House Standing Committee on Agriculture, Resources, Fisheries and Forestry

Inquiry into the Australian forestry industry

Submission from Environment Tasmania, TWS and ACF

Terms of Reference

The House of Representatives Standing Committee on Agriculture, Resources, Fisheries and Forestry shall inquire into and report on the current and future prospects of the Australian forestry industry, particularly in regards to:

- Opportunities for and constraints upon production;
- Opportunities for diversification, value adding and product innovation;
- Environmental impacts of forestry, including:
  - impacts of plantations upon land and water availability for agriculture; and,
  - the development of win-win outcomes in balancing environmental costs with economic opportunities;
- Creating a better business environment for forest industries, including:
  - investment models for saw log production;
  - new business and investment models for plantation production; and,
  - superannuation investment in plantations;
- Social and economic benefits of forestry production;
- Potential energy production from the forestry sector, including:
  - biofuels;
  - biomass;
  - biochar;
  - cogeneration; and,
  - carbon sequestration;
- Land use competition between the forestry and agriculture sectors:
  - implications of competing land uses for the cost and availability of timber, food and fibre;
  - harmonising competing interests; and,
  - opportunities for farm forestry.

Inquiry into the Australian forestry industry

The forest 'debate' in Australia has raged for several decades now and this inquiry is a critical opportunity to see if resolution to the long running conflict is possible. Environment Tasmania, The Wilderness Society and the Australian Conservation Foundation welcome the chance to have input.

1. Introduction

The forestry industry in Australia is, and has been for some time, in crisis. At the same time the Australian community's demands for protection of the environmental values that native forests provide has continued to grow.

For many years, environment organisations have been calling for a significant shift in forest policy and focus. Such a shift would see native forests protected for what they do best – protect biodiversity, store carbon, produce clean water and be maintained as special places for people to appreciate and enjoy for perpetuity. New policy is needed to secure a shift in industry jobs from native forests to plantations, a move that is already happening due to market demands.

The Australian Government needs to abandon the Regional Forest Agreements (RFAs). Where RFAs remain in place, conflict in public forests persists. Where they have been abolished, conflict has dissipated. It is clear that RFAs have failed to protect jobs, industry security, or the environmental benefits of native forests.

By immediately developing a policy framework that supports a move to industry reliance on processing plantations for our commodity wood resource, the Australian Government can end the conflict in public native forests and deliver both forest protection expectations and industry jobs growth.

The Australian Government needs to grasp the opportunity now at hand to end the decades long conflict in Australia's native forests. There is a real opportunity to move out of native forest logging as it is clear that Australia's commodity wood products can be fully supplied from existing plantations and available processing technologies.

The proportion of Australia's wood products coming from native forests has been declining for decades. At the same time Australia's plantation wood production has continued to grow and indeed it is likely that in the next few years Australia will be producing more wood from plantations alone than our national wood consumption. The technology exists to provide the wood and paper products we need from plantation sourced wood. In combination this means that the ongoing conflict over the logging of native forests for commodity wood products is increasingly unnecessary.

At the same time other values of native forests, including water, biodiversity and carbon are being better understood and becoming increasingly important to the Australian community. It is clearer now than ever that it is in the interests of all Australians that our native forests be protected and managed into perpetuity for these values.

Now is the chance to end this division and conflict and realise the chance to have the benefits of an ecologically sustainable plantation industry, the wood products we value and to protect our native forests to get the best ecological outcomes from these.

The forest policies of the three organisations are attached as appendixes.

2. Environmental impacts of forestry

2.1. Carbon Emissions

Australia's native forests are enormous stores of carbon. It has been acknowledged that broad scale clearing and conversion to other land uses (deforestation) of carbon dense forests and woodlands is an enormous source of greenhouse gas emissions. What has been largely ignored in this debate is the volume of greenhouse gases emitted from logging (degradation) of carbon dense native forests.[1]

Logging of these forests replaces carbon dense forests with young re-growth forests, and carbon that has been stored out of the atmosphere for many centuries is released back into the atmosphere. Greenhouse gas emissions, through logging and subsequent manufacturing processes, come from a number of different sources:

- accelerated decay of a large proportion of the living biomass at the logged site
- accelerated oxidization of dead biomass and soil carbon
- wastage from manufacturing processes leading to final product
- consumption of fossil fuels in harvesting machines, transportation from logging site to processing plant, and industrial processes associated with production of final product

Research has established that when previously unlogged forests are brought into commercial production, there is a 'permanent' loss of 40-60% of the carbon previously stored in those forests (depending on the intensity of logging)[2]. It i typically takes at least 150 years to recapture 90% of all the lost carbon. Conversion of native forests to plantation entails a loss of up to 80% of the carbon previously stored.

From a climate change perspective, forest degradation needs to be defined as any land use activity that reduces the carbon stock below its natural carbon carrying capacity. This obviously includes commercial logging and the resulting emissions need to be fully accounted for in national carbon accounts, in any emissions trading scheme and a national greenhouse and energy reporting system. Clearly there is a substantial opportunity cost associated with continuing to log natural forests.

The problem is further exacerbated insofar as emissive logging activities also tend to degrade the capacity of the biosphere to buffer atmospheric carbon dioxide concentrations by absorbing it (sequestration). It is important to note that the land sector (and oceans) provides the only known mechanism for drawing down and sequestering atmospheric carbon.

When determining net greenhouse gas emissions from logging, the impact of the product on built carbon stores needs to be considered. However, the single largest end use of trees logged in Australia's native forests is woodchips and pulplogs. A recent Freedom of Information request in Victoria demonstrated that more than 85% of native forests logged end up as woodchips, waste and sawdust. In Tasmania pulplogs for woodchip production makes up around 90% of native forests logged. These products have a average carbon lifecycle of only three years[3]. The International Panel on Climate Change (IPCC), and

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1 Degradation encompasses the conversion of native forests to plantations as well as native forest logging, under current definitions. See decision 16/CMP.1 UNFCCC, and FAO forest definition and classifications

2 Roxburgh, S, Wood S, Mackey B, Woldendorp, G, Gibbons, P, 2006, Assessing the carbon sequestration potential of managed forests: a case study from temperate Australia, J Appl Ecology, 43, 1149-1159.

3 Jaako Poyry Consulting: Technical Report no. 24. September 2000. Analysis of wood product

current international accounting rules, require forest managers to assume that 100% of the carbon in harvested wood products they sell has been emitted to the atmosphere at time of sale.

For a comprehensive understanding of an analysis of the carbon carrying capacity of natural versus industrial forests, see Mackey, *et al* 'Green Carbon: the Role of Natural Ecosystems in Carbon Storage', 2008.

The results of recent research into the carbon carrying capacity of Australia's eastern forests[4] demonstrate that current estimates (which are based on mensuration plots in plantation and young regrowth forests) significantly underestimate the potential for these forests to sequester and store carbon out of the atmosphere.

There are substantial and as yet not fully quantified opportunities to reduce GHG emissions from ending broad scale clearing of native vegetation, native forest logging and degradation of native vegetation from a range of threats including inappropriate fire management and water regimes.

For these opportunities to be fully explored more accurate assessments of the carbon stored in native ecosystems need to be undertaken and the emissions from loss or degradation more accurately accounted and reported. The National Carbon Accounting System (NCAS) needs to be recalibrated in the light of the most recent research.

Linkages and synergies between biodiversity protection and restoration and climate mitigation are vital. Protection and restoration of biodiverse natural systems offers the best prospect of achieving permanence of carbon storage in vegetation and, being more resilient, will be an essential component of strategies to assist nature adapt to climate change.

The framework for assessing the contribution forests can play in mitigating climate change needs to be re-drawn to clearly distinguish between the potential role of native forests and agricultural tree crops (plantations). It should focus primarily on achieving deep, early GHG emissions reductions and secondarily on medium to long term sequestration potential.

2.2. Biodiversity

Decades of scientific work, documented in many scientific papers and reports demonstrate that habitat loss, fragmentation and degradation from native forest logging has a significant impact on biodiversity. The higher the intensity and scale of logging, the greater the impact on biodiversity. Much native forest logging in Australia's public forests is clearfell logging, and remains the most controversial.

We take the example of logging in Victoria's native forests to demonstrate issues of biodiversity impacts.

The framework on which native forest logging occurs in Victoria is under the principles of Sustainable Forest Management. As per the Department of Sustainability and Environment and the state government's policy, the *Sustainable Forests (Timber) Act 2004*, provides for the development of Victoria's sustainability charter.

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accounting options for the National Carbon Accounting System. Report for the Australian Greenhouse Office.

4 Mackey B, Keith H, Berry, S, 2008 (in press), The Role of Natural Ecosystems in Carbon Storage: the Green Carbon Accounting Problem: Summary of Results from a case Study of Australia's South East Eucalypt Forests and Policy Implications", Research Report ANU Enterprise Pty Ltd.

The charter was introduced in 2006, and in 2008, DSE reported on the charter through the *State of the Forests Report 2008*. This report highlights that VicForests' operations are far from meeting the state's own sustainability criteria.

Regeneration failure has been a long standing issue and conservation groups have highlighted problems with regeneration for decades. For example, on the Errinundra Plateau in East Gippsland, many coupes logged before and after the implementation of the RFA have not grown back to *"approximate the composition and spatial distribution of canopy species common to the coupe prior to harvesting".*

The Expert Independent Advisory Panel (EIAP), has raised the regeneration issues for a number of years. This is unacceptable and further logging should be halted until there is clear evidence that Victorian public forests are growing back successfully.

As acknowledged in the Australian Government's State of the Forests Report 2008, the Leadbeater's Possum monitoring program is "one of the most significant and longest running forest monitoring and research programs of its type in the world". The Australian National University's Professor David Lindenmayer has been leading this research for almost three decades. In a recent interview with The Age newspaper, Professor Lindenmayer stated that the Leadbeater's Possum is "incredibly close to extinction" and that "forestry is the key threatening process"[5].

Biodiversity impacts, especially with invertebrates that rely on the coarse woody debris on the forest floor, will be particularly bad as successive logging rotations reduce the natural structure of the forest and push species closer to extinction.

A 2006 Federal Court ruling found that logging in a Tasmanian forest was not able to ensure the survival of three key threatened species and would push them closer to extinction. Even Forestry Tasmania acknowledge the issue and have said that "*the issue of waste raises interesting issues, as we now understand the importance of maintaining course woody debris on the forest floor for future maintenance of forest biodiversity, therefore the retention of logging residues is seen as an environmental necessity*"[6].

Native forest logging operations in other parts of the country have similar cumulative impacts on biodiversity. This is the key impact that fuels opposition to native forest logging around Australia.

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[5] The Age newspaper, October 2, 2010

[6] Hans Drielsma, Executive General Manager. Forestry Tasmania, 22 December 2005. http://www.forestrytas.com.au/forestrytas/media_releases/two_visions_for_tasmania.html

3. The development of win-win outcomes in balancing environmental costs with economic opportunities

3.1. The Tasmanian Initiative

Tasmania is currently in the midst of a stakeholder led process that aspires to deliver a win-win-win outcome for the environment, industry and community. The signing of a Statement of Principles[7] was a breakthrough after decades of conflict over native forests logging.

Amongst other things, this Statement sees traditional combatants in the logging debate sit down and reach agreement about a broad pathway forward. This includes the agreement to protect eNGO identified high conservation value forests, a transition for the industry to exit logging in the majority of other public native forests and support for building a new, plantation processing industry.

