Reserved myrtle rainforests in the takayna/Tarkine, proposed for logging under the draft Plan.
Image – Rob Blakers

Submission on the draft Tasmanian Special Species Management Plan – August 2017

Snig track in a 'partial harvest' (group selection) trial coupe, EP048C, Esperance, Southern Tasmania. July 2013
Image – Vica Bayley

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24 August 2017

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Re: Submission on draft Tasmanian Special Species Management Plan

Dear Minister

As Minister for the Environment, you are responsible for the management of the Tasmanian Reserve Estate and the protection of natural and cultural heritage values. The draft Special Species Management Plan (the Plan) foreshadows logging oldgrowth rainforest species from listed conservation reserves and as such relates directly to your portfolio.

The Plan misleads the public as to the use of 'partial harvest' logging techniques in Tasmanian rainforests, describing them as common, when the reality is they are unproven and have not been used for many years, perhaps decades.

The Plan presents a serious risk to the integrity of Tasmania's reserve system and the protection of the values it holds.

This in turn undermines the credibility of Tasmania's brand and its marketing as an iconic, world-class eco-destination.

Logging oldgrowth, rainforest trees from listed conservation reserves has no genuine role in modern Tasmania. The approval of the Plan and operationalisation of the logging it foreshadows would represent an abrogation of your responsibility to protect Tasmania's environment, manage the reserve estate and maintain the state's growth, much of which is underpinned by the credibility of Tasmania's reserve estate.

I urge you to abandon the plan to log rainforest reserves and instead, move to properly protect these areas in formal reserves that explicitly protect values by excluding threatening activities like logging.

Yours sincerely,

Vica Bayley,
Tasmanian Campaign Manager,
The Wilderness Society

Context:

The Wilderness Society has campaigned for the protection of wild places in Tasmania for decades. Since the 1980's, this work has predominantly focused on protecting forests on public land, resulting in the creation of many of the national parks and reserves that now underpin Tasmania's identity, economy and community wellbeing. It was welcome to hear the Tasmanian Government acknowledge these benefits in 2016, as we celebrated the 100th anniversary of the declaration of its first national parks.

Over the course of our campaigns, we have witnessed the wanton destruction of vast areas of forests of significant conservation value and the resulting impact on species, water catchments, climate change and the psyche of everyday Tasmanians.

Parallel with this we have seen the destruction of vast quantities of rainforest timbers. Historical supply of rainforest timbers for the special species market has been via 'integrated' forest operations, in other words, special species timbers were supplied as a by-product of clearfell and burn logging in tall wet eucalypt forests.

This fact distorted the market with high volumes of high quality, subsidised wood.

As the special species market was regularly glutted via this supply structure, surplus volumes were left on the coupe floor to be burnt in regeneration burns. Both anecdotal and audit reports[i] confirm that many hundreds of thousands of tonnes of usable timber, generations' worth of supply, were destroyed due to market dynamics, economics and the support of many in the timber industry, including the special species sector.

Over the last eight years, the structure of the Tasmanian timber industry has changed irrevocably. The woodchip market that drove the scale of 'integrated' logging operations has collapsed, the biggest eucalypt processor of both sawlogs and woodchips, Gunns Ltd, no longer exists and, quite appropriately, the publicly-owned land-base available for logging has reduced to exclude forests of the highest conservation value.

Given this, the expectation underpinning the Plan that rainforests within Tasmania's Reserve Estate should be sacrificed to maintain historical levels of supply is offensive to many, naïve and deeply disturbing.

The Wilderness Society views the Plan as a political document written to generate conflict and division within the Tasmanian community in the lead up to a state election. It is not a genuine, good faith attempt to reconcile the needs of the special species sector with the changed structural circumstances of the timber industry, the waste of previous decades and the realities of market dynamics, economics, conflict and consumer sentiment.

In this context, the Plan also squanders the goodwill of previous attempts to plan a viable future for the sector and should be abandoned.

