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#### **Details of Filing**

Document Lodged:	Submissions
File Number:	VID1228/2017
File Title:	FRIENDS OF LEADBEATER'S POSSUM INC v VICFORESTS
Registry:	VICTORIA REGISTRY - FEDERAL COURT OF AUSTRALIA



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#### **Important Information**

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Wormich Soder

Registrar

## Annexure D to Applicant's Closing Submissions

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections <sup>i</sup>	Report)		Leadbeater's Possum habitat	
Ada Tree	Ginger Cat	1 bordering	Limited impact on		Mapped by VicForests as	Harvesting in this
	344-509-	coupe,	Leadbeater's		predominantly 1939 Ash	coupe would be
	0009	further 2	Possum, known		regrowth with some Mixed	unlikely to have a
	(logged)	within	colonies of		Species in the gullies. Site	direct impact on
		200m,	possum protected		inspection showed this to be	Leadbeater's Possum
		further 2	in SPZ with		appropriate for most areas	habitat over the short-
		within	retained habitat		inspected on the ground.	or long-term due to
		500m, and	providing suitable			the absence of areas
		further 3	habitat and		Dead stags were unusually	with sufficient HBTs.
		within 1km	corridors to enable		persistent in the general locality	
			likely movement		providing suitable habitat for	
		(Agreed	of Leadbeater's		Leadbeaters Possum where	
		Map CB	Possum.		patches of Acacia dealbata were	
		7.6C)			locally abundant in the	
					understorey.	
					No habitat trees have been	
					retained for habitat tree	
					recruitment in Ginger Cat or Blue	
					Vein (see Figure). Ginger Cat is	
					about 5 ha net and under the Code	
					should have 20 habitat trees	
					instead of none.	
					(Smith (1) 4.2.1 p74)	
					_	
					0 habitat trees per ha, CB 4.2.1	
					p106	
l						

# Assessment of harvest impacts on Leadbeater's Possum in Coupes subject of Leadbeater's Possum pleading

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections <sup>i</sup>	Report)		Leadbeater's Possum habitat	
	Blue Vein	2 in coupe &	Limited impact on	Likely to have had and will	Mapped by VicForests as	Harvesting in this
	249 506	further 6	LB	continue to have a significant	predominantly 1939 Ash	coupe would be
	348-300-	within 200m		impact (as contributed to a	regrowth with some Mixed	unlikely to have a
	0003			long-term decrease in	Species in the gullies. Site	direct impact on
	(logged)	(Agreed		population size; adversely	inspection showed this to be	Leadbeater's Possum
		Map CB		affected critical habitat;	appropriate for most areas	habitat over the
		7.6C)		modified, destroyed, removed	inspected on the ground, but	shortor long-term due
				or decreased the availability or	examination of aerial photographs	to the absence of areas
				quality of habitat to the extent	indicated presence of extensive	with sufficient HBTs.
				that the species is likely to	uneven-aged old growth mainly in	
				decline; and interfered with its	the gullies on Blue Cat and minor	
				recovery) (First Woinarski,	patches on Blue Vein, mostly in	
				[60])	the general area mapped as Mixed	
					Species. These areas are likely to	
					be Critical and Important habitat	
					for the Greater Glider and should	
					be retained and protected to	
					prevent a significant impact.	
					Dead stags were unusually	
					persistent in the general locality	
					providing suitable habitat for	
					Leadbeaters Possum where	
					patches of Acacia dealbata were	
					locally abundant in the	
					understorey.	
					(Smith (1) 4.2.1 p74)	
					4 habitat trees per ha, CB 4.2.1	
					p106	
	Blue Cat	1 within	Likely impact on	Likely to have had and will	As Above. Aerial photography	Harvesting in this
		coupe,	species will be	continue to have a significant	suggests that uneven-aged old	coupe would be
		further 2	limited.	impact (as will contribute to a	growth mixed species occurs in	unlikely to have a

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections <sup>i</sup>	Report)		Leadbeater's Possum habitat	
	344-509-	bordering		long-term decrease in	several large patches occupying	direct impact on
	0007	coupe,		population size; adversely	about 25% of Blue Cat. This	Leadbeater's Possum
	(scheduled)	further 3		affect critical habitat; modify,	Critical and Important habitat for	habitat over the short-
		within		destroy, remove or decrease	the Greater Glider (and	or long-term due to
		200m,		the availability or quality of	Leadbeater's Possum) can only be	the absence of areas
		further 4		habitat to the extent that the	reliably identified by pre-logging	with sufficient HBTs.
