

SUBMISSION No. 100
Inquiry into the Australian forestry industry

Remember OK Tedi

The Western Rivers Preservation Trust

PO Box 124, Mole Creek, Tasmania 7304

Committee Secretary
House of Representatives Standing Committee on
Agriculture, Resources, Fisheries and Forestry
PO Box 6021
Parliament House
CANBERRA ACT 2600
AUSTRALIA

Friday 29th April 2011

Phone: (02) 6277 4500
Fax: (02) 6277 4516
email: arff.reps@aph.gov.au

**Inquiry into the Australian Forest Industry -Submission by Western Rivers
Preservation Trust**

1. Introduction

Western Rivers Preservation Trust (WRPT) is a community based organization established 7 years ago after continued environmental breaches of the Forest Practices Code by the forest/plantation industry usually associated with industrial scale clear felling and plantation establishment. The obvious impact to the local communities was sedimentation of the waterways, chemical overspray, usually from aerial spraying of plantations and very explicit contraventions involving buffer zones in wet areas or drainage lines in the logged coupes.

My own background involved farming 6000 acres on King Island, and harvesting and processing pinus radiata from a State Govt. plantation on the Island as preservation material and a small saw log operation for 26 years.

2. The Current Forest Industry in Tasmania

The forest industry in Tasmania owes its continued existence based on ongoing subsidies and continually being propped up by both State and Federal Governments. Since the

development of the woodchip market over the past 25 years in particular, has sadly lead to the demise of the timber industry. Production has been based on volume of a low value product. It has lead to the industrial scale clear felling of our native forests and in most cases the conversion to monoculture tree plantations.

Interestingly 79-83% on average and up to 96% in some coupes, especially *old growth*, of the trees felled go into woodchips. The remainder is saw log and veneer. (*See table, appendix one, attached*)

- According to [Harry Quick](#), the ALP's federal member for Franklin: "Decades of corporate welfare have seen the taxpayer prop up logging in Tasmania to the tune of \$780 million.

Even with the Federal Government's poorly thought out Managed Investment Schemes (MIS) to promote the establishment of tree plantations, a scheme banned in the USA and the EU, the plantation industry still failed. One of the main problems was that MIS was only ever taxation (tax minimization) driven and never production driven. Added to this the production figures/forecast yields were highly exaggerated at best.

The MIS bungle cost the Federal Govt. over \$700m/year in lost revenue in taxation. Add to this the "opportunity cost" of the farm production loss of these areas converted to trees.

Another example of subsidies being wasted was after the Helsam Enquiry, the Federal Govt. funded the planting of blackwood for specialized sawlogs into the future (the Garden of Eden in the Gog Range). *Pinus radiata* was used as nurse crop. However 21-25years later the pine was harvested (2010), the blackwood had been suppressed by mismanagement that the blackwood plantation was a total failure (*appendix four*).

This development through total mismanagement, lead to the demise of the Giant Freshwater Lobster, listed as vulnerable under the EPBC 1999 and the Tasmanian Threatened Species Act 1995 (*see report, appendix two, attached*).

Further subsidies to the Tasmanian logging industry in 2005/6 are summarized in *appendix eleven*.

3. Current Forest Practices Unsustainable

Industrial scale clear felling of the native vegetation and the conversion to monoculture plantations as practiced in Tasmania in unsustainable. If given the opportunity we will present to the hearing clear evidence of this gathered over the years. The presentation will show how the loss of topsoil impacts on the regrowth of the trees. Australian soils, in particular in the southern parts, are by their very nature, poor. The massive disturbance during this clear felling and the use of heavy machinery, has a detrimental impact of the soils ability to support the type of regrowth the industry expects. Added to this, the continued practice of windrowing and mound ploughing up and down the slopes, leads to severe soil erosion and again loss of soil fertility.

A report by Forestry Tasmania (FT) August 2005, "Sustainable High Quality Saw Log Supply" Review No.3, states that by 2012, 95% of saw logs will have a mean diameter no greater than 500mm.

The area logged of State eucalypt production forest was 1.47% in 2010 (8700ha) which equates to a 68 year rotation. 2010 was a bad year for logging for FT. The year 2004-2005, 2.85% (17500ha) of the native production forest was logged, which equates to a 35 year rotation. We can show slides of coupes logged in 1975 and replanted in 1976 by FT and they clearly will never make saw logs at their current growth rates.

