



**TWFF comment on the Tasmanian Community Forest Agreement. (TCFA)  
Supplementary Tasmanian Regional Forest Agreement , June, 2005**

**Old Growth Silviculture on Public Land.**

**1. The TCFA has delayed the target time of 2010 for the complete cessation of clear felling in old growth forests.**

While reduction in clear felling is commendable, Tasmanians are worse off in this regard under the TCFA than they were before it. There is a conflict between the previous commitment of the Tasmanian Government and Forestry Tasmania to totally phase out clearfelling by 2010 and the Tasmanian Community Forest Agreement which agrees to only achieve “non-clearfelling silviculture in a minimum of 80% of the annual harvest area of the coupes old growth forests on State forests by 2010”<sup>1</sup>. The TCFA will presumably over-ride any previous agreements.

**2. The TCFA has not adequately addressed the problem of waste, particularly of special species trees, in old growth mixed wet eucalypt forests.**

The main alternatives to clear felling in old growth forests proposed by Forestry Tasmania are the variable retention methods of aggregated retention and dispersed retention.<sup>2</sup> Both methods perpetuate the waste of useful timber and of potential timber of all species through the continued cutting in one pass, of trees of all species of all ages. The essential difference between the FT preferred aggregated retention method and clearfelling is that the area of the cut will be less in a coupe at the first pass. After a rotation period of 90 years, the aggregates may be either cut in a second pass, or remain for a further 90 years, giving a tree age in any one aggregate of initial age + maximum of 180 years<sup>3</sup>. This is something of a “pot luck” system for immature special species trees like CTP that take 300-500 years to mature.

The variable retention methods do not resolve the problems of erosion caused by logging or myrtle wilt in mixed wet forests.

It is therefore imperative that a high priority be given to fast tracking research in Warra 17b and some of the money earmarked for “introducing new silviculture for old growth harvesting”<sup>4</sup> and “measures to support reductions in clearfelling”<sup>5</sup> be set aside for that purpose.

<sup>1</sup> TCFA, 13<sup>th</sup> May, 2005, Clause 30

<sup>2</sup> Hickey, J. et al, *Alternatives to Clearfell Silviculture in Old Growth Forests*, Paper 1, Towards a New Silviculture in Tasmania’s Public Old Growth Forests, Draft, Forestry Tasmania, April 2004, p.15

<sup>3</sup> Ibid

<sup>4</sup> TCFA, Table 3, p.22

<sup>5</sup> TCFA, Table 4, p.23

### **3. TCFA's public reporting requirements of old growth forest harvested are not sufficiently precise to allow public scrutiny of logging methods in each district.**

The TCFA requires that the State will “publicly report the area of public Old Growth forest harvested by silvicultural technique each year”<sup>6</sup>. In order for the public to make sense of such reports, the current (2005) area of old growth forests in the timber production areas, expressed in hectares, *by district*, must be made public now, as well as the estimated area (in hectares *by district*) that will therefore be left in 2010. Clause 31 does not make clear whether “area” will be reported in terms of percentage cleared by silvicultural technique, or actual hectareage cleared.

In short, without additional knowledge, there is no way the public can work out whether clearfelling will be reduced to 20% by 2010 because there is only 20% of the current old growth left by then, or because the reduction in clearfelling is designed to leave some old growth in the timber production areas to be selectively logged in perpetuity by 2010.

If hectares of public forest clear felled are not reported *by district*, then it is possible for clearfelling to remain the dominant form of logging in any particular district and the figures could still indicate an overall decline in clearfelling as a silvicultural method in the State. For example, the whole of the Southern Forests in the timber production areas could be clearfelled without public scrutiny.

### **4. Tasmanian wildlife is not protected from 1080 poisoning under the TCFA because the Agreement has not achieved a total ban on 1080 poison use.**

### **5. The TCFA has diluted previous Forestry Tasmania commitments in relation to logging methods in STMUs.**

Prior to the TCFA, “clearfelling and burning” were “specifically excluded from STMUs”<sup>7</sup>.

In 1995, Forestry Tasmania clearly indicated that STMUs were designated for “long rotation selective harvesting”<sup>8</sup>. By 2002, this promise had sashayed into “light selective logging”<sup>9</sup>, a term for which no definition has been given. In 2004, STMUs were “to be managed through partial harvest or selective systems”<sup>10</sup>.

The TCFA now only commits to “management of *selected areas* of STMUs on State forest, **for selective harvest** of special species timber.”<sup>11</sup>

Special species users need assurances that this does not leave the way open for clearfelling, in any of its forms, in STMUs.

### **6. The sustainable production of leatherwood honey has not been secured.**

The TCFA agrees to “provide beekeepers with rotating access to apiary sites to maintain sustainable supplies of leatherwood honey”<sup>12</sup>. This provision only delays

<sup>6</sup> TCFA, Clause 31

<sup>7</sup> Towards a New Silviculture in Tasmania's Public Old Growth Forests, Draft, Forestry Tasmania, April 2004, Glossary, p.3

<sup>8</sup> Management and Sale of Special Species Timbers, Forestry Tasmania, June 1995

<sup>9</sup> Tasmania's special species timbers, Forestry Matters, Forestry Tasmania, August 2002

<sup>10</sup> Towards a New Silviculture in Tasmania's Public Old Growth Forests, Draft, Forestry Tasmania, April 2004, Glossary, p.3

<sup>11</sup> TCFA, Clause 44

<sup>12</sup> *Ibid*

the inevitable demise of the leatherwood industry which would be better sustained, not by new roads, but by an immediate halt to clearfelling in areas rich in leatherwood.