		within		species is likely to decline; and	survey. (Smith (1) 4.2.1 p74)	
		500m,		interfere with its recovery)	2 habitat trees per ha, CB 4.2.1	
		further 5		(First Woinarski, [72])	p106	
		within a km				
		(A ana a d				
		(Agreed				
	T 1	$\frac{\text{Map } 7.6\text{C}}{11}$	T''''			
Ada River	Jonnny	1 bordering	Limited impact		A mixture of Mixed Species and	Harvesting in this
	348-518-	coupe, 1	expected because		Ash uneven aged old growth	coupe would be
	0004	within 50m,	any Zone IA		12 habitat trees per ha, CB 4.2.1	unlikely to have a
	(scheduled)	further 2	habitat will be		p106	direct impact on
	``````````````````````````````````````	within	retained and LBP			Leadbeater's Possum
		500m,	SPZs protecting			habitat over the short-
		further 3	known colonies.			or long-term due to
		within a km				the absence of areas
		(Agreed				with sufficient HBTs.
		Map 7.5C)	<b>.</b>	A		<b>TT</b>
	Turducken	1 within	Limited impact		A mixture of Mixed Species and	Harvesting in this
	348-519-	coupe,	expected because		Ash uneven aged old growth	coupe would be
	0008	further 1	any Zone 1A		16 habitat trees per ha, CB 4.2.1	unlikely to have a
	(scheduled)	within	habitat will be		p106	direct impact on
	(	500m,	retained and LBP			Leadbeater's Possum
		further 2	SPZs protecting			habitat over the short-
		within a km	known colonies.			or long-term due to
		(Agreed	Retained forest,			the absence of areas
		Map 7.5C)	SPZs and			with sufficient HBTs.
			modelled			

Coupe	Coupe	LbP detections <sup>i</sup>	Davey (First Beport)	Woinarski	Smith observations regarding	Baker
group		uetections	exclusions should enable LBP movement.			
Baw Baw	Diving Spur 483-505- 0018 (scheduled)	1 in coupe and further 2 within 1 km (Agreed Map 7.7C)	Limited impact expected as coupe is a mixed species type and an LBP SPZ protects the known LBP colony		Mapped as more than about 50% old growth (pre 1860) Mixed Species with the remainder 1939 Mixed Species (Diving Spur) Site inspection shows that the many living senescent trees in this area have broken tops which may have been damaged by wind throw, possibly making the canopy height more uniform than normal in old growth. CB 4.2.1 p76 Uneven aged old growth Ash (depicted in photograph) CB 4.2.1 p77 12 habitat trees per hectare, CB 4.2.1 p106	Harvesting in this coupe could impact on Leadbeater's Possum habitat over the short- term if they are using the HBTs estimated to be in the coupe.
Beech Creek	Waves 300-524- 0002 (scheduled)	3 within coupe, further 1 bordering coupe, further 1 within 200m, further 2 within	The impact on the local population is likely to be limited.		VicForests map these coupes as a mix of 1939 and pre-1900 Ash Forests. Site inspection occurred only in the 1939 portion of the coupes and was consistent with mapping. Aerial photography is consistent with old growth forest mapping.	Harvesting in this coupe could have an impact on Leadbeater's Possum habitat over the short- or long-term due to the presence of these areas of high-quality habitat

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections <sup>i</sup>	Report)		Leadbeater's Possum habitat	
		500m,			Pre1900 (old growth) Ash forest	
		further 7			is a very rare and critical resource	
		within a km			in the Central Highlands. It is	
		(Agreed			estimated that prior to European	
		Map 7.8C)			settlement, 30-60% of the	
					Mountain Ash forests of the	
					Central Highlands were multi-	
					aged or old growth (Lindenmayer	
					et al. 2013b). However, due to	
					fires and past management, <2%	
					is currently estimated to be old	
					growth or multi-aged forest	
					(Lindenmayer <i>et al.</i> 2015).	
					0 habitat trees per ha, CB 4.2.1	
					p106	
	Surfing	2 bordering	Harvesting is		As above.	Harvesting in this
	3000-539-	coupes,	limited to nine		2 habitat trees per ha, CB 4.2.1	coupe would be
	0001	further 2	hectares and any		p106	unlikely to have a
		within	impacts on LBP			direct impact on
	(scheduled)	200m,	would be limited			Leadbeater's Possum
		further 2				habitat over the short-
		within				or long-term due to
		500m,				the absence of areas
		further 2				with sufficient HB1s.
		within a km.				