By the year 2045, all State forest (667000ha) will be cut over and 50% (322000ha) will be clear felled. That does not spell out sustainable! These are FT's figures.

Interestingly, by FT definition a rainforest is no longer a rainforest if eucalypts make up >5% of the crown cover; it then becomes a mixed native forest!

Interestingly 79-83% and up to 96% of the trees felled go into woodchips. The remainder is saw log and veneer (*refer to appendix one*).

I get tired of the continued reference by the forest industry that Tasmania has 47% of the land mass locked up and protected in reserves. Not True. 33.4% of the 47% is eucalypt forest which equates to 16.519% of the total land mass (*appendix three and appendix six*).

If we start talking about the loss of the biodiversity and loss of ecosystems within these forests, the detrimental impacts on the water ways and our water catchments, loss of amenity for this type of industry we must wonder the logic of it all. And with all of the govt.'s continued assistance it still failed.

I will not discuss the possible negative impacts in this submission on "Climate Change" and the loss of these forests - the "lungs of the earth" to quote FT!

I must add that our organization fully supports selective logging of our native species for timber production, accept in areas of High Conservation Value, where such practices may be detrimental to a water catchment, a threatened species or has some other particular value that is being threatened.

4. FPA dysfunctional in Tasmania.

The Forest Practices Authority (FPA) administers the Forest Practices Code in Tasmania. The Forest Practices Codes (FPC) reads very well, however in practice, it has little meaning to most of the forest industry in Tasmania.

Over the years we have collected numerous breaches of the FPC and reported them to the FPA, but to of no avail. These breaches were mainly to do with exclusion areas, Machinery exclusion zones, buffer zones adjacent to water ways or drainage lines, chemical over sprays, mainly during the establishment of plantations, the clear felling of native vegetation and the re establishment of plantations on karst areas, including on areas of water catchments for local communities. These can be made available on disc and illustrated at any hearing if required.

Forest Practices Plans for coupes to be clear felled have misrepresented proper stream classification, boundaries have been incorrect and detailed surveys or identification of certain swamp types, sinkholes etc have been omitted.

The harvesting of the rainforests in the Tarkine typifies current forest management practices in Tasmania. Visiting these coupes after a clear fell operation and seeing whole millable logs of myrtle, sassafras and leatherwood left on the forest floor to be burnt, or logs that have been decimated and pushed into windrows during the harvest process is hard to comprehend. Some logs clearly marked with IST (Island Specialty Timbers) are placed on these windrows to be burnt. Photos will be made available at the inquiry. This type of action is industrial scale vandalism of a valuable resource and it is little wonder why there is so much friction in the forest industry in Tasmania. This gross incompetence in the management of our resource is a reflection on the body (FPA) that administers the Forest Practices Code.

5. World Markets are demanding FSC Accreditation

These areas of our major water catchments and extreme biodiversity and ecosystems are being destroyed primarily for wood chips. There is no way that companies or FT will ever obtain Forest Stewardship Council (FSC) accreditation under these practices. The industrial scale clear felling of these areas and the negative impacts on the environment and water catchments must be protected for our future generations. Properly managed selective logging in these areas with minimal impacts could be acceptable. However with the wood chip industrial being volume driven, this destruction is just a by product of this industry.

The most lucrative market for wood chips (Japan) is now demanding FSC accreditation. The recent decision for Gunns Ltd to move out of these native forests into plantation has been market driven and therefore a commercial decision on their behalf. It has nothing to do with the “round table talks” with the environmental groups and industry. The recent decision by Gunns Ltd is a ploy to receive further govt. assistance by way of a payout. It has been reported in the media that this may be as much as \$200m.

The Japanese market is refusing woodchips from conversion coupes, native vegetation or HCV forests. Hence the fall in demand for woodchips over the past 12-18 months.

6. Impact of Tree Plantations

6.1 Water catchments

The national average for water interception from tree plantations is around 1.7ml/ha /year. The figure in the higher rainfall areas (Tasmania) is more likely to be around 4.3ml/ha/year. (David Leahman, geohydrologist, Tasmania).