While recognising that all situations are unique, given the environmental, social and economic similarities between Tasmania and other native forest logging jurisdictions around Australia, the Statement of Principles and the process that led to its development could present a useful model for conflict resolution in other areas.

The discussions that led to the signing of the Statement of Principles were precipitated by the deepening crisis in the Tasmanian native forests logging industry. Despite the supposed security and 'balance' of the RFA and subsequent Tasmanian Community Forest Agreement, the public subsidisation of the industry to the tune of many hundreds of millions of dollars, and the unwavering political support for the industry and its operations, processing facilities have continued to close down, jobs continue to be lost and conflict has deepened.

Public policy aiming to 'balance' environmental costs with economic opportunities has failed demonstrably.

As the signatories to the Statement of Principles have reached broad agreement on a pathway forward, they now look to government to rapidly implement the agreement and deliver the outcomes in a practical, policy and legislative. Investing in the opportunity to resolve the long-running conflict over logging in Tasmania needs government input. Should this opportunity fail to be realised, Tasmanians may face years more conflict and subsidisation as environmental crises deepen, social division deepens and the economic viability of logging these forests continues to become more marginal.

3.2. Meeting our Wood Product Needs

Plantations now produce the vast majority of Australia's processed wood products. Native forest sawmilling has been reduced to a remnant market-share. We have enough plantation wood supply to meet all our domestic timber needs and to develop a strong export oriented timber industry. Hardwood plantations can now entirely replace native forest woodchip production.

Because processing is the richest source of employment in the forest industry most current timber worker jobs are generated by the plantation processing industry.

While Australia has a trade deficit in timber products arising mostly from imports of pulp and paper, a trade deficit on an individual commodity is not an issue for employment or

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[7] http://www.wilderness.org.au/regions/tasmania/tasmanian-forests-statement-of-principles

economic growth because Australia's comparative advantage lies in other products and commodities. Bear in mind too that the deficit is in the dollar value of our wood products trade – in wood volume terms we export much more then we import – the key then to rectifying our balance of trade in wood products is not to chop down more trees but to value add to those we do chop down. Appropriate investment in processing to the plantation sectors burgeoning output could eliminate Australia's entire forest products trade deficit.

3.3. RFAs

For years, industry and environmentalists have been in conflict over the tension between protecting and optimising non wood values, and resource extraction in native forests. In some parts of the country, including South East Queensland, parts of Western Australia, North East New South Wales and Western Victoria, and this conflict has largely ended, as the industry in these locations has predominantly moved to a plantation base. At the same time, the Regional Forest Agreements in these locations have either been terminated, were never implemented, or are virtually redundant.

Where Regional Forest Agreements (RFAs) remain in effect, commodity production in native forests continues to fuel community division over native forest management. RFAs have entrenched controversial logging against changing industry trends and market demand. Even in traditional timber towns, where overlogging has seen a decline in both forest values and jobs, communities are urging governments to end its support for an industry whose heyday has passed. This is most prominent in Tasmania, Victoria, New South Wales and the remaining native forest logging areas in Western Australia.

It is clear that the Regional Forest Agreements have not delivered upon their charter of balancing protection for forest values with jobs growth in the timber industry. Where commodity logging continues, jobs continue to be lost and pulplog production continues to drive the logging. RFAs have simply accelerated a trend that was happening prior to their implementation, rather than reverse the impacts of a declining industry.

It is time for a new vision for the 'timber' industry in Australia. This inquiry sets the scene to implement this vision. This opportunity will be tragically missed if government does not set a clear agenda to move resource production out of native forests into Australia's vast plantation estate and to develop a framework that supports farm forestry through community based partnership programs with natural resource agencies.

3.4. Certification

The Forest Stewardship Council and its certification schemes currently offer the only space in which a productive discourse between environment, social and economic stakeholders involved in the broad forest debate is occurring. FSC certification is a required market entry for an increasingly large segment of the downstream processing sector. The failure of Australian Paper to be in a position to supply book printing paper for the Harry Potter series in Australia was significant in the demise of the company in Tasmania. The author required that the book be printed on FSC stock. The market for tissue papers and retail hardware is following a similar path.

For Australian companies to be able to sell into the most profitable markets FSC certification is a requirement. Companies that cannot or choose not to take this pathway are at significant risk. The Australian Government has supported an alternative certification scheme, The Australian Forestry Standard with large amounts of financial support both directly for the development of the standard and indirectly by providing funding to support

the promotion of the scheme. No Australian ENGO's (including The Wilderness Society) support this scheme because of the way the standard setting process was conducted[8]. This scheme is still associated with highly controversial native forest logging practices.

FSC certification is leading to genuine measurable improvements in plantation management outcomes. The only native forest logging likely to be supported by the Wilderness Society is small scale eco-forestry that is FSC certified. The Wilderness Society supported the recent successful FSC certification of the Lagoon of Islands property in the Central Highlands of Tasmania.

In order for the industry in Australia to maximise its opportunities the Australian Government should provide funding to support the development of an FSC standard as part of the National Initiative of FSC Australia.

3.5. Biomass

Bioenergy fueled by wood taken from native vegetation (especially forests) is unsustainable and should be categorically ruled out across Australia. There are a number of reasons for this:

- Logging in native forest ecosystems in Australia is associated with a high emissions profile and restrains the capacity of the landscape to sequester carbon9
- The impact of maintaining commodity logging cycles in native forest is an overall reduction in the carbon carrying capacity of between 40% and 60%
- Scientific evidence demonstrates that native forests are carbon sinks that continue to sequester carbon for up to 800 years. Research published in Nature10"found that old-growth forests accumulate carbon for centuries and contain large quantities of it. We expect, however, that much of this carbon, even soil carbon, will move back to the atmosphere if these forests are disturbed." Native forests should not be disturbed by logging due to the huge amount of carbon they store and the ongoing role they play in sequestering carbon. The Renewable Energy (Electricity) Act must be updated to reflect the latest science.
- Burning native 'wood waste' for energy establishes another market for residues which will make it economic to log species and forests which are currently unloggable and would be likely to lead to increases in logging rates or shorten rotation lengths, all of which would generate higher carbon dioxide emissions.
- Native forest biomass is not 'waste'. In addition to a poor outcome for emissions, so called 'wood waste' plays a vital role in maintaining healthy bio-diverse forest ecosystems. The key driver behind native forest logging is pulplog production, mainly for woodchips, not sawlogs. In Victoria, 85% of native forest logging ends up as woodchips, waste and sawdust. In Tasmania, over 90% of native forest logged ends up as woodchips.
- The renewable energy market needs to receive clear signals to guide investment in truly renewable industries. The inclusion of native forest biomass allows subsidised

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[8] http://www.wilderness.org.au/pdf/Certifying_the_IncredibleFULLv3.pdf
http://www.wilderness.org.au/campaigns/forests/pdf/TWS,%20Certifying%20the%20Incredible-responseto%20AFSLtdV1,%20Feb%202006.pdf

[9] Dean, C., Roxburgh, S. & Mackey, B.G. (2003) Growth modelling of *Eucalyptus regnans* for carbon accounting at the landscape scale. *Modelling Forest Systems* (eds A.Amaro, D. Reed & P. Soares), pp. 27–39. CABI Publishing, Wallingford, UK.

[10] Luyssaert, S. (September 2008) Old-growth forests as global carbon sinks. *Nature* 455, 213-215 http://www.nature.com/nature/journal/v455/n7210/full/nature07276.html

native forest logging to compete on a non-level playing field with emerging, value added renewable technologies, including solar and wind.

- Controversy surrounding native forest wood waste will reduce public confidence in renewable energy and the National Renewable Energy Target Scheme.

There are many feedstocks for the production of bioenergy ranging from organic wastes, agricultural and plantation forestry residues and bioenergy plantations. Many forms of bioenergy are sustainable, renewable sources of energy and should be encouraged. As with any source of energy the whole lifecycle of bioenergy production needs to be considered in order to ensure that it is sustainable.

It is incorrect to assume that burning of native forest biomass for energy production is carbon neutral, although this assumption is often made – naively by those who don't know and think 'renewable' somehow confers carbon neutrality, and cynically by those who are well aware of the emissions impact.

In March 2001, the Wilderness Society commissioned a Morgan Poll on behalf of environmental groups found that 88% of people opposed the use of native forest wood fired power. In addition only 8% of those polled thought burning native forests was renewable. This compared with 12% who thought that nuclear energy was renewable.

Although this Morgan Poll is almost ten years old, bioenergy from native forest remains deeply unpopular with the public.

Electricity retailers are reluctant to sell electricity from native forest biomass. In our discussions with electricity retailers they see this public awareness of the environmental problems associated with burning native forests as being a major disincentive to the purchase of (REC) Renewable Energy Certificates from power stations which burn native forest material. An industry publication once referred to them as 'dead Koala RECs'.

The controversy associated with native forest bioenergy is a threat to the public image of sustainable biomass and of renewable energy generally. Despite the environment movement repeatedly specifying that it is native forest bioenergy that is causing the environmental problems, continual bad publicity associated with native forest bioenergy projects has inevitably tarred sustainable bioenergy crops with the same brush.

During the implementation of Australia's renewable energy legislation, previous governments had committed to convening an expert panel to examine the issues around eligibility of native forest wood waste as a renewable energy source under MRET. This commitment was not carried through.

The Senate Committee that reviewed the legislation at the time made the following first recommendation:

"The Committee recommends that non-plantation native forest wood products and wood wastes be specifically excluded from the list of eligible renewable energy sources."

The Wilderness Society strongly supports the development of a viable a vibrant renewables energy sector. However, the inevitable public controversy that would accompany native forest bioenergy production will damage public confidence in sustainable bioenergy and also damage the image of the renewable technologies industry in Australia.

The Wilderness Society believes that renewable energy legislation should reflect the same credentials as the current nationally recognised and accredited "GreenPower" program which outright prohibits the use of native forest biomass in green energy programs.

To avoid the perverse outcomes that burning of native forest biomass brings, the Wilderness Society strongly urges the Federal Government to alter its renewable energy

legislation to outright prohibit the use of any native forest biomass for energy generation under the act.

3.6. Carbon sequestration

Research is continuing into the sequestration potential of native forests but preliminary, indicative results suggest it is substantial.

The issue of long term storage of carbon in wood products is vexed and crediting carbon stored in such products would result in distorted and/or perverse outcomes while ever current approaches to carbon accounting in forests prevail.

The proportion of any logged natural forest which ends up in medium or long term wood products is very small. 80-90% of native forests logged end up woodchips and pulplogs. Native forest logged for bioenergy generation will immediately emit its CO_2 to atmosphere.

The inclusion of harvested wood products without the inclusion of the loss of carbon in the forest would be a case of partial accounting that would give incentives to create more emissions "off-book". Any such approach would substantially increase Australia's CO_2 emissions.

The Prime Minister's Task Group Report discussed incentives for Harvested Wood Products but only in the context of plantation offsets. With plantation offsets the effects of emissions from logging is not an issue because in a Kyoto eligible plantation there was not a pre-existing store of carbon before the plantation was established.

However, with native forest there is currently no accounting for the emissions from logging. Thus a perverse incentive would be created to destroy an immense store of carbon while claiming emissions credits for a much smaller amount of sequestration in long term wood products. It would be perverse to give credit to offsets that actually increase carbon emissions.

