

7.18. George Harris

The Statement of Principles – A contribution

To: Mr. Bill Kelty
From: George Harris
Date: 08/03/2011

Dear Mr. Kelty,

Thank you for the opportunity to contribute the following to your efforts in facilitating progress on the Statement of Principles:

I am a designer and manufacturer of furniture and handcrafted products for retail sale in Tasmania's unique Special Timbers from our native forests.

I am one of 2,000 Tasmanians that are specialty artists, wood turners, wooden boat-builders, furniture designers and manufacturers, and who depend upon Tasmania's native timbers. These timbers are managed on a sustainable basis through Forestry Tasmania's Special Timbers Strategy.

I do not believe an agreement can be reached under the Statement of Principles that I would have any level of happiness with.

I do not believe an agreement can be reached that is in the best interests of the Tasmanian community.

I do not believe an agreement can be reached that is in the interests of myself or any other person of similar interests currently working, or likely to engage in similar work at any time in the future.

The Principles provide for *"ongoing specialty timber supply including eucalypt for our Tasmanian high value furniture and craft industries through a negotiated plan and timeline."*

Yet they also require that they *"Immediately protect, maintain and enhance High Conservation Value Forests identified by ENGO's on public land"*

A simple overlay of the maps within the Special Timbers Strategy showing Special Timbers distribution with those of the Wilderness Society and Environment Tasmania showing HCV forest identified by ENGO's reveal that the area sought would not make it possible to deliver any Special Timbers, let alone an on-going long-term supply.

I believe the process that delivered the current task was flawed, and that the Statement of Principles itself is a seriously flawed document.

While I believe that peace in the forests and an end to conflict over forestry issues would be a nice situation to be in, I believe that an understanding of the nature of the conflict and its motivations would lead any observer to conclude that such a set of circumstances, with an acceptable level of equity, cannot be delivered by negotiation, and certainly none that would have any level of permanence.

In such circumstances, I am completely opposed to bargaining away any further assets, especially those that I consider so precious: our Special Timbers.

I am disgusted that others in the bargaining process are seeking to negotiate assets on my behalf for which they have such little regard.

I believe these negotiations were entered into in circumstances of distress, and that Special Timbers are the ant that gets trampled when the elephants are stampeding to save themselves.

Not only should no surrender of territory or entitlement be contemplated, but there can be no surrender of territory or entitlement without compensation, and it is clear that the federal government have indicated that no further money will be available to provide compensation. Equally it is clear that the state government is not in a position to offer any compensation. No one, as far as I am aware, is entering this negotiation from the timber industry side with a preparedness to bargain away territory for no compensation, (or at least I hope that is the case!), and no one associated with Special Timbers that I know would regard anything as suitable compensation for trading away access to Special Timbers for generations to come.

Consequently, I could not support an agreement and I believe abandonment of the process should be considered.

Such abandonment of the process should be accompanied by a move to seek support on the floor of the Tasmanian House of Assembly for an affirmation of support for the native forest-based timber industry, for the support and extension of the RFA and the RFA process, and support for the Special Timbers Strategy and the Special Timbers sector, and a rejection of the concept that a transition from a native forest-based timber industry to a substantially or entirely plantation-based timber industry is either necessary or desirable.

A Labor state government with an honest and accurate understanding of its true constituency would support the native forest-based timber industry, as would a Liberal government from its support for the business sector, and the Greens members would be left where they deserve to be – alone and friendless. On a good day the Legislative Council would carry unanimously any motion in support of the timber industry, and on a bad day it would still be at least 13 – 2. So what is their problem???

Your's sincerely,
George Harris

Annexes: The timber industry including Special Timbers
 Location and growth rates
 Special Timbers Strategy
 The ENGO's and HCV
 World Heritage Area and nominated WHA extensions
 Gunns, The Wilderness Society and the Tamar Valley pulp mill
 The Wilderness Society and tax free status

The timber industry

I have a concern for the whole timber industry, not just one part of it. In Tasmania it is important to understand that no part of the industry stands completely on its own, and some of the smaller parts could not survive without proximity to the mainstream activities. Many see the timber industry just in terms of the supply of a commodity, but there are areas in the application side where the source of the timber, its characteristics and the story behind it are important. This is especially so in the furniture and woodcraft sector, and in the boatbuilding sector.

Special Timbers

Special Timbers are unique and endemic Tasmanian timbers that are found in limited quantities in particular areas of our native forests. They are highly prized by woodworkers for their decorative qualities and their application to specific purposes, and include Blackwood, Myrtle, (especially Tiger Myrtle), Musk, Celery-top Pine, King Billy Pine, Huon Pine, Blackheart Sassafras, and numerous others.

These species are the basis of a manufacturing industry that directly employs 2,000 people in FTE (full time equivalent) positions, and a further 8,500 people engage in related activities either as a hobby, or to a limited commercial extent. (Farley & Bishop, 2009) These timbers cannot be substituted by any other timber. Special Timbers occupy iconic space in our artistic, cultural and heritage landscape.

Special Timbers are an inalienable part of an industry that comprises furniture designers and manufacturers, wood turners, sculptors, musical instrument makers, wooden boat builders, and the craft shops and galleries that are an iconic element of our tourism and visitor experience. These have put locations like Strahan, Richmond, Geeveston, Stanley, and Salamanca Place on the map. They have given outlets like the Design Centre in Launceston and the Tasmanian Wood Design Collection a well deserved international reputation. The combination of stunning materials, brilliant design, and flawless execution have raised Tasmanian made timber products to the equal of any that can be found anywhere on the planet.

The recent Australian Wooden Boat Festival in Hobart is a reminder of just how special our boat building timbers are.

Huon Pine, Celery-top Pine and King Billy, which only grow in Tasmania, are recognised

internationally as among the finest boat-building timbers available.

This festival is not just about museum pieces, magnificent though they are, it is just as important for new work, for keeping skills alive, and for creating new opportunities.

The making of musical instruments is emerging as a significant activity in Tasmania, and many makers are using Special Timbers. It is believed there are sixty active makers, and an exhibition in Hobart in 2009 displayed the work of forty musical instrument makers, past and present.

Instruments currently being made in Tasmania include guitars, (both electric and acoustic), violins, harps, drums, recorder, clarinet, and recreations of medieval designs in string and wind instruments.

There are instrument makers in Tasmania reproducing medieval designs whose entire output is being commissioned and sold in Europe over the internet.

Considerable interest in Tasmanian Special Timbers is developing in America, and is resulting in sales and exporting of timber blanks for guitars as well as the work of local guitar makers.

Location and growth rates

Special Timbers exist in limited quantities in specific areas. These are usually in the wetter areas, and most that remain are locked up in existing reserves.

There is one truism concerning our Special Timbers: You cannot harvest them where they do not grow! Another is this: You cannot manage a reserve as if it was a production forest, and you cannot manage a production forest as if it were a reserve!

Most Special Timbers have slow to very slow growth rates. Blackwood can produce a saw log in 80 to 90 years. Myrtle and Blackheart Sassafras require at least 200 years, and preferably longer. It takes at least 400 years to get a good Celery-top Pine. Huon Pine and King Billy Pine can take 800 years to reach a suitable size, and the oldest Huon Pine was measured by core sample to be 3,300 years and still growing.