		(Agreed				
Calaa	II	Map 7.8C)	The immed on the		Manning about 1020 Ash Estast	Hammasting in this
Creek	nome &	5 bordering	local population is		Site inspection showed advanced	narvesung in this
CIEEK	Away	further 1	likely to be		Ash Pagrowth but no trace	uplikely to have a
	297-538-	within a km	limited		with hollows were observed in the	direct impost on
	0004	(A groad	minited.		with honows were observed in the	L and haster's Dessum
		(Agreed Mon 7 11C)				habitat over the short
		wiap 7.11C)				nautat over the short-

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group	(scheduled)	detections <sup>1</sup>	Report)		Leadbeater's Possum habitat inspection transect. Examination of aerial Photographs (map 11A) indicated the likely presence of scattered small patches of irregular canopy consistent with old growth throughout the coupe  Aerial photographs show that all regrowth ash on the coupe is within 100m of patches of potential old growth. 0 habitat trees per ha, CB 4.2.1 p106	or long-term due to the absence of areas with sufficient HBTs. However, any forestry operations should consider the proximate areas of high-quality habitat.
The Triangle	Professor Xavier 317-508- 0008 (logged)	4 in coupe and 2 within 200mof coupe boundary (Agreed Map CB 7.14C)	Any impact would be negligible.	Likely to have had and will continue to have a significant impact (as contributed to a long-term decrease in population size; adversely affected critical habitat; modified, destroyed, removed or decreased the availability or quality of habitat to the extent that the species is likely to decline; and interfered with its recovery) (First Woinarski, [68])		Harvesting in this coupe, particularly southwestern part with two hectares of high- quality Leadbeater's Possum habitat, could have impacted on Leadbeater's Possum habitat over the short- term due to the presence of some high-quality habitat and known records of Leadbeater's Possum near the plot.
	Swing High	2 within 50m and further 1 within 200m	Limited impact on LBP		Mapped as predominantly 1939 Ash regrowth forest with about 20% pre1860 forest. Site inspection and aerial photography	Harvesting in this coupe would be unlikely to have a direct impact on

	Daker
group detections <sup>1</sup> Report) Leadbeater's Possum habitat	L
317-508- (Agreed indicates that the forest was	Leadbeater's Possum
0010 Map CB substantially uneven aged old   7,14C) arouth before horizotting	nabitat over the short-
(logged) (1.14C) growth before narvesting.	or long-term due to
Pre1000 (old growth) Ash forest	with sufficient HBTs
is a very rare and critical resource	with sufficient fibits
in the Central Highlands (<2% is	
currently estimated to be old	
growth or multi-aged forest)	
(Smith (1) 4 2.1 p87)	
1 habitat trees per ha, CB 4.2.1	
p106	
Mount Louisiana 2 within Limited impact Site inspection showed the site to	Harvesting in this
Bride 245.526 200m, expected because be advanced regrowth (probably	coupe would be
1939) Ash. Aerial photographs	unlikely to have a
within habitat will be showed an irregular canopy	direct impact on
(scheduled) 500m, retained and LBP associated with old growth but	Leadbeater's Possum
further 4SPZs protectingground inspection showed that	habitat over the short-
within a km. known colonies. irregularity was due to patchy	or long-term due to
(Agreed regeneration with large patches of	the absence of areas
Map 7.15C) Acacia dealbata (excellent for	with sufficient HBTs.
Leadbeater's Possum) and "open	
grown" ash trees with unusually	
large crowns and stem diameters	
resulting from reduced	
competition. A number of these	
larger than usual open grown /9	
year old Ash trees had developed hellows (figures, dead growing	
nollows (lissures, dead crowins	
see Mount Bride photo below) at an unusually young age (normal	

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections <sup>i</sup>	Report)		Leadbeater's Possum habitat	
					age for hollow development is 120 years). (Smith (1) 4.2.1 p88) 3 habitat trees per ha, CB 4.2.1 p106	
	Bourbon Street 345-526- 0004 (scheduled)	1 within 200m, further further 5 within a km. (Agreed Map 7.15C)	Limited impact expected because any Zone 1A habitat will be retained and LBP SPZs protecting known colonies.		As above. (Smith (1) 4.2.1 p88) 3 habitat trees per ha, CB 4.2.1 p106	Harvesting in this coupe would be unlikely to have a direct impact on Leadbeater's Possum habitat over the short- or long-term due to the absence of areas with sufficient HBTs.
