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Foreword

The Independent Panel for the West Victoria Regional Forest Agreement (RFA) public consultation was established in January 2000 by the Victorian Minister for Environment and Conservation, the Hon Sherryl Garbutt MP. The Panel comprised myself as the Chair, Mr John Henshall, and Mrs Alison Teese.

Our terms of reference established a clear listening brief and a responsibility to provide the Joint Commonwealth / Victorian RFA Steering Committee with a concise report of the key issues raised in the submissions and public hearings which the RFA will need to address.

This report identifies, categorises and details the range of issues that were raised during the public consultation process. Public debate on the issues raised during this period was quite polarised. We have tried to accurately capture and fairly reflect the range of issues raised during the public consultation period so as to produce a balanced report.

I am pleased to present this report to the Joint Commonwealth / Victoria RFA Steering Committee on behalf of the Panel for its consideration on the public submissions and their implications for the West Victoria RFA.

Christine Forster

Chair

West Independent Panel

March 2000

Executive Summary

This report has been prepared by the Independent Panel for the West Victoria Regional Forest Agreement (RFA) public consultation process to provide the Joint Commonwealth / Victorian RFA Steering Committee (RFA-SC) with an outline of issues raised in public submissions during the process.

The Independent Panel was established in January 2000 by the Victorian Minister for Environment and Conservation, the Hon Sherryl Garbutt MP. The terms of reference of the panel established a clear listening brief and a responsibility to advise the RFA-SC of the key issues raised in the submissions and public hearings which the RFA will need to address. The West Victoria RFA is scheduled for completion by 31 March 2000.

The public consultation process occurred from 17 January to 3 March 2000. Following the 25 February closing date for submissions on the Consultation Paper, public meetings were held across the West Victoria region from 28 February to 3 March 2000. A total of 990 written submissions based on the Consultation Paper were received from individuals and various organisations, and 78 people presented their submissions at public panel hearings.

In broad terms there are three identifiable stakeholder groups in the submissions presented to the Independent Panel:

- (1) those holding views that support “industry” and the continuation of forest harvesting;
- (2) those holding views that support environmental “conservation” and biodiversity; and
- (3) those who see outcomes from the RFA process that mutually support both (1) and (2).

This Report identifies, categorises and details the range of issues that were raised during the public consultation process from these broad stakeholder groups. Certain issues encompass more than one category. These issues can be broadly categorised as follows:

- Conservation;
- Water Catchment Management;
- Forest Industry / Opportunities;
- Other Forest Uses;
- Scenic, Recreation, and Tourism;
- Cultural values of Aboriginal groups;
- Social;
- Economic Impacts; and
- West Victoria RFA Consultation Process and Paper.

1. Introduction

This report has been prepared by the Independent Panel for the West Victoria Regional Forest Agreement (RFA) public consultation process to provide the Joint Commonwealth / Victorian RFA Steering Committee (RFA-SC) with an outline of issues raised in public submissions during the process.¹ The role of the RFA-SC is to manage the development and completion of the RFAs in Victoria, and to ensure that the processes associated with the development of RFAs are consistent with the Scoping Agreement signed in 1996.²

It should be noted that copies of each written submission, including maps, are presented to the RFA-SC as attached documents to this report. For the purposes of this report highly detailed representation of identified comments and proposals cannot be included in this document. To this end, the Independent Panel refers the RFA-SC to these submissions as detailed references to consider in its deliberations.

The issues presented in this report are based on those identified in the written submissions and during the panel hearing process and do not necessarily reflect any view or position of the Panel members. Certain issues encompass more than one category and overlap in discussion occurs for some issues where the Panel considered it appropriate.

The issues raised in the public consultation period are presented in this report as follows:

- Section Two identifies the **range** of issues raised during the public consultation process, broadly classifying them into key issues and sub-categories;
- Section Three outlines the **key** issues raised in the public consultation process that the Panel considers the RFA will need to address; and
- Section Four **details** and expands on the issues identified in Sections Two and Three.

1.1 Background

The Victorian Minister for Environment and Conservation, the Hon Sherryl Garbutt MP, released a major policy statement in December 1999 entitled, *A New Framework for Sustainable Forest Management in Victoria*.

The statement establishes revised processes for the preparation of RFAs and some longer term initiatives to enable a sustainable future for native forests, and to ensure that all community stakeholders are heard by government in deciding that future.

The two remaining RFAs for Victoria, to be completed by 31 March 2000, will cover Gippsland and West Victoria. A key element of the revised RFA process was the introduction of Independent Panels to review public submissions in response to the published Consultation Paper developed by

¹ “Regional Forest Agreements are commitments made by the State and Commonwealth Governments to forest conservation, forest use and development, and the development of those industries based on the resources of the region’s forests” (ref. p. i, Consultation Paper).

² The Scoping Agreement for Victorian Regional Forest Agreements between the Commonwealth of Australia and the State of Victoria was signed in 1996. The agreement sets out administrative and operational arrangements for undertaking Comprehensive Regional Assessments and developing RFAs, as well as committing both Governments to establishing processes and timetables for the completion of the RFA process.

the RFA-SC. The Consultation Paper outlines a proposal for forest use and management in the West Victoria region, and provides a basis for public comment and input on the development of the West Victoria RFA.

The Victorian and Commonwealth Governments welcomed the establishment of the Independent Panels and approved the following terms of reference for the Panels:

1. To review all written public submissions received regarding the West region Consultation Paper.
2. To conduct public hearings in the region and in Melbourne which provide the opportunity for all submitters who asked to be heard in respect of their submissions to do so.
3. To conduct the public hearings in such a way as to provide submitters with a fair hearing and to allow all views to be properly aired consistent with a requirement to contain discussion to matters of genuine relevance to the West Regional Forest Agreement (or contents of the Consultation Paper).
4. To consider the issues raised in the public submissions and provide a concise written report to the RFA Steering Committee, outlining:
 - the range of issues identified in submissions, arranged into logical categories;
 - the key issues raised in the submissions which the RFA will need to address; and
 - the names of the individuals and organisations who made submissions and including as an attachment, copies in full of all written public submissions.

The terms of reference also noted that the Chairs of each Panel become ex officio members of the RFA-SC during its deliberations on the public submissions and their implications for the West Victoria or Gippsland RFA. This arrangement is to ensure that the RFA-SC has a direct linkage to the consultation processes of the Panels.

It is not the role of the Panel or the Chair to provide recommendations to the RFA-SC on the contents of the West Victoria RFA. The role of the Panel and Chair is to be strong “representors” of views formally received during the course of the public consultation period, and to ensure that these are adequately presented to inform the deliberations of the RFA-SC.

The West Independent Panel comprises Mrs Christine Forster (Chair), Mr John Henshall, and Mrs Alison Teese. Appendix One provides brief career biographical details of the West Independent Panel members. Ms Kathleen Murray, Senior Project Officer with the Department of Natural Resources and Environment, provided Executive Officer support for the Panel.

1.2 Public Consultation Process

The public consultation process occurred from 17 January to 3 March 2000, with the Consultation Paper available for public comment until 25 February.

Written submissions were invited on the Consultation Paper, noting that they may include:

- any issues of substance that have not been considered;
- other issues associated with the information presented; and

- views on the approach that should be adopted within the RFA and the implications of that approach.³

Following the closing date for submissions on the Consultation Paper, public meetings were held in Portland and Hamilton on 28 February, Woodend on 29 February, Colac on 29 February and 2 March, Ballarat on 1 March, Geelong on 2 and 3 March, and Melbourne on 3 March.

A total of 990 submissions based on the Consultation Paper were received from individuals and various organisations. Seventy-eight people presented their submissions at public Panel hearings. In addition, approximately 40 submissions based on the Consultation Paper were received stamp marked after February 25, the closing date for public consultation. The Panel has read these late submissions, but they are not listed in Appendix Two. (Appendix Two provides a list of the names of individuals / organisations who made submissions.)

Attachment One provides full copies of written public submissions (presented to the RFA-SC as separate documents).

In broad terms there are three identifiable stakeholder groups in the submissions presented to the Independent Panel:

- (1) those holding views that support “industry” and the continuation of forest harvesting;
- (2) those holding views that support environmental “conservation” and biodiversity; and
- (3) those who see outcomes from the RFA process that mutually support both (1) and (2).

The Panel observed that almost all of the submissions were in support of either Group (1) Industry-related, or Group (2) Conservation-related. While there may be limitations in reducing submissions to one of two stakeholder interest groups (ie, ‘industry’ or ‘conservation’), this approach assists in the identification of viewpoints, and is based on the observation that, indeed, submitters generally fell into one or other of these two groups. Moreover, those taking the middle-ground (ie, those who could see mutually beneficial outcomes for both industry and forest conservation) also raised viewpoints that can be identified in these two broad categories. Public debate on these issues was quite polarised.

³ Ref. Consultation Paper, p. ii.

2. Range of issues identified during public consultation

This section of the report identifies the range of issues raised during the public consultation process, broadly classifying them into key and sub-categories, as per Table One.

Table One: This table identifies the range of issues identified in written submissions and during public consultation based on the observations of the Independent Panel.

Key Category	Sub-Category
Conservation	<ul style="list-style-type: none"> • General; • Portland and Horsham FMAs; • Midlands FMA; and • Otway FMA.
Water Catchment Management	<ul style="list-style-type: none"> • Water yield and water quality.
Forest Industry / Opportunities	<ul style="list-style-type: none"> • Timber Resource Availability / Sustainable Yield Estimates; • Job Losses and Industry Restructuring; • Ecologically Sustainable Forest Management; and • Industry Development Opportunities.
Other Forest Uses	<ul style="list-style-type: none"> • Firewood and Post Industry; • Apiary Industry; and • Mining Industry.
Scenic Recreation and Tourism	<ul style="list-style-type: none"> • Landscape Integrity; and • Tourism.
Cultural values of Aboriginal groups	
Social	<ul style="list-style-type: none"> • Heritage Values; • Safety issues; • Social damage through job losses; and • The Social Assessment Report.
Economic Impacts	<ul style="list-style-type: none"> • Broad comments on the economic analysis; • A summary of viewpoints on likely economic and related impacts concerning: <ul style="list-style-type: none"> – Forest Activity/Processes; – Employment and the Multiplier Effect; – Value-adding; – Industry re-location; – Impact on Small Towns and Unemployment; – Impact on Councils; – Tourism role and potential; – Firewood Collection; – Role of Plantations; – Need for Certainty; and – Forest Industry Restructure Packages.
West Victoria RFA Consultation Process and Paper	<ul style="list-style-type: none"> • Timeframe; • Information Availability; • Implementation of RFA Consultation Process; • Social Assessment Report; • The role of both Governments in the process; and • Community suggestions to improve future consultation processes.

Note that the issues presented in this report are based on those identified in the written submissions and during the hearing process and do not necessarily reflect any view or position of the Panel members.

3. Key issues raised which the RFA will need to address

This section outlines the key issues raised in the public consultation process that the Panel considers the RFA will need to address.

Viewpoints are summarised into eight categories as follows:

- Conservation;
- Water Catchment Management;
- Forest Industry / Opportunities;
- Other Forest Uses;
- Scenic, Recreation and Tourism;
- Cultural values of Aboriginal groups;
- Social; and
- Economic Impacts.

Comments on the West Victoria RFA consultation process and paper are detailed in Section Four.

3.1 Conservation

The public consultation process highlighted that there is very strong concern for a range of environmental and conservation issues in relation to timber harvesting activities.⁴ Diverse comments ranging from general issues to quite discreet and specific comments on the proposed reserves were received. For example some submissions called for the total cessation of all logging activities, that government should declare a total moratorium on logging until further studies are conducted, and that Ecological Vegetation Classes (EVCs) should receive 100% protection. Other submissions made specific comments on certain aspects of the draft Comprehensive, Adequate and Representative (CAR) reserve system and provided suggestions or options to review the current draft system.

Key concerns and comments about conservation issues in West Victoria are outlined below. Note that proposals about issues in specific Forest Management Areas (FMAs) are detailed in Section 4.1.

- Government should adopt the “Precautionary Principle” in relation to forest management.⁵ The precautionary approach must be taken regarding logging in water catchments, with increased forest buffer strips provided and research undertaken.
- JANIS criteria should preserve 15% of the best environmental areas, not solely 15% to enable further wood harvesting.
- Thirty four EVCs (and mosaics) are inadequately reserved. These are largely the grassy and herb-rich EVCs that have been extremely depleted, mainly through clearing for agriculture. The

⁴ It should be noted that whilst the term ‘conservation’ encompasses a range of values, issues raised in this report primarily relate to biodiversity values.

⁵ The “Precautionary Principle” involves evaluation of management options to avoid, wherever practicable, serious or irreversible damage to the environment, and an assessment of the risk weighted consequences of various options.

reservation examples of rare, endangered and vulnerable EVCs on currently unreserved public land will not always be adequate to meet the JANIS criteria. This is due to those EVCs having a large proportion of their distribution on private land and / or their level of depletion since settlement.

- The major conservation objective of the Action Statement for the Spot Tailed (Tiger) Quoll, that the Otway and south west populations have at least 300 adults, appears not to be met in the draft CAR reservations of the Consultation Paper.
- Habitat protection, particularly of hollow bearing trees, is critical to vulnerable bird species, such as the Red Tailed Black Cockatoo and the Powerful Owl, and to fauna, such as the Yellow Bellied Glider and Tiger Quoll. The Panel observed that a key feature of the West Victoria region is the lack of Old Growth forest and hence hollow bearing trees.
- Review how the Code of Forest Practices for Timber Production impacts on biodiversity.
- The conservation of biodiversity is fundamental to demonstrating an ecologically sustainable forest industry.
- Reserves must be large, undisturbed, buffered and linked by substantial corridors in order to maintain biodiversity and prevent localised extinctions.
- The proposed CAR reserve system of 168 000 hectares should have a guaranteed tenure status.

3.2 Water Catchment Management

The consultation process highlighted that there are significant public concerns about the impacts of logging and clear felling practices on the quality and quantity of domestic and commercial water supplies. Whilst water catchment issues were raised generally across the entire West Victoria region, many submissions strongly noted that logging and clearfelling in catchment areas are considered to be endangering the Otway / Geelong / Warrnambool region water supply. Submissions commented that the Western District is totally dependent on the availability of potable water and that logging activities should cease or be minimised to maintain water quality and quantity.

Specific comments referred to a number of Otways water catchment areas which supply Geelong and Warrnambool, including West Barham River Catchment area, the Cumberland, Wye, Kennett, and St Georges River. It was also noted that logging is apparently occurring in a number of these catchments, for example the Upper Barwon, Gellibrand, and South Otways.

Converse to the above, industry-related sources expressed a viewpoint that forestry activity in the Otways was not leading to any environmental damage to the water supply, and that indeed water quality is more than adequately protected by prescriptions under the Code of Forest Practices for Timber Production. It was argued that the scale at which water quantity may be affected by the conversion of mature forest to regrowth takes place under existing forest management practices and makes an undetectable impact on water supply. The issue of water quality needs to be considered relative to long-term meteorological cycles such as drought.

The key proposals raised concerning water catchment issues are for State Government to:

- Undertake hydrological research on water yield to investigate all surface and groundwater systems, having regard to an economic comparison between timber, water, tourism, and social values; and
- Implement and upgrade the Code of Forest Practices for Timber Production (Code) to effectively protect water quality. This includes conducting periodic and transparent audits of Code compliance and public reporting by a body independent of the Department of Natural Resources and Environment (DNRE), to ensure that water quality is not compromised. Stricter protection measures are required in the upper reaches of headwaters.

3.3 Forest Industry / Opportunities

A significant number of submissions were highly critical of the proposed 40% increase to the draft CAR reserve system and cutback to sawlog allocation, noting the implications of job losses for the timber industry and downstream regional economic damage.

The Consultation Paper was considered by many to be biased towards environmental outcomes, and that the adoption of the proposed Timber Resource Availability (TRA) estimates and extensions to conservation reserves would severely reduce the availability of sawlogs and result in job losses. It was also suggested that the Consultation Paper failed to indicate the future security of tenure for the proposed quota levels.

Submissions pointed to the previous indicators provided which suggested that only a modest reduction in resource would occur and were critical of the unexpected change in figures. It was suggested that the proposed pro rata reductions in the baseline TRAs would result in: scaled back operations; employee number reductions; difficulty in amortising recent investments; and slow the creation of new job opportunities.