This makes an absolute nonsense of the claim by Environment Tasmania in their recently released timber industry policy that Special Timbers should be grown in plantations! Huon and King Billy have a strong natural defence in that their oil is a fungicide and insecticide. This greatly slows their susceptibility to rot and decay, and they can lie on the forest floor for a very long time. The opposite is the case for Myrtle and Sassafras, which deteriorate rapidly, and must be forwarded to a saw mill without delay or degradation will begin to occur.

The long existing policy of delivering Huon Pine in low quantities without felling living trees is appropriate, and possible because a significant amount was placed in long term storage

from harvest in areas that were flooded in hydro-electric power development schemes, (Gordon-Pedder and Lake Burbury), and a significant amount remains available from salvage on the Teepookana Plateau near Strahan, and other areas, aided by the natural durability of the timber.

Most of the remaining area on the Teepookana Plateau has been targeted by the HCV lock-up. This is utterly unacceptable.

The ENGO's participating in the Statement of Principles process have a misguided idea that Special Timbers can continue to be available from salvage off the forest floor following harvesting operations, and in some cases years after the event if regeneration burning for some reason has not occurred. This is wrong for two reasons. Firstly, anything that meets the specifications of a Category 4 saw log, (Special Timbers), would have been recovered because of its value to the feller and harvesting contractor, and secondly any out-of-specification (defect) log would have deteriorated to the point of minimal value, including to the end user, especially if it had been left for any period of time, unless it was Huon Pine in which case it would have been recovered anyway.

This misguided idea arises from a completely discredited report written in 2004 by one of the founding members of Timber Workers For Forests. (a misleading name for a group opposed to the traditional industry) This report refers to an audit conducted by this person on residue left after logging on Coupe EP074D. Logging on this coupe had been completed, but the coupe had not been closed, and regen burning had not at that stage occurred. The TWFF report indicated that on this single coupe an amount of 65,440 cubic metres of Special Timbers was left behind. This is more than five times the total yield of Special Timbers across all coupes in the whole state for the year 2008-09! At the time one commentator suggested there would have to be trees growing on top of trees to generate that much timber, even before harvesting and removal of saw logs!

The request by The Wilderness Society and Environment Tasmania for an immediate audit of un-burnt logging coupes from previous years to quantify timber salvage and wood bank opportunities (esp. for special species) indicates that this erroneous and misguided concept still drives their thinking.

Special Timbers Strategy

A considerable effort was made by Forestry Tasmania in developing the Special Timbers Strategy, which was officially launched in March 2010 following an extensive consultation process. Submissions were invited from interested persons following a period of display of the Strategy in draft form during 2009. The Strategy adopted the STMU's (Special Timbers Management Units) from the RFA and added around 20,000 hectares of mature eucalypt forest in recognition that such timber should be managed under the same regime as Special Timbers for the qualities of the timber, which include burl and fiddleback grain features prized by woodworkers. This mature eucalypt forest is also rich in Special Timbers.

The essence of the Special Timbers Strategy is to provide an on-going long-term supply of Special Timbers with three objectives: to sustain the resource, maximise value recovery, and to promote Tasmanian Special Timbers to the world. These are consistent with the 2008 Sustainability Charter, and involve non-clearfelling harvesting techniques and rotations of 200 years or greater.

It is unacceptable that any incursion be made on the capacity or intent of the Special Timbers Strategy.

A simple overlay of the maps within the Special Timbers Strategy showing Special Timbers distribution with those of the Wilderness Society and Environment Tasmania showing the claims of HCV forest reveal that the area sought to be included in the moratorium would not make it possible to deliver any Special Timbers, let alone an on-going long-term supply. A reduction in area leading to a reduction in the quantity of Special Timbers that can be supplied in a sustainable manner is completely unacceptable.

The ENGO's and HCV

The area available under the Special Timbers Strategy was derived from the STMU's (Special Timbers Management Units) identified in the RFA, (Regional Forest Agreement), which applied clear and defined criteria for determining reserve boundaries and areas of high conservation value.

This was a scientific process that was available for all to scrutinise.

In areas of state forest that were generally available for timber production, a more detailed examination involving on-ground evaluation is available to determine the exact layout and procedures in accordance with the Forest Practices Code to produce a Timber Harvesting Plan. These procedures are accepted as an accurate means delivering all requirements, including the scope and intent of the EPBC Act.

However, this is obviously not acceptable to the ENGO's, who prefer their own process, and their own criteria, whatever they are.

It is felt by most in the timber industry that the decisions that permitted and encouraged the ENGO's to nominate whatever they felt to be HCV forest without any reference to any established criteria, or any requirement to justify the criteria they might happen to use, or any questioning or inquiry as to what that criteria might be have been a major flaw in the process.

Anecdotes circulating about how ENGO representatives have been observed discussing areas and drawing lines on maps have left industry people flabbergasted. How people's working lives, investments, and industry futures can be determined by such a means is utterly unsupportable.

The fact that areas of re-growth, and areas containing actual plantations can be described as HCV forest and included in areas nominated for reservation is reprehensible.

World Heritage Area and nominated WHA extensions

The ENGO's have nominated additional reserve areas on the basis that they think it is appropriate to extend the World Heritage Area boundaries. This is despite a recent request by ENGO's and Greens members of parliament to extend the boundaries having been assessed by a visiting delegation from the WHA Committee in 2008 and comprehensively rejected.

One of the grounds for the ENGO's seeking to extend the boundaries was to provide a buffer around the WHA. However, it is quite clear in the documentation of the declaration of the WHA that the current boundaries contain buffer zones within them that protect the values and the elements that led to the nomination in the first instance.

Consequently, any move now to extend the boundaries on this basis is absolutely rejected.

Gunns, The Wilderness Society and the Tamar Valley pulp mill

Gunns is a company that has been around for a long time. During the 1980's it was a medium level timber and saw milling company. At that time the conservation movement had become established and had won major victories in its No Dams campaigns. These campaigns were winding down, and a number of people were discovering they had paid occupations that were more fun than real jobs, and new campaign areas had to be developed around which fundraising activities could succeed. It was discovered that these new organisations depended upon a model of perpetual conflict, and it was a strategic and tactical error to participate in the final resolution of a conflict. The longer a conflict could be drawn out the better.

The forests and forestry campaigns were ramped up as the No Dams campaigns wound down. Many small to medium timber companies were worn down by the campaigns. Many sold out or closed, and at this point Gunns decided to go on an acquisition drive, and it became a large and successful company. It bought up many distressed assets across all facets of the timber industry, including hardwood and softwood mills, veneer plants, woodchip mills, and ultimately acquired and developed a plantation estate. It became the only company on the ASX 200 to be listed as headquartered in Tasmania. It thought it could withstand the sustained attack of the environment movement.

Meanwhile, the Wilderness Society and other related groups participated in the Forests & Forest Industry Strategy, which ultimately delivered the signing of the RFA in 1997 after a process lasting six years. The Wilderness Society participated for the whole of that time, but withdrew at the last moment on the last day when the signatories had picked up the pens to sign the documents. It had extended the conflict as long as it could in that process, but has continued ever since, and has won more concessions than would have been possible if it had signed the RFA. It continues to attack the RFA to this day.