Lobby groups who support the on-going woochipping of our native forests argue that logging native forests actually reduces greenhouse gas emissions. The arguments for this stance are misleading at best, as they fail to fully account for:

- True carbon carrying capacity of forest including live biomass, course woody debris, litter and soil carbon
- Post logging accelerated drying and decomposition of carbon stored in soil
- Accelerated decay of carbon in other forest biomass not removed from logging site
- Burning of forest biomass not removed from logging site in post-logging burns
- Burning of fossil fuels for machinery in logging coupes
- Burning of fossil fuels from transport of logs, often over hundreds of kilometers
- Burning of fossil fuels during manufacturing processes to make end product
- Emissions from end use of sawdust and waste from sawing and manufacturing processes
- Over estimation of sawlog recovery rates and current end-product account classifications
- Under estimation of volume of end-products that store carbon only for very short term
- Under estimation of the long time period required for logged forests to recover their carbon stores

The market needs clear messages about what does and does not emit carbon. Robust science, not rhetoric, must be used to inform Australian companies about climate change implications of their business decisions.

3.7. Opportunities for farm forestry

Purpose planted trees in integrated farm management can play a major role in producing Australia's timber products. This can happen at a time when marginal traditional farming operations are looking to diversify their income streams. The Australian Government should be looking to the farming sector to understand what contribution they can make to producing durable high value sawn timber from purpose planted trees. There are numerous successful examples around the country where small farms have produced high grade sawn timber products that are as good as what traditionally has come from native forests. We need a policy vision that sees these tree plantings not only provide low quality, high volume commodity pulp for paper production, but also high quality, low volume sawn timber for high end applications.

Whilst the focus remains on native forest logging, this even playing field will not be achieved. Removing the unfair competition from state native forest sources means that private land holders will have in increased incentive to invest in long term rotation purpose planted trees for sawlog.

The vision for plantations and purpose planted trees must also extend beyond high rainfall areas and look to what opportunities small scale farm forestry in low rainfall areas can bring to the industry. The benefits include the restoration of biodiverse plantings in areas where almost all native vegetation has been removed. Understanding the long term implications and costs of such a contribution is crucial to making it a reality and this cost must not just be placed on individual private land owners.

In addition further work and support is needed to encourage private native forests to be managed to optimise biodiversity, carbon storage, landscape amenity and water catchment benefits. While there is likely to be a possible role for a boutique small volume certified special timber industry form private native forests, the same environmental, market and technological pressures exist that are in place for public native forests exist. To this end it will be beneficial for the Australian Government to support land holders to protect and care for their native forests including development of systems that provide financial incentive to do this and that recognise the changing community expectations of those forests without placing the burden to deliver this on the landholders themselves.

4. Creating a better business environment for forest industries – the benefits of completing the transition to plantation based timber industry

4.1. Summary

The fundamental pressures pushing a transition of commodity timber production out of Australia's native forests into plantations have increased over recent years and are highly likely to continue to grow. These pressures include;

- A supply side crunch from ongoing rising public demand and new science that is shrinking the availability of native forest wood through increasing protection and restriction
- Demand side market shifts away from native forests towards plantation timbers for multiple reasons including consumer demand and much more efficient production and processing

A transition of commodity timber production out of Australia's native forests is already occurring due to changes in the market-place and pressures to move to the more efficient processing and growing option of plantation woods.

In Tasmania in particular there is a strong and growing view within the timber industry that there is not a conflict free and predictable future in logging our native forests and that a resolution to the conflict surrounding the timber industry is vital for their future.

A transition out of commodity timber production in native forests should occur in a structured, facilitated and supported manner where regional communities and timber workers are supported through the transition by governments – the current Tasmanian Statement of Principles process is working towards this outcome.

4.2. Forest Pressure

Current rates of logging in public native forests are unsustainable. For example in Tasmania the 300,000 m^2 of High Quality (HQ) sawlog required by legislation is much more than the public forest estate can sustain – from either a conservation, or sawlog supply perspective. This is recognised by industry (e.g. Forests and Forest Industry Council, 2009[11] and Forestry Tasmania, 2007[12]) as well as conservationists. In addition the past decade has seen a number of examples of reducing wood availability as regional conservation initiatives have further reduced the availability of native forest wood. In all likelihood these trends will continue. The native forest sector is a no growth potential industry – on the contrary it is declining.

The conservation values expected by the community of our native forests are gaining an increased recognition. In addition there are also ongoing improvements in scientific understanding of conservation values that lead to further restrictions on logging of native forests. These two trends are highly likely to continue, causing ever growing pressure to protect native forest from logging.

Increased pressure to maximise these conservation values, and reducing logging rates from unsustainable levels, will conspire to further reduce availability of native forest logs. This creates two disadvantages of the native forest sector over the plantation sector because:

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11 Forest and Forest Industries Council, 2009(?), The New Forest Industry Plan; A fresh Approach, Forest and Forest Industries Council P16

12 Forestry Tasmania, 2007, Sustainable High Quality Eucalypt Sawlog Supply From Tasmanian State Forest, Planning Branch, Forestry Tasmania, Review no. 3, eg p16

- There are no growth opportunities in native forest resource availability.
- There is high sovereign risk attached to public native forest resource as the community expectations around conservation increases and voters consider having their say at each election.
- These disadvantages to native forest logging are highlighted by:
    - The decision of Australia's largest native forest processor, Gunns Ltd, to exit the native forest sector altogether and transition its business to one based on plantations.
    - The decline in native forest sawmills in the state from 45 in 2004 to 29 in 200913 and specifically country sawmills have declined from 85 in 1990 to 26 today.
    - The decline in assumed native forest jobs in Tasmania has been from 3,818 jobs in 2006 to 2,382 in 2010, a decline of 37%.[14]
- On the resource demand side, the markets for native forest logs are shrinking (eg demand for NF chip logs for Japan).

In the last two years the timber industry has lost jobs at a far greater rate than in other sectors of the Tasmanian economy, pointing to much more significant problems than the Global Financial Crisis alone. These are widely understood to be:

- Changing national and global demand for plantation products over natural forest sourced products (because of both quality and environmental reasons).
- The Tasmanian forestry industry's inability to respond to these changes in demand.

The combination of market preferences combined with the one way decline in native forest resource availability discussed above mean that Tasmanian native forest logging and processing is becoming increasingly economically unviable.

4.3. The transition is already happening

The timber industry in Australia is already in the process of a transition out of native forest logging. Over the last two decades (1990 to 2010) plantation timber production in Australia has nearly tripled (from 6 to 18 million m^3 a year)[15]. Native forest production has been progressively declining in the same time (shrinking from about 11 to 8 million m^3 a year)[16].

Australia is forecast to produce more plantation timber (around 30 million m^3 from 2010 onwards) than its total timber consumption (about 20 million m^3 for the last several years).

In Tasmania, native forest logging has been declining for most of the past decade (eg. Pulp log production from native forest has fallen from 4.6 million tonnes in 2002/3 to 1.7 million in 2009/10 with falls occurring in almost every year[17]). Concomitantly the area covered by

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13 Based on DPIWE records of businesses with greater than 1000m^3 annual output.

14 Schirmer, J. 2010 Tasmania's forest industry: trends in forest industry employment and turnover, 2006 to 2010, technical report 206, CRC for Forestry.

15 Ajani, Dr. Judith 2011 Feb, *Australia's Wood and Wood Products Industry Situation and Outlook: Working Paper*, Fenner School of Environment and Society, the Australian National University, p 4

16 Ibid.

17 Figures derived from Forestry Tasmania and Private Forests Tasmania Annual reports.

plantation timber in Tasmania has doubled in the last fifteen years with production expected to grow for at least another 10 years.

While small portions of the uses of native forest timber - mostly appearance grade hardwood products (eg, that account for about 10% of Tasmania's total native forest log extraction) are going to require a little more time to effectively replace with plantations, the vast bulk of the native forest timber (fibre and framing) can now easily be substituted by plantation timbers.

4.4. Benefits of a Transition

A transition out of public native forest timber logging will:

- Support a shift of industry to plantation forests where it will enjoy much reduced sovereign risk relative to public native forest sourced wood.
- Support industry and rural communities to move to the plantation sector in growing and processing, giving it much greater long-term prospects including a conflict-free space in which to work.
- Allow Tasmania to deliver other benefits from public forests that are at odds with industrial logging such as brand, tourism, recreation and conservation.
- Will allow natural values and ecosystem functions to be returned to healthy states.

However the key outcome to be achieved here is that an orderly transition through the current talks and process will make it possible to minimise the losses for workers, rural communities and businesses while optimising the native forest protection benefits the community also seeks.

In summary such a transition would include:

- Government support for timber workers and exiting businesses.
- A moratorium and full protection of ENGO identified HCV forest reserve proposals.
- A transition out of remaining native forest into suitable and socially acceptable plantation forests.
- Re-tooling of the industry to capacity build and enable mills to downstream process plantation timber.
- Provide for ongoing small volume high value speciality native forests timbers.
- Additional support for adjusting rural and regional communities.

5. Recommendations

The current crisis facing both the Australian timber industry and our native forests must be fixed once and for all. With industry and environment groups in discussion over the future of native forest management, the Australian government should show support for these discussions and renew its timber industry support accordingly.

It is recommended that the Australian Government:

- Support ongoing negotiations between industry and environmental groups to end decades of conflict and deliver both native forest protection and jobs security in plantations
- End Australia's remaining Regional Forest Agreements.
- Facilitate the transition of all commodity timber logging into plantations including an immediate end to export woodchipping from native forests.
- Support the development of sustainable plantation practices by; supporting FSC certification, supporting investment through ending market distortions such as MIS and public native forest wood supplies, and supporting integrated farm forestry and catchment and landscape planning to ensure ecological and natural resource sustainability.
- Prohibit the burning of native forest biomass for any power generation.
- Utilise carbon legislation, prices mechanisms and investment to leverage the protection of native forests for biodiversity resilience and carbon storage.
- Improve measurement of and accounting for the impacts of clearing and degrading of natural systems to ensure Australia fully quantifies the scale of emissions from native forest logging and clearing.
- Support the protection of all remaining native forests across the continent to maintain and enhance its quality and extent and facilitate the management required to optimise the biodiversity, water, amenity and carbon values of these forests.

AUSTRALIAN CONSERVATION FOUNDATION

GO

Policy

FORESTS

Policy Statement No. 59

1. Introduction

Australia's forests and woodlands are the legacy of millennia of evolutionary processes, including Aboriginal land management regimes. Forests and woodlands play a vital role in the functioning of Australia's ecosystems.

Apart from their own intrinsic values, Australia's native forests and woodlands provide a wealth of irreplaceable natural values, including:

• biodiversity at the genetic, species and ecosystem level;
• habitat for hundreds of millions of organisms, many of which are unknown to science;
• contribution to climate regulation on a regional and global level;
• regulation of hydrological cycles and ensuring water supplies;
• maintaining and conserving soils and other geomorphological features; and
• as a storage bank for carbon.

Values that the human community can directly enjoy include:

• spiritual values;
• aesthetic and landscape values;
• scientific values; and
• recreational values.

Our forests also have significant economic values based on the genetic material they contain, their tourism potential, and their role in maintaining ecological processes and productive systems .

Across Australia, forests and woodlands have been destroyed and their values substantially depleted since European occupation through agricultural clearing, forestry and other processes. Some forest and woodland communities are degraded to the point where they are in danger of extinction. Most forest and woodland communities have been seriously fragmented and/or disturbed.