Images 1 and 2: Before and after a regeneration burn in the Styx Valley, coupe SX 15A – 2004. A vast amount of celery top pine was destroyed. An enquiry of a Forestry Tasmania representative at the time elicited the response 'we would have liked to have been able to sell it'. Images - Vica Bayley

Land to which the Plan applies:

Logging of any type should not occur within the Tasmanian Reserve Estate and the Wilderness Society is working to both increase the formal reserve network and upgrade the conservation tenure of land within the reserve network.

Tasmanian Government data[ii] confirms Conservation Areas, Regional Reserves, Future Potential Production Forests (FPPF) and Informal Reserves on Permanent Timber Production Zone (PTPZ) land all form part of the Tasmanian Reserve Estate and are recognised as part of the Comprehensive, Adequate and Representative (CAR) reserve network.

The Plan discusses the CAR reserve system as comprising '*just over half of the State's land area*', offering protection for '*a wide range of Tasmania's natural and cultural values, including native forest and …old-growth forest*' (page 16). Whilst this section reads as if the CAR Reserve system is securely protected from threatening activities (like logging), it does not declare the fact that the Plan itself is centrally about logging 420,000 hectares of those 'protected' old-growth rainforests within the CAR reserve system.

Indeed the status of the CAR Reserve Network / Tasmanian Reserve and its capacity to actually protect natural values is a core principle of sustainable land management, including forestry. Certification schemes such as the Forest Stewardship Council (FSC) look to the conservation reserve network as a measure of natural values' protection in the landscape, with a resulting relationship to required land management actions on a defined land area being assessed for certification.

Forestry Tasmania's (now 'Sustainable Timber Tasmania' -STT) High Conservation Values (HCV) Assessment and Management Plan, prepared in February 2017 for its second FSC certification bid, acknowledged this by stating '*if any significant change was to occur in the management of land outside of the PTPZ land, the relevant elements of this plan will be reviewed and revised as necessary* (pg.8.)[iii]

The Plan's proposal to log informal reserves <u>on</u> PTPZ land, part of the Forest Management Unit being assessed for FSC certification for STT and directly under its management control, itself represents a significant, serious and alarming change.

However, when you combine the Plan, its proposal to log this other reserve tenures and the Hodgman Government's policy to reverse the reserve status 356,000ha of FPPF land, STT's FSC bid is seriously threatened. If implemented in any way, the Plan would set STT's FSC bid back to square one, requiring a review and revision of the HCV Assessment and Management Plan

Any credible plan to consider an economically, environmentally and socially viable future for the special species sector would have to consider new, uncontroversial methods of special species supply such as Hydrowood. All reports are that high volumes of very high quality timber is being salvaged from drowned forests. This both presents a clear, non-controversial supply opportunity and an influence on market dynamics including price, quality and subsequent demand. Consumers would undoubtedly prefer uncontroversial, salvaged timber over that sourced from live trees, generally well over 300 years old, logged from the Tasmanian Reserve Estate. The Plan fails to discuss the extent to which

salvaged timber can meet genuine market demand, and negate the purported justification for providing access to the Tasmanian Reserve Estate.

The Wilderness Society recommends a multi-stakeholder approach to resolving land-use, market and other conflicts and has a demonstrated willingness to engage constructively in these processes. The Tasmanian Forest Agreement identified Specialty Timber and Craft Zones, land identified as being the basis of ongoing study and negotiation (including through a Management Plan development process) to determine 'the final tenure status' of this land. As these Zones are now wholly classified as PTPZ land, a multi-stakeholder process should be established to determine which areas are to be reserved, and which remain available for special timbers supply.

Management of values:

Logging rainforest species that are many centuries old, in conservation reserves designed to protect biodiversity, water, old-growth and other natural values is not consistent with the protection of those values and cannot be considered 'sustainable'.

Image 3 – Reserved rainforest in the Northeast Highlands, subject to logging under the Plan. Image - Rob Blakers

The 'Conservation Assessment' of FPPF land is woefully inadequate, lacks independence and does not take into account past research that has identified much of the FPPF land as having National Heritage significance, or, in the case of takayna/Tarkine, World Heritage significance.