It seems every time they come around, we give them something. The RFA was substantially bastardised by a political campaign during the 2004 federal election in a process that resulted in the 2005 Tasmanian Community Forest Agreement. That agreement was a substantial capitulation, and in that agreement we locked up more forest than we ever should, including areas of very valuable Special Timbers. In that agreement over 80% of the Myrtle that was available at that time was locked up. And here they are again!

The difference here is that this time they have been tempted to actually sign something, although it was not an agreement, but a process to lead to an agreement. Any piece of paper they were likely to sign was never going to be a piece of paper that the timber industry would like the look of, and boy is that the case!

For years now the Wilderness Society and others have run a comprehensive campaign against Gunns, demonising the company in the process. They have sought to sabotage Gunns' international markets, and have picketed and bullied the offices of their customers in Japan. They have sought to promote FSC as their preferred certification scheme, having taken over and manipulated the Environmental Chapter of FSC in Australia. Some of the Wilderness Society representatives that have participated in the Statement of Principles negotiations are the same people who have shaped the development of FSC in Australia.

In contrast to what occurs overseas, FSC in Australia has more plantation area under certification than native forest, and it is much more difficult to achieve FSC certification for native forest harvesting. It seems that it is not designed to be available, rather, it is designed to be not available!

The Wilderness Society and others have campaigned solidly against the Tamar Valley pulp mill proposal, and have been instrumental in the mill now seeking to be entirely plantation fed. In addition, it is likely that significant areas of plantation that Gunns owns will not be able to gain FSC certification under the provisions that have been written into FSC in Australia.

The conservation movement has been split in Tasmania over opposition to the Gunns Tamar Valley pulp mill proposal. It will be a real test of the Wilderness Society to see how it negotiates the rest of the Statement of Principles process under these circumstances. Its support for this proposed pulp mill may be a price too high, even in exchange for the maximum amount of forest going into new reserves. It is a bad deal for the timber industry: too much forest for a neutered pulp mill.

The biggest issue for the native forest-based saw milling industry is the market for its residue in the fibre sector. If the existing saw mills, which are flourishing after having bounced back from the recent downturn, cannot dispose of their residue for a reasonable return, they would have to close in a matter of weeks. The original pulp mill proposal was seen as an opportunity to have a market for the residue that could compete with or even replace the faltering export market.

So why would the native forest-based saw millers support a loss of resource for a pulp mill that will not do them any good in any other way?

The Wilderness Society and the elected Greens do not support native forest sourced saw mill residue being put to any commercial purpose. They are opposed to its export as chips, its use in an on-shore pulp mill, or its use in renewable energy generation. This is utterly reprehensible. This is contrary to the requirements they place on every other industry – maximise the use of waste, recycle waste products, extract maximum value, etc. It is unacceptable that once a log has been fairly and properly classified as a saw log, its by-products cannot be used in this way. No movement on these issues is sufficient justification for saying not one additional square metre should go into reserves.

Would I trade any percentage of the already restricted Special Timbers for the pulp mill, a pulp mill, or any pulp mill? No way!

The Wilderness Society's behaviour and tax free status

The Wilderness Society is registered as an Environmental Organisation, and as such has tax free status on its income similar to that of a charity. As such it is one of the few organisations that can act in a manner that can be described as a secondary boycott. This behaviour has long been not available to trade unions and other organisations. However, The Wilderness Society is alleged to have been engaging in activities that should cause its tax status to be revoked. One of the proscribed activities is to engage in those of an overtly political nature. It is widely believed that The Wilderness Society has been channelling money into other groups, and guiding the activities of those groups. These groups include The Huon Valley Environment Centre and Still Wild Still Threatened. It was recently alleged that the Wilderness Society established Our Common Ground as a front group, and funded its recent television ad campaign against forestry activities to the tune of \$600,000

Following pages: An article from 'The Truth' newspaper, (Melbourne), of June 6, 1946, documenting the story of the Heather girls, who were harvesting timber in the area Senator Christine Milne recently demanded be vacated as it was designated HCV forest.

... a selected article, for the record

Amazing Story Of Girls Who Work Mill In Deep Tasmanian Bush

WHEN Truth first heard of the Heather family in Tasmania we were frankly sceptical. The idea that three girls—one only 16—could fell giant trees, haul the huge logs to the mill over more than a mile of track which they had helped to lay, and generally assist in the conduct of their father's timber mill at Cockle Creek, as capably and efficiently as the team of grown men they replaced during the war, seemed more like a subject for Ripley. But seeing is believing, and we take off our hat to the pioneer spirit and the physical toughness of this Tasmanian family whose record is unparalleled in Australia.

STORY FOR RIPLEY

WE met them at the end of an 80-mile journey, 20 of which were over a rough bush track passing the ghost-town of Catamaran.

Literally miles from anywhere, Cockle Creek is reached either by road or sea. The latter route is the one most favored, a fact which Truth can appreciate after travelling over the tortuous bush road, which, girded by dense undergrowth and gnarled gums, offers little incentive for travel to the tourist or casual sightseer.

Truth was greeted by Mrs. Heather and her eldest daughter, Dulcie. Mr. Heather, it was explained, was absent at the doctor's.

Nearest doctor was at Dover, about 27 miles distant.

Mrs. Heather was quite pleased to give all the information we required about her daughters. She took us to the mill, where she went into a detailed description of its working, and then asked if we would like to see her other daughters, who were in the bush felling trees.

"Felling trees?" we gasped. "Oh, that's nothing," she replied; "they don't think that's very hard work."

We said we would like very much to see these daughters, so Dulcie was detailed to lead us to the spot.

"How far do we go?" we asked. "Not far," replied Dulcie; "about 1½ miles. We walk up this tram track."

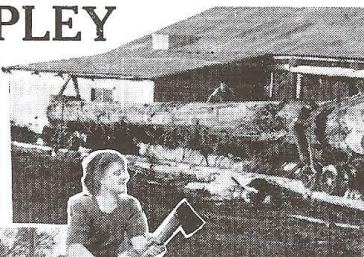
DULCIE'S STORY

We looked at the tram track. Built from logs cut into 24 feet lengths, it stretched, apparently interminably, up the side of a hill, to disappear in the undergrowth. At places, the track was about 10 feet from the ground, and was a masterpiece of bush craftsmanship.

"It's what the tractor runs along, to haul logs to the mill when they have been cut," Dulcie explained. "My father, brother, two sisters and myself built it in eight months. We constructed it by hand-labor, with the aid of a horse. In some places we couldn't use the horse, so rolled and handled the logs into position by ourselves."

Again we gazed at the track and noticed the 12-foot cross bars which were placed at intervals of 12 feet, and the sturdy uprights which supported the track where it passed over the small gullies.

Dulcie stepped nonchalantly on to the track and began to walk along the log runners, striding out without the least hesitation. Gingerly we followed, our photographer bringing up in the rear.



(Above) Rolling off a log at the mill. (Left) Part of the 1½ miles from track constructed by the family. Each log is 24 feet long and cross beams 12 feet long. (Inset) Jean with axe she uses to fell forest giants, stripping bark to fall on boughs and make a platform.