Sufficient capacity is already available from existing plantations and other fibre sources to allow a rapid transition of the sawmilling and pulp & paper industries out of native forests.

There is growing awareness of the threats to extinction of many species in Australia and the need for threatened species protection and vegetation clearance controls to maintain habitat.

Australia's signing/ratification of the Ramsar, World Heritage, Biodiversity and Climate Change Conventions brings obligations for native forest reservation and management.

Additionally, there is conflict between forestry and other uses of forests such as water production and tourism, and there are detrimental economic impacts to those other industries (and lost opportunity costs) resulting from native forest logging.

2. Forest conservation

ACF advocates that all remaining native forest and woodland in Australia should be preserved.

All native species and communities in native forest and woodland ecosystems must be protected to conserve biodiversity and all ecological processes.

Consequently, ACF opposes the logging of native forest and woodland in Australia, believing that our society is currently incapable of harvesting wood from native forests and woodlands in a manner which respects and maintains ecosystem processes.

Native forests and woodlands should be protected by a system of secure and adequate reserves. This system should include areas of local and regional significance, as well as areas of State, national and international importance.

Similarly, the ACF opposes any further clearing of native vegetation and other activities which destroy forest and woodland ecosystem processes.

Acknowledging that forestry is currently entrenched in Australia's native forests, it is recognised that a rapid transition strategy is required to achieve these goals.

ACF believes that a rapid transition strategy should proceed as follows:

• Immediate cessation of logging in all forests of high conservation value;

• Immediate cessation of the conversion of native forest (and other native ecosystems) to plantations;

• Immediate cessation of native forest logging on environmentally sensitive sites, including steep slopes, erodible soil types and all domestic water supply catchments.

• An immediate cessation of logging in old growth forests;

• Cessation of logging within three years in natural regrowth areas - sooner where there is a regional availability of alternative wood supplies;

• Immediate cessation of logging in areas regenerating after clear-felling and silvicultural treatment which:

* are the habitat of species susceptible to further disturbances;
* form vital links of native vegetation in climatic sequences;
* are the only corridors available to link less seriously modified forest areas;
* are integral to the restoration of wilderness areas;
* are in major water supply catchments;
* are needed for more effective management of adjacent protected areas;
* or have or retain other community values.

3. Wood production and supply

ACF believes that Australia's wood needs can and must be derived principally from existing mature plantations. Any further plantations must be established on already cleared land and integrated into sustainable agricultural systems.

Sawn timber and other solid wood products should be derived from:

• extant softwood plantations;
• technological conversion (Valwood etc) of young timber from extant hardwood plantations and clearfall silvicultural regeneration; and
• long rotations of some areas of clearfall silvicultural regeneration and plantations to produce some speciality timbers.

Pulpwood/fibre should be derived from:

• thinnings and residues etc. from softwood sawlog plantations;
• low quality softwood plantations;
• extant hardwood pulpwood plantations;
• plantations, woodlots etc. which are integrated into agricultural production on cleared land;
• fibre crops such as hemp which can be grown as a sustainable alternative crop to diversify farm production; and
• post-consumer recycled fibre.

4. Sustainable Management

ACF believes that there is no imperative to establish any additional large monocultural plantings of softwoods or hardwoods, particularly on public land, in order to supply existing needs. All new planting should be integrated into agricultural production where there is scope for more diverse plantings.

For extant areas of monocultural plantings and areas of clearfall silvicultural regeneration remaining in wood production, a comprehensive enforceable code of practice should be developed in respect of soil, water, fire, pest and weed management. Such a code should be enforced by environmental protection agencies, not wood supply agencies.

In the unlikely event that an endangered species is found or becomes established in a plantation, the area should be protected, the landowner compensated and a study undertaken to determine the ecological requirements of the species.

Management codes should specify:

• slope limits by soil types and harvesting technology;
• streamside management (buffers etc);
• strict controls of chemical and fertiliser use (including a rapid phase-out of pesticide use and replacement with biological control systems and a cessation of the use of the triazine herbicides in all domestic supply catchments);
• a biological invasion management strategy;
• establishment regimes which maintain site quality; and
• that wood production integrated into agricultural management systems should be subjected to agricultural codes of practice designed to address the issues detailed above.

5. Trade in wood products

ACF believes that as an overriding principle that no import or export of forest products from sources other than those outlined above should occur.

ACF advocates that wood production in tropical forests should be transferred from primary to secondary forests and/or plantations outside the forest estate. Consequently trade in tropical timbers other than those certified as having been harvested in plantations should only occur when the following conditions have been negotiated on a country by country basis:

• identification and establishment of large and key areas of forest for protection as national parks and reserves to protect representative examples of all forest types, the full range of biological diversity of the country or region, and wilderness and World Heritage values;

• the scale of logging and the standard of management practices are such that they do not threaten the area's ecological integrity or viability or its ability to continue to support any traditional inhabitants;

• adequate inspection and monitoring provisions to ensure compliance with the agreed conditions are established; and

• full cooperation of owners and inhabitants of the land concerned exists.

ACF advocates that:

• there should be an immediate cessation of all imports of temperate and boreal forest old growth forest products;

• no new export woodchip or CITES listed product licenses should be issued and the cancellation of existing licenses for forest products derived from native forests should occur as soon as legally possible.

ACF is committed to changing public attitudes and consumption patterns towards support for softwood substitution, recycling paper, use minimisation in packaging etc.

ACF will work in international forums and with international NGOs to the limit of its capacities to ensure its forest products trade policies are implemented.

6. Institutional arrangements at local government, State and Commonwealth levels

ACF believes that:

• for the federal government, international obligations should be reflected in Commonwealth legislation and respected. Where possible they should be used to negotiate involvement in management arrangements in return for financial support with the States over issues such as World Heritage, National Estate, Threatened Species.

• Accounting for State forest agency's operations should be separated into discrete accounts for plantation and native forest operations immediately.

• A uniform national accounting standard for all state forest agency operations, which covers both recurrent and capital aspects, should be implemented. The standard should require transparency and the exposure of all hidden subsidies.

• State forest agencies should be subject to trade practices law;

• For local government, all proposals to clear native vegetation should be subject to conditional approval requiring consultation with relevant State and Commonwealth agencies;

• Structural adjustment packages to ensure minimal disruption to regions and communities likely to be affected by a transfer of logging out of native forest should be negotiated between the Commonwealth and all the stakeholders in the region or community.

Other relevant ACF Policies include Pulp and Paper Mills for Australia, National and World Heritage Areas

Adopted May 1995

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Environment Tasmania

Forest Policy

2010

Ratified at General Meeting, Environment Tasmania, Hobart, February 2010.

The following policy recommendations represent a joint policy position on forest policy from Tasmanian environment groups.

Environment Tasmania is an umbrella body that is made up of more than 25 Tasmanian environment & conservation non-government organisations. These organisations are geographically spread right across the island state, with collective representation of more than 6000 Tasmanians.

ENVIRONMENT TASMANIA
The Conservation Council

Our native forests are of great importance. They harbour, and are key to the survival of, many of our plant and animal species. They provide ecological services such as clean water and carbon storage. And they are distinctive to our island, our identity and sense of place.

At the same time, the use of native forests in Tasmania is an issue of great controversy. Tasmanian communities historically have had a strong cultural connection to our forests. Yet it is clear that our communities have seen the need to move away from use of native forests for commodity timber products and have seen opportunities to still have a timber industry based on the large plantation estate now developed in Tasmania. Our chance to maintain employment and product manufacturing in the timber industry, and pride in our cultural heritage, lies within this transition. Our governing policies must reflect this historical moment and lead the way.

The current policy framework governing the management of Tasmania's native forests has failed to protect either the natural, cultural, amenity or economic values of these forests. In addition, it has quite possibly stifled the potential for innovation and improved management in the plantation based industry. Tasmanians are capable of much better, and indeed there is a growing recognition and desire across the State, for opportunities for positive change and solutions.

Environment Tasmania recognises that a solution to the conflict over Tasmania's native forests will require an integrated suite of measures that enhance protection of native forests and natural values while better utilising the plantation estate to support a timber industry and rural communities.

The overall forest policy outcomes are to:

- **Protect Tasmania's native forests and their biodiversity, carbon, cultural and other values.**
- **Create new economic opportunities from protecting and restoring native forests.**
- **Develop a long term, secure timber industry that is supported by the Tasmanian community and is built on our existing plantation estate and small areas of native forest.**

Policy proposals

1. **Immediate protection of old growth, high conservation value and wilderness forests.**
2. **Adjust land tenure to provide appropriate protection to public native forest.**
3. **Improve native forest protection on private land.**
4. **Develop carbon storage and capture potential of native forests.**
5. **Enhance forest and biodiversity protection through governance and regulatory improvements.**
6. **Implement a transition package to move commodity timber production from native forests to existing plantation resources and better realise the economic potential of protected native forests.**
7. **Support improvements to the management of plantations and plantation productivity.**
8. **End government market distortions – which inhibit innovation and lead to unfair competition within the timber industry and with other sectors.**
9. **Develop an integrated public land management agency for Tasmania.**
10. **Improve land and fire management practices in all forests.**
11. **Support timber industry pride, heritage and innovation.**

Policy 1. Immediate protection of old growth, high conservation value and wilderness forests.

There are areas of native forests that should be protected immediately. These are forests that have world heritage values, are old growth, have wilderness values or other important values. Collectively these are known as 'high conservation value' forests.

These high conservation value native forests should be protected immediately.

Protection of these areas will have impacts on some current business operations / plans. There will be cases where other timber sources, support or incentives are required to assist affected businesses. **Facilitate support for businesses affected by resource loss, particularly as part of the overall transition package. This support needs to be made at the individual business level, not government agency level.**

The following criteria will be considered when designating high conservation value forest:

- whole of landscape function including ecosystem connectivity and sound reserve design outcomes
- rare, threatened or endangered species and communities, high levels of endemism and refugia
- old-growth, rainforest, undisturbed and low disturbance regrowth
- identified world or national heritage values
- wild river catchments and drinking water catchments
- significant carbon stores
- high local or community significance

Apendix A shows the minimum areas Tasmania's conservation groups consider meet these criteria and that require immediate protection.

Remaining areas of public native forest will be better protected over a period of time compatible with an accelerated timber industry transition to plantation for commodity timber production. It is recognised that there is value to the Tasmanian community in ongoing

sustainable logging of small quantities of specialty native timber where that is possible for low volumes of craft and high-value timber production.

Policy 2. Adjust land tenure to provide appropriate protection to public native forest.

Long term protection and care of public native forests, and their values, outside of the current reserve system will in many cases best be achieved through formal protection as either National Park, State Reserve or Conservation Area. In other cases retaining land as State Forest, managed by a government agency independent of the commercial uses, with an appropriate regulatory regime, will be best.

A critical consideration is the role of traditional owners in the ongoing management of their forests. While some progress has been made in this area, more dialogue needs to occur with traditional owners.

National Park and State Reserve

Many landscapes that should be protected with this level of formal protection currently exist outside the Tasmanian reserve system. Community concern for these iconic and culturally vital landscapes warrants this level of protection. At the same time protecting these areas is a proactive economic strategy, potentially building new tourist magnets for communities throughout rural and regional Tasmania.

For landscapes of high conservation value, National Parks are the most appropriate level of management and protection. The land management agency must also be appropriately resourced.

