

To: Hon, Matthew Groom MP, Minister for State Growth and Minister for the Environment

Re: Representation on draft Tasmanian Special Species Management Plan

Dear Minister,

I address this representation to the government through you as Minister for both State Growth and the Environment, as I believe the draft Special Species Management Plan ('the Plan'), which facilitates the logging of old growth rainforests in listed conservation reserves, presents a grave risk to the interests of Tasmania and its environment, brand and numerous industries.

I urge you to abandon the proposal to log within any category of reserve and, instead, move to properly protect these areas by upgrading their tenure to one that does not allow logging.

Species to which the Plan applies:

While the rainforest species identified in the Plan are indeed used for craft and other timbers, over recent decades, Tasmania has witnessed tens of thousands of tonnes of these timbers wasted. Supplied as a by-product of clear-felling vast areas of forest, the special species timber market was glutted with near unlimited quantities of subsidised wood, with surplus harvest volumes destroyed in post-logging burns.

I do not believe that Tasmania's old growth and rainforest reserves, and the values they hold, should pay the price for decades of forest and resource mismanagement and the complicity of the special species sector.

Land to which the Plan applies:

I do not support any form of logging within the Tasmanian Reserve Estate. Your own department lists Conservation Areas, Regional Reserves, Future Potential Production Forest (FPPF) and Informal Reserves on Permanent Timber Production Zone (PTPZ) Land as part of the Tasmanian Reserve Estate.

The Plan fails to consider new, uncontroversial methods of special species supply, such as Hydrowood. Supply projections from alternative, conflict-free sources should be built into modelling.

Management of values:

I do not believe that the logging of rainforest trees that are many centuries old, located in listed conservation reserves, is consistent with protecting natural or cultural heritage values.

Harvest techniques:

The Plan identifies that most rainforest species take at least 300 years to grow into a 'commercial log' (pg. 30). I do not believe that logging trees of this age can be considered 'sustainable'.

I am alarmed and appalled by the 'log product recovery factor of 0.4', applied to resource assessment to account for unidentified, internal defects. This means that six out of every 10 trees cut down will be unusable or of very low value due to internal rot or other defects.

Cost of production:

The Plan makes no assessment of the true cost of production of specialty timbers and its relationship to demand. As historical supply was heavily subsidised by clearfelling for eucalypt timber, 'partial harvest' techniques will be significantly more expensive. Cost affects demand and thus projected supply requirements.

The market demand analysis discusses an 'inferred' log value: a sawmill's 'capacity to pay' for a log. Contrary to most pricing structures that establish a price based on the cost of production including log delivery and profit, this works backwards from 'end product prices' and arrives at an inferred log price by subtracting costs and profit margins along the processing chain.

This means log prices are unlikely to cover cost of production in many circumstances.

The government should rule out subsidising, in any way, the logging of rainforests for supply of special species timber.

Demand analysis:

The Tasmanian 'brand' is identified as the most important driver for specialty timber demand. However, there is no discussion of the negative impact, on both the Tasmanian brand and the specialty timber brand, of supplying timber from areas listed as part of the Tasmanian Reserve Estate-protected because of their environmental and other values.

Most, if not all, consumers of these timbers would expect a 'reserve' in Tasmania to preclude logging so as to protect environmental and other values.

A significant 'constraint on demand' is identified as 'the controversial media image of the forestry industry in Tasmania'. However, the Plan contains no consideration of the negative impact of exacerbating this controversy by logging reserves, or the consequential impact on demand. Supplying the market with timber sourced from old growth rainforests within listed conservation reserves is a strategy guaranteed to generate significant conflict and market uncertainty.

This would appear negligent and presents a real risk to the specialty timber sector, the timber industry more broadly, and the Tasmanian brand.

Conclusion:

I do not support the notion of any form of logging within the Tasmanian Reserve Estate and I believe the Plan is ill-conceived and incomplete. Solutions to the challenges facing industry in Tasmania should be resolved through multi-stakeholder dialogue, informed by comprehensive data and analysis. Product pricing should reflect the cost of production.

The Plan presents a serious risk to Tasmania and its brand and I urge the government to properly protect the entire Tasmanian Reserve Estate from logging in dedicated formal reserves.

Yours sincerely,

Name 

Address  email 