"It gets a bit high here," said Dulcie. "You'd better walk on the ground if you feel uneasy." We managed a hollow laugh. "It's all right," we replied gazing down at 10 feet of air between us and the ground; "we're enjoying it."

We edged over the danger point while Dulcie, hands in pockets of her slacks, strode out as if walking along a main thoroughfare.

The top of the track was reached without mishap. There was no sign of Dulcie's sisters or brother; but, suddenly, there was a loud crash.

"That's they," said Dulcie. "They've just felled a tree."

She looked at the soggy ground. "They went that way," she said. "There are their footprints."

We followed her into the dense scrub, under an overhanging canopy of knotted gum boughs and autumn-tinted leaves. There, we found her sisters who, with their 18-year-old brother, George, were boiling the billy for their midday meal.

Nancy, the second eldest, is 20. Dressed in a pair of black slacks, blue, open-necked shirt, and bushman's vest, she leaned on her razor-sharp axe, as she displayed the log she and her sister and brother had just felled.

Ninety feet long it was, and 12 feet around the base. Nancy said it took 1½ hours to bring down.

Pretty, 16-year-old Jean, dressed in

Shy at first, the girls became more talkative under the mellowing influence of a cup of billy tea which they sipped as they discussed their lives.

They were quite happy doing bush work, said Nancy, although they missed some of the attractions of city life.

Their father used to employ 24 men, George explained, but, because of the war and manpower shortages, the girls had taken on the job of working the mill and doing the bush work.

Dances? Yes; they went to dances,

Dulcie said; but not very often, as the nearest town, Southport, was about 15 miles away.

"When we go, we don't get home until about four o'clock," Jean explained.

They had been doing bush work only since last November, but for three years they had worked in the mill. For eight months they had been building the tram track for hauling logs to the mill.

During the evenings, they listen to the radio, sew, knit, or do fancywork. Asked if they found axe work hard on their hands, Jean said it was at first, but they became hardened and now do not worry a bit about them.

She held out her hands. Blackened with sap from the trees, they were hard and firm without being calloused.

"It makes it a bit hard for sewing," added Nancy, "but as we make all our own dresses, you can see it doesn't affect us much."

We asked Dulcie what she did.

Her sisters laughed as she replied: "Oh, I don't do much of the hard work. I do the tallying, keep the records, do the book-keeping, and help in the mill when it's necessary."

They explained how the hauling was done from the bush to the stand where the logs are placed on trolleys, which are pulled by the tractor to the mill.



When the logs reach the mill, the girls and George cut the logs with the cross-cut saws into 14, 16 or 18-foot lengths.

These are loaded on to the breaking-down frame which splits them in the middle.

Mr. Heather and Jean work the Canadian carriage which cuts the wood into fitches of any size required. Jean and George are the tailers-out, and Nancy drives the 32-horse-power engine under the control of her father, who holds a first-class ticket. Dulcie operates the docker which trims the timber ends.

During fine weather, the girls and George fell trees, working in the mill when the weather is too bad to go into the bush.

Three times a week one of the girls rides the horse the three-mile trip to Catamaran for the mail.

Starting work at 7.30 in the morning, they finish at 5.10. These are the union hours, they explained.

Nancy added: At present we work 44 hours a week, but, like many others, we hope that this will soon be reduced to a 40-hour week.

With typical feminine modesty, none of the girls would reveal what wages they received, nor would Dulcie reveal any of the figures for the mill.

On returning to the mill, Mrs. Heather continued the story.

When her daughters and son finish at night, they feed the horses, fowls, and pigs, and milk the cows. Each has an allotted task. They finish about the same time and never squabble about doing more than each other.

"We don't suffer from the petty bickerings which spoil the harmony of many families," she added.

As Truth departed, the girls waved goodbye. Their sunbrowned faces and healthy appearance dispelled any doubts we had about their mode of life and their unfeminine occupation.

Smoke-oh! (Left to right): Dulcie (23), Nancy (20), Jean (16) and George (18) — who run the Heather timber mill at Cockle Creek as a family affair.

7.19. Diversity Tasmania

DIVERSITY TASMANIA

patterns through space and time

to Joel Bowden / Bill Kely

Thanks for your invitation to express our interest as a stakeholder in the future of Tasmania's native forests and their interreliant communities. We confirm our wish to be a genuine participant in the process and the solutions. Diversity Tasmania, as a broad based and statewide not for profit organisation, has been advocating for the "public interest" (often opposed to self or stakeholder interests), for and on behalf native forests, communities, society, and diversity and interrelations generally since 1990.

We see the current Statement of Principles (SoP) as the determination of "interested" or narrowly focused professional or nonconsultative parties. It has serious shortcomings due to misguidance, misdirection and some trickery, and that regardless of goodwill, the SoP is inadequate and flawed. It will not, as it stands, lead to a resolution of conflict and a better society, or enable a sustainable high value added timber industry within a broader diverse economy, or adequately protect the ecologically required conservation areas.

However, with a fresh approach, broader representation and better guidance, all is not lost. Resolution of meaning, interpretation and intention of the SoP will be difficult, and those issues not covered, resolved or thought through are problematic. Of note are the issues of scale and value, increased pressures on areas outside ENGO's HCV areas and on private land, resolution on other priority areas of ecological conservation, legislative reform covering all facets and practices, fairness, independence and effectiveness of planning and regulation, and resource security, conversion and transition.

You seemed to indicate that you were not currently seeking detailed analysis by us, nor full exposition of our views on the way forward. Actually, we perhaps incorrectly assume that while of interest they are not your current concern, rather that your role is as a facilitator, to bring people together in a better fashion that they might work things out. We are interested in meeting with you in the near future, with the view to positively contribute as a genuine stakeholder group, and with others to develop these principles further and to develop a plan for implementation. We would not take on this task lightly as we see its size and the difficulties involved, but we see that the current momentum is best not lost or there may be no significant future forest industry outside tourism and a bleak future for rural tasmania generally, and we are committed to acting for the forests and the greater good.

There is however an overdue stumbling block. There is no future for this process with the current participants if there is not an immediate public declaration, an actual demonstration of good faith by the signatories, that all logging and associated activities in the HCV designated areas is ceased, and that this declaration should be clearly supported by government. Any delay can only be construed as voiding the value of their signatures. Then the important further work can progress, and then we could optimistically and positively contribute.

Diversity Tasmania has authorised me to coordinate and represent on this issue. As such, I can be approached directly by you at the email address you initially used or phone 0417 384 713 , and trust you will treat these as private and for no other purpose. It is preferable and more appropriate, unless there is need for strict confidentiality, to contact via the email address : diversitytasmania@yahoo.com.au . I am based in Northern Tasmania and look forward to meeting with you for preliminary discussions.

Cheers - Tony Elkin

7.20. Tasmanian Conservation Trust



Upper Meander Catchment Landcare Group



The Environment Association (TEA) Inc

Caring for Home

Established 1990

Reedy Marsh Forest Conservation Group

Hon David Bartlett MP
Premier
Parliament House
Hobart Tas 7000

24 December 2010

Dear Premier,

Tasmanian Forests Statement of Principles

On 28 November 2010, representatives of the undersigned conservation organisations met at the Grange in Campbell Town to discuss their views on the document: 'Tasmanian Forests Statement of Principles to Lead to an Agreement' (SoP), dated 14th October 2010 and presented to you on 19th October 2010.