Nolan's Gully	Goliath 297-505- 00001 (scheduled)	1 within 500m (Agreed Map 7.18C)	Forest harvest impacts should be limited.		These coupes are mapped as Ash Forest with small amounts (about 20%) Mixed Species in all but Shrek. All of the coupes have some pre1860 Ash Forest which is extremely rare and critically important to Greater Gliders and Leadbeater's Possum. Most of Shrek (about 80%), about 50% of Junior and a small amount (about 15%) of Infant and Goliath is mapped as Old Growth. Site inspections showed habitat in areas mapped as regrowth in Goliath and Infant to have a low density scattered living large old trees (2/ha) in the overstorey. This habitat can be classified as	Harvesting in this coupe would be unlikely to have a direct impact on Leadbeater's Possum habitat over the short- or long-term due to the absence of areas with sufficient HBTs.

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections <sup>i</sup>	Report)		Leadbeater's Possum habitat	
					uneven-aged old growth Ash	
					which is very rare and critically	
					important as a fire and old growth	
					refuge for both the Greater Glider	
					and Leadbeaters possum. Suitable	
					habitat for both species was	
					evident on all coupes.	
					It is apparent from mapping,	
					aerial photography and site	
					inspections that much of the area	
					surrounding and including the	
					Nolan's Gully coupes, and forests	
					to the east, are part of a very	
					substantial patch of rare and	
					critically important uneven-aged	
					and old growth Ash Forest. Its	
					sheltered gully location is likely	
					to confer high wildfire protection	
					refuge status. Given the rarity of	
					this forest type, and the need to	
					increase the level of its protection	
					from the current 2% or less to	
					around 33%, any logging in any	
					of these coupes (or in any other	
					similar coupes in surrounding	
					areas) would have to be	
					requirements for protection of	
					Leadbeater's Dossum	
					$(\text{Smith}(1) \land 2 \land 1 \ \text{pQ3})$	
					$\begin{array}{c} (3111111) (1) (4.2.1  p73) \\ 2 \text{ habitat trees per hall CR } 1 2 1 \end{array}$	
					2 haohat tiees per lia, CD 4.2.1	
					p100	

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections	Report)		Leadbeater's Possum habitat	
	Shrek	1 within	The impact on the		As above.	Harvesting in this
	297-509-	50m	local population is		(First Smith, 4.2.1 p93)	coupe would be
	0001	(A greed	likely to be		5 habitat trees per ha, CB 4.2.1	unlikely to have a
	(scheduled)	(Map 7 18C)	limited.		p106	direct impact on
	(seliculicu)	Map 7.10C)				Leadbeater's Possum
						habitat over the short-
						or long-term due to
						the absence of areas
						with sufficient HBTs.
	Infant	1 within	Limited impact		As above.	Harvesting in this
	207 500	100m	with habitat trees		(First Smith, 4.2.1 p93)	coupe could have an
	297-309-	(A groad	in harvested area		2 habitat trees per ha, CB 4.2.1	impact on
	(scheduled)	(Agreed Mon 7 18C)	promoting future		p106	Leadbeater's Possum
	(scheduled)	Map 7.10C)	recolonization of			habitat over the short-
			harvested area			term if the area of
						high-density potential
						HBTs was being used
						by either species for
						denning.
	Junior	1 within a	The impact on the		As above.	Harvesting in this
	207-511-	kilometre	local population is		(First Smith, 4.2.1 p93)	coupe would be
	0002	(A greed	likely to be		0 habitat trees per ha, CB 4.2.1	unlikely to have a
	(scheduled)	(Agreed Map 7 18C)	limited.		p106	direct impact on
	(seliculicu)	Map 7.10C)				Leadbeater's Possum
						habitat over the short-
						or long-term due to
						the absence of areas
						with sufficient HBTs.
New	Greendale	1 within	Any impact would	It is challenging to evaluate		Could not analyse.
Turkey	348-515-	50m, further	be small.	the significance of the recent		
Spur	0004	2 within		harvesting activity at this		
	0004	500m,		coupe, but it is likely that has		
				resulted in at least short-term		

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections <sup>i</sup>	Report)		Leadbeater's Possum habitat	
	(logged)	further 3		diminution of the area of		
		within 1km		critical habitat for		
				Leadbeater's possum, and is		
		(Agreed		likely to contribute further to		
		Map CB		long-term decrease in its		
		7.17C)		population size and interfere		
				with its recovery (First		
				Woinarski [61])		
	Gallipoli	1 within	Limited impact	Likely to have had and will	Mapped as 1939 regrowth Ash.	Harvesting in this
	348-504-	50m and	expected because	continue to have a significant	Site inspection showed the site to	coupe would be
	0005	further 3	any Zone 1A	impact (as will contribute to a	have an exceptional abundance of	unlikely to have a
	0005	within a km	habitat will be	long-term decrease in	large dead trees with hollows	direct impact on
	(scheduled)	(Agreed	retained and LBP	population size; adversely	(stags) (11/ha) and at least one	Leadbeater's Possum
		Map 7.17C)	SPZ protecting	affect critical habitat; modify,	living old growth ash with	habitat over the short-
			known colony.	destroy, remove or decrease	hollows (see photo). Stags in	or long-term due to
				the availability or quality of	regrowth Ash are also critically	the absence of areas
				habitat to the extent that the	important to Leadbeater's Possum	with sufficient HBTs.
				species is likely to decline; and	which is known to favour this	
				interfere with its recovery)	type of habitat tree.	
