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Dear Ministers, Senators, and Opposition Spokespersons

Burning our Native Forests

Introduction

The Clarence Environment Centre has maintained a shop-front in Grafton for over 22 years, and has been closely involved with environmental issues, particularly those associated with forestry, since our formation. As a result we have serious concerns over the growing pressure to allow native forest timber 'waste' to be used to produce 'renewable energy'.

Last week, we understand the Bega Valley Shire Council approved a wood pellet plant for the Eden chip-mill and that the NSW Government is considering the industry test case - a proposal from Nippon Paper to build a wood-fired power station at its chip-mill.

Summary

State Forests are not owned by Bega Shire Council, or Nippon Paper, they are a public asset, and therefore are owned by the citizens of NSW who have a right to expect those forests's values to be protected by sustainable management in perpetuity, as required under the Integrated Forests Operations Approval. That approval requires Forests NSW to practice Ecologically Sustainable Forest Management, to ensure those publicly owned forests are not degraded for future generations.

There may be a case for genuine wood waste, waste that many timber mills already burn, to be used in a co-generation plant to help run their operation. At Bega this would be the chip-mill, with any possible surplus electricity fed back into the grid. However, building a stand-alone wood-fired power station would lock us into the use of non waste native forest timber to generate electricity in the event of a collapse in the wood-chip industry. This is unacceptable in forests which are already being logged at extraordinarily unsustainable levels.

Details of the current unsustainable management of the State's forests are included below, which will combine with climate change implications, to support our **call on the Government to ban the use of native forest timber to produce electricity, other than co-generation plants where only timber waste from the factory operation is used, and ban all production of biofuels from native forest wood.**

Climate Change Implications

Successive Australian governments have taken a prominent role in international efforts to stop native forest destruction in neighbouring countries like Indonesia, Borneo and Papua New Guinea, a move that appears to be more about appearing to be acting on climate change, while continuing to subsidise the destruction of our own forests for wood-chips and, increasingly, to burn to generate electricity.

While wood-fired power production may be a renewable energy source, it emits more than 5 times the greenhouse gas of coal fired power, and undercuts genuine renewable energy such as wind, wave and solar. Therefore we believe **a ban should also be placed on the export of native forest wood-chips and logs for burning or processing into biofuels.**

In a digital world, paper use is likely to decline. Book stores are already closing across the world, and posting of letters drastically reduced and being replaced by emailing. Newspapers too are increasingly moving on-line. Combined with the global financial crisis, this has seen a dramatic drop in the worldwide demand for wood-chip which, we believe is behind the current push by Nippon and others to burn the wood locally instead, and collect “credits” for doing so.

Without ongoing wood-chipping of millions of tonnes of native forest trees each year there would be no 'waste' to burn to generate electricity or make biofuels, so enormous pressure would be placed on governments (threats of job losses, etc.) to allow non-waste timber to be used instead.

Forests are the safest and most reliable means of removing greenhouse gases from the atmosphere. Protecting native forests is one of the fastest, cheapest and most effective ways to reduce greenhouse emissions. It would be nonsensical and highly counter-productive to use those trees to generate even more greenhouse gas.

Unsustainable forest management

The Clarence Environment Centre has exposed widespread illegal logging by Forests NSW on the NSW North Coast in order to meet its unrealistic wood supply contracts, and we have no reason to believe that the logging of rainforest, high conservation value old-growth forest, and endangered ecological communities, in both public and privately owned forests, is not widespread across the State, in the same way it is occurring in our region,.

Forests NSW makes numerous claims about its operations that have led to a current investigation by the ACCC. Typical of those claims is:

“Forests NSW sustainably manages more than 2 million hectares of native and planted forests for a wide range of economic, environmental and social values to internationally recognised standards.” - <http://www.dpi.nsw.gov.au/forests/about-forests-nsw>

Forests NSW bases this and many similar claims on the fact that it is required to undertake '**Ecologically Sustainable Forest Management**' (EFSM) which underpins the Regional Forests Agreements and is defined in the 'Integrated Forests Operations Approval' as:

“the management of forests so that they are sustained in perpetuity for the benefit of society, by ensuring that the values of forests are not lost or degraded for current and future generations.”

In short FNSW claims:

1. It uses an internationally recognised standard, such as the Australian Forestry Standard,
2. it runs a profitable business for the people of NSW,
3. it manages forests sustainably, to provide a supply of timber today and into the future,
4. it manages forests to maintain ecological principles and biodiversity, and
5. that by meeting the demand from NSW for timber from local sources, it is positively contributing to the sustainability of the world's forests.