A total of ten individuals, including representatives of eight conservation organisations, attended the meeting. A number of other conservation organisations expressed interest in attending but were unable to attend on the day.

The meeting was called to provide a forum for those groups and individuals that are not represented by the three environment groups who negotiated and signed the SoP. All those groups who attended do not endorse the SoP in its current form.

The meeting gave all those present an opportunity to make comments on and discuss every one of the principles and other sections of the SoP in significant detail.

The meeting agreed we would write to you outlining the broad position of the organisations represented in relation to the SoP.

At the 28 November meeting we agreed that:

- The SoP promises some important outcomes for forest conservation, in particular forests in wilderness areas.
- The SoP has many serious weaknesses and omissions, however we did not completely reject it.
- The SoP fails to present a complete plan for the conservation of forests nor is it likely to lead to a resolution of the conflict over forestry in Tasmania – two goals our organisations strive to achieve.
- The SoP is a first step that we hope can be built on by governments, industry, rural communities and conservation groups.

- We welcome your government's promise of 'broad community consultation' in developing a strategy to meet the laudable goals of the SoP. We seek inclusion in the process to work constructively with the State Government and other stakeholders to deliver a better outcome.

Those who met on the 28 November agreed to continue meeting to establish a forum for further discussion and potentially to provide input into future government consultative processes in relation to the SoP. Other interested organisations will be invited to participate in future meetings.

Representatives of our groups would welcome an opportunity to meet with you to discuss the matters raised in this letter. Please contact Peter McGlone at the Tasmanian Conservation Trust, 191 Liverpool St, Hobart 7000, phone 03 6234 3552, mobile 0406 380 545 or email tct6@bigpond.com to arrange a meeting or for further information regarding our concerns. The TCT has undertaken to disseminate any response to this letter to the undersigned organisations.

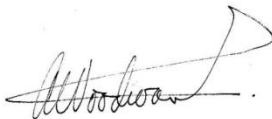
Yours sincerely,



Peter McGlone
Director
Tasmanian Conservation Trust



Andrew Ricketts
Convenor
The Environment Association (TEA) Inc.



Annemaree Woodward
Reedy Marsh Forest Conservation Group



Kevin Knowles
Upper Meander Catchment Landcare Group



Neil Graham
President
Western Rivers Preservation Trust



Tony Elkin
Diversity Tasmania



Phil Parsons
President
Tasmanian Arboretum

cc

- Hon Bryan Green MP, Tasmanian Government Minister for Energy and Resources
- Hon Brian Wightman MP, Tasmanian Government Minister for Environment, Parks and Heritage
- Senator the Hon Joseph Ludwig, Minister for Agriculture, Fisheries and Forestry
- Hon Tony Burke MP, Minister for Sustainability, Environment, Water, Population and Communities
- Hon Nick McKim MP, Leader of the Tasmanian Greens
- Hon Will Hodgman MP, Leader of the Tasmanian Liberals

Hon Julia Gillard MP
Prime Minister of Australia
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

12 January 2011

Dear Prime Minister,

Tasmanian Forests Statement of Principles Agreement: Biodiversity Review Panel report provides a potential process for defining High Conservation Value Forests

The Tasmanian Conservation Trust welcomed your media release of 7 December 2010, 'Statement of action on the Tasmanian forestry principles', in which you committed your government to a number of actions as initial steps in progressing implementation of the Tasmanian 'Forests Statement of Principles Agreement' (FSOPA).

The TCT is greatly encouraged by your announcement that, as part of the proposed due diligence assessment of the Tasmanian forestry industry, your government will seek clarification of 'detail and definitions contained within the Statement of Principles including High Conservation Value forests' (HCVF). The TCT shares your government's apparent concern that the FSOPA has failed to define this key term.

The TCT wrote to you on 18 November 2010 identifying numerous key shortcomings of the FSOPA, most critically the failure to properly address the need for protection of native forests for biodiversity conservation, principally found on private land. However, we also acknowledged that the FSOPA promises a very good outcome for the protection of HCVF on public land, mainly in wilderness areas. In summary the FSOPA promises good outcomes for wilderness protection but poor outcomes for biodiversity protection.

The FSOPA fails to include a comprehensive and scientifically based definition of HCVF or outline a process for the identification of HCVF. If not addressed, this failure will undoubtedly leave much of Tasmania's HCVF, predominately the high biodiverse forests on private land, unrecognized and unprotected.

The FSOPA also fails to acknowledge the need for an ongoing process to assess conservation values of forest areas which remain available for logging, incorporating new knowledge regarding forest values and the impacts of logging.

The purpose of this letter is to point out that a process for identifying HCVF has, in large part, been created by the April 2009 report to the Tasmanian Forest Practices

Authority (FPA), 'Review of the biodiversity provisions of the Tasmanian Forest Practices Code'. We have attached the 'Overview of key findings and recommendations' section of the report but the complete report is available on line at:
[http://www.fpa.tas.gov.au/index.php?id=40&tx_mininews_pi1\[showUid\]=30&cHash=9c6346860f488d88d22dfaafdddef941](http://www.fpa.tas.gov.au/index.php?id=40&tx_mininews_pi1[showUid]=30&cHash=9c6346860f488d88d22dfaafdddef941)

We have also enclosed an article which summarises the report's background, recommendations and the TCT's response to it.

The report was produced by the Biodiversity Review Panel, a group of eminent and independent Tasmanian forest ecologists and forest managers. It was commissioned by the FPA to provide a thorough scientific review as part of the ongoing, but currently suspended, review of the biodiversity provisions of the Tasmanian Forest Practices Code.

The changes recommended in the Biodiversity Review Panel report, if implemented, would provide a much improved framework for the identification and conservation of forest biodiversity through the Tasmanian Forest Practices System.

In July 2010, the FPA suspended the review of the Forest Practices Code while it sought clarification from the state government on matters of future forest policy.

We urge your government to work with the Tasmanian Government to ensure the policy matters, which have held up the review of the Forest Practices Code, are addressed urgently and that the review is re-started and completed as soon as possible.

Rather than re-invent the wheel in respect of defining HCVF, the Australian and Tasmanian governments need only implement the recommendations of the Biodiversity Review Panel report.

An improved regulatory framework, including amendment of the Forest Practices Code, coupled with reservation of currently identified HCVF on public land and provision of incentive programs to protect HCVF from logging on private land (as per our 18 November letter), would provide a complete and scientifically defensible strategy for conservation of HCVF in Tasmania.

Yours sincerely,

Peter McGlone
Director

Enclosed:

- 'Review of the biodiversity provisions of the Tasmanian Forest Practices Code', 'Overview of key findings and recommendations', pages 1-19, report to the Tasmanian Forest Practices Authority, April 2009.
- 'Review of the biodiversity provisions of the Forest Practices Code', Tasmanian Conservationist, June 2009.