The significant investment by industry in plant and equipment based on the Timber Industry Strategy and other previous government policies was also highlighted. It was argued that investor confidence would be undermined by the proposed resource allocation cuts, as well as the industry's credibility in interstate and export markets. It was proposed that any future risks associated with new investment in the industry requires the maintenance of a stable policy environment in all levels of government.

Key issues concerning the timber industry are set out below.

3.3.1 Timber Resource Availability / Sustainable Yield Estimates

- Revise the data and figures for the TRA analyses and sustainable yield. Explore options to rectify the sustainable yield deficiencies that were in the Consultation Paper and include Code restrictions in reservation calculations. It was commented that an accurate total increment of all available forest must include the higher annual increment on all the age classes and the areas currently excluded from the area statements.
- Redesign the draft CAR reserve system to meet JANIS criteria by including private land. Modify the CAR reserves by moving boundaries and deferring reserves until alternative supplies come on line. Preserve greater access to commercial forest types through a more flexible approach to reserve design.
- Redefine the boundaries for Special Protection Zones (SPZs). Modify the 40 metre buffer strip to 20m buffer and 20m harvesting strips.

Note that the issues presented in this report are based on those identified in the written submissions and during the hearing process and do not necessarily reflect any view or position of the Panel members.

3.3.2 Job Losses and Industry Restructuring

- Whilst many submissions supported a “no jobs loss” scenario for the West Victoria RFA process and rejected any other outcome, several submissions commented that should job losses result from this process then these should be awarded with adequate compensation and industry restructuring packages.
- The RFA process needs to provide adequate compensation or restructuring packages, endorsed by industry, that allow the industry to restructure to facilitate a full lateral processing / recovery system based on the available resource.
- It was commented that current payouts are based on the average profit of the past three years trading, but that a number of firms have invested heavily in value-adding technologies during that period and are only now making a profit. Any payout therefore based on the existing scheme would undervalue the firm.
- Increase Forest Industry Structural Adjustment Package (FISAP) allocations to support necessary compensation and provide assistance to those who are indirectly affected.
- Where practicable, timber mills should be redirected to the plantation estate and small private operators given assistance to restructure. Industry adjustment includes plantation timber and selective logging and milling of high-grade sawlog timbers.
- The adoption of current proposals and reduction in sawlog entitlements would have damaging direct and indirect impacts on employment supported by forest industries.
- The Panel observed that approximately 405 jobs were identified in mills and processors. These jobs possibly support another 1 200 or more positions through the application of a multiplier.⁶

3.3.3 Ecologically Sustainable Forest Management

- Improve wood production. Options include: overwood removal; thinning of regrowth forests; semi-commercial trial of fertilisation over 2000 ha; defer expansion of the reserve base and treatment of coppice regrowth to favour seedling regrowth.
- Include forest management activities such as thinning and plantations to improve the future resource base.
- Review and revise the Timber Industry Strategy and the Code of Forest Practices for Timber Production at a local level in conjunction with other regulations, and establish an industry ombudsman.
- Invest in agroforestry for farmers to improve grazing land and salinity to alleviate pressure on forests, and further encourage the establishment of private plantations.
- Recommence the Silvicultural System Project.
- Develop licence arrangements for woodchips as for sawlog production.

⁶ Employment multiplier for forest activity and downstream production ranges from 2.5 to 4 or even 6.

- Embody environmental performance reporting in the RFA to a level comparable to the ISO 14001 Quality Environment Standards.

3.3.4 Industry Development Opportunities

- Develop new hardwood sawlog plantations in conjunction with native forest resources, and implement a supporting strategy to build on the existing skill base and infrastructure of the industry.

3.4 Other Forest Uses

Submissions about the implications of the draft CAR reserve system regarding other forest uses were made, namely from the firewood and post, apiary, and mining industries.

These three stakeholder groups called for ongoing levels of current forest access and use to enable their respective industries / activities to continue unimpeded should the draft CAR reserve system proposals be adopted. Concerns about the potential impact that the implementation of the draft reserve system would have on the firewood and post industry in terms of job losses were expressed. Key comments for each group follow.

3.4.1 Firewood and Post Industry

- Support the continuation of wood collection, primarily in the Dunworthy Common Area.
- Develop a firewood strategy, and zone Dunworthy Forest as Special Management Zone (SMZ) not Special Protection Zone (SPZ), and keep it open for low-impact firewood collection.
- Support the continued use of Red Gum in the Horsham FMA; the use of Glynwlln Forest, and Central Wimmera, along Henty Highway; and the use of Illawarra and Rocklands as important sources of forest products for Stawell and Balmoral respectively.

3.4.2 Apiary Industry

- Maintain current levels of access to forests and include bee sites in Forest Management Plans.

3.4.3 Mining Industry

- Do not exclude minerals exploration or mining from the block numbers identified in the Consultation Paper as Reserve Areas of high prospectivity within the category of “additions to the Conservation Parks and Reserves” (refer to Section 4.4.3 for list of blocks).

3.5 Scenic, Recreation and Tourism

The public consultation period revealed a strong, broad view that the RFA process and Consultation Paper gives limited recognition to the economic values of scenic, recreation, and tourism issues, and further that the protection of forests from logging activity will greatly enhance regional tourism. The relationship between current and potential tourism development and the possible detrimental impacts of timber harvesting on these activities was consistently raised across the West Victoria region. The Otway region did however draw the most response and attention from the public concerning these issues.

Several submissions also noted that tourism and timber harvesting co-exist and commented positively that forest values and harvesting practices make a significant contribution to a majority of tourist based activities. For example, access to tourism is reliant on funds provided for roading through sawlog royalties and municipal rates, and that tourism potential in the history of wood extraction exists.

Key comments regarding these issues are as follows:

- Address specific scenic, recreation and tourism issues and their relationship to land use allocations, the timber industry, catchment management and socio-economic factors in West Victoria.
- Consider using Recreation Opportunity Spectrum and Visual Management System tools in the determination of land use allocations and management principles as part of the RFA process.⁷
- Reconsider the land use allocation and activities of the section of State Forest located in the area bounded by Turtons Track, Seaview Creek, the Forrest - Apollo Bay Road, Wild Dog Creek Road and the southern boundary of the State Forest. (It was noted that the Otways region has the highest number of waterfalls in Victoria.) Areas to consider include portions of the following stream catchments:
 - Seaview Creek;
 - Falls Creek;
 - East Branch Barham River;
 - Wild Dog Creek; and
 - Smythe Creek.
- Extend Lorne Angahook State Park.
- Conduct a State Government commissioned feasibility study into the potential of the tourism industry in West Victoria, focussing on the Otways area. This would include investigation of the possibilities for the Trans-Otway walking track and the extension of National Park systems.
- Develop and promote the Great South West Walk in the Portland FMA.

⁷ It was submitted that significant attention to scenic and recreation resources of Victoria's State Forests was once provided through the Visual Management System and the Recreation Opportunity Spectrum planning mechanisms and that they should be reintroduced for use in the RFA process.

3.6 Cultural values of Aboriginal groups

Some submitters noted that Aboriginal people were highly offended by the late insertion of the addendum on indigenous issues in the Consultation Paper. This poor recognition of cultural values of Aboriginal groups and proper indigenous representation in the RFA consultation process was critically commented on by a large number of submissions. Further comments included that Aboriginal people should have major input into decisions regarding their land, and that the RFA process should have greater emphasis on Native Title issues and Aboriginal land management practices.

Two members of the Independent Panel attended a special meeting on 6 March, at Brambuk near Halls Gap, convened by the Regional Coordinator for the South West and Wimmera Cultural Heritage Program. This meeting followed a workshop on the West RFA Consultation Paper. The Panel was presented with a summary of that workshop and the following issues were identified:

- Aboriginal people should be represented as the highest level in the RFA process. Any implementation of the RFA should include an Aboriginal representative in policy and funding bodies (bringing Aboriginal Affairs Victoria and DNRE under the one Minister would help to facilitate this).
- Site location confidentiality must be respected and liaison with local communities needs to be established to deal with individual sites – possibly through Wood Utilisation Plans.
- Aboriginal people should be employed throughout the forest and parks management industry with a view to developing co-management arrangements. This employment should be on a secure career basis.
- All operating protocols should be reviewed to ensure that Aboriginal people are properly consulted – suitable protocols include those in Housing and Cultural Heritage programs.
- Other issues were canvassed including forestry, other forest uses, and cultural heritage. These issues need to be progressed with individual communities through a more detailed consultation process.

3.7 Social

The social issues raised in the public consultation process are broadly categorised as: heritage values; safety issues; damage through job losses; and the Social Assessment Report (see Section 4.6 for comments on the latter). Key comments raised regarding these issues are provided below.

3.7.1 Heritage Values

- The RFA must be consistent with Commonwealth Environmental and Heritage obligations and commitments and the Commonwealth's existing powers should not be relinquished.
- Forest management processes should incorporate performance monitoring and reporting with respect to cultural heritage values, and archaeological surveys in all potential logging coupes should be undertaken.

3.7.2 Safety issues

- Areas such as Turtons Track should be closed to logging vehicles to allow safe access and passage for recreational purposes.

3.7.3 Social damage through job losses

- Major regional social damage through job losses in the timber industry is forecast should the proposed TRA allocations and draft CAR reserve system be adopted.
- Money that currently subsidises the logging industry should be used to assist ex-timber workers to find alternative employment in the expanding dairy, meat and tourism industries.
- State and local government should have key roles in developing alternatives to native forest industries, such as farm forestry, and other employment opportunities, for example through tourism related traineeships.

3.8 Economic Impacts

The economic analyses presented in the Consultation Paper drew strong comment and criticism from a significant number of submissions. A brief summary of these issues follows.

3.8.1 Economic analysis of all forest values

There was strong criticism about the lack of analysis for non-timber values, downstream industries, and full economic / social analysis - including social, heritage, biodiversity, tourism, water, and associated walking, photography, bird-watching, flora and fauna observation, cycling and camping values.

3.8.2 Lack of transparency in economics - losses / debts / royalties

Many submissions highly criticised the State Government's timber industry subsidisation programs, noting that the industry struggles to make a profit for the public. Several submissions called for a report to detail subsidies to industry, which identifies non-timber values compared with timber values, and determines how each might affect employment numbers across a range of industries. There was also a strong call for the State Government to raise royalties to reflect the true value of the timber industry and to cover related infrastructure and administration costs.⁸

3.8.3 Data Integrity

The basis for, and determination of, the recalculation for the TRA was questioned repeatedly. Strong views were expressed that the Consultation Paper and process failed to provide appropriate economic analyses, having regard to value-adding, plantations, opportunity costs, current industry investments, etc. A number of submissions also commented that the Consultation Paper failed to adequately address the flow on effect of reductions in employment and the potential socioeconomic impacts on the affected regions. (For example,

⁸ Many submissions quoted the Victorian Auditor-General's Office Special Report Timber Industry Strategy, May 1993, and the Victorian Auditor-General's Office Report, part 3.5 DNRE, May 1997.

the true value of timber production should not be measured at the mill gate, i.e. benefits in the furniture manufacture and retail sectors must be considered.)

Table Two (Section 4.7) expands on a number of the issues raised concerning likely economic impacts. These issues are summarised into eleven topic categories identified for each of the two broad stakeholder interest groups as follows:

- Forest Activity / Processes;
- Employment and the Multiplier Effect – Direct and Indirect Employment Effects;
- Value-adding;
- Industry re-location;
- Impact on Small Towns and Unemployment;
- Impact on Councils;
- Tourism role and potential;
- Firewood Collection;
- Role of Plantations;
- Need for Certainty; and
- Forest Industry Restructure Packages.

4. Further issues raised during the public consultation period

This section provides expanded comments and proposals from those in Section Three and is intended to enable further and detailed consideration of the range of issues raised during the public consultation period.

4.1 Conservation

For the purposes of this section the comments will be summarised in terms of the general issues that were common themes across the West Victoria region and are then presented in relation to discrete Forest Management Areas (FMAs) to indicate specific issues raised in submissions. Note that comments and proposals regarding the Portland and Horsham FMAs are presented under the one heading as there was a strong relationship regarding suggestions to link National Parks and related fauna issues, such as the Red Tailed Black Cockatoo.

The Independent Panel observed that the level of detailed comment and proposals concerning the Portland and Horsham FMAs compared with the Otway and Midland FMAs was greater. The public consultation process revealed however that this was due to the existence of smaller reserve areas in the Portland and Horsham region which enabled highly detailed public review, contrasted with larger areas in the Otway and Midland FMAs. Note that comments identified here are not meant to indicate any greater public concern on conservation issues for one FMA from another.

The Panel also noted that many submissions proposed “blocks” for reservation that were already included in the draft CAR reserve system. Whilst several of these proposals are identified in this section, the Panel acknowledges that they presently exist as such in the Consultation Paper.

4.1.1 General

General concerns and comments about conservation issues in West Victoria are set out below.

- The likely impacts of timber harvesting on global warming and carbon-trading policy, having regard to the Inter-Governmental Agreement on the Environment, the precautionary principle, and issues of inter-generational equity.
- The use of carbon credits and support of greenhouse reduction principles should underpin forests management practices. For example, a carbon bank for companies should be encouraged as too farmers using unproductive land for forest growth.
- Placing reserves in areas that are not suitable to logging makes a mockery of the intent of the RFAs.
- Some proposed EVCs, such as lowland forest EVCs, are not in reservations of “high quality” as sections of the community expected they should be.
- Eco-tourism, medicinal plants, tree ferns, carbon sequestration and other non-timber values should be fully investigated with respect to Victorian native forests.
- The picking of Xanthorrhoea grass should be permitted in areas allocated SPZ, as this income-earning operation is a benign activity.
- The role of forestry and related harvesting activities in degrading the aquatic environment, which impacts negatively on the Victorian recreational fishing industry, was not satisfactorily addressed in the Consultation Paper.

Note that the issues presented in this report are based on those identified in the written submissions and during the hearing process and do not necessarily reflect any view or position of the Panel members.

- Substantial dedicated funding is needed to buy-back under-represented EVCs on private land. It was noted that Natural Heritage Trust funds have limited commitments in this area and that the RFA should include specific funding for this purpose. Funding should also be dedicated to monitoring the implementation of the RFA, particularly with respect to biodiversity. It was proposed that the opportunity exists for the RFA to complement the efforts of Catchment Management Authorities to conserve significant EVCs.
- Clearfelling has several demonstrated negative impacts on flora and fauna habitat and biomass, and landscape integrity should be protected. It was suggested that the motivation for clearfelling is primarily to enable woodchipping, not to imitate natural processes or to assist regeneration.
- Studies should be carried out to assess the sustainable viability of clearfell logging, which causes: increased disease status of threatened ecosystems (e.g Myrtle Wilt) and non-native weed proliferation; decreased water quality / quantity and levels of native wildlife; and devastation from cleared land producing muddy runoff.
- Following a thorough flora and fauna survey, the only form of logging should be selective logging that retains habitat trees and other conservation values. Logging threatens the survival of flora and fauna and significant areas of habitat should be protected from logging and timber harvesting to avoid extinction of native species. Logging should not be permitted in linear reserve corridors.
- Other impacts of logging operations / practices, such as heavier modern trucks and machines used for logging and transportation, create toxic exhaust emissions, compact soil, alter vegetation growth rates and reduce stream flows and water availability. It was proposed that regrowth on disturbed land conditions will lead to a predominance of certain species rather than original vegetation patterns.
- Old-growth and wilderness forests should be secured as dedicated, large scale, and continuous reserves such as National Parks (not SPZs).
- The preservation of existing gene pools is far easier than trying to regenerate what was once there which in turn saves expenditure on developing recovery plans.
- The tenure and permitted uses within SPZs is yet to be defined and these areas should be permanently protected.
- Private land conservation could occur in the form of covenants. Existing regulations and penalties should be enforced to prevent clear felling on private land. Some private land holders are encouraged to preserve trees and hollows through the Land for Wildlife Programs and Old Trees for Wildlife, whilst simultaneously seeing the destruction of trees on public land.
- Government should be exploring renewable resource alternatives to public native forest timber rather than promoting the logging industry (including hemp and wheat for pulp material and housing, solar and wind power generation), and seek to change consumer behaviour through social awareness campaigns.