				(First Woinarski, [73])		
					Dead stags provide a critical	
					A ab forests. Due to the source in fegrowin	
					Ash lorests. Due to the scarcity of	
					nabilitat trees in such forests all	
					ald regrowth forests should be	
					protected by unlogged buffers of	
					at least 50m radius and fire	
					harriers to prevent damage during	
					harvesting and post logging	
					hurning operations	
					(Smith (1) 4.2.1 p92)	

Coupe	Coupe	LbP detections <sup>i</sup>	Davey (First Report)	Woinarski	Smith observations regarding Leadbeater's Possum habitat	Baker
Coupe group Noojee	Coupe Skerry's Reach 462-504- 0004 (logged)	LbP detections <sup>i</sup> 2 bordering coupe and further 1 within 200m (THEZ partly logged at the same location as the damaged mature Tree Geebungs	Davey (First Report)	Woinarski	Smith observations regarding Leadbeater's Possum habitat12 habitat trees per ha, CB 4.2.1 p106Site inspection revealed a mixture of Ash and Mixed species with some scattered living old growth trees and dead stags, particularly on Epiphanie. On Skerrys and Loch Stock the habitat was structurally dense in patches highly suitable for Leadbeater's Possum.Before logging this coupe was structurally complex with	Baker This extends some distance away to the west. Harvesting in this coupe could have an impact on Leadbeater's Possum habitat over the short- or long-term due to the presence of a block of high-quality habitat within the coupe boundary. In
		labelled DDD03PA, DDD05PA, DDD06 and TTT03) (Agreed Map 7.19C; Post-harvest map 8.17C; Map of Geebung at CB 2.3.79)			scattered old growth, two ages of regrowth and dead stags. This type of habitat supported both Greater Glider's and Leaadbeaters Possums and had long term refuge conservation potential. (Smith (1), 4.2.1 p95) 1 habitat tree per ha, CB 4.2.1 p106	addition, forestry operations should consider the broader spatial context of the harvesting given the adjacent area of high- quality habitat for Leadbeater's Possum.
	Loch Stock 462-504- 0008 (scheduled)	1 within 200m, further 1 within 500m, further 1	Limited impact expected because coupe is generally a mixed species type.		Site inspection revealed a mixture of Ash and Mixed species with some scattered living old growth trees and dead stags, particularly on Epiphanie. On Skerrys and	Harvesting in this coupe would be unlikely to have a direct impact on Leadbeater's Possum habitat over the short-

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections <sup>1</sup>	Report)		Leadbeater's Possum habitat	
		within a km			Loch Stock the habitat was	or long-term due to
		(Agreed			structurally dense in	the absence of areas
		Map 7.19C;			patches highly suitable for	with sufficient HBTs,
		Post-harvest			Leadbeater's Possum.	but it should consider
		map 8.17C)			(Smith (1) 4.2.1 p95)	the broader spatial
						context of nearby
					5 habitat trees per ha, CB 4.2.1	habitat.
					p106	
Rubicon	Golden	2 within	Limited impact	Challenging to evaluate the		Could not analyse.
	Snitch	200m		significance of the recent		
	200 516			harvesting activities for this		
	200-310-	(A groad		coupe, but these actions are		
	0007	(Agreed Mon CP		likely to have resulted in at		
	(logged)	7 20C		least short-term diminution of		
		7.20C)		the area of critical habitat for		
				Leadbeater's possum, and are		
				likely to contribute further to		
				long-term decrease in the		
				population size of		
				Leadbeater's possum and		
				interfere with its recovery		
				(First Woinarski, [62])		
	Hogsmeade	2 within	Limited impact	Challenging to evaluate the		Harvesting in this
	288 516	coupe &		significance of the recent		coupe could impact on
	0006	further 4		harvesting activities for this		Leadbeater's Possum
	0000	within 200m		coupe, but these actions are		habitat over the short-
	(logged)			likely to have resulted in at		or long-term due to
		(A greed		least short-term diminution of		the presence of a
		Man CP		the area of critical habitat for		block of high quality
	Map CB		Leadbeater's possum, and are		habitat along the	
		1.20C)		likely to contribute further to		western edge of the
				long-term decrease in the		coupe.
				population size of		

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections	Report)		Leadbeater's Possum habitat	
				Leadbeater's possum and		
				interfere with its recovery		
			<b>.</b>	(First Woinarski, [62])		
	Houston	I within	Limited impact	Challenging to evaluate the		Could not analyse.
