

Submission to Legislative Council Select Committee on the Tasmanian Forests Agreement Bill 2012

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Author's background

I am a forester with a degree in Environmental Science (UNE) and Diploma of Natural Resource Management (EGIT). I gained ten years' experience in various aspects of forested land management in East Gippsland, ranging from on-ground firefighting and coupe supervision roles through to sales/marketing, strategic planning and community engagement as part of the region's management team. Moving to Tasmania in 2005 to pursue recreational opportunities in the state's deep and wild cave systems, I began working with Forestry Tasmania's Huon District as Planning Coordinator. After several years in this role I shifted to a Strategic Projects position, before my employment finished in late 2010 due to industry contraction. I am a Forest Practices Officer (Planning) and maintain an active role in my community.

Local Huon Valley TFA impacts

1. Early harvest of younger regrowth

I'm becoming increasingly disappointed with the effectiveness of our state's forest management policies as I see more and more harvesting in forest regenerated after the 1967 fires. When I first arrived here in 2005, this was done occasionally – either on poorly performing sites that were being cleared and converted to plantation as a resource substitute for Old Growth forest reserved under the TCFA, or on highly-performing and well-stocked sites where trees were thinned to concentrate growth on sawlog stems for a shorter (eg. 60-year) rotation. However clearfell and regeneration of 1967-1980 origin stands is now occurring on a much broader scale, and not for their yield of sawlog (minimal) but for a peeler crop forming 30-40% of the majority pulpwood yield (my estimate).

This peeler crop isn't the by-product of sawlog production, as was originally intended for supply to the Ta Ann development. This peeler crop IS our future sawlogs: grow these stands on another 20 years and their yield would be 20-30% sawlog PLUS 30-40% peeler (my estimate). By harvesting these stands now, we are actually losing our future sawlog crop, the sawlogs that would sustain a sawmill industry in the Huon Valley in 20-40 years time.

I haven't analysed the scale of this harvest, but I recommend that this Committee ask Forestry Tasmania to do so and provide them with their results. I know there are significant areas of this 'aged regen' in the Blue Hills and Tyers Hill areas, with more in places like the Denison and Hopetoun blocks. Southwood Road runs straight through it, and driving through you can see where conversion has targeted this resource and where it's now being clearfelled.

I would estimate that at least a third of this '60s and '70s future sawlog resource has already been harvested. I'm not saying that none should have been; but where some commencement of strategic coupe dispersal in these even-aged forest areas should have been the goal, it has been neither goal nor outcome. Given that some of this resource pool will also prove unavailable due to other constraints (Forest Practices Code, threatened species, economics etc), by the time this SOP-IGA-TFA saga is resolved we are likely to have lost half our future sawlog resource from this regenerated forest source. Unfortunately, I see the pressure of reduced production forest from the TFA 2012 as also clearfelling the remainder of that regenerated forest before its sawlog crop is mature and ready for harvest at its optimum yield. This wastes not only the establishment effort, earlier silvicultural work such as thinning, but also the site potential of our fast-growing and potentially sustainable Huon native forests.

I seek to give further information *in camera* to the Committee on this topic.

The implementation of new policies BEFORE their potential effects are evaluated almost always results in unintended consequences. I see that this has been the case as a result of the SOP-IGA-TFA process, and recommend that the detrimental effects on our future sawlog supply should be halted immediately by suspension of 'phase-in' steps until thorough evaluation and decision-making is complete.

There are a number of opportunities which I have not detailed here, that could provide solutions to the issues identified above.

2. Lack of dispersal/concentration of harvest operations

With ENGO-claimed reserves covering much of Huon district, the remaining area of operation is restricted. Over the past couple of years since implementation of the moratorium, coupe dispersal has suffered and harvesting is being concentrated closer together in more specific areas such as Arve block.

As well as causing a poorer ecological outcome from a landscape-scale perspective, this lack of dispersal significantly increases fire risk – either from wildfire or the increased difficulty of regeneration burns. With ENGOs generally focussing on areas adjacent to the WHA, this concentration of harvesting and difficult-to-manage unburnt fuels is also closer to habitable areas and assets such as farms and plantations. The risks of this strategy have not been managed, especially with the reduced firefighting assets now available to Forestry Tasmania.

As in the above section, I recommend that 'phase-in' steps (eg. moratorium) be suspended until evaluation and decision-making is complete and preparations are made for a planned commencement to any new policies.

3. Anti-competitive resource allocation/licensing

The signatories' negotiation process has focussed on outcomes that favour existing resource users that are part of those signatory organisations. Processors and innovative potential processors who are not currently licensed or have not chosen to align with a signatory group, have been disadvantaged in their ability to evaluate and negotiate access to forest resources that others currently have claim to.

This has disadvantaged a number of smaller local sawmills. It also reduces the opportunity for innovation and development in the ways we might use and process our forest resources in the future.