Claim 1. We believe the fact that Boral is currently seeking FSC 'Controlled Wood' approval for its products reveals the first claim to be a lie, as many of Boral's customers, in Australia and overseas, **do not recognise** the Australian Forestry Standard.

Claim 2. Likewise, the fact that the NSW Auditor General has reported consecutive operating losses by Forests NSW in recent years, means the second claim is patently false.

Claim 3 also cannot be supported with the NSW Auditor General making the following points in his 2009 Performance Audit:

- a) *To meet wood supply commitments, **the native forest managed by Forests NSW on the north coast is being cut faster than it is growing back.***
- b) *The North Coast region has been unable to meet its species commitment since 2004 for blackbutt (the North Coast's most logged species, at 24%).*
- c) *current yield from native forests in the north coast is **not sustainable in the long term.***

Even the industry acknowledges that current logging rates are not sustainable. In 2010 The Institute of Foresters of Australia wrote: “In NSW **the adopted forest strategy is to unsustainably cut the available public native forest through to 2019/2023 at which point hardwood plantations are proposed to be available to make up the very significant shortfall in logs. Unfortunately, the species mix and rate of plantation development in NSW post 2000 makes this unachievable**”.

If further evidence is needed The Department of Primary Industries “Economic Policy Settings in the Forest and Timber Industry – An inter-jurisdictional comparison”, advises that: “**There is concern that Forests NSW will not be able to meet commitments in Wood Supply Agreements with the current forest areas allocated for commercial forest production. This is evidenced through the fact that Forests NSW is purchasing private native forest resources to meet current commitments.**”

Claim 4, that FNSW “*manages forests to maintain ecological principles and biodiversity*”, is the biggest lie of all. With no comprehensive baseline data available to measure the biodiversity levels in state forests, and no mechanism in place to actually measure ongoing trends over time, we have to resort to compiling the evidence ourselves.

A review panel headed by ANU's, Professor Allan Hawke, and commissioned by the then Federal Environment Minister, Peter Garrett in 2009, was damning, and found that **the Agreements have done little to protect the environment from logging, were unaccountable, hard to measure and almost impossible to enforce.** Hawke identified that:

- “... **there is significant community concern that the environmental outcomes from RFAs are not being delivered,**
- **public submissions to the Review were critical of the limited mechanisms to ensure RFA forestry operations are compliant and best practice, and**
- **the public lacks confidence that the RFAs are meeting the objectives, both environmental and economic, they were designed to achieve**”.

Hawke sums up that: **The issue of concern to the review is that the current process for review and auditing RFAs is neither independent nor transparent, and more importantly, in most cases, required reviews are not being undertaken. Long-term sustainability of the forests and forest industry require this to be rectified.**”

Senator Bob Brown echoed the feelings of most independent ecologists and conservationists when he described the RFAs as, "*a licence to slaughter endangered species which would see other operators put in jail.*"

That "licence to slaughter endangered species" is the Threatened Species Licence granted to Forests NSW, which allows the destruction of up to 10% of a range of threatened species, including some listed as endangered. This 10% destruction is allowed each time an area is logged, which is currently occurring as frequently as every 10 years.

Forests NSW has requested the NSW Scientific Committee to reverse the threatened species listing of some threatened species. The 2010 request to de-list the endangered *Macrozamia johnsonii*, a Cycad that only occurs at and near Chaelundi south of Grafton, is a case in point, with the only reason being to allow unrestricted access to timber where the Cycads occur.

The following are additional incontrovertible facts relating to state forest biodiversity management,

- **Weed infestations** are worsening across the region, with little or no weed control occurring in State forests beyond road verges. These infestations are facilitated by excessive removal of basal volumes of timber and associated canopy loss.
- **Vertebrate pests** are likewise increasing across the landscape including in state forests.
- Forests NSW routinely **challenges any threatened species nominations** that are presented to the NSW Scientific Committee.
- In late 2009, the NSW Scientific Committee determined the dieback disease, **Bell Miner Associated Dieback (BMAD)**, is a Key Threatening Process. Apart from identifying that some 4 million hectares of forest in NSW is at risk from the dieback, a major finding was that it is triggered by forest canopy reduction in excess of 35%.

With Forests NSW routinely logging an average 40% on each rotation, with many areas losing upwards of 70% of canopy (**reference any Harvest Plan**), the dieback is following logging operations across northern NSW. Forests NSW is in denial and refusing to reduce logging rates.