4.1.2 Portland and Horsham FMAs

Specific comments and proposals from submissions received regarding the Portland and Horsham FMAs are set out below.

4.1.2.1 Comments

- Portland and Horsham regions currently have 80% less tree cover than in 1869. Regions now comprise of fragmented systems, having separate forests surrounded by large areas of cleared private land. There is a need for a major reservation response for all vegetation types in the Portland FMA, which the Consultation Paper fails to deliver.
- Concern was expressed about the “DNRE plantation agenda” for the Portland region, changing a mixed species / aged forest to a single aged species forest. While this is desirable for hardwood production this will lead to a collapse of bird and mammal species reliant on tree hollows to breed.
- ‘Commercial thinning’ or woodchipping in the Cobboboonee Forest should cease with a return to selective logging for local sawmills. A reserve system to protect old trees should be implemented and cull-ringing and felling practices of veteran hollow-bearing trees abolished, as over 30 species of fauna use these hollows. It was commented that ringbarking and culling of native trees in the Cobboboonee Forest desecrates microclimates and habitats.
- As lowland forest EVC is floristically different in various locations in the West region (for example Glenelg differs from the Grampians), each ecosystem should be treated differently, noting that this area is the westerly extent of the lowland forest EVC.
- The Portland and Horsham FMAs are also the most western extremities for the distribution of the Yellow-bellied Glider and Powerful Owl.
- A major reservation is required to preserve the gene pool and connect areas in a meaningful way for the long term preservation of the Portland FMA.
- The proposed reserve area for the Cobboboonee Forest only seems to cover swamp and heathland, not parts of the forest known for their trees.
- As the south-west region has limited remaining habitat, its protection is critical to species such as the Red Tailed Black Cockatoo.
- Conservation guidelines for the Square Tailed Kite and White Bellied Sea Eagle are inadequate, and burning and road construction should be banned at all times, not just in the birds’ breeding seasons.
- RFA priority species *Antechinus minimus* is not only in the northern forests of Portland FMA but also in the Cobboboonee, however it is not included in the ground mammal fauna surveys and the Comprehensive Regional Assessment Report.
- Reservations in the Cobboboonee have failed to encompass areas with a higher presence of veteran trees to reflect that there is little Old Growth in the present Portland FMA.
- Substantial private hardwood plantations (bluegum) are being established in the Portland FMA for pulpwood, therefore this should lessen the future need for introducing woodchipping in the local native forests.

- Comments were received concerning live stock grazing on reserves, with calls for both its prevention for land conservation purposes and continuation for commercial imperatives.

4.1.2.2 Proposals

The Panel observed that many of the proposals for these FMAs overlapped, therefore a general framework is presented below.

- Protect the blocks of public land stretching from the Cobboboonee Forest to Little Desert National Park (NP) in the north and across to the grassy woodlands near Gariwerd (the Grampians), and the south near the Lower Glenelg NP to Natimuk.
- Protect and implement key corridors of public land, Jilpanger Scrub through private farm tree links to Arapiles NP, to make the major connections with the Greater Glenelg Biolink in the South.
- Create a Greater Glenelg NP by additions to Casterton and Mt Arapiles-Toosan State Parks. It was noted that the far south-west already has forests and woodlands that could form the basis of a link between the coast and Little Desert NP.
- Add the following blocks to NPs due to their outstanding natural reserve and vulnerable wildlife:
 - GMZ west of Toosan section of Mt Arapiles-Toosan State Park; the GMZ Packers Block; and the GMZ west section of Ampts;
 - GMZ north section of Jilpanger Flora and Fauna Reserve to be added to Jilpanger Reserve;
 - Support string of proposed reserves 2001-2034, but 2032 needs to link up with 2030 (or give it special management status) as it is an important feeding area for the Red Tailed Black Cockatoo and a corridor for many other birds between Jilpanger and Toosan;
 - Reserve 2006 and 2007. There are no logs of millable quality in these blocks, however some significant conservation values exist; and
 - Reserve 2028 as it provides a corridor, noting that the current system is too fragmented.
- Protect Brown Stringybark and Redgum to provide necessary habitat, feeding, and nesting, for the Red Tailed Black Cockatoo.
- Protect the entire Meereek Forest, including the Mosquito Creek catchment, as a conservation reserve or park, as it is a threatened flora ecosystem and is extremely sensitive to environmental change.
- Reserve areas from Dunmore, Bessiebelle, Homerton North, and Annya State Forests (SF), and all Damp Sands Herb-Rich Foothill forest.
- Reserve and expand Surrey Ridge of the Cobboboonee and include further additions to Narrawong SF and expand Weecurra SF near Digby.
- Protect Plains Grassy Woodland and Lowland Forest. Permanently protect as parks and reserve systems all public land in the South West that is called uncommitted land in Land Conservation Council Reports. Reserve all occurrences of Plains Grassy Woodland between Grampians NP and the Black Range SP.

- Protect all blocks of Lowland Forest, Brown Stringybark Woodland, Heath Woodland, Gums Woodland, Herb-rich Foothill forests, and other EVCs.
- Improve the reservation response for the Herb-rich Foothill Woodland / Forest, noting that 25 POMAs are to be established for the West Victoria region, but are not indicated in the document. Reserve the whole of the Cobboboonee to allow for an increase in Powerful Owl numbers.
- Link the Cobboboonee forest remnants together to ensure the long-term viability of species. Considerably widen the linear CAR reserve linkages such as areas 3026, 3040 and 3029 to provide a more effective wildlife corridor.
- Conduct low level selective harvesting in Tallageria to enhance cockatoo habitat management. Progressively thin Glynwylln to ensure big trees are allowed to develop. An SMZ status, rather than an SPZ, will better help to ensure future nest sites for the Red Tailed Black Cockatoo through Red Gum thinning, thus allowing big hollow trees to develop.

4.1.3 Midlands FMA

The public consultation process revealed that a high level of community interest in forest issues exists in the Midlands FMA. This was highlighted by one proposal to trial the Wombat Forest / Midlands FMA as a pilot for the implementation of a 'community or model forestry management' scheme.

Specific comments and proposals from submissions received regarding the Midlands FMA follow.

4.1.3.1 Comments

- The aggregate for proposed lineal reserves in the Wombat Forest area has too high an 'edge to area ratio', and the linear nature of most SPZs is inadequate.
- The application of shelterwood system has been exploitative and has a high failure rate in regeneration. New management systems that can function in smaller areas of forest are required.
- Supportive of reservation of blocks containing Box Ironbark Forest, Heathy Woodland in the far west and Herb-Rich Woodland in Cobaw SF.

4.1.3.2 Proposals

- Establish the Wombat Forest as a Reserve or Park. Reserve the Cobaw Forests and Pyrete Ranges.
- Extend the Lerderderg State Park to include the Pyretes, already set aside within the Consultation Paper, and the headwaters of the Lerderderg River, bounded by Coopers and Wild Dog Road to the north, Trentham / Greendale Road to the east, Blackwood Ridge Road to the south and Camp Road to the west. Reclassify the upper Lerderderg catchment to become part of a proposed Lerderderg State Park and the Pyretes Range of the Wombat Forest.
- Ensure adequate protection of all Powerful Owls by providing a minimum radius of 500 ha. Protect the pair of Trentham Powerful Owls, which require a POMA allocation of 500 ha native forest / regrowth, having regard to the community and professionals studies on this pair.
- Apply SPZ status to the two coupes that abut the Trentham / Daylesford rail reserve.

- Extend the Wombat Forest Drive to Blackwood Ridge Road and the New Sultan track.
- Include a better proportional mix of ‘floristic communities’ for the ‘Herb Rich Foothill’ EVCs.
- Preserve all ‘wet gullies’ and riparian areas within the forests and establish a 50 meter buffer from the edge of all riparian vegetation or high water or flood mark.
- Increase protection of species such as *Acacia nano-dealbata* and *Grevillia sepens* and *obtecta*.
- Provide a 3km buffer zone of forest around the township of Blackwood, Barry’s Reef, Dales Creek, and Simmons Reef. Cancel the two logging coupes on Simmons Reef and the other north of Dales Creek to achieve this. Provide at least 500 meters along both sides of the road between Greendale, Blackwood, and Trentham.
- Increase reserves to Langi-Ghiran, Mount Buangor and Enfield State Parks.
- Reserve Mount Cole and give consideration to its inclusion in the Mt Buangor State Park.

4.1.4 Otway FMA

Specific comments and proposals from submissions received regarding the Otway FMA follow.

4.1.4.1 Comments

- Concerned about the future of the endangered Tiger Quoll. Proposing that the reserve system and draft conservation guidelines are inadequate to protect the Tiger Quoll and that reports on its numbers, habitats etc. are required before a final decision is made. The rotation times for timber harvesting are too short to enable the forest to develop the old-growth attributes that the species requires. If the Tiger Quoll is to survive in the medium term then Mt Eccles / Lake Condah (in the Portland area) also needs to be connected. DNRE’s draft ‘Quoll Report’ identifies clear-felling and the widespread use of 1080 bait to protect new trees as reasons for a collapse in Tiger Quoll numbers. Areas identified for Tiger Quoll protection include:
 - Wyelangta;
 - Charleys Creek;
 - Beech Forrest – Harveys Track;
 - Riley’s Ridge Track;
 - Sunnyside Road;
 - Henrys Track;
 - Cumberland River Falls; and
 - Turtons Track.
- Concerned about the future of Gang-gang cockatoos in the Otways.
- Questions the cost benefit of timber harvesting in relation to Wild Dog Valley, noting the *Wild Dog Creek Landscape Study* that recognised the scenic quality of the area.
- Has the east section of Barrabool Reserve had a flora and fauna survey completed? A recent survey found *Sclerolaena napiformis* close to this area which should have been an addition.
- The draft CAR reserve system provides insufficient consideration and protection of wet sclerophyll and Old Growth forest.

4.1.4.2 Proposals

- Extend the Otway NP and the Lorne Angahook SP to incorporate water catchments and important wildlife corridors. Examine the proposal for the Trans Otway Walk. Include all State Forest on the South East facing ridges between Mount Sabine and Erskine Falls Road, including the river catchments of the St Georges, Cumberland, Wye, Kennett, Grey, Carisbrook and Smythe Rivers. Also include Delaney Rd and out to Benwerrin Rd, and then to Mt Cowley track. The streams on the Otway slopes would have their full catchments protected rather than their headwaters being logged.
- Extend Otway NP to incorporate water catchments and wildlife corridors, especially Aire River Catchment and Myrtle Beech Wet Cool Temperate Rainforest.
- Incorporate and reserve most of Otway State Forests into NPs, including the catchments of the Wild Dog Creek, East and West Barham Creeks, the Big Tree Reserve, Riley's Ridge, and the Yannathan and Allanbee Falls.
- Reserve all of Bannockburn Bush.
- Reserves should include Geelong Environment Council (GEC) Otways National Park extension document. The GEC Study undertaken for Western Otways should also be undertaken for Eastern Otways.
- Protect Mud Fish and Australian Grayling, especially in the Wye River and its valley. Immediately cease clearfell logging in the Mud Road valley.
- Change the land status on the Great Ocean Road between Apollo Bay and Lavers Hill to NP status, ie: extend Otway NP.
- Increase research of all identified ecosystems within an expanded NP system in the Otway Ranges.
- Protect biodiversity, endemic species and microclimate of native Otway flora and fauna. Conduct pre- and post- logging surveys of flora and fauna.
- Establish strips of 25-30m along roadsides to provide wildlife corridors.
- DNRE should widen the buffer zone in the Otway FMP to 60 metres as established in the Code of Forest Practices for Timber Production.
- Phase out hardwood logging in the Otway FMA over a five-year period. Replace hardwood logging on public land with hardwood plantations on degraded farmland.
- Establish and expand the linkage between 7018 and 7038, as it is a strategic link.

- Join the following areas by corridors (refer to Map 2 in the Consultation Paper):
 - 7001 and 7002;
 - 7008, 7009 and 7010 (SPZ not SMZ);
 - 7012, 7013, 7014, 7015, 7016 and 7018;
 - 7012 and 7032;
 - 7033, 7034, 7035, 7036, 7037;
 - 7037 and 7040;
 - 7039 and 7040;
 - 7018 and 7038;
 - 7049 and 7054;
 - 7065, 7066, 7067 and 7068;
 - 7068 and 7081;
 - 7081, 7082, 7083; and
 - 7074 and 7075.

4.2 Water Catchment Management

General comments and proposals about water catchment issues in West Victoria are set out below.

4.2.1 Comments

- The Consultation Paper failed to give appropriate economic weight to issues of catchment yield (quality and quantity) versus logging, displaying only superficial consideration to expected reductions in stream flows. Many submissions referred to the Auditor General's report on the Timber Industry which noted that DNRE needed to develop procedures to enable economic values of wood and water to be prioritised.⁹
- Logging should be suspended until further studies on its impacts on water yield are undertaken. A number of submissions cited research that indicated that there is a significant effect on water yield as a result of clear felling, and that the value of water lost through logging in catchments is at least three times the value of woodchips and timber harvesting. In addition, a number of major research undertakings were also cited which concluded, among other things, that water yield is almost twice from old growth forests than from young forests, and therefore timber harvesting in catchments should cease or be improved.
- Wood production in water catchments will impose additional costs to affected communities in the form of increased water treatment expenses and costs associated with siltation and reduced water availability. Concerns were also raised regarding the use of herbicides to control weeds in silviculture that may enter and damage waterways.
- A lack of adequate rainfall will not enable allowable harvest rates to be achieved. Forests will not reach their full maturity based on the proposed water yields, which in turn impacts on the availability of sawlogs for the timber industry.

⁹ See footnote 8.

- Clear felling practices, with inadequate buffers and declining vegetation, increase soil erosion and therefore siltation in streams, for example as reported in the Cumberland River waterways. It was noted that the Code of Forest Practices for Timber Production does not fulfil the purpose of protecting water quality and that problems still occur from turbidity in the Otway catchments as buffer zones are not being adhered to.
- Water catchment areas in the south and southwest should have the same protection as for the Melbourne area.
- Access to adequate future water supplies is required to enable further significant investments and expansion into the region's food and tourism industries.

4.2.2 Proposals

Proposals raised for consideration to address the above concerns are to:

- Nominate the Midlands FMA Mineral Springs and their Recharge Areas for listing by the Australian Heritage Commission. Research is required to determine the impact of timber-related activities on Mineral Springs Recharge Areas.
- Develop and implement a closed catchment policy so that logging should be excluded from water supply areas. This includes the Otway catchments and Upper Lerderderg.
- Water supply reserves in West Wimmera should be extended to include Gillies Lagoon, the Tulloch, Cemetery Swamp, and Kanawinka fault line areas.
- Include the West Barham Catchment in the Big Tree Reserve as Apollo Bay's water source and expand those reserves to include water catchment areas for Geelong and Warrnambool.

4.3 Forest Industry / Opportunities

Many submissions challenged the method of establishing sawlog quotas, noting that the range of locked up areas would make harvesting, planning and resourcing difficult. It was repeatedly commented that this potential impact is inconsistent with the Federal and State Government's commitments to safeguard jobs in rural / regional areas. Further, the suggestion that expanding plantations or tourism can offset scaling down of native timber harvesting and absorb timber related job losses was rejected in many submissions, noting that most timber workers are not able to be reskilled or redeployed into alternative work.

Some submissions commented that the objective to develop a competitive Australian timber industry failed to give due consideration of competitiveness in the global market place, noting that much of the world's forest harvesting does not provide environmental protection, local rights or return for loss of resources.

Specific issues concerning the timber industry can be categorised as follows:

- Timber Resource Availability / Sustainable Yield Estimates;
- Job losses and industry restructuring;
- Ecologically Sustainable Forest Management; and
- Industry development opportunities.

4.3.1 Timber Resource Availability / Sustainable Yield Estimates

Many submissions were highly critical of the data integrity upon which the RFA analyses and proposals are based and the downward revision of the TRAs at a late stage in the process. Industry-related stakeholders considered that the current forest management practices in the West Victoria area employed by industry and DNRE are sustainable (for example by using selective logging and incorporating silvicultural practices where appropriate).