There are a number of alternative methods of marketing and allocating/licensing forest products, but these appear not to have been considered through this process. They need to be integrated as part of a solution to more effective and efficient use of our forest resource.

4. Poor conservation/ecological outcomes

The ENGO-claimed reserves impact heavily on Huon's State Forest, covering most of the forest currently rich in sawlogs – and omitting forest that doesn't hold much economic value in the near future. This ENGO claim – which is NOT defined as HCV in any transparent or accountable sense – appears to be devised as much as an economic anti-forestry strategy as compared to having any ecological or environmental benefit.

There are various HCV documents that provide background and guidance to the concept (eg. FSC Australia's *High Conservation Values Evaluation Framework – Draft 2.1*, WWF's *High Conservation Value Forests: The concept and theory in practice*). A key point I glean from them is that HCV doesn't necessarily preclude harvesting, a point in direct contrast with the ENGO's position.

Tasmania has a system to manage High Conservation Values – and Medium, Low and Negligible Conservation Values too. It is the Forest Practices System, and it also manages values of social or cultural heritage importance as well as the 'natural' ones.

One positive of this TFA proposal is the idea that the FPA also be required to balance economic and social considerations with its management of natural values; the 'triple bottom line' approach. I support a more comprehensive regulatory role for the FPA, for example there is potential for them to manage the sustainable yield of State Forests. Sustainable yield implementation could be regulated through the Three Year Plan lodgement process or Forest Practices Plan approvals, and would become a more robust tool if Forest Practices Code prescriptions under development were evaluated and integrated into the calculations and model in a more pre-planned manner.

I am appalled that in the Huon, the ENGOs' focus has been on increasing reservation in areas of forest already containing high levels of reserve or low levels of threat (eg. zoning as 'Special Timbers' or non-clearfell harvest), while other parts of our State Forest are apparently given up on. The Franklin forest block, located between Geeveston and Huonville, has this district's lowest level of reservation and highest level of plantation (on converted former native forest) and contains many threatened species records (Wedge-tailed Eagle, Swift Parrot, *Thismia rodwayii* etc) as well as Old

Growth forest, cultural heritage and landscape values. It is the least ‘protected’ and most intensively managed of the Huon’s forest blocks, and in my opinion deserves very careful management including a greater area of reservation – but the offset of harvesting impacts from the ENGO-claimed reserves will more likely intensify the harvesting impact on this area. This is a perverse result.

5. Consultation, involvement and community engagement

I am incredibly disappointed at the lack of consultation, involvement and community engagement that has occurred during the development of this Bill, and which is set to continue under the current wording of the Bill. I am experienced in forest consultation and community engagement at both the operational (eg. coupe plan) and strategic (eg. Portland-Horsham Forest Management Plan) levels, and have seen these techniques achieve good results for all stakeholders. In contrast, the current process has disengaged many and resulted in a few ‘winners’ and many ‘losers’.

Consultation, involvement and community engagement will enable – or prevent – the following:

Best available information/innovation to base solutions on	vs	Limited information/traditional coping mechanisms
Durable, efficient and well-resourced outcomes	vs	Fragile, wasteful and poorly-resourced non-outcomes
Legally robust processes with good governance	vs	A potentially unlawful agreement with future legal ramifications for government and participants
Strong and robust fundamentals behind practices that can adapt well to changing circumstances	vs	A lack of fundamentals and ad-hoc practices that bog down or fail in changing circumstances

I am personally concerned at the internal processes (or lack of) that have characterised TCA’s role in the development and signing of the *TFA 2012*. This group has claimed to represent the community, yet whenever I have attempted to bring community feedback to the attention of its leaders I have been told they are irrelevant, as TCA “is only representing its members”. And given its board’s decision to sign the TFA, apparently this representation is restricted only to the small proportion of members who support the TFA.

I seek to give further information *in camera* to the Committee on this topic.

I would also ask the Committee to investigate the capacity of each of the signatory organisations to represent the sectors they claim to. Information should be publicly available on just who is a member and decision-maker in each of these organisations, how many people they represent (compared to how many people there are in each sector ie. how many non-members are unrepresented), and how their decision-making process functioned. This information ought to give the Committee a better perspective on how unanimous or supportive these stakeholders are for the TFA 2012.

I do not believe that the TFA can have any broad durability unless it includes a number of other significant stakeholders including the Institute of Foresters Australia, the Tasmanian Farmers and Graziers Association, Markets For Change and indeed other unaffiliated people. If these important

stakeholders cannot agree and work within that TFA process as outlined in the legislation, then this demonstrates that this isn't in fact an 'agreement' or a legitimately founded process.

Conclusion

While I see some opportunities to make minor improvements to the TFA Bill, I believe it is so fundamentally flawed that it will ultimately fail and damage the very values it seeks to enhance. The only way forward I see is to commence a proper process of strategic forest planning – widely consulted and informed – perhaps as preparation to review and renew the state's Regional Forest Agreement in several years time.

I would welcome the opportunity to speak before the Committee.