



8 October 2007

Director
Victorian Environmental Assessment Council
Level 6/8 Nicholson Street
East Melbourne Vic 3004

By Fax: (03) 9637 8024

Dear Director

River Red Gum Submission

Lawyers for Forests Inc. (“LFF”) welcomes the Victorian Environment Assessment Council’s (“VEAC”) River Red Gum Forests Investigation Draft Proposal Paper (“**Draft Proposal Paper**”), which highlights the serious and urgent environmental problem of the health of River Red Gum forests along the Murray River in Victoria.

However, LFF believes that VEAC should go further so as to protect more of the significant River Red Gum forests in the Gunbower area, and to commit to phasing out logging of all Victorian River Red Gum forests by 2015.

Current Proposal

LFF strongly supports VEAC’s recommendation in the Draft Proposal Paper for the creation of an extra 100,000 hectares of National Parks and reserves for River Red Gum forests, including a new Barmah National Park, a new Lower Goulburn River National Park, and a new Warby Ranges-Ovens River National Park.

LFF further supports VEAC’s initiatives to protect the River Red Gum areas from stock grazing, and for the allocation of 4000 GL of water for Victorian floodplain forests, so as to give these wetlands and the threatened and endangered species which it supports the best chance of survival.

Gunbower Island

However, LFF is concerned that the Draft Proposal Paper provides insufficient protection for the River Red Gum forests on Gunbower Island. The current Draft Proposal Paper leaves 70% of this internationally significant area vulnerable and open to logging.

The River Red Gum forests and wetlands of Gunbower Island is listed as a Wetland of international significance under the Ramsar Convention to which Australia is a party, making it subject to the operation of the *Environment Protection Biodiversity*

Conservation Act 1999 (Cth). The area is also listed on the Register of the National Estate and the Directory of Important Wetlands in Australia, and is home to more than 210 species of native flora and 143 of native fauna, several of which have been listed as protected species under the *Environment Protection Biodiversity and Conservation Act 1999 (Cth)*. The River Red Gum Grassy Woodland ecological community which occurs in the Gunbower forests has also been listed under Schedule 2 of the *Flora and Fauna Guarantee Act 1988 (Vic)*.

LFF submits that more protection of this environmentally significant area is required than what is afforded in the Draft Proposal Paper. VEAC's proposal should be amended to recommend an immediate increased protection of the Gunbower area from logging, with a complete phasing out of logging of all public River Red Gums by 2015.

Logging of other Red Gum forests

LFF further submits that the Draft Proposal Paper should be amended so as to recommend to the State Government a rapid phasing out of all logging in River Red Gum forests. Whilst LFF commends the proposal for a 70% reduction of logging of public red gum wetlands, the Draft Proposal Paper as it stands still allows for the logging of 10,000 hectares of significant and severally stressed areas of public forest.

As VEAC is aware, over 60% of vegetation in the overall Murray River wetlands area has been cleared since European settlement. What is left of these forests is crucial habitat for many endangered and listed species which are at risk from logging operations.

Further, findings by VEAC show that the River Red Gum forests have, more recently, been over-logged in an unsustainable manner. Recent figures provided by the Department of Sustainability and Environment show that due to lack of growth rates of River Red Gum forests, which stems from lack of flooding, these forests have been logged at a rate that is 60% higher than what is sustainable.

Logging of River Red Gums must be phased out quickly, and in any event by 2015. The Draft Proposal Paper should be amended to recommend a robust commitment to the rehabilitation of this significant and stressed area of forest, and increasing numbers of endangered species by phasing out any further logging of River Red Gum forests, with appropriate support to affected communities.

Conclusion

LFF supports VEAC's recommendations for the creation of new and larger National Parks and Reserves, as well as other measures to assist the rehabilitation and protection of River Red Gum forests along the Murray River. LFF submits, however, that VEAC should recommend to the State Government a complete and rapid phasing out of all logging of River Red Gums, particularly in the internationally significant area of Gunbower Island, where under the Draft Proposal Paper, 70% of the forest is still exposed to logging.

If VEAC have any questions regarding this submission, or seek further submissions from LFF, please contact Vanessa Bleyer on the number listed below. LFF otherwise thanks VEAC for considering the matters LFF have raised, and looks forward to hearing from VEAC shortly.

Yours faithfully,

A handwritten signature in cursive script, appearing to read 'Vanessa Bleyer', followed by a small flourish.

Vanessa Bleyer
President
Lawyers for Forests
on behalf of the Executive Committee of Lawyers for Forests Inc
vanessab@lawyersforforests.asn.au