Putting aside the inadequacy of the FPPF 'Conservation Assessment', the Plan does not even seek to assess the values of other reserves proposed for logging, including formal

reserves gazetted under the *Nature Conservation Act 2002*. Instead, the Plan relies on the fact that FPPF is '*dispersed throughout Tasmania*' therefore findings are *'generally applicable to other land tenures*', including formal reserve tenures (pg 25). This is embarrassing and irresponsible.

As stated on the Federal Environment Department website the '*Australian Heritage Council found the Tarkine in north-west Tasmania of outstanding national heritage significance*'[iv] . The rainforest reserves in the takayna/Tarkine region, identified in the Plan for logging, fall within the area found to have outstanding national heritage values. The Tarkine's rainforests are a significant component of this national heritage.

Additionally, a Government auspiced verification process in 2012 identified the Tarkine region as having World Heritage values, specifically noting that the contiguous nature of rainforest cover contributes to its eligibility as World Heritage.[v] Environment groups will continue to work towards having the takayna/ Tarkine added to the Tasmanian Wilderness World Heritage Area.

Image 4 – Aerial view of reserves rainforests in the takayna/Tarkine, recognised as having World Heritage values but proposed for logging under the Plan. Image - Rob Blakers

The Plan relies on the Tasmanian Forest Practices System to protect environmental and cultural heritage values in the reserves identified for logging. This system and its exemption from Federal environmental laws (*Environment Protection and Biodiversity*

Conservation Act) under the Regional Forest Agreement has long failed to adequately protect environmental values.

One demonstration of this is Forestry Tasmania's (STT's) failure to achieve Forest Stewardship Certification for its forest management, despite being consistent with the Forest Practices System and its code. If certification was denied to previous operations, it is impossible to imagine the logging of rainforests from within reserves would achieve any level of credible certification.

Assessment, monitoring and enforcement:

The Plan relies on government agencies (the Parks and Wildlife Service and Department of Primary Industries, Parks, Water and the Environment), with no experience in developing and approving forestry related silvicultural activities or Forest Practices Plans, for the assessments of harvesting applications and Reserve Activity Assessments. The Plan does not discuss or countenance additional resources being required (let alone or delivered) to enable these agencies to perform these roles.

The silvicultural techniques described in the Plan cannot be claimed to be economically, environmentally or socially sustainable, let alone protect reserve values.

Disease management:

Myrtle wilt, a naturally occurring fungal disease exacerbated by disturbance like mechanical harvesting, is identified in the Plan as a serious issue requiring 'additional species specific management' (page 40). Forestry Tasmania's Rainforest Silviculture Bulletin[vi] states '*selective sawlogging is a lower impact system which more closely approximates natural gap regeneration of the rainforest but also increases the incidence of myrtle wilt above the natural background level'* (page 15). It goes on to say that myrtle wilt '*epidemics can kill up to 70% of the mature myrtles*' (page 20).

Given 'selective sawlogging' is theoretically the lowest impact of the three silvicultural methods described in the Plan (and defined as 'partial harvest), yet the '*dead myrtle trees and those dying from wilt reduce (aesthetic and rainforest structural) values and constitute a high fire risk'* (page 16), the negative impact of any logging on values is clear, if not properly quantified and articulated in the Plan.

The Wilderness Society does not accept that 'additional species specific management prescriptions' would be adequate to avoid epidemics of myrtle wilt, with resulting exacerbation of long term impacts on the values of reserved rainforests.

Established Supply:

This section of the Plan does not explain historical supply levels, the effect of timber supply as residual from past eucalypt logging operations or the implications of structural change recently seen within the industry.

It does not seek to establish market-driven, cost sensitive supply/demand profile as a means to determine genuine, credible 'supply' targets.

Instead, established supply is a 'maximum annual harvest quantity' (page 35) calculated via a range of base, unsophisticated formulae that translate hectares of rainforest on various land tenures into a log volume.

In a calculation of Monty Python-esque brilliance, this equation even applies a discount factor of 10% to account for '*the proportion of standing volume contained within areas available for harvesting, but is not expected to be harvested due to its location within coupes, including steep slopes, streamside reserves and areas set aside for protection of conservation and environmental values*' (pg 35).