Further concern was expressed that DNRE advice on the sustainable yield in the report is based on the increment on current sawlogs and over mature forest, excluding the increment on regeneration from 1930 works onwards. Some submissions maintained that this also excludes these sections from the area available for logging. It was proposed that an accurate total increment of all available forest must include the higher annual increment on all the age classes and the areas currently excluded from the area statements. It was further proposed that this is a significant oversight and consequent error in the calculation and data modelling used to determine the current proposals.

Several submissions maintained that the new TRA estimates are lower than the legislated sustainable yield rates and would be even lower if the proposed CAR system is adopted. It was also noted that no options to rectify the sustainable yield deficiencies were explored in the Consultation Paper. It was suggested that the baseline TRA must include new models to estimate areas excluded from harvesting due to the Code of Forest Practices for Timber Production and the implementation of new policies which differ from the previous determinations of sawlog yields under the Timber Industry Strategy. It was further suggested that the total volumes of all timbers on a per annum basis should be specified, rather than just sawlogs volumes.

A large number of submissions proposed that the draft CAR reserve system should be redesigned to meet JANIS criteria by including private land. Questions were raised as to why the Code of Forest Practices for Timber Production reserves were not accepted as a legitimate part of the draft CAR system, proposing that EVCs have been reserved to a greater degree than required under JANIS criteria. It was suggested to modify the CAR reserves by moving boundaries and deferring reserves until alternative supplies come on line.

The boundaries for SPZs were also criticised as they were considered to be poorly defined and allow for error and further policy changes. There was a belief that the application of 10-15% contingency fails to quantify uncertainties. The rationale of the proposal to convert parcels 2044-2065 to restricted reserves was questioned.

Concerns were also raised that forest impacts and implications of lower yields on adjoining private forests, and the role of off reserve management in managing biodiversity were not addressed in the Consultation Paper.

4.3.2 Job Losses and Industry Restructuring

Submissions were made that the State and Commonwealth Governments should ensure that local governments and communities do not have to bear the social and economic consequences of timber industry related job losses.

Industry-related submitters commented that the adoption of current proposals and reduction in sawlog entitlements would have damaging direct and indirect impacts on employment supported by forest industries. Industry collectively identified a potential loss of 300-350 jobs in forest and related activity if the RFA proposals are adopted (excluding multiplier effects).

4.3.3 Ecologically Sustainable Forest Management

Issues identified to address the topic of Ecologically Sustainable Forest Management practices follow.

- Ensure utilisers of resources from State Forests accept that they have an ‘environmental, economic and social’ responsibility when they make use of public forests.
- Improve forest management and equipment handling techniques.
- Switch areas retained for production immediately to shovel logging to reduce top soil disturbance and the mixing of top soil with subsoil.
- Develop and implement a new government - industry strategy and action plan to enable the:
 - application of a stand spacing program in forests such as Enfield and Pyrennes Forests;
 - processing and marketing of products made from C and D grade sawlogs; and
 - maximum sawlog recovery from all forest operations.
- Seek government and industry commitment to developing radial sawmill techniques as a viable value-adding option, which can take advantage of faster growing smaller diameter plantation logs.

4.3.4 Industry Development Opportunities

The following issues were identified as industry development opportunities:

- Retain the areas of Mt Cole along the Manly’s Point, Franc’s, Lower Wimmera and Glut areas in the W.U.P.s Harvest Management as they will yield good quality saw logs.
- Provide small to medium sized sawmills equal status and focus within the industry.
- Investigate the feasibility of selective logging for art and high grade furniture applications for those areas that fall outside prescribed water catchments.

4.4 Other Forest Uses

Submissions about the implications of the draft CAR reserve system regarding other forest uses were received, mainly from the firewood and post, apiary, and mining industries.

4.4.1 Firewood and Post Industry

Submissions supporting the continuation of wood collection, primarily in the Dunworthy Common Area were received. It was particularly noted that many Ararat people rely on firewood for winter warmth and that instead of travelling 5km to collect firewood they would have to travel 40km. A few submissions proposed however that weekenders could buy their firewood from commercial cutters.

4.4.2 Apiary Industry

Some submissions commented that any proposals to limit apiculture were unacceptable, noting concerns that increased reserves and SPZs may reduce the current levels of forest access and adversely affect business. Comments were made that commercially managed hives have benign effects on the natural ecosystem and that improved forest management practices to safeguard existing bee sites are required.

It was proposed that the forests of West Victoria be mapped to indicate the annual honey productivity of the respective part of the forests.

4.4.3 Mining Industry

The mining industry commented that its previous issues were not responded to by the RFA-SC. This industry noted that public land exempt from mineral activity has increased from 2% to 35% in the past 20 years, and it is seeking no expansion of the existing exempt area. The industry also seeks access to explore within currently exempt land. Industry regards blanket prohibition as negative policy that does not recognise the industry's high environmental management practices. Comments were made that planning laws have demonstrated effectiveness in protecting natural and social values and are applicable to any environment. Planning legislation does not assume activity is unacceptable without allowing consideration of the impacts and available means to manage them. It was proposed that designation of highly prospective areas to an exempt category would send negative signals to investors.

4.4.3.1 Proposal

The following block numbers are identified in the Consultation Paper as Reserve Areas of high prospectivity within the category of "additions to the Conservation of Parks and Reserves". It is proposed that mineral exploration or mining not be excluded from the following areas:

- | | |
|--------------|--------------------------------------|
| – 2001-2042 | – 3011-3014 |
| – 2050, 2051 | – 6001 |
| – 2052 | – 6002-6004 |
| – 2057 | – 6005-6016, 6017-6018, 6020, 6023 |
| – 2058 | – 6044, 6045, 6046 |
| – 2059 | – 6047, 6049, 6051 |
| – 2060 | – 6060, 6062, 6066 |
| – 2064 | – 6067-6074 |
| – 2066-2068 | – 6075, 6077 |
| – 2069 | – 6081 |
| – 2070 | – 6083-6087 |
| – 2072 | – 6100-6109, 6112, 6114, 6115, 6117, |
| – 2073 | 6102-6123 |
| – 2075-2076 | – 6126, 6128, 6130-6137, 6141 |
| – 2077-2079 | – 6155-6158, 6161, 6162, 6164-6166, |
| – 2080 | 6168, 6170, 6172 |
| – 3001, 3002 | – 6177 |
| – 3003, 3007 | – 6178, 6179, 6182, 6183, 6184 |

4.5 Scenic, Recreation and Tourism

General comments and proposals about tourism related issues in West Victoria are set out below.

4.5.1 Comments

- The current and projected economic value of tourism development needs to be considered relative to that of the timber industry. For example, it was often raised that tourism is a \$300 million industry to the Colac-Otway and Surf Coast Shire and is a major employer in the region, with robust growth predicted to continue. Additional regional employment opportunities would be created if tourism were expanded.
- Scenic, recreation and tourism resources are not considered in the draft CAR reserve system if they are not part of a defined National Estate or Wilderness area, which means for the most part they have already been reserved as part of existing National, State or Coastal Parks. There appears to be no case in which scenic, recreation and tourism values have been used for the designation of a CAR reserve in the RFA process. There are a number of cases where local or regional values may have been overlooked which may deserve some form of reserve status due to their scenic, recreation or tourism values, but appear not to have been given rigorous assessment and consideration.
- Clearfell logging impacts negatively on the scenic quality of forest drives and walking routes. Some respondents were critical of the fragmented and small reserves that provide little use as bushwalking areas.
- The adoption of the proposals will impact negatively on the recreational activities of the axemen's association in the Wombat area.
- Commercial tours and eco-tourism are rapidly developing industries around West Victoria, especially in and around Daylesford, Trentham, the Macedon Shire, Portland, Glenelg, Mt Arapiles, the Grampians, and the Otways Forests. Government should encourage the ongoing development of eco-tourism.
- Current tourism initiatives were noted, including:
 - Tourism Victoria's *Great Ocean Road Tourism* development strategy and Geelong Otway Tourism's *Nature Based Tourism* strategy for the Otways Forests;
 - the Great South West Walk in the Portland area; and
 - the Macedon Ranges and Spa Country.
- Tourism values should not only include local companies but also consider broader tourism networks that facilitate regional tourism.
- Recreational activities such as prospecting, fossicking and orienteering were raised as low impact activities that should not be restricted to forest access by the proposed reserves. It was noted that orienteering has little impact on forest values or other forest users but can boost the local economy. Any changes to the forest reserve boundaries are likely to have associated increased costs to adjust orienteering maps.
- The RFA reserve allocation process does not appear to recognise the upper elevation areas in the Southern Otway Region, with the exception of the water supply catchment of the West Barwon Reservoir. (This area falls on the north side of the Otway divide and represents a

different environmental, scenic and recreational setting to the ridgetop settings with southerly aspects.)

- Turtons Track is a popular scenic route for local residents and tourists. The Forrest - Colac Road, Skenes Creek Road and Wild Dog Creek Road provide the north-south links required in this area. Further west such scenic routes are not possible given the visual impacts of the Aire Plantation and other timber harvest effects in that vicinity. It is important to look more closely at how a National Park, State Park or scenic reserve located at higher elevations along the available north-south routes may enhance tourism and recreation activity in the Southern Otway Region.
- International tourists are attracted to “icons” having National Park Status, and the parks and reserves in the Otways, which display comparable values, should be given appropriate status to promote international tourism. For example, classify the Great Ocean Road region as a public reserve to realise its tourism potential.

4.5.2 Proposals

Proposals raised for consideration to address the above concerns are to:

- Protect the Wild Dog Creek Valley, as only protecting one side of a valley will not safeguard the visual values of the whole valley. Develop the north-south tourism routes as an adjunct to coastal tourism. Turtons Track, Forrest Colac Road, Skenes Creek Road, Triplet Falls, Killala / Old Bay Road and Wild Dog Creek Road provide these scenic links. Official designation of these roads for scenic tourism purposes would meet some of the objectives in the *Great Ocean Road Tourism Development Plan*.
- Preserve the Timboon Rail Trail, which provides a tourist link of coast to volcanic areas. This would enable preservation of historic bridges and industries; an unbroken segment of original vegetation from plains to coast; rare and vulnerable flora and fauna habitat; and provide links for many remnant forest blocks on private land.
- Include the Seaview-Smythes Creek area within the CAR reserve system. This area should be included as it: is highly representative of rugged steeply dissected areas of the Otway Range; provides sites of high geological and geomorphological significance; high value streams and rivers; the opportunity to preserve the high ridge ecosystems and habitats in a contiguous manner; contains old growth; and offers significant tourism, ecotourism and recreation values.
- Extend Lorne Angahook State Park, including all State Forest on the south east ridges between Mount Sabine and Erskine Falls Road, the catchments of the St Georges, Cumberland, Wye, Kennett, Grey, Carisbrook and Smyth Rivers, to increase the tourism potential of the Hinterland.
- Protect the corridor of the Daylesford-Trentham railway, which is partly a tourist railway and a walk, with the view to completing the railway.

4.6 Social

A common issue raised in the consultation period was that many people who made ‘life style’ changes to move from urban to rural communities hold concerns that ongoing logging activities will diminish their rural amenity value.

Additional comments on the possible social damage from job losses and the Social Assessment Report are addressed in further detail in this document under the heading of ‘Timber Industry / Opportunities’ and ‘West Victoria RFA Consultation Process’.

Key comments raised regarding social issues follow.

4.6.1 Heritage Values

There was criticism that the *National Estate Identification and Assessment in the West Region of Victoria* was released late in the consultation period.

4.6.2 Safety Issues

Strong concerns were expressed that forest management fire control issues were not adequately addressed in the Consultation Paper. Comments were made that the risk of fire destruction to the community would increase through the loss of logging industry firefighting equipment should the draft CAR reserves be adopted. The current use of timber industry personnel, logging machinery and road access to assist in emergency fire response management was highlighted in several submissions.

Some submissions raised concerns with vehicular safety in certain areas subject to heavy logging machinery, referring to supporting correspondence from the Royal Automobile Club of Victoria and the Royal Australasian College of Surgeons.

4.6.3 The Social Assessment Report

A significant number of submissions were highly critical of the late release of the Social Assessment Report during the consultation period and its failure to adequately address the impacts of indirect employment. Comments were made that the data collection methods lacked substantial and strategic assessment of the diversity of the community groups and stakeholders across the West Victoria region. It was further commented that the process provided no significant, pro-active decision making inputs from both timber and non-timber stakeholders, as well as local communities.

4.7 Economic Impacts

Further comments on the economic analyses in the Consultation Paper are presented in this section in terms of: a) the nature of the economic analysis, and b) a summary of viewpoints on likely economic and related impacts.

- Broad comments on the nature of the economic analysis.

It was proposed that the State Government should review existing industry practices in relation to the principles of National Competition Policy and competitive market behaviour. It was noted that Section 45 of the *Trade Practices Act* prohibits contracts, arrangements or understandings that have the effect of lessening competition in the market place. It was suggested that the disclosure of logging subsidies, royalties and debts in West Victoria would aid the public and

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decision-makers. It was further proposed that if sawlog royalties were higher, then on the demand side, the resource would be put to higher value uses.

- Summary of viewpoints on likely economic and related impacts.

Expanding on a number of the issues raised in the above sections, viewpoints are summarised into eleven topic categories, often with directly opposing viewpoints identified for each of the two broad stakeholder interest groups (see Table Two).

The categories are as follows:

- Forest Activity/Processes;
- Employment and the Multiplier Effect – Direct and Indirect Employment Effects;
- Value-adding;
- Industry re-location;
- Impact on Small Towns and Unemployment;
- Impact on Councils;
- Tourism role and potential;
- Firewood Collection;
- Role of Plantations;
- Need for Certainty; and
- Forest Industry Restructure Packages.

Table Two: Summaries of stakeholder views on likely economic and related impacts associated with the West Victoria RFA Consultation Paper.

ECONOMIC IMPACT	INDUSTRY-RELATED VIEWPOINT	CONSERVATION-RELATED VIEWPOINT
Forest Activity/Processes	<ul style="list-style-type: none"> • need to access forest resources so as to meet demand for forest products and sustain local and regional industry • almost \$2 billion trade deficit in timber-related products (Australia) • clear-felling is necessary to allow regeneration of forest • there are techniques and equipment in use in some forest areas to protect understory (such as ‘shovelling’) • the industry is not woodchip-driven; woodchips are basically an outcome from sawlog processing and from clean-up of the forest floor (including decayed trees) to allow re-growth • reserves system removes areas from harvesting, even though environmental values are not high • need to review the reserves 	<ul style="list-style-type: none"> • the timber industry is woodchip-driven; this is uneconomic and represents a waste of forest resources • biodiversity values are higher than industry values • there are higher-value activities (tourism) that should be encouraged in place of timber (see later) • clear-felling destroys habitat and biomass. • reserve system includes areas that would not be harvested in any event, and therefore only serve to inflate the areas designated for ‘protection’ • need to review the reserves
Employment and the Multiplier Effect – Direct and Indirect Employment Effects	<ul style="list-style-type: none"> • need to consider both the direct and indirect employment supported by forest industries • employment multiplier for forest activity and downstream production ranges from 2.5 to 4 or even 6. • approx. 405 jobs identified in mills and processors appearing before the Panel. These jobs possibly support another 1,200 or more jobs through multiplier. • industry sees potential loss of 300-350 jobs in forest and related activity as a result of the RFA proposals (if implemented) 	<ul style="list-style-type: none"> • employment in timber industry is not significant • growth potential in timber and related industry is not great • “no RFA agreement in Australia has generated a single extra job in the timber industry” • employment prospects are greater in tourism (see below) • employment losses would occur anyway in the existing environment, through efficiency gains in milling activities.

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Table Two (cont.)