Conservation Areas

These are areas with great potential carbon sequestration value, particularly where they incorporate areas of regrowth forest with opportunities to grow-in new carbon. Protected from industrial-scale logging, these zones will maintain their integrity with complementary uses such as honey production and recreational activities, as well as for ecological services such as clean water catchment, biodiversity and landscape connectivity.

For landscapes requiring forest protection but allowing for complementary uses, Conservation Area or Nature Recreation Area are the most appropriate reservation status.

State Forest

Remaining areas of public native forest, kept for low volume - high value timber harvest, restoration forestry and other uses such as water, biodiversity and recreation, would be retained as State Forest. They would need appropriate forest zoning in revised Management Plans to protect the native forests from commodity timber extraction and areas of high conservation value not captured in the other reserve categories (eg patches of oldgrowth and threatened species habitats).

Areas of native forests that have been intensively logged and seeded in recent decades will need to receive restoration treatments. This will include weeding and strategic thinning to enhance forest structural diversity, resilience, and carbon retention. There is potential in this land tenure type for joint projects involving timber companies, logging contractors , environmental consultancies and possibly even community groups. **The aim of these zones will be to restore degraded forests, increase resilience, and reconnect core reserve areas in the long term. They will also be used to provide resource in the transition process, on an ecologically sustainable basis.**

The dedication of State Forests to smaller scale sustainable extraction and to restoration for landscape values and ecosystem service purposes requires an innovative, scientifically led, landscape-scale conservation and restoration forestry program. The timber allocations from these restoration zones would form a core part of the native forests transition strategy, as part of the rapid transition of industrial sawlog operations out of Tasmania's native forests into existing plantations.

A resource assessment, with identification of native forest transition forests, will

also guide practical arrangements for a number of sawmills, as native forest logging operations are shifted across to Tasmania's existing plantations estate.

Policy 3. Native forest protection on private land.

As a first principle, native forest protection on private land will be achieved through voluntary mechanisms.

Collectively, Tasmania's privately owned forests are large, geographically dispersed, and crucial to climate and water security, landscape connectivity, wildlife habitat and biodiversity. Private forests are as important to Tasmania's future as our public forest estate.

Private forests cover over one million hectares in Tasmania, with owners ranging from single small land-owners through to large corporate entities. In 2008, the plantation estate on private land in Tasmania had reached 171,980ha while there was 885,000ha of private native forest.[1] Only 48,000 hectares is protected in formal reserves - less than 6% of the native forests on private land.[2]

Many private forests are dispersed remnants in a landscape "mosaic". The conservation and restoration of native vegetation remnants in these landscapes is crucial.

The Regional Forest Agreement set a target for the voluntary protection of 100,000 hectares of native forests on private land in Tasmania – it achieved only 38,400 hectares. Similarly, the 2005 Forest Conservation Fund targeted the protection of 45,600 hectares of native forests on private land, but at the time of the Tasmanian RFA 10 year review, only 4,300 of the 45,600 target had been achieved.

Provide mechanisms to achieve substantial increase of covenanted native forest on private land in Tasmania. Protection of native forests and the conservation values of native forests on private land will need to include a flexible mix of voluntary mechanisms and regulatory measures. However, appropriate financial mechanisms will be important for achieving a substantial area of covenanted private forest.

1 Private Forests Tasmania, October 2008, Annual report for Private Forests Tasmania.
2 Forest Practices Authority 2007, State of the Forests Tasmania. 2006

This will require the creation of a private forest conservation fund, from both Commonwealth and State funding.

These programs will continue the direction of past strategic reserve design undertaken in previous private land conservation covenanting programs.

The Private Timber Reserve System was established to give exemptions to planned forestry operations from local government planning schemes and community input. This was seen as a mechanism to provide for timber companies and private landholders to have security for forestry activity on their land.

Exemption of private land forestry operations from local council planning laws has given local communities very limited opportunity to challenge or have a meaningful say about forestry activity proposals in their vicinity. The Private Timber Reserve System also exempts property from land tax. As this exemption is not offered to many other land uses such as tourism, this has the effect of distorting land use.

As the timber industry changes, in line with the transition strategy to a plantation focus, the Private Timber Reserve System needs to be comprehensively reformed. In particular, a much higher level of strategic and integrated regional land use planning is needed, including the genuine input of local councils & local communities, to provide the strategic framework for the oversight of future forestry operations on private land.

The 10-year review of the RFA clearly identified the need for **funding of ongoing maintenance and management of private conservation reserves.** This requires ongoing government commitment for a dedicated team to provide continuous support, advice, conservation and land management expertise for landowners with covenanted private forested land.

Policy 4. Develop carbon storage and capture potential of native forests.

Managing native forests for carbon sequestration is a significant contribution Tasmania can make to the global goal of reducing atmospheric CO^2. It is a new and potentially key element of providing a long term solution to the forest industry conflict in Tasmania as it would provide significant income stream for both public and private forests in Tasmania.

As part of this the Tasmanian Government must have more detailed carbon auditing. A key feature of the marketability of any forest carbon is going to be the transparency and accuracy of measurements of actual carbon stored and retained.

Managing fire in forests will also be a central challenge of trading carbon in native forests. **A larger commitment from state and federal government should be made to R&D on managing fire in native forests and in particular to how this relates to carbon retention.**

Policy 5. Enhance forest and biodiversity protection through governance and regulatory improvements.

RFA

There are a number of possible pathways for the protection of Tasmania's native forests and a resolution to the conflict over public forests in Tasmania.

The Regional Forest Agreement (RFA) is an agreement between the State and Commonwealth governments on the management of Tasmania's forests estate. The Tasmanian Regional Forest agreement has been changed once (for the worse – it undermined RFA credibility in threatened species protection). Therefore, it could be changed again via cooperative agreement between both governments. The Tasmanian government could move to protect forest areas, the Commonwealth government could move to re-involve itself in the proper management and protection of Tasmania's forests, or a mixed or bilateral response could be achieved.

The preferred pathway would be a cooperative approach between the State and Federal governments that supports a full resolution of the Tasmanian forests issue.

A simple solution might involve changing the Tasmanian Regional Forests Agreement in line with the modification of the Supplementary Tasmanian Regional Forests Agreement. The basic structure of the RFA was left intact, but a modification of the agreement was put in place.

Another approach might involve removal of the RFA altogether, with a new management framework developed. The merit of this might lie in recognising that the RFA was an instrument developed primarily to balance native forest timber production with conservation. However in transitioning timber production to plantations in line with this policy, it might be best to develop a new agreement altogether.

Native forest biomass and renewable energy

The current Renewable Energy (Electricity) Act 2000 has 'wood waste' listed as an eligible renewable energy source, whilst fossil fuels or materials or waste products derived from fossil fuels are listed as ineligible energy sources.

This means that, under current regulations, the logging of native forests and burning of native forest biomass in a wood-fired power station, can be fed into the electricity grid as 'renewable electricity'.

However, logging of native forests releases vast quantities of greenhouse gases into the atmosphere. Further significant quantities of CO^2 would be released into the atmosphere via the burning of wood waste in the furnace, whilst there would also be substantial emissions contained in the transport of materials to native-timber fired furnaces.

This policy loop-hole needs to be closed. **Native forest biomass should be listed as an ineligible 'renewable' energy source in any renewable energy legislation or policy.**

The adoption of comprehensive and fair land-clearing legislation

Land-clearing is the permanent destruction of native forest or vegetation and replacement with non-native species or materials. It is the single greatest threat to our wildlife. In the last decade Tasmanian has had the record for the highest rate of land clearing in Australia. [3] Whilst the 'Policy for Maintaining a Permanent Native Forest Estate' is committed to the end of broad-scale clearing of native forest on public land by 2010, and the clearing of native forest on private land by 2015, there is no legislation to back up this policy, nor is there any comprehensive legislation to prevent the clearing of non-forest vegetation.

Environment Tasmania proposes that, in

3 In 2000 Tasmania had a rate of land clearing (measured as area of native vegetation cleared as a proportion of the states total land area) that was the highest of any state in Australia (0.248%, just marginally higher than Queensland (0.245%) and twice the next highest rate in NSW(0.125%). Sourced from ACF report Australian Land Clearing, A Global Perspective: Latest Facts & Figures March 2001, and ABS data for state land areas.

line with other Australian states, Tasmania must adopt legislation to protect native vegetation and to enforce the cessation of land clearing. Adequate resourcing to ensure enforcement needs to be provided.

The Environment Protection & Biodiversity Conservation Act.

The Environment Protection & Biodiversity Conservation Act 1999 (EPBC) is Australia's premier biodiversity protection legislation. It is the principle act of Commonwealth legislation providing for the protection of threatened species, World Heritage, National heritage and other national environmental values and requiring fulfilment of international obligations to protect these values.

However, logging operations within Regional Forest Agreement areas are currently exempt from the jurisdiction of the EPBC Act, meaning that logging in native forests in Tasmania, for example, is allowed to occur in a manner that pushes nationally listed threatened species towards extinction.

Remove statutes that exempt RFA logging operations from the jurisdiction of the EPBC.

Policy 6. Implement a transition package to move commodity timber production to a plantation resource base, and better realise the economic potential of protected native forests

Tasmania now has a unique opportunity to create a long term resolution to the conflict over resource allocation of its native forests.

It will be possible to have a stable and secure timber industry providing timber products and jobs built on commodity timber supplied entirely from our existing plantation resources within a decade. This would allow protection of all of Tasmania's high conservation native forests and use of the remaining native forests for high value uses such as recreation, tourism, biodiversity conservation, water catchments and carbon sequestration.

The extensive establishment of plantations in Tasmania in recent years has been highly controversial – particularly the conversion of native forests to plantations. However, now that Tasmania has nearly 300,000 hectares of plantations in the ground, this plantation estate provides a unique opportunity to support our timber industry into the future.

This is a critical development which has changed the dynamic and now allows the implementation of a policy to protect native forests while guaranteeing a strong, secure and innovative timber industry. This opportunity did not exist when previous attempts were made to resolve the forest conflict.

Tasmania must take this opportunity to transition to a world class and highly productive forest industry built on the innovative utilisation of plantation timber in Tasmania and to manage native forests for other more sustainable, and higher value uses.

Sound, scientifically based planning would allow native timber industries to make a viable transition to existing plantation timber and restoration forestry in strategic phases, whilst allocating a small area of native forest for high value,

low volume timber production.

There is a need to support the unique role that Tasmania's speciality artists, boat-builders, furniture-makers and craftsmen play in the Tasmanian community, and the valued place that Tasmania's native timbers play within that role. **Environment Tasmania supports the ongoing use of small volumes of Tasmania's native forest timbers for these high-value end uses. Appropriate mechanisms would need to be put in place to ensure the limited extraction of native forest specialty timber species to supply this industry. At the same time it is imperative that in the long term ways are found to develop plantation derived specialty timbers.** As subsidised native forest timbers cease to become available, the farm forestry sector will have greater incentive to innovate and commit to long term small scale investment in specialty timbers. It is also important to support the positive branding of plantation timbers as specialty timber products that can be used in high value applications.

Tourism Operations

In strategic locations it might be appropriate to develop visitor service sites or even zones and to develop an appropriate suite of facilities normally associated with national parks such as trailheads, walking tracks, carparks, camping areas and in some cases a visitors centre. Commercial accommodation facilities and other types of more intensive tourism development are inappropriate in reserves of these categories.