	287-511-	500m and		significance of the recent		
	0006	further 4		harvesting activities for this		
		within a		coupe, but these actions are		
	(logged)	kilometre		likely to have resulted in at		
				least short-term diminution of		
		(Agreed		the area of critical habitat for		
		Man CB		Leadbeater's possum, and are		
		720C)		likely to contribute further to		
		1.200)		long-term decrease in the		
				population size of		
				Leadbeater's possum and		
				interfere with its recovery		
				(First Woinarski, [62])		
	Rocketman	2 within	Limited impact	Challenging to evaluate the		Harvesting in this
	287-511-	500m and		significance of the recent		coupe would be
	0000	further 3		harvesting activities for this		unlikely to have a
	0007	within a		coupe, but these actions are		direct impact on
	(logged)	kilometre		likely to have resulted in at		Leadbeater's Possum
				least short-term diminution of		habitat over the short-
		(Agreed		the area of critical habitat for		or long-term due to
		Map CB		Leadbeater's possum, and are		the absence of areas
		7.20C)		likely to contribute further to		with sufficient HBTs.
				long-term decrease in the		
				population size of		
				Leadbeater's possum and		
				interfere with its recovery		
				(First Woinarski, [62])		

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group	DUI	detections	Keport)	<b>T</b> <sup>1</sup> 1 1 1 1 1 1 1	Leadbeater's Possum habitat	TT
Salvage	De Valera	4 within	Impact will be	Likely to have had and will		Harvesting in this
Creek	463-504-	200m	minor	continue to have a significant		coupe would be
	0009			impact (as contributed to a		unlikely to have a
		(Agreed		long-term decrease in		direct impact on
	(logged)	Map CB		population size; adversely		Leadbeater's Possum
		7.21C)		affected critical habitat;		habitat over the short-
				modified, destroyed, removed		or long-term due to
				or decreased the availability or		the absence of areas
				quality of habitat to the extent		with sufficient HBTs,
				that the species is likely to		but should be
				decline; and interfered with its		considered in the
				recovery) (First Woinarski,		broader context of
				[63])		neighbouring high
~ 11	<b>D</b> 11					quality habitat.
Starlings	Bullseye	4 within	Limited impact on	Likely to have had and will		Further harvesting in
Gap	345-503-	200m	LB	continue to have a significant		this coupe may have a
	0005			impact (as contributed to a		direct impact on
	0000	(Agreed		long-term decrease in		Leadbeater's Possum
	(logged)	Map CB		population size; adversely		habitat over the short-
		7.24C)		affected critical habitat;		or long-term due to
				modified, destroyed, removed		presence of areas with
				or decreased the availability or		high HSI.
				quality of habitat to the extent		
				that the species is likely to		
				decline; and interfered with its		
				recovery) (First Woinarski,		
				[65])		
	Opposite	2 in coupe &	Limited impact on	Likely to have had and will		While harvesting in
	Fitzies	turther 2	LBP local	continue to have a significant		this coupe would be
	345-506-	within 200m	population	impact (as contributed to a		unlikely to have a
	0004	(Agreed		long-term decrease in		direct impact on
		Map CB		population size; adversely		Leadbeater's Possum
		7.24C)		affected critical habitat;		habitat over the short-

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections <sup>i</sup>	Report)		Leadbeater's Possum habitat	
	(logged)			modified, destroyed, removed or decreased the availability or quality of habitat to the extent that the species is likely to decline; and interfered with its recovery) (First Woinarski, [65])		or long-term due to the absence of areas with sufficient HBTs and high-quality habitat, forestry operations should consider the broader spatial context and nearby block of Leadbeater's Possum habitat.
	Hairy Hyde 345-505- 0006 (logged)	1 in coupe & further 3 within 200m (Agreed Map CB 7.24C)	Limited impact on LB	Likely to have had and will continue to have a significant impact (as contributed to a long-term decrease in population size; adversely affected critical habitat; modified, destroyed, removed or decreased the availability or quality of habitat to the extent that the species is likely to decline; and interfered with its recovery) (First Woinarski, [65])		
	Hairy Hyde	1 within	Limited impact on	Further harvesting beyond that		Harvesting in this
	345-505- 0006	coupe, further 3 within	LBP as known colonies of possum protected	already undertaken in Hairy Hyde is likely to have a significant impact on		coupe would be unlikely to have a direct impact on
	(scheduled)	200m,	in SPZ with	Leadbeater's possum because		Leadbeater's Possum
		further 2	retained habitat	it: will contribute to a long-		habitat over the short-
		within	providing suitable	term decrease in population		or long-term due to
		500m,	habitat and	size; adversely affect critical		the absence of areas
		further 4	corridors to enable	habitat; will modify, destroy,		with sufficient HBTs.