ECONOMIC IMPACT	INDUSTRY-RELATED VIEWPOINT	CONSERVATION-RELATED VIEWPOINT
Value-Adding	<ul style="list-style-type: none"> timber firms have invested a lot in recent years to achieve higher productivity and value-adding examples of individual firms investing several million dollars to lift productivity and value-added output this was in response to Government encouragement – now, and without warning, Government withdraws potential for harvesting that industry was led to believe it had access to extreme concern that no more investment funds will be directed to timber industry because of this limitation on available resource, combined with uncertainty in the industry regarding Government policy estimates of value of the timber industry at \$33 million do not reflect value-adding contributions in furniture, building materials, etc CFMEU believes value-adding activity in the timber industry has not been fast enough 	<ul style="list-style-type: none"> economic value attributed to forest industry does not allow for the substantial economic values that should be attributed to water supply, scenic values (for tourism), and lifestyle values alternatively, the economic values attributed in RFA to timber industry do not reflect the <u>costs</u> that the local and wider communities must pay in regard to water treatment, erosion, etc. Claim and counter-claim regarding reduced water quality due to logging in Otways reports by Auditor General and KPMG indicate that value-adding revenues in timber industry are not significant (although Government and industry have responses to this view) some mills (named) are likely to close anyway, by taking the exit package on offer, in the view of some observers
Industry Re-location	<ul style="list-style-type: none"> not feasible for mills to re-locate to other places where timber resources are available – too costly at possibly \$300,000 for a small saw mill to relocate labour will not relocate to follow a mill 	<ul style="list-style-type: none"> industry should possibly relocate to meet opportunities in other localities
Impact on Small Towns / Communities and Impact on Unemployment	<ul style="list-style-type: none"> reduction in forest and related employment means more people unemployed unemployed forestry workers and processors (mills etc) cannot readily move into alternative employment unemployment already high in small towns in West Victoria, with around 14% or so being registered unemployed in these towns also means reduction in investment in timber industry, with consequent decline in activity levels, including decline in jobs 	<ul style="list-style-type: none"> growth in many places is now in tourism and related activity examples of eco-tourism etc timber and related activities no longer underpin employment in many of our towns (eg Apollo Bay and the Surf Coast communities in general) tourism in Trentham contributes \$1 million pa compared with the \$250,000 generated in royalties for 80 ha of forest land (claim) Trentham does not receive any direct income from timber employment.

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Table Two (cont.)

ECONOMIC IMPACT	INDUSTRY-RELATED VIEWPOINT	CONSERVATION-RELATED VIEWPOINT
Impact on Small Towns / Communities and Impact on Unemployment (cont.)	<ul style="list-style-type: none"> • small town communities under threat as jobs decline and population moves away. Consequent reduction in service levels (schools, other services close/retract, etc) • “people need to understand that in regional Victoria we need to grasp every job we can find” • timber firms contribute substantially more to towns than the Social Assessment Report indicates – figures indicate one contractor alone spends \$900,000 pa in Ballarat, and that another contractor spends \$4 million in the Midlands (while RFA paper attributes \$4 million as the amount contributed by <u>all</u> of the industry to the Midlands) • consider the importance of social cohesion in timber towns – cannot dismantle timber industry that easily 	
Impact on Councils	<ul style="list-style-type: none"> • above-listed adverse effects on towns and their communities means that local Councils have to provide additional support of a welfare nature • this further adversely affects Councils ability to provide services to whole municipalities 	
Tourism Role and Potential	<ul style="list-style-type: none"> • tourism is responsible in many instances for providing visitor access to scenic areas due to presence of forest roads and their maintenance • tourism co-exists with forests and timber industry, and this has been the case for many years (see other parts of the State, as well, such as North East around Myrtleford, Bright) • note the growth in tourism in popular areas even though there is a forest industry (eg, Otways, Daylesford) • forest-related workers are unlikely to retrain – note their typical average age (over 40 yrs) and educational background – their life is in timber work; many are 3rd generation or older 	<ul style="list-style-type: none"> • tourism is a growth industry, and people are attracted to the forests • this is not possible where areas continue to be denuded of trees (especially in Otways) • forest areas need “Park” status so that investment funds and visitors can be attracted (as in case of the Grampians) • tourism underpins economic growth in places like Apollo Bay and Daylesford; further timber harvesting is likely to detract from this growth • in Surf Coast Shire, tourism generates 1,970 jobs (1995 data) while timber accounts for 150 jobs, hence importance in fostering tourism • forest-related workers can re-train for employment in tourism and related activity (including specialised forest products, eco-tourism tours, etc) • potential traffic and other safety hazards where forest uses and visitor numbers are involved

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Table Two (cont.)

ECONOMIC IMPACT	INDUSTRY-RELATED VIEWPOINT	CONSERVATION-RELATED VIEWPOINT
Firewood Collection	<ul style="list-style-type: none"> • RFA process overlooks importance of fire-wood collection, especially for low income families • fire-wood collection is also a family tradition in many west Victorian communities 	<ul style="list-style-type: none"> • should leave firewood on forest floor • this assists wildlife habitat • not many people are actually involved in fire-wood collection as an income source • could perhaps limit firewood collection on the basis of vehicle size
Plantations Role	<ul style="list-style-type: none"> • plantations take 40 years to reach harvest • cannot wait this length of time • could have a restructure plan that allows phase-out of forests and introduction of plantation timber (see VAFI) • plantations seen as longer term direction for industry growth • some mills already sourcing timber from plantations to supplement native forests 	<ul style="list-style-type: none"> • should be more emphasis on developing plantations, and move out of native forests
Need for Certainty	<ul style="list-style-type: none"> • industry has no certainty now regarding government policy on timber industry • workers have no certainty • investors have no certainty 	<ul style="list-style-type: none"> • RFA provides no certainty that environmental and biodiversity factors are taken into account
Forest Industry Restructure Packages	<ul style="list-style-type: none"> • funds to encourage exit from the timber industry are inadequate • payouts are based on the average of the past three years trading, but a number of firms have invested heavily in that period and are only now making a profit; so any payout based on the existing scheme would undervalue the firm • the process for payouts is not transparent • funds should be used to restructure the industry and enhance its growth opportunities, rather than simply paying firms to exit • “no-one has looked at how to make the transition” from existing timber industry practices to a new regime (senior timber industry representative) 	<ul style="list-style-type: none"> • funds to encourage firms to exit should be expanded; not enough is provided

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4.8 West Victoria RFA Consultation Process

Virtually all submitters held common viewpoints (essentially critical) about the implementation of the consultation process for the West Victoria RFA, criticising a range of issues associated with the current and previous processes. General concerns and comments about the West Victoria RFA Consultation Process include the following:

- Timeframe;
- Information Availability;
- Implementation of consultation process;
- Social Assessment Report;
- The role of both Governments in the West Victoria RFA process; and
- Community suggestions to improve future consultation processes.

4.8.1 Timeframe

It was commented that the seven-week consultation process for a twenty-year RFA that is reviewed four times is inadequate, and the 20-year duration of RFA is too long. Several submissions suggested that the current process is being rushed through to protect the status quo. Many proposed that the RFA should be no longer than 10 years and reviewed after 5 years. There was a general perception from some submissions that the signing of the RFA agreement would result in unlimited woodchip and clearfell logging for 20 years. Many submissions commented that two consultation processes (West Victorian and Gippsland) occurring simultaneously compounded the problems associated with the short timelines.

4.8.2 Information Availability

A significant number of submissions proposed that inadequate, inaccessible or incomplete data inhibits one's ability to make properly informed decisions. Further, there was strong concern that the RFA process is occurring before the definitions underpinning it have been clearly articulated and key wildlife studies completed. The process was considered by many to be narrowly focussed on finding the maximum amount of wood that can be extracted.

It was strongly noted that information was provided to the public on a 'drip-feed process', for example the:

- *National Estate Identification and Assessment in the West Region of Victoria* values and nominations and *Biodiversity Assessment* reports and species maps should have been available prior to the commencement of the consultation process; and
- the impacts of clearfelling on the Tiger Quoll species, including impact of competition from foxes are unknown.

The data quality, particularly Tables 3.1 and 3.2 in the Consultation Paper, and large-scale maps provided were viewed by many as inadequate. Editing errors in the Consultation Paper were pointed out, for example with 5 EVCs having significant remaining extents in GMZ (749, 750, 756, 780, 783) plus two other significant extents in GMZ, and an error in Map 2 in EVC descriptions. These errors are believed to throw some doubt on the accuracy or reliability level indicator on the map.

Some submissions commented that there is a need for greater public access to economic information regarding the timber industry. It was also noted that woodchip figures were absent from the Consultation Paper and that the relationship between sawlogs and woodchips needs to be clearly defined to determine annual woodchip harvest and limits placed on woodchipping.

The comprehensiveness of ground mammal surveys conducted during the CRA period, the resources available to conduct them, and the EVC mapping methodology was questioned. It was suggested this be data be closely scrutinised by government and made publicly available.

There was also strong criticism that the Consultation Paper and process did not: identify individual impacts to saw mills; provide accurate TRA data and adequate consultation with affected stakeholders; nor accurately reflect the multiplier effects of job losses.

Specific comments related to the type and veracity of information provided in the RFA reports (as well as the lateness in report availability, as noted above). Examples of specific areas of criticism regarding ‘information’ (from both sides of the issue) relate to the following questions:

- what are the accurate estimates of forest resource and sustainable yield?
- why was the contingency factor of 10% applied in estimates of sustainable yield?
- why did DNRE change its estimates (downwards) on sustainable yield?
- what are the true numbers of existing jobs in the industry?
- why are multiplier effects (downstream/upstream) not taken into account?
- what are the appropriate employment multipliers to apply?
- why were alleged ‘subsidies’ to industry not closely considered or built into the analysis?
- why were scenic and visual values not taken into account in impact assessments?
- why were alternative forest uses not taken into account in detailed assessments (such as water value and tourism value), or alternative products (such as hemp)?
- why were community values not taken into consideration?

4.8.3 Implementation of Consultation Process

Virtually all submitters were critical of the implementation of the RFA consultation process, which was viewed by many as totally inadequate. Several submissions proposed that all stakeholders should have been consulted before unilaterally changing established policies as realised in the Consultation Paper. A lack of satisfaction that a full consideration and representation of issues raised in Chapter 6 of the CRA Paper was also expressed. Some submissions even suggested that the RFA process itself impairs the ability of the community to act co-operatively to generate regional development.

Further comments covered the following aspects:

- lack of information (see above);
- lack of veracity in the information provided (see above);

- cannot apply the same ‘model’ across various parts of the region as each area is different;
- industry impacts do not address multiplier effects;
- no consideration of community (or social) impacts (ranging from lifestyle to fire wood collection);
- some important values not considered in the impact assessment (eg, lack of consideration of scenic or visual impact values); and
- no reasons provided for underlying assumptions (eg, in the application of the 10% contingency factor in assessing sustainable yield).

4.8.4 Social Assessment Report

There was a high level of criticism concerning the Social Assessment Report in terms of its release time and the data collection methodology engaged for the analysis. Many considered that the report lacked substantial and strategic assessment of the diversity of the community groups/stakeholders across the region, failing to provide any instructive social vision. Further, many held that the report provided no significant, pro-active decision making inputs from timber and non-timber stakeholders, and local communities. For example, local jobs provided by forest harvesting are often under sub-contracting arrangements that do not give local workers participation in how the industry operates. The exclusion of the City of Geelong from the Social Assessment process was considered by some to be a major oversight.

4.8.5 Role of Governments in the West Victoria RFA process

Many submissions were highly critical of the role of both Governments in the development and implementation of the West Victoria RFA process, indicating a strong lack of trust in forest managers and lack of public confidence in the Governments by some sections of the community. Enforcement procedures / mechanisms that are in place for breaches of licence conditions, grading system for logs, compliance with the Code of Forest Practices for Timber Production, and management of reserve allocations were criticised and requested to be strengthened.

There were several challenges as to why DNRE officers were included in employment figures for the timber industry. There was also a strong call for transparency and accountability of both Governments in relation to forest management and the structure and function of DNRE’s Forestry Victoria. Criticism of the decision to aggregate the Portland and Horsham FMA employment figures and the Consultation Paper’s failure to show royalty returns to Government was received.

Concerns were also raised that the Commonwealth removal of export controls will make the industry openly woodchip driven.

4.8.6 Community suggestions to improve future consultation processes

Comments raised for consideration to address the above concerns include the suggestion that in future meaningful consultation processes occur whereby:

- Community perceptions of overlogging in relation to legislated sustainable yields in areas, such as East Gippsland where an RFA has been in force, are specifically addressed.
- Public consultation processes should be comprehensive and not perceived to have a predetermined outcome. It was considered important to overcome perceptions of a process biased towards the logging industry and designed as a way of guaranteeing security of tenure.
- Genuine consideration should be given to other stakeholders with direct non-logging economic interests in the native forest, eg tourist operators, the water industries, and horticulture. Consideration should also be given to stakeholders with non-financial interests in forests such as recreational users and those who derive social/cultural values from native forests.
- Government should develop and implement a clear policy position with regard to woodchipping and the implementation of appropriate ceiling levels.
- Community confidence in consultative processes would be fostered through the insertion of a feedback loop within the RFA based on environmental performance reporting to a level comparable to or better than the ISO 14001 Quality Environment Standards.

Further suggestions to improve future consultation processes are to:

- Engage Catchment Management Authorities and local government to foster positive networks to manage community issues related to the RFA proposals in a localised, constructive and inclusive manner.
- Insert a provision in the RFA for a continuation of community grants to monitor the implementation of the RFA.
- Increase DNRE staffing levels to reverse substantial knowledge and experience lost over the last decade.
- Review the Code of Forest Practices for Timber Production and insert annual independent auditing requirements into the RFA.
- Use the “awareness” and “participation” grants to make the continuing public consultation process a positive and constructive one. The ‘rfa.gov.au’ website could be used as an interactive site for open consultation with all individuals and groups.
- Establish an independently funded semi-government department (e.g. Environment Assessment Council) to oversee protection of biodiversity and other forest management issues.
- Ensure that future government meetings on forest issues include cross-ministerial representation (tourism, environment, regional development etc.) which acknowledges the diversity of values represented in the forests.
- Ensure all commitments before, during and downstream of the RFAs have time frame requirements specified.

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5. Closing Comments

This report identified the diverse range of issues that were raised during the West Victoria RFA public consultation process and the viewpoints held by various stakeholder interests on the topic of the Consultation Paper. The Panel has prepared this report for the RFA-SC to consider during its deliberations on the public submissions and their implications for the West Victoria RFA. As an ex officio member of the RFA-SC, the Chair of the Independent Panel will present the report to the RFA-SC for its consideration. The West Victoria RFA is scheduled for completion by 31 March 1999.

The Independent Panel gratefully acknowledges the support and assistance provided by the Executive Officer and Office Manager during the public consultation period.

Appendix One

Brief career biographical details of the West Independent Panel members are set out below.

- *Mrs Christine Forster* (Chair) - has 30 years experience related to the water industry and catchment management, including chairing the Rural Water Commission. She is a member of the Victorian Catchment Management Council and a past Director of the Land and Water Resources Research and Development Corporation. She is a wool grower in Western Victoria and involved in regional development issues. She is a sessional member of the Minister for Planning's independent planning panels.
- *Mr John Henshall* - is the principal of Essential Economics Pty Ltd. He has significant experience in the areas of economic development and the role of small towns and their hinterlands. Approximately 50 per cent of the firm's work is in regional Victoria. John was the lead consultant in preparing the *Small Towns Study* (1988) for the (then) Department of Agriculture and Rural Affairs, a publication still a popular reference in the economics of small town communities.
- *Mrs Alison Teese* - has 28 years experience in rural land use, planning and conservation, served on the Land Conservation Council of Victoria for eight years and is currently serving on the Natural Heritage Trust Advisory Committees & Panels, Australian Landcare Council, Council for Sustainable Vegetation Management, State Assessment Panel for Natural Heritage Trust and Funding Agreements. She chairs the Victorian Bushcare Reference Group. Alison is an agricultural scientist and a partner in a mixed farming property in North-Central Victoria, and a member of the Victorian Catchment Management Council. She is a sessional member of the Minister for Planning's independent planning panels.