IUCN category IV reserves and State Forest are more appropriate for commercial tourism activity. But even then it must be conducted in a well planned and limited manner.

Tourism opportunities exist here for well-managed and controlled licenses, including standing camps, huts, small lodges and adventure tourism attractions. Private tourism licences would be managed, approved and governed by the land management agency using, an;

- an open competitive tender
- minimal environmental footprint developments
- utilising existing cleared sites and access points, avoiding new roads and clearing of undisturbed sites
- a bond for rehabilitation where necessary
- lease fees to be returned directly back to Parks / the Environment Department for management costs, including rangers, conservation work and public infrastructure maintenance on a full-cost recovery basis
- adequate resourcing to oversight lessees
- protection of natural values, full environmental impact assessment and a public consultation process prior to lease approval

Policy 7. Support improvements to the management of plantations and plantation productivity.

Plantation grown timber offers economic advantages over native forest sourced timber. For example, plantation sourced wood fibre is superior to native forest wood fibre in paper production. The building industry now makes extensive use of plantation sourced timber products in construction for its low costs, easy workability, stability and lightness. Saw-millers are able to more efficiently process plantation timber that has a much higher degree of uniformity than native timbers.

It is recognised that Tasmania's existing plantation estate (over 270,000 hectares in 2008) will provide a key part of the solution to the conflict over the industrial scale logging and wood-chipping of Tasmania's native forests by being able to replace native forest products. The recent expansion of the plantation estate means that over the next several years almost the entire timber production volume from Tasmania will be able to be replaced by plantation derived timbers. This represents an unprecedented opportunity to end commodity timber production from native forest while supporting new timber industry growth and innovation. **Environment Tasmania proposes that, as a part of a reshaping the timber industry to protect native forests, optimal use of the existing substantial plantation resource for timber products be achieved.** This may mean developing longer rotations, pruning for clearwood, and thinning for better timber, to deliver higher value products such as sawn timber from timber plantations, rather than having plantation management focussed largely on woodchip production.

In the past decade considerable plantation has been established on land that has been cleared of native forest, a practise that is highly controversial. Plantations are not forests. Plantations are planted specifically for the purpose of timber production and as opposed to native forests have poor biodiversity, wildlife, carbon and landscape values.

Plantations are not a panacea and can and do cause significant environmental problems. **Concerted actions are needed to mitigate these problems, including:**

- An end to the pesticide and herbicide contamination of land and water systems
- Retention of highly productive agricultural land for food production.
- End the use of 1080 to control pests.
- Recognition and protection of rural and natural landscape values.
- Development of an integrated catchment management framework to protect and restore water yields and quality.
- Protecting Tasmania's eucalypt species from genetic pollution

Plantation timber growers need to improve the management of plantation forests in these areas. **As a part of this process, it is proposed that the plantation industry in Tasmania goes through a review process to achieve the highest certification standards, socially acceptable management, and other recognised good management practices for plantation forests.**

There needs to be increased support for plantation innovation and value adding. Opportunity should be taken at rotation turnover to diversify with suitable species in consultation with sawmillers, silvicultural research scientists and other stakeholders.

In some cases environment groups would like to see **consideration be given to areas of plantation in otherwise expansive areas of high conservation value forest restored to native forest.**

A critical part of long term commercial sustainability is that **the plantation industry not receive the significant tax breaks, or other financial subsidization of commercial plantation establishment it has received in the past.** This has distorted markets of the timber industry, other agricultural markets and property markets to the detriment of them all. In addition it has led to and is likely to continue to lead to plantation establishment on inappropriate lands that would otherwise not be viable.

Policy 8: End government market distortions – which inhibit innovation and lead to unfair competition within the timber industry and with other sectors.

The management of Tasmania's forests on public land is currently heavily subsidised by a range of direct and indirect subsidies, whilst logging companies are also subsidised by direct government handouts, tax-breaks, special regulations and other mechanisms.

The timber industry always has and always will be an important part of Tasmania's economy, but it should stand on its own two feet. Ongoing subsidy of native forest logging on public land inhibits investment in innovation and downstream processing in the plantation sector at the expense of native forests.

In addition subsidies to the Tasmanian wood-chipping sector distort the market and allow the industry to out-compete more competitive and jobs-rich sectors such as agriculture and tourism.

End the 300,000 cubic metres legislated requirement from State Forest. Forestry Tasmania currently has a legislated requirement to provide a minimum of 300,000 m3 of veneer or sawlog from public forests each year. What is clear is that the recent expansion in eucalypt plantation means that this could soon be replaced (particularly with ongoing investment in thinning / pruning and new technologies in composite and laminated structural timber products manufacture from plantation timber).

Restructure Forestry Tasmania Business

A key element of a transition package would be the **restructure of Forestry Tasmania's business functions.** As has already been noted the land management functions would be best incorporated with the land management agency functions of the Parks and Wildlife Service.

There would still be a role for a forestry management agency in managing the extraction of specialty timbers for the foreseeable future, the growing and sale of timber from publicly owned plantation

forests, bee-keeping licenses, and certain restoration forestry works.

Current commercial tourism operations on State Forests to be either sold or managed by a Tourism Government Business Enterprise 'Forest Tourism Tasmania'

There should be a clear delineation between the delivery of a public service / public good, vs a commercial enterprise in State Forests in Tasmania. As outlined earlier in this policy document, Environment Tasmania does see a role for very well managed, well controlled sensitive private tourism leases in identified forest tourism zones in Tasmania.

Environment Tasmania proposes that current commercial tourism operations in State forest in Tasmania currently owned and operated by Forestry Tasmania should either be sold or managed by the new land management agency.

MIS Tax Breaks

There has been a growing roll-out of MIS plantations on agricultural land at the expense of legitimate agricultural activities and the environment. These schemes distort markets for timber, agriculture, and property, to the detriment of rural Tasmania.

Environment Tasmania recommends an end to MIS tax subsidies. It is proposed that the multi-million dollar revenue savings is diverted into a rural & regional land conservation and restoration fund for jobs-intensive community conservation, land-care and restoration projects. Similarly, we recommend that the land tax breaks for private timber reserves be brought into line with the rest of the rural sector.

Policy 9. Develop an integrated public land management agency for Tasmania

Currently public land with protected values is managed by three agencies, Forestry Tasmania, Parks and Wildlife Service and Crown Land Services. This leads to duplication of processes and services. It is proposed that these government functions be integrated into one agency to provide for efficiencies and better conservation management.

In the process of this change, informal reserves would be formalised, and proposed Crown Land Assessment and Classification Project (CLAC) reserves proclaimed and added to the reserve estate.

This reform will mean that a number of specific land management and policy roles currently housed by Forestry Tasmania, will be transferred across to a single, properly resourced land management agency.

Functions that would be shifted from Forestry Tasmania to the agency include land use policy for state forest, and the management and control of all State Forest

This new agency would also undertake ongoing work to develop whole of landscape conservation strategies across Tasmania. (eg in accordance with the National Forest Policy Statement, the Environment Department will ensure the existence and/or development of; "effective corridor systems [to] link reserves, refuges and areas with a relatively large range of altitudinal and other geographical variation so as to take into account the likely impacts of climate change.")

Absorb the functions of the Forest Practices Authority into a strengthened and well-resourced Environment Protection Agency. This will ensure that there is an EPA with state-wide jurisdiction over environmental regulatory matters. There are inherent conflicts of interest in a separate regulatory regime for only one component of Tasmania's environment. At the same time, it is important to note that there are significant skills and institutional

knowledge contained within the FPA which would be underutilised as the timber industry moves from native forests across to existing plantations. Integration of these skills into the EPA would provide better environmental planning for all sectors of the Tasmanian community. Synergies and shared resources between personnel, will also encourage greater likelihood of forestry activity being best integrated with other land use regimes and planning.

The review will include the following:

- Revision of the Forest practice Code
- Policing and enforcement of forest practice plans
- Integrated catchment management.

Provision of an Environment, Parks & Biodiversity Protection Tribunal

A tribunal to replace the role of the forest practices tribunal with a wider gambit and broader community representation, to provide a mechanism for appeals to decisions in relation to land management, parks, or the EPA.

For example, if a party is aggrieved at a Forest Practices plan decision, change to the Forest Practices Code, an appeal can be made to the tribunal.

Policy 10. Improve land and fire management practices in all forests.

Day to day management of the state's forests is critical to their long term health. Beyond immediate threats from industrial timber extraction, are a range of impacts that degrade protected forests. These include weeds, over-visitation, wood-hooking, recreational vehicle abuse, feral animals and fire.

In addition to being threats to many of the natural values of protected forests, these threats are also a risk to the timber industry and its plantation resources – especially fire.

There is an ongoing need to develop and refine fire management strategies to protect and enhance ecological and economic values across the Tasmanian landscape.

Public land managers must be better resourced and supported by policy and regulation, to effectively manage these issues. In addition there is a need for ongoing support to private landholders to manage these threats on private land.

Providing better resourcing to public land managers to care for forests and the many benefits they deliver will provide additional employment in rural areas of Tasmania as well as the flow on benefits of healthier forests for all Tasmanians.

Policy 11. Support forests and timber industry pride, heritage and innovation.

Along with our native forests, Tasmania's timbers and the timber industry are an important source of pride and sense of well being for our state and communities. It will be important in any transition to find ways to build on this heritage.

Protection and promotion of the historic heritage of forest industries and cultural values of forests will be critical. But equally important is the living cultural values of forests and our timber industries, especially in some rural communities and amongst the Tasmanian Aboriginal community. **This will include the development of regional strategies to build local pride and identification with our forests, cultural landscapes, Indigenous heritage, historic heritage and timber industry heritage.**

Appendix A - Mapped High Conservation Value Forests in Tasmania

The map shows the ENGO identified forest areas of high conservation value (HCV) that require immediate protection.

They are the outcome of many different and often overlapping processes that have been carried out by governments, community groups, scientists and World Heritage authorities. over many years.

Broadly the following criteria have been applied in determining these areas:

- Large intact natural forest areas;
- Forests with high levels of ecological maturity;
- Forest areas of importance to local, national and international communities;
- Forests and ecosystems with high biodiversity values;
- Reserve design principles including buffering and ecological connectivity; and
- Forests with high ecosystem service importance (eg carbon rich forests, water catchments).

A summary of the specific processes that led to the identification of major HCV areas are shown on the table (right). Consultation with ENGO groups around the state has also contributed to the mapping.

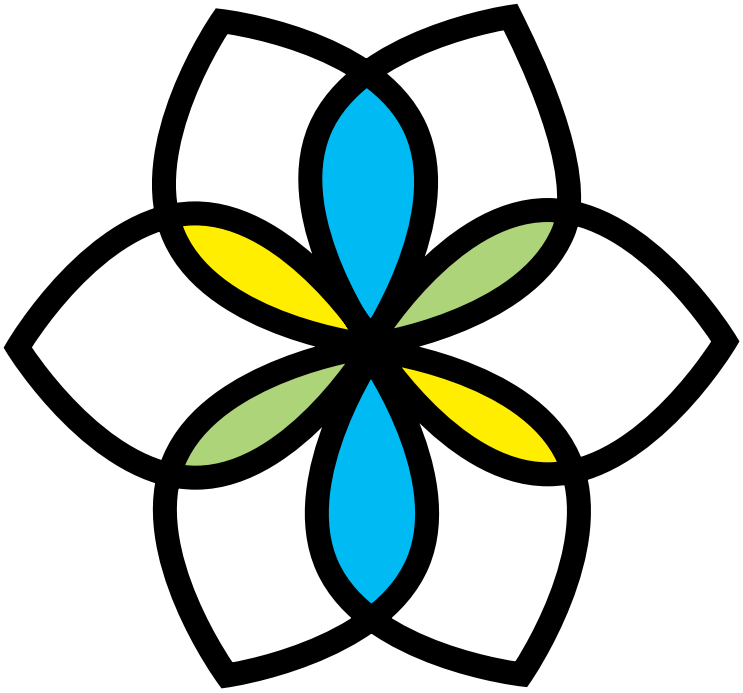
Informal reserves are included as they are considered inadequately protected and their inclusion here reflects the seeking of full, formal, legislated protection.