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections <sup>i</sup>	Report)		Leadbeater's Possum habitat	
		within a km	likely movement	remove or decrease the		
		(Agreed	of LBP.	availability or quality of		
		Map 7.24C)		habitat to the extent that the		
				species is likely to decline; and		
				will interfere with its recovery.		
				(First Woinarski, [74])		
	Smyth	1 within	Limited impact	Likely to have had and will		Harvesting in this
	Creek	coupe,	expected because	continue to have a significant		coupe could have an
	345-504-	further 1	of the mixed	impact (as will contribute to a		impact on
	0003	within 50m,	species forest type	long-term decrease in		Leadbeater's Possum
	0003	further 1	and known and	population size; adversely		habitat over the short-
	(scheduled)	within	modelled LBP	affect critical habitat; modify,		or long-term due to
		500m,	habitat to be	destroy, remove or decrease		the presence of this
		further 6	retained and LBP	the availability or quality of		area of high-quality
		within a km.	SPZs protecting	habitat to the extent that the		habitat
		(Agreed	known colonies.	species is likely to decline; and		
		$\operatorname{Man} 7.24C$		interfere with its recovery)		
		Mup 7.210)		(First Woinarski, [74])		
	Starlings	2 within	Limited impact	Likely to have had and will		
	Gap	coupe,	expected because	continue to have a significant		
	345-504-	further 3	known and	impact (as will contribute to a		
	0005	within	modelled LBP	long-term decrease in		
	0000	200m,	habitat to be	population size; adversely		
	(scheduled)	further 2	retained and LBP	affect critical habitat; modify,		
		within	SPZs protecting	destroy, remove or decrease		
		500m,	known colonies.	the availability or quality of		
		turther 2		habitat to the extent that the		
		within a km.		species is likely to decline; and		
		(Agreed		(Figure 1) (Figure 1)		
		Map 7.24C)		(First Woinarski, [74])		
	Black	1 within	Limited impact on	Likely to have had and will		Harvesting in this
	Sands Road	50m, further	LBP as known	continue to have a significant		coupe would be

Coupe	Coupe	LbP	Davey (First	Woinarski	Smith observations regarding	Baker
group		detections <sup>i</sup>	Report)		Leadbeater's Possum habitat	
	345-505-	1 within	colonies of	impact (as will contribute to a		unlikely to have a
	0009	200m,	possum protected	long-term decrease in		direct impact on
	(achedyled)	further 1	in SPZ with	population size; adversely		Leadbeater's Possum
	(scheduled)	within	retained habitat	affect critical habitat; modify,		habitat over the short
		500m,	providing suitable	destroy, remove or decrease		or long-term due to
		further 7	habitat and	the availability or quality of		the absence of areas
		within a km.	corridors to enable	habitat to the extent that the		with sufficient HBTs.
		(A groad	likely movement	species is likely to decline; and		
		(Agreed Map 7 24C)	of LBP.	interfere with its recovery)		
		Map 7.24C)		(First Woinarski, [74])		
Sylvia &	Gun Barrel	1 within	The impact on the	Likely to have had and will		Harvesting in this
Kalatha	207 526	100m,	local population is	continue to have a significant		coupe would be
Creek	297-320-	further 1	likely to be	impact (as will contribute to a		unlikely to have a
	0001	within	limited	long-term decrease in		direct impact on
	(scheduled)	200m,		population size; adversely		Leadbeater's Possum
		further 1		affect critical habitat; modify,		habitat over the short-
		within 500m		destroy, remove or decrease		or long-term due to
		and further 2		the availability or quality of		the absence of areas
		within a km		habitat to the extent that the		with sufficient HBTs
		(A greed		species is likely to decline; and		within the coupe.