In other words, in land protected as part of the Tasmanian Reserve Estate, 100% set aside for 'the protection of conservation and environmental values', 10% is deemed likely to be assessed as being unable to be logged because of '*steep slopes, streamside reserves and areas set aside for protection of conservation and environmental values'*.

In a shocking revelation of the waste involved in rainforest logging, the Plan also applies '*a log product recovery factor of 0.4 … for all species'* (pg. 34). This discount factor is applied to '*account for undetected internal defects in logs*' (pg. 31), meaning that six out of every 10 trees felled are expected to be internally defective. Rather than contribute to special species supply targets, these trees, logged from within reserves will be wasted, woodchipped or otherwise put to low value uses.

Forestry Tasmania's May 2017 Resource Assessment[vii] explains this further, quoting a study (Mesibov 2002) that found that '*the ability of forest assessors to predict internal defects reliably from external appearance, showed that experience was of little value and a blind guess was as good as the considered opinion of an experienced assessor in most cases* (page 11).'

The Plan does not discuss the pulpwood market required to support the silvicultural techniques described. Forestry Tasmania's Rainforest Silviculture Bulletin[viii] identifies that over-story retention (and selective sawlogging) '*requires a market for pulpwood*' (page 16), yet the Plan fails to identify a market for this supply.

Identifying, accessing and maintaining a market for woodchips derived from logging old growth rainforests from within listed conservation reserves will be incredibly difficult, given the quality of the product and contentious nature of its supply. Some discussion of this segment of supply is warranted.

Harvest techniques:

As discussed above, the Wilderness Society does not accept that logging conservation reserves is consistent with protecting the environmental values of those reserves and does not support logging of any kind in reserves.

Logging rainforest species from conservation reserves, where individual trees are likely over 300 years old, cannot be considered sustainable, irrespective of silvicultural techniques and proposed rotation lengths.

The Plan seeks to mislead the public, arguing the three 'partial harvest' silvicultural techniques referenced are '*commonly used in Tasmania*' (page 38). Advice from STT is

that these techniques have not been used for many years and a statewide search for relevant, recent Forest Practices Plans yielded no results.

Enquiry of STT for data on past approved Forest Practices Plans (FPPs) for 'partial harvesting' operations (specifically over-storey retention, selective sawlog removal and group selection) revealed that it was '*not be able to identify any contemporary FPPs for the harvest systems you have requested.'* [ix]

The response goes on to explain that this is due to the historic industrial structure of special species supply. '*The primary reason for this is that special species production has been the result of arisings from eucalypt sawlog operations rather than specific harvesting…we have not conducted harvesting operations of these types within the last 5 years, and possibly as long as 10 years or greater,'* the email states.

This undermines any claims that there are 'tread widely, tread lightly' logging operations in use in Tasmania and that 'partial harvest' techniques are environmentally proven. In fact, the email confirms that FPPs for old and/or trial logging operations '*are no longer contemporary due to changes to the Code, internal policies etc that have occurred over this time*.'

Tasmania's Reserve Estate is no place to reality test unproven rainforest logging techniques.

It also confirms the analysis that these logging techniques have not been commercially used or proven. This reinforces skepticism over the economic viability of the logging operations and the likely need for public subsidy, as discussed in Cost of Production section below.

As indicated in the Plan (Page 38), the *Forestry (Rebuilding the Forest Industry) Act 2014* defines 'special species timber harvesting' as *'the harvesting of special species timber by partial harvesting'* (sect 3). In turn, partial harvesting is defined in the same act as *'the harvesting of single trees or groups of trees whilst retaining other trees including advanced growth trees, seed trees and shelterwood trees*' (sect 3).

STT, defined 'partial harvesting' in its 2014 Forest Management Plan[x] as '…*harvesting systems which include the retention of some trees, for example, seed tree, shelterwood, thinning and variable retention*.' (pg 87).

Published variable retention technical notes in Forestry Tasmania's Variable Retention Manual[xi] describe compliant silvicultural techniques that include 'aggregated retention', colloquially known as 'clump clearfelling'. This involves the strip clearing and burning of whole forest sections, with retention of approx.1 ha aggregates, or islands. The manual states that '*no minimum amount of retention is required*' (pg 7).