There are many limitations to the quality of data made publicly available for use in this process and errors will exist, such as areas that have been destroyed or degraded in recent years. In addition it is also likely that areas not identified here that meet the above criteria have been missed and should also be considered when the information becomes available.

Some areas, whose values have been severely impacted by logging, or conversion but are located inside a contiguous area of HCV forest reserve proposal are retained to be rehabilitated as are some areas for establishing connected conservation reserves or delivering world heritage recommendations.

HCV Area	Processes of HCV identification
Proposed extensions to the Tasmanian Wilderness World Heritage Area (TWWHA) (includes Styx and Great Western Tiers, as shown on PFGJ maps) This is one of the world's great temperate wilderness areas and includes sections of the Great Western Tiers, Upper Derwent, Navarre, Counsel, Florentine, Wedge, Tyenna, Styx, Weld, Snowy range, middle Huon, parts of Picton, Esperance and Lune catchments. These are the areas that contain the most timber/pulp resource of all the HCV areas	National Estate listing (Government body: Australian Heritage Commission, 1980s) Helsham Commission of Inquiry 1987-88 and consultants International World Heritage experts, including IUCN, ICOMOS, World Heritage Centre and World Heritage Committee (includes official representatives of Government signatories to international treaty) Panel of Experts (Tas. Forests and Forest Industry Council – conservation groups, industry, scientists in 1990) Tasmanian Department of Parks, Wildlife and Heritage (Government, 1990) Sundry reports on threats to integrity of TWWHA (Australian Government 1993; Australian Government consultants, 1994 and 1995) Great Western Tiers National Parks proposals (community groups, 1990 and 1995) Sundry reports as part of Regional Forest Agreement process (inc. Governments' Panel on World Heritage values, 1997) Tasmania Together process (Tasmanian Government) 2000 Promises by Australian Government, October 2004 Hitchcock report 2008
Tarkine (includes most of the HCV forests of north-west Tasmania)	Scientific consultants engaged by Tasmanian Conservation Trust (Forgotten Wilderness, 1992) National Estate listing (Government body: Australian Heritage Commission, 1990s) Tarkine National Coalition proposals 1995-2004 (representing the Wilderness Society, ACF and local groups) Calls for World Heritage investigation by IUCN (1990s) Tasmania Together process (Tasmanian Government) 2000 Sundry reports as part of Regional Forest Agreement process (inc. Governments' Panel on World Heritage values, 1997)

Ben Lomond	National Estate listing (Government body: Australian Heritage Commission, 1980s) (part) Submissions to Regional Forest Agreement (TCT, 1996) Tasmania Together process (Tasmanian Government) 2000 Proposed Ben Lomond National Park (Wilderness Society, 2000)
North-East Highlands, including extensions to Blue Tier, Mt Victoria and Mt Arthur reserves and Panama Ridge	Submissions to Regional Forest Agreement (TCT, 1996) Proposal for a North-East Highlands National Park (community group 1998, revised 2008) Tasmania Together process (Tasmanian Government) 2000 Linking Landscapes Project (community groups and TWS 2007)
North-East Tasmania, including Mt Barrow, Mt Horror, Mt Cameron, Constable Creek – Loila Tier, Fingal Tier, Evercreech, St Patricks River	Linking Landscapes Project (community groups and TWS 2007)
Eastern Tiers, Wielangta, Reedy Marsh, Tasman Peninsula, Bruny Island and other small areas	Scientists as part of Forests and Forest Industry Council, 1990 Community groups, 1990s Tasmania Together process (Tasmanian Government) 2000 Swift parrot breeding surveys and subsequent reports
Leven Canyon and Black Bluff	Community groups 1970s and 1980s Canyon and Bluff Working Group (The Canyon and the Bluff, 2003) and support from widespread community groups, 2003 Forestry Tasmania moratorium 2003



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THE WILDERNESS SOCIETY

NATIONAL FOREST & WOODLAND POLICY PRINCIPLES

OCTOBER 2005
AMENDED 2007

The Wilderness Society
National Forest & Woodland Policy Principles

Preamble

This document provides a broad set of national forest policy principles that underpin specific proposals prepared by National and State Based Campaign teams to meet the broad purpose of The Wilderness Society:

'To protect, promote and restore wilderness and natural processes across Australia for the survival and ongoing evolution of life on Earth'

Our aspiration for Australia's Forest and Woodlands:

'The forest and woodlands of Australia should be maintained and/or restored with their full complement of native species and ecosystems in their natural patterns of distribution and abundance where necessary to achieve The Wilderness Society's purpose.'

1 Definitions

Forests have been variously defined in Australia since the 1970's and these definitions have broadened over time to encompass more and more of the continents perennial woody vegetation[1]. Plantations and timber commodities have been separately defined below.

1a Forest and woodland

All of the definitions have validity for the context in which they were written. The Wilderness Society accepts a broadened structural definition of native forest written for National Forest Inventory.

'. . *an area, incorporating all living and non-living components, that is dominated by trees having usually a single stem and a mature or potentially mature stand height exceeding 2 metres and with existing or potential crown cover of over-storey strata about equal to or greater than 10 per cent. This definition includes Australia's diverse native forests regardless of age. It is also sufficiently broad to encompass areas of trees that are sometimes described as woodlands*.'[2]

The Wilderness Society has removed plantations from this definition and expanded the woodland class by dropping the canopy cover percentage to 10%. The Wilderness Society accepts the biological definition of native forest written for the National Forest Policy Statement[3].

1b Timber Commodities

Timber commodities are usually considered to be solid wood or composite materials (eg chip board or medium density fibre board, with or without timber veneers) used to produce the following: formwork, floor bearers, floor joists, floor boards, wall frames, roof frames, ceiling frames, roof and

other structural trusses, architraves and skirtings, facia boards, internal linings, internal doors, internal joinery, external cladding, window frames, pergolas, decks, external joinery, veranda posts and beams, external doors and fencing, wharves and jetties, pallets, bridges, poles, piles and sleepers. This list is not necessarily exhaustive.

Fine furniture timbers, boat-building timbers and craft-wood are not considered to be timber commodities for the purpose of this policy.

1c Plantations

Plantations are defined in the National Forest Policy Statement[3]. "Intensively managed stands of trees of either native species or exotic species, created by the regular placement of seedlings or seed.

2 Overarching Principles:

The Wilderness Society subscribes to a set of overarching principles that underpin this and other policies. These principles are set out in summary or in full below.

2a The Precautionary Principle

"In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. When there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation"[4]

2b Intergenerational Equity

"Sustainable development seeks to meet the needs and aspirations of the present without compromising the ability to meet those of the future."[5]

2c WildCountry Principles[6]

WildCountry Scientific Principles

The WildCountry scientific framework is founded on the premise that the conservation of biodiversity and related natural heritage values demands a landscape-wide approach to conservation that recognises the importance of ***ecological connectivity*** at continental and regional scales.

The processes that sustain and regenerate ecological systems operate across a range of time scales and spatial scales. Many, if not most, work at spatial and time scales that far exceed those at which humans perceive, use and manage land and natural resources. Thus, many important ecological processes involve connections at scales not considered by conventional conservation planning and management.
Protection of Australia's biodiversity into the long term is therefore more probable through conservation based on a multi-scaled, landscape and process based framework.

Three key concepts are potentially relevant to the WildCountry scientific framework, namely:

(1) continental and regional connectivity of ***large core areas*** is required to support the long-term conservation requirements of spatially extensive ecological processes;

(2) ***complementary land management*** in surrounding landscapes; and,

(3) where necessary, ***restoration of natural processes*** and disturbance regimes, the control of invasive species, and the reintroduction of native species.

Seven processes of *ecological connectivity* relevant to WildCountry **have been identified:**

1. Strongly interactive species
top-down regulation; role of predators in ecosystem structure.

2. Hydro-ecology
dependencies between vegetation, water and animal habitat; e.g. refugia.

3. Long distance biological movement
especially for migrants and dispersive/nomadic species.

4. Fire regimes
understanding fire as an ecological management tool.

5. Climate change and variability
impacts on species distributions/habitat, and ecosystem dynamics.

6. Land / coastal zone fluxes
e.g., catchments transporting water and nutrients from inland to coastal ecosystems.

7. Long-term, spatially-extensive evolutionary processes
Because speciation often involves range expansion followed by isolation and differentiation, this evolutionary process is usually dependent on habitat continuity and movement over relatively long distances.

2d Earth Charter

The preamble to the Earth Charter is set out below and the full document can be found at:
http://www.earthcharter.org/files/charter/charter.pdf

PREAMBLE
We stand at a critical moment in Earth's history, a time when humanity must choose its future. As the world becomes increasingly interdependent and fragile, the future at once holds great peril and great promise. To move forward we must recognize that in the midst of a magnificent diversity of cultures and life forms we are one human family and one Earth community with a common destiny. We must join together to bring forth a sustainable global society founded on respect for nature, universal human rights, economic justice, and a culture of peace. Towards this end, it is imperative that we, the peoples of Earth, declare our responsibility to one another, to the greater community of life, and to future generations.

Earth, Our Home

Humanity is part of a vast evolving universe. Earth, our home, is alive with a unique community of life. The forces of nature make existence a demanding and uncertain adventure, but Earth has provided the conditions essential to life's evolution. The resilience of the community of life and the well-being of humanity depend upon preserving a healthy biosphere with all its ecological systems, a rich variety of plants and animals, fertile soils, pure waters, and clean air. The global environment with its finite resources is a common concern of all peoples. The protection of Earth's vitality, diversity, and beauty is a sacred trust.

The Global Situation

The dominant patterns of production and consumption are causing environmental devastation, the depletion of resources, and a massive extinction of species. Communities are being undermined. The benefits of development are not shared equitably and the gap between rich and poor is widening. Injustice, poverty, ignorance, and violent conflict are widespread and the cause of great suffering. An unprecedented rise in human population has overburdened ecological and social systems. The foundations of global security are threatened. These trends are perilous—but not inevitable.

The Challenges Ahead

The choice is ours: form a global partnership to care for Earth and one another or risk the destruction of ourselves and the diversity of life. Fundamental changes are needed in our values, institutions, and ways of living. We must realize that when basic needs have been met, human development is primarily about being more, not having more. We have the knowledge and technology to provide for all and to reduce our impacts on the environment. The emergence of a global civil society is creating new opportunities to build a democratic and humane world. Our environmental, economic, political, social, and spiritual challenges are interconnected, and together we can forge inclusive solutions.