Appendix Two: West Victoria RFA Submission List *

Register ID	Prefix	First Name	Last Name	Title	Organisation Name
W001		Laurel	Wilkinson		
W002	Mr	Trevor	Coon		
W003		Jamie	Hutchings		IBIS Dale Pty Ltd
W004		G J	Radley		
W005		R W	DeGruchy		
W006	Ms	Jocelyn M.	Banks	Bellarine Landcare Member	
W007	Ms	Yvonne	Francis		
W008	Mr	Alan	Thow		Northern Logging
W009	Mr	John	Cawthorn		
W010	Ms	Sally	Cole		
W011	Mr	Steve	Holmes		
W012	Ms	Eileen	Colless		
W013	Ms	Sonia	Borg. A.M.		
W014	Dr	R. R.	Vierhout		
W015	Miss	M	Batson		
W016	Mr	Wayne	Margiesow		
W017	Mr	Simon	Beasley		
W018	Mr	Michael	Callahan		
W019		C. R.	Evans		
W020		Pat	Davies		
W021	Mr	Shane	Wilson		
W022	Mr	Peter	Boyd Mercer		Meadowell Farm
W023	Mr	Timothy	Battersby		
W024	Mr	John	Giddins		
W025	Mr	Peter	Kennedy		
W026	Mr	Gavin	Rowe	Director	Bonum Sawmills (Hamilton) Pty Ltd
W027	Mr	Geoff	Kennedy		Habcon
W028		R N	Morrow		
W029	Ms	Anne-Maree	Burgoine		
W030	Mr	Chris	Wheeler		Columbus Logging Company
W031	Mr	Richard	Gilbert	President	Otway Ranges Walking Track Association
W032	Mr	Richard J.	Barlow		
W033		Junnifer M.	Guthrie		
W034		J	Morrow		
W035	Ms	Elizabeth	Wright		
W036	Ms	Marilyn	Lanigan		

* Note that some submissions were marked “confidential” and are not available publicly (see *).

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W037	Mr	Terry	Tucknott	Secretary	Apollo Bay Chamber of Commerce & Tourism Inc.
W038	Mr	Mark	Smith	Executive Officer	Edmund Rice Camps Victoria Inc.
W039		J & M	Hoggan		
W040		L Grimes &	G Ford		
W041		M	Hoggan		
W042		J	Hoggan		
W043	Ms	Sandra	Skene	Honorary Secretary	Australian Labor Party
W044	Ms	Georgette	Courtenay		
W045		M	Hoggan		
W046	Mr	Les	Price		
W047				Environment Officer	La Trobe University SRC Inc.
W048	Miss	Claire	Priestley		
W049	Dr	J. D.	Fenton	Doctor of Architecture (Landscape Architecture)	LANARK
W050		P	Stephen		
W051	Mr	Maurice	Kell	Managing Director	Woodend Produce Store Pty Ltd
W052	Mr	Don	Hansford	Secretary	Midland Axemen's Association Inc.
W053	Ms	Tamara	Muncey		
W054	Ms	Marion	Duncan		
W055	Mrs	Lois	Loftus-Hills		
W056		D. K.	Pilley		
W057	Mr	Graeme R.	Edward	Manager	G. R. Edward Auto Electrical Service Pty Ltd
W058	Mr	Stanley R.	Rodgers	Owner/Manager	Rodgers Bros. Colac Tyre Servcie
W059		John & Lyn	Butt		
W060		Tony & Jan	Nicholls		Green Acres Country House
W061	Ms	Estelle	Kefford		
W062		Ashley	Merrett	Financial Controller	Midway Pty Ltd
W063		Ashley	Merrett		
W064	Mr	Ken	Best		
W065	Mr	John	Bell	President	Geelong Bushwalking Club Inc.
W066	Ms	Peg	Jones		
W067	Mr	Henry	Jaworski	Director	Fowles Timber & Carpet
W068		Shay	Watson		
W069	Mr	Denis	Sheppard		
W070	Mr	Stephen D.	White	Managing Director	King-Smith & Associates Pty Ltd
W071		T. J.	Sharp		
W072a	Mr	Max	Phillips	President	Portland Field Naturalists' Club
W072b	Mr	Max	Phillips	President	Portland Field Naturalists' Club
W073	Mr	John & Jill	Spencer		
W074	Ms	Kris	Reinertsen		Collective Tourist Operators of the Otway Region
W075	Ms	Emma	Koch		
W076	Mr	Shane	Colless		
W077	Mr	Steven	Hunter		
W078	Mr	Jason	Colless		

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W079	Mr	Robert James	Conlan	Director	RJ & MJ Conlan Pty Ltd
W080	Mr	Doug	Toulmin	Manager	Fiery Creek Roadhouse
W081	Ms	Alyson	Whittaker		
W082		Pat	Grainger		
W083	Mr	Anthony	Sabato	Director	Essendon Tile Co. Pty Ltd
W084	Mr	Keith	Davis	Permaculture Design Consultant	The South West Permaculture Group
W085	Ms	Barbara	Sharp		
W086	Mr	Sean	Delaney	Managing Director	Delplant Pty Ltd
W087		L.L. & J. B.	Smith	Proprietors	Kyneton Crane Hire
W088	Mr	John	Card		
W089		A. W & N. M.	Finch		
W090	Mr	John	Spencer	Acting Secretary	Otway Ranges Walking Track Association Inc.
W091	Mr	Stuart	McCallum	Secretary	Friends of Bannockburn Bush
W092	Mr	Kevin	Muller		
W093	Mr	Stewart	Kairn-Haley		
W094	Mr	Greg & Julie	Johnstone		
W095*	Mr	Adam	Rigg		
W096	Mrs	Lois	Phillips		
W097	Mr	Max	Phillips		
W098	Mr	Harold J.	Suckling		
W099	Mr	Ian	McCallum	Hon. President	Casteron Field Naturalists Club
W100	Mr	Kevin J.	Morris		
W101		J. L.	Cleary		
W102	Ms	Linda	Errey		
W103	Mr	Frank	Campbell		
W104	Ms	Madeleine	Goodlet		
W105	Mr	Bruce	Pascoe		
W106	Mr	Richard J.	Lythgo	Principal	Apollo Bay P-12 College
W107	Mr	Brian	Barrett		Kyneton Kompost
W108	Ms	Ronda	Potten	Director	Airtruss Parquetry Flooring Pty Ltd
W109	Mr	Monty	Kirby		
W110		Lee	Kidman		Kidman Furniture Pty Ltd
W111	Mr	Mark	Ennor	Owner/Manager	United Deliveries
W112	Mr	Robert	Martin		
W113	Ms	Elizabeth	Pollock		
W114	Mr	Ralph	Shaw		
W115	Mr	Geoff	Jack	Director	Delta Electrical Distributors
W116	Mr	Peter	Clifton		
W117	Mr	James	Mercer		
W118	Ms	Aileen	Mercer		
W119	Ms	Amanda	Mitchell-Taverner		
W120		Ashley	Merrett	Financial Controller	Midway Pty Ltd
W121		B.	Martello	Victorian Manager	Big River Timbers Pty Ltd

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W122		Amin	Shayan	Managing Director	Pardis Shopfitters Pty Ltd
W123		L & R	Vulcz		
W124	Mr	Michael	Murnane	Chairman	E.T. & E. W. Murnane Pty Ltd
W125a	Ms	Roslyn	Gibson	President	ANGAIR Inc.
W125b	Ms	Roslyn	Gibson	President	ANGAIR Inc.
W126	Mr	Brian	Noordenne	Managing Director	Noordenne Constructions Pty Ltd
W127	Mr	Max	Muir	President South Western Branch	Prospectors and Miners Association of Victoria Inc
W128	Mr	Don	Spence		
W129a	Ms	Jillian	Sainter		
W129aa	Ms	Sandra	Higgins		
W129b	Mr	Brett	Bell		
W129bb	Mr	James	Price		
W129c	Ms	Meredith	Bell		
W129cc	Ms	Trish	O'Reilly		
W129d	Mr	Ray	Bradbury		
W129dd	Ms	Debra	Verras		
W129e	Ms	Sharlene	Abelon		
W129ee	Mr	Gary	Bishop		
W129f	Mr	Christopher	Rimmer		
W129ff	Ms	Katarina	Mrhas		
W129g	Mr	Matthew	Johnson		
W129gg	Mr	Cameron	Gardner		
W129h	Mr	Terry	Hooper		
W129i	Mr	Paul	Dickens		
W129j	Mr	Jon	Stubbs		
W129k	Mr	Robert	Straube		
W129l	Mr	John	Lewis		
W129m	Mr	Robert	Young		
W129n		Joda	Kent		
W129o		L. R.	Phillips		
W129p	Mr	Allan	Jennings		
W129q	Mr	Norman	Lowe		
W129r	Mr	Rob	Van Der Klooster		
W129s	Mr	David	Larsen		
W129t	Mr	Paul	Vatta		
W129u		L.	Garling		
W129v		Adrian	Dillon		
W129w		R.	Shrimpton		
W129x	Mr	Douglas	Miller		
W129y		RM			
W129z	Ms	Natalie	Hughes		
W130a	Mr	Hans	Fankhanel	Secretary	Otway Planning Association Inc.
W130b	Mr	Hans	Fankhanel	Secretary	Otway Planning Association Inc.

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W131	Mrs	Wendy	Hebbard		
W132	Mr	John	Slorach	Manager	Central Victorian Forestry Company Pty Ltd
W133		P	Cobham	Technical Manager	Koppers-Hickson Timber Production
W134	Mr	David	Humphrey		
W135	Ms	Lorraine	Kelleton		
W136a	Mr	David	Colless	Director	Calco Timbers Pty Ltd
W136b	Mr	David	Colless	Director	Calco Timbers Pty Ltd
W137	Mr	Bruce	Anderson		Anderson Fitting & Maintenance
W138		D & P. M.	Saul		
W139	Ms	Robyn	Beard		
W140	Dr	Nigel	Strauss	Consultant & Occupational Psychiatrist	Nigel Strauss Pty Ltd
W141		K. H.	Carlton		
W142		R	Owen		
W143		H	Cant read surname.		
W144		K.	Murphy		
W145		R	Verhagn		
W146	Ms	Simone	Murray		
W147	Mr	Dale	Tiley		Mt Cole Logging Co Pty Ltd
W148		Jon	Onley	Manager	Onleys Holdings Pty LTD
W149	Ms	Deborah	Baillie		
W150		William & Valerie	Dykstra		
W151	Mr	Simon	Allen	Managing Director	G.A.M. Steel Pty Ltd
W152	Mr	Tim	Laurie		TGL Consulting Pty Ltd
W153	Mr	Graeme	Drysdale		
W154	Mr	John	Belani	Managing Director	John Belani Pty Ltd
W155		A. D.	Cran	Managing Director	Cran Camerons
W156	Ms	Sharon	Turner		
W157	Mr	Tom	Tootell		
W158	Mr	Ian	Schulz	Sawmill Instructor	Victorian Timber Industry Training Centre
W159	Mr	Graham F.	Mee		
W160a	Mr	David	Munro	President	Hamilton Field Naturalists Club
W160b	Mr	David	Munro	President	Hamilton Field Naturalists Club
W161a	Ms	Jean	Philipps		
W161b	Ms	Jean	Philipps		
W162	Mr	Stephen	Dingwall	President	Prospectors & Miners Association of Victoria Inc
W163	Ms	Margaret	MacDonald	Honorary Secretary	Friends of Angahook Lorne State Park
W164a*	Mr	Gordon	Pritchard	Director	Pritchard Logging Pty Ltd
W164b*	Mr	Gordon	Pritchard	Director	Pritchard Logging Pty Ltd
W165a	Mr	Bruce	Fletcher		
W165b	Mr	Bruce	Fletcher		
W166	The Hon	Roger M	Hallam, MLC	Shadow Minister for Finance & Gaming	
W167		Pauline & Hugh	Burton	Pyrette Project	Bullengarook Landcare Group
W168	Ms	Serena	O'Meley	Spokesperson	Geelong Community Forum Inc

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W169	Mr	Gavan	McFadzean	Victorian Campaign Coordinator	The Wilderness Society
W170	Ms	Kersten	Gentle	Victorian State Coordinator	Timber Communities Australia
W171	Mr	Donald A	Forsyth	Chief Executive Officer	Corangamite Catchment Management Authority
W172	Mr	Greg B	Morgan		
W173	Mr	Alan	Griffiths		
W174		David & Carole	Webley		
W175a	Mr	B	McDonald	Resources Chairman	VAA Inc
W175b	Mr	B	McDonald	Resources Chairman	VAA Inc
W176	Mr	Wolf D.	Passauer		
W177	Mr	Peter	O'Mara	Community Liasion Officer	Wombat Forest Society
W178	Mr	Richard	Hill	Project Officer	Birds Australia
W179	Mrs	J	Forrester	President	Friends of Otway national Park
W180	Ms	Belinda	Murnane	Coordinator	Otway Forest Industries Info Group
W181	Ms	Kim	Stanley-Eyles		Enfield Forest Alliance
W182	Cr	Noel	Harvey	President	Timber Towns Victoria
W183	Ms	Jenny	Barnett	Research Officer	Victorian National Parks Association Inc.
W184	Cr.	Julie	Hansen	Mayor	Surf Coast Shire
W185		Delys Henshaw &	Joan Lindros		Geelong Environment Council Inc.
W186	Mr	Geoff	Beilby		
W187	Dr	Michael	Axtens		
W188	Ms	Rosemarie	Aharon	Secretary	West Victorian Land Management Alliance
W189a	Ms	Sophia	DiVenito		
W189b	Ms	Kim	Wilson		
W189c	Ms	Estelle	Kefford		
W189d		Tom Crook &	Svea Pitman		
W190	Ms	Julie	Yates		
W191	Mr	Owen	Ellemor		
W192		Frits	Wilmink		
W193	Ms	Lynn	Brown		
W194	Mr	Stephen L.	Hart		
W195	Ms	Ruth	Graney		
W196	Mr	Steve	Martinich		
W197	Mr	Peter	Bennett		
W198	Ms	Joan	Humphrys		
W199		Cliff & Mae	Ashworth		
W200	Ms	Lyndal	Waters		
W201	Ms	Lucinda	Douglass		
W202		S	Bizards	Director	Outlook Homes P/L
W203	Mrs	Lynn	Akeroyd		
W204	Mr	Vic	Zurek		Australian Motorcycle Tours
W205		Vlad	Philipovski		c/- Oberon High School
W206	Ms	Gracie	Adamson		
W207	Ms	Louise	King		

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W208	Mr	John	Mitchell		
W209	Ms	Leigh	Adamson		
W210	Ms	Laurie	Crouch		
W211	Mr	John P.	Donahue		
W212		R, S & J	Mundy		
W213	The Hon	Roger M	Hallam, MLC		
W214	Ms	Carlie	Gray		
W215		J T	Kittson		
W217	Mr	Maxwell James	Galpin		
W218	Mr	Anthony	Jones		
W219	Ms	Margaret	MacDonald		
W220		Ivor	Graney		
W221	Mr	Rod	Deering		
W222	Mrs	Lyn	Langdon & Family		
W223	Ms	Rosemarie	Stoeckli		
W224	Mr	Keith	McAlley		
W225	Ms	Judy	Lau		
W226	Mr	Mark	Trengrove		
W227		Robin	Bradley		Hunter Agencies
W228	Mrs	Mary	Watt		
W229	Mrs	Mary	Watt		
W230	Mr	Frank L	Rauch		
W231	Mr	Neil A	Blundy		
W232	Ms	Kaye	Harris		
W233	Mr	Ricky Roy	McNeil		
W234	Mr	David	Butt		
W235	Mr	Jamie	Antonio		
W236a	Mr	Graeme	Gooding	Executive Director	Victorian Association of Forest Industries
W236b	Mr	Graeme	Gooding	Executive Director	Victorian Association of Forest Industries
W237	Ms	Wilma	Tiley		
W238	Ms	Kristen	Lees		
W239	Mrs	Sue	Martin		
W240	Mr	Chris	Belcher		
W241	Mr	Doug	Watson		
W242	Mr	Len	Thow		
W243	Mr	Rodney	Spargo	Operations Manager	Graeme Spargo Transport Pty Ltd
W244	Ms	Rosemary	Faris		
W245	Dr	M. M.	Maddern		
W246	Ms	Alison	Hetherington		
W247	Ms	Amy	Epstein		
W248	Ms	Mariam	Scarlett		
W249	Dr	Lisa	Jackson		
W249a	Dr	Lisa	Jackson		