Cc Senator the Hon Joseph Ludwig, Minister for Agriculture, Fisheries and Forestry
 Hon Tony Burke MP, Minister for Sustainability, Environment, Water, Population
 and Communities

Hon Tony Burke MP
Minister for Sustainability, Environment, Water, Population and Communities
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

27 January 2011

Dear Minister,

Tasmanian Forests Statement of Principles Agreement and the need to protect swift parrot breeding habitat in Tasmania

The Tasmanian Conservation Trust is concerned that the critical breeding habitat for the nationally endangered swift parrot (*Lathamus discolor*) is not being considered for protection as part of the 'Tasmanian Forests Statement of Principles Agreement' (FSoP).

We urge you to work with the state government to ensure that the implementation plan currently being developed for the FSoP recommends the protection of swift parrot breeding habitat.

While we have been told by Senator Joseph Lugwig that he is the 'Australian Government minister responsible for forestry matters' (letter to the TCT, 20 December 2010), you have portfolio responsibility for conservation of threatened species listed on the schedules of the EPBC Act, including the swift parrot. More specifically, you have responsibility pursuant to section 269(2) of the EPBC Act, to work with state governments to implement threatened species recovery plans adopted under the EPBC Act.

You may be aware that the national 'Swift Parrot Recovery Plan', adopted under the EPBC Act on 26 March 2002, lists as an objective:

To implement management strategies at the landscape scale to protect and improve priority habitats and sites resulting in a sustained improvement in carrying capacity

The TCT is a representative on the National Swift Parrot Recovery Team which has a role of coordinating the development and implementation of the recovery plan. Over several years it has become increasingly clear from the briefings we receive while attending these meetings that current state government policies and programs are failing to adequately protect even the most important breeding habitat in Tasmania.

It has also been made clear at the recovery team meetings that the over-riding priority for conservation of this species on a national basis is protection of breeding habitat, which is found only in Tasmania. We understand that the 'Draft National Recovery Plan for the Swift Parrot *Lathamus discolor*', currently in preparation, formally recognises this as the highest priority objective for the species.

With this in mind it appears that the FSoP could be an historic opportunity to secure the vital breeding habitat of the swift parrot. However the areas which have been proposed for protection, by the conservation organizations which are signatories to the FSoP, are predominately wilderness areas found in parts of Tasmania which include very little of the swift parrot breeding habitat.

We have attached a January 2011 map which shows swift parrot breeding habitat (map provided to the members of the recovery team by the Tasmanian Department of Primary Industries, Parks, Water and Environment) and a July 2010 draft map of proposed reserves produced by Environment Tasmania as an input to the FSoP process.

The ET proposed reserves (the areas shaded dark brown and light brown on the map) would incorporate very little of the swift parrot breeding habitat. We have only been able to do an elementary analysis based on over lapping the two maps, but it is clear that very little of the identified important breeding areas (IBAs) are proposed for reservation. Excluding the Maria Island IBA, which is entirely within an existing national park, no reserves are proposed for four of the other eleven IBAs. Also, we estimate that 5% or less of the identified nesting habitat within the remaining seven IBAs is proposed to be reserved.

Based on figures we have received from the Tasmanian Government we know that 47% of high and medium density breeding habitat is found on private land and none of this is included in the reserve proposals of Environment Tasmania, which relates only to forests on public land.

Clearly the proposed reserves were not planned with the swift parrot's habitat in mind and would, if obtained, not achieve a significant outcome for the species. While this letter focuses on the swift parrot, it appears that threatened species generally were not taken into account in the preparation of these reserve proposals and we hope you share our concern regarding this omission.

The TCT wrote to you on 18 November 2010 identifying numerous key shortcomings of the FSoP, most critically the failure to properly address the need for protection of native forests for biodiversity conservation. To address these short-comings, we recommended a number of measures, principally the allocation of funding for a private forest incentive program to protect areas of high biodiversity on private land, including threatened species habitats, and that any proposed transition of logging

out of public native forests be based on the identification and protection of high conservation value forests as a priority.

If these measures were implemented and adequately funded, swift parrot breeding habitat would undoubtedly be viewed as having the highest conservation value and therefore be given the highest priority for protection on public and private land.

We strongly urge you to support these proposals, as a means of protecting swift parrot breeding habitat and other important biodiversity values, and ask that you encourage the state government to endorse them as a key element of the implementation plan currently being developed for the FSoP.

The TCT believes that, as the Australian Government minister with responsibility for conservation of the swift parrot and other EPBC Act listed threatened species, you have a clear portfolio responsibility to support programs and policies which aim to improve the protection of key habitat. Furthermore, your support for these programs and policies does not clash with Senator Ludwig's role as minister responsible for forestry policy.

The private forest conservation program that the TCT proposes would be voluntary and, rather than restricting land owners' opportunities to log their forests, would simply offer an alternative source of income to logging.

We also believe that it is your role as environment minister to ensure that the FSoP implementation plan includes scientifically based definitions and processes for determining high conservation value forests and therefore priorities for protection. Without any doubt, the breeding habitat of nationally listed endangered species such as the swift parrot should be accepted as having the highest conservation value of all forests and we seek your support in having this recognised.

Yours sincerely,

Peter McGlone
Director

Enclosed:

- 'Swift parrot breeding habitat and important breeding areas', produced by the Tasmanian Department of Primary Industries, Parks, Water and Environment, January 2011.

- 'Draft Environment Tasmania reserve proposals', produced by Environment Tasmania as an input to the Tasmanian Forests Statement of Principles Agreement process, July 2010.

Cc

- Chris Tzaros, Chair, National Swift Parrot Recovery Team, C/- Birds Australi

7.21. Clive Stott

9 Alpine Crescent
Grindelwald
Tasmania. 7277.

7th March 2011
Without Prejudice

Mr. Jim Wilson

Plantation Standards and Services Manager
Gunns Ltd.
76 Lindsay Street
Launceston
Tasmania. 7250

Dear Sir,

Plantation Burning Policy

I refer to your recent email and telephone call regarding Gunns Limited Proposed Plantation Burning Policy.

You are seeking my input into this policy; acknowledged the amount of time I have invested on this issue; and would like my comments as to where Gunns Limited have got to so far with the Policy.

I note you mention, *“Gunns Limited are in the process of developing a policy on plantation burning in Tasmania.”*

This tells me Gunns are admitting to NOT having a policy on plantation burning in the past if as you say Gunns are at this point developing ‘a policy’.

Plantation Burning Policy:

In this day and age a burning policy is simply out of tune with community expectations.

In recent years much has been learnt about the harmful effects of smoke and it is now believed to be more harmful than first recognised.

The Precautionary Principle must be applied and burning should be stopped at the source. Deliberate burning means deliberate pernicious smoke.

Low intensity fires do not mean low intensity smoke; quite the opposite in many cases.

1 Low intensity fire:

Where have you got to so far?

Sadly nowhere if the Principles of this policy are to use low intensity fire.

Low intensity fire is capable of causing large quantities of toxic smoke which can be inhaled for long periods of time.

Please visit <http://www.cleanairtas.com> and follow the links to learn about the harmful effects of smoke.

Gunns cannot control smoke travel or dangerous levels of smoke in some areas once a fire is lit. A simple wind change can put vulnerable people's health and lives at risk.

Vulnerable people in our community are those with for example, respiratory disease such as asthma or COPD; cardiovascular disease; some diabetics, the young, and the elderly.

A great proportion of our (aging) population are vulnerable people.

