Huon Resource Development Group inc.
Submission to the Tasmanian Regional Forest Agreement third five-yearly review, June 2015

Our group applies itself to supporting developments in the Huon Valley that are based on appropriate exploitation and sound management of our natural resources.

**Mission Statement**
Supporting progressive development in the Huon Valley through the democratic representation at all levels of Government ensuring a vibrant and sustainable community

**Summary**
The Tasmanian Regional Forest Agreement did not survive its 15th Anniversary in 2012 as the then Green ALP State and Federal Governments encouraged a process initiated by key industry and environmental interest groups to lead to another agreement that added over 500,000 ha to the formal reserve system, cut the sawmilling and veneer industry in half, decimated both the private forest and pulp sectors and virtually destroyed the special species timber industry. That process achieved its result with little regard to the social and economic consequences to regional areas of Tasmania.

This RFA review is a little like closing the barn door after the horse has bolted, as the greens and their cronies have virtually destroyed an agreement which had remarkable environmental outcomes and had ensured that timber harvesting was carried out in accordance with State and Federal laws and under the principles of ecologically sustainable forest management.

They were able to do so by undermining the RFA with emotional imagery and misinformation, and with market action such as secondary boycotts and defaming companies employing more than 10 workers. The signatories to the RFA were reluctant to provide the general public with an constant information campaign about the benefits of the RFA or to remove the exemptions that green groups enjoyed from competition and defamation laws. The signatories also continued to subsidize the green groups by granting tax deductible and charity status for these activities!

**Introduction:**
The Huon Resource Development Group is committed to encouraging and supporting industries which use Tasmania’s natural advantages to provide for the well-being of its citizens and to increase wealth in a sustainable manner while maintaining the health and diversity of natural ecosystems.

For almost 200 years the Huon Valley has a heritage of industries based upon our natural assets including forestry, farming and fishing. The area is renowned for its produce, fruit, wine, seafood, mushrooms and gourmet delicacies. The Franklin Wooden Boat School demonstrates how Tasmania’s fine timbers are turned into boats, the Geeveston Forest and Heritage Centre promotes the history of forestry in the region.

The Huon Valley has embraced its heritage while forging ahead with newer industries, agriculture, viticulture, forestry; tourism and aquaculture thrive side by side.

The forest industry is based on the natural advantages that Tasmania has in soils of moderate to high fertility for forests, adequate rainfall, outstanding renewable timber resources with rapid growth rates and proximity to ports.
However in recent years the management of our forests, the value adding and downstream processing of timber has become a political issue. The Huon Valley’s local economy was almost destroyed with the overturning of the recommendations of the Helsham inquiry that only 27,400 ha of forest subject to the Inquiry had World Heritage value, instead a political deal by the Hawke/Richardson ALP Government in Canberra to appease the greens resulted in 600,000 ha being added to the World Heritage Area in 1989.

The Regional Forest Agreement that was signed in 1997 reserved a further 293,000 ha of native forest. This agreement, expected to last for 20 years, created certainty which saw a proposal to develop an investment ready site at Southwood in 2001. The Southwood supporter’s group (the forerunner of this group) was formed to promote the sustainable benefits of this development.

After the planning permit was issued in 2002, the group decided to affiliate with the national grassroots organisation, Timber Communities Australia. The Southwood site currently hosts a regrowth sawmill, which sells sawn product into the Australian market, a merchandising yard, and a rotary peeled veneer plant selling product into South East Asia. The site is large enough for further value adding and employment opportunities based on wood available for harvest in the region.

Another exciting step in the development, if it comes about, will be the provision of renewable bio-energy generated from the forest residues after harvesting for sawn timber and pulp wood from local multiple use forests. This will have major benefits in reducing the fire risk in the forests, and reducing the need for fuel reduction burns and resultant smoke.

Having the power station on site will mean costs are minimised for those investors seeking to produce product for the international market place. Plants like laminated veneer lumber planned in the longer term will mean value adding the timber that fails to meet sawlog requirements rather than exporting it as wood chip.

Yet this power station still faces uncertainty because of the lack of bipartisan support for it to be eligible for renewable energy credits. The ALP’s Mark Butler recently stated Labor opposes the inclusion of native wood waste burning as part of a renewable energy scheme and will vote against it. This political stance is completely at odds with the ALP policy to take action to mitigate climate change, and contrary to the findings of the Intergovernmental Panel on Climate Change in its 4th Assessment Report:

“In the long term, a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fibre or energy from the forest, will generate the largest sustained mitigation benefit.”

Projects like Southwood and traditional sawmilling enterprises will have long term benefit to communities within the valley providing our native forests supplemented by plantations are managed under principles of sustainability based upon the scientific evaluation of our forests.

Many newer settlers to the Huon Valley admire the forests for their scenic, landscape and intrinsic values, not realising that the forests result from both wildfire such as those massive fires in 1934 and 1967 and from silvicultural regeneration.

This submission seeks to advance opportunities for value adding, diversification and product innovation; by outlining principles governing science-based native forest harvest and addressing social and environmental perceptions ensuring balance with economic outcomes to provide a sustainable future for this and future generations of the Huon Valley community.