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W250	Mr	Andrew	Gemmell		
W251	Mr	Graeme	White	Chairman	Golden Forest Network
W251a	Mr	Graeme F	Cock	Chief Executive Officer	FIAA
W251b	Mr	Graeme F	Cock	Chief Executive Officer	FIAA
W252		Lee	O'Hara		
W253	Mr	K V	Shade	Chief Executive Officer	Horsham Rural City Council
W254		Wal & Ruth	Jenkyn		
W255	Ms	Jennifer	Mitchell		Keep the Wakes of the Cumberland Campaign
W256a	Ms	Carol	Wilmink		
W256b	Ms	Carol	Wilmink		
W257*	Mr	Ian	Crick	Director	Crick Bros Sawmills Pty Ltd
W258a	Mr	Stephen G	Cornish	Chief Executive Officer	Pyrenees Shire
W258b	Mr	Stephen G	Cornish	Chief Executive Officer	Pyrenees Shire
W259	Mr	Mark K	Roberts	Group Manager	Macedon Ranges Shire Council
W260a	Ms	Diane	Tregoning	General Manager	Black Forest Timbers Pty Ltd
W260b	Ms	Diane	Tregoning	General Manager	Black Forest Timbers Pty Ltd
W261	Ms	Geraldine	Ryan		Environment Victoria Inc
W262	Mr	John	Endacott		WFS Committee
W263	Mr	Mark	Cowie	Spokesperson	Actively Conserving Trentham
W264	Mr	Roger	Hardley		Apollo Bay Landcare Group
W265 (part a*)	Mr	Greg	McCormack	Chairman	Midway Pty Ltd
W266	Mr	Michael	Fox		Werribee Catchment Management
W267	Mr	Joe	Chatfield	Regional Coordinator	South West and Wimmera Cultural Heritage
W268	Mr	Simon	Birrell		Otway Ranges Environment Network
W269	Ms	Lesley	Jackson	Secretary	Australian Labor Party
W270	Mr	Carsten	Nannestad	Chief Executive Officer	North Central Catchment Management Authority
W271		Can't Understand Writing.			Eureka Timber
W272	Ms	Svea	Pitman		
W273	Mr	Russell	Worland	Chief Executive Officer	South West Water Authority
W274	Ms	Judith	Adams		
W275	Mr	David	Finn		Otway Forum
W276	Mr	Graeme	Eadie		
W277		W. J.	Lane		
W278	Mr	Russell K.	Wills		
W279	Mr	Ross	Ebbels	Chairman	Geelong Otway Tourism
W280	Mr	Steven	Lawson		
W281	Ms	Joyce	Leigh		
W282	Ms	Patricia	Prenderghst		
W283	Mr	Chris	Hargreaves		
W284	Mr	George	Malliaros		
W285a	Mr	David	Folkes		
W285b	Mr	Dennis	Clalk		
W285c	Mr	Norman Leonard	Preston		

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W285d	Mr	Colin	Harman		
W285e		Susan & Terrence	Rowbottom		
W285f	Mr	Christopher F.	Mink		
W285g	Mr	John David	Hogham		
W285h	Mr	Ian	Leithhead		
W285i	Mr	Brad	Manders		
W285j	Mr	John	Rogers		
W285k	Mr	Donald J	McArthur		
W285l	Mr	Gregory R	McAdam		
W285m	Mr	Murray	Harman		
W285n	Mr	Maxwell John	Claret		
W285o	Mr	Arthur W.	Smith		
W285p	Mr	Michael	Coutts		
W285q	Mr	Doug	Schmielt		
W285r	Mr	Ronald	Ramsay		
W285s	Mr	Dennis	Clalk		
W285t	Mr	Glen	Gray		The Sawnbank Joinery
W286	Mr	Jim	Dugan		Dwyer's Sawmill
W287a	Mr	Michael	Salamito	Director	Custom Saws Pty Ltd
W287b	Mr	Adrian	Trigg	Manager	Custom Saws Pty Ltd
W287c	Mr	James	Ledingham	Sales Representative	Custom Saws Pty Ltd
W287d	Ms	Carmel	Perry	Administration	Custom Saws Pty Ltd
W287e	Mr	Geoff	Pyke	Transport Manager	Custom Saws Pty Ltd
W288	Ms	Jude	Graeneveld		
W289	Mr	Dan	McCarthy	Manager	Macedon Ranges Electric
W290	Mr	Douglas	Dean		
W291		Pat	Shannon		
W292a	Mr	Dennis N	Williamson	Director	Scenic Spectrums Pty Ltd
W292b	Mr	Dennis N	Williamson	Director	Scenic Spectrum
W292c	Mr	Dennis N	Williamson	Director	Scenic Spectrum
W293	Mr	Mike	Kibblewhite		
W294	Mrs	Lesley	Lane		
W295	Ms	E	Sommerville		
W296		E	Balington		
W297	Ms	Sara	Quast		
W298	Ms	Heather	Martin		
W299aa	Mr	Haydn	Barclay		
W299bb	Mr	Charlie	Boyle		
W299cc	Ms	Melanie	Nielebock		
W299dd	Mrs	Lee-Anne	Gerber		
W299ee	Mr	Gavin D	Winwood		
W299g		R	Wright		
W299h		G	Davis		

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W299i		Frans	Sevenich		
W299j		D	Carew		
W299k	Ms	Delia	Mumby		
W299l	Mr	Greg	Knight		
W299m	Mr	Craig	Holster		
W299n	Mr	Terry	Perkins		
W299o	Mr	Darren	Phillips		
W299p	Mr	Theodore	Gerbor		
W299q	Mr	Gerarr	Rutter		
W299r	Mr	Malcolm	Lacey		
W299s		B	Donoghue		
W299t		A	Grinhan		
W299u	Mr	Shane	Muir		
W299v		R E	Schmitt		
W299w	Mrs	Lee-Anne	Gerber		
W299x	Mrs	Lee_anne	Gerber		
W299y	Mr	Alan	Simmins		
W299z	Mr	Steven	Jones		
W300	Mr	Ivor	Johnson	Owner	Johnson's Liquor Pty Ltd
W301	Mr	Brian	Barrett		Kyneton Kompost
W302	Mr	Rodney	Spargo	Operations Manager	Graeme Spargo Transport Pty Ltd
W303		Jesse E & Donald G	Smith		
W304	Ms	Annette	Molloy		
W305	Mr	George	Molloy		
W306	Ms	Cornelia Elbrecht	Bill Whittakers		Claerwen Retreat
W307		L	Stewart	Managing Director	L & V Stewart Pty Ltd
W308	Mrs	Lois	Loftus-Hills		
W309	Mr	Ken	Douglas		Bolwarra Lodge
W310	Mrs	Jane	Hayes		
W311		Max & Rosemary	Myers		
W312	Ms	Michel	Beuchat		
W313	Mr	Gordo	McIntyre		
W314		Puian	Khamberg		
W315		E J	Wright		
W316	Mr	Rod	Oaten		
W317		No Name.			Roscoe's Timber, Hardware & Gardens Supplies
W318	Mr	John	Venturoni		Venturoni Bros Pty Ltd
W319	Mr	Richard Lay	Geoff Logan		
W320	Ms	Lila M	Bridge		
W321		D D & A A	Davey		
W322a	Mr	Peter	Vickery	QC	Peter N Vickery QC
W322b	Mr	Peter	Vickery	QC	Peter N Vickery QC
W323	Ms	Margaret	Holmes		

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W324	Ms	Dorothy	Sutherland		
W325	Mr	Stephen	Chenery		
W326a	Mr	John	Ellis	Chairman	Macedon Ranges & Spa Country
W326b	Mr	John	Ellis	Chairman	Macedon Ranges & Spa Country
W327	Mr	Rob	Davis	Manager Strategic Development	Colac Otway Shire
W328	Mr	Stuart H	Bennett	Director	W H Bennett & Sons Pty Ltd
W329		E J	Gardener		
W330		C D & L A	Bastecky		
W331	Mr	Michael	O'Connor		Construction, Forestry, Mining Energy Union
W332	Mr	Bill	Peel		
W333	Mr	Alan	Barker	Managing Director	Daylesford Sawmill Group
W334	Mr	Alexander	Chapman	Conservation Convenor	Melbourne University Mountaineering Club
W335	Ms	Juliet	Le Feuvre		
W336	Mr	James	Fitzsimons		Environmental Management
W337	Mrs	Margaret	Thorpe		
W338	Dr	John	Douglas		
W339		Pip	Cassidy		
W339a		Erin	Buckland		
W339b	Mr	Mitch	Johnson		
W339c	Mr	Paul	Carson		
W339d	Mr	Nathan	Hart		
W339e	Mr	Troy	Schulze		
W339f	Ms	Kate E	Lee		
W339g		Cant Read.			
W339h	Ms	Patricia	Hose		
W339i		N J	Bryant		
W339j		No Name			
W339k		No Name			
W339l	Mr	Anthony	Hubh		
W340	Ms	Ruth S	Bryce		
W341	Mr	Desmond	Muir		
W342	Mr	Daryl	Babington		
W343	Ms	Jenny	No surname.		
W344	Mr	Chris	Trueman	Managing Director	Southbank Apartments
W345	Ms	Hayley	Shields		
W346		No Name			Likely Prospects
W347	Ms	Anna	Kivley		
W348		J	Gray	Secretary	Stawell Field Naturalists' Club
W349	Ms	Jane	Marriott		
W350	Mr	Keith	Shalders		
W351	Mr	Jeff	Blake		
W352	Mr	Peter K	Tiley		
W353		M	Schneider		

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W354	Mr	Philip	Avery		
W355	Ms	Emma	Theiler		Top Down Tours
W356	Ms	Christine	Williams		
W357	Mr	Kevin M	Clarke		
W358	Ms	Joan	Pitley		
W359	Ms	Ann	Jacobs		
W360	Mr	Don	Borthwick	Company Director	A Borthwick & Sons Pty Ltd
W361	Ms	Joan	Lynn		
W362		Jenni & Gerald	Kamp		
W363	Ms	Julie	Riley		
W364		Valda	Dedman		
W365		G L	Jarratt		
W366	Mr	Antonio	Maurici		
W367	Mr	Julian Flack	Helen Chambers	Owners	Johanna River Farm and Cottages
W368	Mr	John	Allen		Fairhaven Family Holiday Park
W369	Mr	Marlin	Eberle		
W370		Graham & Erin	Scott		G & E Scott Logging
W371	Mr	Graeme	Tribe		
W372		A	Witcombe		
W373	Mr	Neil	Tucker		
W374	Mrs	V	Piorser		
W375		Trevor & Beryl	Blake		
W376	Ms	Dorothy	Trezise		
W377	Ms	Melissa	Eliott		
W378		W N & S M	Scheiner		
W379	Mr	Noel R	Williams		
W380	Mr	Carl	Campbell	Factory Manager	Custom Saws (Aust.) Pty Ltd
W381		Cant Read.			
W382		Pamela & R P	Knight		
W383	Mrs	Jennifer	Tiglias		
W384		Jean	Leitinger		
W385	Mr	Steve	Waters		
W386	Mr	Adam	Smith		
W387	Mr	David A	Thomas	Managing Director	David A Thomas Insurance Brokers Pty Ltd
W388	Mr	Philip	Cohn		
W389	Ms	Helen	Kidson		
W390	Mr	Dale	Tiley		Mt. Cole Logging Co Pty Ltd
W391	Mr	Malcolm	McDougall		
W392	Ms	Emma	Balkin		
W393	Mr	Peter	Growney		Glaneuse Studios
W394	Mr	Ian	McPherion		
W395a	Ms	Jenny	Barnett	Research Officer	Victorian National Parks Association Inc.
W395b	Ms	Jenny	Barnett	Research Officer	Victorian National Parks Association Inc.

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W397a	Mr	Jim	Radford		Landscape Ecology Research Group, Deakin Uni.
W397b		Jim & Sue-Ellen	Radford		
W398a	Ms	Kaaren	Shimana		
W398b		Surya	Shimana		
W399a	Mr	Ralph	Bartlett		
W399b	Ms	Norma	Bartlett		
W399c	Ms	Jillian	Bartlett		
W400		Grollo	Homes		Grollo Homes
W401	Mr	R	Zakharov		
W402	Ms	Danielle	Corbett		
W403	Ms	Annie	Pyers		
W404	Mr	Jason	Hiscock		
W405	Ms	Beth	Lesbed		
W406		S S	Parker		
W407	Ms	Yvette	Hargreaves		
W408	Mr	Jason	Phieler		
W409	Mr	Brian	Kuster		
W410	Mr	Jason	Wood	Maintenance Supervisor	Midway Pty Ltd
W411	Mr	David	Pilley		
W412		L D & B J	Leavesley		
W413		Jannen	Samuel		
W414		Wenda	Grant		
W415	Ms	Kerrie	Norris		
W416	Ms	Juliette	Milbank		
W417	Mr	Daryl	Harrison		
W418	Ms	Katrina	Haas		
W419	Ms	Dianne Jones	John Ellis		
W420	Mr	Ian	McPherson		
W421		K B	Downey		
W422	Ms	Glenda	Shomaly		
W423		Petition Submission			
W424	Mr	Keith	Wiltshire		
W425	Mr	Trevor	Attwood		
W426		W	Dixon		
W427	Mr	John R	Murphy		
W428		J	McGinness-Whyte		
W429	Mr	Keith	Vagg		
W430	Mr	Tony	Hastings		
W431	Mrs	Margaret	Joyce		
W432	Mrs	Judith	Eckstein		
W433		E.	O'Meley		
W434	Ms	Simone B M	Siracusa		
W435	Mrs	Anne	Saunders		

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W436	Mr	Anthony Fuery	Neri Brown		
W437		H L	Kruger		
W438	Mr	David	Rimmer	President	VicWalk
W439	Mr	Gerald	McDonald		Mount Eliza Association For Environmental Care
W440	Ms	Suzanne	Birch		
W441	Mr	Colin M	Bamford		Colin Bamford & Co Pty Ltd
W442	Dr	G S K	Goodman	Psychologist	Not Supplied.
W443a	Mr	Paul	Higons		
W443b		Aoam	Deacon		
W443c	Mr	Paul	Ormrod		
W443d	Ms	Sally	Hunt		
W443e	Mr	Stephen	Draper		
W443f	Ms	Jenny	Higgins		
W443g	Ms	Libby	Meaden		
W443h	Ms	Pamela	Ormrod		
W443i	Ms	Melissa	Pleysier		
W444		Leo & Lee	Stauber-Ferris		
W445	Mr	Paul	Caine		Glen Eira Environment Group
W446	Mr	Eicke	Breuer		
W447	Mr	Howard B.	Short		
W448	Ms	Renea	Forsyth	Secretary	Lorne Business and Tourism Association
W449		M	Hegedus	Director	M & M Hegedus Pty Ltd
W450	Ms	Sue	Close		
W451	Ms	Amy	Cohn		
W452	Ms	Lynne-Maree	Parker		
W453	Mr	Gavin S	Parker		
W454		L	Cordes		
W455	Mr	Gordon	Middleton		
W456	Ms	Susan	McInnes		
W457	Ms	Marie	Latham		
W458		Alida M	Mayer		
W459	Mr	Charles	Brooks		
W460	Ms	Claire Dalman	Patricia Murphy	President/Secretary	Field Naturalists Club of Ballarat Inc
W461	Mr	Chris	Gillard	Chief Executive Officer	Moorabool Shire Council
W462		W G	Falkenberg	Western Region Manager	Victorian Apiarists Association
W463	Ms	Helen	Phillips		
W464	Ms	Hazel	Morris		
W465	Mr	Bruce	RDE Roffingnoc		
W466		No Name.			
W467	Rev	Sherryl	Smith		
W468		M & H Rowsell	G Rethus		
W469	Ms	Isabel G	Young		
W470		Petition Submission			

