



Response to Timber Harvesting Statement of Regulatory Intent – Draft for Consultation (DELWP)

15 May 2019

Now celebrating its 20th year, EcoCentre is a leading community-managed organisation with a dedicated team of scientists, educators and volunteers who design and implement innovative environmental programs.

We bring together people of all ages and backgrounds to spark solutions and inspire environmental leadership. Each year we collaborate with 27 Affiliate organisations, 120 schools and 250 partners from business, government, philanthropy, education and research institutions. Our collective impact since 1999 has transformed the way Melbourne understands wildlife, waterways and wellbeing in the age of climate change.

Although our expertise is Port Phillip Bay health and the urban ecology of Greater Melbourne, we recognise the importance of forests and the complexity involved in managing them for all Victorians. Accordingly, we offer this critique of the Draft **Timber Harvesting Statement of Regulatory Intent ('the DRAFT')**.

In summary, due to gaps in the information presented in the Statement of Intent we are unable to comment favourably on this initiative; and the following critique is offered to highlight where further detail is required.

The DRAFT states that: DELWP is committed to the OCR becoming a best practice regulator that the community can have confidence in; and, The initial focus of the OCR is to improve transparency and clarity on how DELWP regulates to protect our natural environment.

Whilst these goals are highly commendable it must be acknowledged that these outcomes can only be achieved by an OCR with adequate capacity to do so. **The DRAFT makes no mention of how many staff will be involved, what skill-sets they require, or where they will be based.**

Similarly, the OCR would garner much more public confidence if the relationships between it and the various other agencies involved in Victorian forestry were clearer. The descriptions of the seven (7) entities listed under **Roles and Responsibilities for timber harvesting in state forests**¹ refer to the primary roles of each entity and to which agency their activities are directed to. Most notably, the OCR (from the role description provided) will only engage with DELWP. This evidently limited function is at odds with the regulatory approach detailed on page 8.

In addition, the Roles and Responsibilities table describes the Minister for Agriculture (with the Department of Jobs, Precincts and Regions) as "... responsible for the vesting of timber resources in VicForests for harvesting and sale and the amount of timber that can be sustainably harvested each year."

According to the information provided in the Roles and Responsibilities table, this crucial role in Victorian forest management appears to be performed without any interaction or advice from any of the other listed agencies, or the OCR. In the interests of transparency and increased public confidence, clarification of relationships between all agencies is required; along with lists of relevant Federal legislation and Victorian regulations, as opposed to simply listing Victorian Acts.

While we appreciate that government processes can lead to demanding deadlines, the timeline for this consultation presents governance risk in managing Victoria's critical environmental assets. From the closing of public comments on 17 May, there is less than two weeks until the scheduled appointment of the Reference Group and publishing the final Statement of Intent, which may not allow sufficient time to transparently evaluate and incorporate our concerns outlined above. Given the extensive breadth of proposed responsibility of the OCR to regulate across 20 Acts of Parliament, producing a clear and comprehensive plan merits commensurate consideration.

Yours sincerely, 
April Seymore, Executive Officer

¹ Timber harvesting Statement of Regulatory Intent DRAFT for Consultation P. 7