Practice for Timber Production 2007

By

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The Gippsland Environment Group Inc. was formed in 2005 by residents in the Bairnsdale district who were concerned with the on-going decline in the health of the environment. Our goal is to see improved ecosystem management for biodiversity conservation in the area. We hope to achieve this goal by voicing our concerns to land managers, politicians, local council and the general public.

The Gippsland Environment Group strongly objects to the proposed alterations to the Code of Practice for Timber Production, to allow the logging of threatened species habitat. The main reason it is stated *‘forest management planning and all forest operations must comply with measures specified in relevant FFG Action Statements and FFG Guarantee Orders’* is because logging is recognized as a threat of considerable magnitude and is likely to contribute to species decline. Other proposed changes to the Code include to *‘achieve a better balance between the protection of threatened fauna and sustainable timber production from public native forests’* to allow for improved certainty of timber supply. This assumes that the balance is currently in favour of the environment, that current ecosystem condition must be good and that threatened species are resilient enough to absorb further disturbances and the degradation caused by logging. In reality, however, most threatened species have undergone significant declines and continue to decline (primarily caused by inappropriate forest management and existence or promotion of numerous threatening processes), with logging contributing to declines, and overall representing a considerable threatening process to numerous threatened species.

*‘Sustainable timber production’* does not reflect sustainable habitat requirements for threatened species, primarily because numerous threatened species require unlogged forest to survive (e.g. hollow dependant fauna). Conservation measures are not just about preventing extinction by conserving habitat and maintaining viable populations. It assumes that we know what a ‘viable population’ constitutes, and that we are capable of conserving this ‘viable population’ and assumes that conserving habitat alone is adequate to ensure conservation. Overall, this blatantly ignores the importance species have in ecosystem function and that most species are continuing to decline. The concept of sustainability is therefore primarily only an aspirational goal with regard to biodiversity conservation.

### **The fallacy that conserving habitat conserves species**

The proposed changes confidently assume that threatened species can be adequately conserved – primarily by ensuring habitat persists elsewhere (mainly in National Parks). If we have learnt anything about conservation in Australia over the past 200 years, is that habitat protection alone cannot guarantee conservation, primarily because species continue to decline irrespective of

habitat availability (or protection) due to the existence of numerous threatening processes (e.g. feral predators, altered fire regimes). Therefore, conserving habitat alone cannot conserve species (e.g. many terrestrial mammal species are declining - the Smoky Mouse has not been detected for several years in East Gippsland and potentially now could be locally extinct, despite occupying coastal National Parks and conservation reserves).

Some species and communities are well represented within national parks, while others are not. This is especially relevant to naturally uncommon wide-ranging top order predators (e.g. large forest owls and quolls). This is why additional conservation measures are required outside of conservation reserves, and why logging potentially poses a threat. Even the spatial configurations of National Parks and other conservation reserves are currently inadequate and it is essential that they are linked, so species can disperse and spread their genes.

It is also important to recognize that habitat availability does not mean that the habitat is currently occupied by a particular threatened species. This is especially relevant to wide-ranging species where much potential habitat is unoccupied, but it will be used in the future (e.g. spot-tailed quoll, large forest owls, honeyeaters, grey-headed flying fox).

### **What constitutes a viable population?**

Determining the population size required to maintain a 'viable population' of a listed taxa or community (to prevent extinction) is problematic, especially for threatened species. For most of our threatened species we have insufficient ecological information to accurately determine what a viable population constitutes, let alone have an ability to evaluate whether parameters are accurate. For example, for many of our threatened species we still have limited understanding of population size, population trends, breeding biology, habitat requirements, home-range and habitat utilization, breeding success, juvenile survivorship, dispersal distances, breeding age, generation time and other demographic parameters; some of which are essential for evaluating what a viable population constitutes. Even then, it provides limited scope to incorporate major stochastic events such as large scale wildfire which can dramatically reduce a species population (e.g. almost 3 million hectare of forest has been burnt in Victoria in past 9 years – how have species been affected by this?). Even if we were able to estimate what a viable population constitutes, this does not guarantee that they can be conserved. This is because we have a poor understanding of how most threatened species respond to management practices (such as logging and fire), so we have limited capacity to implement conservation management suitable for their long-term persistence. What we do know, is that for most threatened species logging is considered a threatening process because crucial habitat is altered both structurally and compositionally long-term, and in many cases irreversibly. It has been recognized that for some species, prohibitively large monitoring programs would be required to obtain sufficient data of important ecological parameters for accurately evaluating population viability.

A good example is the conservation of the Powerful Owl (very similar scenario exists for Sooty Owls and Masked Owls). It has been considered that 500 pairs are sufficient as a minimum viable population in Victoria. Yet many of the parameters which this is based are poorly understood i.e. breeding success, dispersal distance, breeding age, average life expectancy etc. It

is considered that 500 Powerful Owl Management Areas (Special Protection Zones) of 500-800ha in size is sufficient to conserve enough habitat for a viable population. In reality however, much of their habitat (3 million ha) has been burnt in the past 9 years, breeding success has been very low due to drought and reduced prey availability, and populations have crashed (even in unburnt areas). What is their current population? We have no idea – primarily because adequate surveys have not been conducted to ascertain this information. Can we be confident that there are 500 pairs persisting in Victoria at the moment? No we can't, and there is a strong probability there is not. Yet despite these unknowns, important habitat is continuing to be logged – with no understanding of the impact it is having on the owl population. We do know that Powerful Owls are adversely affected by logging, due to dramatic declines in hollow-bearing trees which they and their main prey species require. Is 500 or 800ha of unlogged forest sufficient habitat for a breeding pair of owls long-term? This almost certainly is not. Of the few Powerful Owls that have been radio-tracked, studies reveal home-ranges are in the order of 1000-4500ha short-term, approximately 2-9 times larger than the amount of habitat reserved for a single pair long-term. This also highlights that the adequacy of conservation measures outlined in species Action Statements are often poorly understood, as they are often based on assumption (due to limited or no data) and there has either been limited or no research to ascertain the effectiveness of such measures.

### **Action statements do not guarantee effective conservation**

Action statements typically outline knowledge gaps and important areas of focus for future research as well as ways to improve the species long-term conservation. Unfortunately, this is virtually a 'wish list' or recommendations which rarely if ever are conducted on the scale actually required. It will not guarantee, as the 'proposed variations to the Code' document specifies, that recommendations '*...will be done in the future*'. It should also be noted that the Action Statements for many threatened species have not yet been written. Also, the optimal conservation management strategy for many species often cannot be implemented fully, primarily because such strategies conflict with management for other forest values (e.g. forestry, inappropriate burning). This will often result in a compromise, but the effectiveness of the compromise solution typically remain poorly understood or unknown (e.g. the spatial size of species specific special protection zones or management areas).

### **Conclusion**

Overall, there is no positive outcome for threatened species under the new proposals for legislation change to the Code – except that due to the 'significant new investment in enhancing our knowledge of threatened species' we may improve our ecological understanding of some species, but this information must be used to improve conservation management decisions (rather than being ignored if they are inconvenient – which often happens).

We fear that proposed changes will be flouted, misused for political or financial purposes, and overall, will result in considerable ecological harm.