- 33% of all threatened terrestrial fauna are tree-hollow dependent, with loss of habitat identified as the main cause of decline. **Habitat trees**, that can take well over 100 years to develop hollows, are routinely removed during logging (seen as impediments to the development of younger trees), taking advantage of:
 - i) **An ineffectual regulatory agency** that has failed time and again to take action when breaches of this Threatened Species Licence requirement occurs.
 - ii) Using the excuse of **Occupational Health and Safety** laws to remove old-growth trees.
 - iii) **"Accidental" damage** of old-growth trees by machinery,
 - iv) deliberate destruction of old trees during post harvest burning, and
 - v) by 'strategic' alignment of roads and snig tracks to maximise habitat tree destruction.
- Subjecting the forests to basal volume removal of up to, and frequently exceeding, 70% will almost always result in the structure of those forests being changed forever.
 - i) Wet sclerophyll forests will **become more fire prone** as a result of changed species mix.
 - ii) Faster growing eucalypt species will tend to reestablish to the detriment of slower growing species.
 - iii) High density regrowth requires thinning operations which see undesirable species removed, resulting in a **virtual monoculture** of even-aged trees.

In Conclusion: The claim that current logging strategies in the Upper North East region of NSW is ecologically sustainable, i.e. ensuring that the values of forests are not lost or degraded for current and future generations, is patently false.

Claim 5. The argument that, by meeting local timber demand, Forests NSW is positively contributing to the sustainability of the world's forests, is trotted out so frequently, their officers are clearly starting to believe their own spin.

There is never any mention of the millions of hectares of forest clear-felled in southeastern Asia each year, not to produce timber (much of it being burned), but to plant palms to fill a demand for oil from rich economies such as Australia, or that South America's Amazon forests are likewise being replaced by soy beans to feed cattle for beef production and biofuel, must have commodities for more affluent societies.

Illegal logging

Continually frustrated by what we believed to be systemic breaches of Forests NSW's Threatened Species Licence, and the Environment Department's failure to take our complaints seriously, the Clarence Environment Centre joined with other environment groups to fund professional independent audits of logging operations in our north coast region.

Four comprehensive audits were undertaken in a 12 month period between mid 2009 and 2010, which identified widespread breaches, and illegal logging of supposedly protected rainforest; old-growth-high conservation value forests, and endangered ecological communities. The Office of Environment and Heritage (OEH) has already confirmed allegations, and pronounced FNSW guilty on several counts in one State Forest (Yabbra), and claims it will recommend prosecution over two other cases (Doubleduke and Grange), while the fourth (Girard) is still under investigation.

All 4 audits revealed systemic breaching of the IFOA, and the Threatened Species and Fisheries Licences. Literally thousands of the breaches we reported have been confirmed by the OEH investigators. The fact that none were identified by OEH in the first instance, is a serious indictment of its supposedly rigorous, proactive compliance monitoring program.

Logging on Private Property.

Timber sourced from private property is regulated by OEH under the Private Native Forestry (PNF) Code of Practice, which claims to ensure that overall ecological values are "maintained or improved".

As with the State Forest logging however, there is no mechanism in place to measure trends in ecological values. Not only that, **but under the Code there is no requirement to undertake any pre-logging flora and fauna assessment, and operators need only consider those threatened species that are mapped on the State's Wildlife Atlas as occurring at the site.** Few rural properties have ever been surveyed for flora and fauna, so threatened species records on these properties are rare, while there has been no mapping of Endangered Ecological Communities at all.

OEH admits that its staff do not have the expertise to recognise EECs or many threatened species. As a result of this, OEH's PNF Unit has approved the logging of these supposedly protected communities on many properties in our region.

Recent revelations have shown that OEH's PNF unit has likewise been "interpreting" the Code to facilitate logging. In Northern NSW it has been revealed that:

- More than 8,000 hectares of mapped High Conservation Value Old Growth forest has been reclassified by the Unit to allow its logging.

- Thousands of hectares of mapped core Koala habitat has been approved for logging in the Coffs Harbour LGA, in breach of Council's Koala Plan of Management. Letters obtained under “Freedom of Information” clearly show that Coffs Harbour Council had been raising concerns about the logging of core koala habitat for 16 months, and were ignored.

As well, The State Government has relaxed laws pertaining to PNF which now:

- allows logging to occur in Endangered Ecological Communities, and
- allows unrestricted logging on steep hillsides which were previously mapped as “Protected Land” where logging was restricted.

In conclusion, there is no way that logging on private property under the PNF Code of Practice, can be shown as ecologically sustainable. Many approvals allow the logging of the entire property, so the claim that such logging approvals maintain or improve ecological values, likewise cannot be supported.

**Yours sincerely,
John Edwards
Honorary Secretary.**