While the Plan details '*three silvicultural techniques commonly used in Tasmania (and) considered consistent with the definition of partial harvesting'* (page 38) it includes a footnote stating the list of three '*silvicultural techniques is not comprehensive*…' Putting aside the fact that these techniques are not actually 'common', aggregated retention is not ruled out in the Plan and could potentially be required to maximise safety and profitability of logging operations. Indeed, aggregated retention is likely the <u>most</u> 'common' silvicultural technique currently in use in relevant forest types in Tasmania.

Image 5 - Aggregated Retention logging in the upper Styx Valley – 2004. Image - Geoff Law

Irrespective, the three listed silvicultural techniques are unproven, problematic and have significant impact on natural values, discussed previously. By way of example, the one coupe that is contemporary, a 2013 trial of ‘group selection’ demonstrated significant impact to forest structure, soil, aesthetic and other values, see images below. Incidences of myrtle wilt, discussed above, have not been monitored or reported from this trial.

Image 6 - Snig track for extraction of timber from the group selection logging trial in coupe EP48C – 2013. Image - Vica Bayley

Image 7 – Impact on a ‘group’ of celery top pine, including the felling of non-target species due to safety and access concerns, coupe EP048C – July 2013. Image - Vica Bayley

Cost of production:

As discussed above and confirmed by STT, historical supply of specialty timber into the market has been delivered as an ‘arising’ or byproduct of industrial scale eucalypt logging in tall wet forests, delivering a skewed price, quantity and quality supply profile. Price paid by processors has been heavily subsidised by the broader industry (and taxpayer) which built and maintained roads, carted machinery and conducted felling for eucalypt supply. Quantities of specialty timbers exceeded demand, with excess volume burnt on the coupe floor. This also had the effect of allowing suppliers to choose only the very best quality timber, the remainder was wasted.

The profoundly changed industry structure and logging techniques proposed in the Plan are guaranteed to generate costs significantly higher than those of historical, subsidised operations.

Given the use of the private sector to do the planning, harvest and haulage, the lack of expertise within responsible government departments and the species-specific nature of the silviculture, delivering lower volumes of timber yet incurring machinery float, road maintenance and other standard costs, cost of log production will be high.

There is no discussion of these anticipated costs in the Plan.

While the Plan relies on commercially untested silvicultural techniques, an ageing, unmaintained road network (within reserves) and areas somewhat remote from major processors, there is a woeful absence of discussion about the additional expense of planning, harvest, access and haulage.

Expectations of a supply profile based on historical price, volume and quality trends are unrealistic, as subsidies kept historic prices artificially low and the scale of logging maintained high volumes of high quality timber. The Plan's discussion of 'inferred log value'[xii] fails to account for the gap between historic pricing structure and projected 2017 production costs.

'Inferred log value' is a processors 'capacity to pay' for logs, derived by working backwards from retail price for sawn timber (historically subsidised). This has no relationship to true cost of production and raised the question 'who pays for the gap between cost of production and inferred log value? The taxpayer?

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

Demand analysis:

Basic supply/demand dynamics demonstrate the interrelated nature of cost of production, cost of sales and subsequent demand. However the Plan has no credible discussion about likely demand profile for timber produced from reserves. Given this timber will be more expensive and shrouded in conflict, and alternative, non-controversial sources exist (Hydrowood), demand for significant volumes of this timber is unlikely to materialise.

Indeed, one of the Plan's associated documents states that producers identify '*the Tasmanian brand as the most important'* driver for specialty timber demand[xiii], and notes that one significant constraint on demand is '*the controversial media image of the forestry industry in Tasmania*'. However, the Plan contains no analysis of the negative impact, on both the Tasmanian brand and the specialty timber brand (and demand), of supplying timber from areas listed as part of the Tasmanian Reserve Estate, or the likelihood that logging in reserves will exacerbate controversy.