Universal Responsibility

To realize these aspirations, we must decide to live with a sense of universal responsibility, identifying ourselves with the whole Earth community as well as our local communities. We are at once citizens of different nations and of one world in which the local and global are linked. Everyone shares responsibility for the present and future well-being of the human family and the larger living world. The spirit of human solidarity and kinship with all life is strengthened when we live with reverence for the mystery of being, gratitude for the gift of life, and humility regarding the human place in nature.

3 Conservation

The Wilderness Society recognises that meeting long-term conservation objectives for Australia’s forests requires a reservation network on public land and conservation management arrangements on private and leasehold land.

3a Public Land Reserves

The Wilderness Society will help develop proposals for and campaign to have implemented a comprehensive (and where possible connected) forest reserve network across the continent. This has to be capable of being maintained into the future in order to secure the full range of ecosystem

services that these forests provide. These forests should be in National Parks and other secure reserves. The Wilderness Society is preparing a reserve management policy.

The Wilderness Society recognises that a priority for reservation should be given to forest ecosystems that have one or more of the following characteristics:

- Satisfy the WildCountry Science Principles
- rare, threatened or endangered, or contain centres of endemism;
- old-growth;
- forested wilderness;
- Rainforest (including with emergent eucalypts);
- undisturbed / negligibly disturbed mature forests;
- highly (biologically) productive;
- have been identified as core habitats for local endemic, rare, threatened and endangered species;
- have been identified as having world heritage or of national heritage value;
- are located in areas with steep climate gradients;
- or form part of domestic supply or Wild River catchments.;
- refugia and/or of evolutionary significance;
- are significant carbon stores and;
- areas of high cultural and social significance.

These are the High Conservation Value (HCV) forests.

3b Private land conservation

The Wilderness Society recognises that in order to secure long-term conservation objectives a range of measures need to be implemented with the cooperation of private landowners, governments and environmental non-government organizations. These will include:
Land purchases; private nature conservation reserves, appropriate regulatory measures, conservation covenants, conservation management agreements, incentive packages and voluntary conservation programs like Land for Wildlife.

These measures are needed to help provide connectivity in otherwise fragmented landscapes.

4 Forest Restoration

The Wilderness Society recognises that many of Australian forest landscapes and ecosystems are either significantly fragmented by clearance and or highly disturbed by intensive forest use. In order to maintain ecosystem processes at the regional and landscape scale and or achieve good reserve design outcomes, areas of disturbed and or cleared land will need to be restored.

A suite of tools will need to be used to achieve this outcome. Restoration forestry[7] ecological revegetation and remnant vegetation protection are all possible tools.

5 Forest Land Management

5a Land clearing

The Wilderness Society is opposed to the broad acre clearing of native forest for any purposes. Despite the undertaking's given by all State Premiers and the Commonwealth in the National Forest Policy Statement and other bilateral agreements with the Commonwealth, forests are still being cleared although this is closely regulated in most jurisdictions except Tasmania and the Northern Territory where plantation conversion of native forest is still a major driver of land clearance.

5b Forestry

The Wilderness Society does not support the use of native forests to supply woodchips for pulp, wood for power generation, charcoal production, commercial firewood or timber commodities.

The Wilderness Society will support sustainable traditional indigenous use of timber and locally sourced wood for low volume housing needs.

The Wilderness Society does not believe that there is a native forest logging systems in use in Australia that has been proven to be ecologically sustainable, in terms of the full range of ecosystem services provided by forests that are in a natural state, over the natural life cycle of those forest ecosystems.

It is acknowledged that the lower the intensity and frequency of logging events the lower the likely overall impact of the disturbance. On the basis of this understanding The Wilderness Society is prepared to examine proposals to log very small volumes of wood for high value products outside proposed reserves – preferably as part of a transition strategy to rely on purpose planted trees and only if all commodity production from those areas has ceased.

The Wilderness Society recognises that transition strategies are required both to provide wood flows while industry restructures to alternatives from plantations and that areas of heavily logged forest outside of reserves in some cases will require ecological management interventions such as thinning of stands where trees have effectively stopped growing because of competition for water and nutrients (restoration forestry). This would continue to provide significant wood flows in some regions in the short to medium term.

The purpose of any interventions would be to increase the diversity of forest age structures and ecological functionality.

5c Mining

Where the removal of vegetation as part of mining operations is inevitable, TWS will not oppose traditional owners recovering wood.

6 Plantation Management and Establishment

The Wilderness Society believes that all of Australia's pulpwood, commercial firewood and timber commodity production should come from extant plantations of softwood and hardwood and that this would deliver higher rates of return to State Forest agencies than maintaining wood flows from crown native forests[8].

In many areas of Australia it will not be appropriate to establish plantations until current serious plantation management issues are addressed. Indeed there will be areas of plantations which will need to be restored to as close to native forests as possible.

In other areas plantations can be an important part of ecological restoration processes, including those planted for commodity production.

Current plantation management practices, particularly as they relate to post land-clearing establishment, are unacceptable. A series of concerns in respect of these issues have been a matter of public record since 1990[9]

The Wilderness Society does not support any use, including aerial application, of: the triazine group of chemicals, synthetic pyrethroids, any of the other chemicals with known human or ecological toxic impacts, or 1080 poison baiting for herbivores.

Similar concerns have been raised in respect of the genetic pollution of native forests either as a result of plantation species invading native forest or the more insidious problem of genetic contamination of native gene pools with genetically modified, exotic or non-local provenances of commercial species. These issues need to be recognised in species and site selection for plantings.

Catchment management issues relating to plantation establishment, rotation length and watercourse protection need to be addressed. The Wilderness Society believes that water quantity and quality outcomes must take precedence over wood supply outcomes.

The Wilderness Society will work with the plantation sector to help address all of these sustainability issues.

7 Forest Certification

Forest Certification is a branding exercise that gives timber producers access to markets or very rarely a price premium in the market. The best certification schemes have criteria, which if properly applied can deliver certainty that the management system certified has been delivered. Only one forest certification scheme FSC[10],[11] (Forest Stewardship Council) currently allows environmental NGO-stakeholders access to the accreditation process. Certification schemes are not a guarantee of environmental outcomes and in many cases merely certify the status quo for legal but very bad forestry practices. The Australian Forestry Standard (AFS) is such a scheme, claiming that it establishes that AFS certified wood comes from sustainably managed forests[12].

The Wilderness Society does not support or recognise the validity of the Australian Forest Standard. There are other brands, which from time to time make environmental claims that either mean nothing or are misleading. The Wilderness Society will publish material in respect of these brands when appropriate[13].

The Wilderness Society recognises and supports the accreditation of plantations and plantations undergoing restoration that meet the criteria for FSC Certification but not where certified companies have interests in the logging of High Conservation value forests.

This support is not meant to condone bad chemical governance by an accredited company. The Wilderness Society is not making a claim that certification equates to ecological sustainability.

The Wilderness Society encourages those purchasing wood sourced from developing countries to choose FSC labelled products as this provides guarantees as to the legality and intensity of the logging and could help reduce logging pressures in these countries if widely adopted as a purchasing preference.

The Wilderness Society does not believe that there is currently any native forest logging systems in Australia that could be legitimately environmentally branded. Wood taken from native forest restoration and or low intensity forestry (see 5b above) might be appropriate for accreditation once regional high conservation value forest reservation outcomes have been met.

8 Forests and Climate[1]

Deforestation (landclearing) accounts for at least 18% of current global CO_2 emissions. Forest degradation (logging and burning) is also a major contributor. Avoiding deforestation and forest degradation will be crucial if we are to prevent dangerous climate change (i.e. avert more than a two degrees Celcius rise in average global temperatures).

Australia contains some of the most carbon dense forest and woodland ecosystems in the world. Logging and land clearing in Australia contribute substantially to our national emissions of CO_2. [2]

The Wilderness Society endorses the need for Australia to have an agreed long term binding target for the reduction of all greenhouse gases. The Wilderness Society in line with most Australian environmental non-government organisations supports emissions reductions of 30% by 2020, rising to a reduction of 80% by 2050 (based on 1990 levels).

There are a number of mechanisms, instruments and policy protocols that would help avoid the worst impacts of climate change. Ratifying the Kyoto Protocol is an important part of a suite of approaches to deal with this urgent problem.

The Wilderness Society supports initiatives[3] to purchase legal forestry use rights for conversion to legal carbon sequestration rights on public and private land. These initiatives could operate independently of any mandatory emissions trading schemes.[4] Initiatives should be based on a robust set of principles and criteria; and have robust governance structures that are open, transparent and participatory. Measurement and/or estimates of stored carbon need to be scientifically rigorous.

Short rotation pulp plantations grown on cleared agricultural land offer very limited opportunities to sequester carbon unless management practices are significantly changed to retain carbon *in situ* at

[1] TWS is developing a stand alone policy on Climate Change and Native Vegetation.

[2] See "*Trees the Forgotten Solution to Climate Change*" for updated figures on Australian logging and land clearing contribution to avoidable carbon dioxide (CO_2) emissions.

[3] The necessary legal and accounting architecture needs to be established in Australia to enable such forest protection initiatives to be undertaken systematically.

[4] Such "voluntary" initiatives can serve as pilot projects providing important learnings that could apply to their eventual inclusion in emissions trading schemes as the carbon market matures.

harvesting. As the net contribution to CO_2 reduction over the cropping period is low, they should not form part of any emissions trading scheme developed for Australia.

The Wilderness Society (in line with forest definitions established under the Kyoto protocol) recognises that plantations established on native forest sites cleared post-1990 are net sources of very significant emissions and should never be eligible to receive carbon credits in any emissions trading schemes.

Under no circumstances should forest products, e.g. sawntimber, be credited as stored carbon in emissions trading schemes. Such an approach does not account for the emissions resulting from the logging operation which produced the wood product. Such partial accounting can create perverse incentives to log that result in greater carbon emissions and a worse climate outcome.

The purchase of clearing permits in Australia for carbon credits[5] has established a model which demonstrates the economic feasibility and validity of converting one land use right to another. In Australia, the opportunities for both biodiversity protection and climate mitigation from converting destructive land-use options into rights to sequester carbon are enormous.

As well as the obvious ecological benefits there may be significant opportunities for carbon sequestration in broad scale landscape restoration. The economic opportunities, landscapes involved and timescales associated with the purchase of carbon rights of these types of projects will be closely examined as appropriate.

In particular, Indigenous Australians who own or hold rights over millions of hectares of forests and woodlands around Australia, and who are under increasing pressure to approve the clearing of those forests and woodlands, should receive economic benefits from the protection of those forests and woodlands and their carbon and biodiversity values.

9 Peaceful Protests

The Wilderness Society asserts its right to protest to highlight the plight of threatened forests and or the bad environmental behaviours of industry and government.

10 Working with Industry

The Wilderness Society welcomes any opportunity to work with the logging industry and users of wood commodities to achieve agreed conservation and industry goals. The Wilderness Society strongly supports transitional industry change that helps secure critical conservation objectives and a long-term competitive future for the wood and wood products sector.

When unable to work with industry, The Wilderness Society will promote solutions based on creating industry development opportunities that provide strong social, environmental and economic benefits.

[5] In 2006, Rio Tinto purchased the clearing permits for 13,000 hectares of forest and woodland in Queensland, for carbon credits which were accredited by the Australian Greenhouse Office's Greenhouse Friendly Program.

11 Indigenous Issues

The Wilderness Society has an indigenous policy[14]. This will be applied where appropriate in relation to this policy.

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