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W471	Ms	Sue	Mudford	Watershed 2000	Land Protection Association
W472	Ms	Kim	Stanley-Eyles		Enfield Forest Alliance
W473		Bill & Hennie	Neve	President & Secretary	Bird Observers Club of Australia
W474	Ms	Helen	Jordan		
W475	Ms	Vyvyan	Cayley		
W476	Ms	Christine	Hebb		
W477	Ms	Rhonda	Summers		
W478	Mr	Graham	Connell		
W479	Mr	Roy	Latham		
W480	Ms	Sharon	Brink		
W481	Dr	Eva	Van Ammers		
W482	Mrs	Cynthia	Breuer		
W483	Mr	C	Wallace		
W484		Adam	Casey		
W485		Ian	McPherson		
W486		Kevin	O'Shanassy		
W487		Peter	Condon		
W488		Petition Submission			
W489		Andrew	Cantrill	General Manager	Jondod Sales Pty Ltd
W490	Mr	R	Semmens		
W491		David	Horris		
W492		Jayne	D'Arcy		
W493		John	Quick		
W494		Andrew	Cook		
W495		G	Theile	Secretary	Bendigo Alpine Club Inc
W496		John	McArthur		
W497		Mary	Dixon		
W498		Frank	Pederick		
W499		Graeme	Spiller	State Sales Manager, Flooring Division	G.P. Embelton & Co. Pty Ltd
W501		Pat, Stefan, Maye & Justine	Carey		
W502		Elizabeth	Robins		
W503		Stephanie	Fliegner		
W504		Glynis, Rowland, Cary & Rory	Lampitt		
W505		Joan	MacMahon		
W506a		D J	McQueen		
W506b		D J	McQueen		
W507	Ms	Nola	Wilmot		
W508		P G	Kirkbride		
W509		Clare	Ryan		
W510		Bill	Gulding		
W511	Mrs	J	Calaby		
W512		Russell	Finn		
W513	Mrs	Claire	Dalman		

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W514		Diana	Primrose		
W515		G M	Proctor		
W516		Geoffrey R	Price		
W517		M & A	Cohn		
W518		Rosalind	Byass		
W519		N & J	Gray		
W520		Anne	Hughes		St Arnaud Field Naturlists Club
W521		Emily	Lippelgoes		
W522		Keryn	Yuill		
W523		Marcel Hoog	Antink		
W524		Louise	Byrne		
W525		Bronwyn	Mibus		
W526		Helen	Stannard-Williams		Bannockburn Natural Health Care Clinic
W527	Dr	Babara	Baird		
W528		Maureen	Ross		
W529		Gary	McIntosh		
W530		David	Smith		Daylesford Neighbourhood House
W531		Robert	Barber		Glenisla Homestead
W532		Penny E.	Forth		
W533		Adam	Close		
W534		Doug	Goodwin		
W535		Rita M.	Hanly		
W536		Tina	Van Wisper		
W537		Rosemarie	Aharon	Secretary	West Victorian Land Management Alliance
W538		Truce	Hayes		
W539		Andre	Den Elzen		
W540		Brett	Hedger		
W541		Russell	Irving		
W542		Ian	Whitford		
W543		Andy	Breaden		
W544		Ian	McPherson		
W545		Beth Gardiner	Andrew Buchanan		
W546		Anthony	Tibbits		
W547		Patricia	Cliford		
W548		No Name.			
W549		John & Joanne	Ryan		
W550	Ms	Kay	Schapper		
W551a		Jan Testro	Julie Drysdale		
W552	Ms	Andrea	Marian		
W553		Sandra	Jennings	Concerned Australian Citizen	
W554		Heather	Richardson		
W555		Anton & Eja	Tibbet		
W556		D R	Hughes		

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W557	Miss	Dianne	Morrison		
W558		John	Treloar	Senior Contracts Engineer	Windsor Kilns Pty Ltd
W558a		John	Vogels, MLA		
W558b		John	Vogels, MLA		
W559		Maurice	Alexander	President	Barwon Heads
W559a		Graham	Biggs	Managing Director	GB Fasteners
W560		Robert	Stephen		
W561a		Chris	Dare	Residual Wood Supply Manager	Midway Lty Ltd
W561b		Andrew	Lynch		Midway Pty Ltd
W562b		Anne	O'Mullane		
W563		Andrew	Hack		
W564		David	Pollock		
W565	Mrs	M D	Webb		
W565a		Anne	O'Mullane		
W566		Hugh	Delahunty	Member for Wimmera	Hugh Delahunty MLA
W567		Marianne	Renee		
W568		D & J	Campbell		
W569		Jean H	Lucas		
W570		R S	Lucas		
W571		Emma	Homes		
W572		Philip	Arnold		Sea View Lodge
W573		Carolyn	Tatchell		
W574		Cate	Cousland		
W575		Jan C	McConnell		
W576		Raymond	Wittenberg		
W577		No Name.		Secretary	Great Dividing Trail Assoc.
W578		Tara	Griffiths		
W579	Dr	Debbie	Stach		
W580		No Name			
W581	Ms	Gail	Palmer		
W582		Petar	Popovie		
W583		Tim	Rowley		
W584		No Name.		President - Mammal Survey Group	The Bendigo Field Naturalists Club
W585		Greg	Thompson		
W586		Amy O'Brien	Amy Lehmann		Students for Sustainability Club
W587		Margaret	Laurence		
W588		No Name.			Brebner & Associates Financial Planning
W589		Lisa & Michael	Anderson		
W590		Barry	Lingham	President	Geelong Field Naturalists Club
W591	Mrs	Jean	Ryan		
W592		No Name.			
W593		Carolyn & Basil	McKinley		
W594	Dr	Peter	Vuillermin		

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W595		Anthony Bruce	Walgott		
W596		Keith T.	Hunter		
W597		Paul	Rose		
W598		R	Shoebridge		
W599		Doug	Webb		
W600	Mr	Gregory	Binns		
W601		Kareen J	Fletcher		
W602		Henny	Cowdey		
W603		Andrew	Burnham		
W604		Geoff & Julie	Grante		
W605a		Delys	Henshaw		
W605b		Delys	Henshaw		
W606		Max & Shirley	Galpin		
W607		Merv	Membrey		Valcat Pty Ltd
W608	Dr	Margaret	Beavis		
W609		Felicity	Faris	Victorian Coordinator	Threatened Species Network
W610		Michael	Corrigan		
W611		Michael	Jones		Agmek Ballarat Pty Ltd
W612		Bernard	Griffin		Bridgeswade
W613		Robert	Dolan	General Manager	Ballarat Industrial Supplies Pty Ltd
W614		John	Patterson	Sales Manager	Elgas
W615		Glenn	Button		
W616		Kay	Aldridge		
W617		Nadine	Liddy		
W618		Wendy	Haberecht		
W619		Lyn	Munro		
W620	Mr	Michael	Wernik		
W621		Cherree	Densley		
W622		Ian & Beatrice	McKay		
W623		Rosemary	Friscic		
W624	Mrs	Meg	Rush		
W625		Fiona	Nelson		
W626		Clare & Peter	Averill		
W627		Z	Reilly		
W628		Jennifer	Mitchell		
W629		Mandy	Green		
W630		Louise	Shepherd		
W631	Dr	Rod	Sutherland	Convenor	Mount Arapiles-Tooan State Park Advisory Committee
W632		Jane	Williams		
W633		Lucy	Maddox		
W634		Andrew	Bradey		
W635		Rosalind	Bradey		

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W636		D	Belfield		
W637		Peter	Reeve	Director Services Planning	Moyne Shire Council
W638		Jodie	Deneka		
W639		Veronica	Phillips		
W640		Rosemary	Nugent		
W641		Steve	Roffey		
W642		Theresa	Cole		
W643		Premila	Canagaratna		
W644		A & D	McGain		
W645	Mrs	M	Turner	Secretary	Wannon Conservation Society
W646		Kirsten	Saunders		
W647		Margaret	Waspe		
W648	Mr	Kevin	Rush		
W649		Don	Ramsay		
W650		M A	Callanan		
W651		Bruce, Chris, Klarissa & Sam	Farley		
W652		Colin G	Smith		
W653		Dale	Baulch		
W654		Peter & Chris	Baird		
W655		Coral	Kenwood		
W656		Rohan	Murfett		
W657		Toby	Eccles		
W658		Terry	Gunn		
W659		Mark	Mathieson		
W660		Janet	Bachlious		
W661		Debbie	Membrey		
W662		Kevin	Barker		
W663		Ricky	Johnstone		
W664		Lindsay A	Merritt	Chief Executive	Warrnambool City Council
W665		L N	Cole		
W666		Clare M	Ridsdale		
W667		Alister & Kathleen	Sholl		
W668		Rowan & Lorraine	O'Brien		
W669		Garry	Price		
W670		Veronica	Mahoney		
W671		D	Haywood		
W672		Laurie	Niven	President	The Victorian Orienteering Association Inc.
W673		Gordon	Christie		
W674		Christine	Hutton		
W675		Eva, Wacek & Natalia	Kowaczlyk		
W676		Eleanor	Butt		
W677		Laurence J	Living		
W678		Joanne	Hawrylak		

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W679		Anne	Gibson		
W680		Jacqueline	Wallis		
W681		Peter	Homan		
W682		Jon Rowdon	Gayle Chappell	Directors	Zoomorphic
W683		Zoe	Wilson	Club Manager	Bird Reserves Club of Australia
W684		J	Pitaro		
W685		George	Ralph		
W686		Len	Gloster	Proprietor	Gloster Nissan
W687		Judith	Dunn		
W688		Helen A	Laghy		
W689		Mark	Costello		
W690		Paul	Shea		
W691		Simone	Merrett		
W692	Ms	Karen	Joy		
W693		R K & J M	Simmonds		
W694		Mary	Wallace		
W695		Michael J	Armytage		
W696		Patrick	Witton		
W697		Ric	Wallis		
W698		Joan	Maxwell		
W699		Jim	Selwood		
W700		Saskia	Bertram		
W701		M	Guiney		
W702a		Bianca G	Giudici		
W702b		Phyllis D	Castle		
W702c		Roy	Carson		
W702d		Don	Gowan		
W702e		Alison L	Baker		
W702f		Jean	Carr		
W703		Iris	Loughnan		
W704		Marilyn	McInnes		
W705		Neil	Organ	Proprietor	Organ's Bus Service Pty Ltd
W706		Lisa	den Elzen		
W707		Fiona	Wood		
W708	Mrs	Wendy	Swaine		
W709		P & T	O'Donnell		
W710		P A	Ball		
W711		Jennifer & John	Poliness		
W712		Valerie	Warner		
W713		Robert	O'Brien		
W714		Sue	Madford		
W715		Petition Submission			
W716		Sylvia Kim	Andersen		

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W717	Harold	Cockwell		
W718	Maurice	Alexander	President	Barwon Heads Association Inc.
W719	Anne-Marie	Malesic		
W720	Mary Ann	Cohn		
W721	Carl	Finlay		
W722	C J	Fraser	Executive Director	Victorian Chamber of Mines Inc.
W723	Kate	Noble		
W724	Gillian	Blair	Secretary	SWEAG
W725a	Guy	Seehusen		
W725b	Ned	Seehusen		
W726	Magaret	Seehun		
W727	Teresa	Price		
W728	Per	Kaartinen		
W729	Dorothy M	Konig		
W730	Alan	Crute	Director	Denis Crute Pty Ltd
W731	Marina	Lewis		
W732	Rob	Small	General Manager, Environmental & Rec. Services	City of Greatery Geelong
W733	Geoff	Strang	President	Prospectors and Miners Association of Victoria Inc
W734	June	Ryan		
W735a	Christopher	Corrigan		
W735b	Eileen M	Corrigan		
W735c	John	Corrigan		
W736	Simon	Mims		
W737	Catherine	Jones		
W738	Robyn	Hodge		
W739	Thomas	Lindsey	Chairman	South West Sustainability Partnership
W740	Jane	Gross		
W741	Zed	Romme		R J Rowle Pty Ltd
W742	Roy	Reekie	Branch Secretary	Australian Labor Party, Warrnambool Branch
W743	William	Jones, OAM		
W744	Anthony	Amis		Friends of the Earth Frst Network & Rec. Fisherman
W745	Simon	Birrell		Otway Ranges Environment Network
W746	Ian	Hamilton	President	Public Land Council of Victoria Inc.
W747	James	Todd		
W748	Sally-Anne	Brown		
W749	L Andrew	Walker		
W750	Bob	Wuestewald		Bob Wuestewald Electrical Contractor
W751	D. J.	Molloy		Molloy, Orr & Ronan - Chartered Accountants
W752	Franceska	Deyelak		
W753	Danila	Craddock		
W754	Celia H	Smith		

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W755		No Name.				Michael Williams & Associates Pty Ltd
W756		Karen	Batt	Branch Secretary		CPSU
W757		Ian R	Mc Cann			
W758		Penny	Forth			
W759		Sabrina	Lethbridge			
W760		Gloria	Smith-Tappe			
W761		Shirley	Duffield	Secretary		Warrnambool Fild Naturalists Club
W762		Robyn	Richmond	Secretary		Otway Scenic Circle Association Inc.
W763		Catherine	Jones			
W764		No Name				Corsair Sustainable Timbers Pty Ltd
W765		Gurm	Sekhon	State Convenor		The Australian Greens Victoria
W766		M	Feldmuller			
W767		Jennifer	Duke			
W768		Gabrielle	Watt			
W769		Ken	Harris			
W770		Sally	Forbes			
W771		Ken	Blackman			
W772		Kerry	Simmonds			
W773		Joan	Kenwood	President		Queenscliffe Community Assoc. Inc.
W774		No Name.				
W775		Steven	No Surname			
W776	Mrs	Coralie	Coulson			
W778	Dr	Raelene	Mibus			
W779		Jim	Radford			
W780		Lianty	Bryce			
W781		Natalie	Smith	Conservation Coordinator		The Field Naturalists Club of Victoria Inc
W782		Mark	Scida			
W783		Teresa	Hicks			
W784		Belinda	Bradley			
W785		John	Hathurson	Conservation Officer		S W Region F & G Aust
W786		Nola	Gunning			
W787		Philip & Mary	Cox			
W788		Amanda	Peny-Bolt			
W789	Mrs	Catherine	Parks			
W790	Ms	Nanette	George			
W791		Kelly & Glen	Brooks-MacMillan			
W792		Paul	Jones			
W793		Paul	O'Connor			
W794		Charlie	Pascoe			
W795		Darren	Ferrier			
W796		Charlotte	Roseby			
W797		A L	Chalmers, OAM			
W798		Helen	Castle			

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W799		Gloria	Freeman		
W800		Sally	Hazeldine		
W801	Mrs	Vera O	Williamson		
W802		Jane & Rick	Begg		
W803		Nic	McCaffrey	Bush Regeneration Advisor	Mount Eliza Association For Environmental Care Inc
W804		Sally W & Sophie K	Grove		
W805		Rodney	Peers		
W806		Fiona	Hallam		
W807		Natasha	Moore		
W808		Mandi	Scott		
W809		No Name.			Concerned Individual Activists at Riley Ridge
W810		Ben	Melbourne		
W811		Jessica	Latimer		
W812a	Mr	C	Kealy		
W812b	Mr	Michael	Kealy		
W812c	Mrs	M	Kealy		
W813		Lee-Ann	Monk		
W814	Mrs	Lois	Stephon		
W815		A H	Jeavons	Proprietor	Tony Jeavons Surveys
W816		Marietta	Duse		
W817		Nicole	Cranston		
W818		Mel	Chilianis		
W819	Dr	Gordon	Forth	Director	Centre for Regional Development, Deakin University
W820		P & B	Connelly		
W821	Mrs	C	Liebscher		
W822		Anna Cecilia	Sande		
W823		David	Butt		
W824		Wayde	Thiele		
W825		Keith	Lockwood		
W826		Michael	Donovan	Chief Executive	Best Western Australia
W827	Ms	Kim	Godwin		
W828		J R	Pollock		
W829		Larry K	Waldron		
W830		Jeff	Smith		
W831		Jamie, Maxine & Barry	Antonio		
W832		Kim	Neubecker		
W833		Blair	Dixon		
W834		Steve	Burns		
W835		Delia	Crabbe		
W836		Gordon	Stokes		
W837		Leigh	Ackland		

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W838	E & H	Wooding		
W839	Chris	Peavey	Company Director	Peavey's Transport
W840	Shirley	Leembruggen	Honorary Secretary	Save The Dandenongs League Inc
W841	Jodie A	Honan		
W842	Richard	Kean		
W843	Dorothy	Hamilton-Smith		
W844	Leila W	Huebner		
W846	Beda	Rust	Factory Manager	Nestle Foods & Beverages
W847	Howard	Templeton	Mayor	Southern Grampians Shire Council
W848	Graeme F	Cock	Chief Executive Officer	FIAA Inc.
W849	Mairi Anne	Mackenzie		
W850	Chris	Meade	Managing Director	C M Timber Processors
W851	M J	Farguhan		

ATTACHMENT ONE Full copies of written public submissions.

This attachment is provided to the RFA-SC as a separate document.