It can reasonably be anticipated that retailing products sourced from logging rainforests in listed conservation reserves will create significant market-related issues including consumer concerns, resulting in downward demand pressure. Most, if not all consumers of specialty timbers would expect supply to be sustainably sourced. Those consumers would generally expect a 'reserve' to preclude logging so as to protect environmental and other values, and query whether wood from those areas was sustainably sourced with a broad social licence.

The Plan provides no comfort to such consumers, and no protection for the image of, or demand for, Tasmania's specialty species products.

The Market Demand Analysis supporting the Plan states that '*consumers are not just buying "special timbers" they are purchasing a …specific mix of'* design, functionality, craftsmanship and material.[xiv] This indicates the market for products of special timbers is volatile, discretionary and susceptible to a range of fashion, price, sustainability and other factors.

The Plan will have a negative impact on social licence, long term industry reputation and consumer confidence.

Conclusion:

The Wilderness Society does not support any logging in conservation reserves and rejects the notion that logging centuries-old trees from conservation reserves can, in any way, be considered sustainable.

As the Plan foreshadows logging in the Tasmanian Reserve Estate, significant uncertainty, conflict and product rejection is anticipated in key markets for special species products, given the volatile, discretionary nature of these markets and acknowledged, existing brand and reputational issues.

The Plan fails to adequately consider environmental impacts, cost of production, price sensitive demand profiles and other issues fundamental to the structural integrity of the special species sector. All these issues have a direct relationship to genuine supply needs.

Without credible, agreed data and a multi-stakeholder process, it is impossible to expect to resolve issues relating to special timbers supply, demand, market conflict and the long term economic, social and environmental viability of the sector.

The Plan represents a political document designed to provoke traditional, industry vs environment culture wars in the lead up to a state election, by making the case for logging in reserves, some of which have been declared for decades. This is condemned.

If implemented, the Plan would do extensive and significant damage to Tasmania's natural and cultural heritage values, supposedly protected with the Tasmanian Reserve Estate.

The Wilderness Society recommends adopting a multi-stakeholder approach to resolving issues within the timber industry and protecting all parts of the Tasmanian Reserve Estate in formal, dedicated reserves with a tenure that explicitly prohibits logging.

Snowy Range 2006 - discarded King Billy Pine log, prior to coupe burn – Vica Bayley

Tarkine rainforest – reserved but threatened with logging under the Plan – Rob Blakers

[i] http://www.twff.com.au/documents/research/epo74d.pdf
[ii] http://dpipwe.tas.gov.au/Documents/tas_reserve_class_areas_30th_june_2016.pdf
[iii] https://www.wilderness.org.au/new-forestry-tasmania-report-reveals-government-legislation-threatens-fsc
[iv] http://www.environment.gov.au/heritage/organisations/australian-heritage-council/national-heritage-assessments/tarkine
[v] https://www.environment.gov.au/system/files/resources/eefde0e6-0f83-486d-b0c3-8b1d25abc497/files/ivgconservation5aheritage.pdf
[vi] https://cdn.forestrytasmania.com.au/uploads/File/pdf/technical_bulletins/tb9_rainforest.pdf
[vii] http://www.stategrowth.tas.gov.au/__data/assets/pdf_file/0015/152403/Special_Timbers_Resource_Assessment_on_PTPZ_FPPF_RR_CA_Final_2017.PDF
[viii] https://cdn.forestrytasmania.com.au/uploads/File/pdf/technical_bulletins/tb9_rainforest.pdf
[ix] Email STT staff to Vica Bayley, 23 August 2017
[x] http://cdn.forestrytasmania.com.au/uploads/File/pdf/pdf2014/fmp_17_november_2014.pdf
[xi] http://www.forestrytas.com.au/uploads/File/pdf/technical_reports/DFRD_tr05_2011.pdf
[xii] http://www.stategrowth.tas.gov.au/__data/assets/pdf_file/0019/132382/SST_Final_report_Market_demand_analysis_11_Nov_2015.PDF (page iv)
[xiii] ibid (page iv)
[xiv] http://www.stategrowth.tas.gov.au/__data/assets/pdf_file/0016/152404/SST_Demand_Analysis_Final.pdf (page 3)

Reserved rainforest in takayna/Tarkine, proposed for logging. Image Rob Blakers