Forest Management provided by the Regional Forest Agreement (RFA) and the Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act

The RFA ensures that almost half the State’s native forests are not subject to timber harvesting. This is 5 times the international bench mark set by the green groups such as WWF and the IUCN.
and by the Convention for Biological Diversity. This outstanding environmental achievement was recently confirmed by the independent review of the EPBC Act that found:

“As a consequence of the Tasmanian RFA, 79 per cent of old growth forest and 97 per cent of high quality wilderness is in reservation. This exceeds the global target of effective conservation of 10 per cent each of the world’s ecological regions, set out under the Convention for Biological Diversity.”

The reviewer noted that “These achievements, which often go overlooked or unremarked in debate, deserve greater public recognition.”

Flaws in Green Demands to overturn the RFA

For the 2004 Federal election the Australian Conservation Foundation and the Wilderness Society identified 670,000 ha of forests to be added to the formal reserves system. Of this forest 240,000 ha of forests was considered highly productive for timber products. 265,000 ha of less production potential on public land and 165,000 ha on private land. In a compromise, known as the Tasmanian Community Forest Agreement the Federal Government agreed to reserve about 140,000 ha of the public forest, making a total of over 1.4 million hectares of public forest reserved.

The same green groups have now found 600,000 ha of forest outside the formal reserves; apparently only 120,000 ha are in ‘informal reserves’. Despite assessments carried out under the Regional Forest Agreement process and the World Heritage commission and their management under the RFA and EPBC Act, the green groups have labelled these forests of high conservation value and demanded its lock up so the new total to be reserved is 1.9 million ha of the 2.2 million publicly owned native forests.

The ENGOs have failed to identify forests already reserved that could be exchanged for these new demands.

High conservation value is a term adopted by the International Forest Stewardship council that defines it as:

High Conservation Value Forests are those that possess one or more of the following attributes:

a) forest areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance

b) forest areas that are in or contain rare, threatened or endangered ecosystems

c) forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control)

d) forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health) and/or critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).

Calls for their reservation are also at odds with continued forest management including production outlined by Principle 9 the FSC.

Under the new agreement the forest industry will be allowed to harvest some of the balance 300,000 ha, mostly regrowth from past harvesting since 1960, for a short period of time, until the young plantations planted since Helsham and RFA can produce sawlogs for any remaining sawmills!

The irony is, that plantations produce a very different product and environment than Tasmania’s magnificent native forests, our saw mills will need to convert from a specialty product to that of a commodity one competing with plantations in the tropics and developing world. Even the rotary
Veneer peeler plant at Southwood will not be able to use the less dense and more flexible plantation wood unless it is intensively managed. In short, a transition from native forests, an abandonment of the Regional Forest Agreement will destroy the Huon Valley forest sector. Tasmania will also be at a disadvantage in marketing the plantation’s wood, as the Forest Stewardship Council prohibits the certification of “Plantations established in areas converted from natural forests after November 1994”.

High conservation value forests

1. The high conservation value forests in Tasmania have already been defined and mapped and identified by foresters and forest scientists. They are those forests containing rare or endangered species of animals or plants or unusual associations of plants, or vegetation that was once widespread but is now of limited extent.

2. Most high conservation value forests are already set aside and managed as national parks and forest reserves.

3. Those high conservation value forests not already set aside are mostly found in the drier eastern part of Tasmania or in areas now dominated by agricultural production. Many are on private land.

4. Much of the HCV forest is within the Tasmanian Wilderness World Heritage area, where an independent Mission investigating if the area’s boundaries should be expanded due to threats to HCV forests, found in 2008: “Considering the representation of old growth forest, including of the tall Eucalyptus forest within the area covered by the TWWHA and its management plan, as well as in the other reserves in Tasmania, and the fact that potential threats from production forestry activities are well managed, the mission does not recommend any change to the boundaries of the property to deal with such threats”.

The sustainable forest cycle

1. The highest value sawn timbers are found in Tasmania’s wet eucalypt forests which support the taller trees such as Eucalyptus regnans and Eucalyptus obliqua. These forests cannot be selectively harvested – they only regenerate in areas cleared of competition, where topsoil has been burnt. Evidence shows that wet forests can be grown sustainably (probably forever) by clearfell, burn and sow methods, in harvest cycles of about 80 years.

2. Most medium to high altitude moist forests are dominated by Eucalyptus delegatensis. These forests can be selectively harvested and the better trees have timber quality similar to that obtained from Eucalyptus regnans and Eucalyptus obliqua forests at low altitude. Ground disturbance during harvest, or a light burn, is sufficient to induce regeneration. Partial (selective) harvest can be repeated at intervals of about 30-40 years.

3. Dry forests (mostly in the east) generally contain lower value timber trees and have lower timber yields. Dry forests can be selectively harvested but growth rates are slow and the partial harvest cycle is about 40-60 years.

4. Commercial native forests managed on long cycles have more intact ecosystems and greater biodiversity than commercial plantations.