Water is our most valuable resource, more particularly in times of global warming. It should be a mandatory requirement that all future plantation developments be accompanied by a water management plan and a water audit of the area.

48 of the identified water catchments in Tasmania, 44 contain tree plantations. The Huntsman Dam water catchment is in fact all eucalypt tree plantations. The map overlays will be presented at the hearing, if given the opportunity.

These plantations are routinely aerial sprayed for the leaf eating beetle with alphacypermethrin, a synthetic pyrethroid which is a known neurotoxin and suspected endocrine disruptor. Third world mentality surely. The “precautionary principle” should apply as we cannot guarantee that there will be no detrimental impacts to human health or to the biodiversity of our environment in future years from the continued use of these sprays in our catchments.

The report by the APVMA “APVMA Operating Principles in Relation to Spray Drift Risk 15 July 2008” clearly states that the practice of aerial spraying of chemicals is prone to missing the target areas (*see report, appendix five*).

Other sprays are used in the establishment of these plantations including the triazines, which are mutagenic, carcinogenic, epigenetic and again endocrine disruptors leading to reproductive disorders in humans and wildlife. (Facial tumor disease in the Tasmanian devil? (*see study, appendix seven*)).

There have been numerous cases of chemical contamination of our water catchments from the establishment of tree plantations. I have included one example as reported by Mathew Denholm in The Australian 30 April 2009 (*appendix eight*).

6.2 Destruction of Biodiversity/Ecosystems

Monoculture tree plantations by their very nature are devoid of the biodiversity and complex ecosystems which existed in the native forests that they replaced.

The practice of aerial spraying for the control of leaf eating beetles is supposed to only occur when the native bees are not active. (APVMA stipulation on the use of the chemical involved). The plantations in our area are sprayed invariably during January-March which is when most native plants are flowering!! This practice would therefore have a negative impact on the bee population at that time.

6.3 Impacts on Local Council Rate Revenue/Infrastructure

A recent study on rate revenue undertaken by a Councilor in the Burnie municipality, found that rates on plantations was approx. \$7.00/ha, farmland \$45.00/ha and lifestyle farms \$70.00/ha. This shortfall in rate revenue from the establishment of plantations will be offset by an increase in rates by the rest of the community. Added to this will be the extra

negative impact on rural roads and bridges during the logging operation and the cartage of logs to be processed or shipped overseas.

6.4 Loss of Local Service Industries to Rural Communities

Support industries for the rural farming areas are lost when tree plantations are established on previously farmed areas. The tree once established, require minimal labour input for 15-25 years depending on the rotation. Even when harvested, outside contractors usually move in with mechanical harvesters and associated equipment for re-establishing the coupe. The whole industry is contractor based with contractors moving around the State.

6.5. Lost Food Producing Areas

In our municipality alone, over 15000ha of farmland was converted to MIS plantations. This equates to a loss of approx. 75 farms or 270 direct jobs. Governments keep reminding us of an impending world wide food shortage and yet they allow these prime, reliable, food producing areas to be lost to trees!

The Tasmanian Govt. is now promoting an irrigation development in the midlands of Tasmania to become a “food bowl”. The area historically has had salt problems which could become exacerbated by this development. Some of the best food producing areas in the north-west have been replaced by tree plantations, most probably with MIS funding and tax incentives. It does not make any sense.

There has been some discussion on establishing small woodlots on farms which has some merit. Up to 15% of a farm can be put into shelter belts without any lost production. However these woodlot must be well away from any water ways or drainage lines in order to protect our water catchments from the possibility of any sedimentation or exposure to chemical contamination.

6.6 Toxic leaching from eucalypt leaves

Evidence is now being formulated that the establishment of large industrial scale eucalypt tree plantations can lead to problems with toxic runoff as a result of the decomposition of eucalypt leaves containing naturally occurring toxins, which are poisonous to human cells and other living organisms.

The Brazilian govt. has recognized this and is trying to address the problem. The Tasmanian govt. refuses to recognize the issue.