Plantation burning does not show Gunns are sensitive to avoiding smoke emissions, and maximising carbon storages as claimed.

Gunns recognises burning is not the way of the future and yet wants to keep using smoky low intensity burns.

Low intensity burns drive people indoors against their will, and restricts their right to free travel in Tasmania.

Harmful toxins from accelerants used to light the fires can adhere to breathable particles and cross over into the blood stream.

2: All plantations managed by Gunns in Tasmania

Where have you got to so far?

Gunns undertake burning with, or for, other agencies in Tasmania. Smoke is smoke. Mention has not been made of this in the document.

There have been recent changes, but Gunns I believe, still own or manage plantations on the mainland.

If this is correct these operations need to be considered by Gunns when it comes to the use of any fire in any State for the following reasons:

- i) It has been determined by EPA Tasmania that mainland smoke is known to affect the lives of people in Tasmanian.
- ii) PM2.5 particle pollution from burns can travel up to a 1000km and stay airborne for weeks.

5: Revision - A new version will be issued whenever significant changes occur:

Where have you got to so far?

If it suits, this policy document could be thrown out by Gunns tomorrowand I hope it is. It carries no weight, can be changed at will, and is worded to allow Gunns to keep burning where ever, and whenever, they like.

Gunns are not exempt from our over-riding and principal Environmental Management and Pollution Control Act (EMPCA -1994):

The fundamental basis of EMPCA is the **prevention, reduction and remediation of environmental harm.**

While this is defined very broadly in section 5 of the Act as:

"any adverse effect on the environment (of whatever degree or duration) and includes an environmental nuisance" (the latter is defined as 'the emission of a pollutant that unreasonably interferes with, or is likely to interfere with, a person's enjoyment of the environment')".

This includes deliberately lit low intensity fires.

From the amount of time I have invested in this issue I do not believe Gunns Limited will ever receive a social licence to cause deliberate pernicious smoke in Tasmania from plantation related burns.

I also believe plantations have spread like a cancer across Tasmania.

I feel we must be mindful of how they are managed when we have the highest rates of asthma and non-skin cancer in Australia.

I would be happy "...to meet somewhere for a coffee..." when Gunns Limited totally removes the Plantation Burning Policy from their Plantations Policy and Procedures Manual because they manage their plantations without the use of fire, and without using polluting bioenergy plants as well.

Yours sincerely,

Clive M. Stott

<http://www.cleanairtas.com>



PLANTATION BURNING POLICY

1 Purpose

Plantation harvest residue management is a significant impediment to reforestation success within Tasmania. In order to achieve the required standards of reforestation, successful strategies must be adopted which are sensitive to avoiding smoke emissions, enhancing forest soil nutrition and maximising carbon storages.

In the past, some plantation establishment operations have utilised high intensity or broadcast burning techniques. The use of high intensity and broadcast burning techniques within Gunns' Tasmanian plantation operations ceased as of the 22nd of February 2011.

This document outlines the policy to be adopted by Gunns Limited from February 2011 onwards.

2 Scope

All plantations managed by Gunns Limited within Tasmania

3 References

- Gunns Limited Plantations Policy and Procedures Manual
- www.gunns.com.au

4 Procedural Principles

Harvest residues from previous plantations will be managed without the use of broadcast or high intensity burning with strategies such as but not limited to;

- Alterations to residue placement during harvesting operations;
- Utilisation of infield chipping in harvesting operations where appropriate; and
- Utilisation of specialised site preparation machinery which enables effective cultivation within unburnt harvest residues.

As a responsible landowner and forest manager, Gunns Limited will be sensitive to fuel hazards identified by stakeholders and where appropriate may utilise low intensity fire on small areas under controlled and transparent processes.

5 Revision History

This document is identified as '*Plantation Burning Policy*'. A new version will be issued whenever significant changes occur.

Version	Changes	Date
V1.0	Original	February 2011

Author:	Jim Wilson
Authorisation:	Greg L'Estrange
Signature:	
Date to be revised:	February 2011

7.22. Huon Resource Development Group

Huon Resource Development Group Policy on forest use and sustainable development

Our group is based with its focus on supporting developments in the Huon Valley based on the 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

Introduction:

The group is committed to encourage and support 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 industries based upon our natural assets including forestry, farming and fishing have provided a proud heritage for the Huon Valley. 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 Tasmania has of 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 recommendation of the Helsham inquiry that only 27,400 ha of forest had World heritage value, instead a political deal by 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, to last for 20 years, created certainty to see 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 affiliated with the national grassroots organisation, Timber Communities Australia. The Southwood site currently hosts a regrowth sawmill, selling the sawn product into the Australian market, a rotary peeled veneer plant selling product into south east Asia and a modern log segregation

facility to maximise the return from each log delivered to site. All are employ locals.

Another exciting step in the development will be the provision of renewable power- 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 large 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.

Projects like Southwood and traditional sawmilling enterprises will have long term benefits 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.

Whilst the Huon Resource Development group addresses issues such as road infrastructure, aquaculture, farming and tourism, a major focus is on forests and the employment that their sustainable management can create.

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 1898, 1914, 1934 and 1967 and from silvicultural regeneration. well managed forestry is compatible with scenic and landscape values.

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

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. Even in rare cases of the interval between fires being longer than the lifespan of eucalypts (about 400 years) the eucalypt forest is not preserved or 'saved' - it gives way to rainforest.

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 whether 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 harvesting residue is burnt and an ash bed created. 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 rather than used for lower value woodchips.
2. Special species timbers (e.g. myrtle and sassafras) are used by specialist furniture makers and craftspeople. Trees providing these timbers cannot be harvested 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 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 un-harvested 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.
7. The FSC system has no code of practice, lacks any detail tailored to Tasmanian conditions, and contains no provisions for on-ground planning, specialist supervision or compliance checks. Applied in isolation it would provide a lower level of environmental protection to Tasmanian native forests than the Forest Practices Code.

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. There is potential for a catastrophic effect on regional areas of Tasmania if native forest harvest is curtailed.
- 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.

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."

Yet the Statement of Principles and the latest green demands will place at risk these achievements.

Flaws in latest Green Demands

For the 2004 Federal election the Australian Conservation foundation and the Wilderness Society identified 240,000 ha of forests to be added to the reserves system. In a compromise the Federal Government agreed to reserve about 140,000 ha of this 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 as having high conservation value and demanded their 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.

Conservation values have been defined by the Convention of Biological Diversity and were reflected in the JANIS criteria used to create a Comprehensive Adequate and representative Reserve System, together with ecological sustainable forest management under the RFA in 1997.

The HCVF concept was initially developed by the Forest Stewardship Council (FSC) for use in forest management certification and first published in 1999. The FSC International standard 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).

There has been no independent check of these proposed HCV forests, or "due diligence" undertaken. Calls for their reservation are also at odds with continued forest management including production outlined by Principle 9 the FSC.

The Statement of Principles process proposes that 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 sawmillers!

The irony is, that plantations produce a very different product and environment than Tasmania's highly productive native forests. Our sawmills will need to convert from a specialty product to a commodity competing with plantations from the tropics and the developing world. Even the recently commissioned rotary veneer peeler plant at Southwood will not be able to use the less dense and more flexible plantation wood.