		(Map 7 25C)		interfere with its recovery)		
		Wap 7.25C)		(First Woinarski, [75])		
	Imperium	2 in coupe,	The impact on the	Likely to have had and will		Harvesting in this
	297-530-	further 1	local population is	continue to have a significant		coupe would be
	0001	within	likely to be limited	impact (as will contribute to a		unlikely to have a
	0001	200m,		long-term decrease in		direct impact on
	(scheduled)	further 1		population size; adversely		Leadbeater's Possum
		within 500m		affect critical habitat; modify,		habitat over the
		and further 1		destroy, remove or decrease		shortor long-term due
		within a km		the availability or quality of		to the absence of areas
				habitat to the extent that the		with sufficient HBTs.
				species is likely to decline; and		

Coupe group	Coupe	LbP detections <sup>i</sup>	Davey (First Report)	Woinarski	Smith observations regarding Leadbeater's Possum habitat	Baker
		(Agreed	•	interfere with its recovery)		
		Map 7.25C)		(First Woinarski, [75])		
	Utopia	1 within 50m	The impact on the	Likely to have had and will		Harvesting in this
	297-530-	of coupe, further 3	local population is	continue to have a significant		coupe would be unlikely to have a
	0002	within	limited.	long-term decrease in		direct impact on
	(scheduled)	500m, and		population size; adversely		Leadbeater's Possum
		further 3		affect critical habitat; modify,		habitat over the short-
		within a km		destroy, remove or decrease		or long-term due to
		(Agreed Map 7.25C)		habitat to the extent that the		with sufficient HBTs.
				species is likely to decline; and		
				interfere with its recovery)		
				(First Woinarski, [75])		
	South Col	4 bordering	The impact on the	Likely to have had and will		Harvesting in this
	298-509- 0001	coupe, further 1	local population is	continue to have a significant		coupe would be
		within 50m,	limited.	long-term decrease in		direct impact on
	(scheduled)	further 1		population size; adversely		Leadbeater's Possum
		within		affect critical habitat; modify,		habitat over the short-
		200m, further 1		destroy, remove or decrease		or long-term due to
		within		habitat to the extent that the		with sufficient HBTs
		500m, and		species is likely to decline; and		
		further 1		interfere with its recovery)		
		within a km		(First Woinarski, [75])		
		(Agreed Map 7 25C)				
		1,1up / .200).				

- i VicForests admit that each blue circle on the Agreed Maps constitutes a Leadbeater's Possum detection (Notice to Admit CB; Notice of Dispute)
- ▲ Woinarski's opinion is that there can be no doubt that harvesting in any coupe in which Leadbeater's Possums occurs modifies, destroys, removes and decreases the availability or quality of habitat immediately and into the future. Considers that, given Leadbeater's possum is Critically Endangered and undergoing decline with its current small population size and decline pivoting largely on the sparse and declining availability of large old hollow-bearing trees any factor that causes modification, destruction, removal, and decrease in the extent and quality of suitable forested habitat will contribute further now and into the future to the decline of the species (Second Woinarski, at [33]).
- □ Woinarski's opinion is that:
  - i. all current and prospective suitable habitat is critical for survival of Leadbeater's Possum, and necessary for its recovery, given the current Critically Endangered status of Leadbeater's possum, and its predicted severe ongoing decline, including significant risks of extinction. (Draft Leadbeater's Possum Recovery Plan CB 4.7.2.21 p38; TS 555.1-556.5).
  - ii. the much larger cohort of trees regrowing after the 1939 wildfires (which are especially targeted for harvesting) is a critical resource. These generally do not have hollows now, but in the future these will provide the next major source of hollows (Woinarski (2) at [13] and [42] and [27]). Any factor, such as harvesting of trees that currently provide hollows, *or will do so in the foreseeable future*, will contribute to this regional-scale ongoing reduction in hollow availability, and hence will consolidate and exacerbate the long-term decrease in Leadbeater's possum population size (W (2) at [27]).
  - iii. there is a real chance or possibility that actions, such as harvesting, that cumulatively and continually reduce the extent and quality of its habitat now and into the future, will reduce the likelihood and rate of (i.e. interfere with) any recovery. (W (2) p14)
  - iv. in relation to impacts on occurrences of Leadbeater's Possum within 200m, 500m or 1km of the coupe a 200 metre protective (exclusion) buffer around a sighting may not encompass all the area in which individuals of that possum colony move (and all of the habitat area on which that colony depends) (W (3) at [40]). Relative to a Leadbeater's possum population living in an extensive continuous forest, a population contained within a 200 metre radius THEZ, surrounded or nearly so by harvested areas, is far more likely (i.e. has a real chance or possibility) to face decrease in population size. (W (2) at [28]). 200m buffers only provide a low-medium impact on reducing extinction risk, low impact on retaining quality and extent of habitat and medium impact on retaining the number of individuals, 500m buffers provide medium impacts on these matters, and one kilometre buffer was predicted to have generally 'high' benefits including on reducing extinction risk (LPAG Technical Report CB 11.96 p42; W (2) 4.9.1 p25-26 at [66f]). Dr Davey agreed with these ratings (T510.10-40).