**7. Significant amounts of taxpayers' money is allocated to Forest Industry Development and Revitalisation, essentially to assist the hardwood industry to harvest and process a lower grade product, while waste of good sawlogs and potential sawlogs continues.**

Expense attendant on Clause 52 of the TCFA could be reduced by preventing FT from ever re-classifying sawlogs as pulp logs, a practice FT has admitted to in the past. Similarly, the TCFA does not prohibit the export of whole logs, Tasmania's equivalent of Japanese whaling for "research purposes".

**8. The TCFA does not address all the concerns of users of special species timbers.**

While funding to help sawmillers re-tool to produce low grade eucalypt products assists sawmillers deprived of special species resource because of past poor forest management, changes in resource mix, use of regrowth and plantation timber as well as reservation of forest, it does not help their customers who still require the special species resource for craft, furniture making and boatbuilding. Only cessation of clear felling in old growth forests and increased areas set aside as STMUs for selective logging will do this.

The difficulty for users of special species is that they are assured that there are sufficient STMU resources to serve their needs in perpetuity but never provided with proof of the assertion. The TCFA has not provided security to special species users who currently do not know the area of STMU forest declared in the State by district, the content, in terms of timber quantity, species and quality, in STMUs by district, the state of accessibility of declared STMUs and the ease or difficulty of selectively logging declared STMUs.

Assistance for "the development of improved marketing, recovery and value-adding initiatives for special species timbers"<sup>13</sup> is welcomed. The best way of ensuring greater recovery of special species timber is by never cutting down immature special species trees.

The need for reliable research on how to make selective logging as safe as possible is an urgent pre-requisite for the use of selective logging in STMUs, which, we believe, contain mixed wet eucalypt forests as well as rainforest.

**9. Wood fired power stations legitimise continued waste of forest resources and will create a continuing demand for fodder.<sup>14</sup>**

The SFRA advocates the use of harvest residue, created by non-clearfell silvicultural techniques in wet eucalypt forest, in wood fired power stations, using the same arguments that initiated our now voracious woodchip industry e.g.

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<sup>13</sup> TCFA, Cl 56

<sup>14</sup> TCFA, Cl. 57

“biomass energy plants will improve the efficiency of overall resource use and assist regeneration under non-clearfell silvicultural techniques”.

A simpler, morally justifiable and sensible solution is not to use silvicultural techniques that create large quantities of waste. It is difficult to foresee such power stations becoming anything other than the tails that wag the dogs of the future, leading to further destruction of forests, the need to produce ever greater quantities of “residue” and ultimately, purpose-planted plantations in order to feed the power stations and recover the substantial capital expenses required to build them

**10. The Commonwealth has now agreed to major project status for Gunns Pulp Mill proposal before any information is available on the social, economic or environmental effects of a pulpmill at Bell Bay are known.**

**11. The TCFA fails to give priority to expenditure of funding for research to immediately eliminate or implicate 1080 as a factor in Tasmanian Devil facial tumours.**

**12. Only \$2million has been allocated to tourism and recreation projects when these relatively harmless industries employ 23,700 people directly<sup>15</sup> (cf Forestry: 7,700 direct jobs<sup>16</sup>) for approximately the same financial return**

**13. Under the TCFA, the Tasmanian and Australian people are paying money for State and Federal governments to claim credit for the work of others e.g. the conservation movement, timber workers and the public.**

\$2.2 million has been allocated for “Communication” under the TCFA. This money is to be spent on

- increasing awareness about how forests and the plants and animals within the forests are protected through our reserve systems and through careful forestry practices
- highlighting the significant initiatives contained in the TCFA
- improving community awareness and understanding of sustainable forest management
- increasing public appreciation that Australia’s track record on managing our forests and in preserving our important forest values is among the best in the world.<sup>17</sup>

The Australian people might well wonder why they are paying out more money to congratulate the Commonwealth and State governments, who have been dragged kicking and screaming into an agreement that would not have been necessary but for the failure of the Tasmanian RFA of 1997 to properly reserve significant forest areas in Tasmania.

In the 7 years since the signing of the RFA, so much timber has been wasted by clearfelling and woodchipping that now we not only have to spend millions of dollars retooling and supporting hardwood and special species mills, but we also have to spend \$2.2 million justifying the waste of time, timber and energy.

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<sup>15</sup> Tourism 21, Tourism Tasmania, 2005

<sup>16</sup> ABS, November 2004

<sup>17</sup> A Way Forward for Tasmania’s Forests, Tasmanian Community Forest Agreement, Fact Sheet 16.

The TCFA is an agreement necessitated by bad practice and does not compensate the lower echelons of the Tasmanian hardwood industry, such as sub-contractors who continue to suffer real hardship, whilst rewarding the upper echelons for past wasteful practices and profligate use of Tasmania's timber resource.

A significant proportion of the \$2.2 million allocated for "communication" would be better spent on supporting small Tasmanian contractors bedevilled by debt, while a simple public apology from the Tasmanian government to the people of Australia for its mismanagement of Tasmanian forests and its failure to reserve significant forests, placed in local and major national papers at a relatively modest cost of \$150,000 would suffice for public communication purposes.