In short, a transition from native forests, an abandonment of the Regional Forest Agreement and not providing long term contracts for processors will destroy the Huon Valley forest sector.

Tasmania will also be at a disadvantage in marketing plantation wood, as even though the Statement of Principles encourages certification, the Forest Stewardship Council

prohibits the certification of "Plantations established in areas converted from natural forests after November 1994".

Conclusion

The Huon Resource Development Group has unanimously supported a motion that the Commonwealth acts to reject demands for more reservation, that it sticks by the RFA and that it gives security to the sawmillers, family contractors, the workers and their families who depend upon a diverse economy that includes a native forest sector.

The Huon Resource Development Group of Timber Communities Australia will only participate in discussions with Government and members of the State and Federal Parliaments within the following:

- 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 will be 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
- No existing contract or statutory obligation (including the Tasmanian Regional Forest Agreement) can be breached
- Prior to detailed consideration of the Statement of Principles, 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
- Once such a definition is agreed, and the forests are evaluated and a management plan developed, if the volume of resource is reduced, suitable forest currently outside the production area will be identified as an alternate harvest area

This complements the resolution adopted at a conference of TCA members in Tasmania held prior to the signing of the Statement of Principles:

"We support;

1. The Tasmanian Regional Forest Agreement.
2. The construction of a pulp mill as approved
3. No new forests to be added to the reserve system until these forests have been independently and scientifically assessed and verified for their high conservation values and an appropriate management plan determined through a comprehensive community stakeholder process."

In summary, such a commonsense approach will see the timber industry that pioneered Tasmania continue, based on the sustainable management of our renewable forest resource. A drive along the Arve Road to the Picton and Huon rivers demonstrates just how well our wet eucalypt forest regenerates after clearfell burn and sow silviculture treatment, which was developed by our forest scientists in the 1950s and 1960's and can continue to provide both timber and environmental values forever.

7.23. Redd Forests

PROTECTING THE DEVIL'S FORESTS

An Improved forestry management Project in Tasmania

Redd Forests Pty Ltd has created Australia's first internationally recognised Reduced Emissions from Deforestation and Degradation (REDD) project to meet VCS and Australian NCOS Standards. This project demonstrates the commercial viability of using the carbon market to provide an alternative income to landowners who, traditionally, have logged their land for income.

12% of the world's greenhouse emissions come from deforestation and degradation of land. Our forests are the lungs of the planet and we need them just as we need the very air itself that they purify.

About Redd Forests

Redd Forests Pty Ltd was incorporated in December of 2008 as a "profit for purpose" business designed to apply commercially viable methodologies to replace activities that degrade or destroy the world's forests.

Native and old growth forests in good condition

Tasmania is home to ancient forests that are beautiful, irreplaceable and vital for wildlife. Here live the tallest hardwood forests and the tallest flowering plants on Earth; some trees are over 400 years old and reach 97 meters in height. They are a huge store of carbon for the world.

They grow amidst rainforest tree species such as myrtle, leatherwood and celery top pine, with man ferns, mosses and lichens. Such ancient forests are incredibly precious as well as being the irreplaceable home of endemic wildlife.

Large areas have been cleared for agriculture, and the remaining forest is crucial habitat for endangered species such as the Tasmanian wedge-tailed eagle, white goshawk, swift parrot, giant crayfish and spotted quoll and, of course, the iconic Tasmanian Devil.

This remnant forest is especially important for maintaining ecological connectivity and resilience under the stresses of climate change.

This project will allow Tasmania to transition away from logging native forests for low value wood chips. Enough plantation forests exist and much of the already degraded land can be turned into plantations for any additional demand of wood chips for pulp.

The project area as it is now

The project area directly impacts climate change and biodiversity by storing and sequestering carbon dioxide and improving habitat for fauna and flora. By eliminating selective logging, and allowing natural regeneration of the key forest communities to continue, unabated. The project will enhance long-term biodiversity. Our project areas have

varied forest communities including:

Eucalyptus delegatensis: dry forest and woodland

Eucalyptus amygdalina: forest and woodland on dolerite

Eucalyptus viminalis: grassy forest and woodland

Eucalyptus delegatensis: forest with broad-leaf shrubs

Eucalyptus Regnans: wet sclerophyll forest with high carbon density

The forest areas are multi-aged, rich with natural undergrowth and provides the essential natural environment for local plants and animals.

The threat

Typical logging practices carried out include the use of clearfell silviculture, liquid incendiaries (napalm) and the poison sodium monofluoroacetate (#1080). Though legal, these practices are widely condemned.

Nearly all the logged wood is chipped and exported for pulp used in the manufacture of paper.

However, only one-third of the biomass of the tree is used and the residue is burned or, in the case of the roots, allowed to rot. As a consequence the emission of CO₂ into the atmosphere is almost immediate and, as paper has a short life, absolute within just a few years.

Although replacement plantations will sequester CO₂ in their short life they too will be harvested for pulp and the cycle of emissions continues.

Project details

Our projects are widespread across Tasmania and so far have protected over 18,000 hectares of native forests.

With your help we can extend that coverage to over 150,000 hectares and, in so doing, avoid the emission of up to 15 million tonnes of greenhouse gases over the 25 year project period.

By buying the carbon credits generated by our project you will enable the landowners to earn an income by protecting their forests instead of logging them.

Climate

Our projects will avoid the release of up to 15 million tonnes of greenhouse gases (CO₂-e), and ensure the ongoing sequestration of CO₂ by the forest over the 25 year project period.

Recent biomass surveys have found that some old-growth forests in Tasmania store more than 650 tonnes of carbon per hectare, exceeding the amount of carbon stored in the vegetation of most tropical rainforests. Plantations established in place of old-growth forests after clearing store considerably less carbon and are harvested regularly emitting any CO₂ they may have sequestered in their short life. As the wood from these plantations

is turned to pulp nearly all of their stored carbon is released into the atmosphere very quickly.

Community

This is a high-profile project with remarkable endemism and quantifiable financial additionality for the landowner ensuring that benefits will continue to accrue beyond the project's timeline of 25 years. It will also help maintain Tasmania's aesthetic beauty, and support the allimportant tourist sector while helping promote ecosystem services which support other land uses and human welfare. Project success will support a wave of new opportunities for local communities.

Biodiversity

Many of our project areas are home to healthy communities of the iconic, but now endangered Tasmanian Devil, as well as nesting sites of the endangered Wedge Tailed Eagle and numerous rare native flora as well as providing a natural habitat for Bettongs and Potoroos. Tasmania is a biodiversity island and highly threatened under a business-as-usual scenario.

Project Quality

Our projects are of the very highest veracity. They are validated and verified by external third parties and meet the rigorous criteria of the Climate, Community and Biodiversity Standards (CCBS) and the Voluntary Carbon Standard (VCS).

Accreditation by the VCS and CCBS assures investors that this project is of the highest calibre and brings positive outcomes not just in the fight against climate change but to the local community and the biodiversity of the region.

Voluntary Carbon Units (VCUs) issued by the VCS can be bought by those wishing to offset their emissions and move toward carbon neutrality. Buyers can rest assured of the accuracy, quality and ongoing verification of the projects and purchase the credits in full confidence of having helped avoid the emission of harmful greenhouse gasses and the degradation of our forests.