6.7 Plantations on Karst

The karst system in the Great Western Tiers by its very nature is fragile and is prone to land slip in times of heavy rainfall. This last winter

illustrates this clearly with at least three major and four minor land slips in the karst area around Caveside. One very large landslip occurred in the Lobster rivulet area. Even though this whole area is extremely fragile in nature it is being clear felled on an industrial scale and established into plantations.

The area is riddled with under ground water ways and sinkholes and is adjacent to world class limestone caves, which are being threatened by these forestry operations.

Kevin Kiernan's publication prepared for the Forest Practices Board, "Forest Sinkhole Manual Feb 2002" (*appendix nine*), clearly states how vulnerable these areas are. If the FPA was not so dysfunctional, this issue may not be a problem. We can clearly illustrate our concerns and the many contraventions of the recommendations of this Manual during the forest operations in these areas.

6.8 Sustainability of plantations in Australia

During the MIS frenzy of establishing tree plantations forecasts of 250tonnes/ha production was been promoted by the forest industry. Sadly the forecasts were out by a factor of two. Actual figures were more likely to be around 120-150 tonnes/ha. A part of the reason form the shortfall was that the earlier trials were not factoring in the edge effects of the small trial woodlots. There was also the "greed factor" of the people selling the schemes.

It belies belief that Australia could even think of competing with countries like Brazil who have a plantation rotation of 5-8 years using *E. globulus*. Surely it would make more economic sense to look after our specialty species and harvest them selectively for timber and not wood chips.

I would also doubt the suitability of *E. nitens* as a timber resource.

I would also like to refer the committee to the publication "Science" vol. 310, 23rd Dec 2005. This summaries research undertaken by 10 international scientists and it clearly points out how unsustainable the plantation industry is (*appendix ten*).

7. Institutionalized Corruption/Cronyism in the Forest Industry in Tasmania

The following reference summarizes this claim and is an indication of what generally goes on in the forest industry in Tasmania (*Corporations, Government and Development: The Case of Institutional Corruption in Tasmania, Quentin Beresford, Australian Journal of Political Science, 1363-030X, Volume 45, Issue 2, 2010, Pages 209 – 225*).

"Pulp Friction In Tasmania" edited by Fred P. Gale also is another excellent reference covering the corrupt processes in Tasmania covering the Gunns pulp mill process.

8. Proposed Gunns Pulp Mill – Tasmania

The previous section has dealt with the detail surrounding this development. I wish to emphasize that it was the withdrawal from the Resource, Planning and Development Commission (RPDC) process and the subsequent adoption of the Pulp Mill Assessment Act (PMAA) that was non democratic and corrupt.

Gunns withdrew from the RPDC process as the mill's design was critically non-compliant. The Govt. then passed the PMAA (primarily drawn up by Gunns Ltd) and with it, Section 11, which in effect removed the right for any member of the public to take Gunn's to court over any contravention of the permit conditions. Gunn's needed to do this as they knew that the proposed mill would have severe environmental problems down the track.

I have included this in my submission as it encapsulates what is ongoing in the forest industry in Tasmania.

When the fight for the Wesley Vale pulp mill was lost in 1990, the then govt. adopted a policy of removing all impediments to the forest industry in Tasmania.

9. Alternatives for fibre

This is just a reminder that there are alternatives to wood to be used as a fibre source e.g. wheat straw, a residue from the growing cereal wheat, sadly the process is currently only being used in India.

Hemp low in THC, is a more sustainable source of fibre and can be grown in areas with a lower rainfall (650mm) cf tree plantations (800mm) and produce up to four times the amount of fibre per ha..

The forest industry needs to move on with the times. Every other industry seems to adapt to change without the continue govt. payouts and subsidies.

10. Land Swap by FT

There needs to be an investigation into Crown Land tenure in Tasmania, as it appears that vast tracks of land belonging to the Crown (99000ha or more) has been converted to freehold title and transferring to FT ownership. This land could be sold if need be by FT in an attempt to raise revenue for the government. The detail relating to this can be submitted at a hearing if requested.

In order that we can present our submission thoroughly we would require at least two hours, preferably more taking into account of our traveling time and expenses getting to Canberra.

Prepared by:

Neil Graham
President WRPT
422 Dairy Plains Road
Dairy Plains 7304

Pete Godfrey
Researcher WRPT
Golden Valley 7304

contact nos. 03 63 678 286