Ecological determinants of wood quality

1. Recent technical innovations mean that second-grade native timber, with lower quality than that required for sawn products, can be rotary peeled for the manufacture of veneer products such as plywood and flooring.
2. Special species timbers (e.g. myrtle and sassafras) are used by specialist furniture makers and craftspeople. Trees providing these timbers are difficult to be harvested economically in isolation as they typically form a small percentage of the total timber harvest in clearfelled wet eucalypt forests, which require a burn before regeneration will occur.

3. Further technical research and investment is likely to lead to a higher percentage of wood from native forests being used for high value products.

Sustainable forest practices

1. All native forest harvest in Tasmania is governed by the Forest Practices Act and requires a Forest Practices Plan. Each plan must take into account special values relating to biodiversity, soil and water, geosciences, landscape and cultural heritage.

2. Forest Practices Plans are prepared by professional foresters, who, in addition to their training in forest management, have undertaken courses in forest practices and are accredited by the Forest Practices Authority. Many Forest Practices Plans require specialist advice from the FPA.

3. Most areas planned for harvest ('coupes') are about 50 ha or less in size, and typically about 20% of the area of each coupe is set aside in unharvested reserves for special values, for example, to protect streams and riparian areas, to protect rare species, to provide habitat for fauna living in tree hollows, or to protect archaeological sites.

4. Foresters inspect coupes during and after harvest to check that all provisions in Forest Practices Plans have been adhered to, including provisions for adequate regeneration.

5. In any one year about 15% of coupes are inspected in detail by the Forest Practices Authority to ensure that the Forest Practices Plans for these coupes have been fully complied with. Results of these compliance checks are published annually.

6. The high standards of planning, or on-the-ground environmental checks, and public reporting provided by the Tasmanian Forest Practices system exceed the requirements of international forest certification schemes being considered for Tasmania.

Native Forest Harvest and the Community

- Native forest harvest provides several thousand jobs for forest planners, harvesting contractors, truck drivers, sawmillers, wood processors and trained firefighters in Tasmania. Jobs are concentrated in small and large regional centres such as Huonville, and Geeveston.

- The forest road network including the associated infrastructure (bridges and culverts) not only provides for forest harvest but allows access for services important to the community, e.g. access for firefighting, tourists and beekeepers. This access is largely financed out of income gained from sales of forest products.

- Many foresters are professionally trained in firefighting in forests. In the fire season firefighters are on call to control forest fires and, if necessary, to protect houses and lives. Forestry companies also man fire towers and patrol forests during the fire season.

- The cost of firefighting, of fire patrols and of maintaining equipment such as fleets of fire trucks is largely financed out of income by Forestry Tasmania and the other commercial companies.

- If firefighting costs were not supported out of income from the sale of wood products, the cost of maintaining the road network, bridges and fire towers, and of providing fire patrols, fire trucks and trained personnel would fall entirely to the state. In practice it would probably be financed from greatly increased fire insurance levies or taxation. Alternatively, firefighting
capability would be allowed to run down, to save costs.

- Maintaining access to forests is essential if potentially catastrophic fires, capable of devastating small communities and semi-rural suburban areas around major towns and cities, are to be avoided. Without this access, community safety would be severely compromised.

**Fire and forests**

1. Tasmania's landscape, including its forests, has always been modified by fires.
2. After the arrival of the first settlers in Tasmania about 40,000 years ago fire frequency increased, as it did in all places around the world when humans first arrived.
3. Tasmania's eucalypt forests are a product of fire and ecosystem disturbance. Forest growth begins with seed germinating after fire and in their natural state forests are 'destroyed' by fire, allowing a new cycle of growth to begin.
4. Fire is a natural part of the eucalypt ecosystem and fires are inevitable - one cannot 'save' a eucalypt forest.
5. In rare cases of the interval between fires being longer than the lifespan of eucalypt (about 400 years) the eucalypt forest is not preserved or 'saved' - it gives way to rainforest.

**Conclusion**

The Huon Resource Development Group believes that the RFA should support:

- Ongoing supply to Tasmanian sawmills of logs from native forest, together with the ability to sell residues from these sawlog operations and sawmilling activities. This means that there is no transition from native forest for the processing of Sawlogs and special species timber
- Ongoing supply to Tasmanian rotary veneer mills and future processing plants outlined in the Tasmanian forest industry growth strategy including the approved pulp mill
- Adopt a definition of High Conservation Value forest consistent with the JANIS criteria developed for the RFA or the International _High Conservation Value Forests: The concept in theory and practice_ brochure published by the WWF International in 2007.
- Ongoing support for the capacity to access Special Timbers species for harvest from Regional Reserves and Conservation Areas, wherever they are located, in accordance with the provisions of the Nature Conservation Act, 2002, and the National Parks and Reserves Management Act, 2002, and from the areas indicated in the original STMU’s as mapped in the RFA (1997), in accordance with the provisions of the Special Timbers Strategy, 2010, and to seek to alter the status of higher level reserves where legislation might preclude this.
- Upgrading of trigger mechanisms that recognise threats to the integrity and intent of the RFA and require the reporting of such threats in a meaningful way.

Yours sincerely

George Harris
President